

**City of Los Angeles
Responsible Banking & Investment Monitoring Program
For Investment Banks**

Investment banks providing City investment banking services or seeking City investment banking business must complete and submit this form no later than July 1st of each year to the City Administrative Officer to comply with Chapter 5.1, Section 20.95.1 of the Los Angeles Administrative Code.

Contact Information:

Name of Financial Institution

Street Address	City	State	Zip Code
----------------	------	-------	----------

Contact Person Name and Title

Telephone No.	Email Address
---------------	---------------

SOCIAL RESPONSIBILITY

Please answer the following questions for the preceding calendar year.

1. Did your firm make monetary donations to charitable programs within the City limits?

Yes ___ No ___

If yes, please complete the attached form, labeled at Exhibit 1.

2. Did your firm provide any scholarship awards to residents of the City of Los Angeles?

Yes ___ No ___

- a. How many scholarships were awarded? _____
b. What was the total value of the awarded scholarships? _____

3. Does your firm have internal policies regarding utilization of subcontractors which are designated as "women owned," "minority owned," or "disabled" business enterprises? Yes ___ No ___

If yes, please provide a copy of your policies, labeled as Exhibit 2

CONSUMER PROTECTION

1. Is the financial institution currently in compliance with all applicable consumer financial protection laws?

Yes ___ No ___

If no, please briefly explain: _____

2. Does the financial institution have policies to prevent the use of illegal predatory consumer adverse sales goals as the bases for evaluation, promotion, discipline or compensation of employees?

Yes ___ No ___

If no, please briefly explain: _____

3. Does the financial institution encourage and maintain whistleblower protection policies for its employees and/or customers to report suspected illegal practices, including predatory sales goals?

Yes ___ No ___

If no, please briefly explain: _____

4. In the last five years, has the financial institution been subject to any disciplinary actions such as fines, suspensions, or settlements, undertaken by the Securities and Exchange Commission, the Consumer Financial Protection Bureau, the Municipal Securities Regulation Board, the Financial Industry Regulatory Agency and/or any State regulatory agency?

Yes ___ No ___

5. If the answer to question no. 4 is yes, please provide in separate attachment labeled Exhibit 3, what the violation(s) are, the reason for the enforcement action, what government agencies are involved, the date of the enforcement action, what is the current status, and how were or will the issues be resolved?

CERTIFICATION UNDER PENALTY OF PERJURY (*)

I certify under penalty of perjury that I have read and understand the questions contained in this form and the responses contained in the form and on all the attachments. I further certify that I have provided full and complete answers to each question, and that all information provided in response to this form is true and accurate to the best of my knowledge and belief.

Print Name Title Signature Date

(*) Signature must be that of the Head of Public Finance or equivalent corporate executive.

PLEASE SEND THE ORIGINAL SIGNED FORM TO THE ADDRESS BELOW AND EMAIL A COPY TO CAO.DEBT@LACITY.ORG.

**Office of the City Administrative Officer
200 North Main St. Room 1500
Los Angeles, CA 90012
Attention: Debt Management Group**

Attachment for Question #1 - Responsible Banking Investment Monitoring Program for Investment Banks

Name of Charitable Organization	Type	Amount (\$)

EXHIBIT 1

**Attachment for Question #1 of "Social Responsibility"
Responsible Banking Investment Monitoring Program for Investment Banks**

Name of Charitable Organization	Type	Amount (\$)
Centro de Rehabilitacion Ebenezer	General Contribution	5,000.00
Association of Retirement Organizations in Higher Education	Virtual Conference 2021	2,500.00
LA's Best	Essential Connections 2021	10,000.00
5050 Women on Boards (Formerly 20/20 WOB)	50/50 Women on Boards Sponsorship	10,000.00
Race to Erase MS	Race to Erase MS	5,000.00

EXHIBIT 2

Attachment for Question #3 of “Social Responsibility”

RAYMOND JAMES®

June 23, 2022

Roy Yoon
Finance & Risk Control Division
Los Angeles Department of Water & Power
111 N. Hope Street, Room 465
Los Angeles, CA 90012

Dear Mr. Roy Yoon:

To comply with Chapter 5.1, Section 20.95.1 of the Los Angeles Administrative Code, this letter is being provided to the Los Angeles Department of Water & Power as requested by the Responsible Banking Ordinance – Corporate Citizenship Statement Form.

Raymond James is dedicated to an inclusive and diverse environment where differences are understood, respected, and valued. As the Senior Vice President of Procurement for Raymond James, I have the responsibility to ensure that the Firm's values regarding diversity are extended to our suppliers as well.

