

U.S. Bank Chicago Area Community Benefits Plan

U.S. Bank has long-standing and unwavering commitment to meeting the financial needs of all members of our communities. Our record shows our responsiveness to community needs through products, services, and investments in our communities. As U.S. Bank grows and expands in the Chicago area, so will our investment in low-and moderate-income neighborhoods. We are pleased that U.S. Bank and the Coalition to Save Community Banking (Coalition) have come to a mutually satisfactory resolution of the issues we have been discussing since U.S. Bank's acquisition of Park National Bank. This Community Benefits Plan will serve as documentation of the understandings we have reached as a result of our discussions.

Duration

The duration of this plan, and the commitments contained, is 3 years, covering the years of 2011–2013.

Employment Practices, Local Hiring (Employees and Vendors)

U.S. Bank strives to ensure that Bank employees, at all levels of the organization, reflect the communities in which they serve. To achieve this goal, the Bank will work with community-based employment service agencies in Cook County and established, credible non-profits in the communities represented by the Coalition engaged in employment initiatives, to identify qualified employment candidates, subject to U.S. Bank processes, parameters and employment requirements.

U.S. Bank will identify a Liaison to work with designated local non-profit organizations in the communities of Austin, Garfield Park, North Lawndale and Maywood, regarding employment opportunities for local residents with U.S. Bank. U.S. Bank will train Coalition members as to how to utilize the Company's online postings of job openings; and additionally, maintain contact with local non-profit employment programs to ensure their efforts to identify and place qualified employment candidates with U.S. Bank are successful.

Banking and Lending

The Bank will reach out to the un-banked and individuals with poor credit history with marketing, financial education, counseling, products and services that are accessible to low income residents. U.S. Bank and the Coalition will work together to develop U.S. Bank's 2011 Westside Financial Education Plan, to ensure effective coordination with local non-profit organizations already engaged in financial educational and counseling, use of appropriate outreach strategies to the communities represented by the Coalition, and development of relevant financial education and counseling materials. Housing Helpers of Maywood, South Austin Coalition Community Council, Bethel New Life, the Westside Federation, and Westside Health Authority will work with U.S. Bank to evaluate financial education and counseling efforts, as well as review marketing, products and services for low-income residents, the un-banked and individuals with poor credit history. U.S. Bank will provide general operating financial support through its cash charitable giving to the well-established organizations already conducting financial education and counseling in the communities that the Coalition represents and in other Chicago area communities to carry out joint efforts in this regard. U.S. Bank and the Coalition will work together

on its plans for on-site financial education counseling services at branch locations, including on site loss mitigation and foreclosure prevention counseling services. Specifically, U.S. Bank will identify to the public and the Coalition its designated loan origination officers or other appropriate U.S. Bank personnel to provide loss-mitigation modification services at U.S. Bank's branches for distressed borrowers whose mortgage loans are with U.S. Bank. Additionally, U.S. Bank's Loss Mitigation Ombudsman (currently based in California) will serve as a Liaison with branch personnel and the Coalition on these efforts.

U.S. Bank and the Coalition will monitor and assess the effectiveness of U.S. Bank's LMI lending products and the Bank's support of community redevelopment projects. U.S. Bank and the Coalition will also periodically review U.S. Bank's underwriting criteria for mortgage and small business lending to ensure that there is community awareness and understanding of the Company's financial products; explore creative new options for LMI lending products; and establish an appeals process for small business and/or non-profit loan applicants initially rejected by U.S. Bank.

The Coalition and U.S. Bank will monitor future regulatory changes and actions around these issues, and to work together to inform the communities represented by the Coalition of how the changing regulations may impact LMI residents.

The Coalition and U.S. Bank will review the Bank's investment in current CDFI, small business development and micro-lending programs, with the Coalition providing input and recommendations on the local CDFIs in which the Company invests, to ensure a focused and strategic impact of these activities on the communities that the Coalition represents.

U.S. Bank will provide bi-annual Loan Production Reports and make available that detail the number and type of loans originated (but not purchased) by U.S. Bank within the zip codes of the Coalition's LMI communities. Having drafted a Loan Production Report template, the Coalition and U.S. Bank will finalize changes to the draft format of the Bi-Annual Loan Production Report to be provided by the Company and periodically review that format as needed.

To ensure ongoing collaboration on all of the above Banking and Lending partnerships, U.S. Bank will designate a "Liaison Team" of Company personnel with the relevant skills and responsibilities to communicate with the Coalition on a regular basis.

