

PUBLIC DISCLOSURE

November 29, 2010

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**DEUTSCHE BANK TRUST COMPANY AMERICAS
RSSD No. 214807**

**60 Wall Street
New York, New York 10005**

**Federal Reserve Bank of New York
33 Liberty Street
New York, New York 10045**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S CRA RATING: Deutsche Bank Trust Company Americas is rated "OUTSTANDING."

The outstanding performance of Deutsche Bank Trust Company Americas ("Deutsche Bank") with regard to the Community Reinvestment Act ("CRA") is based on the following performance criteria:

- Deutsche Bank is a leader in community development lending (ranked second among eight peer banks) as a percentage of average assets;
- Deutsche Bank's community development lending activity demonstrated excellent responsiveness by focusing on the key community development needs of affordable housing and economic development in the bank's assessment area;
- A majority of the bank's community development lending was new, originated since its prior CRA evaluation;
- Deutsche Bank directs community development lending efforts to financial intermediaries which provide opportunities for the bank to leverage investment and community service activities to the community;
- Extensive use of innovative or complex community development loan arrangements, featuring flexible loan terms not routinely provided by private developers and investors;
- The majority of Deutsche Bank's community development investment activity was considered innovative/and or complex, and was considered highly responsive to the assessment area's need for affordable housing;
- Deutsche Bank has maintained and expanded community development commitments to intermediary partners during difficult market conditions and has sought out new relationships to address pressing community development needs, especially affordable housing and economic development;
- Deutsche Bank has demonstrated excellent responsiveness to current economic issues affecting its assessment area by participating in a restoration fund that will be used to acquire and rehabilitate foreclosed homes in neighborhoods hard hit by the foreclosure crisis;
- The bank has provided grants to several organizations that provide foreclosure prevention education, counseling and legal services to individuals facing foreclosure; and

- Leadership in providing qualified community development services through on-going board and committee memberships, the provision of financial technical assistance and the development of innovative programs to address community needs.

SCOPE OF EXAMINATION

Deutsche's performance was evaluated using the Federal Financial Institution Examination Council's "FFIEC" Interagency Procedures and Guidelines for Wholesale and Limited Purpose Institutions. The evaluation covers Deutsche Bank's activity from October 1, 2008 through September 30, 2010. Community development lending, qualified investments and community development services originated during the examination period were evaluated as qualifying community development activity. In addition, outstanding balances of prior examination community development loans and qualified investments were analyzed as of September 30, 2010. While the bank is evaluated on its community development activities, performance context is also considered. The performance context is a broad range of economic, demographic, institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated.

The bank's level of community development activity within its assessment area was evaluated. In addition, as a designated CRA wholesale bank, Deutsche Bank can receive credit for qualified community development loans made on a nationwide basis outside of its assessment area because it has adequately addressed community development needs within its assessment area.

DESCRIPTION OF INSTITUTION

Headquartered in New York City, Deutsche Bank is a state-chartered banking institution providing investment management, private banking and fiduciary services to high net worth individuals and institutions throughout the New York area. The bank's assets totaled \$46 billion as of September 30, 2010, with total deposits of \$14 billion and net loans of \$14 billion.

Deutsche Bank does not extend home mortgage, small business or consumer credit to retail customers or to the public at large. The bank does, however, originate some retail loans to accommodate its private banking clientele. On August 18, 1997, the Federal Reserve Board of Governors designated Deutsche Bank (previously known as Bankers Trust Company) as a wholesale bank for CRA purposes. Deutsche Bank's wholesale status was verified at this examination.

Deutsche's previous CRA examination was conducted as of December 1, 2008, at which time the bank was evaluated as a wholesale CRA bank and given an overall rating of "Outstanding." There are no financial or legal factors that would prevent Deutsche Bank from fulfilling its obligations under CRA.

DESCRIPTION OF ASSESSMENT AREA

Deutsche Bank has designated as its assessment area the five boroughs of New York City, which include Manhattan (New York County), Brooklyn (Kings County), Staten Island (Richmond

County), Queens (Queens County), and the Bronx (Bronx County). These areas are a part of MD 35644 (New York-White Plains-Wayne, NY-NJ).

The bank's assessment area has not changed since the last examination and is in compliance with the requirements of Section 228.41 of Federal Reserve Regulation BB, which implements the Community Reinvestment Act. A map of the assessment area is in Appendix B.

