

PAV & LMSDI Comments on the Proposed Changes to
the Community Reinvestment Act (CRA)
In Docket No. R-1723 and RIN 7100-AF94

Board of Governors of the Federal Reserve System

Submitted - February 15, 2021



Federal Reserve Building, Washington D.C

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Board of Governors of the Federal Reserve System

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About Parents Against Violence



PARENTS AGAINST VIOLENCE

In 2018, Rev. Eleanor Williams and Parents Against Violence (PAV) along with the North Side Partnership Project, purchased the closed

McNaugher School in Perry North. Since that time, the organization has opened and used the facility to sponsor dance team competitions, provide tutoring for middle and high school students, host sewing and drama clubs, and provide a night gym for area youth.

When the COVID-19 pandemic slowed the economy last spring, the PAV youth sewing club made face masks and the organization distributed food along with personal and household essentials to people in need throughout the community. PAV's summer program includes a reading club, an art class for kids, basketball tournaments, and an Underground Railroad STEAM mural project.

PAV collaborates with other community organizations to fulfill neighborhood needs. These partners include the Pittsburgh Project, University of Pittsburgh, Carlow University, Community College of

Allegheny County, American Heart Association, and Pittsburgh Community Services, Inc. PAV estimates that in the past two years, it has served more than 3,100 people.

Despite the successes of PAV's partnerships and the McNaugher School redevelopment, the surrounding neighborhoods remain threatened by the large number of blighted and abandoned properties. These abandoned structures — some privately owned and some owned by the City — place future projects at risk. Unchecked, blight will continue to spread throughout Marshall-Shadeland. To avoid this, PAV developed its Lower Marshall-Shadeland Development Initiative. The Initiative is a community-intensive effort to inventory abandoned lots and structures, and conduct one-on-one community engagement with neighbors and business owners and makes recommendations such as restoration, new construction, or open space greenways. The Initiative is a strategic program that can lead to a formal marketing program directed at the private market and supported by public and private financing incentives.

About the Lower Marshall-Shadeland Development Initiative



PARENTS AGAINST VIOLENCE created its affiliate, Lower Marshall-Shadeland Development Initiative (LMSDI), to assist with controlling blight and maintain the

neighborhood's value and character.

Goals of LMSDI:

- Keep homes in Lower Marshall-Shadeland affordable;
- Safeguard homeowners' investments and improve access to affordable housing; and
- Establish a neighborhood stabilization program focused on tax abatement, homestead exemptions, housing restoration, and new infield construction.

The Lower Marshall-Shadeland Development Ini-

tiative is an attempt to address the most blighted properties and vacant lots. LMSDI seeks to work in partnership with the City of Pittsburgh, Urban Redevelopment Authority, Housing Authority of the City of Pittsburgh, and other private sector partners to overcome the challenges presented by these parcels. LMSDI's approach is modeled on The Lotus Campaign, an affordable housing development program in Charlotte, North Carolina.

The Lotus Campaign finds investment partners to purchase, rehabilitate, and build properties to house people experiencing homelessness and to create affordable workforce housing. LMSDI also plans to research and pilot new construction techniques and materials to help test and champion innovative ways to build more cost effectively. The end product will be an economically, architecturally, and socially diverse neighborhood that is pedestrian friendly and progressively designed.

Acknowledgments

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Special Acknowledgments



Manchester Residents and Others Organized and Created the CRA Movement in Pittsburgh, PA

Early in 1988, several black Manchester residents met to discuss the Federal Community Reinvestment Act and what it meant to the Manchester community and the city of Pittsburgh. Through their tireless work, they raised funds from an anonymous foundation and formed the Pittsburgh Community Reinvestment Group (PCRG). PCRG was incorporated in 1990. Early staff members included Rhonda

Brandon*, John Metzger, PhD, Carol Peterson*, Nancy Schaffer, Dan Holland, PhD, and Stanley Lowe. The motto for the organization was “Research, research and more research”. Betty Jane Ralph*, Arthur Ralph*, Linda Jo Nelson*, Virginia Barnes*, Roberta Bowra, Harriet Henson*, Aggie Brose*, and Dolores Swartworth* were extremely instrumental as they understood that equal lending patterns and practices were not occurring in Pittsburgh’s neighborhoods.



Gale Cincotta, Mother of the Community Reinvestment Movement in America

In 1976, Gale Cincotta announced the formulation of new a policy that ultimately became the Community Reinvestment Act (CRA). She propounded the notion that it was immoral for banks to take the deposits of people in one community and lend them for investment in another community. Behind this idea was the belief, held by many not in business, that businesses can easily operate at a profit and constraining their actions for social purposes imposes no cost on their operations.

According to Gale Cincotta’s belief, banks have a duty to lend to people in the neighborhood where they operate. Cincotta’s ideas caught the attention of William Proxmire, a U.S. Senator for Wisconsin. Proxmire’s background was in journalism and he saw no problem in forcing banks to lend to people in the neighborhoods where they operate even if such loans cannot be justified on the basis of profitability. Proxmire believed that something like Cincotta’s proposal would be required to end racial discrimination of banks.



Senator William Proxmire

Senator William Proxmire, former Chairman of the Senate Banking Committee, assisted with engineering the passage of the Community Reinvestment Act. He acknowledged “many creditworthy areas (were) denied loans,” and the trend, he argued, “undoubtedly aggravates urban decline.” CRA was included in the Housing and Community Development Act of 1977 and was signed into law by President Jimmy Carter on October 12, 1977.



Congressman Henry S. Reuss

Congressman Henry S. Reuss was instrumental in developing and sponsoring the Federal Community Reinvestment Act. He stated “the purpose of this Act is to require each appropriate federal financial supervisory agency to use its authority, when chartering and regulating financial institutions, to encourage such institutions to help meet the credit needs of the local communities in which they are chartered.”

**Deceased*

Introduction

PARENTS AGAINST VIOLENCE (PAV) and the Lower Marshall-Shadeland Development Initiative (LMS-DI) respectfully submits these comments on the proposed changes to the Community Reinvestment Act (CRA) in Docket No. R-1723 and RIN 7100-AF94. Our comments reflect a long history with the CRA dating back to the 1980s; with recent data concerning financial institution investment in low- and moderate-income communities in Pittsburgh, with a particular focus on the low- and moderate-income minority neighborhood of Marshall-Shadeland located on the city's North Side. We strongly believe that financial institutions have an affirmative and ongoing commitment to ascertain the needs of the communities in which they operate. Unfortunately, recent data suggest otherwise. The regulatory environment has enabled banks to make commitments and build relationships without results, hence the proliferation of vacant properties and gentrification are found in many urban markets. Most significantly, CRA needs to be modernized in a way that holds financial institutions accountable to the needs of low- and moderate-income and minority borrowers. CRA also needs to reflect a deep commitment from banks to meet the needs of low- and moderate-income communities as well. Black lives and Black loans should matter in cities like Pittsburgh. We believe that, with a stronger CRA regulatory environment where banks are held to stricter standards, a greater commitment to minority lending can be achieved.

In 1968, the Kerner Commission presented their report to the president and concluded that, "Our nation is moving toward two societies, one black, one white--separate and unequal. Reaction to last summer's disorders has quickened the movement and deepened the division. Discrimination and segregation have long permeated much of American life; they now threaten the future of every American...

What white Americans have never fully understood but what the Negro can never forget--is that white society is deeply implicated in the ghetto. White institutions created it, white institutions maintain it, and white society condones it."¹ In many respects, little has changed since 1968. In fact it is our contention that, despite the passage of the Community Reinvestment Act of 1977 and subsequent advancements made during the late 1980s and early 1990s, progress has stalled. It is our attempt with these comments to provide background to the CRA as a justification for our recommendations for how it can be improved.

The summer of 2020 witnessed an outpouring of demonstrations for Black Lives Matter galvanized by the cell phone video of a white police officer kneeling on the neck of George Floyd in Minneapolis. In June 2020, the world witnessed a mass mobilization of people seeking to change the way minorities (African Americans in particular) are treated by government and private institutions. Thousands of people marched in the streets across America and across the world, calling for reforms to what Isabel Wilkerson calls "America's enduring racial caste system."² But when regulators and the community hold banks accountable to communities, the CRA can in part reverse these negative effects in neighborhoods that have long been excluded by the private market. In the past decade, however, some financial institutions have failed to meet the needs of low- and moderate-income and minority communities; these same institutions have been given a passing grade to continue to do business as usual — ignoring minority communities—while reaping the benefits that come from regulatory approval. It is as if the proverbial knee remains on the neck of African American communities across America.

¹ "Report of the National Advisory Commission on Civil Disorders," U.S. Government Printing Office, 1968, 1

² Isabel Wilkerson, "America's Enduring Racial Caste System," *New York Times Magazine*, July 5, 2020.

Putting “Community” Back in Community Reinvestment

RECENT SCHOLARSHIP ON EXCLUSIONARY LENDING in America emphasizes the need for geographic approaches to reinvestment.³ Legal remedies to address redlining, such as the Fair Housing Act of 1968, as well as the Kerner Commission recommendations, “largely ignored the program of geographic mortgage redlining and housing disinvestment in cities by financial institutions,” concludes John T. Metzger in his dissertation, “Social Capitalism in American Cities: Financial Institutions and Community Development” (1999).⁴ Today there is a strong emphasis on lending to minorities, but not necessarily to minority neighborhoods.

From its inception, the Community Reinvestment Act of 1977 was intended to be a geographically-focused effort to reverse decades of financial institution disinvestment in low-income and minority communities. Metzger’s dissertation challenged the “neighborhood life cycle theory” that assumed that “urban neighborhoods which were predominantly African American or low- and moderate-income were not economically viable.”⁵ Long before the FIRREA reforms of 1989, which required lending data disclosure by race and income, financial institutions were only required to disclose loans by census tract, according to the Home Mortgage Disclosure Act of 1975. Of course, race and geography are intertwined, but the overall thrust of the CRA was designed to reinvest in economically distressed geographies. Use of the data by community-based organizations helped stimulate lending in these distressed areas. As Greg Squires writes, “These data have proven useful to community groups around the country in tracking the flow of mortgage money by neighborhood throughout metropolitan areas.”⁶

One of those responsible for drafting language for the CRA, Alan Herlands of the Office of the Comptroller of the Currency, explained that “It was not that the communities were not credit worthy, or borrowers were not credit worthy, but that the banks were making poor business decisions and doing what was convenient, which was going only to the affluent suburbs, only to the large borrowers. If the banks would only look in their own back yards, and spend a little bit of time with it...they would find profitable business opportunities. And they needed to be encouraged to do that...to look locally.”⁷ Today, we still see evidence of this type of activity by certain financial institutions.