Raymond James Procurement is leading the Supplier Diversity policy and program and has an established program and a website dedicated to Supplier Diversity. Raymond James has developed an approach to ensure that supplier diversity is considered as part of the supplier selection process, and our Procurement policies and procedures have been updated to incorporate supplier diversity accordingly. In October 2016, Raymond James engaged a third party to assist with the diversity designation and classification of our supply base, enabling Procurement to report diverse supplier spend and percentage.

Our vision is to employ Supplier Diversity in our purchasing and sourcing initiatives within the firm to enhance the growth and development of Minority and Woman-Owned Business Enterprises. We look forward to updating you with our progress toward our supplier diversity program in future years.

Sincerely,

DocuSigned by:



23B04C8131D240A...

Lawrence Martiny

Senior Vice President, Procurement
Raymond James & Associates, Inc.

EXHIBIT 3

Attachment for Question #5 of “Consumer Protection”

Disclosures

In the normal course of business, Raymond James & Associates, Inc. (“Raymond James”) is subject to routine regulatory investigations. Raymond James cooperates fully with all regulatory requests. To the best of our knowledge there are no regulatory or litigation matters pending which would impair Raymond James’s ability to perform the requested services. This response is limited to matters resolved within the last five years relating to Raymond James.

Although unrelated to Raymond James’s public finance activities, on November 6, 2019, Raymond James and its affiliate, Raymond James Financial Services, Inc. (“RJFS”) entered into a joint Letter of Acceptance, Waiver and Consent (“AWC”) with the Financial Industry Regulatory Authority (“FINRA”) concerning certain sales practices regarding 529 savings plans. Specifically, the AWC found that, from 2008 through March 31, 2017, Raymond James and RJFS each failed to establish and maintain a supervisory system, and failed to establish, maintain and enforce written supervisory procedures, reasonably designed to supervise representatives’ share-class recommendations in violation of MSRB Rule G-27(a), (b) and (c). The AWC was entered by consent without admission or denial of the findings.

Although unrelated to Raymond James’s public finance activities, on September 17, 2019, Raymond James, RJFS, and Raymond James Financial Services Advisors, Inc. (“RJFSA”) entered into a joint settlement with the Securities and Exchange Commission (“SEC”) regarding inactive retail accounts and certain sales practices regarding unit investment trusts (“UITs”). Specifically, the Order found that, from 2013 to 2017, Raymond James and RJFSA failed to adequately and timely conduct a suitability review for inactive accounts and failed to adopt and implement reasonably designed policies and procedures concerning inactive advisory account monitoring. The SEC also found that Raymond James and RJFS recommended short-hold transactions in UITs without a reasonable basis to believe that such transactions were suitable; failed to disclose the impact of certain conflicts relating to rollovers of UITs; and used incorrect UIT valuations to calculate management fees for certain advisory accounts. The Order was entered by consent without admission or denial of the findings.

Although unrelated to Raymond James’s public finance activities, on April 13, 2017, Raymond James’s parent company, Raymond James Financial Inc., reached an agreement for \$150,000,000 to settle all investor claims against the firm related to an alleged fraudulent EB-5 investment program created in 2007 by third parties and offered directly to foreign investors. EB-5 is a U.S. government visa program through which foreign investors and their immediate families can obtain permanent residency green cards by making a capital investment in a U.S. business. Raymond James did not act as placement agent or in any other capacity for the program and none of the investors in the program purchased their investments through Raymond James. The Raymond James financial advisor for the brokerage accounts of the related investment partnerships is no longer employed by the firm. The plaintiffs in the lawsuits generally allege some combination of the following: that Raymond James was negligent in supervision, breached fiduciary duty, conspired to breach, and aided and abetted the breach of, fiduciary duty, committed, or aided and abetted, fraud and/or fraudulent inducement, engaged in or facilitated fraudulent transfers, committed conversion, civil theft, and/or commingled investor funds.

Although unrelated to Raymond James’s public finance activities, in May, 2016, Raymond James executed an AWC with FINRA and was fined \$8,000,000 together with a \$9,000,000 fine against RJFS, related to system and procedure deficiencies of the firm’s AML program from 2011 to 2014, which have been significantly enhanced since that time. Enhancements include hiring a new chief AML officer with extensive experience; increasing the number of AML-dedicated staff; increasing training for all associates; and improving processes and oversight.

Raymond James engages in a full range of securities-related business. As a result of its size and in line with other full-service firms in its industry, Raymond James and certain associates have been involved in a modest number of lawsuits, regulatory actions, and investigation during the last five years, in addition to the aforementioned matters. Some of these matters have touched upon Raymond James’s activities as they relate to municipal securities.

Please refer from time to time to Raymond James’ various regulatory filings available on the SEC’s and FINRA’s websites for additional information.