

IN-HOUSE PRO BONO IN PRACTICE PROFILE: WELLS FARGO

December 2020

Wells Fargo launched its formal Pro Bono Program (the Program) in 2014. Since then, it has become an integral part of Wells Fargo’s commitment to volunteerism, community service, charitable giving, and diversity and inclusion.

The Program’s efforts intersect with and support Wells Fargo’s thriving Corporate Responsibility (CR) program, which promotes signature themes across the enterprise, including housing affordability and supporting small businesses, by engaging in pro bono matters related to these themes.

The Program has strong support from the Wells Fargo Legal Department leadership team, including its General Counsel, Ellen Patterson. She came to Wells Fargo as Senior Executive Vice President and General Counsel in March 2020.

“I joined Wells Fargo, in part, because of the tremendous commitment the company has to the communities where it operates,” she said. “I am delighted that the commitment includes a strong and thriving pro bono program, with a talented group of attorneys and legal professionals who continually seek to strengthen its reach and its impact. As attorneys and legal professionals, we are proud to be part of a profession with a culture of providing our legal services to help those in need.”

Over the years, the Program has used the Legal Department’s talent in service of its local communities, while also aiding the Department in a variety of ways:

- Providing leadership opportunities for attorneys, paralegals, and administrative professionals
- Creating opportunities to work with internal partners like the Wells Fargo Modern Slavery Working Group, the Veterans Team Member Network, and the Legal Department Diversity & Inclusion Council
- Giving legal professionals opportunities to operate outside of their comfort zones and their daily practice areas, while developing new skill sets that build an individual’s value to the Legal Department and provide career advancement opportunities

2020 provided the most difficult challenge since the Program’s inception – learning to adapt to the coronavirus pandemic while still serving local communities in need of legal assistance. With the help of creative legal services agency and law firm partners, the Program fulfilled its existing commitments and started providing remote pro bono opportunities to employees.

General Program Information	
Offices with Legal Staff	Wells Fargo’s legal team is headquartered in New York, NY. Other legal offices are located in cities throughout the United States

	(including San Francisco, CA; Minneapolis, MN; and Charlotte, NC), in the U.K. (London), and in Asia (Hong Kong and Singapore).
Size of Legal Department	Wells Fargo's Legal Department employs 1,346 Legal professionals. This includes approximately 800 lawyers and approximately 500 paralegals and administrative professionals.
Pro Bono Leadership Structure	<p>To launch Wells Fargo's formal Pro Bono Program in 2014, Legal Department leaders recruited a team of Local Coordinators to lead local efforts, and established a Steering Committee to provide overall leadership of the Program. The Steering Committee and team of Local Coordinators represent Legal Department offices in the U.S., U.K., and Asia.</p> <p>The Steering Committee leads the overall program and its development. The Steering Committee is comprised of leaders responsible for the Program's budget, community relations and corporate philanthropy, employment/HR questions (including time away from work), communications (internal and external), conflicts of interest, metrics and reporting, diversity and inclusion, law firm and legal services agency partnerships, national pro bono week, staff involvement, and recruitment/onboarding efforts.</p> <p>Local Coordinators are responsible for leading local Legal Department offices, including identifying local pro bono opportunities that match well with local Legal Department office capabilities and interests. Local Coordinators are also responsible for cultivating relationships with law firms and legal services agencies with whom Wells Fargo legal professionals can work on specific training and legal representations. The Local Coordinators and Steering Committee have routine calls to share information, hear from guest speakers, and make decisions to advance the overall aims of the Program.</p> <p>The Program benefits from support by the Legal Department's Senior Leadership Team. The Program also has Co-Executive Sponsorship filled by a rotating team of Deputy General Counsel.</p>
Pro Bono Policy	<p>Wells Fargo adopted a pro bono policy in 2014. The policy addresses all aspects of the program, including:</p> <ul style="list-style-type: none"> • Program guiding principles • Activities requiring advance approval by the Steering Committee • Overall scope of pro bono services • Conflict of interests

