#### WACHTELL, LIPTON, ROSEN & KATZ

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#### April 12, 2022

<u>Via E-Apps</u> Colette A. Fried Assistant Vice President Federal Reserve Bank of Chicago 230 South LaSalle Street Chicago, IL 60604-1413

> Re: <u>Additional Information Regarding Application by Bank of Montreal</u> and BMO Financial Corp. to Acquire Bank of the West

Dear Ms. Fried:

We are submitting this letter and the related exhibits in response to your request for additional information, dated March 31, 2022, regarding the application seeking the prior approval of the Board of Governors of the Federal Reserve System (the "<u>Federal Reserve</u>") for Bank of Montreal ("<u>BMO</u>") and BMO Financial Corp. ("<u>BFC</u>") to acquire all the shares of BancWest Holding Inc. ("<u>BW Holding</u>") and thereby acquire control of its subsidiary bank, Bank of the West ("<u>BOTW</u>") (the "<u>Application</u>"). For ease of reference, your questions are included in bold with the responses immediately following. Capitalized terms used herein and not otherwise defined shall have the meaning ascribed to them in the Application.

\* \* \*

Confidential treatment is being requested under the federal Freedom of Information Act, 5 U.S.C. § 552 (the "FOIA"), and the implementing regulations of the Federal Reserve, for the information contained in the Confidential Exhibits Volume to this response letter (the "Confidential Materials"). The Confidential Materials may include, for example, nonpublic pro forma financial information and information regarding the business strategies and plans of (1) BMO, BFC and BHB and (2) BNP Paribas S.A. ("BNPP"), BW Holding and BOTW, and other information regarding additional matters of a similar nature, which is commercial or financial information that is both customarily and actually treated as private by BMO, BFC, BHB, BNPP, BW Holding and BOTW and provided to the government under an assurance of privacy. Certain information in the Confidential Materials also includes confidential supervisory information, which is protected from disclosure. None of this information is the type of information that would otherwise be made available to the public under any circumstances. All such information, if made public, could result in substantial and irreparable harm to BMO, BFC, BHB, BNPP, BW Holding and BOTW. Other exemptions from disclosure under the FOIA may also apply. In addition, investors and potential investors could be influenced or misled by such information, which is not reported in any documents filed or to be filed in accordance with the disclosure requirements of applicable securities laws, as a result of which BMO, BFC, BHB, BNPP, BW Holding and BOTW could be exposed to potential inadvertent violations of law or exposure to legal claims. Accordingly, confidential treatment is respectfully requested for the Confidential Materials under the FOIA and the Federal Reserve's implementing regulations.

Please contact me or Richard K. Kim (212-403-1354) before any public release of any of this information pursuant to a request under the FOIA or a request or demand for disclosure by any governmental agency, congressional office or committee, court or grand jury. Such prior notice is necessary so that BMO, BFC, BHB, BNPP, BW Holding and BOTW may take appropriate steps to protect such information from disclosure.

If you have any questions about this submission or confidential treatment request, please do not hesitate to contact me.

Very truly yours,

*Ro Spaziani* Rosemary Spaziani

Enclosures

#### **Response to Federal Reserve Additional Information Request**

#### **Convenience and Needs**

1. Please provide a list of organizations and community groups, if any, with which BHB engaged since 2020 to help reach African American and Latino borrowers as well as borrowers residing in majority-minority census tracts. In your response, please provide detailed information about the partnerships that BHB engaged in with these organizations and community groups since 2020.

#### Community & Civic Partners

BMO-FG partners with a number of non-profits, businesses, community groups and community investment partners to help us engage African American and Latino borrowers. Please see Exhibit 1 for a detailed list of the community partners that BMO-FG engages with for this activity.

#### **Outreach Events & Webinars**

BMO-FG leads and participates in a number of events and webinars to reach African American and Latino borrowers residing in majority-minority census tracts. These events include educational presentations, events with community partner organizations, expos, civic roundtables and other external events. Please see <u>Exhibit 2</u> for a list of the events and webinars that BMO-FG has participated in since 2020.

#### Financial Literacy

BMO-FG provides financial literacy programming in the communities it serves on a variety of topics including homebuying, small business management, access to capital, financial planning as well as specialized programming for school aged children. In 2021, 8,410 people benefitted from BMO-FG's financial literacy programs through 193 events and over 100 community partners. Please see Exhibit <u>3</u> for a detailed list of BMO-FG's financial literacy programming events.