PERFORMANCE CONTEXT

The data used to describe the assessment area and evaluate the context in which the bank operates was obtained from publicly available sources including the U.S. Department of Commerce's Bureau of the Census, the U.S. Department of Labor, the U.S. Department of Housing and Urban Development ("HUD"), the New York City Department of Housing Preservation and Development ("HPD"), and New York University's ("NYU") Furman Center for Real Estate and Urban Development.

Demographic Characteristics

According to the 2000 Census, the population of New York City is over 8 million, representing a 9% increase since 1990. New York City is the most populous city in the United States with an estimated population of 8.3 million in 2009. This amounts to about 40% of New York State's population. New York City is exceptionally diverse. Throughout its history, the city has been a major point of entry for immigrants. Thirty six percent of New York City's residents were born in another country.

More than 42% of the census tracts in New York City are low- and moderate-income ("LMI"), with those areas concentrated in upper Manhattan, northern Brooklyn and Bronx County. New York City also has a large proportion of non-family households which tend to have lower incomes. A total of 40% of households in New York City are non-family households. Sixty percent of households in the bank's assessment area are families, compared to 64.5% for New York State, according to current estimates. Therefore community development activities that target LMI families are particularly important in New York City.

Income Characteristics

New York City has a high degree of income disparity. According to HUD, the MD's 2009 median family income was \$64,800 and 16% of the MD's families subsist below the poverty level.

HUD Median Family Incomes	2008	2009
MD 35644	\$63,000	\$64,800
New York City	\$59,700	\$61,600

There is a wide disparity in income levels across the MD as the median family income in Bronx County is just \$38,923 and 25% of families live below the poverty level, while in Manhattan the median family income is \$79,522 and 13.9% of families are below the poverty level. Low income and high poverty in New York City, particularly outside of Manhattan, make it difficult

for families to afford homes, indicating the need for economic development and affordable housing.

Housing Characteristics

New York City has approximately 3.2 million housing units, of which 29% percent are owner-occupied, 66% are rental units, and 6% are vacant. Home ownership rates are well below the national average of approximately 67%. Rental vacancy is approximately 3%, well below the 5% threshold defined to be a housing emergency and used to justify the continuation of rent control and rent stabilization. About 48% of rental stock is rent stabilized and 2% is subject to rent control. Nearly one in five residential units are either subsidized under one of the major government construction or rehabilitation programs or located in public housing. Finding housing, including affordable housing, in New York City can be challenging.

Housing is expensive relative to income levels in New York City, causing significant affordability issues for the LMI population. According to the National Association of Realtors the median sales price for existing single-family homes in the New York-Northern New Jersey-Long Island MD in 2008 was \$437,900 and \$381,400 in 2009. Home prices continued to decline in 2010 dropping an additional 15% after dramatic declines in 2008 and 2009. Condominiums, however, began to rebound increasing in price 4.2% and 1.1% in 2009 and 2010. Higher values are found in Manhattan (New York County). Despite the decline in real estate values most families throughout New York City, particularly LMI families, cannot afford to own a home because of the sharp disparity between incomes and housing costs. This indicates the need to provide affordable mortgage programs and develop affordable rental properties for LMI residents. Information received from community contacts also identified the need for affordable housing, especially programs for the lowest income New Yorkers. The majority of Deutsche Bank's community development lending and qualified investment activity targets affordable housing.

The number of units authorized by new residential building permits decreased sharply in 2010 even after steep declines in 2009. Citywide, 1,299 units were authorized in 2010 compared to 30,947 in 2008. Furthermore, in 2010, less than 15,000 new housing units received certificates of occupancy, down from 23,206 in 2009. Given that building permits are required before starting construction, opportunities for construction lending will decline for the next few years.

Labor, Employment and Economic Characteristics

New York City is a global hub of international business and commerce. The city is a major center for finance, insurance, real estate and the arts in the United States. Many major corporations are headquartered in New York City, including 43 Fortune 500 companies. New York is also unique among American cities for its large number of foreign corporations. One of ten private sector jobs in the city is with a foreign company.