	<ul style="list-style-type: none"> • Tracking activities • Professional liability coverage • Details about roles and responsibilities assumed by local coordinators and steering committee members
Mandatory Pro Bono	<p>There is no requirement to provide pro bono service, but participation is strongly encouraged. Legal professionals can identify pro bono related commitments in their annual goal setting, which can become part of the annual performance review process, but pro bono service is not required as part of a Legal Department employee’s annual review and performance assessment.</p> <p>Wells Fargo expressly supports and endorses its commitment to community service and volunteerism. For example, community care grants are available to all volunteers across the company, and pro bono service qualifies pro bono volunteers for grants to charities of their choice.</p> <p>Wells Fargo also expressly supports through its Team Member networks and Diversity, Equity and Inclusion (DE&I) programming the importance of a variety of volunteer efforts that intersect with pro bono programming (e.g., veteran pro bono work intersects with the aims of the Veterans Team Member Network, while racial justice pro bono opportunities intersect with the aims of the DE&I program).</p>
Communications	<p>Communications are led and managed by a Steering Committee leader who works with volunteers, law firm and legal services agency partners, as well as the corporate communications team, to publish digital articles about the Pro Bono Program on the Legal Department internal website, email announcements, annual reports, and other notifications about pro bono opportunities and accomplishments. The Program also hosts routine conference calls for Local Coordinators to share updates with each other about projects they are handling in their local communities, to hear guest speakers, and to share ideas and best practices. The Steering Committee also has routine conference calls to discuss Steering Committee leadership topics and the overall management and development of the Program.</p>
Recognitions/Awards	<p>The Wells Fargo Legal Department has an internal website where it routinely publishes various articles regarding the Pro Bono Program, including award recognition, attorney spotlights, and summaries of specific projects undertaken by Legal Department employees.</p> <p>Additionally, legal services agency partners and law firm partners recognize the Wells Fargo Pro Bono Program and its volunteers for their service tied to specific efforts. For example, in 2019 and 2020,</p>

	<p>the New York City and Charlotte Legal Department offices were recognized by Cadwalader, Wickersham & Taft for their contributions to the Start Small Think Big organization and their work with the Latin America Coalition. The Charlotte office also received the 2020 Corporate Pro Bono (CPBO) Pro Bono Partner Award for its work with other corporate law departments, legal services agencies, and local law firms on the Charlotte Triage program.</p>
Tracking Pro Bono	<p>The Department currently has an ad hoc process for tracking pro bono, and is working toward building out a more formal tracking and reporting system. There is a formal Steering Committee position to manage this important function.</p>
Partnerships	<p>Wells Fargo partners with law firms, legal departments, and legal services organizations to provide pro bono legal services.</p> <p>While some pro bono engagements do not require partnerships with law firms, many of Wells Fargo’s most successful and well established pro bono programs have benefited from the teamwork and support law firms can provide. Law firms provide important support and learning opportunities.</p>
Professional Liability	<p>Wells Fargo has a specific professional liability policy for its Pro Bono Program. Volunteers also depend on liability coverage provided by legal service agency partners and law firms with which they partner on specific engagements.</p>
Involvement of Paralegals and Staff	<p>Paralegals and administrative professionals are encouraged to participate in pro bono and are eligible for Program leadership opportunities as Local Coordinators and Steering Committee members.</p>
Pro Bono Projects	
<i>Veterans</i>	<p>The Los Angeles Pro Bono team collaborated with O’Melveny & Myers* to staff the Los Angeles County Bar Association (“LACBA”) program by the Counsel for Justice – the Veterans Legal Services Project’s free legal clinic. The Veterans Legal Clinic gives volunteers the opportunity to use their legal skills to assist veterans—many of whom struggle with PTSD, depression, and substance abuse—who need a hand to turn their lives around in a path of growth, community service and reintegration into society.</p> <p>Since the onset of the COVID-19 pandemic, Counsel for Justice has conducted virtual legal clinics using virtual platforms. At the clinic, a team of volunteers from Wells Fargo provided general information to</p>

	veterans about the process of resolving outstanding traffic citations and warrants as well as expunging criminal records.
<i>Civil legal aid</i>	The Des Moines Pro Bono team partnered with DLA Piper* and Legal Aid Chicago to support a virtual clinic via Zoom. In collaboration with an attorney from Legal Aid Chicago, volunteer paralegals and attorneys from Wells Fargo counsel clients on a variety of legal issues. Through the virtual clinic, volunteers sign up for one hour shifts, during which they meet clients, interview them about their legal questions, and consult with a Legal Aid Chicago lawyer before providing brief advice.
<i>Family Law</i>	The Charlotte Pro Bono team has dedicated volunteer time to child custody cases with Council for Children’s Rights and domestic protective order matters with Safe Alliance.
<i>Voting Rights</i>	Wells Fargo volunteers from Charlotte participated in election protection by taking calls on the voter protection hotline established by Democracy North Carolina. In 2020, volunteers worked for a total of 66 hours answering questions and providing information to callers.
<i>Estate planning</i>	Volunteers from the Charlotte office drafted estate planning documents for 18 local Veterans in the second annual Wills for Warriors event. After remote drafting and virtual client meetings, the Veterans attended a socially-distant execution event in the parking lot of Charlotte Center for Legal Advocacy (“CCLA”), where partner law firm McGuireWoods* and CCLA performed execution and notarization of documents. Although the event looked very different in 2020 than in 2019, when it was held in-person, it still allowed volunteers to successfully serve their pro bono clients.
<i>Criminal expungement</i>	Early in 2020, the Charlotte office hosted an Expunctions Clinic, led by the North Carolina Pro Bono Resource Center, at which several volunteers worked on expunctions cases.
<i>Driver’s license restoration</i>	The Charlotte office participated in a Drivers’ License Restoration Project led by the North Carolina Pro Bono Resource Center and assisted several clients with their driver’s license restoration.
<i>Immigration</i>	Volunteers from the Charlotte office worked on Special Immigrant Juvenile Status (SIJS) cases with CCLA, representing children who have been abused, abandoned, or neglected by their parents and are seeking a pathway to lawful permanent residence and citizenship.
<i>Triage</i>	The Charlotte office of Wells Fargo, in partnership with law firms, companies, and legal services organizations including Bank of

