

May 15, 2014

Mr. Larry Parker
City Cash Manager
City of Minneapolis
Via email

Re: Financial Institution Disclosure Form

Dear Larry:

We are providing this letter as our statement of corporate citizenship in response to the attached request.

Galliard Capital Management Overview

Galliard Capital Management (“Galliard”) is an SEC registered investment advisor located in the City of Minneapolis. Galliard provides investment management services to institutional clients only. These services include recommendations as to stable value portfolios (including the purchase of wrap contracts), asset allocations and the purchase and sale of fixed income securities. Galliard does not provide underwriting services.

Although Galliard is a wholly-owned subsidiary of Wells Fargo Bank, Galliard does not provide banking, lending or custody services to either retail or institutional clients. This response is for Galliard only and is not intended to cover any services which may be provided to the City of Minneapolis by Wells Fargo Bank or any other subsidiary of Wells Fargo, Inc.

Galliard Capital Management Services Provided to the City of Minneapolis

Galliard Capital Management provides fixed income investment management services to the City of Minneapolis.

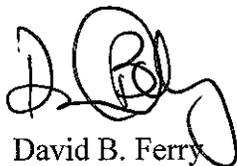
Galliard Capital Management Statement of Corporate Citizenship

- (a) Galliard supports its employees in contributing to charities either monetarily or through volunteering their time. Galliard, through Wells Fargo, matches individual employee contributions to eligible educational and charitable foundations up to an annual limit. Galliard, through Wells Fargo, also provides employees two days of paid time each year to participate in volunteer activities.

(b) Galliard does not utilize subcontractors in providing services to its clients and therefore does not have a policy regarding the hiring of subcontractors.

If you have any questions about our response or need any additional information, please don't hesitate to contact me.

Best Regards,

A handwritten signature in black ink, appearing to read 'D. B. Ferry', with a stylized flourish extending from the end.

David B. Ferry
Senior Director
612-667-6184

Attachment

Financial Institution Disclosure Form

City of Minneapolis, Minnesota

Financial institutions which participate in or desire to participate in City of Minneapolis programs or the provision of banking services for the city shall compile and provide electronically to the City Finance Department the following information:

- (1) For the City of Minneapolis, by census tract, provide the information required on the mortgage loan disclosure statement pursuant to the Home Mortgage Disclosure Act, 12 U.S. C. Section 2801 et seq. and laws amendatory thereof and supplementary thereto ("HMDA"), for the previous fiscal year.
- (2) For any Metropolitan Statistical Area in Minnesota within the financial institution's CRA assessment area, provide a copy of the institution's most recent community reinvestment act statement, as required by the Community Reinvestment Act of 1977, pursuant to 12 U.S.C. Section 2901 et seq. and laws and regulations amendatory thereof and supplemental thereto CRA for the previous fiscal year.
- (3) For the City of Minneapolis, provide information related to loan modifications and foreclosures on residential mortgages on properties located within the city, which shall include data as of the end of the financial institution's previous fiscal year on the following items.
 - a. Percentage of residential mortgages that are current or missed only one (1) payment ;
 - b. Percentage that are seriously delinquent (60+ days late);
 - c. Percentage that are actively engaged to find a workout option;
 - d. Number of customers that have completed or started a workout arrangement;
 - e. Number of customers that have completed a workout arrangement and the number of workout arrangement that resulted in each of the following outcomes;
 1. Modification to lower monthly mortgage payments;
 2. Principal reduction to reduce the mortgage amount owed;
 3. Modification or reduction on the second mortgage;
 4. Mortgage payments reduced or suspended during period of unemployment;
 5. Bankruptcy;
 6. Short sale;
 7. Deed in lieu of foreclosure.

- f. Number of the financial institution's real estate-owned ("REO") properties for sale;
 - g. Number of completed foreclosure sales;
 - h. Number of the financial institution's REO properties donated or discounted to nonprofits or the city.
- (4) As of the end of the previous fiscal year, provide information on the locations of banking services located in the City of Minneapolis.
- (5) As of the end of the previous fiscal year, for businesses located in the City of Minneapolis, provide information on the number of small business loans including:
- a. Number and total loan amounts at origination less than or equal to \$100,000;
 - b. Number and total loan amounts at origination greater than \$100,000 but less than or equal to \$250,000 ;
 - c. Number and total loan amounts at origination greater than \$100,000 but less than or equal to \$1,000,000;
 - d. Number and total loans to businesses with gross annual revenues less than or equal to \$1,000,000.
- (6) As of the end of the previous fiscal year, provide information regarding the closing of any branch or ATM service located in the City of Minneapolis and an affirmative statement that you are in compliance with Section 42 of the Federal Deposit Insurance Act (12 U.S.C. 1831) when closing any branch, including the 90 day notice period for public comment.
- (7) Provide a Community Reinvestment Plan describing current and proposed initiatives to address the financial needs of the city, its residents and businesses, and include a discussion of the following services, products and areas of activity:
- (a) Affordable check cashing and other transactional services used by consumers with limited banking accounts or experience;
 - (b) Small consumer loans, including those that serve as an alternative to payday loans;
 - (c) Participation in city sponsored neighborhood development programs;
 - (d) Efforts to support homeownership education and foreclosure prevention education and counseling;
 - (e) Equitable contributions to community based non-profit organizations in the city that engage in neighborhood development.

- (f) Provision of full service banking in city neighborhoods, including branches, services and technologies; and
- (g) Plans to provide and market loans and investment products that help create loans throughout the city including in low and moderate income neighborhoods and to low and moderate income consumers.

Investment Banks

Investment banks shall not be subject to the disclosure requirements above as long as they seek or perform only investment banking business for the City. Banks that provide the City with underwriting services including the buying and selling of stocks, bonds and other securities and other debt related services shall provide the following.

A statement of the corporate citizenship which shall include but not be limited to:

- (a) Participation in charitable programs or scholarships within the City during the year immediately predating the filing
- (b) Internal policies regarding utilization of subcontractors which are designated as “women owned”, “minority owned”, or “disabled” business enterprises

Please return the completed Financial Disclosure Form to the City Cash Manager at the following email address;

larry.parker@minneapolismn.gov