ANNUAL UNEMPLOYMENT RATES					
Area				2008	2009
MSA 35620*				5.2%	8.8%
New	York	City	(5)	5.4%	9.5%

As summarized in the chart at right, overall unemployment rates increased during the examination period due to the recession brought on by the financial crisis.

Counties)**		
Source: *U.S. Department of Labor **NYS Department of Labor		

Unemployment levels in New York peaked in January 2010 reaching 10.1% Unemployment levels varied across the bank's assessment area, with higher unemployment rates in the New York City area and lower rates in the suburbs.

According to a New York Times article dated August 30, 2010 experts on the city's economy said that the effects of the recession were spread unevenly across the local landscape with low-income and less-skilled workers bearing most of the effects and leaving many people in dire financial condition. Notices of foreclosures spiked in 2009 at 20,102 declining 15% in 2010 to 16,911 compared to 7,353 in 2000. Additional performance context data for this assessment area is provided in the Assessment Area Demographic report below.

Assessment Area Demographics								
Assessment Area: MD 35644 NYC								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	326	14.7	310,882	16.6	128,229	41.2	574,246	30.7
Moderate-income	613	27.6	586,320	31.4	136,861	23.3	311,873	16.7
Middle-income	663	29.9	522,015	27.9	59,653	11.4	318,556	17.0
Upper-income	557	25.1	450,592	24.1	21,091	4.7	665,134	35.6
Unknown-income	58	2.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,217	100.0	1,869,809	100.0	345,834	18.5	1,869,809	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	471,421	30,113	3.3	6.4	411,139	87.2	30,169	6.4
Moderate-income	923,923	158,133	17.3	17.1	714,817	77.4	50,973	5.5
Middle-income	850,907	313,795	34.4	36.9	497,604	58.5	39,508	4.6
Upper-income	954,512	410,088	45.0	43.0	485,867	50.9	58,557	6.1
Unknown-income	149	4	0.0	2.7	28	18.8	117	78.5
Total Assessment Area	3,200,912	912,133	100.0	28.5	2,109,455	65.9	179,324	5.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	31,164	9.2	27,517	9.4	1,998	6.2	1,649	14.6
Moderate-income	70,706	20.9	63,090	21.5	4,605	14.2	3,011	26.6
Middle-income	70,779	21.0	62,984	21.4	5,206	16.1	2,589	22.9
Upper-income	158,897	47.0	135,537	46.1	19,436	60.1	3,924	34.7
Unknown-income	6,199	1.8	4,959	1.7	1,097	3.4	143	1.3
Total Assessment Area	337,745	100.0	294,087	100.0	32,342	100.0	11,316	100.0
	Percentage of Total Businesses:			87.1		9.6		3.4

It is important to note that the recession had an impact on the delivery systems that brought financing and resources to New York City's low- and moderate-income communities. The market for Low Income Housing Tax Credits was disrupted as corporate profits were diminished causing many investors to leave the marketplace. A consequence of the recession was that state and local governments cut spending even in critical areas. As new construction in New York City dropped off, New York City's HPD delayed completion of its New Housing Marketplace goals. Philanthropic giving also declined as a result of the decline of foundation endowment funds impacting the nonprofit community. These factors have all attributed to a very challenging community development environment.

CONCLUSIONS WITH RESPECT TO COMMUNITY DEVELOPMENT TEST

Deutsche Bank provided a high level of community development loans, qualified investments and community development services that demonstrated excellent responsiveness to the credit and community economic development needs in the bank's assessment area. Of all qualified community development loans and qualified investments, \$196 million or 43% are considered innovative and or complex and not the types of transactions provided by private lenders or investors.

Community Development Lending

As shown in Exhibit 1, Deutsche Bank's community development lending totaled \$321 million. The level of Deutsche Bank's community development lending activities compared favorably to the levels of other wholesale banks operating in the assessment area. Deutsche Bank ranked 2nd out of 8 banks in annualized community development lending as a percentage of average assets. According to a report entitled The State of Bank Reinvestment in New York City 2011 published by the Association for Neighborhood and Housing Development ("ANHD") covering 2008 and 2009, of wholesale banks in New York City Deutsche Bank ranked 1st in terms of deposits dedicated to community development lending. In terms of overall ranking for wholesale banks, ANHD ranked Deutsche Bank 1st in 2009 and 2nd in 2008.