When the *Atlanta Journal-Constitution* published “The Color of Money” (1988), it set off a wave of reinvestment activity in cities across America, most notably in Pittsburgh. We were part of that movement here in Pittsburgh when we formed the Pittsburgh Community Reinvestment Group (PCRG) in 1988 as a way for communities to work with financial institutions to more effectively direct home mortgage loans to low- and moderate-income (LMI) and African American neighborhoods. For a time, it seemed to work. A number of innovative loan products, services, and branches tailored to the needs of LMI and African American communities emerged. Among the programs developed included the “Ain’t I A Woman” Program, “The Upstairs/Downstairs” Program, the before Comprehensive Neighborhood Development Initiative, the Housing Recovery Program, the Community Lender Credit Program and many others.

The numbers tell the strongest story: Between 1991 and 1995, twelve financial institutions working with

PCRG approved 13,633 home mortgage loans to black and white borrowers. Of these, 2,059 loans, or 15.1% of the total, were approved to black applicants. There were 11,574 loans approved to white applicants, or 84.9% of the total (see Table 1).⁸ Pittsburgh led a movement that spread to nearly every city across the country. According to the Na-

tional Community Reinvestment Coalition, since the CRA was passed in 1977, “lenders and community organizations have signed over 446 CRA agreements totaling more than \$4.5 trillion in reinvestment dollars flowing to minority and lower income neighborhoods.”⁹ In the last decade, however the numbers tell a different story.

Table 1. All Banks Lending in Pittsburgh 2009-2018 versus 1991-1995

	City of Pittsburgh	% of City Total
23 Banks Lending to African Americans in Pittsburgh and Allegheny County, 2009-2018 (1)	1,406	7.0%
23 Banks Total Lending, 2009-2018 (1)	20,230	—
12 Banks Lending to African Americans in the City of Pittsburgh, 1991-1995 (2)	2,059	15.1%
12 Banks Lending to Whites in the City of Pittsburgh, 1991-1995 (2)	11,574	—
Total, Both Races	13,633	

Notes:

¹ Calculated from PCRG Lending Study 2020.

² PCRG Lending Study 1996, 85-86.

³ These include books by Richard Rothstein, *The Color of Law: A Forgotten History of How Our Government Segregated America* (2017), and Mehrsa Baradaran, *The Color of Money: Black Banks and the Racial Wealth Gap* (2017). See also “Mapping Inequality Redlining in New Deal America,” University of Richmond, <https://dsl.richmond.edu/panorama/redlining/#loc=5/39.1/-94.58>

⁴ John T. Metzger, *Social Capitalism in American Cities: Financial Institutions and Community Development*. PhD Dissertation, Columbia University, 1999, 126.

⁵ Metzger, *Social Capitalism in American Cities*, 61.

⁶ Gregory D. Squires, “Community Reinvestment: An Emerging Social Movement,” in Gregory D. Squires, Editor, *From Redlining to Reinvestment: Community Responses to Urban Disinvestment*. Philadelphia: Temple University Press, 1992, 11

⁷ Quoted in Metzger, *Social Capitalism in American Cities*, 140.

⁸ “Neighborhood Lending Report,” Pittsburgh Community Reinvestment Group, 1996, 85-86.

⁹ “CRA Commitments,” National Community Reinvestment Coalition, September 2007, 4.

A Rollback of CRA Commitments: The Reinvestment Thesis

SINCE THE 1990s, however, a reinvestment trend has swept across urban America, with financial institutions leading the charge, approving home mortgages in neighborhoods formerly neglected by lenders in prior decades. Dozens of community-bank relationships persist in cities across the United States. Despite these efforts, the results have lagged and disparities have widened, especially since the Great Recession.

The difference between lenders' commitments in the 1990s and in the past decade is stark. Between 2009 and 2018, twenty-three banks approved 1,406 loans to African Americans in the city of Pittsburgh, just seven percent of the 20,230 total approved citywide (see Table 1).¹⁰ Our latest analysis shows that in the past thirteen years, from 2007 to 2019, financial institutions approved only 3.5% of loan dollars to African Americans (see Table 2). *In other words, over the past decade, twice as many lenders made half as many loans in twice the amount of time as they did twenty-five years ago.*

The result of this recent reinvestment activity has been a back-to-the-cities movement, featuring not just young professionals and empty nesters seeking authentic neighborhoods close to the urban core, but also investors looking to extract profits out of low-cost properties in low- and moderate-income and minority communities that can be rented or sold at huge profits. One unintended consequence was the gentrification of cities large and small across the United States, as well as in Europe. Numerous scholars have addressed this issue on both sides of the Atlantic.¹¹

One outcome has been an outmigration from cities of low- and moderate-income African Americans and an influx of higher-income whites. This quieter form of “root shock” (with credit to Mindy Thompson Fullilove) did not come on the heels of a massive federal relocation program, as it did with urban renewal in the 1950s and 1960s. In recent decades, the private sector — a network of financial institu-

tions, real estate agents, insurance companies, and investors — pursued community reinvestment simply in the name of profit. This trend created what we call the “reinvestment thesis” — the idea that all banks are doing the “right thing” by investing in underserved neighborhoods, that financial institutions are meeting their mandated requirements under the Community Reinvestment Act, and that regulators appropriately and accurately reward these reinvestment efforts. It has also led to “grade inflation” by federal financial institution regulators, which gave more than 98% of all banks a passing evaluation.¹²

But not all banks are evaluated equally, nor are they evaluated accurately. Small banks (those with asset sizes under \$1.305 billion) are evaluated under a streamlined CRA exam.¹³ Whereas large banks are subjected to increased scrutiny in lending, services, and investments, small banks are not held to the same standards. The problem is that some banks are not living up to the spirit of the CRA, despite passing grades. *How can banks in Pittsburgh receive Satisfactory or better CRA ratings while making just seven percent of their loans to African Americans?*

When lending by neighborhood is examined, more disparities are evident. Our calculations show that between 2007 and 2019, financial institutions approved 71,252 loans for \$11.8 billion dollars in city of Pittsburgh neighborhoods. However, in Pittsburgh's 24 minority neighborhoods, just 10.2% of the loans (7,269) and 7.2% of the loan dollars (\$841,933,000) were approved. So, while more than \$11 billion in loans were approved to city neighborhoods in 13 years, less than \$900 million dollars went to minority neighborhoods. In Pittsburgh's East Liberty neighborhood, which has seen an influx of new development (Whole Foods, Target, Google, and other big developments), just 1.6% of loan dollars were approved. Meanwhile, the adjacent high-income white neighborhood of Shadyside saw more than a billion dollars of home mortgage lending, or nine percent of the city total. Furthermore, our research

shows that more loans and loan dollars were approved to whites in minority neighborhoods than to African Americans. In other words, not only are minority neighborhoods being redlined, but minorities in minority neighborhoods are being excluded from wealth-building opportunities. These lending disparities exacerbate existing racial inequalities in Pittsburgh, as noted by a 2019 study.¹⁴

The tables that rank the top ten lenders to African Americans and to minority neighborhoods from 2007 to 2019 reveal how Dollar Bank and PNC Bank dominate lending in the city of Pittsburgh. Clearly Dollar Bank, which has an Outstanding CRA rating, has figured out how to capture the top of the minority lending market. Will other lenders follow suit? The figures also demonstrate the primacy of internet banks, which have no branches and no commitment to the Community Reinvestment Act. Among the top ten in each table is Quicken Loans, the nation's largest lender. Wells Fargo, among the top five in loans and loan dollars, was fined \$3 billion in 2020 by the federal government due to millions of fake accounts created at the bank over many years.¹⁵ Not listed are dozens of institutions which have approved no loans to African Americans or minority communities. Finally, compared to loan dollars approved to whites (\$7.6 billion in thirteen years), loan dollars to African Americans (\$419 million), are only 3.5% of the total (\$11.8 billion), the same percentage as loan dollars

to Asians, who are only five percent of the population. There is great potential for growing the mortgage loan market to African Americans and minority neighborhoods.

The federal regulatory environment does not instill confidence that these disparities will be dealt with equitably, or at all. Financial institutions, which made billions of dollars off the backs of LMI and minority borrowers, were just as complicit in the disparities as the regulators. Only on rare occasions are financial institutions held accountable to the law. For instance, the chairman of Taylor Bean & Whitaker, which approved 147 loans for \$15.6 million in Pittsburgh neighborhoods (particularly minority neighborhoods) between 2007 and 2011, was convicted of fraud by the U.S. Justice Department in 2011.¹⁶ Headlines that describe a situation in which "at least six investigations into discriminatory mortgage loan 'redlining' have been halted or stalled" by the OCC, or that the former U.S. Treasury Secretary was once known as the "foreclosure king" for his role with OneWest lead us to conclude that the regulators, like the banks, could care less about low- and moderate-income and minority communities.¹⁷ Pittsburgh's minority communities deserve better. We believe that since the Great Recession, banks and their regulators have presided over the wholesale disinvestment of minorities and minority communities.

¹⁰ Calculated from PCRG Lending Study 2020.

¹¹ For more on gentrification, see Peter Moskowitz, *How to Kill A City: Gentrification, Inequality, and the Fight for the Neighborhood*. New York: Nation Books, 2017. Schlichman, John Joe, Jason Patch, and Marc Lamont Hill. *Gentrifier*. Toronto: University of Toronto Press, 2017. Cucca, Roberta and Costanzo Ranci, editors. *Unequal Cities: The challenge of post-industrial transition in times of austerity*. Abington, UK: Routledge, 2017.