#### Community Investment Partners

BMO-FG's Community Investments Group helps developers and organizations by providing capital and financial expertise for projects with high social and economic impact in low- and moderate-income communities. Their work supports BMO-FG's commitment to small business expansion, increased availability of quality, affordable housing and targeted community-based commercial real estate. Please see <u>Confidential Exhibit A</u> for BMO-FG's recent community investments partnerships.

#### Minority & Women-led Funds

BMO-FG makes CRA qualified investments in minority and women-led funds. Examples include investments in affordable housing funds to create affordable housing units or Small Business Investment Corporations to help create jobs. Please see <u>Confidential Exhibit B</u> for a list of BMO-FG's recent CRA qualified investments in minority and women-led funds.

#### **BMO-FG** Funded Grants

BMO-FG provides grants to non-profits with programs related to African American and Latino borrowers (home and business). Please see <u>Confidential Exhibit C</u> for a list of disbursed BMO-FG grants.

In addition to the foregoing, BMO-FG provides financial contributions in support of community stakeholders/partners projects, programs, events, and initiatives designed and organized by community stakeholders/partners. BMO-FG support these organizations by engagement with the audiences that the community stakeholders/partners serve. BMO-FG also offers products and programs that serve the audience of the community stakeholders/partners. These products and programs are designed for the community stakeholders/partners audience of potential homebuyers that are low- and moderate-income, or for those that purchase in low- and moderate-income census tracts and/or majority minority census tracts or those seeking to grow in financial education. In addition, BMO is at the table (virtual for 2020 and 2021) for "Think Tank" and best practice conversations and strategies relative to what and how, BMO-FG can help do to serve our respective and collective communities

## 2. Please provide information about BHB's efforts to reach African American and Latino borrowers and borrowers residing in majority-minority census tracts, including any specialized products and marketing campaigns, since 2020.

BMO-FG, including BHB, is committed to providing affordable and convenient access to lending products and services to those historically underserved by financial institutions.

*Small businesses.* In September 2020, BMO-FG's Black and Latinx Small Business Program launched. This program was designed to fuel growth for Black and Latinx businesses through better access to capital, educational resources, mentoring and other meaningful networking opportunities. Since September 2020, the program has topped nearly \$20 million in loan authorizations. Out of the more than 2,000 applications, more than 600 applicants have received approval and funding. In late 2021, BMO-FG also launched a companion program geared toward women-owned small businesses – BMO for Women.

*Individuals*. BHB's Credit Builder program helps customers build credit history with low cost and little risk through a small dollar loan secured by a CD where the loan proceeds are deposited. Customers make payments over time and at the end of the loan term, the CD proceeds (with interest) are provided to the customer. In 2021, 1,285 Credit Builder accounts were opened by BMO customers with 92% opened by low- and moderate-income individuals.

BMO's Smart Money Account is a path to traditional banking services for the under- and unbanked in the communities we serve. This low-fee checking account has no overdraft or NSF fees, and requires no minimum balance. Additionally, all fees are waived for customers under the age of 25, giving those just starting up a leg up. 68,157 accounts were opened in 2021. In 2021, this product received a Bank On certification for meeting the Bank On National Account Standards, which

include low costs, no overdraft fees and transaction capabilities such as a debit or prepaid card and online bill pay.

*Residential Mortgage Products and Services.* BHB offers a wide variety of homebuying/ down payment assistance programs including:

- Homebuyers receive up to \$40,000 in student loan forgiveness in conjunction with a home purchase through BMO's Smart Buy program.
- Our Welcome Home Grant offers assistance in Majority Minority Census Tracts which can be layered to provide homebuyers up to \$24,500 in down payment assistance in certain communities.
- The Community Home Improvement Loan offers up to \$10,000 to complete home repairs even with limited equity on a customers' home.

# 3. Please provide a list of organizations and community groups, if any, with which BOTW engaged since 2020 to help reach African American and Latino borrowers. In your response, please provide detailed information about the partnerships that BOTW engaged in with these organizations and community groups since 2020.

BOTW created a dedicated team within its Consumer Residential Mortgage Division to increase homeownership opportunities for underserved community members. Members of this Consumer Lending Diverse Markets team have proactively sought and built partnerships with nonprofit community organizations and realtor groups that focus on increasing homeownership to African American and Latino community members. These Business Development Officers serve on the organization boards, provide financial and homebuyer education to consumers, and product training to real estate agents. Please see <u>Confidential Exhibit D</u> for a list of the organizations with which BOTW has actively engaged.

## 4. Please provide information about BOTW's efforts to reach African American and Latino borrowers, including any specialized products and marketing campaigns, since 2020.

