

FMCRC Opposes SunTrust-BB&T Merger

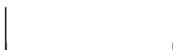
(letter to Federal Reserve Board below)

FMCRC Chair Al Pina Calls Merger:

The Racial Economic Wall

FMCRC Call On Federal Reserve Board to hold public hearing in Washington D.C. on SunTrust-BBT Merger

SunTrust Bank-BB&T Have History of Racial Economic Exclusion
Overview of Mega Merger That Impacts Millions of Minorities:



Florida Minority Community Reinvestment Coalition
Assets & Hope (www.assetsandhope.org)

February 11, 2019

Federal Reserve System
Honorable Lael Brainard
Board of Governors
20th & C Street NW
Washington, DC 20551

Copy:

Office of the Comptroller of the Currency
Mr. Joseph Otting
Comptroller
400 7th St SW
Washington DC 20219

Honorable Maxine Water
Chair, House Financial Services Committee
Congresswoman, 43 District (CA)
2221 Rayburn House Office Building
Washington D.C. 20515

RE: FMCRC Opposition to SunTrust-BB&T Merger: Request for Public Hearing in Washington D.C. by Federal Reserve Board and Congressional Financial Services Committee on SunTrust-BB&T Bank Merger. Require Historic CRA (Community Reinvestment Act) Commitment for Approval of Merger That Will Focus on Access to Capital for Minority Families and Businesses
(DELIVERED BOTH VIA EMAIL AND CERTIFIED MAIL)

Honorable Governor Lael Brainard:

First off I wish to thank you again for taking time out of your very busy schedule to meet with myself and leaders of the Baltimore African American community to discuss the fast growing racial wealth gap that harms our country's economic future. We at FMCRC and organizations we work with are requesting that a public hearing be held in Washington D.C by both the Federal Reserve Board and the Congressional House Financial Services Committee in regard to the proposed SunTrust-BB&T Bank merger that can and will negatively impact millions of minorities across the United States.

I was scheduled to retire this year but the racism that is gripping our country the past 2 years has led me to put back on my economic civil rights hat to fight these racist (in both public and private sectors) to the gates of hell and back and I do so for our beloved country's future. This SunTrust-BB&T merger has special meaning for me in that I started my economic civil right advocacy in Florida with a 16 day hunger strike against SunTrust Bank for their refusal to make a CRA commitment for minority families and small businesses. I got word from an insider that a SunTrust official was heard saying "let him die so what". SunTrust bank officials attempted to smear my name and reputation with false accusations and articles but that would not stop me. If not for the intervention of some of Federal Reserve Board Chair Alan Greenspan associates, I surely would have died of the hunger strike. FMCRC and SunTrust came to CRA terms but not until my body incurred permanent damage.

This SunTrust hunger strike was necessary for several reasons. When I first arrived to Florida, I head a state wide minority community meeting and also invited the banks. Both SunTrust and Bank of America CRA officials who attended that meeting told me that they were not happy with me focusing on minority issues and demanded that I stop. This was the environment in Florida. Complete white dominance over all aspects of minority economic issues and opportunities. My

hunger strike was to send these all white bankers a message that we will fight them with all that God has given us to bring economic inclusion for minorities. But my SunTrust hunger strike was also mean to send a message to minorities in Florida and elsewhere-to bring about racial economic inclusion we must stand up against economic racism with all the God has given us, even if that means non-violently putting your life on the line.

In that I have seen much progress towards racial economic inclusion since that bank hunger strike, without a doubt, I have seen racial economic regression the past four years and especially the past 2 years. The widening racial wealth gap clearly shows this. There is a furious white racist tide sweeping our country that we have not witnessed for decades. As America's color shifts from white to multi-color, this has fueled and condoned white racism that truly harms our country's economic future. Minorities will one day be the majority in every major city in our country and these white racist cannot stop this tide. One only look at California as an example of this tide. We minorities are the future economic soldiers of the United States of America. It is up to us minorities to ensure that we continue to be the economic global super power. But we will not be able to do so if this growing racial economic gap is allowed to grow and prosper that in turn fuels this white racism that is now embracing our country from Washington D.C. to every corner of our beloved country.

So you see Ms. Brainard, this SunTrust-BB&T merger is much more than just another bank merger. It is a symbol of either racial economic inclusion or racial economic exclusion. Both of these banks are old southern banks that are symbols of a past that embraced racial economic exclusion. Today these white racist are using "the wall" as a symbol for those who cling to this past of white dominance and to fuel these white Americans to fight to keep this past alive. So as "the wall" is their symbol, this SunTrust-BB&T bank merger is now a symbol of either racial economic inclusion or racial economic exclusion in the United States of America.

The first step towards building racial bridges in America will be to hold a public hearing on this proposed merger and to hold this hearing in the heart of our democracy-Washington D.C. Secondly, to place historic economic race relevant CRA commitments by SunTrust-BB&T that will include, but not limited to, affordable housing lending to LMI families, affordable housing lending and investments for non-profit affordable housing developers, small business lending (and equity investment) goals for minority and women owned businesses, racial and gender inclusion at the top executive levels, major investments into LMI communities and specific programs that will address the rising racial wealth gap. Allow these historic CRA commitments to be a wake-up call for all banks.

These CRA commitments MUST be focused on capital and not grants. The following excerpt from the actual CRA legislation clearly shows that banks must provide capital to our communities:

The Community Reinvestment Act (CRA) is a federal law that requires banks to meet the credit needs of their entire communities, including low-moderate income (LMI) neighborhoods. The CRA Act begins by reciting to Congress three findings. First, financial institutions are required to serve the "convenience and needs" of the communities in which they are chartered to do business. Second, "the convenience and needs of the communities include credit services." Third, financial institutions have "continuing and affirmative obligation(s) to help meet the credit needs of the local communities in which they are chartered."

Both SunTrust and BB&T have failed miserably in this access to capital legislation for minorities. On a side note, in that most of SunTrust & BB&T have ignored our community economically, I would like to commend one SunTrust executive who has shown a willingness to at least listen. I have been attacked the past 3 years SunTrust bankers, one even mocking me for using the word "GOD". Peter

Mahoney of SunTrust did not listen to them and he alone was responsible for putting on the first ever Baltimore African American CRA community meeting. But Mr. Mahoney is the exception at both SunTrust and BB&T.

Allow this public hearing on this merger to be a tool for all bank regulators so they can truly hear the voices of our communities crying for capital and racial economic inclusion.

In closing, I AM BACK as a racial economic civil rights advocate. And only God will have influence on my actions. For what I do is for both community and country. And I have a message to those who wish to attack me or my economic civil rights advocacy in days to come: I will fight you to the gates of hell and back and I will surely be victorious over you. For my fight is both just and righteous.

We at FMCRC thank you for your consideration on this request. If any questions, please contact myself directly at (813) 598-6361.

Sincerely,

**"There are those who say thus is the way of the world....I say NO thus we make it"
"It is easy to sing when one sits upon a perch of privilege as compared to those who are drowning in a sea of neglect"**

Al Pina
Chair/CEO
FMCRC & Assets & Hope
Cell 813-598-6361
www.assetsandhope.org www.fmcrc.org
FAITH-HONOR-STRENGTH

_____Previous FMCRC E-Newsletters_____



Martin Luther King Quote After Visiting The Berlin Wall in 1964

*"For here on either side of the wall
are
God's children and no man-made
Barrier
can obliterate that fact"*

**Martin Luther King
September 13, 1964**

Editorial

Al Pina, Chair FMCRC & Assets and Hope (pina@fmcrc.org)

(www.assetsandhope.org www.fmcrc.org)

The following is an editorial and does not represent the position of FMCRC.

The Great White Wall of America:

**A Symbol of Racism & Bigotry For 35% of America
Who Fear the Browning of America**

Make No Mistake About “The Wall”:

This is NOT about National or Border Security; it is about giving white racist a symbol of White Elitism. As America becomes more brown (and minority), White elitist feel threatened. The Republican Party Who Gave Our Country Abraham Lincoln That Abolished Slavery Now Wish To Give Us The Great White Wall of America That Will Serve As a Symbol of Racism & Bigotry to White Racist/Elitist Americans who fear the browning of America



Shame on You Republicans and President Trump

The Great White Wall of America:



Let's Make America Racially Divided Again

Make no mistake that sheep herders (leaders) are using this Great White Wall of America as a tool to generate votes. Make no mistake about this Great White Wall....it is nothing more than a symbol to those (mostly white and less than 35% of Whites) who cling to a dying past where white Anglo-Saxons ruled this land we call America. From the days of slavery, those whose skins were shades darker were relegated to the edges of American society and economic opportunity. For over 200 years, our beloved country has evolved to become a symbol of hope, compassion and equality. But it has been a long hard road where hundreds of thousands upon thousands of Americans have died (including the Civil War) to bring increased freedom and economic opportunity for all our families of color in our beloved country the United States of America. I for one WILL NEVER bring shame upon those who have given their lives to allow me increased equality and freedom. I will honor them by fighting to the gates of hell and back those who wish to take our country back to a land of white elitism where black and brown were not allowed to drink or eat in the same seats as whites.

Make no mistake that this Great White Wall of America symbol harms our nation even more so today in that with this growing tide we call a global economy, it is about survival of the fittest countries economically that will determine who will be the Alpha Nation in the coming future. Since the beginning of human civilization, every single dominant nation or tribe has fallen because they cling onto outdated notions. They fell because they are not able to continually unite the various tribes or sectors of their society. They fell because they created sectorial partitions of race or economic stature. They fell because they lost their soul.

The United States of America is not immune from a fall of grace as the world's dominant

Alpha Nation. This Great White Wall of America will be the very symbol that begins the slide towards American being nothing more than a footnote in the history of the world hundreds of years from now. This Great White Wall of America will be used as emotional fuel to those who cling to a dying white male dominated American past that will then encourage them to hate those who are different from them. But far worse, this increased racism & bigotry will be taught to millions of innocent children who will then carry forward this gene of hate upon their children.

Life has taught me this and this for sure; people are either sheep or the sheep herders. Since the beginning of mankind when we lived in caves, there were those who wished to lead their tribes and those who did not wish for that responsibility and wished to follow. To put in simplistic terms, lets call them sheep and sheep herders. As any real life sheep herder they are responsible for keeping the sheep safe, fed and sheltered. Leaders (sheep herders) are no different. These leaders are responsible for keeping members of their tribe (community, family, company, organization, neighborhood etc...). This Great Wall of America is nothing more than a symbol by the White Sheep herders to their white sheep that THE WALL will become their first step towards days past of White control and elitism in our country. The vast white Americans do not cling to this past or desire it....but that approximately 35% of White America feel this deep in their heart. Any Latino who lived in California for past 20 years witnessed this first hand when White Californians feared the browning of California. The infamous California Proposition 187 (anti Latino bill) was born from this and the White Sheep herders used Prop 187 as a symbol for their sheep as those today who are using the Great White Wall of America as their symbol. This is not about national security...it is about the fearing of the browning of America. But let me assure you it will not stop at Mexicans or South Americans...history such as in Germany who used Jews as their symbol of hate shows us this.

I for one want this nation, this great nation to prosper and spread its wings as eagles and soar as a symbol of grace, pride, fellowship, hope, strength and love. But if we allow this Great White Wall to become a symbol of racial division, then we gained THE WALL but lost our soul as a nation in doing so. Let us reject this symbol they call The Wall and see it for what is truly is: The Great White Wall of America that harms our countries future

It is time for us to rise as eagles and confront this rising tide
of racism, sexism and bigotry...
defeat the Great White Wall of America Symbol
No Money For Any Wall

Previous E-Newsletters Sent Out:

**Fifth Third Bank Provides Equity Capital To FMCRC For
Build Out of Tampa New Single Family Homes For:**

FMCRC Rental Home Ownership Program

Developing LMI Home Ownership Without Any Government Funds

(DETAILS OF PROGRAM BELOW)

Fifth Third Bank Uses Innovation towards affordable home ownership by developing a new equity/EQ2 financial investment product for nonprofits to use to buildout affordable housing that provides for increased equity and income streams for nonprofit that leads to both financial sustainability and self-sufficiency for the nonprofit.

The affordable housing crisis is driven by a significant lack of for sale (or rental) affordable housing inventory that drives up both affordable housing for sale prices and rental rates. The lack of affordable housing inventory is driven by the lack of affordable housing developers. The lack of affordable housing developers is driven by the lack of equity in housing developer balance sheets that does not allow them to acquire adequate construction debt capital that will produce increased levels of affordable housing inventory. Fifth Third Bank is the first bank in Florida (or the country) to develop an equity investment product for affordable housing developers. FMCRC applauds Fifth Third Bank for their innovation and leadership. FMCRC calls on ALL regional and national banks to follow the lead of Fifth Third Bank and provide equity/EQ2 financial products for affordable housing developers that can lead to major increases in affordable housing.



Market Opportunity: **A New Affordable Rental/Home Ownership Model That Produces FMCRC Profit and LMI Home Ownership-Using EQ2/Equity (Mezzanine or Similar Capital Products) for targeted Ground Up/Rebuilt Affordable Rentals in Middle/Upper Income Census Tracts to train and prepare LMI Families for Home Ownership**

Affordable Rental/Home Ownership Model Overview:

- 1) Provide high quality primarily new construction affordable housing to LMI families in primarily middle to upper income neighborhoods at reduced rental rates (some up to 35% reduction on market rental comps)
- 2) Produce an affordable rental housing product that provides FMCRC increased balance sheet equity and cash flow that provides adequate financial security for bank equity investment that does not utilize any government funding. Produce an affordable rental housing model that can provide a viable road to home ownership for LMI families.

The goal is to target mostly single family properties (both ground up and rehab) that are either in middle/upper income census tracts or properties in economically growing moderate income census tracts that are in growing high demand areas that will ensure increases in home values and equity. Once the homes are built/rebuilt place an LMI family into these rental units at reduced market rental rates and provide a home ownership training program to the family that will enable them to be pre-qualified for a home loan within 24 months.

FMCRC Affordable Housing Rental/Home Ownership Program Overview:

Property Goal: Using FMCRC and Bank Equity Investment, build out of 25-30 single family/townhome rental homes in targeted middle to upper income areas of Pinellas/Hillsborough counties that has the greatest opportunity for increasing property values for the built out home and to provide LMI families opportunity to live in a nicer neighborhood with better schools and job opportunities. This property strategy also provides a housing model that protects FMCRC from a housing downturn

Home Ownership Goal: Over 5 years, assist 150 LMI families towards home ownership by providing them 2 year lease in built out homes and with below market rental rates in exchange for participation in program that will result in them being pre-qualified for a home loan within the 24 months. After the rental family becomes pre-qualified for a home loan, FMCRC will work with this family to locate a home (or lot) to acquire for buildout.

The Rental Home Ownership program will focus on providing 150 LMI families (over 5 year period) below market single family rentals while preparing them for home ownership during a 2 year lease time period. Each LMI family selected will reside in the built out home (avg 1600 sq ft-3 bedroom/2 bath) with a rental rate at below market rental rates.

The selected family will agree to a maximum of a 2 year lease and to participate in the following:

- 1) Work with an approved main street bank to develop a banking relationship that will include working with the banker on their credit score and how to improve it
- 2) Working with the main street bank for savings/checking where they also will get their home loan (we must help these families learn how to do business with main street banks and not these small home mortgage lenders who are not regulated and accountable to regulatory oversight and are financially harming these LMI families)
- 3) Financial literacy training from an approved provider
- 4) Surprise visits to their homes for inspections to ensure the homes are being well maintained. They must learn to always protect their asset (the home when they buy one) by keeping it clean (exterior/interior) and well maintained that will impact the value of their home once they are a home owner

Every 6 months, the chosen bank/banker will conduct a mortgage pre-qualifying analysis on the family to assess what amount of home loan do they qualify for. Once they qualify for an amount that will allow the family to purchase a home in the area and at the price they can afford, they will work with the FMCRC to locate a home they can qualify for.

Previous E-Newsletters:

Photos Below of Children With Cancer At FMCRC Beach Sanctuary

Photo Below of Low Income Family At New Home In High Income Neighborhood of Tampa

FMCRC Chair Al Pina:

Use Economics To Battle Racism

During this very troubling time in our nation where we see increased and fast rising racism, sexism and a growing gap between low-moderate income families and the wealthy, we at FMCRC have rebuilt our affordable housing model that places target placing low-moderate income families into high income neighborhoods (As the photo below demonstrates) at reduced rents and then we will train them over 24 months to become pre-qualified

to purchase their own homes. **Zip Code is your Future** with better schools and job opportunities.

We must stop placing low income families into low income neighborhoods that places economic shackles on them. This hurts our nations economy and future. We do our housing without one penny of government funding and operate as a housing company who produces profit and takes that profit to assist low-moderate income families and children with cancer. We donated 3 homes to 3 low income families in 2018. You will find photos below of some children from the Children's Cancer Center of Tampa enjoying the Beach Sanctuary we built for them to find peace. We use debt from Regions, PNC, TD, Fifth Third and Capital One, and housing properties from NCST/FannieMae that allows us to produce for sale/rental affordable housing. I am pleased to announce a major 2019 housing initiative where we will take debt and bank equity to increase our affordable rental housing (new and rebuilt single family homes) by 500% that will show you can increase minority low-moderate income home ownership and provide affordable rentals in nice middle and upper income neighborhoods without any government funding while still producing profit for your programs. We hope this model can be replicated in other parts of our great county so we can battle racism with economics.

**FMCRRC Chair Al Pina
Welcomes Low Income Family To Live
In FMCRRC Housing In Exclusive High Income
Community**

**K-BAR RANCH OF TAMPA
(NEW TAMPA)**



**FMCRC CHAIR AL PINA
WELCOMES MICHAEL AND HIS FAMILY
TO THE FMCRC BEACH SANTUARY**

Michael has finished chemo-therapy and
went into shock and almost died.
The beach sanctuary is not only for children to find
peace but for the parents also who suffer greatly
as their dear beloved childreb battles for life

FMCRC Chair Al Pina And Michael



TAMPA TEENAGER WITH CANCER

(and going through chemo-therapy)
**FINDS PEACE WITH FAMILY
AT FMCRC BEACH SANTURY**



**Teen Ager With Cancer Enjoy Sunset With Her Sister
At The FMCRC Beach Sanctuary:**



CHILDREN WITH CANCER BEACH SANCTUARY READY FOR CHILDREN

In spite of some construction issues in the rebuilding of this beach sanctuary (we will still have to come back and shut down the condo to address the construction errors at a later date but condo can be occupied), we are opening the Beach Sanctuary for children with cancer and their families to find some peace and love. FMCRC is working with Tampa based cancer organization to identify these children and their families so they can stay in this beach condo and find some peace during these very difficult times. Many of these children will have terminal cancer and we hope that they can find some peace, joy and love in this beach sanctuary that will leave loving memories for the family once their child has left to be with God. Below you will find some photos of this beach sanctuary that we feel will allow them to find some peace during their stay:





Prior E-Newsletters:

Federal Reserve Board Governor Lael Brainard Issues
Press Release on Racial Inclusion & CRA Modernization
(PRESS RELEASE BELOW)

Federal Reserve Board Governor
Honorable Ms. Lael Brainard
Meets With Baltimore African
American
Leaders April 17, 2018 **(PHOTOS BELOW):**

PROMOTES (DETAILS IN PRESS RELEASE BELOW):

RACIAL INCLUSION IN BANKING

**RACIAL INCLUSION WITH ACCESS TO
CAPITAL**

**RACIAL WEALTH GAP STUDIES TO AID IN
DEVELOPMENT
OF DISTRESSED MINORITY COMMUNITIES**

**NEED FOR CRA MODERNIZATION THAT IS
LOCAL,
INCLUSIVE AND COMPREHENSIVE TO FOSTER
ECONOMIC GROWTH OF LOW MODERATE
INCOME AREAS**

FMCRC CHAIR AL PINA STATEMENT:

We applaud Governor Brainard and her positions on
racial inclusion

and the need to modernize CRA (Community
Reinvestment Act)

It was an honor to be part of a very important and
critical

Baltimore African American Community meeting with
Federal Reserve Board Governor Lael Brainard and

key Federal
Reserve Bank of Richmond executives to discuss the
rising Racial

Wealth Gap in Baltimore that harms our entire
economy and threatens
the future of our beloved country in the global
economy. Studies show
that minorities represent over 45% of all major urban
cities, yet they
contribute less than 5% of those cities GDP (gross
domestic product).