¹² Josh Silver, "The Community Reinvestment Act: Vital for Neighborhoods, the Country, and the Economy," National Community Reinvestment Coalition, June 2016.

¹³ Small banks are evaluated under five criteria: The institution's loan-to-deposit ratio; the percentage of loans and other lending-related activities located in the institution's assessment area; the distribution of lending among borrowers of different income levels and businesses and farms of different sizes; the distribution of lending among geographies of different income levels; and the institution's record of taking action in response to written complaints about its CRA performance. "CRA Compliance Manual for small banks," Federal Deposit Insurance Corporation, 2020, accessed on July 11, 2020, <https://www.fdic.gov/regulations/compliance/manual/index.html>.

¹⁴ J. Dale Shoemaker, "Pittsburgh's Black residents feel consequences of inequality more starkly than in other U.S. cities, new city report finds. New Pittsburgh report examines racial and gender inequality together for the first time," *Public Source*, September 17, 2019, <https://www.publicsource.org/pittsburghs-black-residents-feel-consequences-of-inequality-more-starkly-than-in-other-u-s-cities-new-city-report-finds/>

¹⁵ Matt Egan, "US government fines Wells Fargo \$3 billion for its 'staggering' fake-accounts scandal," CNN Business, February 24, 2020, <https://www.cnn.com/2020/02/21/business/wells-fargo-settlement-doj-sec/index.html>.

¹⁶ "Former Chairman of Taylor, Bean & Whitaker Convicted for \$2.9 Billion Fraud Scheme That Contributed to the Failure of Colonial Bank," U.S. Justice Department press release, April 19, 2011, <https://www.justice.gov/opa/pr/former-chairman-taylor-bean-whitaker-convicted-29-billion-fraud-scheme-contributed-failure>.

¹⁷ Patrick Rucker, "Trump Financial Regulator Quietly Shelved Discrimination Probes Into Bank of America and Other Lenders," *ProPublica*, July 13, 2020, <https://www.propublica.org/article/trump-financial-regulator-quietly-shelved-discrimination-probes-into-bank-of-america-and-other-lenders> and Sheelah Kolhatkar, "The High-Finance Mogul in Charge of Our Economic Recovery: How Treasury Secretary Steven Mnuchin became one of the most consequential policymakers in the world," *The New Yorker*, July 13, 2020, <https://www.newyorker.com/magazine/2020/07/20/the-high-finance-mogul-in-charge-of-our-economic-recovery>.

Pittsburgh's Marshall-Shadeland Neighborhood as a Model

MARSHALL-SHADELAND IS AN EXAMPLE of the reinvestment thesis. After all, redlining is a thing of the past, right? Just like slavery, Jim Crow, and blatant racism, banks do not actually exclude whole neighborhoods or races of people? The only problem is, data from Marshall-Shadeland reflect a different reality, one in which geographic and racial redlining are alive and well. To be sure, some financial institutions have made progress. Many are responsive to community needs and have developed sophisticated in-house community reinvestment departments. Others, however, are less responsive to community needs at time when the community needs them most.

Located on Pittsburgh's North Side, the mostly residential Marshall-Shadeland has historically been the victim of negative stereotypes. A HOLC redlining map from the 1930s indicated that it was "One of the toughest sections of Pittsburgh" and "Generally speaking this section is classed as the lower or undesirable type" (Marshall-Shadeland was lumped together with adjacent Manchester and Woods Run).¹⁸ Today, Marshall-Shadeland is an attractive middle-class neighborhood, with the median home value at \$63,109. It is for this reason that the housing stock is considered to be "naturally occurring affordable housing" (NOAH), absent government subsidies. In addition, Marshall-Shadeland is ranked 11th for number of veterans out of 90 Pittsburgh neighborhoods. Finally, it is a community that is nearly evenly divided between white (47%) and black (43%), rare for Pittsburgh.¹⁹

Working with Carnegie Mellon University, Parents Against Violence, along with its subsidiary, Lower Marshall-Shadeland Development Initiative (LMSDI) analyzed financial institution lending to Marshall-Shadeland over a thirteen-year period,

2007 to 2019. There are 147 lenders which reported HMDA information for Marshall-Shadeland during these years. These lenders approved 670 mortgage loans for \$42,131,000 in the neighborhood. Of these loans, 159 were approved to blacks (23.7%) and 363 were approved to whites (54.2%). Most of the lenders doing business in Marshall-Shadeland do not have a brick-and-mortar presence there. These include lenders such as Quicken Loans, Nextier Bank, Alterra Group LLC, Guaranteed Rate LLC, Nationstar Mortgage, and Loandepot, LLC. Still, the disparities are clear: just \$9,191,000 in home mortgage loan dollars were approved to African Americans, while whites received \$21,550,000 in loan dollars over the thirteen-year period.

But the biggest disparities exist when we examine the lending records of banks with branches in or near Marshall-Shadeland. These include First National Bank (with a branch location in the adjacent Observatory Hill neighborhood), Key Bank (Manchester), WesBanco (Woods Run), and SSB Bank (formerly Slovak Savings & Loan Bank), which started in Marshall-Shadeland in 1922 and is the only bank with a branch location in the neighborhood (SSB has just one other branch location, in the North Hills suburbs). Over a thirteen-year period, these four banks approved 88 loans for \$6,175,000 in Marshall-Shadeland.

The disparities in lending are stark when lending by race is examined. The four banks approved just 19 loans to African American borrowers, or 21.6% of the total loans in thirteen years. Meanwhile, whites received 55 loans, or 62.5% of the total loans. African Americans received just \$947,000 in loan dollars, or 15.3% of all loan dollars, by the four banks in thirteen years. Whites, on the other hand, received \$2,816,000, or 45.6% of all loan dollars.

Individually, the banks' lending records showed the greatest disparities. Of the four banks with branch locations in or near Marshall-Shadeland, Key Bank approved seven loans to African Americans. First National Bank and WesBanco approved five loans each to African Americans. And SSB, which has had a presence in Marshall-Shadeland for nearly 100 years, approved just two loans to African Americans in thirteen years. Each one of these institutions received "Satisfactory" or better CRA ratings.

Furthermore, SSB Bank moved its headquarters to a new branch far outside the city in the North Hills, continuing to turn its back on its own roots in Marshall-Shadeland. This small bank, with assets less than \$200 million, then expanded its assessment area "to include all of (rather than portions of) Allegheny County as well as 17 tracts within Butler County and 74 tracts within Westmoreland County. The bank's assessment area now consists of 493 contiguous census tracts, comprised of Allegheny County in its entirety and portions of Westmoreland and Butler Counties."²⁰ The bank cast such a wide net that it is nearly impossible not to make a loan to a minority, yet its scope is so wide that it can easily disregard its home neighborhood. It seems inconceivable to us how SSB Bank approved two loans to African Americans for \$44,000 in thirteen years in a neighborhood where it has maintained a branch for nearly a century. Furthermore, as the tables below indicate,

Marshall-Shadeland is not even in SSB Bank's top-five neighborhoods for lending. The bank made more loans to neighborhoods far from its branch than it did in the one place it started a century ago. How is it possible that a bank can ignore its own neighborhood and receive a passing CRA grade?

These exclusionary lending patterns were legitimized not only by the federal bank regulators (the Federal Deposit Insurance Corporation in this case), but the community itself. To SSB, consistent "Satisfactory" CRA ratings from the FDIC since 1994 have validated its lending practices. The bank's last CRA exam in 2015 made no mention of the lack of home loans approved in the neighborhood where the bank has maintained a branch since 1930.²¹ Moreover, in 2018, the bank received an award for "Outstanding Minority Lending," from the PCRG, even though it had only made 27 loans to African Americans in the city of Pittsburgh, just seven percent of its loan total, in nine years between 2007 and 2019. To us, these types of egregious disparities are not only a flagrant violation of the Community Reinvestment Act, they may represent a failure on the part of regulators to highlight these shortcomings and suggest corrective action. Marshall-Shadeland neighborhood is literally collapsing around SSB Bank's branch. *How can federal regulators look the other way?*

¹⁸ "Mapping Inequality," University of Richmond. HOLC map from July 1937, <https://dsl.richmond.edu/panorama/redlining/#loc=14/40.453/-80.062&city=pittsburgh -pa & area=D1&adview=full>

¹⁹ 2018 American Community Survey, ACS 1-Year Estimates Data Profiles, U.S. Bureau of the Census

²⁰ Slovak Savings Bank reported assets of \$158,313,000 in 2017, when it filed with the FDIC to convert to a Pennsylvania mutual holding company, SSB Bancorp. Its assessment area is described in the FDIC's 2015 CRA evaluation, p. 4.

²¹ "Community Reinvestment Act Performance Evaluation," Federal Deposit Insurance Corporation, February 23, 2015.

Table 2: All Banks Lending in the City of Pittsburgh by Race, 2007-2019

Demographic Category	2007-2011	2012-2013	2014-2016	2017-2019	2007-2019	% of Total
White Loans	20,596	8,969	11,452	12,346	53,363	74.9%
White Loan \$	\$2,543,142,000	\$1,247,353,000	\$1,735,972,000	\$2,094,046,000	\$7,620,513,000	64.5%
Black Loans	1,969	704	1,138	1,343	5,154	7.2%
Black Loan \$	\$137,890,000	\$53,596,000	\$90,456,000	\$137,200,000	\$419,142,000	3.5%
Asian Loans	599	301	498	689	2,087	2.9%
Asian Loan \$	\$96,298,000	\$56,301,000	\$106,282,000	\$152,652,000	\$411,533,000	3.5%
Islander Loans	47	10	17	19	93	0.1%
Islander Loan \$	\$3,927,000	\$1,624,000	\$1,910,000	\$2,773,000	\$10,234,000	0.1%
AmerIndian Loans	43	32	20	58	153	0.2%
AmerIndian Loan \$	\$4,386,000	\$4,574,000	\$2,188,000	\$6,467,000	\$17,615,000	0.1%
Missing/NA Loans*	3,577	1,859	2,208	2,758	10,402	14.6%
Missing/NA Loan \$*	\$624,359,000	\$549,987,000	\$1,094,752,000	\$1,059,642,000	\$3,328,740,000	28.2%
Total Loans	26,831	11,875	15,333	17,213	71,252	100%
Total Loan \$	\$3,410,002,000	\$1,913,435,000	\$3,031,560,000	\$3,452,780,000	\$11,807,777,000	100%

* For the "Missing/NA" category, HMDA always includes a number of loans that don't have data in some fields. This could be a collection error, a deliberate removal of data, or the applicant not filling everything out. It depends on the particular variable that is examined, but other studies just exclude those loans or include them as their own category, depending on the circumstance.