A majority of the bank's community development lending, \$214 million, or 67%, was originated since the prior CRA examination. Community development lending increased 22.5% from the last examination while Deutsche Bank's assets increased 4.5%. A total of \$9.5 million or 3% of community development loans were extended to organizations that did not have a presence in the New York City assessment area or the broader regional area. Under the CRA regulation, a wholesale bank is able to get credit for qualifying community development activities outside of its assessment area if it has adequately addressed community development credit needs within its assessment area.

As noted below, Deutsche Bank's lending activity is primarily targeted toward affordable housing, which is a pressing community development need in its assessment area, as identified by demographic data and through communications with community contacts.

Exhibit 1		
Summary of Community Development Lending		
October 1, 2008 – September 30, 2010*		
Designation	(\$ millions)	%
Affordable Housing	\$317	99%
Economic Development	\$3	1%
Revitalize and Stabilize	\$0	0%
Community Services	\$1	<1%
TOTAL ACTIVITY	\$321	100%

*Lending activity includes new loans extended during the examination period as well as existing balances from the prior examination that were outstanding as of 9/30/2010. A total of 42 loans or \$106 million were outstanding from the prior CRA exam.

Lending activity was directed to financial intermediaries that provide loans and other services to community development organizations. Most of these intermediaries take a multifaceted approach to community development and their activities meet multiple community development definitions. In an effort to leverage its lending, Deutsche Bank maintains ongoing relationships with its intermediary borrowers that include opportunities for investment and service activity, as well as lending activity.

The majority of the loans were extended to organizations that provide affordable housing and were very responsive to critical housing needs in the assessment area. Many of the loans had flexible loan terms that resulted in reduced financing costs for the borrower. Flexible loan terms are especially important in facilitating affordable housing development in high cost areas such as New York City. Flexible loan terms can include combining grants and below-market financing to inject early stage support for community development efforts, maintaining support and expanding commitments to community development organizations and nonprofit organizations during difficult market conditions, and utilizing financial expertise to develop financial solutions to create and preserve affordable housing. The following are some examples of Deutsche Bank's community development loans:

- Renewal of a \$25 million unsecured line of credit to a New York-based financial intermediary that will be used to make short term loans to its affiliates or lend directly to community development groups. The affiliates are located in offices across the United States. The proceeds of the line of credit are intended to cover project costs associated with the rehabilitation of housing under the Low-Income Housing Tax Credit ("LIHTC") program until bridge financing is secured.
- A \$6 million participation in a \$32 million fund established to help stabilize neighborhoods that were hard hit by the financial crisis. The fund will acquire 100 foreclosed or distressed 1-4 family properties in New York City neighborhoods that have the highest concentration of foreclosures.

- Renewal of a \$10 million line of credit to Community Development Trust (“CDT”). CDT’s mission is to increase the stock of affordable housing and strengthen low-income neighborhoods by purchasing mortgages in the secondary market and by making long-term equity investments in multifamily properties. Loans by CDT include a \$10 million commitment to the Community Preservation Corp, a non-profit developer of affordable housing in the metropolitan New York area. As a mission-oriented Real Estate Investment Trust, CDT’s charter requires that it invest in assets that meet CRA guidelines.
- A \$10 million revolving line of credit to a New York City-based non-profit organization whose mission is to solve homelessness through innovative programs that transforms people, buildings and communities. The credit facility included \$8 million of market rate senior debt and \$2 million of below market rate subordinated debt. Deutsche participated with other institutions in the \$8 million market rate debt (remaining as agent bank) and retained the \$2 million below market rate lending facility.
- An \$8 million participation in a \$72 million standby letter of credit facility that provides credit support for the construction financing of 340 LMI affordable units in East Harlem, New York. The facility utilizes subsidies from NYC’s Housing Development Corporation (“HDC”) to rehabilitate 14 city-owned vacant or dilapidated buildings into affordable units for LMI families.
- A \$12.3 million participation in a \$34 million letter of credit to finance 151 units of affordable housing in the South Bronx of New York City. The facility utilizes subsidies from NYC’s HDC to make the units affordable for LMI families.
- Through Deutsche Bank’s “soft” loan program, the bank provided flexible financing by making 16 interest free loans totaling \$1.3 million to nonprofit developers in NYC to fund pre-development costs for supportive housing for homeless and low-income families. Additionally, 23 loans under this program, totaling \$1.4 million, are outstanding from the prior CRA examination.