BOTW has not created specialized products or executed marketing campaigns that are directly targeted to African American and Latino borrowers.

#### Section 4 of the BHC Act

5. Discuss whether Applicants could retain less than all the voting shares of CLAAS Financial Services LLC, San Francisco, California ("CLAAS JV"), indirectly through BOTW during the Intermediate Period under section 225.22 of the Board's Regulation Y, 12 CFR 225.22. Include in your response a discussion of whether there is express statutory authority for a national bank to acquire or retain voting shares of the kinds and amounts of a company engaged in the same activities as CLAAS JV (*see* 12 CFR 225.22(e)(2)(i)). If not, discuss whether Applicants must provide notice pursuant to

### sections 4(c)(8) and (j) of the BHC Act and subpart C of the Board's Regulation Y to retain less than all the voting shares of CLAAS JV during the Intermediate Period.

Section 225.22(e)(2) applies to a state-chartered bank's acquisition or retention of certain security interests. BOTW's investment in CLAAS JV pre-dates the Proposed Transaction and its holdings will not change as a result of the Proposed Transaction. Furthermore, the Intermediate Period will be a few minutes and, during that time, the direct bank holding company of BOTW will remain BW Holding. Based on the foregoing, the Applicants do not believe that there is any separate notice or application that is required for BOTW to continue to hold its interests in CLAAS JV.

However, in the event that the Federal Reserve believes such notice is required, BMO-FG and BOTW will submit such additional notice to confirm that BOTW can continue to hold of its interests in CLAAS JV during the momentary Intermediate Period.

6. Discuss whether Applicants could retain the voting shares of BancWest Investment Services, Inc., Omaha, Nebraska ("BWIS"), indirectly through BOTW during the Intermediate Period under section 225.22 of the Board's Regulation Y, 12 CFR 225.22. Include in your response a discussion of whether BWIS engages solely in activities in which BOTW may engage, at locations at which BOTW may engage in the activity, and subject to the same limitations as BOTW were engaging in the activity directly (see 12 CFR 225.22(e)(2)(ii)). If not, discuss whether Applicants must provide notice pursuant to sections 4(c)(8) and (j) of the BHC Act and subpart C of the Board's Regulation Y to retain the voting shares of BWIS during the Intermediate Period.

As noted in the response to question 5 above, Section 225.22(e)(2) applies to a statechartered bank's acquisition or retention of certain security interests. BOTW's investment in its wholly-owned subsidiary, BWIS, pre-dates the Proposed Transaction and its holdings will not change as a result of the Proposed Transaction. For the reasons set forth above, Applicants do not believe that there is any separate notice or application that is required for BOTW to continue to hold its interests in BWIS.

However, in the event that the Federal Reserve believes such notice is required, BMO-FG and BOTW will submit such additional notice to confirm that BOTW can continue to hold of its interests in BWIS during the momentary Intermediate Period.

7. Discuss whether Applicants could retain the voting shares of First Santa Clara Corporation, San Francisco, California ("FSCC"), indirectly through BOTW during the Intermediate Period under section 225.22 of the Board's Regulation Y, 12 CFR 225.22. In your response, clarify whether FSCC (i) engages solely in servicing activities for BOTW and its affiliates in connection with their activities as authorized by law; (ii) complies with the Board's published interpretations; and (iii) does not act as principal in dealing with third parties (*see* 12 CFR 225.22(b)(1)). If not, discuss whether Applicants must provide notice pursuant to sections 4(c)(8) and (j) of the BHC Act and

### subpart C of the Board's Regulation Y to retain the voting shares of FSCC during the Intermediate Period.

The Applicants could retain voting shares of FSCC indirectly through BOTW under 12 CFR 225.22. As noted in your Request, a bank holding company may, through its state-chartered bank subsidiary, "to acquire or retain securities . . . of the kinds and amounts *explicitly eligible by federal statute* for investment by a national bank". 12 U.S.C. 24(Seventh) provides that a national bank may exercise "all such incidental powers as shall be necessary to carry on the business of banking; by discounting and negotiating promissory notes, drafts, bills of exchange and other evidences of debt...".

BHB has confirmed FSCC solely serves in the nominal role of third-party trustee on deeds of trust for California and Nevada properties securing commercial and residential loans that are held by BOTW. Such activity is necessary to carry on the business of banking, particularly in connection with extending of credit. BHB has further confirmed that FSCC complies with the Board's published interpretations and does not act as principal in dealing with third parties.