This issue is not about color...it is about the national
security of
our country. Future wars will not be with conventional
militaries but
economic in nature. When minorities represent less
than 5% of our
GDP, and will be a majority minority in the largest
states in less than
15 years, this clearly shows that minorities are not
producing or consuming
enough to positively impact our economy globally.

The need for racial
economic inclusion is in the best interest of our country
if we expect to
remain the top global economic power. This is a fact.

The remarks
by Governor Brainard on racial inclusion and CRA

modernization is
absolutely correct. But more importantly, she took
time out of her so
busy schedule to meet with African American leaders
in Baltimore...

this sends a clear message: **African Americans and
minorities matter**

Thank you Governor Brainard

PRESS RELEASE

FEDERAL RESERVE BOARD

GOVERNOR LAEL BRAINARD:

April 17, 2018

Community Development in Baltimore and A Few Observations on Community Reinvestment Act Modernization

Governor Lael Brainard

At the Federal Reserve Bank of Richmond Baltimore Community Development Gathering, Baltimore,
Maryland

Good afternoon everyone. I want to take a moment to thank you for giving us such great insights into all the important work that is taking place here in the neighborhoods of Baltimore.¹ Every few months, I try to get out to some of the areas of the country where our Reserve Banks are engaged with community members, community development institutions, businesses, banks, and schools in efforts to create more vibrant communities. I last had the pleasure of visiting Baltimore with community development staff from the Richmond Federal Reserve Bank in 2015. Each visit teaches me so much more about the complexity of the challenges you face, the creativity of the solutions you devise, and ultimately the determination you all demonstrate to lift up the lives of all community members in this city. Collectively, as community development professionals, concerned residents, and community partners, I can see the considerable progress you are making in the neighborhoods of Baltimore, although of course there is still plenty of work to be done.

We, at the Federal Reserve Board and the Federal Reserve Bank of Richmond, recognize the unique challenges Baltimore faces, and we are committed to remaining focused on this city and to partnering where that can be helpful. Baltimore and its residents deserve a more prosperous and equitable future. I am pleased that the Federal Reserve's Community Development team has been supporting your work and helping to convene collaborative endeavors, such as the Symposium on Workforce Transportation that occurred in February, and cross-state learning exchanges that connect community development leaders from Maryland and the Carolinas.

Perhaps the work that best exemplifies our commitment to understanding the complex dynamics of this city is the Federal Reserve Bank of Richmond's Persistent Poverty Study. The goal of this research initiative is to further understand the barriers and incentives that individuals living in persistent poverty face in making economic decisions. This multiyear qualitative research project will interview households in the Baltimore metro area to better understand how individuals have been able to overcome intergenerational poverty. I will be very interested in what we will all learn from this work.

I would also like to highlight that the Reinventing our Communities conference will be held here in Baltimore from October 1st through 3rd. This is an excellent conference that draws on resources from across the Federal Reserve System, along with Johns Hopkins University, to highlight effective models and emerging strategies for investing capital to foster economic growth by enabling every individual to contribute to and derive benefit from the economy.

The Federal Reserve System has a valuable perspective because we are in communities all across this nation and because as a supervisor we engage with banks as they seek to fulfill their affirmative obligations to meet the credit needs of their communities. I have seen the value of the Community Reinvestment Act (CRA) as a vital tool to address the credit needs of low- and moderate-income communities, and I believe the time is ripe for a refresh to make it even more relevant to today's challenges. As you may know, the Treasury Department recently completed an extensive outreach effort related to modernizing the CRA regulations. We look forward to working with the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation, with which we have traditionally issued joint rulemakings on CRA.

The Federal Reserve is deeply committed to the Community Reinvestment Act's goal of encouraging banks to meet their affirmative obligation to serve their entire community, and in particular the credit needs of low- and moderate-income communities. As we have seen all over the country, when banks are inclusive in their lending, it helps low- and moderate-income communities to thrive by providing opportunities for community members to buy and improve their homes and to start and expand small businesses. We employ an extraordinary group of CRA examiners and community development professionals to make sure that we do our part to help banks meet this obligation, as the statute directs. We are very proud of the role we play in educating banks on the CRA's provisions, introducing them to potential partners in the community, and keeping them informed of best practices in the field. In fact, one of CRA's important achievements has been to help foster the growth of the community development field by building stronger relationships between financial institutions and community and economic development professionals. This development has expanded the number and range of opportunities for banks to lend and invest in safe and sound ways, benefiting both banks and their communities.

The current CRA regulations date back to 1995. In the two decades since, there have been substantial changes in the ways that banks serve their customers and in the challenges faced by low- and moderate-income communities. The time is ripe to modernize the CRA regulations to make them more effective in making credit available in low- and moderate-income areas at a time when technological and structural changes in the banking industry allow banks to serve customers outside of the areas with branches that have traditionally defined a bank's community. As we update the rules, it should be possible to achieve better outcomes--both providing banks with the greater clarity and predictability they seek while also facilitating better provision of credit, investments, and banking services in low- and moderate-income areas. There are several outcomes that we will work toward in the interagency rule-writing effort.

First, we should seek to modernize the definition of assessment areas in such a way that the core focus remains the credit needs of local communities. The definition in the existing CRA regulation of a bank's assessment area--that is, the area in which we evaluate a bank's CRA performance--reflects a banking environment when interstate banking was not yet allowed, and physical branches were necessary to serve the deposit and lending needs of bank customers. Technological advances and changing consumer preferences have made it possible for banks to serve customers far outside of their physical branches--for example, online and on mobile devices. Clearly, it is time to find a way to expand the area in which the agencies evaluate a bank's CRA activities. At the same time, it is

important to retain a focus on place--and in particular the credit needs of local communities. We are confident that there are ways to expand the area where we evaluate a bank's CRA performance without losing the regulation's focus on the unique role banks play in meeting local credit needs and providing services that are only possible by using branches. Treasury's recommendation that the agencies revisit the regulations to allow CRA consideration for a bank's activities in its assessment area, as currently delineated around branches and deposit-taking automated teller machines, as well as in low- and moderate-income areas outside that branch footprint, is a reasonable place to start our interagency discussions.

Second, banks should be encouraged to seek opportunities in areas that are underserved. Currently, a bank's performance in its major markets is evaluated most closely and weighs most heavily in its CRA rating. This emphasis has resulted in what banks and community organizations refer to as credit "hot spots" where there is a high density of banks relative to investment opportunities. Meanwhile, other areas have a difficult time attracting capital because they are not in a bank's major market, if they are served by a bank at all. Key priorities in any new set of regulations are to eliminate such market distortions and to avoid creating new ones. No matter how we define a bank's assessment area in the future, new regulations need to be designed and implemented in a way that encourages banks to spread their community investment activities across the areas they serve.

Third, revised regulations should be tailored, recognizing that banks vary widely in size and business strategy and serve communities with widely varying needs. Banks seek clearer, simpler rules that result in more CRA activity with less burden. We believe this can be done while retaining the flexibility to evaluate a bank's CRA performance in light of its size, business strategy, capacity, and constraints as well as its community's demographics, economic conditions, and credit needs and opportunities. We should not adopt a set of evaluation criteria that would be appropriate for large banks and assume that smaller community banks would be able to meet them without substantial additional burden. We should also be sensitive to the ways in which a bank's business strategy, no matter its size, influences the types of activities it undertakes to meet its CRA obligations. Regulatory revisions that do not contemplate evaluating CRA performance in context risk undermining CRA's greatest attribute--its recognition that banks are uniquely situated to be responsive to the most impactful community and economic development needs in communities.

Fourth, we should seek greater consistency in examinations and ratings across the agencies as well as within each agency. Clarity about the activities that qualify for CRA consideration, the area in which those activities will be considered, and the type of demographic and economic information examiners evaluate will go a long way toward promoting consistency. In addition to regulatory revisions, however, the agencies can promote consistency in other, non-regulatory ways. For example, we can improve the way in which examiners present their analysis in written performance evaluations and provide more opportunities for interagency examiner training.

Fifth and finally, revised regulations should support CRA's position as one of several mutually reinforcing laws designed to promote an inclusive financial services industry. As banks seek to meet the credit needs of their entire community, it is important to ensure against discriminatory or unfair and deceptive lending practices.

In the months ahead, I look forward to receiving input from the many stakeholders about the path forward on modernizing CRA regulations. I want to express my commitment to supporting the goals of CRA as we revise the regulations to better align them with current banking practices.

I

n closing, I want to express my appreciation to you for inviting me to join you today. I am very impressed with the important ways different kinds of organizations represented in this room are working in partnership to promote economic development here in your community.

1. I am grateful to Amanda Roberts and Theresa Stark of the Federal Reserve Board for their assistance in preparing this text. The remarks represent my own views, which do not necessarily represent those of the Federal Reserve Board.

Last Update: April 17, 2018

Photos of Federal Reserve Board Governor Lael Brainard,
Federal Reserve Bank of Richmond Executives
Baltimore African American Community Leaders:



Photo (Seated):

**Al Pina: Chair, Florida Minority Community Reinvestment Coalition
Co-Founder/Advisor, Baltimore African American Home Builders
Cooperative**

Federal Reserve Board Governor Lael Brainard

**Diane Bell-Mcroy: CEO, Associated Black Charities of MD
Co-Founder-Baltimore African American Home Builders
Cooperative**



**FMCRC Assets & Hope Building Beach Sanctuary
For Children with Cancer**

**FMCRC To Work With Tampa Bay Children With Cancer
Focused Nonprofit To Identify Families To Stay At Beach
Sanctuary**



Beach Front Retreat To Allow Low Moderate Income Families
With A Child That Has Cancer To Feel The Healing Power of Gods
Beauty As They Watch The Sunsets in the Gulf of Mexico



FMCRC Chair Al Pina (pina@fmcrc.org):

Every child who comes upon this earth is born of pure mind and soul. It is adults who corrupt this world and hence corrupt these beautiful minds and souls of children. It is adults and our corruptive actions that fuel cancer. My journey to fully understand this began when I was hospitalized and placed in a cancer ward.

As Terrible the things I do to others...none of it matches what I do to myself:

The corruptive ways of adults goes far beyond just impacting the mind and soul; it also impacts the body in ways we are just now discovering. Quantum Physics, the study of energy, has allowed us to peer into the wonders and complexity of energy. Each body on this planet is nothing more than energy encased within a physical casing (our body). Quantum Physics has allowed us to now see that all energy is connected. It is my deep belief that cancer is not only born out of a mutation of cells, but that this negative energy that is produced by corruption is fuel for these cancerous cells. It is now that traditional medicine is finally embracing Quantum Physics that I hope one day will allow us to fully understand that our actions and thoughts have consequences not only upon ourselves but also upon this planet.

My first encounter with a child with cancer would forever change my life:

The beginning of my health issue began years ago when doctors

discovered the lining of my esophagus showing signs of metastasizing. I needed major surgery to stop this from growing worse. I ordered the doctor and surgeon to not tell my family what was really wrong with me and only that I needed surgery. I hid this from the world so they would not see me as weak or sick. After a 3 hour surgery I was then placed in the cancer ward for recovery and rehab. Until this point of my life all I cared about was money and success. I could barely walk but the first time I attempted to walk in the cancer ward would change my life. As I walked along the ward corridor step by step, I passed a room to my left and I saw a mother and father holding the hand of a young boy who lay in bed. For some reason I stopped and watched them. It was evident this young boy was sick but what I also witnessed just as agonizing was the pain and agony on the faces of that mother and father. Their pain so deep that I could feel it from the doorway of that hospital room. They saw me and I gave them a smile and moved on. As I passed the nurses station I asked a nurse what sickness that young boy was suffering from. She told me that he had cancer on the spine. The image of that beautiful boy and his parents over him pierced my memory and thoughts. Seeing a sick child with cancer hit me hard and made my condition seem so trivial. That night I cried thinking about both the sick boy but also the pain I saw on the faces of his parents. It was at that very moment that I saw my drive of money and success was a cancer in itself and for some reason my corruptive ways had a hand in both m cancer and that young boy.

From that point on I have worked to become a better man who

battles those who corrupt this world that fuels cancer of the body, mind and soul. I have learned this very fact on this journey: [Every action of an adult either contributes to the destruction of mankind or to the construction of humanity that brings heaven to earth.](#) I am compelled by God to battle to the gates of hell and back those who choose destruction of mankind. To fight for that young boy I saw and think of to this day.

It is our hope that this beach sanctuary can bring moments of peace and hope for the sick children but also the parents who suffer daily as their beloved child suffers. We hope you can feel the beauty of God as you peer upon the ocean and understand that God is love. God loves all and judges not. And we hope that during this time you can but for a brief moment escape this harsh world and find peace together as a family.

God Bless These Families With Sick Children Who Suffer Daily

EDITORIAL

FMCRC Chair Al Pina:

**White Poverty Pimp Feeds On African Americans in
City of St. Petersburg Florida**

**City of St Pete CRA District
82% African American**

**Poverty Pimp-
Mike Sutton
President-
Habitat for Humanity of Pinellas County**

FMCRC Chair Al Pina Challenges Mike Sutton To Midtown Public
Debate On Plight of African Americans in City of St Pete

FMCRC Chair Al Pina Challenges Mike Sutton To Join Him and Live in
Low Income Motel in St Pete African American Community for One
Week Since He Does Not Know African American Community Yet
Profits From Them

City of St. Petersburg Promotes White Poverty Pimps Upon The African
American Community Through Rules That Disqualify 100% of all
African American Led & Focused Nonprofits in St. Petersburg from
Building Homes in Their Own Community

Annual Salary & Benefits:

Al Pina: \$29,500

Mike Sutton: \$162,000 (estimate)

First off, God Bless anyone who serves the poor or those who have no

voice regardless of color. But when minorities are not allowed to build or rebuild their own community and when there are no African American led and focused nonprofits who builds housing in a mostly African American community in the City of St. Petersburg this is pure economic racism. When African Americans led and focused nonprofits are not allowed to rebuild and build up their own community of St. Petersburg, they are robbed of the jobs, intellectual bandwidth, profit, policy influence and building up of their own financial capacity to access construction capital that comes with being a prominent affordable housing developer in their own community. But what we have in the City of St. Petersburg are "white poverty pimps" who do not live in the very communities they build and do not have any desire to defend publicly the issues of the African American community of St. Pete. They come in and rob the African American community of all the benefits of building affordable housing. The king of poverty pimps in the City of St. Petersburg is Habitat for Humanity of Pinellas County led by Mike Sutton. This organization and leader is the primary affordable housing builder in mostly African American neighborhoods in the City of St. Petersburg, yet like a coward and poverty pimp, Mike Sutton (President of Habitat for Humanity of Pinellas County) is no where to be found publicly defending the very African American community he builds in on serious social and economic issues that plague this community. Mike Sutton and Habitat for Humanity can build in the African American community and steal the profits and all the benefits that come with home building yet he will not defend the African American community. To the African American community of St. Pete: when have you seen Mike Sutton and Habitat for Humanity publicly defend your community on fight for you? Never....because Mike Sutton and Habitat for Humanity do not live in your community and have no desire to truly understand your community. The City of St. Pete fuels this economic apartheid. A recent example is a program to build out NSP lots that they will provide up to 67% of the capital to build new homes in the African American community but the qualifications eliminate 100% of all local African American led and focused nonprofits. But Habitat for Humanity of Pinellas County is set up to be the primary builder of these homes. To the African American community of St. Pete...the time is now to defend your community from all outside poverty pimps like Mike Sutton and Habitat for Humanity and demand that your own organizations be allowed to build up your own community. There are dozens of local African American organizations who wish to build up your community.

In doing so, these organizations will build up financial and intellectual capacity (and influence on social policies that come with success) that can truly lead to economic inclusion in the City of St. Petersburg that does not exist today.

The time is now to become **MASTERS OF YOUR OWN DESTINY** and not passengers in your own car that exists today. The time is now to **DEMAND** that your own community become builders of your own community. The time is now to tell organizations such as Habitat for Humanity of Pinellas County that they are **GUESTS** in your community and if they refuse to defend your community publicly then they are no longer welcomed in your community. The time is now to **UNITE** and take control of your communities economic future and become masters of the economics of your community, that includes becoming the primary builder of affordable housing in your community.

Lastly to Mike Sutton, I challenge you to a public debate in Midtown in front of the African American community. Let us debate on the issues of the African American community. I will gladly show this community you have no idea or desire to know the African American community. Secondly, Mr. Sutton, I challenge you to join me and live for a week in a rent by the week motel located in the African American community you build in. FMCRC will pay all costs for this. You are willing to build in this community and take all the benefits that come with that out of this community so it is time you live in it and learn about the hearts and souls of this beloved community.

This Habitat of Humanity of Pinellas County issue is the tip of the iceberg in most major cities in the United States. Minorities are not allowed to be the builders of their own community. This is harmful to our counties future and the time is now to change this. We must become builders of community & country

Al Pina, Chair FMCRC

A Race War in America Grows

Time to Unite Black & Brown
To Battle This Growing Evil
Call for National Black-Brown Summit

We call on all Latino & African American national organizations, Latino & Black Congressional Caucuses, every State Latino & Black legislative Caucuses and Every Latino & African American organization to come together in a Washington D.C. **Black-Brown Summit to battle the growing race war that threatens our communities' future**

FMCRC Chair Al Pina Editorial (pina@fmcrc.org):

Make no mistake about what has come upon on the African American & Latino's doorstep, a race war not seen since the days of Martin Luther King. There is now an evil growing that is fueling a race war this is causing a great racial divide in America. This harms America's future in the growing global economy. We are calling on all national African American & Latino organizations and leaders to **UNITE US AS ONE**. Allow those in Washington D.C. and across our nation that are fueling this race war that we will not sit by idly and allow them to harm our loved ones future. Allow these evil ones to hear our **BLACK & BROWN ROAR**. Allow them to hear from our **BLACK & BROWN UNITY** that we will battle you to the gates of hell and back before we allow you to treat us as second-class citizens. Allow them to hear from our **BLACK & BROWN UNITY** that we will use every non-violent ounce of energy we have to ensure that the very mantra of our constitution that "every man/woman is created equal" lives and thrives in America. Allow our **BLACK & BROWN UNITY** to serve as a symbol of hope for every black and brown child in our nation and to teach them that to have democracy you must fight for democracy with all that God has given you. We must teach every black and brown child in America that they have a responsibility for generations of black and brown children not yet born to ensure they have inherited an America that is moving towards true racial equality. We must teach every black and brown child in America that elections have consequences and if you choose to sit on the sidelines they will get the race war that is now upon us.