Qualified Investments

As shown in Exhibit 2, Deutsche Bank made \$136 million in qualified investments, \$60 million of which, or 44%, were new investments made since the prior CRA evaluation. The level of Deutsche Bank’s qualified investment activity compared favorably to other similarly-situated wholesale banks, and investments were highly responsive to community development needs in the bank’s assessment area. According to ANHD’s report on bank reinvestment in New York City, Deutsche Bank was a leader in terms of CRA-eligible philanthropy. Fifty-four percent of the bank’s investment activity was considered innovative and/or complex and were not the types of investments provided by private investors. Examples below provide specific detail.

As with lending, most community development investment activity was concentrated in New York City’s five boroughs, the bank’s assessment area. Under the CRA regulation, Deutsche

Bank is able to get credit for qualifying community development activities, including qualified investment activity, outside of its assessment area, because it has adequately addressed community development credit needs within its assessment area. Accordingly, qualified investments outside the assessment area were also considered in this evaluation.

Exhibit 2		
Summary of Qualified Investments		
October 1, 2008 – September 30, 2010*		
Designation	(\$ millions)	%
Affordable Housing	\$114	84%
Economic Development	\$9	7%
Revitalize and Stabilize	\$6	4%
Community Services	\$7	5%
TOTAL ACTIVITY	\$136	100%

** Investments include investments and grants made during the examination period as well as existing balances from the prior examination that were outstanding as of 9/30/2010.*

Deutsche Bank’s investments include 337 grants and/or contributions that totaled \$11 million. Many of the grants focus on organizations that create affordable housing that is intelligently designed, has open space, or retail space, or to organizations that serve cultural, health, or educational purposes or provide community centers for a LMI population.

Examples of qualified investments include the following:

- In 2010, Deutsche Bank made a \$3 million commitment to purchase participations in pools of mortgages under the Community Preservation Corp’s Master Permanent Loan Participation Program. The program offers permanent financing for small developers / owners of affordable housing in New York. Deutsche Bank acts as the agent bank for the Community Preservation Corp in managing the program.
- A \$5 million equity investment in a \$150 million fund that is both an investor and developer of residential properties in LMI neighborhoods. The majority of the fund’s properties are located in New York City.
- A \$3 million equity investment in a green fund that seeks to acquire, rehabilitate, and retrofit buildings in transit-oriented neighborhoods. Deutsche Bank has targeted its investment to specifically support affordable housing projects including two developments in Harlem: the green renovation of 107-145 West 135th Street, a development of ten adjacent six-story elevator buildings that has received the first loan from HUD’s Green Retrofit Loan Program; and the Tapestry, a 185-unit mixed-use, mixed-income project on 124th Street.

- A \$4 million investment in a LIHTC equity fund that has taken the lead in managing projects in which the fund's investments have a local nonprofit organization or a for-profit developer with a community development objective. The tax credits provide a direct subsidy to the project, allowing it to remain affordable for low- and moderate-income residents in New York City.
- Thirty-four grants, totaling \$2.1 million, to nonprofit developers in New York City to fund pre-development costs for supportive housing for homeless and low-income families.

Innovativeness and Complexity

Deutsche Bank made extensive use of innovative and/or complex qualified investments, community development loans and community development services. Close to half (45%) of the bank's total community development loan and qualified investment activity is considered innovative and/or complex. The largest proportion of Deutsche Bank's investment dollars, \$43 million, is allocated toward Low-Income Housing Tax Credit ("LIHTCs") investments. These investments are vital in the development of affordable housing in New York City and are considered complex for the bank as investor because of their highly technical accounting and management requirements. Secondly, the bank has proactively taken a leadership role in putting lending and investment deals together and by acting as an agent or sponsor bank. Deutsche Bank has a total of \$113 million in community development loans in which it has taken a lead position.

Additionally, \$34 million are equity investments in various funds in which Deutsche Bank's role as agent bank added a dimension of complexity in the early formation of the fund.

The bank relies on its strong relationship with non-profit organizations and financial intermediaries to deploy credit and investments, and to perform services for LMI communities. It has maintained and expanded its commitments to intermediary partners during difficult market conditions and has sought out new relationships with high performing organizations both inside and outside its assessment area to enable the construction and preservation of affordable housing.