	<p>America**, Duke Energy**, Husqvarna Group, McGuireWoods*, Moore & Van Allen, CCLA, and Legal Aid of North Carolina, developed the Charlotte Triage project, a collaborative program across the Charlotte legal community to expand the reach of legal services to all.</p> <p>Charlotte, NC is grappling with economic mobility challenges and an especially vulnerable homeless population despite being one of the most prominent hubs of the U.S. financial services industry. To respond to this challenge, the Charlotte Triage program raises awareness of the unmet legal needs in the community and drives intentional pro bono volunteerism within the Charlotte community with a focus on critical legal needs like housing, health benefits, criminal expunctions, and human trafficking. Since its inception, Charlotte Triage has now trained more than 400 volunteers and helped deliver legal services in more than 390 matters.</p>
<p>Lessons Learned</p>	
<p><i>Coordinate effectively.</i></p>	<p>With over one thousand Legal Department employees spanning over a dozen cities, there is no one-size-fits-all model for our pro bono work. The Pro Bono Program has effectively federated responsibilities to Local Coordinators in each city, who are charged with leading pro bono work in whatever way best serves their local community. This has resulted in opportunities looking different and being run differently in different places. Each city has found its own niche, and this model has been far easier to manage than having a single person or group run pro bono for the entire Department.</p>
<p><i>Identify project leaders.</i></p>	<p>The Pro Bono Program regularly receives new ideas and pitches for pro bono projects. The most successful projects have been the ones where someone, whether a Local Coordinator or another team member, has stepped up to lead the efforts and followed through with all coordination aspects. Having a go-to person who is in-charge creates accountability, investment, and streamlined execution.</p>
<p><i>Align pro bono opportunities with Community Relations.</i></p>	<p>The CR team has focused in recent years on signature themes of housing affordability, financial literacy, and small business/entrepreneurial activities. The Pro Bono Steering Committee has partnered with CR leaders to find pro bono projects in these thematic areas, such as representation and pre-litigation dispute resolution in landlord/tenant cases, and advising small businesses and nonprofits. By doing so, the pro bono team has cultivated deeper relationships with other volunteerism and community service leaders in the company, and in some instances, leveraged these relationships for charitable contribution purposes. These internal partnerships also provide enhanced visibility to the Pro Bono Program by senior</p>

	leaders across the company who may not otherwise frequently engage with the Legal Department.
<i>Engage with partners across the pro bono community.</i>	Be proactive about learning from peers, and resist the urge to go it alone. The Program has benefited greatly from its partners, including law firms' ability to provide CLE pro bono trainings; legal services agencies' ability to connect volunteers with clients and projects; and peers in the corporate legal department community, who have been an ongoing source of meaningful advice and feedback. The Pro Bono Institute (PBI) programming also has been invaluable in cultivating these relationships. The Program would not be at its present level of maturity without the input and support of all the CPBO partners and stakeholders whom the team first met during the PBI Annual Conference.
<i>Offer a variety of pro bono projects.</i>	The Program has been thoughtful about offering different types of pro bono opportunities, ranging in time commitment, cause, and type of legal work. The Program recognized that certain attorneys were more interested in transactional opportunities, rather than litigation matters, so the Program developed new projects in that space, such as researching human trafficking laws to prepare a compendium. Similarly, certain volunteers are drawn to short-term commitments, whereas others are able to take on projects with a longer time frame. The Program strives to have a variety of pro bono opportunities to appeal to all volunteers.
<i>(Prepare to) take risks.</i>	Program leaders will be approached by a variety of stakeholders with pro bono partnership opportunities. It can be inspiring -- and overwhelming, too. The Pro Bono Steering Committee may develop some programs and opportunities that have the potential to be transformational for the Program and the company's local communities. However, sometimes projects do not work out as anticipated and volunteers might be irritated by making time for an opportunity that does not materialize. The Pro Bono Program leadership should prepare to take risks, deal with these outcomes, and hold itself accountable. Recognize that not taking risks may inhibit program growth.

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