Unite Us at a **BLACK & BROWN SUMMIT**

We call on all national Black & Brown leaders to organize the **BLACK & BROWN SUMMIT** in Washington D.C. that will allow us to **UNITE AS ONE**. We need you to lead us....**Unite Us, Unite Us, Unite Us****and allow our roar of black and brown unity to be heard from the coast of California to the shores of Maine.**

Al Pina, Chair FMCRC & Assets & Hope (www.assetsandhope.org)

Oscar Wilde Book De Profundis quote:

“Terrible as was the world did to me, what I did to myself was far more terrible still”

EDITORIAL:

United States Senator John McCain Helps Us
Racially Integrate Phoenix AZ in 90s

Aids in Getting City Council to Vote For
Cesar Chavez Plaza in heart of Downtown Phoenix

Present Day: Senator McCain Saves Millions of Lives By
Saving Healthcare for the Poor

**My Story of U.S. Senator John McCain On
Helping Us Bring Racial & Economic Integration To
Phoenix in the 90s That Builds Up Our Nation’s Ability to Compete**

FMCRC Chair Al Pina:

Senator McCain continues to be an American I admire and trust. I started in the 90s in Phoenix Arizona. As a point, I am a registered Independent. I don’t embrace a political party, I embrace the United States of America. Before I personally met Senator McCain, I heard of him through a commander I worked for in the United States Air Force who like Senator McCain, was a prisoner of war at the infamous Hanoi Hilton during the Vietnam War.

After the death of Cesar Chavez, a hero to most Mexicans and

Mexican Americans, I saw an opportunity to not only honor our hero, but to bring racial integration to Phoenix that had a history of racial segregation during the 90s and before. You see, I believed then as I believe now....that America will never be able to compete and lead in the growing global economy if we did not have a racially and economically inclusive nation that would allow minorities become significant contributors to the economy (both in productivity and consumption). I saw this in the United States Air Force and military that was significantly racially integrated that allowed people of all races work together to protect our nation. From Generals to privates, minorities have helped our military become the single most powerful military in the world. We can do the same with our economy if we bring both racial and economic integration to all major cities. Remember, every single world dominating power has fallen in the history of the world. If we do not bring full racial economic inclusion into our nation we are at risk to a global economy.

So it begins with racial social integration. To start this in Phoenix, I wanted to erect a monument and plaza in the heart of Phoenix Arizona named after Cesar Chavez. During the 90s this was controversial so it would not be an easy task. Little did I know our greatest obstacle would be 2 Latino democrat elected officials who ran politics like a mafia. I put forth the idea of having a plaza named after Cesar Chavez with several Young Turk activists like myself (back then we were young). They all agreed that we would pursue this opportunity to bring racial integration to Phoenix.

We met with one of the 2 Latino democrat elected officials who was a city councilmember to get his support for this monument. I attended the meeting with a mentor (Art Othon) who used to be the chief of staff for Democratic Governor Bruce Babbitt. In short the meeting got ugly. The city council member and the husband of the second Latino political mobster told me it was none of my business and I better do what they want. Anyone who knows me.....there is nobody on this planet that can intimidate me. I answer to God only. So I lashed back at them and told them they kiss my rear and I would move forward with it anyway. Because what we wanted was good for our city and country.

But I knew little about politics and learned soon it could be very sneaky. We were able to get on the Phoenix city council agenda a vote to erect a plaza across the street from City hall named the "Cesar Chavez Plaza". We packed full the city council chambers and I was sure we would get the votes to make this a reality. Oh how I was wrong. I was asked to speak on behalf of the agenda item of erecting the "Cesar Chavez Plaza". I spoke on the need to bring racial inclusion to Phoenix and to have symbols like the "Cesar Chavez Plaza" to bring such racial inclusion that builds up our nation. I asked packed city council chamber audience do they support this measure...the chamber erupted with applause and yes. I was certain we would win the vote and the City of Phoenix would see the beginning of symbolic racial integration. So Mayor Paul Johnson asked for a vote...the Latino city council member (to this day I refuse to say his name) spoke and said he would not support this measure. And the mostly other

republican council members were following him. The mostly all white council did not want a Cesar Chavez plaza in downtown and used this Latino council member to do their dirty work. I saw a defeat coming and I wanted to cry....but a "GREAT" American and the only African American on the city council (and highly respected Calvin Goode) spoke and stated how let's vote on this agenda item now because there we many more questions that needed to be answered. The Mayor agreed and they tabled the agenda item to name the park in the heart of the city the "Cesar Chavez Plaza". It was certainly going to be defeated so I was pleased to have it tabled.

After the city council voted to have the agenda item tabled something happened that would change my life forever. Council member Calvin Goode called me over to speak to me. He told me to learn how politics are played and that the Latino council member had gotten the votes to defeat our Cesar Chavez Plaza before this meeting and I better learn how to play this game to get this approved because he thought it was the right thing to do. He suggested I go to one of the 2 Republican Arizona U.S. Senators to persuade the Republican city council members to vote yes. Right away I thought of Senator John McCain who I heard of so much from my Commander.

I asked my mentor Art Othon (remember a past Chief of Staff for a Democratic AZ Governor) if he knew Senator McCain and could he get us an audience. He said yes and we would have to fly to D.C. to meet with him. Soon after we flew to Washington D.C. to meet Unites States Senator John McCain and discuss the "Cesar

Chavez Plaza” in Phoenix and how that would be good for Phoenix, Arizona and America. But I must admit I was just as excited to meet a hero to most Veterans like myself. We all know of this great American and I was also blessed to have worked for a fellow prison of war who taught me humility.

This was my first trip to Washington D.C. and it was so overwhelming to me. My heart pounding out of my chest we came to Senator John McCain’s office and were escorted into a private office. As we waited for Senator McCain my heart was pounding so hard I thought I would faint. Then I heard the door opening and walked in this American and I was immediately in awe of his presence. Immediately my military service took over and I called him “Sir” but he told me no need to call him “Sir” so I called him Senator McCain. Knowing his schedule was tight we went right into the purpose of the meeting. First off I was so proud to see a Democrat and Republican talk together about building a stronger Arizona and country. After we presented our case, Senator McCain told us what we wanted with this “Cesar Chavez Plaza” in the heart of Phoenix was the “right thing to do” and he would make phone calls to help our efforts. As quick as that. The meeting only lasted about 20 minutes but it was one of the best 20 minutes of my life. For I witnessed Americans on different sides of the political aisle agree that racial and economic integration was good for America.

Soon after that meeting I was called and told the agenda item to name the small park in the middle of the city the “Cesar Chavez Plaza” was back on the agenda to be voted on. Wow....is all I

could think. The City Council voted to approve the building of the “Cesar Chavez Plaza” and the road to racial integration truly began in Phoenix.

Months later, I was called by Art Othon that there was going to be a formal ribbon cutting for the “Cesar Chavez Plaza” and I would not be invited. That the very Latino Democrats who opposed us to erect the “Cesar Chavez Plaza” in the heart of the city were taking control of this ribbon cutting and made sure I was not invited. He asked me if I was angry because I was the person who made this happen and yet I was not invited. I chuckled...and told him I was not upset because what we did was not for credit or fame...we did this because I understand how racial integration is critical for our country’s future. That matters not credit. But I also know most people would not ever know that Senator John McCain made this possible and for this I will always be grateful to Senator McCain.

On a side note...remember Council member Calvin Goode who saved the “Cesar Chavez Plaza” from initial defeat...well God rewarded him for his righteousness. After his death the main city of Phoenix building right next to the “Cesar Chavez Plaza” was named the Calvin Goode Building. Now in the heart of the city...2 symbols (Cesar Chavez Plaza and Calvin Goode Building) for Latino and African American children that tells them “they belong and they are important to our country”. This feeling that they belong and important to the United States of America gives them hope and will give them emotional and spiritual fuel to work hard and help us all build a nation that will be the world leader for all

times.

We start with racial integration that must lead to economic inclusion to ensure our nation's survival forever. Unites States Senator John McCain showed me back then during this Cesar Chavez Plaza struggle and last week voting to ensure the poor have health insurance (that the ability to not suffer is not an American privilege) that he is a great American and will always be my hero. God Bless you Senator (or Sir) McCain.

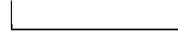
So to those who are upset that I focus on Race I hope this story helps you understand that what we must focus on race to racially and economically integrate America and by doing so we will ensure that the United States of America does not follow the path of every leading civilization in the history of the world and fall. A Brookings Institute study found that minorities in every major urban city account for 43% of those cities population yet contribute on average less than 5% of those cities GDP. By focusing on race we will bring racial and economic inclusion to America. By doing so America will remain the leading super power forever by having minorities become greater contributors to our economic fabric and stability.

Al Pina, Chair FMCRC

Tampa, FL 33606

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Eike, Kathy

Internal Board-routing markings only



Dear Mr. Powell,

Witnessing the negative effects of particular corporate mergers in my home state of North Carolina, I must express with all due respect that the announced merger between BB&T and SunTrust banks make absolutely no sense to so many here. Please hear me out Sir.

I have friends that work for BB&T. Realistically, they're unable to uproot their families and move two hours away. Having kids in school as well as aging parents depending on their proximity, the prospect of moving is just overwhelming. One mentioned that they'd sell their house and move in with their parents first. Please understand that the Triad area of NC is not a "metropolis" and related corporate jobs are limited.

I believe that a profound quote applies here, especially when considering the following:

- ? BB&T reported Fourth-quarter profit of \$754 million
- ? SunTrust reported fourth-quarter profit of \$710 million

That quote: "Power tends to corrupt and absolute power corrupts absolutely." It's my humble opinion that some industries, especially banking, have become just too powerful as a result of seemingly obsessive M&A activity.

Elizabeth Warren recently revealed a particular statistic around banking M&A approvals by your organization. That approval rate is shocking to the average citizen! Is there any understanding of the devastating fallout of these mergers?

When is enough enough?

Thank you so much for considering my thoughts.

Respectfully,
Mark Brydges

Due Date: 03/22/2019

Lead Division: N/A

Status: Assigned to Coordinator

Cox, Wayne

From: Bernard Fudim <bernardfudim@gmail.com>
Sent: Saturday, March 16, 2019 3:39 PM
To: Cox, Wayne
Subject: [External] Opposition from a senior citizen to the merger of BBT and SunTrust

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PLEASE NOTE: This email is not from a Federal Reserve address.
Do not click on suspicious links. Do not give out personal or bank information to unknown senders.

I think of the SunTrust bank branch within my neighborhood as a friendly bank with personnel who desire to make the procedure of banking, and who promotes the assistance to senior citizens who wish to pay their bills using the SunTrust website and the internet.

I have witnessed the ongoing confusion especially for seniors of advanced age when Scottrade was merged within Ameritrade. I am afraid that the same episodes involving a lessening of personal support will be a result of the propose merger between BB&T and SunTrust. These proposed mergers are never helpful to the individual user. They furthermore create complications due to changes in sign on procedures, that are difficult for senior citizens to navigate. no one seems to consider these ramifications.

Bernard Fudim

Home adress



Cox, Wayne

From: Bernard Fudim <bernardfudim@gmail.com>
Sent: Saturday, March 16, 2019 3:53 PM
To: Cox, Wayne
Subject: [External] Sun Trust merger

NONCONFIDENTIAL // EXTERNAL

PLEASE NOTE: This email is not from a Federal Reserve address.
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Further to my previous email concerning the effect of changes upon banking procedures forced upon senior citizens. The usual response is to say that BB&T will issue instructions on how to navigate these changes. They will do so without realizing that changes in appearance and procedures, are in itself an impediment to senior citizens. No doubt programmers will believe they have conquered such difficulties, however they are incapable of thinking as a non programmer let alone as a senior citizen. Even program managers have difficulty understanding older programs and have to hire experts in the older programs.

Eike, Kathy

From: Walter Waddell <waddell01@comcast.net>
Sent: Friday, March 15, 2019 9:58 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Subject: [External] 190315LMT2149 The Ordinary Customer

Follow Up Flag: Follow up
Flag Status: Flagged

NONCONFIDENTIAL // EXTERNAL

PLEASE NOTE: This email is not from a Federal Reserve address.
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Dear Whomever,

I fear for the administrative integrity of my account that could be compromised or record keeping and sorted mangled; specifically, I receive my income electronically by way of automatic deposits (Bank routing number; account number). Current banking procedures and policies (to make money for themselves) make it difficult, inconvenient, and personally financially dangerous to switch to different bank products but still retain your original Bank routing number and account number. Would you address this insignificant issue for us - the little people?

Once assigned an account number it remains regardless of which product the customer wants to apply for.

Very Respectfully,

W.R.(Ray) Waddell

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MEMO

From: Kenneth H. Thomas, Ph.D.

To: FDIC Chair Jelena McWilliams via dbarr@fdic.gov
Federal Reserve Board Chair Jerome Powell via david.w.skidmore@federalreserve.gov
House Financial Services Committee Chair Maxine Waters via Twaun.Samuel@mail.house.gov
Fed merger comments @ comments.applications@rich.frb.org
FDIC merger comments @ BankerMergerApplication@fdic.gov

Date: March 18, 2019

Re: First Convenience and Needs Comment Recommending *Approval* of Proposed BB&T/SunTrust
Merger Conditioned Upon the Federal Reserve Being the Primary Federal Regulator

Please consider this my first formal Convenience and Needs comment recommending *approval* of the proposed BB&T/SunTrust merger *conditioned* upon the Federal Reserve being the primary federal regulator of the resultant bank. Both of these banks have offices near me, although I do not have any personal or business relationships with either bank.

I have commented on most major bank merger in the U.S. since the 1990s, and, rather than protests or challenges, every one of them have been comments recommending approval conditioned upon a convenience and needs issue consistent with good public policy.

That is once again the case with this current merger where I am recommending conditional approval. The primary case supporting this conditional argument is found in the February 13, 2019 *American Banker* BankThink article titled "Fed, not FDIC, should regulate a merged BB&T-SunTrust."

While the two merging banks have billed this as a "merger of equals," it is anything but that for their primary federal bank regulators, namely the FDIC for BB&T and the Fed for SunTrust.

American banks, unlike banks or regulated companies elsewhere, have the luxury of choosing their own primary federal regulator. Importantly, they can switch them if desired to find the "friendliest" regulator, often referred to as "competition in laxity."

As in every law or regulation, however, there must be exceptions to allowing a bank this luxury to choose their own federal regulator when the public interest is potentially adversely impacted as would be the case here in terms of the convenience and needs of the communities to be served by the resultant bank.

Why the FDIC Won the “Competition in Laxity” Decision by the Resultant BB&T/SunTrust Bank

Having followed both banks for decades, I was not at all surprised to see that the resultant bank chose the FDIC as their primary federal regulator, and I believe it was for the following reasons:

1. BB&T, the decision maker in this deal, with greater assets, market value and 57% ownership of the new bank, is comfortable with their existing FDIC primary federal regulator.
2. BB&T is by far the largest bank regulated by the FDIC, but this is not the case with SunTrust and the Fed. Using the Comptroller’s reference to regulated banks as the Office of the Comptroller of the Currency’s (OCC) “customers,” it is harder to say NO to your far and away largest customer, whether you are a regulator, bank or any business. Of the 30 banks with assets over \$100 billion, the \$216 billion BB&T is one of only two state-chartered Fed nonmember banks whose primary federal regulator is the FDIC, the other one being the \$104 billion Discover Bank. Of the remaining 28 banks, 19, including the very largest, have the OCC as their primary federal regulator and nine, including SunTrust, have the Fed.
3. The FDIC demonstrated that it was friendlier than the Fed when it (and North Carolina’s state regulator) terminated BB&T’s joint anti-money laundering order dated December 20, 2016, on June 29, 2018 but the Fed still has not terminated that order.
4. Most importantly, based on my detailed CRA research, the FDIC has displayed a continued pattern and practice of favoritism toward BB&T on the industry’s most subjective regulation, namely CRA. The two most blatant cases of regulatory favoritism involved BB&T’s 2009 acquisition of the failed Colonial Bank in Alabama and BB&T’s most recent CRA exam.

FDIC Favoritism With BB&T’s Colonial Bank Acquisition

BB&T’s biggest and most important deal prior to SunTrust was the purchase of the failed Colonial Bank in Alabama from the FDIC. That was the deal that gave BB&T its critical foothold in the Southeast, especially the nation’s most rapidly growing big state, my home state of Florida. The FDIC did not make public in a timely fashion material data about BB&T’s fair lending and CRA performance, which could have scuttled the deal.

BB&T was downgraded from an outstanding rating in 2004 to satisfactory in 2008 because of a serious fair lending violation, namely a “pattern or practice of discrimination on the basis of race” in violation of the Equal Credit Opportunity Act and the Fair Housing Act.

For some unknown reason, which I can only ascribe to favoritism, the FDIC conveniently withheld public notification of the downgrade and finding of serious racial discrimination until September 2010, well after the FDIC accepted BB&T’s winning bid for Colonial Bank in August 2009.

In contrast to this unprecedented 31-month delay, nearly three years, the FDIC released BB&T’s two previous CRA exams in 2004 and 2001 just *eight* months after they were completed, and the two previous exams were released within *four* and *five* months. The FDIC has never explained why their release of that BB&T’s 2008 exam with serious racial discrimination issues took roughly FOUR to EIGHT times longer than the previous ones?

Had the FDIC disclosed this material information in a timely manner consistent with previous exams of that bank and other banks, the predictable outcry from community groups, Congress and the general public could have scuttled BB&T's bid on the failed Alabama bank or inhibited the FDIC's ability to accept that bid.

In that case, Colonial would have gone to the runner-up, TD Bank, which had put forth a fairly close bid. There is no doubt in my mind that BB&T would not be the bank it is today or the bank that it will be after this proposed merger *without* the Colonial Bank purchase. I documented this argument to the regulators in a 2012 when BB&T bought BankAtlantic, one of Florida's largest thrifts, but it was readily dismissed.

FDIC Favoritism With BB&T's Most Recent CRA Exam

In an unusual case of déjà vu all over again, BB&T's most recent CRA Performance Evaluation (PE) released on May Day 2018 resulted in an outstanding rating, despite the fact that they were once again found to have engaged in a "substantive violation of Regulation B, which implements the Equal Credit Opportunity Act."

The problem this time was not a friendly delay in the FDIC's release of the rating but rather an outright inflated rating. Having read thousands of CRA PEs since 1990, when I coined the term "CRA Grade Inflation" in my first book on CRA, I concluded that the FDIC inflated BB&T's current CRA rating from a satisfactory to an outstanding one for the following reasons:

1. The above- cited fair lending violation in the exam should have resulted in a one-rating downgrade as was the case in BB&T's 2008 exam and most other FDIC exams, consistent with FDIC examination procedures. However, in an apparent accommodation to its largest "customer," the FDIC stated that "a downgrade of the CRA rating to less than Outstanding was not warranted" based on the Bank's "CRA performance, extent and impact of the finding, and immediate corrective actions taken." I believe this was an unprecedented act of favoritism.
2. BB&T received a "high satisfactory" rating on the 50% weighted Lending Test and outstanding ratings on the 25% weighted Investment and Service Tests. Many banks receiving such a "50-50" ratings mix from the FDIC receive an overall satisfactory rather than outstanding rating, because of the importance of the Lending Test, especially when there is a serious fair lending violation.
3. BB&T received an inflated outstanding rating on the Investment Test, since qualified investments during the Review Period amounted to only 0.7% of total assets, which is below the 1% outstanding benchmark in The CRA Handbook and below the comparable percentage of many other banks receiving Outstanding ratings from the FDIC.
4. BB&T received an inflated outstanding rating on the Service Test, since their cited 5,728 Community Development Services is about 2,000 services below the outstanding benchmark based on my detailed CRA research summarized in my recent CRA reform comment.

Had the FDIC made the proper downgrade, BB&T would still be a satisfactory rated bank, like 90% of all banks, and this would most likely not be an obstacle to the SunTrust merger. However, we expect our biggest banks, especially those engaged in major M&A deals, to have outstanding ratings and certainly not have any substantive Reg B violations.