Some loan and investment facilities originated by Deutsche Bank have offered creative new solutions to facilitate community development. Examples follow:

- Deutsche's Bank's working capital award program provides \$225,000 over three years to community development corporations to assist in their efforts to preserve and rebuild neighborhoods. Efforts include early-stage development of affordable housing and community development projects, such as community centers that provide technical assistance to small businesses. Early stage financing is a key element in launching affordable housing projects, especially in high cost areas such as New York City. The awards are structured as a \$150,000 grant and a \$75,000 "soft" loan, which provides flexible financing at 0% interest. The bank has committed \$1.125 million for these awards. The bank is in its seventh round of this award program.
- Deutsche Bank's Supportive Housing Acquisition and Rehabilitation Effort ("DB SHARE") provides similar financing to 11 organizations who are involved in

rehabilitating Single Room Occupancy hotels, developing supportive housing for veterans, young adults, and single adults with mental illnesses, and developing supportive housing for low-income families and seniors.

- Deutsche Bank's innovativeness can be demonstrated by its promotion of green community development through neighborhood energy loan programs and building energy efficiency programs targeted toward affordable housing. Green initiatives and technology make affordable housing development projects more sustainable by lowering the costs associated with maintaining the buildings, and also help to make the homes more affordable for LMI residents. Investments include the \$3 million investment mentioned earlier as well as \$420,000 in grants to four community development organizations involved in affordable housing to assist in weatherization and energy efficiency upgrade programs.
- Deutsche Bank was instrumental in the formation of the Community Preservations Corp.'s Neighborhood Energy Loan Program, which includes a \$55 million revolving loan fund in to finance energy efficiency improvements to multifamily buildings. The fund expects to retrofit 1500 – 2500 units in the first year. Many of these units are in low- and moderate-income areas. Deutsche Bank took a \$15 million participation in the fund. Deutsche Bank was instrumental in the planning of the fund's formation by bringing together an advisory committee that included utilities, builders, and governmental agencies.
- Deutsche Bank's investment in notes from Habitat Humanity International's Flexible Capital Access Program ("Flex Cap") can be considered complex because of their unique legal structure and the collateralization requirements of notes between Habitat's affiliates and Habitat. The program allows Habitat's affiliates to borrow against their pool of mortgages and use the funds to acquire land, develop infrastructure and fund construction activities for low- and moderate-income individuals. Habitat's mortgages are interest free.
- Deutsche Bank partnered with the Community Preservation Corp ("CPC") to provide \$24 million in construction financing to preserve and create 332 units of affordable housing in NYC. The innovative financing structure developed by Deutsche Bank freed up CPC's capital, which in turn was used to support creation of additional affordable housing. Additionally, Deutsche Bank as lead bank took an 80% participation in the credit facility and sold off \$5 million in sub-participations to two foreign banks operating in NYC.

- Deutsche Bank’s responsiveness to the recent foreclosure crisis is demonstrated by its investment in the Restoring Urban Neighborhood Fund, a fund started by New York City’s Department of Housing Preservation and Development to acquire 100 foreclosed or distressed 1-4 family homes in NYC neighborhoods that have the highest concentration of foreclosures. Deutsche Bank has also provided grants to several organizations providing foreclosure prevention education, counseling, and legal services to individuals facing foreclosure.

Community Development Services

Deutsche Bank is a leader in providing community development services in New York City. The bank provides needed community development financially-oriented services throughout its assessment area by participating in on-going board and committee memberships, by providing financial technical assistance, and by developing new and innovative programs that respond to identified needs within distressed communities. Exhibit 3 summarizes the different types of services provided.

Exhibit 3 Summary of Community Development Services October 1, 2008 – September 30, 2010	
<u>ACTIVITY TYPE</u>	Number of Activities
On-Going Board & Committee Memberships	125
Technical Assistance Events	24
Seminars	17
TOTAL	166

Most of the services provided are ongoing activities requiring regular participation on boards, loan committees and advisory committees of local community development organizations. Participation is at the highest levels of management within Deutsche Bank, including the bank’s president, who serves as a director on the boards of five community development organizations.

Many officers and staff at Deutsche Bank offer financial technical assistance to community development organizations, in addition to their service on the boards of those organizations.