Table 3: All Banks Lending to Pittsburgh Neighborhoods, 2007-2019 (Ranked by Loan Dollars)

Neighborhood	Population	Percent Minority	Total Loan \$	% of Total	Total Count Loans	% of Total
Shadyside	13,562	34.9%	\$1,054,017,000	8.93%	3,495	4.91%
Squirrel Hill South	16,042	21.2%	\$1,045,706,000	8.86%	4,333	6.08%
Squirrel Hill North	11,336	25.7%	\$956,579,000	8.10%	2,872	4.03%
Point Breeze	5,409	13.9%	\$595,853,000	5.05%	2,469	3.47%
South Side Flats	6,292	7.8%	\$532,039,000	4.51%	2,593	3.64%
Highland Park	6,783	35.1%	\$463,237,000	3.92%	2,289	3.21%
Brookline	13,160	12.0%	\$419,070,000	3.55%	4,895	6.87%
Central Business District	4,060	23.4%	\$380,999,000	3.23%	800	1.12%
Mount Washington	8,743	16.1%	\$368,518,000	3.12%	2,704	3.79%
Central Lawrenceville	4,775	16.2%	\$359,367,000	3.04%	1,733	2.43%
Bloomfield	8,669	14.8%	\$327,000,000	2.77%	2,195	3.08%
Strip District	747	16.9%	\$318,499,000	2.70%	244	0.34%
Greenfield	7,690	18.0%	\$272,784,000	2.31%	2,529	3.55%
Lower Lawrenceville	2,572	28.0%	\$231,598,000	1.96%	816	1.15%
Brighton Heights	7,421	24.3%	\$230,032,000	1.95%	2,431	3.41%
Central Northside	2,892	46.4%	\$218,797,000	1.85%	1,226	1.72%
North Oakland	9,602	43.0%	\$192,155,000	1.63%	551	0.77%
East Liberty	5,537	68.1%	\$186,588,000	1.58%	746	1.05%
South Side Slopes	4,583	8.6%	\$178,558,000	1.51%	1,472	2.07%
Stanton Heights	4,761	38.8%	\$170,962,000	1.45%	1,797	2.52%
Westwood	3,851	25.5%	\$161,665,000	1.37%	1,256	1.76%
Duquesne Heights	2,522	3.8%	\$152,502,000	1.29%	1,003	1.41%
Beechview	8,078	23.0%	\$147,946,000	1.25%	2,064	2.90%
Carrick	10,122	22.5%	\$144,042,000	1.22%	2,243	3.15%
Morningside	3,262	18.8%	\$142,398,000	1.21%	1,254	1.76%
Troy Hill	2,283	20.6%	\$140,852,000	1.19%	638	0.90%
Banksville	3,858	22.5%	\$134,547,000	1.14%	1,194	1.68%
Upper Lawrenceville	2,754	20.4%	\$132,896,000	1.13%	853	1.20%
Allegheny West	1,754	38.0%	\$126,960,000	1.08%	160	0.22%
Friendship	1,840	42.6%	\$123,157,000	1.04%	296	0.42%

Neighborhood	Population	Percent Minority	Total Loan \$	% of Total	Total Count Loans	% of Total
Perry North	3,771	35.4%	\$106,226,000	0.90%	1,214	1.70%
East Allegheny	2,300	32.7%	\$102,613,000	0.87%	549	0.77%
Central Oakland	5,822	19.7%	\$87,690,000	0.74%	334	0.47%
Overbrook	3,682	9.1%	\$82,990,000	0.70%	1,167	1.64%
Regent Square	1,033	1.9%	\$82,976,000	0.70%	460	0.65%
Point Breeze North	1,732	41.2%	\$80,025,000	0.68%	462	0.65%
South Oakland	2,921	29.0%	\$79,955,000	0.68%	662	0.93%
Crafton Heights	3,964	37.0%	\$77,405,000	0.66%	970	1.36%
Lincoln Place	3,499	1.6%	\$74,809,000	0.63%	1,043	1.46%
Manchester	1,944	71.9%	\$69,793,000	0.59%	477	0.67%
Larimer	1,641	87.4%	\$66,367,000	0.56%	102	0.14%
Swisshelm Park	1,345	10.9%	\$62,349,000	0.53%	552	0.77%
Windgap	3,275	44.5%	\$61,757,000	0.52%	542	0.76%
Garfield	3,966	82.5%	\$57,811,000	0.49%	598	0.84%
Sheraden	5,993	51.7%	\$53,401,000	0.45%	881	1.24%
Crawford-Roberts	2,225	90.9%	\$50,621,000	0.43%	201	0.28%
Hazelwood	5,378	50.8%	\$49,496,000	0.42%	660	0.93%
New Homestead	973	16.9%	\$48,405,000	0.41%	370	0.52%
Perry South	3,398	66.6%	\$47,485,000	0.40%	533	0.75%
Polish Hill	1,331	13.1%	\$43,850,000	0.37%	349	0.49%
Marshall-Shadeland	4,060	51.1%	\$42,131,000	0.36%	670	0.94%
Upper Hill	1,884	85.4%	\$41,373,000	0.35%	314	0.44%
Summer Hill	1,191	17.9%	\$33,724,000	0.29%	402	0.56%
Bluff	6,294	32.4%	\$30,496,000	0.26%	92	0.13%
Oakwood	1,668	16.7%	\$29,977,000	0.25%	359	0.50%
Spring Hill-City View	2,456	40.8%	\$29,548,000	0.25%	489	0.69%
West Oakland	1,717	64.1%	\$27,603,000	0.23%	194	0.27%
Elliott	2,726	36.1%	\$26,169,000	0.22%	405	0.57%
North Shore	2,088	19.1%	\$25,981,000	0.22%	7	0.01%
Allentown	2,558	48.9%	\$25,115,000	0.21%	216	0.30%
Mount Oliver	3,399	41.9%	\$22,816,000	0.19%	434	0.61%

Neighborhood	Population	Percent Minority	Total Loan \$	% of Total	Total Count Loans	% of Total
Fineview	1,270	75.6%	\$22,645,000	0.19%	222	0.31%
Lincoln-Lemington-Belmar	4,735	91.1%	\$17,407,000	0.15%	311	0.44%
Knoxville	4,255	71.0%	\$16,703,000	0.14%	318	0.45%
Beltzhoover	2,622	64.6%	\$16,188,000	0.14%	285	0.40%
East Hills	2,859	94.4%	\$14,852,000	0.13%	221	0.31%
Homewood North	3,371	99.3%	\$13,718,000	0.12%	137	0.19%
Homewood South	2,276	95.6%	\$13,369,000	0.11%	111	0.16%
Arlington	2,124	31.6%	\$13,089,000	0.11%	278	0.39%
Terrace Village	2,292	56.5%	\$11,686,000	0.10%	39	0.05%
California-Kirkbride	803	78.0%	\$11,377,000	0.10%	69	0.10%
Spring Garden	840	22.0%	\$9,781,000	0.08%	154	0.22%
Middle Hill	1,760	87.7%	\$8,562,000	0.07%	121	0.17%
St. Clair	868	48.6%	\$3,212,000	0.03%	60	0.08%
Chateau	3	0.0%	\$1,676,000	0.01%	5	0.01%
Homewood West	850	99.4%	\$1,567,000	0.01%	35	0.05%
Northview Heights	1,545	98.0%	\$846,000	0.01%	12	0.02%
South Shore	12	0.0%	\$475,000	0.004%	3	0.004%
Bedford Dwellings	1,349	98.4%	\$344,000	0.003%	12	0.02%
Totals, All Neighborhoods			\$11,807,777,000	100%	71,252	100%
Totals, 24 Minority Neighborhoods			\$841,933,000	7.1%	7,269	10.2%

Minority neighborhoods are shaded in gray

* For the "Missing/NA" category, HMDA always includes a number of loans that don't have data in some fields. This could be a collection error, a deliberate removal of data, or the applicant not filling everything out. It depends on the particular variable that is examined, but other studies just exclude those loans or include them as their own category, depending on the circumstance.