BB&T is Too Big To Regulate for the FDIC

I previously argued that BB&T was Too Big To Regulate (TBTR) for the FDIC based on regulatory favoritism on the Colonial Bank deal. This was similar to a much earlier argument I made that the now defunct Washington Mutual (WAMU) was TBTR for the now defunct Office of Thrift Supervision, and that is when I first coined the TBTR phrase.

Please note that TBTR is different from the “Too Big To Manage” complaint lodged against Wells Fargo in the recent House Financial Services Committee hearing involving that bank, since “manage” implies management’s efforts in running a bank versus a regulator’s efforts to oversee a bank to insure it is acting in the public interest.

If BB&T was TBTR when I made that argument in 2015, their roughly doubling of size and the FDIC’s continued regulatory favoritism as documented above makes this argument even stronger.

The FDIC is primarily a regulator of small banks, whereas the OCC and the Fed have much more experience in overseeing very large banks. Under the supervision of the Fed, BB&T would just be another large bank brick in the Fed’s regulatory wall rather than the dominant one under the FDIC.

Summary: Merger Approval Must Be Conditioned on the Federal Reserve Being the Primary Federal Regulator for the Resultant Bank

Good public policy dictates that the resultant bank from the BB&T and SunTrust merger *must have the Fed as their primary federal bank regulator.*

The continued lobbying and other efforts by the applicant banks, their lawyers and consultants, and even by a conflicted FDIC itself to allow it to be the resultant bank’s primary federal regulator must be ignored to protect the public interest.

Our banking system is unique in the world for many reasons, including this luxury for our banks to choose among multiple federal regulators. I am not suggesting we remove this perk, but I do believe when there is such repeated and documented regulatory favoritism by one federal bank regulator toward one bank, their biggest by far as is the case here, that we must make an exception in the public interest.

Therefore, *I recommend this merger be approved but only under the condition that the Federal Reserve be the primary federal regulator of the resultant bank.* Otherwise, this proposed merger will NOT be meeting the required Convenience and Needs factor for approval and will certainly NOT be in the public interest.

Eike, Kathy

From: Drimer, Adam
Sent: Monday, March 25, 2019 2:28 PM
To: Eike, Kathy
Subject: FW: [External] Re: Automatic reply: Opposition from a member of the general public to the merger of Sun Trust with the BBT banking system

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From: Bernard Fudim <bernardfudim@gmail.com>
Sent: Sunday, March 17, 2019 7:28 AM
To: Drimer, Adam <adam.drimer@rich.frb.org>
Subject: [External] Re: Automatic reply: Opposition from a member of the general public to the merger of Sun Trust with the BBT banking system

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<p>PLEASE NOTE: This email is not from a Federal Reserve address. Do not click on suspicious links. Do not give out personal or bank information to unknown senders.</p>

I think of the SunTrust bank branch within my neighborhood as a friendly bank with personnel who desire to make the procedure of banking, and who promotes the assistance to senior citizens who wish to pay their bills using the SunTrust website and the internet.

I have witnessed the ongoing confusion especially for seniors of advanced age when Scottrade was merged within Ameritrade. I am afraid that the same episodes involving a lessening of personal support will be a result of the propose merger between BB&T and SunTrust. These proposed mergers are never helpful to the individual user.

There is a social infrastructure, that develops between a bank and its customers and it promotes the harmonic a relationship between the two. That harmonies relationship increases over time and particularly as one becomes aged and becomes a senior citizen. Social infrastructure and its development promotes the harmonic relations between Bank and depositors. A developed social infrastructure in its turn influences the investment climate within regions

Social infrastructures and its inter-industry characteristics when studied by economists as well as sociologists, and psychologists, have been shown to work advantageously.

Modern conditions of development and of social infrastructure such as ageing and senior citizen problems can be defined in my opinion as the conditions for economic destabilization. Bank mergers must consider their affect upon the development of social infrastructures.

Internal Board-routing markings only



Eike, Kathy

From: Gary Cain <GCain@bgccf.org>
Sent: Tuesday, March 26, 2019 9:38 AM
To: RICH BankSup Applications Comments
Subject: [External] SunTrust/BB&T merger

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PLEASE NOTE: This email is not from a Federal Reserve address.

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I wanted to share with you that SunTrust has been very involved in our community in terms of philanthropy and in terms of providing talent for nonprofit boards and for providing leadership on community initiatives. We have benefitted from both talent and philanthropy, and it is my belief that SunTrust has this as a part of their business model. They understand that if the community they live and work in isn't doing well, it is likely that their business will not do well. SunTrust is actively involved in Lift Orlando which is modeled after the promise community in Atlanta. We plan to build an \$8.5 mil Boys & Girls Club on a school campus as a part of providing safe places for children in non-school hours. Our programs focus on academic success, healthy lifestyles and good character and leadership. SunTrust leaders have been actively engaged in this project as well as our new club build to strengthen our community. Please do not hesitate letting me know if you have questions or need additional information.

Gary W. Cain
President & CEO
Boys & Girls Clubs of Central Florida
Syd & Marianne Levy Service Center
101 E. Colonial Drive, Orlando, FL 32801
O: 407.841.6855 | C: 407.595.4323-



March 21, 2019

SunTrust Bank, Inc.
1445 New York Avenue, NW
Washington, DC 20005
Attn: Muriel Garr, Senior Vice President Community Development Manager for SunTrust Bank
Re: SunTrust BB&T Merger / Muriel Garr, Senior Vice President SunTrust Bank

Dear SunTrust,

The purpose of this letter serves to recognize the impact Muriel Garr has made on our programs as the Senior Vice President Community Development Manager for SunTrust Bank. Ms. Garr, SunTrust Bank and the SunTrust Foundation have been unwavering advocates for the scores of underprivileged children we mentor in our STEM the 100 Way Education Initiative, leading to positive outcomes and brighter futures for the hundreds of low-income children residing in the most challenged neighborhoods of the District of Columbia.

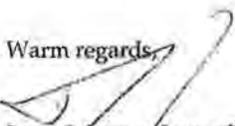
Please note that during the last three years we have introduced high school students to coding, RC cars, biomedical engineering and forensic science. Additionally, trained staff augmented their math, English Language Arts, algebra and geometry skills during Saturday sessions. As a consequence of these efforts, grades and performance on the PARCC standardized exams measurably increased for the majority of participants, a group that included a high concentration of students who entered the 9th grade reading on a 4th and 5th grade reading level.

Our efforts included an annual field trip to the Army Educational Outreach Program (AEOP) for a "My Brother's Keeper" Day at the Labs event at the Walter Reed Army Institute of Research. Ms. Garr's support was responsible for a full day of interactive lessons and activities with experts in emerging infectious diseases, engineering and biochemistry. Moreover, we have taken our mentees to the National Science Festival, the 100 Black Men national conference in Florida, entered students in a financial literacy contest and placed first in a RC Car competition at the NSBE conference in Pittsburgh.

The 100 Black Men of Greater Washington, D.C. has since been named Non-Profit of the year by the D.C. Chamber of Commerce and received the Jim Vance Community Service Award from our host high school. One could make the case that these accomplishments would not have materialized without the steadfast support of Muriel Garr, SunTrust Bank and the SunTrust Foundation.

We look forward to maintaining a mutually beneficial relationship with the merged SunTrust/BB&T entity and affecting the lives of those striving to improve their circumstances. Should you have any questions regarding this matter, please do not hesitate to contact me at (202) 507-6340.

Warm regards,


Ivory Johnson, Immediate Past President
100 Black Men of Greater Washington, DC
CC: Federal Reserve Bank of Richmond,
P.O. Box 27622, Richmond, VA 23261



March 27, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

To Whom It May Concern:

It gives me great pleasure to write a letter of support for SunTrust Bank as it intends to merge with BB & T. I can attest to the fact that SunTrust is an active member of the Memphis community and Promise Academy specifically.

Promise Academy has used SunTrust for all its banking needs since the school's inception in 2005. During that time we have relied on SunTrust to support our efforts as we began operations with one kindergarten class of sixty students in a converted church classroom building to now operating two elementary schools with over 800 elementary students. Over the years we have needed SunTrust to extend credit to purchase technology equipment or update our facility. We have partnered with them to provide purchasing cards for our staff so they can easily buy supplies, materials and attend out of state professional development activities. When one of the school's credit cards was hacked, SunTrust called us to make us aware of the issue and quickly resolved the problem. We have been approached numerous times by other banking institutions to obtain our business, but we have remained with SunTrust for all the above reasons - reliability, customer responsiveness and ease of service.

In addition, members of the SunTrust banking community visited Promise Academy Spring Hill in the fall and shared finance related activities with our third graders. The students enjoyed their time and learned a great deal from the experience. Finally, Mr. Johnny Moore, President and CEO of SunTrust is an active and participating member of our Board of Directors. He joined the Board after we had developed a relationship with SunTrust and has been an invaluable member providing his expertise and insight as we operate Promise Academy. As Executive Director, I can rely on Mr. Moore for honest comments and helpful suggestions.

I fully support opportunity for both financial institutions and am available for any further questions or concerns.

Sincerely,

Thomas A. Beazley
Executive Director

Eike, Kathy

From: Sarah Williams <sarah.williams@unboundrva.org>
Sent: Wednesday, March 27, 2019 9:16 AM
To: RICH BankSup Applications Comments
Subject: [External] Comments in support of the SunTrust and BB&T merger

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Support of the communities they serve is a hallmark of SunTrust and BB&T.

UnBoundRVA is a Richmond, Virginia based non profit that serves talented individuals from low income communities with a path to entrepreneurship.

The richness of our community requires support of those less fortunate providing financial education and support to allow our communities to thrive.

The culture and the financial support from SunTrust and BB&T makes that happen in Richmond, Virginia.

We support the merger and their great work to give back.

Sarah Williams



2920 W Broad Street, Suite 224
Richmond, Virginia 23230



March 27, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

To Whom it May Concern:

Please accept this letter of support for the merger of SunTrust and BB&T. Both companies have been significant supporters of community nonprofit organizations and initiatives that help improve the quality of life in our community.

SunTrust employees contribute over \$163,000 to our annual United Way campaign and the corporation has also provided support of \$130,000.

BB&T and SunTrust employees are active on local boards and are active volunteers with our organization. The SunTrust CEO for our region, Scott Pohlman, is also an active member of our Board of Directors.

We are truly grateful for all of the ways SunTrust and its employees contribute to the quality of life in the metropolitan Nashville community.

Please feel free to contact me if I can be of service in any way.

Sincerely,

Brian Hassett
President and CEO



Eike, Kathy

From: Tom Sittema <tom.sittema@riverbridgecapital.com>
Sent: Wednesday, March 27, 2019 4:51 PM
To: RICH BankSup Applications Comments; bankmergerapplication@fdic.gov
Subject: [External] SunTrust/BB&T Merger

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To whom it may concern:

This letter is in support of the merger of these two fine banking institutions.

My name is Tom Sittema and I lead a boutique investment firm named RiverBridge Capital. I am also very involved in the local community in Orlando having served as president or chairman of numerous local community and civic organizations including the Economic Development Commission, the United Way Campaign, Florida Citrus Sports, and Lift Orlando. In those leadership capacities, I interact with a significant number of business and community leaders across our region on a recurring basis.

My support for this merger is largely based on the huge commitment SunTrust in particular has exhibited in this community. Their foundation has prioritized financial well-being and they have made enormous commitments of time, energy, and financial resources to the greater good of this community. They can always be counted on to not only provide financial commitments but also, and more importantly, important leadership for critical regional priorities.

In my opinion, they are the model banking organization for community and philanthropic leadership and support in all of Central Florida. I believe this merger will allow them a more significant and financially stable platform to not only continue these efforts but meaningfully increase them for the greater common good of the communities in which they serve.

I wholeheartedly support this merger and encourage your support as well. I am available should any questions arise. My number and contact information is below.

Thanks for your consideration.

Thomas K. Sittema
Managing Partner
RiverBridge Capital LLC

704-905-6994
tom.sittema@riverbridgecapital.com

March 27th, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

FDIC's Atlanta Regional Office
10 10th Street, NW, Suite 800
Atlanta, GA 30309-3849

To Whom It May Concern:

SunTrust has been a valued partner of the Boys & Girls Clubs of Greater Memphis for over 15 years. Through their monetary donations as well as employee involvement, SunTrust has affected thousands of at-risk Memphis youth.

Since 2004, SunTrust has been the presenting sponsor of BGCM's annual Tennis Invitational, which helps raise over \$180,000 annually for the programs and services provided to our Club members. With SunTrust's support, the event just recently in 2018 celebrated its 20th Anniversary and has been recognized by the USTA as one of the best amateur tennis events in the state. The invitational also provides our Club members the opportunity to learn more about tennis. For many of the youth we serve, tennis is a sport that is not prevalent in their communities and without the event a sport they may otherwise never have the opportunity to participate in.

In addition to SunTrust's sponsorship many of their employees donate to the Boys & Girls Clubs of Greater Memphis via United Way as well as volunteer their time and talents. Giving in such a way enriches the lives of our Club members who rarely have adults in their life that act as superior role models or provide them with the encouragement to pursue goals such as a college education. Johnny Moore, SunTrust President & CEO for the Memphis region, has been a member of our Central Board of Directors since 2013, where he has been a leader in the growth and strategic planning of the organization.

Most recently, SunTrust has invested in our Technical Training Center where we focus on workforce development for youth ages 16-21. Through their support, students learn the skills and training they will need to enter the workforce that will make them employees of choice.

We greatly value our partnership and the impact that SunTrust has made in our community and look forward to continuing to impact lives in the future.

Sincerely,



Keith Blanchard
President & CEO
Boys & Girls Clubs of Greater Memphis



BOYS & GIRLS CLUBS
OF GREATER MEMPHIS

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44 South Rembert
Memphis, TN 38104
(901) 278-2947
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www.bgcm.org

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Anne Wulff, Chair
Mike Keeney, Chair-Elect &
Secretary
Tammy LoCascio, Treasurer

Central Board of Directors:
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Roy Bell, III.
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David P. Sorsby
Phillip Stevenson
Paulo L. Teixeira*
Gregory Wilson

*denotes past Board Chair



John Dustin
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1100 Voltintine
(901) 527-7994

Porter Goodwill
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1037 Cummings Street
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Bernal E. Smith Sr.
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4299 Ross Road
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Sycamore View
Club
1910 Sycamore View
(901) 388-2087

Oakhaven
Club
3900 Tchulahoma
(901) 249-5724

Juice Plus + Technical
Training Center
903 Walker Ave.
(901) 774-3074

Camp Phoenix
Sardis Lake
(662) 526-5970

Eike, Kathy

From: Gray Videnka <gray.videnka@gimi.org>
Sent: Thursday, March 28, 2019 9:18 AM
To: RICH BankSup Applications Comments
Subject: [External] Suntrust Community Work Comments

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Good Morning,

In response to the request for comments regarding Suntrust's investment in our communities, here is what I would say: "Suntrust has been a valued partner of Goodwill Manasota for years. Most recently, Suntrust funded a grant to create an app that increases the financial literacy of the thousands of people we serve. We are grateful for the partnership shared between our two organizations and look forward to the future of creating greater community impact." – Gray Videnka, VP Foundation Goodwill Manasota

Gray

Gray Videnka
Vice President, Foundation

Goodwill Manasota

2705 51st Ave East
Bradenton, FL 34203
Work: 941.355.2721 ext. 251
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WWW.EXPERIENCEGOODWILL.ORG



CHANGING LIVES THROUGH THE POWER OF WORK



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THE HUB
West Virginia
Community Development Hub

Charleston Office
424A Shrewsbury St
Charleston, WV 25301

Grafton Office
109 E Washington St
Grafton, WV 26354

304-533-1077

www.wvhub.org

March 20 2019

Mr. Tom Barkin
President and CEO
Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

Letter of expression regarding the anticipated impacts of the pending merger of BB&T with SunTrust Bank

Good day:

We write to you today on behalf of West Virginia communities that are currently served by Branch Banking & Trust Company (BB&T) and will be impacted by the pending merger between BB&T and SunTrust Banks, Inc. This letter includes 13 agencies and organizations that provide alternate lending and support services to drive economic, business, and community development in West Virginia communities.

From our vantage point as residents, lenders and technical assistance providers to rural West Virginia communities, we are aware of the significant impacts that this pending merger is likely to have on banking services in our state. As the merger progresses, we seek to share our concerns, propose actions that could be taken to mitigate these impacts, ensure that adequate and necessary services continue to be provided, and urge you to take into account the critical role of banking services to rural communities throughout our state of West Virginia.

The critical role of bank services and investments in rural communities

Bank services and bank branches are essential to rural communities. This critical role has been fully recognized by the Federal Reserve. Our rural communities are some of the most authentic and cherished places in America, and yet they face lower incomes and wealth, lower rates of business start-ups, and higher rates of unemployment.

49 out of 55 counties in West Virginia are defined as "rural" by the US Census Bureau, with county populations below 65,000. 50.9% of the total state population (942,029 people) live in rural areas and West Virginia has the third highest proportion of people living in rural areas in the country (only Maine and Vermont rank higher).¹

As a prominent force for economic research, the Federal Reserve also knows that poverty remains a characteristic of disadvantaged rural communities as Federal Reserve Board Governors Powell and Quarles have very recently acknowledged in speeches given with a rural focus.ⁱⁱ

Fed Chairman Jerome Powell gave a speech titled *Encouraging Economic Development in High-Poverty Rural Communities* at a policy forum in Mississippi. Similarly, Vice Chairman for Supervision, Randall Quarles gave a speech titled *Banks as Vital Infrastructure for Rural Communities of the West*.ⁱⁱⁱ Both of these speeches recognized the necessity of serving the financial needs of rural communities. While the challenges in these communities are persistent, the need for access to financial services, and for the leadership that is provided by banking partners such as BB&T and SunTrust are critical to nurturing emerging opportunities and driving forward economic development.

The Federal Reserve has been clear about its understanding of this critical need. The question is before us now of whether the Federal Reserve Board will apply this understanding to its review of the merger between BB&T and SunTrust.

What we know about BB&T and SunTrust in West Virginia

The merger of BB&T and SunTrust creates the potential for multiple potential impacts that could negatively affect banking services in West Virginia. These concerns arise from the unique relationship that both banks have with West Virginia: for BB&T as a financial institution that provides critical leadership in the state, and for SunTrust as a bank that recently completed a total disinvestment from the state.

SunTrust entered the West Virginia market in 2004 when it bought National Commerce Financial Corp., giving it a presence with ten offices, primarily in and around the capital city of Charleston, West Virginia. However, SunTrust began closing its West Virginia offices several years later, downsizing to six offices in 2013, five offices in 2017, and eventually zero offices by June 30, 2018. SunTrust, which had honed a more urban strategy, moved away from serving the West Virginia market altogether less than fifteen years after entering the state.

BB&T, on the other hand, has shown a strong and important commitment to West Virginia. BB&T entered the West Virginia market in 1999, when it completed the acquisition of Matewan Bancshares of Williamson, West Virginia. BB&T started out with 1.55% of the market and by June 30, 2000 was 12th in the state with seven offices and \$318,540,000 in deposits. Over the course of the next eighteen years, BB&T successfully and rapidly grew its business in West Virginia. **As of June 20, 2018, BB&T held the largest market share in the state of West Virginia (for all FDIC-Insured institutions for deposits) with 15.81% of the West Virginia market, 63 offices, and \$5,261,134,000 in deposits.**

While BB&T has been serving the state since 1999 and growing its business, in recent years it has also had the need to close branches. From a high of 78 branches in 2013 and 2014, BB&T consistently closed branches from 2015-2018 ending with 63 branches before the merger. While we understand that branch closings can be part of normal operations for a financial institution, it is a move that has additional implications in rural states.