Some examples of qualified community development services follow:

- One Deutsche Bank Managing Director served as chairman of New York City Local Initiative Support Corporation (“LISC”) for 12 years and in that capacity has set the

organization's strategic direction. The same Managing Director has provided financial technical advice to the Myrtle Avenue Revitalization Project Local Development Corporation, is chairman of the Neighbor Opportunities Fund, a partnership of financial intermediaries and donors from the corporate and foundation sectors that targets development in strategically located neighborhoods, and is a board member and former chairman of Living Cities, National Community Initiative, a collaborative effort of 15 financial institutions, foundations and government agencies committed to the revitalization of America's urban centers. Under his direction, Living Cities launched the Integration Initiative, a multi-year effort designed to advance successful models for urban investment and transformation.

- Another Deutsche Bank Officer is a board member of Enterprise Community Partners, a nonprofit intermediary that provides capital and expertise for affordable housing and community development.
- Deutsche Bank employees serve as trainers and advisors for Streetwise Partners, which provides job readiness training to under-employed and unemployed New Yorkers.
- Deutsche Bank offers financial literacy programs to LMI young people, such as "Banking on Our Future," which provides youth with the basic information and core skills necessary for building their financial futures.

Innovative Services

Deutsche Bank also provided innovative community services that are responsive to specialized community development needs within its assessment area and that focus on affordable housing and community revitalization efforts. Examples of innovative service initiatives include the following:

- Deutsche Bank created an ambassador program that trains senior executives as ambassadors for its social responsibility efforts and allows them to take leadership roles in the community. Thirty managing directors across the bank were selected, and each ambassador was given a grant for a nonprofit organization or school of his/her choice and a chance to be placed on a board of a nonprofit organization.
- Deutsche Bank started a multi-stakeholder working group comprised of representatives from public sector agencies, community development financial institutions, citywide and national nonprofit organizations, and utilities to ensure that LMI communities benefit through energy efficient "green" technology in multi-family buildings. The bank provided technical expertise to the community through its leadership in this effort. By fostering engagement and cooperation among public and private sector affordable housing practitioners and non-profits, all participants have benefited by learning about and implementing technologies that will benefit LMI individuals by providing and maintaining sustainable, green, affordable housing.
- Deutsche Bank served as founding funder and technical advisor for the creation of the Center for New York City Neighborhoods, a public-private partnership that provides

and coordinates city-wide programs including legal services, housing counseling, and consumer information to help distressed homeowners and renters facing foreclosure. The organization has contracts with 28 community-based non-profit organizations. The center has provided counseling and legal services to nearly 14,000 homeowners. Deutsche Bank provided the second installment of its \$200,000 start-up grant during the examination period and committed to extend support for a third year for an additional \$100,000.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices were identified as being inconsistent with helping to meet community credit needs.

CRA APPENDIX A

GLOSSARY

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All agencies have adopted the following language. Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community Development Financial Institution ("CDFI"): A CDFI is an organization that has been certified by the U.S. Treasury as a provider of loans and services that assist specially funded institutions that revitalize LMI areas and assist LMI persons.

Family: A family is a group of two people or more related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (“HMDA”): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancings of home improvement and home purchase loans.

Household: A household consists of all persons who occupy a housing unit. Persons not living in households are classified as living in group quarters.

Low-income: Individual income that is less than 50% of the area median income, or a median family income that is less than 50%, in the case of a geography.

Metropolitan Area (“MA”): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

Middle-income: Individual income that is at least 80% and less than 120% of the area median income, or a median family income that is at least 80% and less than 120%, in the case of geography.

Moderate-income: Individual income that is at least 50% and less than 80% of the area median income, or a median family income that is at least 50% and less than 80%, in the case of geography.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Small loan(s) to business (es): A loan included in “loans to small businesses” as defined in the Consolidated Report of Condition and Income (“Call Report”) and the Thrift Financial Reporting (“TFR”) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Upper-income: Individual income that is more than 120% of the area median income, or a median family income that is more than 120%, in the case of geography.

Wholesale bank: A bank that is not in the business of extending home mortgage, small business, small farm or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with the CRA regulation.

Deutsche Bank Trust Company Americas

Assessment Area

October 1, 2008 - September 30, 2010

Legend

- Assessment Area
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