Table 4: Top Ten Lenders to African Americans in Pittsburgh by Loan Dollars, 2007-2019

Rank	Lender	Loan Dollars to African Americans
1	DOLLAR BANK FSB	\$46,341,000
2	PNC BANK NA (includes PNC Bank NA and PNC Mortgage LLC)	\$30,120,000
3	WELLS FARGO BANK (includes Wells Fargo Bank NA, Wells Fargo Fin'l Pennsylvania, and Wells Fargo Funding)	\$24,395,000
4	HOWARD HANNA FINANCIAL SERVICES	\$17,363,000
5	QUICKEN LOANS	\$15,328,000
6	JPMORGAN CHASE BANK	\$9,973,000
7	RIVERSSET CREDIT UNION	\$9,965,000
8	FIRST NATIONAL BANK OF PA	\$9,132,000
9	WEST PENN FINANCIAL	\$8,173,000
10	BANK OF AMERICA N.A.	\$7,592,000

Table 5: Top Ten Lenders to African Americans in Pittsburgh by Loans, 2007-2019

Rank	Lender	Loans to African Americans
1	DOLLAR BANK FSB	704
2	PNC BANK NA (includes PNC Bank NA and PNC Mortgage LLC)	431
3	RIVERSET CREDIT UNION	265
4	WELLS FARGO BANK (includes Wells Fargo Bank NA, Wells Fargo Fin'l Pennsylvania, and Wells Fargo Funding)	232
5	CITIZENS BANK (includes Citizens Bank of Pennsylvania, RBS Citizens, and Citizens BK NA)	220
6	QUICKEN LOANS	158
7	ALLEGENT COMMUNITY FCU	155
8	HOWARD HANNA FINANCIAL SERVICES	129
9	FIRST NATIONAL BANK OF PA	115
10	WEST PENN FINANCIAL	103

Table 6: Top Ten Lenders to Minority Neighborhoods in Pittsburgh by Loan Dollars, 2007-2019

Rank	Lender	Loan Dollars to African Americans
1	DOLLAR BANK FSB	\$98,840,000
2	PNC BANK NA (includes PNC Bank NA and PNC Mortgage LLC)	\$57,078,000
3	WESBANCO BANK (Includes Fidelity Savings Bank)	\$50,595,000
4	WELLS FARGO BANK (includes Wells Fargo Bank NA, Wells Fargo Fin'l Pennsylvania, and Wells Fargo Funding)	\$35,382,000
5	GS COMMERCIAL REAL ESTATE LP	\$33,250,000
6	HOWARD HANNA FINANCIAL SERVICES	\$25,690,000
7	WALKER & DUNLOP LLC	\$23,595,000
8	FIRST NATIONAL BANK OF PA	\$22,172,000
9	QUICKEN LOANS	\$19,246,000
10	S&T BANK	\$15,883,000

Table 7: Top Ten Lenders to Minority Neighborhoods in Pittsburgh by Loans, 2007-2019

Rank	Lender	Loans to African Americans
1	DOLLAR BANK FSB	835
2	PNC BANK NA (includes PNC Bank NA and PNC Mortgage LLC)	633
3	WELLS FARGO BANK (includes Wells Fargo Bank NA, Wells Fargo Fin'l Pennsylvania, and Wells Fargo Funding)	355
4	CITIZENS BANK (includes Citizens Bank of Pennsylvania, RBS Citizens, and Citizens BK NA)	270
5	FIRST NATIONAL BANK OF PA	257
6	HOWARD HANNA FINANCIAL SERVICES	208
7	QUICKEN LOANS	200
8	RIVERSET CREDIT UNION	182
9	ALLEGENT COMMUNITY FCU	165
10	FIRST COMMONWEALTH BANK	145

Table 8: All Banks Lending to Marshall-Shadeland by Race, 2007-2019

Demographic Category	2007-2011	2012-2013	2014-2016	2017-2019	2007-2019	% of Total
White Loans	150	51	75	87	363	54.2%
White Loan \$	\$7,292,000	\$3,221,000	\$4,358,000	\$6,679,000	\$21,550,000	51.1%
Black Loans	65	15	49	30	159	23.7%
Black Loan \$	\$3,608,000	\$744,000	\$2,783,000	\$2,056,000	\$9,191,000	21.8%
Asian Loans	0	0	2	3	5	0.7%
Asian Loan \$	\$0	\$0	\$208,000	\$285,000	\$493,000	1.2%
Islander Loans	4	0	0	1	5	0.7%
Islander Loan \$	\$182,000	\$0	\$0	\$5,000	\$187,000	0.4%
AmerIndian Loans	0	0	0	1	1	0.1%
AmerIndian Loan \$	\$0	\$0	\$0	\$85,000	\$85,000	0.2%
Missing/NA Loans	46	20	21	50	137	20.4%
Missing/NA Loan \$	\$2,116,000	\$1,873,000	\$2,229,000	\$4,407,000	\$10,625,000	25.2%
Total Loans	265	86	147	172	670	100%
Total Loan \$	\$13,198,000	\$5,838,000	\$9,578,000	\$13,517,000	\$42,131,000	100%

Table 9: Top Lenders in Marshall-Shadeland, 2007-2019 (Ranked by Loan Dollars)

Rank	Lender Name	Number of Loans	Amount
1	DOLLAR BK FSB	61	\$3,860,000
2	PNC BANK NA	47	\$2,407,000
3	WESBANCO BANK (WesBanco Bank and Fidelity Savings Bank)	38	\$2,140,000
4	SSB Bank (Slovak Savings Bank & SSB Bank)	12	\$1,805,000
5	WELLS FARGO (Wells Fargo Bank NA & Wells Fargo Financial Pennsylvania)	26	\$1,585,000
6	S&T BANK	26	\$1,576,000
7	FIRST NATIONAL BANK OF PA	27	\$1,510,000
8	WEST PENN FINANCIAL	21	\$1,428,000
9	PHH (PHH Home loans and PHH Mortgage Corporation)	23	\$1,392,000
10	HOWARD HANNA FINANCIAL SERVICE	19	\$1,164,000
11	QUICKEN LOANS	18	\$1,160,000
12	COUNTRYWIDE (Including Countrywide Bank FSB & Countrywide Home Loans)	22	\$1,151,000
13	VICTORIAN FINANCE LLC	9	\$747,000
14	NEXTIER BANK NA	2	\$733,000
15	KEYBANK (Keybank National Association & First Niagara Bank NA)	11	\$720,000
16	STANDARD BANK PASB	5	\$662,000
17	CITIZENS BANK (Citizens Bank NA, Citizens Bank of Pennsylvania, and RBS Citizens Bank N.A.)	14	\$650,000
18	FIRST COMMONWEALTH BANK	12	\$636,000
19	RELIANCE FIRST CAPITAL LLC	7	\$623,000
20	JP MORGAN CHASE BANK	10	\$602,000
21	NATIONSTAR MORTGAGE LLC	8	\$548,000
22	ESB BANK	9	\$534,000

Table 10: First National Bank, Key Bank, SSB Bank, and WesBanco Bank Lending to Marshall-Shadeland by Race, 2007-2019

Demographic Category	2007-2011	2012-2016	2017-2019	Total, 2007-2019	% of Total
White Loans (First National Bank)	1	10	6	17	
White Loans (Key Bank) (1)	1	0	2	3	
White Loans (SSB Bank) (2)	1	1	2	4	
White Loans (WesBanco Bank) (3)	12	11	8	31	
Total White Loans	15	22	18	55	62.5%
White Loan \$ (First National Bank)	\$34,000	\$435,000	\$466,000	\$935,000	
White Loan \$ (Key Bank) (1)	\$28,000	\$0	\$220,000	\$248,000	
White Loan \$ (SSB Bank) (2)	\$62,000	\$75,000	\$150,000	\$287,000	
White Loan \$ (WesBanco Bank) (3)	\$511,000	\$435,000	\$400,000	\$1,346,000	
Total White Loan \$	\$635,000	\$945,000	\$1,236,000	\$2,816,000	45.6%
Black Loans (First National Bank)	0	3	2	5	
Black Loans (Key Bank) (1)	2	3	2	7	
Black Loans (SSB Bank) (2)	2	0	0	2	
Black Loans (WesBanco Bank) (3)	2	3	0	5	
Total Black Loans	6	9	4	19	21.6%
Black Loan \$ (First National Bank)	\$0	\$143,000	\$127,000	\$270,000	
Black Loan \$ (Key Bank) (1)	\$98,000	\$171,000	\$161,000	\$430,000	
Black Loan \$ (SSB Bank) (2)	\$44,000	\$0	\$0	\$44,000	
Black Loan \$ (WesBanco Bank) (3)	\$74,000	\$129,000	\$0	\$203,000	
Total Black Loan \$	\$216,000	\$443,000	\$288,000	\$947,000	15.3%

Table 10: First National Bank, Key Bank, SSB Bank, and WesBanco Bank Lending to Marshall-Shadeland by Race, 2007-2019

Demographic Category	2007-2011	2012-2016	2017-2019	Total, 2007-2019	% of Total
Asian Loans (First National Bank)	0	0	0	0	
Asian Loans (Key Bank) (1)	0	0	0	0	
Asian Loans (SSB Bank) (2)	0	0	0	0	
Asian Loans (WesBanco Bank) (3)	0	0	0	0	
Asian Loans	0	0	0	0	0.0%
Asian Loan \$ (First National Bank)	\$0	\$0	\$0	\$0	
Asian Loan \$ (Key Bank) (1)	\$0	\$0	\$0	\$0	
Asian Loan \$ (SSB Bank) (2)	\$0	\$0	\$0	\$0	
Asian Loan \$ (WesBanco Bank) (3)	\$0	\$0	\$0	\$0	
Asian Loan \$	\$0	\$0	\$0	\$0	0.0%
Islander Loans (First National Bank)	0	0	1	1	
Islander Loans (Key Bank) (1)	0	0	0	0	
Islander Loans (SSB Bank) (2)	0	0	0	0	
Islander Loans (WesBanco Bank) (3)	0	0	0	0	
Islander Loans	0	0	1	1	1.1%
Islander Loan \$ (First National Bank)	\$0	\$0	\$5,000	\$5,000	
Islander Loan \$ (Key Bank) (1)	\$0	\$0	\$0	\$0	
Islander Loan \$ (SSB Bank) (2)	\$0	\$0	\$0	\$0	
Islander Loan \$ (WesBanco Bank) (3)	\$0	\$0	\$0	\$0	
Islander Loan \$	\$0	\$0	\$5,000	\$5,000	0.1%

Table 10: First National Bank, Key Bank, SSB Bank, and WesBanco Bank Lending to Marshall-Shadeland by Race, 2007-2019