Rural communities need partners that can overcome credit issues, provide technical assistance to small businesses, support capacity building, and invest in core needs. Chairman Powell references this issue in his February speech,

“In 2018 Federal Reserve staff members met with leaders in rural areas across the country that had recently experienced a bank branch closure. We found that small businesses, older people, and people with limited access to transportation are most affected. We also learned that the loss of the branch often meant more than the loss of access to financial services; it also meant the loss of financial advice, local civic leadership, and an institution that brought needed customers to nearby businesses.”^{iv}

West Virginia is a very rural state with transportation access challenges, particularly for rural communities that are a significant distance from micropolitan areas. Local bank branches are a critical mechanism to provide necessary financial services to geographically remote populations across the state. Additionally, and equally important, West Virginia has an aging demographic and lacks broadband infrastructure, limiting access to technology and online services that are becoming the norm in other parts of the country. Bank branches serve as a critical resource when you have a population that is not able to easily adopt on-line banking practices.

Small Business – an essential part of the local economy

Access to credit and capital for small businesses is another core concern in the merger process. In 2013 the Appalachian Regional Commission published a study that examined trends in the availability of capital and credit for small businesses in the Appalachian Region. The entire State of West Virginia is within the study area of this report, which found that *small business lending in Appalachia was about 18 percent lower than lending nationally,*^v and that bank branches are important to lending because *a higher number of bank branches was statistically correlated to a higher number of loans.*^{vi}

The potential for the merger to lead to continued branch closures and increased prioritization of urban investment strategies over rural services and support is a critical concern of our organizations.

The reality is that the Community Reinvestment Act obligations for large banks with regional or national presence can usually be met by making community investments and service commitments in non-rural service markets. This means that West Virginia may be overlooked as a state in a future CRA strategy, when West Virginia needs and deserves both CRA community development investment and banking services.

We urge the reviewing agencies of this merger and the banks themselves to recognize the key resources that currently operate within West Virginia that could be essential partners in continuing to leverage and accelerate CRA investments and banking services for rural communities. A dedicated partnership with these entities would continue – and grow – support for West Virginia communities while still enabling the merged bank to continue its regional and national growth strategy.

With this grim truth, we must focus our effort on the shining examples of successful support and investment. In West Virginia, mission-oriented lenders, Community Development Financial Institutions (CDFI) and alternate loan funds are shining examples of successful support and

investment strategies for a rural state. These lenders are the ones filling in the gaps of credit, capital, technical assistance and capacity building in the rural context.

Mission lenders are getting the work done in West Virginia

West Virginia has a strong peer group of CDFIs that works hard to provide loans and services to small businesses, affordable housing developers, and investors in healthcare (such as Federally Qualified Health Centers, which are vital in rural states).

We documented the success of CDFIs and loan funds in West Virginia long before this merger was planned. A peer group of West Virginia CDFIs was formed in 2011 with the help of the Federal Reserve Bank of Richmond. This group, called the West Virginia Loan Fund Collaborative, has grown from a base lending pool of \$7 million dollars available in 2011, to over \$45 million in 2017. The success of this group has been tracked and documented, most notably by the Federal Reserve Bank of Richmond in its 2015 Marketwise Community report,^{vii} and its 2018 Community Scope^{viii} on the growth and evolution of CDFI partnerships.

The one place that we feel the most confident that a merger between BB&T and SunTrust could make a meaningful, responsible, and strategic investment would be in the mission-driven lending partners in the West Virginia Loan Fund Collaborative.

These organizations are serving all regions of the state, including the southern coalfields and mountain highlands, and their loan activity has grown consistently since tracking began in 2011. Neither BB&T nor SunTrust have a track record of investing in West Virginia CDFIs through a CRA strategy and yet these mission-focused lenders provide needed technical support along with credit and capital in the areas of housing, small business, and healthcare facilities.

Our recommendation is to make an intentional investment in West Virginia that will include both financial and non-financial considerations. Commit to a 5-year community benefits agreement to fund lending and community investments in West Virginia, and reoccurring investments in equal amounts as recommended to ensure that the new bank has a legitimate track record and commitment to CRA strategy in West Virginia.

Our recommendations

1. **Invest \$20 million dollars of capital, collectively into the CDFI organizations and mission-focused alternative lending partners** that are part of the West Virginia Loan Fund Collaborative to support housing, small business and healthcare facilities.
 - a. Document this activity as a real part of the new bank's CRA strategy.
 - b. This investment will ensure access to capital for housing, health, and small business.
 - c. This investment will engage the organizations that are already working hard throughout the state to serve community credit needs.
 - d. This investment is needed to build up the capital resources for a pipeline of projects in need.

2. **Maintain a CRA staff** presence in West Virginia.
 - a. BB&T holds the largest market share in West Virginia, and thus BB&T should keep a full time CRA officer based in West Virginia.
 - b. CRA officers are community leaders and partners in understanding the challenges facing rural communities. You need them to inform your banking practices and ensure ties to the markets you serve.
 - c. Continue BB&T's current practice of engaging stakeholders through bi-annual meetings of Community Development Councils, providing a form for input on the new bank's programs and policies that impact community development and neighborhood revitalization.

3. Develop a plan to **support financial literacy and financial education programs in West Virginia** through the schools and nonprofit organizations.

4. **Support entrepreneurship education in the schools** through organizations that work with K-12 and the higher education learning systems in the state.

5. **Support business innovation and technical assistance** through organizations that provide critical services to entrepreneurs and small businesses in rural communities.

6. Make an intentional effort to **direct philanthropic dollars** through the new bank's foundation arm to rural community issues in West Virginia.

West Virginia has a core group of established organizations that are dedicated to advancing housing, health, small business, and education. These organizations are stable, trusted, and proven in their knowledge of rural strategies. The activities matrix below identifies some of the best players for community investment and execution.

ACTIVITY	5 YR TARGET INVESTMENT	CORRESPONDING CONCERN
1. Affordable housing and mortgage lending to LMI Communities & Borrowers through CDFI partners and mission-focused alternative lenders, such as Community Works in WV, Inc.	\$3 Million	Access to credit and capital
2. Small Business Lending in LMI Communities through CDFI partners and mission-focused alternative lenders: WV Loan Fund Collaborative members	\$15 Million	Access to credit and capital
3. Make community clinic and health facilities Investments in rural communities through health sector CDFI partners and mission focused alternative lenders, such as: Center for Rural Health Development	\$2 Million	Build up the capital resources for a pipeline of projects in need
4. Make investments into community organizations and initiatives including but not limited to economic development, neighborhood revitalization/stabilization, and community services through the new bank's Foundation arm.	\$1.5 Million	Loss of Civic leadership
5. Financial education and financial literacy, such as KISRA	\$3 Million	Loss of financial advice
6. Entrepreneurship and Innovation support to organizations such as INNOVA, Tech Connect and member organizations; WV Hive	\$5 Million	Loss of financial advice
TOTAL Impact: Housing, Health, Small Business, Education, and Nonprofit	\$29.5 Million	

In closing, we fear the inevitable decline in banking services in West Virginia as a result of this merger.

We expect that this merger will lead to a redirection of focus of the CRA efforts in rural communities and in states in the southern geography of the current BB&T and SunTrust banking footprint. This change in CRA focus and the likely additional closing of bank branches will negatively impact banking services in West Virginia. SunTrust's movement away from the West Virginia market, along with BB&T's branch closures in West Virginia, should be taken into consideration by the regulators as BB&T and SunTrust merge.

Please consider the complexity of rural communities and the important role that banking services play in disadvantaged local economies. The CRA strategy for large banks should not forget about rural communities, but rather encourage banks to seek more opportunities in underserved areas. As a new bank emerges from this merger, the best way to support a strong and stable economy in West Virginia is to invest in our strong system of successful CDFIs who invest in housing, health, and small business, and to further support those dedicated to entrepreneurship and financial education.

SIGNED

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Direct Recipients:

Governor Lael Brainard, Chair, Committee on Consumer and Community Affairs, Board of Governors of the Federal Reserve System

Mr. Eric Belsky, Director, Division of Consumer and Community Affairs, Board of Governors of the Federal Reserve System

Mr. Michael Gibson, Director, Supervision and Regulation, Board of Governors of the Federal Reserve System

Ms. Lisa White, Executive Vice President, Supervision, Regulation and Credit, Federal Reserve Bank of Richmond

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Ms. Cynthia Goodwin, Vice President and Interim Head of Supervision, Federal Reserve Bank of Atlanta

Mr. Kelly King, Chairman and CEO, BB&T Corporation

Ms. Sharon Jeffries-Jones, Senior Vice President and Director, CRA/Community Development Department, BB&T Corporation

Mr. Brian Coyle, CRA Investment Manager, BB&T Corporation

Mr. William Rogers, Jr. Chairman and CEO, SunTrust Banks, Inc.

The Honorable Maxine Waters, Chair, U.S. House Committee on Financial Services, U.S. House of Representatives

Mr. John Taylor, President and Founder, National Community Reinvestment Coalition

Mr. Jesse Van Tol, Chief Executive Officer, National Community Reinvestment Coalition

Cc:

The Honorable Shelley Moore Capito, U.S. Senate

The Honorable Joe Manchin, U.S. Senate

The Honorable David McKinley, U.S. House of Representatives

The Honorable Alex X. Mooney, U.S. House of Representatives

The Honorable Carol Miller, U.S. House of Representatives

Federal Co-Chair Tim Thomas, Appalachian Regional Commission

The Honorable Jim Justice, Governor of West Virginia

Ms. Dawn Holstein, Commissioner of Banking, West Virginia Division of Financial Institutions

Secretary Ed Gaunch, West Virginia Department of Commerce

Mr. Kris Warner, State Director, USDA Rural Development in West Virginia

Ms. Sally Cline, President and CEO, West Virginia Bankers Association

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Federal Reserve Bank

-

March 27, 2019

RE: CRA Protest Complaint / SunTrust Bank Merger Applications

This letter is part of the continuing communications between the **Renaissance Indexes Group** (RIG, Claimant) and the **Federal Reserve Bank** and outlines the **CRA Protest Complaint** filed by Claimant to deny approval of the **Merger Application** submitted by **SunTrust Bank** for Acquisition by BB&T Bank.

The CRA Protest Complaint is filed under the Community Reinvestment Act, (CRA), Equal Credit Opportunity Act (ECOA), Fair Housing Act – to include the Final Rule, FTC Act- Section 5, (Deceptive Practices), Home Mortgage Disclosure Act, Regulation B & C, Title VIII – 1968 Civil Rights Act and under the Equal Protection Clause – 14th Amendment – United States Constitution

The **CRA Protest Complaint** is filed under the controlling authority of the

--US Supreme Court ruling in **TDHCA V ICP, Inc.** – which established liability under the **FHA** for any Bank (or lender) practice or action – even where facially neutral - that has the disparate impact on members of a protected class – in this case the protected class of black Americans

-the controlling authority of the federal district court ruling in **US V Hudson City Savings Bank FSB** that established and expanded liability under the **ECOA** for any Bank practice that denied the equal opportunities to secure credit transactions and for any Bank practice that discourages members of a protected class from applying for credit – specific example cited in this case and in the RIG CRA Protest Complaint – is the continuing Bank practice of placing its Bank branches outside of the Neighborhoods of the protected class of black Americans

-the controlling authority of the Federal District Court ruling in **US V Chevy Chase FSB** that expanded Bank liability under the **FHA** – (to include the Final Rule) and **ECOA** for any Bank practices that has the disproportionate discriminate effect on the members of a protected class – to include the protected class of black Americans – to include placement of Bank branches outside of the black American Neighborhoods – as in this case against **SunTrust Bank**

-the controlling authority of the Department Complaint – HUD Discrimination Charges – holding in **US Midland States Bancorp** that established liability under the banking laws

where the Bank has structured its business in such a way as to avoid doing equal business in the black American Neighborhoods, for any Bank practice that fail to penetrate the communities of members of a protected class with equal lending and that failed to **equally** market its lending and credit products to the members of a protected class

Claimant respectfully **petitions** that the **Federal Reserve Bank** faithfully execute its sworn duties in a way that is consistent with the controlling authority of the Court rulings -and to apply and to conduct the investigation and to enforce the rules pursuant to the Fair Housing Act – **Final Rule** to the Complaint. The Illegal Discrimination Claims in the RIG CRA Protest Complaint are not “comments to be considered” rather the **List of Illegal Discrimination Claims** are full-blown Complaints and form the prima facie case for disparate impact by the practices and actions (and non-actions) of **SunTrust Bank under the FHA Final Rule**.

Claimant further petitions that **FRB** honor the Claimants rights to frame the CRA Protest Complaint – the Complaint is limited to the underserved individuals, households businesses in the Neighborhoods in the specified Zip Codes of the protected class of black Americans.

Neither the **FRB** nor **SunTrust Bank** has the right to **replace** –and in effect to ignore - the clearly identified aggrieved parties of PROTECTED CLASS OF BLACK AMERICANS with “minority census tracts”, LMI census tracts”, majority-minority census tracts”, “high minority census tracts” – that are all found **outside** of the black American Neighborhoods in the specified Zip Codes.

Such **outside** findings do nothing to deliver the **full enjoyment of equal rights** in banking, lending and capital to the protected class of black Americans specifically named in the RIG Complaints – secured under the CRA, ECOA, FHA –Final Rule, FTA Act- Section 5, Regulations B & C

Under this present untenable and unreasonable posture **SunTrust Bank** is enabled by the **FRB** to deny the equal rights in equal access to capital, banking, lending, Bank branches and banking services to the black American Neighborhoods **from here until eternity** with impunity and with no sanctions by the FRB – the evidence for this posture is found in the truth that the vast majority of **SunTrust Bank** branches and the 2 New Bank branch application locations are all **outside** of the black American Neighborhoods in Houston (and in Dallas)

Indeed, such actions and practices by the **FRB** are just as repulsive as the practices and actions of **SunTrust Bank** that result in the disparate impact and disproportionate discriminate effect on the protected class of black Americans

--are the worst kind of "governmental support" as cited by the Supreme Court Justice Anthony Kennedy in the controlling ruling in **TDHCA V ICP, Inc**

--work to enable **Frost Bank** to continue to deny the equal rights to lending, Bank branches, banking services community outreach to the protected class of black Americans inside of the specified Zip Codes --are complete failings of the faithful execution of sworn duties – are deliberate supervisory failings and enforcement lapses – made all the more hideous as it is done by the very Agency vested with the sworn duties to investigate illegal discrimination, enforce the broad remedial corrective enforcement actions and to sanction and to punish the Banks for continued practices and actions that result in the disparate impact and in the disproportionate discriminate effect on the protected class of black Americans

The Agency's sworn duties under the law as part of the enforcement branch of government assigned with the enforcement of the banking laws are all too clear –

The FRB has acted in a manner that is inconsistent with the controlling authority of the US Supreme Court rulings in **TDHCA V ICP, Inc** , inconsistent with the Department's **FHA Final Rule** – and is inconsistent with the controlling authority of **US V Hudson City Savings Bank FSB** ruling – which collectively form the **New Standards** that govern the banking complaint investigations and enforcement actions.

The Banks' legal obligations under the **FHA – Final Rule** are clear – and are not open to Agency (or Bank) reinterpretation:

Pursuant to the RIG Complaint the prima facie case for disparate impact and illegal discrimination on members of a protected class is established – **SunTrust Bank** is legally

obliged to provide the legally sufficient justification to prove that the practices challenged in the Complaint are necessary to achieve one or more of the Bank's legitimate substantial nondiscriminatory interests – and that these interests – where legitimate – could not be achieved by another practice with a less discriminatory effect.

Even where **SunTrust Bank** meets the initial burden of proof the Claimant may still establish liability under the **FHA Final Rule** by presenting a different Bank practice that has a less discriminatory effect.

The **FHA Final Rule** allows for no exceptions, waivers, partial measures or denials of the Illegal Discrimination Claims – **SunTrust Bank** either fully meets this burden of

proof pursuant to its responsibilities under the **FHA Final Rule** – or it does not – where **SunTrust Bank** fails to fully meet this burden of proof the Illegal Discrimination Claims stands –where **SunTrust Bank** refuses to answer the Illegal Discrimination Claims – the Claims stands. The FRB is duty bound to impose the enforcement actions. AS the Fair Housing Act calls for broad remedial measures for the reclamation of the denial of equal rights in equal access to capital, banking, lending, banking services denied to members of a protected class – in this case the protected class of black Americans - the Agency is bound by the FHA’s broad remedial reach – as in **Robust Capitalized Measures** - RCM

The overarching theme in the RIG CRA Protest Complaint is that **SunTrust Bank** has engaged (and is still engaged) in practices, actions (and non-actions) and patterns that are in violation of the Fair Housing Act – to include the Final Rule 100.500 and in violation of the Equal Credit Opportunity Act and of Regulation B

--by designating their service and CRA Assessment Area in such a way that **excludes** the areas of concentration of the majority black American Neighborhoods and of locating its branches and services in such a manner that did not (and does not) grant **equal access** based on race and Zip Codes divisions and of failing to market its lending and its residential real estate related products to the protected class of black Americans.

--these practices and actions result in a lack of market penetration in the majority black American Neighborhoods in the urban markets.

--where the physical address of the Bank branches and geographical dollar amounts evidence manifest that **SunTrust Bank** has avoided doing Equal business in and has placed its bank branches and lending **outside of the majority black American Neighborhoods** in the specified Zip Codes in Houston the FHA, ECOA and Regulation B make no distinction of where and **whatever other** Neighborhoods the Bank is doing business and has placed its Bank branches in – whether **100%** of its Bank branches and lending are placed in the Anglo Neighborhoods or whether **75%** in the Anglo Neighborhoods and **25%** in “majority-minority” or “minority census tracts” that **are all outside** of the majority black American Neighborhoods in the specified Zip Codes this practice by the Bank **effects the same results –disparate impact on the protected class of black Americans.**

--the **denial of the full enjoyment** of Equal rights secured under the CRA, ECOA, FHA – to include the Final Rule and Regulation B and Title VIII – 1968 Civil Rights Act

To the **protected class of black Americans** in the majority black American Neighborhoods in the specified Zip Codes

The scrambling, finding and stumbling upon **SunTrust Bank** branches. Lending, Community Development Loans, community outreach, advertising and Charitable Contributions in other “minority census tracts” and in other “majority-minority districts” “LMI census tracts” – that are all **outside** of the majority black American Neighborhoods is **denial** of Rights of Claimant, not acceptable and no longer works as an excuse to get the Bank off on the **Illegal Discrimination Claim** of illegal discrimination in the placement of Bank branches and lending – and in other banking category..

The Agency determinations of illegal discrimination in all of the banking categories outlined in the Complaint can only be made by what is **found** and is **not found inside** of the majority black American Neighborhoods in the specified Zip Codes

SunTrust Bank has avoided doing **business** in the black American Neighborhoods in – as evidenced by the fact that **SunTrust Bank** has not built a **single Bank branch**, has not made a single increase in **lending** – business, mortgage or home Equity, has not made a single increase in any **bank financed developments** – stores, hotels, apartments, office towers, luxury mixed use developments, does not have **single** annual advertising contract and has not made single increase in **advertising**, does not have a single black American Capitalized CRA Partnership, does not have a single Capitalized black American **Neighborhood group**, does not have a single black American Capitalized Credit Needs Assessment Consultant. has not made a single increase in **Community Outreach, promotion or marketing** of a single loan or credit products, has not made a single **Community Development Loan**, has not made a single increase in any **Charitable Contribution**, has not made a single increase in any **commercial** or **construction** lending, in a **single** black American Neighborhood in a **single specified Zip Codes**.

SunTrust Bank is as invisible in the black American Neighborhoods and in the other markets today as it was when the Bank first opened.