8. Discuss whether Applicants could retain less than all the voting shares of Bank of the West Business Park Association, L.L.C., Omaha, Nebraska ("BOTWBPA"), indirectly through BOTW during the Intermediate Period under section 225.22 of the Board's Regulation Y, 12 CFR 225.22. Include in your response a clarification whether BOTWBPA holds or operates property "used wholly or substantially" by a subsidiary of BW Holding in its operations or for its future use (*see* 12 CFR 225.22(b)(2)(vi)). Provide BOTW's share of total occupancy of each property owned or operated by BOTWBPA and share of total occupancy of the properties in the aggregate. Describe whether the activities of BOTWBPA are limited to managing Bank of the West Business Park; if not, describe other activities conducted by BOTWBPA.

As noted above, a bank holding company may, through its state-chartered bank subsidiary, "to acquire or retain securities . . . of the kinds and amounts explicitly eligible by federal statute for investment by a national bank". A national bank's authority to own real estate is governed by 12 U.S.C. § 29 ("section 29"). Section 29(First) provides that a national bank may purchase, hold, and convey such real estate "as shall be necessary for its accommodation in the transaction of its business." In implementing section 29, 12 CFR 7.1024 provides that a national bank may acquire and hold real estate that, in relevant part, is occupied by the national bank or its branches or subsidiaries, by "any reasonable and prudent means, including ownership in a fee, a leasehold estate, or an interest in a cooperative".

BOTWBPA is a permissible investment in real estate premises, as this entity is a real estate cooperative and BOTW holds its interest solely in relation to the real estate it occupies for its business operations. As set forth in the BOTWBPA Operating Agreement, included in <u>Confidential Exhibit E</u>, each owner of a lot (other than an "outlot") is a member of BOTWBPA.<sup>1</sup> Votes are

<sup>&</sup>lt;sup>1</sup> The outlots are comprised of four common lots, which are owned by BOTWBPA. Brick and stone monument

associated with parcels based on the relative size of the lot against the total square footage of all lots (namely, 2,711,693 square feet). Fourteen different owners own lots and are therefore members of the Association. Any distributions related to the Association are in accordance with the ownership levels and any sale of the relevant lot would result in a change of membership.

Due to the nature of the Association, the ownership interest in the Association is directly linked to BOTW's ownership of specific lots of real estate that it occupies as part of its business. BOTW owns 2 lots and has 21 votes out of a total of 55 of BOTWBPA. The first lot at 13220 California Street houses BOTW Midwest/Great Plains regional headquarters, a retail branch, and other back-office functions, including BWIS. The other lot at 13505 California Street is a major operations center for BOTW.

Based on the foregoing, this ownership interest is a permissible interest in real estate cooperative for the purposes of bank operations under section 29 and 12 CFR 7.1024.

signs are located on each one.

#### **Exhibit Volumes**

#### PUBLIC EXHIBITS

BMO-FG Community & Civic Partners	1.
BMO-FG Events and Webinars	2.
BMO-FG Financial Literacy Events	3.

#### CONFIDENTIAL EXHIBITS

BMO-FG Recent Community Investment Partnerships	А.
BMO-FG Investments Minority and Women-Led Funds	B.
Certain BMO-FG Grants	C.
BOTW Community Organizations	D.
BOTWBPA Operating Agreement	E.

Stakeholder	Stakeholder type:	Description
Ascendus (formerly Accion East)	non-profit/CDO/CDFI	Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that empowers low- to moderate income (LMI) business owners in Florida with access to capital and financial education.
Allies for Community Business	non-profit/CDO/CDFI	Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that helps to provide businesses in IL and IN with financial coaching/education, networking, and access to alternative forms of capital.
<u>BizStarts</u>	non-profit/CDO/CDFI	Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that assists start-ups in WI by teaching the tools of entrepreneurship and connecting them to helpful
<u>Chicago Urban League</u>	non-profit/CDO/CDFI	resources that clear the path to success. Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that works to achieve equity for Black families and communities in Chicago through social and economic empowerment.
<u>City of Chicago</u>	non-profit/CDO/CDFI	Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that provides regional business development hubs for Chicago small businesses offering licensing assistance and other resources
<u>DreamSpring</u>	non-profit/CDO/CDFI	Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that offers business loans from \$1,000 to \$2 million, along with training, networking and other support services to those who own or want to start a business.
Dream Team Enterprises, Inc	business/corporation	Community leader, Radio host of 1390am. BMO has been featured on radio program.
DuPage County NAACP	non-profit/CDO/CDFI	Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that works to ensure the political, educational, social and economic equality of rights of all persons and to eliminate racial hatred and racial discrimination.
<u>Florida State Hispanic Chamber of</u> <u>Commerce</u>	non-profit/CDO/CDFI	Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that promotes the economic growth and development of Hispanic entrepreneurs in Florida and represents the interests of over 604,000 Hispanicowned businesses across
Illinois Department of Commerce & Economic Opportunity	non-profit/CDO/CDFI	Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that support and maintain a climate that enables a strong economy for otheir customers -taxpayers, businesses, workers and communities - by keeping, attracting and growing businesses, maintaining a skilled workforce, and enhancing communities so that the climate here is one in which businesses, small and large, and workers, can succeed to the greatest extent possible. Working on multiple initiatives within Illinois to educate Latinx Business owners from resources and programs
Illinois Hispanic Chamber of Commerce	non-profit/CDO/CDFI	Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that provides business, economic
Illinois Small Business Development Center Humboldt Park	non-profit/CDO/CDFI	development and entrepreneurial educational programs that enhance business practices and increase the success of Hispanic entrepreneurs. Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that offers no-cost advising and is dedicated to helping new and established entrepreneurs access networks and resources to grow their business and achieve long-term
Imagen Consultants LLC	business/corporation	Imagen Marketing Consultants is an award winning Chicago based multi- cultural, experiential and activation marketing agency. We make the connections between your brand and appropriate ethnic/civic groups and proactively weave them into a powerful web of influence. We partner with people and organizations who know your market. Organizer of Chicago Latina Expo and Latinx Talks; Community partner

