

**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:

J.P. Morgan Securities LLC

Name of Financial Institution

560 Mission Street, Floor 3 San Francisco CA 94105

Street Address

City

State

Zip Code

Will Frymann, Executive Director

Contact Person Name and Title

415-315-3901

will.frymann@jpmorgan.com

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 X

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 X

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 X 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?

See Exhibit 3

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.

Will Frymann **Executive Director**

6/20/2024

Print Name

Title

Signature

Date

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

PLEASE EMAIL THE COMPLETED FORM TO CAO.DEBT@LACITY.ORG.

EXHIBIT 1
**J.P. Morgan Monetary Donations to Charitable
Programs within the City of Los Angeles**

**The Public Finance group of J.P. Morgan Securities LLC has not made any charitable contributions; however, the JPMorgan Chase Foundation and the JPMorgan Chase Bank, N.A. have made the following charitable contributions:*

Charitable Organization	Amount (\$)
A New Way of Life Reentry Project	\$ 125,000.00
Abode Communities	\$ 150,000.00
Accessity	\$ 17,732.29
AmPac Tri-State CDC, Inc.	\$ 25,000.00
CALIFORNIA COMMUNITY BUILDERS, INC.	\$ 25,000.00
California Housing Partnership Corporation	\$ 5,173.00
Capital Impact Partners	\$ 120,000.00
Center for Employment Opportunities	\$ 125,000.00
Coalition for Responsible Community Development	\$ 187,500.00
Community Coalition for Substance Abuse Prevention & Treatment	\$ 150,000.00
Community Partners	\$ 150,000.00
CORO SOUTHERN CALIFORNIA, INC.	\$ 100,000.00
Downtown Works	\$ 100,000.00
Enterprise Community Partners, Inc.	\$ 232,758.63
Genesis LA Economic Growth Corporation	\$ 1,150,000.00
GRID Alternatives Greater Los Angeles, Inc.	\$ 158,667.00
Housing California	\$ 6,037.50
Latino Community Foundation	\$ 25,000.00
LOS ANGELES BROTHERHOOD CRUSADE - BLACK UNITED FUND, INC.	\$ 150,000.00
Los Angeles Urban League	\$ 125,000.00
LTSC Community Development Corporation	\$ 150,000.00
Neighborhood Housing Services of Los Angeles County	\$ 235,000.00
Neighborhood Partnership Housing Services, Inc.	\$ 94,500.00
New Economics for Women	\$ 150,000.00
Outward Bound Inc.	\$ 166,857.14
PER SCHOLAS, INC.	\$ 125,000.00
Regents University of California Los Angeles	\$ 125,000.00
Rockefeller Philanthropy Advisors, Inc.	\$ 260,250.00
Social Justice Learning Institute Inc.	\$ 827,583.00
UNITE-LA, INC	\$ 250,000.00
University of Southern California	\$ 150,000.00
Vibrant Emotional Health	\$ 122,000.00
Total	\$ 5,784,058.56

EXHIBIT 2
J.P. Morgan Global Supplier Diversity

Please use link to find J.P. Morgan's website on Global supplier diversity and additional presentation on global supplier diversity material on the next page

<https://www.jpmorganchase.com/about/suppliers>

Global Supplier Diversity

Program Overview | April 2025

Dedicated to Expanding Opportunities

For more than three decades JPMorganChase has been building a strong and inclusive supply chain.

We seek to provide equal access to opportunities in the various areas in which we operate, including in our sourcing engagements. Our approach to working with suppliers includes taking a broad lens and looking at the goods and services available in the marketplace and in the communities in which we do business.

Our Supplier Diversity Program is focused on:

- facilitating the growth and development of businesses in our supply chain network
- promoting opportunity across our entire portfolio of supply chain business partners
- driving economic growth in the communities in which we do business

The firm spends over \$2 billion with small and diverse businesses annually, and its strategy focuses on more than our spend with these businesses. JPMorganChase is leveraging the strength of its total procurement organization, business and community partners to lower common barriers faced by small and diverse suppliers .

Strategy

The JPMorganChase Global Supplier Diversity team, in partnership with the procurement organization employs a multi-prong strategy that includes the following:

Business Development

Our dedicated business development professionals ensure that small and diverse suppliers can successfully navigate our processes, fulfill their contracts, and grow their business with JPMorgan Chase.

Building strong Relationships

We foster the growth of locally-owned small and diverse companies across key U.S. cities through deepened relationships and by connecting business owners with a full ecosystem of JPMorgan Chase resources and partners.

Lowering Barriers to Opportunity

Developing innovative programs to lower common barriers to corporate contract opportunities such as cyber-readiness and the cost of meeting minimum corporate requirements.

Community Engagement

Our Global Supplier Diversity team supports builds relationships with certifying organizations, such as the Women's Business Enterprise National Council, the National Minority Supplier Development Council and others. These organizations provide a platform for the firm to connect with business owners, provide information about our practices and share our expertise. In addition, we partner with business schools and other organizations to provide tactical and executive level education to small and diverse business owners.