Demographic Category	2007-2011	2012-2016	2017-2019	Total, 2007-2019	% of Total
AmerIndian Loans (First National Bank)	0	0	0	0	
AmerIndian Loans (Key Bank) (1)	0	0	0	0	
AmerIndian Loans (SSB Bank) (2)	0	0	0	0	
AmerIndian Loans (WesBanco Bank) (3)	0	0	0	0	
AmerIndian Loans	0	0	0	0	0.0%
AmerIndian Loan \$ (First National Bank)	\$0	\$0	\$0	\$0	
AmerIndian Loan \$ (Key Bank) (1)	\$0	\$0	\$0	\$0	
AmerIndian Loan \$ (SSB Bank) (2)	\$0	\$0	\$0	\$0	
AmerIndian Loan \$ (WesBanco Bank) (3)	\$0	\$0	\$0	\$0	
AmerIndian Loan \$	\$0	\$0	\$0	\$0	0.0%
Missing/NA Loans (First National Bank)	1	2	1	4	
Missing/NA Loans (Key Bank) (1)	1	0	0	1	
Missing/NA Loans (SSB Bank) (2)	0	3	3	6	
Missing/NA Loans (WesBanco Bank) (3)	0	1	1	2	
Total Missing/NA Loans	2	6	5	13	14.8%
Missing/NA Loan \$ (First National Bank)	\$30,000	\$202,000	\$68,000	\$300,000	
Missing/NA Loan \$ (Key Bank) (1)	\$42,000	\$0	\$0	\$42,000	
Missing/NA Loan \$ (SSB Bank) (2)	\$0	\$888,000	\$586,000	\$1,474,000	
Missing/NA Loan \$ (WesBanco Bank) (3)	\$0	\$466,000	\$125,000	\$591,000	
Total Missing/NA Loan \$	\$72,000	\$1,556,000	\$779,000	\$2,407,000	39.0%

Table 10: First National Bank, Key Bank, SSB Bank, and WesBanco Bank Lending to Marshall-Shadeland by Race, 2007-2019

Demographic Category	2007-2011	2012-2016	2017-2019	Total, 2007-2019	% of Total
Total Loans (First National Bank)	2	15	10	27	31%
Total Loans (Key Bank) (1)	4	3	4	11	13%
Total Loans (SSB Bank) (2)	3	4	5	12	14%
Total Loans (WesBanco Bank) (3)	14	15	9	38	43%
Total Loan \$ (First National Bank)	\$64,000	\$780,000	\$666,000	\$1,510,000	24%
Total Loan \$ (Key Bank) (1)	\$168,000	\$171,000	\$381,000	\$720,000	12%
Total Loan \$ (SSB Bank) (2)	\$106,000	\$963,000	\$736,000	\$1,805,000	29%
Total Loan \$ (WesBanco Bank) (3)	\$585,000	\$1,030,000	\$525,000	\$2,140,000	35%
Total Loans, All Four Banks	23	37	28	88	100%
Total Loan \$, All Four Banks	\$923,000	\$2,944,000	\$2,308,000	\$6,175,000	100%

Notes:

1. Keybank Merged with First Niagara Bank in 2016. Totals before then include both First Niagara and Key Bank.
2. SSB Bank changed its name from Slovak Savings Bank in 2018. Totals include both Slovak Savings Bank and SSB Bank.
3. WesBanco merged with Fidelity Bancorp in 2012. Totals from 2007 to 2012 include both WesBanco and Fidelity. Totals after 2012 include only WesBanco.
4. Total loans percentages were rounded up to the nearest 100th.

Table 11: SSB Bank Lending in the City of Pittsburgh by Rank by Race, 2007-2019

Demographic Category	2007-2011	2012-2013	2014-2016	2017-2019	2007-2019	% of Total
White Loans	25	32	66	81	204	53.7%
White Loan \$	\$4,110,000	\$4,714,000	\$10,607,000	\$12,028,000	\$31,459,000	52.3%
Black Loans	3	6	5	13	27	7.1%
Black Loan \$	\$166,000	\$496,000	\$368,000	\$2,357,000	\$3,367,000	5.6%
Asian Loans	0	2	2	3	7	1.8%
Asian Loan \$	\$0	\$422,000	\$420,000	\$297,000	\$1,139,000	1.9%
Islander Loans	0	1	0	0	1	0.3%
Islander Loan \$	\$0	\$34,000	\$0	\$0	\$34,000	0.1%
AmerIndian Loans	0	0	0	0	0	0%
AmerIndian Loan \$	\$0	\$0	\$0	\$0	\$0	0%
Missing/NA Loans	2	5	50	84	141	37.1%
Missing/NA Loan \$	\$142,000	\$1,345,000	\$10,757,000	\$11,927,000	\$24,171,000	40.2%
Total Loans	30	46	123	181	380	100%
Total Loan \$	\$4,296,000	\$7,011,000	\$22,152,000	\$26,609,000	\$60,190,000	100%

Note:
 Figures include both Slovak Savings Bank and SSB Bank. SSB Bank changed its name from Slovak Savings Bank in 2018.

Table 12: SSB Bank Lending to Marshall-Shadeland by Race, 2007-2019

Demographic Category	2007-2011	2012-2013	2014-2016	2017-2019	2007-2019	% of Total
White Loans	1	0	1	2	4	33.3%
White Loan \$	\$62,000	\$0	\$75,000	\$150,000	\$287,000	15.9%
Black Loans	2	0	0	0	2	16.7%
Black Loan \$	\$44,000	\$0	\$0	\$0	\$44,000	2.4%
Asian Loans	0	0	0	0	0	0.0%
Asian Loan \$	\$0	\$0	\$0	\$0	\$0	0.0%
Islander Loans	0	0	0	0	0	0.0%
Islander Loan \$	\$0	\$0	\$0	\$0	\$0	0.0%
AmerIndian Loans	0	0	0	0	0	0.0%
AmerIndian Loan \$	\$0	\$0	\$0	\$0	\$0	0.0%
Missing/NA Loans	0	1	2	3	6	50.0%
Missing/NA Loan \$	\$0	\$172,000	\$716,000	\$586,000	\$1,474,000	81.7%
Total Loans	3	1	3	5	12	100%
Total Loan \$	\$106,000	\$172,000	\$791,000	\$736,000	\$1,805,000	100%

Note:

Figures include both Slovak Savings Bank and SSB Bank. SSB Bank changed its name from Slovak Savings Bank in 2018.

Table 13: SSB Bank Top Neighborhoods, 2007-2019 (Ranked by Number of Loans)

SSB Neighborhood Rank	Neighborhood	Total Loan \$	Total Number of Loans
1	Brighton Heights	\$2,420,000	23
2	Shadyside	\$6,279,000	20
3	Central Lawrenceville	\$3,613,000	19
4	Central Northside	\$3,382,000	17
5	South Side Slopes	\$2,383,000	16
5	South Side Flats	\$2,475,000	16
7	Mount Washington	\$1,126,000	13
7	East Allegheny	\$2,643,000	13
7	Brookline	\$868,000	13
10	Marshall-Shadeland	\$1,805,000	12
11	Perry North	\$1,380,000	11
12	Hazelwood	\$938,000	10
12	Carrick	\$1,327,000	10
12	Manchester	\$1,907,000	10
12	Highland Park	\$1,711,000	10

Table 14: SSB Bank Top Neighborhoods, 2007-2019 (Ranked by Loan Dollars)

SSB Neighborhood Rank	Neighborhood	Total Loan \$	Total Number of Loans
1	Shadyside	\$6,279,000	20
2	Central Lawrenceville	\$3,613,000	19
3	Central Northside	\$3,382,000	17
4	East Allegheny	\$2,643,000	13
5	South Side Flats	\$2,475,000	16
6	Brighton Heights	\$2,420,000	23
7	South Side Slopes	\$2,383,000	16
8	Manchester	\$1,907,000	10
9	Marshall-Shadeland	\$1,805,000	12
10	Highland Park	\$1,711,000	10
11	Perry North	\$1,380,000	11
12	Carrick	\$1,327,000	10
13	Mount Washington	\$1,126,000	13
14	Hazelwood	\$938,000	10
15	Brookline	\$868,000	13

Table 15: Neighborhoods Where SSB Has Approved Loans to African Americans, 2007-2019 (Ranked by Loan Dollars)

No.	Neighborhood (Majority African American are shaded)	Number of Loans	Loan Dollars
1	Crawford-Roberts	1	\$1,005,000
2	Upper Hill	6	\$567,000
3	Central Northside	2	\$540,000
4	Highland Park	2	\$215,000
5	Squirrel Hill North	1	\$182,000
6	Beechview	1	\$155,000
7	Bloomfield	1	\$125,000
8	Westwood	1	\$122,000
9	Perry South	3	\$121,000
10	Lincoln Place	2	\$97,000
11	Homewood North	2	\$70,000
12	Mount Oliver	1	\$65,000
13	Marshall-Shadeland	2	\$44,000
14	Sheraden	1	\$40,000
15	California-Kirkbride	1	\$39,000
Totals		27	\$3,387,000

Assessing Community Needs in Marshall-Shadeland

TO MANAGE A PREDEVELOPMENT STUDY of Marshall-Shadeland, the Lower Marshall-Shadeland Development Initiative employed the “cluster approach” to the neighborhood. Pioneered by Operation Better Block in Pittsburgh’s Homewood neighborhood, cluster planning is a community-driven land use process.²² Marshall-Shadeland was divided into eight distinct geographic clusters. Each parcel was evaluated to determine ownership and purchase dates to get a sense of the rate of property turnover.²³ Most of the analysis focused on Clusters 1 and 1A, which surround Marshall Avenue, the main gateway to the neighborhood and where SSB Bank maintains its branch. These two clusters have a total of 375 houses. Of these, 148 properties (39.5%) have been purchased since 2010, highlighting the rapid turnover of real estate in this area. In addition, 181 of the 375 properties (48.3%) are owned by people who do not live there.

One indicator that community needs are not being met is gentrification. It is just a matter of time before the next affordable neighborhood, like Marshall-Shadeland, turns into a gold mine for deep-pocketed investors, displacing those who have lived there for decades (sometimes generations), and who are often people of color. As Peter Moskowitz elaborates, gentrification is a systemic problem. “Gentrification is not about individual acts,” he writes, “it’s about systemic violence based on decades of racist housing policy in the United States that has denied people of color, especially black people, access to the same kinds of housing,

and therefore the same levels of wealth, as white Americans.”²⁴ But gentrification is a market problem made worse by the proliferation of vacant properties and lenders who refuse to extend credit to residents.