Justine Petersen	non-profit/CDO/CDFI	Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that provides comprehensive
Little Village Chamber of Commerce	non-profit/CDO/CDFI	credit score counseling, access to credit building products, serves existing and startup businesses in KS and MO with affordable capital, business training, and the MicroMentor mentoring Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that supports, promotes and enhances the growth and success of local businesses and to leverage the community's assets, contributions and unique Mexican identity cultural identity to generate new business opportunities.
Midway Broadcasting Corporation (WVON)	business/corporation	BMO worked with WVON Chicago to feature Black and Latinx Program ad and radio show features
Turner Construction School of Management	non-profit/CDO/CDFI	Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that provides training course for minority- and women-business owners in Chicago in the disciplines
Urban League of Greater Madison	non-profit/CDO/CDFI	practiced in the construction industry. Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that works to ensure that African Americans in Madison, WI and other community members are educated employed and employed to live well advance professionally and
Urban League of Metropolitan St. Louis	non-profit/CDO/CDFI	educated, employed and empowered to live well, advance professionally and contribute to the common good in the 21st Century. Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that works to empower African Americans and others throughout the region in securing economic
Wisconsin Women's Business Initiative Corporation (WWBIC)	non-profit/CDO/CDFI	self-reliance, social equality and civil rights. Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that provides access for all business owners (not just women) to capital, one-on-one business
<u>Women's Business Development Center</u> (WBDC)	non-profit/CDO/CDFI	assistance, business education, and financial awareness education programming. Community partner of Business Banking Specialty Programs (BMO for Black and Latinx Businesses and Women in Business) that works to support and accelerate business development and growth, targeting women and serving all diverse business owners, in order to strengthen their participation in, and impact on, the economy. Serves Iowa, Kansas, Minnesota, Missouri,
OCC's Project Reach	non-profit/CDO/CDFI	Nebraska, North Dakota, South Dakota, and Wisconsin Project Reach promotes financial inclusion through greater access to credit and capital. BMO is a national participant in the project and will serve as co- chair for Project Reach's effort in Milwaukee
2021 Bank On National Conference	non-profit/CDO/CDFI	The Bank On National Conference brings together local Bank On colation leaders, financial instituions, regularoty agencies, local government officials to share best practices in serving unbanked and underbanked populations. BMO sponsored the 2021 conference.
Presidential Commission on Financial Inclusion	non-profit/CDO/CDFI	BMO is signatory to a support letter published in response to the Aspen Institute's call for a Presidential Commission on Financial Inclusion
Advancing Equity in Banking Commission	_ non-profit/CDO/CDFI	Advancing Equity in Banking Commission. BMO has been a lead participant in the Advancing Equity in Banking Commission, a key initiative of the Illinois and City of Chicago Treasurers' office. As part of this commission, BMO has participated in multiple events and workshops exchanging best practices in how to reach more
Chicago Housing Authority	non-profit/CDO/CDFI	diverse borrowers and foster a more diverse workforce. During the pandemic, BMO partnered with the Chicago Housing Authority to bring financial literacy and budget tools to residents of the Chicago Housing Authority in an effort to promote our Bank On accounts and planning and budgeting for
<u>United Power</u>	non-profit/CDO/CDFI	homeownership. These sessions also highlighted the Child Tax Credit and provided information on how to access these resources. Over the past year, BMO has been in discussions with United Power, a coalition of faith-based organizations working in the Chicago area that seek to bring homeownership opportunities to residents of Chicago's south and west sides. We continue to explore the potential for a revolving loan fund to support the construction of new single family homes in areas of the city that have been

