



**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?

\_\_\_\_\_

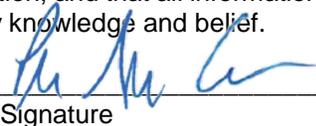
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**CERTIFICATION UNDER PENALTY OF PERJURY (\*)**

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
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(\*) 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](mailto:CAO.DEBT@LACITY.ORG).**

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



## EXHIBIT 1

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

<b>Name of Charitable Organization</b>	<b>Type</b>	<b>Amount (\$)</b>
Association of Retirement Organization in Higher Education (AROHE)	Virtual Seminar Sponsorship	2,500.00
Centro de Rehabilitacion Ebenezer	Charitable Contribution	5,000.00
Youth Mentoring Connection	Woman of Courage	6,000.00
2020 Women on Boards	2020 Women on Boards	10,000.00
Community Partners dba Partners for Pediatric Vision	Wine & Dine to keep kids in sight 2019	4,000.00
Downtown Womens Center	Day of Service - Breakfast Club	2,500.00
Race to Erase MS	Race to Erase MS Gala 2019	5,000.00

## EXHIBIT 2

# RAYMOND JAMES®

June 12, 2020

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

Dear Mr. Chou:

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 Vice President of Procurement for Raymond James, I have the responsibility to ensure that the Firm's values with regard to diversity are extended to our suppliers as well.

Raymond James Procurement is leading the effort to formalize a Supplier Diversity policy and program, and communicate enterprise-wide by December 2020. We have secured an executive sponsor for the program and we are currently working on implementing a website dedicated to Supplier Diversity. We have developed an approach to ensure that supplier diversity is considered as part of the supplier selection process, and our policies and procedures have been updated to incorporate supplier diversity accordingly. In October 2016, Raymond James contracted with a third party to assist with the diversity designation and classification of our supply base, which enabled Procurement to report diverse spend and percentage. In October 2017, Raymond James implemented the PeopleSoft ERP applications, including the Supplier Contract Module, which will provide contract reporting against our list of diverse suppliers.

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  
Vice President, Procurement  
Raymond James & Associates, Inc.

## EXHIBIT 3

### 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.