Vacant and underutilized land and buildings have vexed cities for decades, but must be seen as assets which can be acquired and recycled into productive use. The Brookings report by Paul Brophy and Jennifer Vey, “Seizing City Assets: Ten Steps to Urban Land Reform” (2002), influenced LMSDI’s approach, which began our approach to land recycling in Marshall-Shadeland with step one: “know your territory.”²⁵ Our community reinvestment team identified vacant properties in the neighborhood and documented the condition of every vacant structure.

Over the course of three weeks in May and June of 2020, our community reinvestment team recorded 434 vacant properties in eight clusters throughout Marshall-Shadeland. The highest number of vacancies are in Clusters 1 & 1A (120 vacant properties), the area which surrounds SSB Bank. In short, there are more than 430 vacant homes in Marshall-Shadeland, many are not owned by the people who live there, and many are encumbered by back taxes and unpaid utility bills. LMSDI has a strategy, just like many community-based organizations. But structural disparities threaten our work. Why develop a development program if minority residents in the neighborhood cannot obtain loans? How can a bank which has been in a neighborhood for a century coexist with more than 430 vacant properties right in their backyard, where they were founded?

²² “Homewood Comprehensive Community Plan,” Homewood Community Collaborative, April 22, 2019, accessed on July 11, 2020, https://apps.pittsburghpa.gov/redtail/images/5644_V2_Spread_Homewood_CC_Plan_Final_Draft.pdf and “Cluster Planning,” Operation Better Block, accessed on July 11, 2020, <https://www.obbinc.org/prgrams/cluster-planning/>.

²³ For more on NOAH, see Ira Goldstein, Emily Dowdall, Jacob Rosch and Kevin Reeves, “Maybe it Really Does Take a Village: Supporting the Creation of High-Quality Unsubsidized Affordable Rental Housing in Legacy Cities—Working Paper” (Philadelphia: The Reinvestment Fund, 2019).

²⁴ Peter Moskowitz, *How to Kill A City: Gentrification, Inequality, and the Fight for the Neighborhood* (New York: Nation Books, 2017), 5.

²⁵ Paul C. Brophy and Jennifer S. Vey, “Seizing City Assets: Ten Steps to Urban Land Reform” (Washington, DC: Brookings Institution, October, 2002).

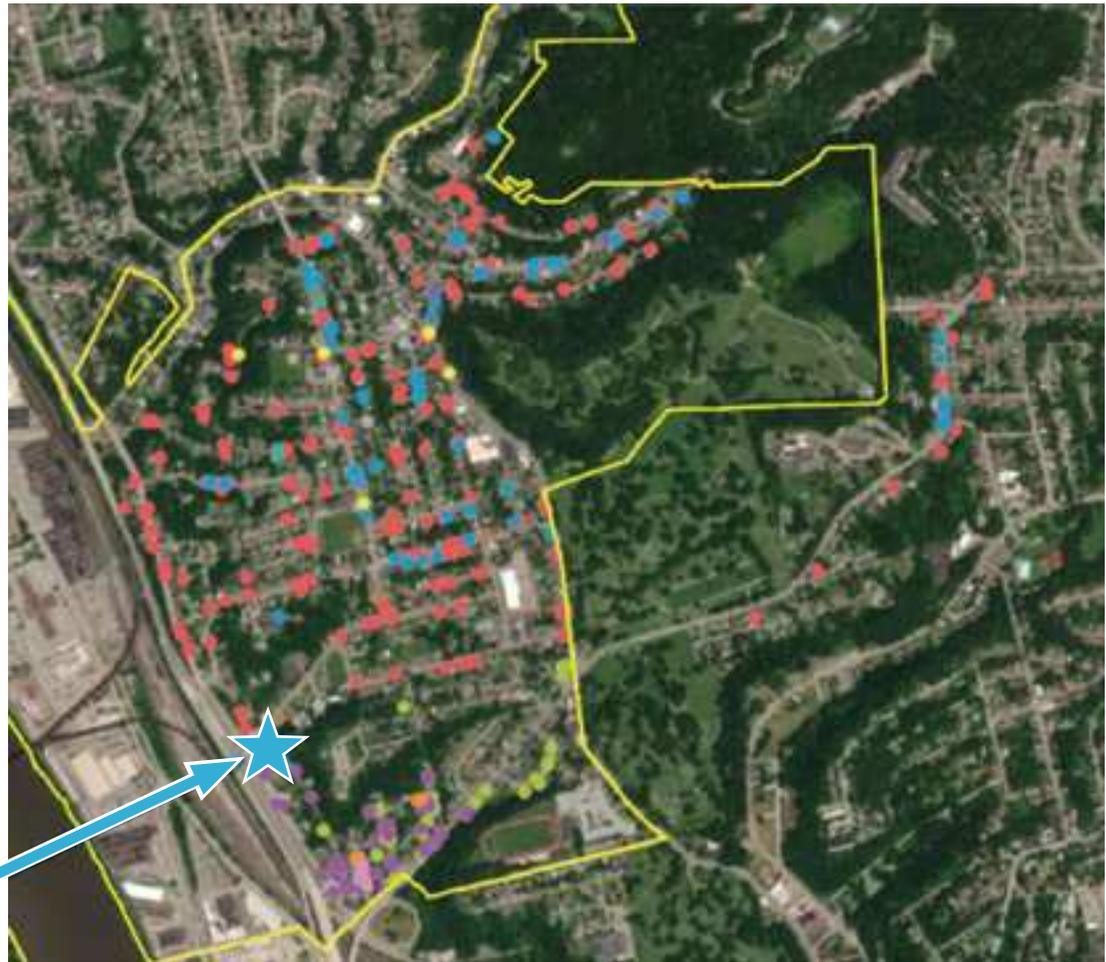
Table 16: Marshall-Shadeland Vacant Property Inventory, as of November 29, 2020

	Cluster 1 & 1A	Cluster 2	Cluster 3	Cluster 4	Cluster 5	Cluster 6	Cluster 7	Cluster 8	Total
Vacant Houses/ Businesses	47	46	70	23	20	20	42	14	282
Potentially Vacant Structures	8	2	5	2	0	0	1	1	19
Vacant Lots	65	7	32	1	5	0	19	4	133
Total Vacant Properties (lots and structures)	120	55	107	26	25	20	62	19	434



Lower Marshall-Shadeland Community Engagement Team

Map of Vacant Properties in Marshall-Shadeland



SSB Bank Branch

0.2 mi
USDA FSA, Maxar

Neighborhood Aerial Map

- Vacant House
- Vacant Land
- Renovation
- Greenspace
- New Construction
- Vacant Business
- Side Yard Garden
- Vacant Business/Other
- Vacant House for Sale
- Vacant House Condemned
- Other



SSB Bank Located in Lower Marshall-Shadeland

CRA Recommendations

THE CHIEF WEAKNESSES of “the reinvestment thesis” are that relationships and partnerships obscure lending disparities and that the regulatory environment enables banks such as SSB Bank to continue to redline neighborhoods and still receive a passing CRA grade. To address this, LMSDI has several recommendations to “modernize” CRA. Many of these suggestions are not really “modernization”; they recommend returning to CRA’s original roots, which is the reinvestment in neighborhoods, not just lending to minorities.

First, financial institutions not covered by CRA, such as internet banks, finance companies, and independent mortgage companies, must be subject to CRA evaluation. Currently, CRA only covers certain banks (in the case of the Fed, state-chartered banks). But often, these non-bank institutions do not have a physical branch location (such as Quicken Loans) and are among the top lenders in LMI and minority communities. The regulations, as written, provide no federal oversight of these institutions’ lending records in LMI and minority communities. These institutions must be held to the same standards as traditional banks.

Second, although many bank branches are becoming obsolete, those banks with branch locations in or adjacent to a LMI or minority community must be evaluated with stricter guidelines. For instance, to what extent has the institution extended credit to borrowers within or near the branch’s immediate neighborhood? A greater onus must be placed upon banks with physical locations in these communities in order to stress their commitment to those areas. As part of the evaluation, the banks’ ability to address local conditions such as vacant properties or gentrification must be considered. Incentives for innovative products and programs, as well as results,

like number of loans to minorities who live near the bank’s branch, should be rewarded.

Likewise, banks which fail to meet the needs of communities in which they have a branch location should not be rewarded. In the case of SSB Bank, its Marshall-Shadeland branch is situated in a sea of more than 430 vacant properties. We understand that banks exist in a competitive marketplace. SSB is far from the top lender in Marshall-Shadeland (it is tied for 13th lender in the community, by number of loans). But the fact that SSB Bank was the top lender in Allegheny West (a higher-income, white neighborhood about two miles from Marshall-Shadeland) between 2017 and 2019 suggests that the bank has turned its back on the neighborhood where it started a century ago but maintains a branch location. This lending record must be considered as part of the CRA evaluation, regardless of bank asset size.

As a result, our third recommendation is for improvements to data collection and analysis. Banks should be evaluated not only for simply making minority loans, but minority loans within minority communities and the extent to which the bank has contributed to low-income communities’ improvement. For instance, the fact that SSB Bank has only approved two loans to African Americans for \$44,000 in Marshall-Shadeland in thirteen years is abhorrent, yet the bank was given a “Satisfactory” CRA rating. A bank could be rewarded for making loans to African Americans in the suburbs, far away from distressed neighborhoods. In the case of SSB Bank, it approved a loan to a high-income African American in Cranberry Township, a suburb north of Pittsburgh in Butler County. This type of lending has nothing to do with community reinvestment in communities that need it most.

In addition, the data we analyzed includes a high proportion of loans in the “Missing/NA” category—as many as 14.6% of the loan volume and 28.2% of the loan dollar volume of lending among all banks in the city of Pittsburgh over the thirteen-year period. It is not clear what this category contains—more loans to whites or African Americans? But it is a growing proportion of a bank’s portfolio that skews their lending record. Banks must be held accountable for this category.

Fourth, are community development financial institutions (CDFIs) a “safety valve” for stronger CRA lending by traditional banks? CDFIs help fill gaps in lending, but they generally charge higher interest rates. In short, traditional banks should be doing more community-based lending. If banks are truly meeting community needs, should not their lending reflect this? Banks could create a pool of funding to lower the pricing of loans and thus, spread the risk around.