Standard is Equal / Not Adequate

The standard for the rights of the protected class of black Americans and what is to determine the findings of illegal discrimination, redlining and violations of the banking laws against **SunTrust Bank** for the following: Bank branches, bank financed developments, lending- business, mortgages, home equity –in Equal numbers, amounts terms – Community Development Loans, advertising, promotion of loan and credit products, asset based financing and financing of wealth creating entities – Stock Brokerage Houses, Trading Companies, Private Equity Groups -

is **EQUAL** not Adequate.

Claimant finds nowhere in the banking laws: CRA, ECOA, FHA – to include the Final Rule, Regulation B, Fair Lending Laws where the standard for the protected class of black Americans is Adequate rather than **EQUAL**,

Claimant finds nowhere in the rulings of the governing cases of US V Chevy Chase FSB and US V Hudson City Savings Bank and US V First American Bank where the standard to determine violation of the banking laws is Adequate rather than **EQUAL**

Claimant finds nowhere in the Civil Rights Laws – Title VIII – 1968 Civil Rights Act – where the standard for the protected class of black Americans has been lowered to Adequate rather than **EQUAL**

Claimant finds nowhere in the Equal Protection Clause – 14th Amendment – US Constitution where the Bank can legally hold the protected class of black Americans to the lower standard of Adequate rather than **EQUAL – and still be in compliance with the laws.**

Claimant finds nowhere in the banking regulations and statutes where the Bank can be placed in and remain **in full compliance** with all of the banking laws – CRA, ECOA, FHA , Regulation B and FTC Act – Section 5 while relegating the protected class of black Americans to the second standard of Adequate rather than **EQUAL**

Claimant finds nowhere in the laws where the protected class of black Americans are not held to the same standard of the full enjoyment of **EQUAL** rights in banking services, branches, lending ,Community Development Loans and in bank financed Developments

Claimant petitions that **SunTrust Bank** be held to the standard of **EQUAL** by the **FRB-D** to determine whether **SunTrust Bank** has perpetrated illegal discrimination, redlining and denial of equal access to capital against the protected class of black Americans in the 21 Zip Codes outlined in the Claimants' banking complaint.

Illegal Discrimination Claim Certification

Pursuant to the deep, wide, Color of Money Investigation into the CRA Protest Complaint and pursuant to the search for the whole truth Claimant petitions the following:

--That **SunTrust Bank** be directed to answer the **Illegal Discrimination Claims (IDC)** directly –as in refute with evidence and present the legally sufficient justification to justify the stark and glaring disparities outlined in the Claims –

--That where **SunTrust Bank** cannot refute the IDC with evidence and fails to present the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests and that these interests – where legitimate – cannot be achieved by another practice that has a less discriminatory effect that the **IDC** is certified as true, entered into the investigation report and becomes the calculation for the Fines, Sanctions, Penalties, Monitoring and Capital Fund to be imposed –

The Illegal Discrimination Claims are as follows:

Bank Branches

The Claim in the Complaint states that **SunTrust Bank** is engaged in the continuing practice of placing its Bank branches outside of the black American Neighborhoods – in the specified Zip Codes- as found from the evidence data – the **geographical reality of brick and mortar placement** – that **SunTrust Bank** has placed **95%** of its Bank branches – **free-standing edifices- outside** of the black American Neighborhoods and in the neighborhoods of the Anglo Zip Codes – and has placed **less than 2% of its Bank** branches in the specified Zip Codes in the neighborhoods of the protected class of black Americans –The Claim establishes the prima facie case for disparate impact on the protected class of black Americans and establishes liability under the FHA Final Rule and for disproportionate discriminate effect under the ECOA.

Pursuant to its responsibilities under the FHA Final Rule **SunTrust Bank** is legally obliged present the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests and that these interests – where legitimate – cannot be achieved by another practice with a less discriminatory effect justify this stark and glaring disparity and denial of the full banking services that can only be found in full service Bank branches in equal bank branch geographical distribution.

Should the deep, wide , Color of Money **CRA Protest Complaint** Investigation find from the evidence data that this geographical reality of **Bank branch placement action** by **SunTrust Bank** has the requisite **disparate impact** and the disproportionate discriminate effect on the protected class of black Americans and forms the prima facie case for illegal discrimination pursuant to the **FHA Final Rule** and to the **ECOA Effects Test**; forms the case for non-compliance and for violation of the banking laws **and** that this geographical reality of Bank branch placement is in violation of the holding in the governing cases of **US V Hudson City Savings Bank US V FSB** and **US V Chevy Chase FSB**.

Claimant respectfully petitions:

That where **SunTrust Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests that the **Illegal Discrimination Claim** of illegal discrimination in equal Bank branches is certified as true and that it be notated in the official investigation report that in the **geographical distribution of Bank branches** between the neighborhoods in the Anglo Zip Codes and the neighborhoods in the Zip Codes of the protected class of black Americans that **SunTrust Bank** – is in violation of the ECOA and FHA to include the Final Rule.

Advertising / Marketing Placement

The Claim in the Complaint states that **SunTrust Bank** has failed to equally market the full range of its lending and credit products with the black American Media and to the black American Neighborhoods – and has failed to penetrate the black American Neighborhoods in **the** assessment areas where SunTrust does business.

Pursuant to its responsibilities under the FHA Final Rule **SunTrust Bank** is legally obliged to provide the legally sufficient justification to prove that the practice challenged in the Complaint to prove that this practice is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests and that these interests – where legitimate – could not be achieved by another practice with a less discriminatory effect.

Should the deep, wide, Color of Money **CRA Protest Complaint** Investigation find from the evidence data- the Media reality – that **SunTrust Bank** has placed **95%** of its advertising and marketing with the general and Anglo Media and places only **1%** of advertisements with the black American owned, operated and oriented Media and that **SunTrust Bank** does not have a **single annual advertising** or marketing contract with a single entity of the black American owned or operated or oriented Media Newspaper, Radio, TV or Internet

Should the deep, wide, Color of Money **CRA Protest Complaint** Investigation find from the evidence data that this advertising and marketing placement action and practice by **SunTrust Bank** has the requisite disparate impact and disproportionate discriminate effect on the protected class of black Americans and establishes liability under the FHA Final Rule and under ECOA **Effects Test**; forms the case for non-compliance and violation of the **ECOA**; forms the case for violation the **CRA** due to the unequal investments in advertising and marketing and forms the case for violation of the holding in the governing Court cases of TDHCA V ICP, Inc. US V Midland States Bancorp and **US V Chevy Chase FSB**

That where **SunTrust Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests that the **Illegal Discrimination Claim** of illegal discrimination in equal advertising is certified as true and that it be notated in

the official investigation report that in the **equal advertisements and equal investments** in same between the Anglo and general owned and operated Media in the neighborhoods in the Anglo Zip Codes and the black American owned and operated Media and the neighborhoods in the Zip Codes of the protected class of black Americans that **SunTrust Bank** – is in violation of the ECOA and FHA – **Final Rule**

In the **Lending categories** that follow that state that **SunTrust Bank** is engaged in practices, actions and policies that deny Equal lending to the protected class of black Americans. These practices, policies and actions by **SunTrust Bank** result in illegal discrimination in lending – and does not meet the Banks' duties under the **FHA Final Rule**.

Home Improvement / Equity Loans

Should the deep, wide, Color of Money **banking Complaint** investigation find from the evidence that **SunTrust Bank** has originated the vast majority (**85%**) of its home improvement loans **outside** of the black American Neighborhoods and in the majority Anglo neighborhoods and less **than 10%** in the neighborhoods of the protected class of black Americans – This practice has the disparate impact and the disproportionate discriminate effect on the protected class of black Americans in **the black American Neighborhoods** – and pursuant to the FHA Final Rule establishes the prima facie case for disparate impact under the FHA Final Rule and for disproportionate discriminate effect under the ECOA.

Pursuant to its responsibilities under the FHA Final Rule **SunTrust Bank** is compelled to provide the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests – and that these interest – where legitimate- could not be achieved by another practice with a less discriminatory effect – and to otherwise justify this stark and glaring disparity and denial of equal home improvement loans to the neighborhoods of the protected class of black Americans?

Should the deep, wide Color of Money **CRA Protest Complaint** investigation find from the evidence that this action and practice in regard to **SunTrust Bank** practice and policies of **home improvement lending** has a disproportionate discriminate effect on the protected class of black Americans and establishes the prima facie case for illegal discrimination pursuant to the FHA Final Rule and ECOA **Effects Test**; forms the case for illegal discrimination in residential real estate related transactions in violation of Section **805 of the Fair Housing Act**; forms the case for illegal discrimination against applicants for credit transactions in violation of the **ECOA** and forms the case for violation of the holdings in the governing case of **US V Chevy Chase FSB**

That where **SunTrust Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests that the **Illegal Discrimination Claim** of illegal discrimination in home improvement lending is certified as true and that it be notated in the official investigation report that in the of the equal marketing, soliciting and making of home improvement loans between the Anglo neighborhoods in the Anglo Zip Codes and the black American neighborhoods in the Zip Codes of the protected class of black Americans that **SunTrust Bank** – is in violation of the ECOA and FHA – Final Rule.

Business Lending/Lines of Credit /Loans

The Claim in the **CRA Protest Complaint** states and finds from the evidence data – the reality of which neighborhoods, addresses and Zip Codes the **SunTrust Bank** business loans are made to and to whom the business loans are made to – that **SunTrust Bank** has made the overwhelming majority of its business loans – upwards of **90%** in the Anglo neighborhoods and to the Anglo owned and operated businesses – both in terms of the amount of applications and approvals and in terms of the sheer larger amounts and has not made the corresponding business loans or investments in marketing and promotion of same in the neighborhoods and Zip Codes of the protected class of black Americans. This practice has the disparate impact and disproportionate effect on the protected class of black Americans in Houston and is liable under the FHA Final Rule and under the ECOA, respectively.

Pursuant to the FHA Final Rule **SunTrust Bank** is legally obliged to provide the legally sufficient justification to prove that this practice is necessary to achieve one or more of the Bank's legitimate substantial nondiscriminatory interests and that these interests – where legitimate – could not be achieved by another practice with a less discriminatory effect – and to otherwise justify this horrific disparity and denial of business loans and credit products and marketing and promotion of same to the black American owned and operated businesses in the neighborhoods and Zip Codes of the protected class of black Americans.

Should the deep, wide, Color of Money **CRA Protest Complaint** investigation find from the evidence that this action and practice of **SunTrust Bank** with regard to **business lending** and lines of business credit has the disparate impact and disproportionate discriminate effect on the protected class of black Americans and establishes the prima facie case for illegal discrimination pursuant to the **FHA Final Rule** and **ECOA Effects Test**; forms the case for illegal discrimination against the protected class of applicants with respect to credit transactions in non-compliance and in violation of the **ECOA** and forms the case for violation of the rulings in the governing case of **US V Chevy Chase FSB** ---the Illegal Discrimination is established.

That where **SunTrust Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' **legitimate, substantial nondiscriminatory interests** that the **Illegal Discrimination Claim** of illegal discrimination in business lending is certified as true and that it be notated in the official investigation report that in the equal marketing, soliciting and making of **business loans between** the Anglo owned and operated businesses in the neighborhoods in the Anglo Zip Codes and the black American owned and operated businesses in the neighborhoods in the Zip Codes of the protected class of black Americans that **SunTrust Bank** – is in violation of the ECOA and FHA - Final Rule.

Commercial and Construction Lending/Loans

The Illegal Discrimination Claim states that **SunTrust Bank** has denied the equal marketing, promoting and making of the Commercial and Construction lending to the black American Neighborhoods in the specified Zip Codes where SunTrust Bank does business and has placed 95% of lending in this category outside of the black American Neighborhoods. This continuing practice has the disparate impact and the disproportionate discriminate effect on the protected class of black Americans and establishes liability under the FHA Final Rule and under the ECOA.

Pursuant to its responsibilities under the **FHA Final Rule** SunTrust Bank is legally obliged to provide the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests – and that these interests – where legitimate – could not be achieved by another practice that has a less discriminatory effect.

Should the deep, wide, color of Money **CRA Protest Complaint** investigation find from the evidence data that – the reality of which neighborhoods and applicants **SunTrust Bank** made the **vast majority** of its commercial and construction loans – that **95%** of **SunTrust Bank's** commercial and construction lending was made outside of the neighborhoods of the Zip Codes of the protected class of black Americans with less than this percentage made to any black American contractors in the Zip Codes of the protected class of black Americans – both in the terms of the **number** of applications and approvals and in the **amounts** and sizes of the commercial and construction loans

Should the deep, wide, Color of Money **CRA Protest Complaint** investigation find from the evidence that this action and practice in **SunTrust Bank's** commercial and construction lending has the disparate impact and disproportionate discriminate effect on the protected class of black Americans and forms the prima facie case for illegal discrimination pursuant to the **FHA – Final Rule** and the **ECOA Effects Test**; forms the case for illegal discrimination against the protected class of black Americans with respect to credit transactions in non-compliance and in violation of the **ECOA** and forms

the case for violation of the ruling in the governing cases of TDHCA V ICP, Inc., US V Hudson City Savings N=Bank FSBUS V Chevy Chase FSB -----

That where **SunTrust Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests the **Illegal Discrimination Claim** of illegal discrimination and redlining in commercial and construction lending is certified as true and that it be notated in the official investigation report that in the equal advertising, promotion and making of **commercial and construction loans between** the Anglo neighborhoods in the Anglo Zip Codes and the black American neighborhoods in the Zip Codes of the protected class of black Americans that **SunTrust Bank** – is in violation of the ECOA and FHA – **Final Rule**.

Bank Financed Developments

The Claim in the **CRA Protest Complaint** states from the evidence data - **geographical reality** - that **95% of SunTrust Banks'** bank financed developments - stores, restaurants, hotels, apartments complexes supermarkets, office towers and luxury mixed use complexes are placed in the neighborhoods of the Anglo Zip Codes with no corresponding bank financed developments made in the neighborhoods in the Zip Codes of the protected class of black Americans – this practice has the disparate impact on the protected class of black Americans in Dallas

Pursuant to its responsibilities under the **FHA Final Rule SunTrust Bank** is legally obliged to provide the legally sufficient justification to prove that this practice is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests –and that these interest – where legitimate – could not be achieved by another practice with a less discriminatory effect and to justify this glaring, stark disparity and overwhelming reality of the placements of its bank financed developments – between the two sets of Zip Codes?

Should the deep, wide, Color of Money **CRA Protest Complaint** investigation find from the evidence that this action and practice in **SunTrust Bank** bank financed developments and in its vast majority placement in the Anglo neighborhoods has the **disproportionate discriminate effect** on the protected class of black Americans and forms the prima facie case for disparate impact FHA – Final Rule and illegal discrimination pursuant to the ECOA **Effects Test**; forms the case for illegal discrimination against the protected class of black Americans with respect to credit transactions in non-compliance and in violation of the **ECOA** and forms the case for violation of the ruling in the governing case of **US V Chevy Chase FSB and US V Hudson City Savings Bank**

That where **SunTrust Bank** fails to provide the legally sufficient justification to prove that this practice is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests - that the **Illegal Discrimination Claim** of illegal discrimination and redlining in Bank Financed developments - and its **95%** placement in the Anglo neighborhoods is certified as true and that it be notated in the official investigation report that in the equal making of **bank financed developments** between the Anglo neighborhoods in the Anglo Zip Codes and the black American neighborhoods in the Zip Codes of the protected class of black Americans that **SunTrust Bank** – is in violation of the ECOA and FHA – **Final Rule**

Community Development Loans

The Claim in the **CRA Protest Complaint** states that the neighborhoods and Zip Codes of the protected class of black Americans are denied the equal investments of Community Development loans and that **90%** of **SunTrust Bank's** Community Development loans are made in the Anglo neighborhoods and Zip Codes – to the detriment of the black American neighborhoods and should the evidence further find that the neighborhoods of the protected class of black Americans are aggrieved by the **Disparate Treatment** from **SunTrust Bank** in that any “Community Development” loans are limited to the servicing of rehabilitation sewer holes and detoxification cesspools and for a “wider array of homeless services” that does not develop or revitalize the community in the least – as opposed to the Community Development loans that revitalize the communities in the Anglo Zip Codes. **SunTrust Bank** has not developed a single Hi Tech Center, Apprenticeship Facilities or Neighborhood Center in a single black American Neighborhoods.

Pursuant to its responsibilities under the FHA final Rule **SunTrust Bank** is legally obliged to provide the legally sufficient justification to prove that this practice is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests –and that these interests could not be achieved by another practice with a less discriminatory effect - to otherwise justify this wide disparity – number, size and amounts - and different standards for Community Development loans made between the two sets of Zip Codes of Anglo and black Americans

Should the **CRA Protest Complaint** investigation find from the evidence that this policy, action and practice in **SunTrust Bank** Community Development Loans and in its vast majority placement in the Anglo neighborhoods and in its different standards for the neighborhoods of the protected class of black Americans has the disparate impact and the **disproportionate discriminate effect** on the protected class of black Americans and forms the prima facie case for illegal discrimination pursuant to the FHA Final Rule and pursuant to the **Effects Test**; forms the case for illegal discrimination against the protected class of black Americans with respect to credit transactions in non-compliance

and in violation of the FHA and of the **ECOA** and forms the case for violation of the ruling in the governing case of **US V Chevy Chase FSB** -----

That where **SunTrust Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests that overcomes the statutes and laws cited above - that the **Illegal Discrimination Claim** of illegal discrimination in **Community Development Loans** - and its **vast majority** placement in the Anglo neighborhoods is certified as true and that it be notated in the official investigation report that in the equal making of **Community Developments Loans between** the Anglo neighborhoods in the Anglo Zip Codes and the black American neighborhoods in the Zip Codes of the protected class of black Americans that **SunTrust Bank** - is in violation of the **ECOA and FHA - Final Rule**

Promotion of Loan/Credit Products

The Claim in the **CRA Protest Complaint** state that **SunTrust Bank** has deliberately failed to promote the Loan and Credit products in the neighborhoods of the protected class of black Americans and to actively seek to do business in these same neighborhoods the same way that **SunTrust Bank** does in the neighborhoods of the Anglo Zip Codes - and should the evidence illuminate further that **SunTrust Bank** has failed to promote even the basic banking services, credit services, Bank branches in the neighborhoods in the protected class of black Americans - but that **SunTrust Bank** displays giddy enthusiasm in promoting the "expanded suite of specialty commercial loan products", "wider array of credit services" and "loan products to the Anglo neighborhoods in the Anglo Zip Codes - this practice has the disparate impact on the protected class of black Americans

Pursuant to **FHA Final Rule SunTrust Bank** is legally obliged to provide the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Bank's legitimate substantial nondiscriminatory interests and that these interest - where legitimate - could not be achieved by another practice with a less discriminatory effect - to otherwise legally justify this two world difference - that happens to demarcate by race and Zip Codes - in the promotion of loan and credit products **between** the neighborhoods of the protected class of black Americans and in the Anglo neighborhoods in the Anglo Zip Codes?