Business Leadership Council		BLC is Chicago's Black business organization of more than 120 of Chicago Black business leaders and entrepreneurs. BMO partenered with the organization to provide assistance to members seeking Paycheck Protection
	business/corporation	Program loans.
<u>Chicago Bulls</u>	business/corporation	BMO partnered with Chicago Bulls to launch a program to support and highlights Chicago Black owned businesses.

#### Exhibit 2

Type of Event	Organization	Date	State
	Turner School of Construction Management	12/8/2020	
	Quad County African American Chamber	12/10/2020	
	BMO for Women 2021 Webinar - Social Media Rise Up Pitch	1/21/2021	
	City of Chicago - PPP Webinar	2/2/2021	
	WVON 1690 "The Social Justice Hour" Atty Ernest Fenton	2/10/2021	IL
	Woodlawn Chamber of Commerce	2/10/2021	
Educational Presentations	NAWBO - Critical Elements Impacting your Business in 2021	2/10/2021	
	SBDC Humboldt Park PPP Webinar	2/18/2021	
Educational Presentations	l Heart Media-1390AM	2/22/2021	
Educational Presentations	Chicago Urban League - Business Resiliency for Black Owned Businesses	2/24/2021	
	Chicago MBDA - Financial Opportunities for Minority Business	3/3/2021	
	BLC Business Leadership Council - Women In History	3/16/2021	
	Chicago Urban League - PPP Webinar	3/18/2021	
	BMO for Women - Women in Business: Drivers of Change and Innovation	3/18/2021	
	Melrose Park Chamber of Commerce	3/25/2021	IL
Educational Presentations		4/1/2021	
Educational Presentations		4/10/2021	-
Educational Presentations	•	4/12/2021	Ш
	WVON- Money Smart Interview	4/13/2021	
	Turner School of Construction Management	4/13/2021	
	City of Chicago Regional Business Centers - Decoding Business Data	4/20/2021	
Educational Presentations		4/21/2021	
	WVON 1690 "The Talk of Chicago" Samantha Thomas	4/21/2021	
Educational Presentations	-	5/22/2021	
	Bunker Labs - Business Acumen	6/2/2021	
	BMO for Women 2021 Webinar - Social Media	6/2/2021	
Educational Presentations		6/30/2021	
	Chicago Urban League - Importing and Exporting	7/20/2021	Ш
	Southland Black Chamber of Commerce	7/27/2021	
	Black Women Expo - Business Acumen	8/23/2021	
Educational Presentations	-	8/25/2021	
	Feb 2022 Banking Workshop - IDOT	2/22/2022	
	Feb 2022 Banking Workshop - IDOT	2/23/2022	
Educational Presentations		2/9/2022	
	Sisterpreneuer - Demstfying the Loan Process	3/22/2022	
	North Lawndale Employment Network	3/22/2022	
Educational Presentations		3/29/2022	
	WVON 1390 Sunday Morning Money Talk	3/28/2022	
Events with Partner	MBDA Cares Act Program Coordinator	3/3/2021	
Events with Partner	WBDC - Women Driving Change in Business Panel	3/18/2021	
Events with Partner	Northwest Chamber Connection	3/31/2021	
Events with Partner	IHCC April Membership Meeting	4/15/2021	
Events with Partner	IHCC Back to Business Networking Rooftop	7/28/2021	
Events with Partner	Black-Owned Business Recovery Through Covid – Thriving Through the	,,20,2021	
Organizations	Pandemic (St. Louis Urban League)	2/16/2022	MO
Events with Partner	Goldman Sachs 10kSB - Access to Capital for Black, Latinx, and Women	2, 10, 2022	
Organizations	Business Owners	3/10/2022	Ш
Events with Partner	Marketing & Branding – Being the Leader of Your Brand (STL Urban	3/22/2022	
Events with Partner	Marketing & Branding – Being the Leader of Your Brand (STL Orban	3/23/2022	
Expo/Trade Show	Black Women Expo Vendor Participation	8/23/2021	
External Publication	Madison 365	2/25/2022	
External Publication	LA Ley Radio Interview	3/15/2022	
	Chicago Urban League Center for Entreprenurs:BMO presents:	5, 15, 2022	
External Publication	Demystifiying the Lending Process	3/10/2022	11
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Meetings with partner or prospective organizations Meetings with partner or prospective organizations