Supplier Diversity and Strategic Sourcing

To ensure that we have access to a pipeline of eligible small and diverse businesses to consider for sourcing opportunities, we have an established process for identifying potential suppliers.

We invite small and diverse businesses that **have obtained certain** ownership certifications to submit their information to us via the JPMorganChase Supplier Network portal at www.jpmmorganchase.com/SupplierDiversity.

The Supplier Network is the resource through which our supplier services teams identify eligible businesses for consideration in contracting opportunities.

Our sourcing organization strives to achieve the optimal combination of service, quality and price for the products and services purchased on behalf of the firm. Our Global Supplier Diversity team works in concert with sourcing managers and our business units to ensure that a broad selection of suppliers is available to meet the firm's business needs.

MANAGEMENT TRACKING AND REPORTING

JPMorgan Chase has robust management, tracking and reporting systems to support our Global Supplier Diversity Program. The firm tracks spend by various classifications including small businesses and businesses owned by **groups including, without limitation**, women, ethnic minorities, veterans, people with disabilities, and members of the LGBTQ+ community.

TIER 2 PROGRAM

In addition to purchasing directly from small and diverse suppliers, JPMorgan Chase also encourages its prime suppliers to include small and diverse businesses in their supply chains. We track this Tier-2 spend by **inviting our** suppliers to report their small and diverse supplier spend to us on a quarterly basis.

Finding suppliers

CERTIFICATION REQUIREMENTS

JPMorganChase defines a “Small and Diverse Supplier” as one certified by a designated third-party as having revenue or number of employees that do not meet a certain threshold according to the industry and/or being 51% owned, operated and controlled by members of historically underrepresented groups, including:

- Minority-Owned Business Enterprise (MBE)
- Women-Owned Business Enterprise (WBE)
- Veteran-Owned Business Enterprise (VBE)
- Service-Disabled Veteran-Owned Business Enterprise (SDVBE)
- LGBT-Owned Business Enterprise (LGBTE)
- Disability-Owned Business Enterprise (DOBE)
- Small Business Enterprise (SBE)

EXTERNAL PARTNER ORGANIZATIONS

We partner with several organizations and their local affiliates for support to execute on our supplier diversity objectives, including third-party certification standards. The following are examples of some of our largest community partners:

- National Minority Supplier Development Council
- Women’s Business Enterprise National Council
- National Veteran Owned Business Association
- National Veteran Business Development Council
- National LGBT Chamber of Commerce
- Disability:IN
- WECConnect International
- U.S. Hispanic Chamber of Commerce
- U.S. Pan Asian American Chamber of Commerce
- Minority Supplier Development United Kingdom
- National Center for American Indian Enterprise Development

These organizations provide a platform for supporting our program, as well as networking directly with underrepresented business owners.

2024 Spend

Minority	Women	Veterans
\$2.3B	\$1.3B	\$123M
LGBT	Disability	Small Business
\$39M	\$54M	\$1.2B

In 2024, the firm's spending with small and diverse businesses supported over 15,000 new jobs, \$1.1 billion in employee incomes and contributing over \$630 million in Federal, Local and State taxes.

In addition to being one of only two financial intuitions in the Billion Dollar Roundtable, JPMorgan Chase has been named one of The Forefront 50: Top Corporations for Minority Businesses by National Minority Supplier Development Council; Top 50-Best of the Best Corporation for Inclusion by the National Business Inclusion Consortium; and inducted into the Top Corporations for Women's Business Enterprises Hall of Fame by the Women's Business Enterprise National Council.

EXHIBIT 3

J.P. Morgan Response to Question #5

JPMorgan Chase & Co. and/or its subsidiaries (collectively, the “Firm”) are defendants or putative defendants in numerous legal proceedings, including private civil litigations and regulatory/government investigations. The litigations range from individual actions involving a single plaintiff to class action lawsuits with potentially millions of class members. Investigations involve both formal and informal proceedings, by both governmental agencies and self-regulatory organizations. These legal proceedings are at varying stages of adjudication, arbitration or investigation, and involve each of the Firm’s lines of business and geographies and a wide variety of claims (including common law tort and contract claims and statutory antitrust, securities and consumer protection claims), some of which present novel legal theories. Based on current knowledge, the Firm believes it has asserted meritorious defenses to the claims asserted against it in its currently outstanding legal proceedings, intends to defend itself vigorously in all such matters and does not believe that any legal proceeding in the last five years would have a material effect on J.P. Morgan’s ability to serve the needs of LADWP. For further discussion, please refer to JPMorgan Chase & Co.’s publicly-filed disclosures, including its most recent Annual Report on Form 10-K and Quarterly Reports on Form 10-Q filed with the U.S. Securities and Exchange Commission (available at: <http://investor.shareholder.com/jpmorganchase/sec.cfm>) and J.P. Morgan Securities LLC’s FINRA BrokerCheck Report (available at <https://brokercheck.finra.org/firm/summary/79>). That being said, we are aware of the following matters involving J.P. Morgan Securities LLC which may be of interest:

- **Precious Metals and U.S. Treasuries Markets.** JPMorgan Chase & Co. (“JPMorgan Chase” or the “Firm”) has entered into agreements with the U.S. Department of Justice (DOJ), the U.S. Commodity Futures Trading Commission (CFTC) and the U.S. Securities & Exchange Commission (SEC) to resolve investigations into historical trading practices by former employees in the precious metals and U.S. treasuries markets, and related conduct between 2008 and 2016. In connection with the agreements, the Firm will pay a total of approximately \$920 million and has entered into a deferred prosecution agreement (DPA) with the DOJ. The DPA will expire after three years so long as the Firm and its subsidiaries fully comply with their respective obligations under the DPA. The Firm does not expect any disruption of service to clients as a result of these resolutions. The agreements fully resolve investigations by the DOJ, CFTC and SEC facing the Firm on these matters.
- **FINRA NON-TRADITIONAL ETF:** In June 2020, J.P. Morgan consented to entry of a FINRA Letter of Acceptance, Waiver and Consent, without admitting or denying the findings, that found violations of NASD Rule 3010(a) and FINRA Rules 3110(a) and 2010 in connection with certain solicited recommendations of volatility exchange traded products during the period January 1, 2014 to May 24, 2016 and imposed a fine of \$325,000 and restitution of \$333,619.34.
- **FINRA Market Access:** In May 2023, J.P. Morgan, without admitting or denying FINRA’s findings, reached a settlement (\$750,000) with FINRA and NASDAQ regarding its inquiry into compliance with SEC Rule 15c3-5, in connection with its Market Access erroneous order entry controls.
- **FINRA Short Interest Reporting:** On December 23, 2024, {J.P. Morgan}, without admitting or denying FINRA’s findings, settled with FINRA a matter involving short interest reporting which found that J.P. Morgan inaccurately reported short positions to FINRA at various times across the period 2008-2024, impacting the firm’s short interest reporting. As a result, J.P. Morgan violated FINRA Rules 4560 and 2010, and NASD Rules 3360 and 2110. J.P. Morgan agreed to pay a \$3mm fine and, as FINRA recognized in the settlement, has remediated the reporting issues and enhanced its controls.
- **FINRA SEC Rule 611:** During 2020 J.P. Morgan finalized settlements with FINRA and the CBOE, NYSE, and IEX exchanges (“the exchanges”) in connection with their review, of the Firm’s

compliance with SEC Rule 611 relating to latency in the Firm's routing of Intermarket Sweep Orders ("ISOs") to the exchanges, which in some cases traded through the National Best Bid or Offer ("NBBO"). The Firm agreed to pay a \$100K fine (split between FINRA and the exchanges) for violations of SEC Rule 611(c), which requires ISOs to meet certain routing requirements, and FINRA/Exchange supervision rules. As acknowledged in the settlements, the Firm completed remediation of these issues in 2021 through updates to its supervisory processes and technology infrastructure, including the addition of servers to handle increased message volumes and minimize processing delays.

- **SEC Matter - Micro Focus Digital Safe:** In June 2023, J.P. Morgan entered a resolution with the Securities and Exchange Commission, without admitting or denying the findings, of violations of Section 17(a) of the Securities Exchange Act of 1934 and Rule 17a-4(b)(4) thereunder in connection with deletion of certain electronic communications relating to the period January 1 through April 23, 2018 and imposing a \$4 million penalty.
- **IFUS- Request for Information:** On February 28, 2024, J.P. Morgan was issued a summary fine of \$5,000 for violating Rule 4.37(d) by failing to receive Exchange approval prior to executing a transfer on May 10, 2023 that resulted in a change in beneficial ownership.
- **FINRA Enforcement Registrations 8210 Request:** J.P. Morgan was fined \$190,000 as part of a Letter of Acceptance, Waiver and Consent ("AWC") relating to FINRA's findings that, between October 2020 and January 2022, the firm had permitted 10 individuals from the U.S. Investment and Corporate Banking group to perform investment banking activities requiring registration during periods when they were not registered with FINRA, and the firm's supervisory system was not reasonably designed to achieve compliance with FINRA's registration requirements. Other sanctions included a censure, and an undertaking which required certification that the firm remediated the issues identified in the AWC and supporting evidence of such remediation.
- **Private Equity Distributions:** On October 31, 2024, J.P. Morgan entered into a settlement with the Securities and Exchange Commission ("SEC") resulting in the SEC issuing an administrative order (the "Order"). J.P. Morgan consented to the entry of the Order, which found that J.P. Morgan willfully violated sections 17(a)(2) and (3) of the Securities Act of 1933 ("Securities Act"). The Order arose out of J.P. Morgan, from January 2019 through June 2022, using inaccurate disclosures with brokerage customers investing in certain products through a program which pooled customer money into a private fund ("Private Fund") and then invested in private equity or hedge funds ("Third-Party Fund") that customers might not be able to access directly. The Order found that J.P. Morgan did not disclose to the brokerage customers invested in the Private Funds that one of its affiliates would be exercising complete investment discretion over the timing of sales of certain shares of companies that had recently undertaken an initial public offering or another liquidity event and had been distributed by the Third-Party Funds back to the Private Fund in which the brokerage customers were invested.