Should the **deep, wide CRA Protest Complaint** investigation find from the evidence that this policy, action and practice in **SunTrust Bank Promotion of Loans / Credit Products** and in its vast majority placement in the Anglo neighborhoods and with no corresponding promotion of loan and credit products in the neighborhoods of the protected class of black Americans has the **disproportionate discriminate effect** on

the protected class of black Americans and forms the prima facie case for illegal discrimination pursuant to the FHA Final Rule and pursuant to the **Effects Test**; forms the case for illegal discrimination against the protected class of black Americans with respect to credit transactions in non-compliance and in violation of the **ECOA** and forms the case for violation of the ruling in the governing case of **US V Chevy Chase FSB** -----

That where **SunTrust Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests that overcomes the statutes and laws cited above - that the **Illegal Discrimination Claim** of illegal discrimination in the equal Promotion of Loan / Credit Products - and its **90%** placement in the Anglo neighborhoods with disregard and deliberate denial of same for the neighborhoods of the protected class of black Americans is certified as true and that it be notated in the official investigation report that in the equal servicing of **Promotion of Loan / Credit Products** between the Anglo neighborhoods in the Anglo Zip Codes and the black American neighborhoods in the Zip Codes of the protected class of black Americans that **SunTrust Bank** – the Illegal Discrimination Claim stands and the Bank is in violation of the ECOA and of the FHA **Final Rule**

Informational Banking Services

Should the deep, wide, Color of Money **CRA Protest Complaint** Investigation find from the evidence data that the households and businesses in the neighborhoods of the protected class of black Americans are aggrieved by the denial of equal right of the direct mailings and solicitations that SunTrust Bank freely makes available to the households and businesses in the neighborhoods of the Anglo Zip Codes and should the evidence further disclose that **SunTrust Bank** policy – limits the direct mailings and solicitations to the neighborhoods that are adjacent and nearby the **SunTrust Bank** Bank branches – and since **SunTrust Bank** discriminates against the black American Neighborhoods in placement of Bank branches the Informational servicers, direct mailings and solicitations cannot be equal – this practice has the disparate impact on the protected class of black Americans

Pursuant to the FHA Final Rule **SunTrust Bank** is legally obliged to provide the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests – and to otherwise justify this policy of direct mailings and business solicitations that denies the equal direct mailings and solicitations for business to the neighborhoods of the protected class of black Americans?

Should the deep, wide, Color of Money **CRA Protest Complaint** investigation find from the evidence that this policy, action and practice in **SunTrust Bank** direct mailings and

solicitations where **99%** of its direct mailings go to the households and businesses in the Anglo neighborhoods and with no corresponding direct mailings and solicitations to the households and businesses neighborhoods to the protected class of black Americans has the **disproportionate discriminate effect** on the protected class of black Americans and forms the prima facie case for illegal discrimination pursuant to the **Effects Test**; forms the case for illegal discrimination against the protected class of black Americans in non-compliance and in violation of the **ECOA** and forms the case for violation of the ruling in the governing cases of **US V Hudson City Savings Bank FSB** and **US V Chevy Chase FSB** -----

That where **SunTrust Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests that overcomes the statutes and laws cited above - that the **Illegal Discrimination Claim** of equal **Informational Banking Services** - and its **99%** of direct mailings and solicitation placement in the Anglo neighborhoods with disregard and deliberate denial of same for the neighborhoods of the protected class of black Americans is certified as true and that it be notated in the official investigation report that in the equal servicing of **Informational Banking Services** between the Anglo neighborhoods in the Anglo Zip Codes and the black American neighborhoods in the Zip Codes of the protected class of black Americans that **SunTrust Bank** is in violation of the **ECOA** and of the **FHA Final Rule**

Real Estate Related Transactions

The Claim states that **SunTrust Bank** is engaged in the continuing practice of denying the Equal Real Estate Related Transactions to the black American Neighborhoods. This practice has the disparate impact and the disproportionate discriminate effect on the protected class of black Americans and establishes liability under the **FHA Final Rule** and under the **ECOA**.

Should the deep, wide Color of Money **CRA Protest Complaint** Investigation find from the evidence that **SunTrust Bank** has originated the vast majority (**85%**) of its real estate related transactions outside of the black American Neighborhoods in the majority Anglo neighborhoods in the Anglo Zip Codes and less than 5% in the majority neighborhoods of the protected class of black Americans ----this practice has the disparate impact on the protected class of black Americans in the black American Neighborhoods

Pursuant to its responsibilities under the **FHA Final Rule** **SunTrust Bank** is legally obliged to provide the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Bank's legitimate substantial nondiscriminatory interest and that these interests – where legitimate –

could not be achieved by another practice with a less discriminatory effect – and to otherwise legally justify this overwhelming stark and glaring disparity and denial of equal real estate related transactions in the neighborhoods of the protected class of black Americans?

Should the **CRA Protest Complaint** investigation find from the evidence that the policies, action and practices of **SunTrust Bank** in home mortgage lending has a disproportionate discriminate effect on the protected class of black Americans and establishes the case for illegal discrimination pursuant to the **Effects Test**; forms the case for illegal discrimination in residential real estate related transactions in violation of **Section 805** and **Section 804 (a)** of the **Fair Housing Act**; forms the case for illegal discrimination against applicants for credit transactions in violation of the **ECOA** and forms the case for violation of the holdings in the governing case of **US V Chevy Chase FSB**.

That where **SunTrust Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests that the **Illegal Discrimination Claim** is certified as true and that it be notated in the official investigation report that in the equal marketing, soliciting and making of home mortgage loans between the Anglo neighborhoods in the Anglo Zip Codes and the black neighborhoods of the protected class of black Americans that **SunTrust Bank – is in violation of the ECOA and FHA Final Rule**

Working Capital Loans

The Claim states that **SunTrust Bank** is engaged in illegal discrimination in the marketing, promotion and making of its Working Capital Loans and has placed 95% of its Working Capital lending outside of the black American Neighborhoods. This practice has the disparate impact and the disproportionate discriminate effect on the protected class of black Americans

Should the deep, wide Color of Money **CRA Protest Complaint** Investigation find from the evidence that **SunTrust Bank** has failed and refused to promote, market and to **make** the Working Capital Loans available to the businesses in the neighborhoods of the protected class of black Americans and has made 99% of its Working Capital Loans to the business neighborhoods in the Anglo Zip Codes – with reckless disregard for the rights of the protected class of black Americans in the black American Neighborhoods in the specified Zip Codes – this practice has the disparate impact and the disproportionate discriminate effect on the protected class of black Americans.

Pursuant to its responsibilities under the FHA Final Rule **SunTrust Bank** is legally obliged to provide the legally sufficient justification to prove that this practice challenged

in the Complaint is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests and that these interests – where legitimate – could not be achieved by another practice with a less discriminatory effect – and to otherwise justify this stark, and glaring disproportionate disparity between the two sets of Zip Codes with respect to working capital loans?

Should the banking **CRA Protest Complaint investigation** find from the evidence that this action and practice in **SunTrust Bank** making available its **Working Capital Loans** and its vast majority placement in the businesses of the Anglo neighborhoods with no corresponding equal Working capital Loans made to the businesses of the protected class of black Americans has the disproportionate discriminate effect on the protected class of black Americans and forms the prima facie case for illegal discrimination pursuant to the **Effects Test**, forms the case for illegal discrimination with respect to credit transactions in non-compliance with and in violation of the **ECOA** and forms the case for violation of the holding in the governing case of **US V Chevy Chase FSB**

That where **SunTrust Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests that overcomes the statutes and laws cited above – that the **Illegal Discrimination Claim** of denial of equal **Working Capital Loans** made between the two sets of Zip Codes is certified as true and that it be notated in the official investigation report that in the equal Promotion, Marketing and Making of Working Capital Loans between the businesses in the neighborhoods in the two sets of Zip Codes in Houston that **SunTrust Bank** –the Illegal Discrimination Claim stands and the Bank is in violation of the ECOA and FHA – Final Rule.

Bridge Loans

The Complaint states that **SunTrust Bank** has denied the Equal marketing, promotion and making of the Bridge Loans to the individuals and businesses of the protected class of black Americans and that this continuing practice has the disparate impact and disproportionate discriminate effect on the protected class of black Americans.

Should the deep, wide Color of Money **CRA Protest Complaint** Investigation find from the evidence that **SunTrust Bank** has failed and refused to promote, market and to **make** the Equal Bridge Loans available to the businesses in the neighborhoods of the protected class of black Americans and has made 99% of its **Bridge Loans** to the business neighborhoods in the Anglo Zip Codes – with reckless disregard t for the rights of the protected class of black Americans in the black American Neighborhoods in the specified Zip Codes where SunTrust bank does business.

SunTrust Bank is legally compelled pursuant to its responsibilities under the FHA Final Rule to provide the legally sufficient justification to prove that this practice challenged in

the Complaint is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests – and that these interests- where legitimate – could not be achieved by another practice with a less discriminatory effect – and to otherwise legally justify this stark, and glaring disproportionate disparity between the two sets of Zip Codes with respect to Bridge loans?

Should the **CRA Protest Complaint** find from the evidence that this action and practice in **SunTrust Bank** making available its **Bridge Loans** and its vast majority placement in the businesses of the Anglo neighborhoods with no corresponding equal Bridge Loans made to the businesses of the protected class of black Americans has the disparate impact and the disproportionate discriminate effect on the protected class of black Americans and forms the prima facie case for disparate impact under the FHA Final Rule and for illegal discrimination pursuant to the ECOA **Effects Test**, forms the case for illegal discrimination with respect to credit transactions in non-compliance with and forms the case for violation of the controlling authority in the governing cases of *US V Hudson City Savings Bank* and **US V Chevy Chase FSB**.

That where **SunTrust Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests – that overcomes the statutes and laws cited above – that the **Illegal Discrimination Claim** of denial of equal **Bridge Loans** made between the two sets of Zip Codes is certified as true and that it be notated in the official investigation report that in the equal Promotion, Marketing and Making of Bridge Loans between the businesses in the neighborhoods in the two sets of Zip Codes where SunTrust dos business that **SunTrust Bank** – is in violation of the ECOA and FHA – to include the Final Rule

Claimant petitions that where the independent Agency investigation by **The FRB- pursuant to its sworn duties** finds that the policies, actions and practices of **SunTrust Bank** has the disparate impact under the **FHA Final Rule** and the disproportionate discriminate effect on the protected class of black Americans pursuant to the ECOA **Effects Test** and/or has the Disparate Impact and Disparate Treatment and/or is illegal discrimination perpetrated against the protected class of black Americans and where **SunTrust Bank** fails to answer the **Illegal Discrimination Claims** directly as in legally sufficient justifications and **fails to refute the Claims with evidence** and with the whole truth - that **The FRB-** take the following actions with respect to **Claimant Banking Complaint** –

--that the **SunTrust Bank** CRA Rating be downgraded to **Needs To Improve** and that any and all applications be denied pending the “raising” of the CRA Rating

--that the Claimant be granted a full hearing to present the just cause for the **SunTrust Bank** CRA Rating to be downgraded to "Needs To Improve"

--that the Merger Application submitted by **SunTrust Bank** be taken out of expedited processing and be placed in indefinite suspension pending the full investigation into the CRA Protest Complaint by the FRB

--that the **Merger Application with BB&T Bank** submitted by **SunTrust Bank** be denied with no possibility of re-application until **SunTrust Bank** establishes full and favored presence in the black American Neighborhoods in the black American Neighborhoods in the metropolitan assessment areas where SunTrust does business – and fully resolves all of the outstanding Claims in Claimant's complaints and pending findings from the investigations

--that **SunTrust Bank** be barred from submitting any Bank Applications – expansionary or otherwise – to the **Federal Reserve Bank** unless and until the Bank has made the broad remedial measures as called for by the **Fair Housing Act** for the full reclamation of equal rights denied to the protected class of black Americans – Robust Capitalized Measures (RCM) and gets in compliance with the banking laws to include the FHA Final Rule

--that the **corrective Fines**- minimum **\$500 Million Dollars** be imposed on **SunTrust Bank**

--that **Cease and Desist Orders** be imposed on **SunTrust Bank** to correct, fix and end the continuing practices and actions (and –non-actions) that continue the pattern of disparate impact and disproportionate discriminatory effects on the protected class of black Americans in Houston MSA and in Dallas Texas markets

--that the **Sanctions, Penalties, Monitoring** be imposed against **SunTrust Bank** at the **FRB level**

--that the case be referred to the **Department of Justice –Civil Rights Housing and Civil Enforcement for full civil actions**

--that the case be referred to the **Department of Housing and Urban Development** for civil actions

Totality of Policies and Practices

Should the deep, wide, Color of Money **CRA Protest Complaint and banking complaint investigation** find from the evidence data that the **totality** of the policies, actions (and non-actions) and practices of **SunTrust Bank** pursuant to the Illegal Discrimination Claims outlined by Claimant constitute:

-a pattern and practice that the practices and actions (and non-actions) of the Bank manifests **disparate impact** and disproportionate **discriminate effect** on the protected class of black Americans

--a pattern of resistance to full enjoyment of rights of the protected class of black Americans secured by the **CRA, ECOA, Fair Housing Act – to include the Final Rule, Title VIII 1968 Civil Rights Act**

--a pattern that denies these equal rights to the protected class of black Americans

--a pattern of violations and non-compliance of the **CRA, FHA – to include the Final Rule, ECOA, FTC Act, HMDA – Section 5, Federal Reserve Regulation B, Title VIII of the 1968 Civil Rights Act, Equal Protection Clause – 14th Amendment – US Constitution** and of the rulings in the governing case of **US V Chevy Chase FSB**

Where **SunTrust Bank** fails to provide the legally sufficient justification to prove that the practices challenged in the **Illegal Discrimination Claims** are necessary to achieve one or more of its legitimate substantial nondiscriminatory interests justify the stark and glaring realities – geographical and otherwise- of its policies, actions and practices that result in the disparate impact and in the disproportionate discriminate effect on the protected class of black Americans **inside** of the 25 specified Zip Codes in Dallas as outlined in Claimants' **Illegal Discrimination Claims** – that the Illegal Discrimination Claims stands and are certified as true by the Agency – and that the broad remedial enforcement actions be imposed against **SunTrust Bank**.

In The Relentless Pursuit of Justice,

Barry Simmons

Renaissance Indexes Group

Chairman / RIG

7000 Fonvilla – Suite # 2310
Houston, Texas 77074

(713) 294-0570
rendexes@gmail.com



March 28, 2019

**FOR YOUTH DEVELOPMENT®
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY**

To Whom It May Concern,

I am writing on behalf of Y-CAP, the YMCA of Middle TN's Community Action Programs in Nashville/Davidson County in support of one of our partners, SunTrust Bank and in support of their proposed merger with BB&T. Annually Y-CAP provides academic and enrichment programs to 1200 at-risk students from kindergarten through high school at no cost to them. Bridging school, faith and family, we help students achieve the brightest future possible by closing the opportunity gap.

We depend on donors and volunteers to make this possible. Donors and volunteers like the employees at SunTrust.

Currently SunTrust Commercial Relationship Manager Jane Melrose and former SunTrust Vice President Kim Hamner are on our board and serve as effective liaisons to the company and other community partners. More than 40 SunTrust employees volunteered over 60 hours at Y-CAP in 2018; taking part in the financial simulation, *On My Own*, participating in our professional networking events, Y-CAP's Power Lunch and donating their time individually to visit, encourage and inspire students.

The SunTrust Foundation has also provided critical financial support for YCAP. Funds from the SunTrust Foundation have underwritten financial literacy education for underserved and at-risk Nashville youth for three years. In 2018, the SunTrust Foundation supported Y-CAP's integration of financial literacy into a larger focus on career readiness and workforce development for high school students. This broader focus allows Y-CAP students to apply skills gained to crucial real-life workplace situations and become more prepared for success after high school.

We are very grateful to the leadership and employees at SunTrust for their support; hundreds of students and their families in our programs have benefited from this partnership in the past and we are hopeful the connection continues well into the future.

Sincerely,

Beverly Revo
YMCA YCAP Philanthropy Executive

1021 Russell Street
Nashville, TN 37206

brevo@ymcamidtn.org

615.473.1359

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PRESIDENT EMERITUS
Harve A. Mugar



April 1, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

Sent via electronic email to comments.applications@rich.frb.org

Dear Sir or Madam:

On behalf of United Way of Miami-Dade, I am pleased to write in support of the work SunTrust Bank does in our community. Celebrating a 25-year ongoing partnership, SunTrust and its local leadership have been involved with, and supportive of, our work to strengthen the education, financial stability and health of our Miami community.

Of note, I'd like to highlight how our organization, and our community, benefits from SunTrust's expertise in financial services through their involvement in a program designed for "unbanked" and "underbanked" individuals and families in Miami. Supportive since its inception, a SunTrust local executive is now involved in helping develop a financial literacy curriculum for young children served by Early Head Start programs and part of Miami Dade County Public Schools. By starting young, we aim to strengthen the financial literacy of our diverse community where 6 out of 10 households struggle daily to make ends meet.

We are also fortunate to count on local SunTrust leadership on our Board of Trustees and Finance & Administration Committee.

We are hopeful that the proposed merger between SunTrust Bank and BB&T will continue to strengthen the communities served by these organizations, following the model well established in our community by SunTrust.

Should you have any questions, or need additional information, please do not hesitate to reach out.

Best personal regards,

Maria C. Alonso
President and CEO

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Federal Reserve Bank of Richmond
PO Box 27622
Richmond, VA 23261

Subject: SunTrust Bank Merger Application Comments

Please allow me to introduce myself as the owner and CEO of MERRICK Industries, Inc. We are a 111-year old company; a family-owned industrial weighing manufacturing business with 150 employees and customers all over the world. MERRICK has appreciated a long and positive relationship with SunTrust as our bank partner for over a decade.

I appreciate your interest in receiving comments regarding the SunTrust merger application with BB&T. From my point of view as a longstanding client, I wholeheartedly support this merger as it will benefit both customers and shareholders. Both banks have built excellent reputations across financial responsibility and community investment. By joining forces, the combined entity will gain from each other's strengths, while realizing more operating efficiency through economies of scale. Competition in the industry is fierce. This merger will allow the new, larger bank to sustainably provide financial services with greater productivity and value to clients. At the same time, I believe the past commitment to community will continue. SunTrust has been an exemplary presence in our local area by helping people through related causes. This goes far beyond the good that is provided through monetary donations. SunTrust has long supported their employees to give generously to our community with time and personal involvement.

SunTrust has been a valued partner for our company, through both good times and bad. We have relied on loans and credit to finance our projects and growth. But we have also benefitted from the many personal relationships which have earned great trust by assisting us in areas of strategy, operating costs, and compliance. By adding more knowledge, products, and experiences from BB&T, I expect the new combined bank to provide even better service and community contributions for many years to come.

Best Regards,

A handwritten signature in black ink, appearing to read "Joe K. Tannehill, Jr.", with a flourish at the end.

Joe K. Tannehill, Jr.
President & CEO

Eike, Kathy

From: Beth Gibson <beth@gibsonandassociatesinc.com>
Sent: Friday, March 29, 2019 4:36 PM
To: RICH BankSup Applications Comments
Subject: [External] BBT and SunTrust merger

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PLEASE NOTE: This email is not from a Federal Reserve address.
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As a member of the community, I am voicing my support for the BB&T and SunTrust merger. Both BBT and SunTrust are under penetrated in our area. After the merger with a larger platform, the entity will bring more products and services to our community. It will be a positive situation for the Bank and the community.

Bill Gibson
President
Gibson and Associates, Inc.
222 e. Intendencia St.
Pensacola, FL 32502

Sent from Mail for Windows 10



**Junior
Achievement**
of Middle Tennessee



Work Readiness | Entrepreneurship | Financial Literacy

Trent Klingensmith
President
Junior Achievement of Middle TN
120 Powell Place
Nashville, TN 37204

March 29, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

To whom it may concern,

I am writing in regard to the news of SunTrust Bank's merger with BB&T Bank. This is an exciting time as these two banks will combine to become America's premier financial institution. Both of these institutions have an impressive track record of investing in their surrounding communities and we are excited to see how they will combine their efforts to have maximum impact as an even more active community partner here in Middle Tennessee.

Our mission at Junior Achievement is to inspire and prepare young people to succeed in a global economy. Through diverse and highly tailored programming, we strive to help every child in the 22 counties of Middle Tennessee understand the unique value of who they are and to prepare them for a successful future. Our focus on financial literacy, workforce readiness, and entrepreneurship helps students draw the connection between what they learn in the classroom and their future success. We could not accomplish this mission without active engagement from our community partners and SunTrust Bank paints the picture of a perfect partnership.