;	Nextstreet	11/30/2020 IL
5	IL DECO	12/4/2020 IL
,	City of Aurora Mayor's Office	12/11/2020 IL
;	IHCC-Expo	12/18/2020 IL
5	Illinois Facility Funds	1/20/2021 IL
;	Chicago Police Department - District 15	1/21/2021 IL
;	City of Chicago Regional Business Centers	1/27/2021 IL
;	Far South Community Development Corporation	1/27/2021 IL
	BLC Business Leadership Council - Women In History	2/1/2021 IL
;	CLN Chicago Latino Network	2/4/2021 IL
;	Quad Communities Development Corporation	2/5/2021 IL
;	IHCC Roundtable	2/9/2021 IL
;	McKinsey	2/9/2021 IL
;	Allies for Community Business	2/10/2021 IL
5	Woodlawn Chamber of Commerce	2/10/2021 IL
;	Chicago Urban League - Business Resiliency of Black Owned Businesses	2/11/2021
;	Rebuild The Hood	2/18/2021 IL
	IHCC April Membership Meeting	2/19/2021 IL
	IHCC for the 4/15 BMO/IHCC Meeting	2/19/2021 IL
	NAWBO - Program Introduction	2/22/2021 IL
	HACIA (American Construction Industry Association)	3/31/2021 IL
;	Women Belong Circle-Rogers Park	4/29/2021 IL
;	Consulate General of Mexico	5/3/2021 IL
;	EforALL	5/5/2021 IL
;	ThinkSMARK	5/20/2021
5	SBDC Minnesota	6/1/2021 MN
;	Melrose Park Chamber of Commerce	6/2/2021 IL

Meetings with partner or prospective organizations **Other External Events Other External Events Other External Events** 

Lakeside Alliance	6/4/2021
SCORE Chicago	7/8/2021 IL
Latinos Progresando	7/8/2021 WI
West Central Association	7/14/2021 IL
Allies for Community Business	7/14/2021 IL
ThinkSMARK	7/19/2021 IL
United Way Minnesota	7/27/2021 MN
UMOS	7/28/2021
WWBIC Wisconsin Women's Business Initiative Corporation	7/28/2021 WI
Florida State Hispanic Chamber	8/4/2021 FL
Founders 1st	8/4/2021 IL
SBDC Kansas	8/4/2021 KS
BizStarts	8/9/2021 WI
CICF	8/10/2021 IN
Justine Petersen	8/11/2021 MO
State Representative Debbie Myers-Martin _South Suburbs	8/11/2021 IL
Meeting with State Representative Debbie Myers-Martin	8/11/2021 IL
Neighborhood Development Center	8/12/2021 MN
CRF	8/12/2021
DreamSpring	8/13/2021 FL
African American Alliance	8/20/2021 MN
Operation Hope	8/25/2021 MO
Lakeside Alliance	8/25/2021 IL
NAACP DuPage County	8/25/2021 IL
Asendus	8/27/2021 FL
Chicago Urban League - Planning Village of Broadview WIFR TV Rockford I Heart Media-1390AM	IL 12/4/2020 IL 12/9/2020 IL 1/13/2021 IL

Other External Events Other External Events Other External Events Other External Events **Other External Events Other External Events** Other External Events Other External Events Other External Events Other External Events **Other External Events** Other External Events Other External Events Other External Events **Other External Events Other External Events** Other External Events Other External Events Roundtable Roundtable Roundtable Roundtable Roundtable

iHeart Radio	1/13/2021 IL
10th District Business Meeting - Chicago Police Dpt.	1/27/2021 IL
African American Austin Business Network Assoc	2/26/2021 IL
The Chicago Crusader	3/19/2021 IN
WVON Level Up Competition	4/13/2021 IL
WVON Level Up Competition	4/23/2021 IL
IHCC Breakfast	7/1/2021 IL
CLN Chicago Latino Network	7/22/2021 IL
BMO Celebrating Women Grant Program	8/16/2021
Little Village/Score	8/19/2021 IL
Latina Expo-	10/1/2021 IL
Latina Expo- How to obtain business credit	10/2/2021 IL
Latina Expo	10/3/2021 IL
Latinx Talks	1/27/2022 IL
Social Rush Hour (Bri's 2-day networking event)	3/24/2022 IL
Social Rush Hour (Bri's 2-day networking event)	3/25/2022 IL
Milwaukee Bucks Founder's Club: Challenging the Status Quo	2/28/2022 WI
City of Chicago Treasurer's Symposium	4/12/2022 IL
Illinois Market	5/12/2021 IL
Wisconsin Market	5/20/2021 WI
Illinois Market	6/17/2021 IL
Arizona and Florida Market	8/25/2021 AZ
Minnesota Market	2/25/2022 MN