Fifth, CRA must be localized. Pittsburgh, like many cities, has a depository relationship with financial institutions such that banks are evaluated by the city based on their CRA records. According to this policy, the city government should not deposit its funds into those banks with failing CRA records. But these relationships must be made more transparent, so the public can evaluate and comment on banks’ lending records as part of the city’s depository re-

lationship. Currently, citizens do not know in which banks the city deposits its funds, or the respective CRA records of these banks. An easily accessible annual report should be made available to the public and be considered part of the CRA evaluation.

Finally, it is critical that the banks’ executive leadership tours the neighborhood where they derive their deposits; to walk around, knock on doors, and meet with community people. In the early days of PCRG, we secured buses and provided detailed tours of Pittsburgh’s low- and moderate-income and minority neighborhoods. Such an on-foot analysis is critical to understand the larger scope of the problems and opportunities in low- and moderate-income and minority neighborhoods. Therefore, we recommend that the president & CEO, CRA officer, and board members spend two days a year touring their reinvestment areas to see firsthand what is happening in the neighborhoods as a critical component of “meeting community needs.”

We hope these comments initiate a productive dialogue that gets us closer to the reinvestment activity that we started twenty-five years ago. There are many opportunities for banks to do well by doing good. But in order for this to happen, the proper regulatory environment must exist to hold banks accountable to the communities they are chartered to serve.

About the Project Research and Advisory Team

Stanley A. Lowe

LMSDI Chief Development Officer

With over thirty years of experience, Stanley Lowe has provided technical assistance to public housing authorities, historic preservation organizations, government agencies, universities, and community-based organizations. He has proven expertise in community revitalization and economic development, real estate development, asset management, community planning, organizational restructuring, budget and financial management, and public housing management.

Over the years, Mr. Lowe has held a number of positions including posts as Board Member and Vice President of the National Trust for Historic Preservation, President of the National Trust Community Development Financial Institution (CDFI), a Board Member of the National Trust Community Investment Corporation, where he played an instrumental role in the National Trust's successful efforts to combine New Markets Tax Credits with Historic Tax Credits for community revitalization.

Mr. Lowe worked as assistant to former Mayor Tom Murphy as Director for Neighborhood Housing Policy and Planning, Pittsburgh, PA. He was Vice President of Pittsburgh History and Landmarks Foundation and a Board Member of the Pennsylvania Bureau of Historic Preservation. He is the founder of the Pittsburgh Community Reinvestment Group, charter member of the Pittsburgh African American Chamber of Commerce and a former Board Member of Citizens Bank of Pennsylvania and Chairman of its CRA Committee.

Daniel Holland, PhD

*LMSDI Lead Research Analyst and
Community Reinvestment Team Leader*

As a Pittsburgh native, Dan received a BA in Applied History (now Policy & History) at Carnegie Mellon University in 1991, his Masters in Public Management from the Heinz College in 2002, and his MA in History at the University of Pittsburgh in 2015. In 2019, Dan successfully defended his History PhD, entitled "Communities of Resistance: How ordinary people developed creative responses to marginalization in Lyon and Pittsburgh, 1980-2010," at the University of Pittsburgh.

He is an adjunct history professor at Duquesne University and the University of Pittsburgh. Over the course of his career, Dan Holland assumed leadership roles at a number of nonprofit organizations at the local, regional, and national level, including Pittsburgh History & Landmarks Foundation, Pittsburgh Community Reinvestment Group, National Community Reinvestment Coalition (Washington, DC), Federal Reserve Bank (Pittsburgh Branch), and the Opportunity Finance Network (Philadelphia) on projects related to historic preservation, economic justice, and fair housing and fair lending. For ten years, 2002 to 2012, Daniel served as the founder and CEO of the Young Preservationists Association of Pittsburgh.

Daniel has been published in several local and national newspapers, magazines, and journals including, "Forging A Consistent Vision: The People That Shaped Manchester's Renewal, 1964- 2014," Pennsylvania History Journal, Spring 2019. Daniel is the author of the forthcoming chapter on "Narratives of Resistance in Lyon and Pittsburgh" in *Urban Narratives and the Redevelopment of Cities* (working title), Lyon, France: Edward Elgar Publishing, 2021.

Randy Weinberg, PhD

LMSDI Senior Data Collection Analyst

Randy Weinberg currently serves as Technical Facility Emeritus, Information Systems, at Carnegie Mellon University. He has also served as a faculty member in the Dietrich College of Humanities and Social Sciences Information Systems program since 1998. He was the faculty director of the program from 2001 through 2018. His main professional interests are in information systems education and applying information technology in service to the larger community.

He helped solidify service learning as a cornerstone of the undergraduate Information Systems (IS) curriculum. Over his 20 years at CMU, approximately 1,600 students have participated in IS community-based service learning courses in both Pittsburgh and Qatar, IS global summer service experiences and a long-running summer institute for underserved student populations.

Prior to his service at Carnegie Mellon, he was a professor of computer information systems at St. Cloud State University, St. Cloud, Minnesota.

He began his professional career in the early 1970s, during (as he calls it), 'The Jurassic era' of computing, working as a programmer at IBM on the System/370 operating system. He earned his Bachelors of Science degree in Math and his Ph.D. degrees from the University of Minnesota.

In his 32 years as an educator, he has been privileged to work with an amazing galaxy of students, faculty colleagues, staff members, and community project partners.

Joe W. Trotter, Jr., PhD

LMSDI Project Advisor

Joe W. Trotter, Jr. Giant Eagle Professor of History and Social Justice and past History Department Chair at Carnegie Mellon University in Pittsburgh, Pennsylvania. He is also the Director and Founder of Carnegie Mellon's Center for African American Urban Studies

and the Economy (CAUSE). Professor Trotter received his BA degree from Carthage College in Kenosha, Wisconsin and his M.A. and Ph.D. degrees from the University of Minnesota. He is currently working on a study of African American urban life since the Atlantic slave trade.

Dr. Trotter teaches graduate and undergraduate courses in African American and U. S. urban, labor, and working class history. He has delivered scholarly papers and lectures in a variety of professional forums in the United States and abroad, including institutions of higher education in the United Kingdom, France, Germany, Russia, the Netherlands, and the Middle East. He has served on the boards and committees of numerous professional organizations: Executive Council, OAH; Chair, Nominating Committee, OAH; OAH Program Committee; Executive Council, SHA; Program Committee, SHA; Francis B. Simkins Prize Committee, SHA; Immigration History Society Executive Board; Jameson Fellowship Committee, AHA; Program Committee, Oral History Association; chair of the annual Program Committee of the American Historical Association. He is also a member and Vice President of the Board of Trustees of the H. John Heinz III Regional History Center, a Smithsonian Affiliate, and past President of the Labor and Working Class History Association.

LeTaj Tinker, RA, NCARB, NOMA

LMSDI Project Architect

Proudly hailing from the sunny isles of the Bahamas, LeTaj has a unique design background with over 8 years with field and office experience which includes architecture, urban design, historic preservation, and community development.

LeTaj has accumulated experience through his work on affordable-housing developments, sustainable developments, and residential and light commercial construction in both the nonprofit and for-profit

sectors. This has allowed him to develop an acute understanding of, as well as the ability to operate within and between community organizations, for-profit entities, and government entities.

After graduating from FAMU (Florida Agricultural and Mechanical University) with his Masters in Architecture with a focus on Historic Preservation, LeTaj was selected as a fellow of the UDREAM program - an urban design fellowship through Carnegie Mellon University, while concurrently pursuing and completing his M.Sc. in Facilities Management.

Presently working in the Homewood neighborhood of Pittsburgh, LeTaj is focused on the revitalization of disenfranchised minority neighborhoods; as well as increasing the number of minority professionals in the field of architecture and its allied fields.

He is the owner and principal of TINK+Design, LLC, and is also a member of the National Organization of Minority Architects (NOMA) and the International Facilities Management Association (IFMA).

Jerome M. Jackson

LMSDI Team Leader, Community Engagement

Jerome Jackson is the President and CEO of Pittsburgh Planning and Design for Community Services, Executive Director of Operation Better Block (OBB), and the Owner and President of J. Jackson Consulting & Training Institute. Using decades of experience in community consensus building, grass roots outreach and community economic development, Jerome leads OBB in its mission to prevent the spread of blight and neighborhood deterioration and to further a sense of responsibility and civic pride. OBB carries out its mission by mobilizing residents, elected officials and through partnership with community agencies that focus on education, community safety, green initiatives and youth development.

Jerome also has extensive experience and expertise in the areas of program management, mediation, training, community organizing and youth develop-

ment for clients such as City Of Pittsburgh, Mayor's Youth Policy Office, the Pittsburgh Mediation Center (PMC), Cornell Abraxas Pittsburgh School, Circle C Youth and Family Services, Department of Public Welfare, National Center for Juvenile Justice, Health Education Center, Police Departments, Youth Serving Agencies, School Districts, Universities, and other nonprofit agencies. In his mediation practice, Jerome has worked intensively with youth, their families and community members to help them find constructive ways to resolve conflicts. Jerome is particularly skilled in conflict resolution, mediation skills, victim and offender mediation, gang prevention, intervention, and gang awareness.

He has designed and conducted trainings for various community organizations, groups, and agencies both locally and nationally. Jerome is also a sought-after speaker and facilitator. He has presented workshops and been on panels at the following conferences: Conflict Resolution Education Network (CREnet), The Network of Communities for Peacemaking and Conflict Resolution (NCPCR), Allegheny Intermediate Unit Safe Schools Conference, Preventing Crime in the Black Community, Minorities in Alternative Dispute Resolution, and the National Network of Black Social Workers, and Alternative Conflict Resolution (ACR).

Jerome is a Mediator for U.S. Equal Employment Opportunity Commission, U.S. Federal Court Western PA District, UPMC Intermediation Program, and a former Arbitrator of the Dispute Settlement Board for Ford Motor Company.



**Parents Against
Violence**

CHANGING LIVES AND
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Development Initiative

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