Single Family and Multifamily Mortgage Foreclosure Prevention Support

The Bank will work proactively with local government and local nonprofit agencies to identify servicers on the loans for which U.S. Bank is Trustee. By taking a proactive approach, valuable time can be saved for both the borrowers and the housing counseling agencies working with those borrowers. The Bank also will continue to work on creative mutually agreeable solutions with the Coalition to address foreclosure issues.

Working with the Trust Division of U.S. Bank, the Company and the Coalition will work together to monitor recent and future foreclosure filings in the zip codes within the communities that the Coalition represents. The Company will provide a monthly report identifying servicers of delinquent mortgages for which U.S. Bank is the Trustee. U.S. Bank and the Coalition agree to work on creative ways to reach distressed borrowers, and assure the recordation of mortgage assignments.

Additionally, U.S. Bank and the Coalition will jointly plan and carry out events in local communities at which Loss Mitigation staff from U.S. Bank and those from U.S. Bank's servicers will work with distressed homeowners on mortgage repayment and mortgage modification plans. The first of these events will be held prior to the end of the first quarter of 2011. A series of local meetings in the communities the Coalition represents will be designed to bring together

distressed homeowners in danger of foreclosure with mortgage servicers and other resource agencies and programs for the purpose of facilitating foreclosure prevention. U.S. Bank will provide financial support through its cash charitable giving to support mortgage foreclosure prevention counseling and workshops, and door-to-door outreach to market the local meetings on foreclosure prevention.

U.S. Bank and the Coalition will work together to reach out to local officials and policy makers regarding the need to stem the foreclosure crisis in our communities.

Charitable Contributions

The Bank will assume and honor current written cash commitments made by Park National Bank and Park Bank Initiatives, as provided to the board by former Park National Bank senior management. We will strive to accommodate all prior commitments for lines of credit to the extent it is possible and prudent.

U.S. Bank will provide annual cash contributions for nonprofits in the seven county Chicagoland area at a dollar amount equal to 0.02% of deposits in the seven county area, as reported publicly by the FDIC on June 30th of the year prior to the giving period for the U.S. Bank, N.A. charter. In addition, U.S. Bank commits that 50% of each year's cash contributions will be contributions to organizations involved in affordable housing and economic development activities. At the end of 2013, U.S. Bank will review our cash contributions and comparable cash contributions of our peer financial institutions to evaluate whether our giving is at an appropriate level. The Coalition will provide feedback to and work with U.S. Bank in this evaluation.

U.S. Bank will reserve a portion of its annual charitable giving for the communities represented by the Coalition. A minimum of twenty-five percent (25%) of the contributions reserved for affordable housing and economic development activities will be reserved for the organizations representing the Westside and the near west suburbs to assure a strategic impact to help stabilize these communities. In 2011 U.S. Bank charitable giving focused on the communities the Coalition represents will help support initiatives to identify and counsel prospective purchasers of the homes to be acquired and rehabbed under the Community Restoration Fund, preparing them to qualify for home mortgages and responsible homeownership; and to support the general operating budgets of the Coalition members committed to implementing the CRF Agreement. The Bank and the Coalition acknowledge that U.S. Bank's charitable giving cannot be restricted to only those non-profits in the Coalition. U.S. Bank will establish of a local advisory committee which will include Coalition representatives to discuss charitable giving and the Coalition will be apprised of applicants from the Westside and the near west suburbs, and provide input to help to vet proposals from Coalition members.

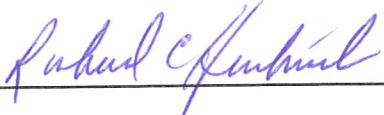
Evaluation

We believe ongoing dialogue with community partners is essential to success in our communities. The Coalition, other relevant parties (as yet to be clarified), and U.S. Bank will evaluate the plan on a six-month basis. All focus areas listed in this plan will be reviewed and discussed at those meetings. Regarding the charitable giving agreement: The 6-month evaluation of the CBA will also include an update on U.S. Bank's deposit base and its projections for the reserved funds for the Westside and the near west suburbs.

Community Restoration Fund

U.S. Bank and the Coalition for Community Banking are establishing a "Community Restoration Fund" Initiative, covered in a separate agreement, "to create a replicable, self-sustaining mechanism for providing capital for smaller, reputable and qualified nonprofits interested the in the purchase, rehabilitation and resale of foreclosed properties in hard hit, low- to moderate-income neighborhoods." Please refer to the CRF Agreement.

U.S. Bank, N .A. (for itself, and its subsidiaries and affiliates)

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