#### Exhibit 3

Organization	Туре	Event	Market
Growing Home	Non-profit	Financial Literacy Class	IL
		Evganston Community Day - Building Black	
Dearborn REALTIST Board	Non-profit	Wealth Through Homeownership	IL
Habitat for Humanity Chicago	Non-profit	Homebuyer University	IL
NW HomeStart - Rockford	Non-profit	Financial; Literacy Series	IL
NW HomeStart - Rockford	Non-profit	Financial; Literacy Series	IL
NW HomeStart - Rockford	Non-profit	Financial; Literacy Series	IL
NW HomeStart - Rockford	Non-profit	Financial; Literacy Series	IL
LUCHA	Non-profit	First Time Homebuyers Seminar	IL
Habitat for Humanity Chicago	Non-profit	Habitat University	IL
Habitat for Humanity Chicago	Non-profit	Habitat University	IL
Habitat for Humanity Chicago	Non-profit	Habitat University	IL
Spanish Coalition for Housing	Non-profit	Homebuying Webinar	IL
Habitat for Humanity Chicago	Non-profit	Habitat University	IL
Spanish Coalition for Housing	Non-profit	Homebuying Webinar	IL
Northside Community Development			
Corporation	Non-profit	Homebuying Webinar	IL
The Resurrection Project	Non-profit	Homebuying Webinar	IL
Chicago Urban League	Non-profit	Homebuying & Financial Seminar	IL
Hope Chicago	Non-profit	Homebuying & Financial Seminar	IL
West Cook Housing	Non-profit	Homebuying & Financial Seminar	IL
Home DuPage	Non-profit	Homebuying & Financial Seminar	IL
South Suburban Housing Center	Non-profit	Homebuyer Education Seminar	IL
Alliance	Non-profit	Homebuyer Education Seminar	IN
Coldwell Banker Richard Ellis (CBRE)	Corporate	Financial Education for Employee Groups	IL
Growing Home	Non-profit	Financial Education for Employee Groups	IL
Chicanos Por La Causa	Non-profit	Financial Literacy Webinar	AZ
Newtown CDC	Non-profit	Financial Literacy Webinar	AZ
Trellis	Non-profit	Financial Literacy Webinar	AZ
Community Solutions 360	Non-profit	Financial Literacy Webinar	FL
Step Up Suncoast	Non-profit	Financial Literacy Webinar	FL
The Immokalee Foundation	Non-profit	Financial Literacy Webinar	FL
Advantage Housing	Non-profit	Financial Literacy Webinar	IN
Indy Gateway	Non-profit	Financial Literacy Webinar	IN
Near East Area Renewal	Non-profit	Financial Literacy Webinar	IN
Habitat for Humanity KC	Non-profit	Financial Literacy Webinar	КС
NHS of Kansas City	Non-profit	Financial Literacy Webinar	КС
Westside Housing	Non-profit	Financial Literacy Webinar	КС
The Housing Partnership	Non-profit	Financial Literacy Webinar	STL
UCC-United Community Center	Non-profit	Homebuyer Webinar	WI
ACTS Housing	Non-profit	Homebuyer Webinar	WI
Take Root Milwaukee	Non-profit	Homebuyer Webinar	WI
WWBIC	Non-profit	, Homebuyer Webinar	WI
HRI	Non-profit	, Homebuyer Webinar	WI
Bank On Greater Milwaukee	Non-profit	, Financial Education	WI
The Cathedral Center	Non-profit	Financial Education	WI
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Gee's Clippers	Corporate	Financial Education	WI
PEARLS for Teen Girls, Inc.	Non-profit	Financial Education	WI
WHEDA	Non-profit	Homebuying Seminar	WI
Realty Among Friends	Non-profit	Homebuying Seminar	WI
Project REACH Milwaukee	OCC		WI
TGR Realty	Corporate	Homebuyer Webinar	WI
NIDC City of Milwaukee	Civic	Homebuyer Webinar	WI
Riverwest Food Pantry	Non-profit	Financial Education	WI
Movin' Out	Non-profit	Homebuyer Webinar	WI
PRG Inc.	Corporate	Homebuyer Webinar	MN
Frazier Realty	Corporate	Homebuyer Webinar	MN