A great deal of JA's success in Middle Tennessee is due to the engagement that we receive from SunTrust's leadership team and staff. Local President Scott Pullman has been engaged with our mission from day one and has been a driving force in getting members of the SunTrust team engaged through volunteering with our various programs for students of all socioeconomic backgrounds, particularly low income students who make up 47% of the 37,000 students we reach annually. Dorothy Cleaves, SunTrust's Community Development Manager, has also played a pivotal role in our mission and has



**Junior
Achievement**
of Middle Tennessee



Work Readiness | Entrepreneurship | Financial Literacy

helped secure the success of our future programs, most significantly JA Finance Park, for which SunTrust Foundation will hold the title sponsorship. JA Finance Park is slated to launch in late 2019 and will be geared toward helping students build a foundation upon which they can make intelligent financial decisions that last a lifetime, including decisions related to income, expenses, savings, and credit. We are very grateful for Dorothy's efforts in securing this sponsorship and for SunTrust Foundation's financial investment in the future of our local students. Carolyn Ermev, Director of Charitable Giving, has been an active participant in our mission by managing the day-to-day local foundation requests and support with annual operating needs. The local SunTrust team as a whole has been a pleasure to work with and has contributed significantly to the success of our mission here in Middle Tennessee.

We are extremely fortunate and incredibly grateful for the funding and manpower that SunTrust invests in our mission. Junior Achievement could not reach 37,000 students without the generous support of partners like SunTrust and we look forward to our continued partnership with them and the impact they will have on the students of Middle Tennessee for years to come.

Sincerely,

Trent Klingensmith, President



Memphis Jewish Federation | Jewish Foundation of Memphis

March 28, 2019

To Whom it May Concern:

I am honored to write a letter in support of the work of SunTrust in strengthening the Memphis community.

Our association with SunTrust began with a banking relationship and has grown into a partnership way beyond our financial transactions. They have been a sounding board and resource in helping us navigate our changing needs as our organization has grown; they have brought important technical expertise to conversations about ways to better serve our donors and streamline our processes; they have provided sponsorship support at leadership levels which illustrates, in a very visible way, their commitment to helping us achieve our mission.

We value our partnership with SunTrust and are confident that this will continue and flourish after their merger with BB&T.

Thank you for providing me with a platform to share our admiration and appreciation for SunTrust Bank.

Very sincerely yours,

Laura K. Linder
President/CEO



Eike, Kathy

From: Garry Friend <onefriend@comcast.net>
Sent: Tuesday, April 02, 2019 7:02 PM
To: RICH BankSup Applications Comments
Subject: [External] Merger

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With the Suntrust Business strength & the BB&T retail strength this could only be good for the consumer!

Sent from Mail for Windows 10



April 2, 2019

FDIC
Atlanta Regional Office
10 10th Street, NW, Suite 800
Atlanta, GA 30309-3849.

Dear Sir/Madam:

The Life Enrichment Center of Norfolk (LEC) and SunTrust Foundation have been working collaboratively in the Hampton Roads community since 2014. The Center's mission is to ensure that children who are reading below their grade level are reading proficiently by the third grade. Students who are proficient in reading by grade 3, are 4X more likely to graduate from high school and become productive citizens. The the LEC trains individuals from the corporate community, universities and colleges, law enforcement and the faith based community to help children excel in the area of literacy.

The literacy tutors support one child, one hour a week for one academic year. In addition to providing volunteer tutors to help children in Title I elementary schools, the Center also partners with businesses to help fund Technology and Literacy Labs in Title I elementary schools. SunTrust Bank has been a significant partner in this important endeavor. Over the past several years, the SunTrust Foundation provided the needed funding to purchase technology and other equipment needed for several Technology & Literacy Labs. The Center is currently serving in 24 Title I elementary schools in Hampton Roads, and at the start of 2019, we launched 2 new labs in the Richmond, VA. In Hampton Roads, the SunTrust Foundation funded 4 Technology and Literacy Labs and provided the financial support for the 2 new labs in Richmond. Over 5000 children have been impacted by the labs that are used daily by the schools. Additionally, the labs are accessible to the community during the evenings for various training, in particular, financial literacy workshops provided by SunTrust Bank employees.

Last year, the Life Enrichment Center was one of 36 nonprofit organizations to receive the SunTrust Foundation's "Lighting the Way Award" which was given to organizations who were actively involved in community outreach in their cities. The generous award allowed the Life Enrichment Center to significantly expand its literacy enrichment efforts in all of the Norfolk elementary schools. A special initiative which provided literacy

support to over 25,000 elementary students in Norfolk Public Schools was supported by the grant from the SunTrust Foundation.

Mark Johnson, Community Development Manager of the Hampton Roads region, has been our primary contact and has been instrumental in our growing partnership with the Bank as well as the entire Hampton Roads community. His hand-on approach, professionalism and real passion for impacting the community through a plethora of initiatives has been outstanding. Through his efforts, we have not only been able to utilize resources from SunTrust to advance the Center's mission, but he has also connected us with other organizations to support our joint efforts to make a difference in the lives of children and the communities and cities where they reside.

It is my earnest hope that the merger between SunTrust Bank and BB&T will expand its outreach to the various communities and cities that both banks currently serve. Cities and communities are being changed as individuals from underserved communities are receiving programs and initiatives which provide the support and equipping that leads to transformation, empowerment, and success.

I look forward to continued opportunities to partner with an expanded financial institution to transform communities and cities through the equipping of its citizens. Thank you for this invitation to share about the partnership with the SunTrust Foundation and the work that we have been able to achieve through a viable partnership with SunTrust Bank and Mark Johnson, the Bank's Community Development Manager.

To learn more about the Life Enrichment Center, please refer to the website: www.lecliteracy.org. You may also contact me at kturpin@lecliteracy.org or at 757-513-0902.

Sincerely,
Kevin H. Turpin
President

Eike, Kathy

From: Connie Lanzl <connie.lanzl@ja.org>
Sent: Tuesday, April 02, 2019 6:31 PM
To: RICH BankSup Applications Comments
Subject: [External] RE: Appreciation from Junior Achievement of Upstate SC re SunTrust as a community partner

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Forgive a second email. Just listened to both video links again and wanted to encourage you to listen to isolated parts where the commitment and impact of SunTrust Bank is clear:

on the YouTube [video of Alexander Elementary students](#): look at 7:15-7:40 and 7:59-9:15.

on the YouTube [video that features a SunTrust employee](#): look at 0-0:13; 0:48-1:06; 1:18-1:38; 2:13-2:23

Connie Lanzl | President

Junior Achievement Upstate SC

530 Howell Rd, Suite 103, Greenville, SC 29615

O 864.244.4017 | C 864.325.1455

connie.lanzl@ja.org

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Junior Achievement | **100 YEARS. 100% READY®**

Empowering young people to own their economic success since 1919.

From: Connie Lanzl

Sent: Tuesday, April 2, 2019 6:19 PM

To: 'comments.applications@rich.frb.org' <comments.applications@rich.frb.org>

Subject: Appreciation from Junior Achievement of Upstate SC re SunTrust as a community partner

Junior Achievement of Upstate SC is writing to express our appreciation to SunTrust employees for being outstanding partners for Junior Achievement both nationally and locally. Our mission is to "empower young people to own their economic success" in a global economy through experiential, real-world, volunteer-led programs focused on achieving financial literacy, developing entrepreneurship, and teaching workforce readiness skills. Over the past five years, 40 SunTrust employees from Greenville and Spartanburg counties in SC have delivered 61 Junior Achievement classes and empowered and inspired over 800 K-12th grade students in our public schools.

Last fall our local SunTrust Bank asked if there was an opportunity to volunteer for JA during SunTrust's national week of service. As it happened we did not have a program scheduled at that time but we saw this as an opportunity to approach Alexander Elementary, one of our neediest school where 100% of the children qualify for free and reduced lunch. We told the principal there that we had volunteers from SunTrust eager to make a difference in the lives of her children, and she welcomed us enthusiastically. On the morning of October 10, 21 SunTrust volunteers taught 128 students in 7 classes of all the 1st and 2nd graders. But the ripple effect of this day continued and hasn't stopped yet.

- 1) The principal was so impressed that she wants JA (and SunTrust employees) to return next year and teach even more grades.
- 2) We had an event in late October and we asked one of the SunTrust employees who had done such an outstanding job to appear in a video that we showed at that event, and to explain why SunTrust as an organization believes so strongly in the value of supporting its community with both funding and volunteers. She was outstanding!
- 3) The reception by Alexander Elementary was so enthusiastic that we asked the principal if she would be interested in bringing some of her students to that same event and expressing to our audience the impact that the volunteers and the JA curriculum had on her students. She said yes, the students were the hit of the program, and just as importantly, the principal was able to share the needs and vision of her school with a wider audience. The statistics that the principal shared about her students were sobering, including that 8% of them are homeless.
- 4) Follow this snowball effect:
 - As a result of SunTrust's commitment to volunteerism and their decision to partner with Junior Achievement of Upstate SC, we came to know and appreciate the challenges and efforts of Alexander Elementary.
 - We then gave Alexander a platform to tell their story.
 - We then found out that they needed volunteers to lunch with the majority of their students whose parents could not attend the "Thanksgiving Feast" in November, and we recruited over 30 volunteers.
 - We then learned that a "Book Bingo Night" in December was in need of new or gently-used books that could be given to their students to take home if they attended with a parent, and we and others collected well over 500 books.
 - Because of the networking in our relatively small community of people who have discovered the needs of Alexander through our JA classes, our event last October, the Thanksgiving Feast, and the book drive, members of the Downtown Greenville Rotary Club, the largest Rotary club in the state, met with the Alexander principal in March to learn how their members could help them realize their vision. That kind of partnership has the potential to make a huge difference at this school.

We thank SunTrust for partnering with us to create a win-win-win situation:

- Win for SunTrust in engaging their employees in a way that is rewarding for them individually and as an organization
- Win for Junior Achievement in enlisting SunTrust employees as wonderful volunteers as we seek to accommodate the demand for JA classes
- Win for students who receive a real-world curriculum that helps ensure their future economic success taught by superb role models who can convey not only the reality of financial institutions in general but the SunTrust culture in particular.

We commend you for the care and thoughtfulness that you take in seeking to add purpose to your organization and impact in the community and we thank you for including us as one of your partners.

(In case a picture or video is worth a thousand words, attached are several photos, at this link is the [video featuring Ladonna Manis from SunTrust](#), and at this link is the [video of Alexander Elementary students and their principal](#) who references the impact of SunTrust volunteers.)

Connie Lanzl | President

Junior Achievement Upstate SC

530 Howell Rd, Suite 103, Greenville, SC 29615

O 864.244.4017 | C 864.325.1455

connie.lanzl@ja.org

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Junior Achievement | **100 YEARS. 100% READY[®]**

Eike, Kathy

From: Lisa Kitei <lkitei@browardcenter.org>
Sent: Tuesday, April 02, 2019 5:18 PM
To: RICH BankSup Applications Comments
Cc: Sackman.Shawn
Subject: [External] In Support of SunTrust

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Since before it even opened its doors in 1991, the Broward Center for the Performing Arts has been able to count on SunTrust Bank as a partner in all of its major initiatives designed to build community through the arts and further the cultural and economic development of the South Florida community. Robert “Buddy” Lochrie Jr., former president of SunTrust Bank in Broward County and vice chairman of SunTrust, served as the founding chair of the Broward Performing Arts Foundation, the independent 501(c)(3) organization established in 1985 to raise the private funding necessary for the Broward Center’s construction and establish an endowment that would sustain its facilities and activities. Lochrie continued to serve as chairman of the board for more than 20 years and was instrumental in the Broward Center’s growth to a world-class performance venue serving more than 700,000 community members each year, including more than 150,000 K-12 students and a significant number of low-to-moderate income households. Long-time SunTrust executive Margaret Callihan and Broward County Market President Shawn Sackman have also made a significant impact in their respective terms as board members, with Sackman currently in the second year of his term. Most recently, in 2019, SunTrust made a significant gift to support the capital renovation of the iconic Parker Playhouse, which the Broward Center has managed since 2005. In addition to providing philanthropic support and leadership, SunTrust Bank also serves as the primary bank for both the Broward Center and the Broward Performing Arts Foundation, and the Foundation also holds an \$11 million endowment account with SunTrust’s Institutional Division. SunTrust, in conjunction with BB&T, provided the construction loan for the \$59-million ENCORE! Capital Campaign to renovate and expand the Broward Center, which was completed in 2014. SunTrust Bank’s partnership on every level has had a tremendous impact on the Broward Center’s success for more than 28 years, and their support helps us continue to provide dynamic artistic experiences for audiences, inspiring education programs for youth and increasingly open access to cultural resources for all.

Lisa Kitei | President
Broward Performing Arts Foundation

Broward Center for the Performing Arts
201 SW 5th Avenue | Fort Lauderdale, FL 33312
Phone: 954.468.3297 | Fax: 954.468.2680
lkitei@browardcenter.org | BrowardCenter.org

Eike, Kathy

From: M Krocker <michellekrocker@gmail.com>
Sent: Tuesday, April 02, 2019 3:04 PM
To: RICH BankSup Applications Comments
Subject: [External] Comments in Support of the Proposed Transaction between BB&T and SunTrust Banks

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I am writing in support of the proposed merger of BB&T and SunTrust banks.

Their commitment to investing in low-income and minority communities and financing affordable housing development will be enhanced with joint operations and management. Both institutions have been long-time supporters of our work in the community, serving low and moderate income households throughout the Northern Virginia suburbs.

Thank you for the opportunity to comment.

--

Michelle Krocker | Executive Director

571.572.2238 (office)
703.919.0049 (mobile)
www.nvaha.org



Northern Virginia Affordable Housing Alliance

Expanding political will to make affordable housing a regional priority

Eike, Kathy

From: Matt Packey <packeym@queens.edu>
Sent: Tuesday, April 02, 2019 1:58 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Subject: [External] SunTrust BB&T Merger - community support

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Hello

I wish to offer my input related to SunTrust and the proposed merger with BB&T.

As an officer of the not-for-profit Queens University or Charlotte I have had occasion to work with and observe both SunTrust and BB&T in our Charlotte community.

Both have been supportive of our mission here at Queens – which is to provide transformative educational experiences that prepare individuals for purposeful and fulfilling lives. Our motto – “to serve, not to be served” is central to the experiences we provide to our students and we work to deliberately engage our students in activities that give them the opportunity to serve as well. We could not fulfill our mission, or live our motto without support from organizations such as SunTrust and BB&T. Not only have they supported Queens philanthropically, but when they have entered into commercial/business transactions with us they have done so with an eye toward supporting what we are doing as an institution. They seek an understanding of what is important to us and find ways to support our efforts. They recognize that our success means that our students are better prepared, enabled through more experiences and prepared to be citizens who will make a difference. A merger of those institutions would serve Charlotte well, build upon their independent foundations and in turn strengthen our community.

I hope this is helpful to you.

Best regards

Matt

Matt Packey
CFO and VP for Administration
Queens University of Charlotte
704-337-2375



ACT!

April 2, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

RE: SunTrust and BB&T Merger

Federal Reserve Board,

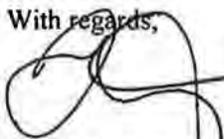
It is with great honor that I write this letter in support of the merger between BB&T and SunTrust. Our history with SunTrust runs deep. We are a small CDFI in Albany, Georgia. I can truly say that without the assistance and support of SunTrust, Albany Community Together, Inc. would not be in existence. In 1994, Albany Georgia suffered from the torrential rains of tropical storm Alberto. Tropical Storm Alberto was the costliest and first named storm of the 1994 Atlantic hurricane season. Devastating Southwest Georgia, a number of homes and businesses suffered extensive impact, with up to several million dollars in many. SunTrust along with three other local banks answered the call by providing startup capital to form a revolving loan fund to support those businesses affected by the storm. That loan fund is known to today as ACT! Albany Community Together, Inc. Without the initial startup capital, board presence, and management expertise of SunTrust, ACT! would not be able to provide the much-needed access to capital to our small business community today. ACT! most recently received the Lighting the Way Award from SunTrust that provided capital to continue to serve our small business community, twenty-five years after our initial partnership, SunTrust and ACT! continues to make a difference in the community we serve. SunTrust is vital to the small business health in Albany, Georgia.

I would be remiss if I did not mention the support of BB&T to the CDFI community. Even though BB&T did not have a physical branch presence in our community, we have benefited from their generosity to support economic development through BB&T's Community Development Capacity Building program in partnership with the National Development Council. I personally have benefited from the ability to become a Certified Economic Development Finance Professional with the assistance of BB&T. In 2018, we were fortunate enough to receive support from BB&T with capacity building efforts. Our business development officer became a Certified Economic Development Finance Professional.

The merger of SunTrust and BB&T marries two institutions that have a proven record of accomplishment of assisting those in need when no one is looking. It is become our long-standing history with both institutions, that I can support this merger. I know that there are only better and bigger things to come for those of us who are in the trenches working to make a difference in our underserved communities.

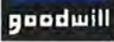
I may be reached at (229) 420-4600 or (229) 343-0182 or by email at: thelma.johnson@albanycommunitytogether.com. I am proud to support SunTrust and BB&T merger.

With regards,



Thelma Adams Johnson, President/CEO
Albany Community Together, Inc.

Goodwill

Industries of the Valleys 

April 2, 2019

Federal Reserve Bank of Richmond
PO Box 27622
Richmond, VA 23261

RE: Support for the SunTrust and BB&T Merger

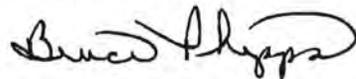
Dear Members of the Federal Reserve Bank of Richmond,

I am writing this letter voicing my strongest support for the merger of the SunTrust and BB&T Banks. Our organization has had a long positive history with both institutions as a banking partner and contributor to the mission of Goodwill Industries of the Valleys. They have both demonstrated a deep level of commitment to serve the many communities in our region of Central and Southwest Virginia.

As is the case with most non-profits, Goodwill Industries of the Valleys is dependent on an active level of community engagement and support. In the past we have had members from SunTrust serve on our Board of Directors, act as financial advisors and provided needed funding (loans and grants) that allowed us to execute on our mission and business interests. We are thankful for their continued support and their plan, through this merger, to be an even more active community partner.

I trust that this endorsement will be received with a positive outcome towards merger.

Respectfully,



Bruce Phipps
President and CEO

www.goodwillvalleys.com

Roanoke Jobs Campus &
Support Center
2502 Melrose Avenue, NW
P.O. Box 6159
Roanoke, VA 24017
Office: (540) 581.0620
Fax: (540) 581.0629

Madison Heights Jobs Center
174 River James Shopping Center
Madison Heights, VA 24572
Office: (434) 200.9920
Fax: (434) 845.3632

Radford Jobs Campus
103 Duncan Lane
Radford, VA 24141
Office: (540) 639.9027
Fax: (540) 639.3517

Rocky Mount Office
1045 North Main Street
P.O. Box 157
Rocky Mount, VA 24151
Office: (540) 483.0296
Fax: (540) 483.0297

Staunton Jobs Campus
1106-C Greenville Avenue
Staunton, VA 24401
Office: (540) 886.2001
Fax: (540) 886.7112



Eike, Kathy

From: Don Oglesby <DOglesby@HomesofHope.org>
Sent: Monday, April 01, 2019 7:51 PM
To: RICH BankSup Applications Comments
Subject: [External] SunTrust and BB&T merger comments

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Both banks have always been SUPER involved in community involvement and investment. I think this merger will be great and will benefit many more people especially in the communities where CRA emphasis is made! We are BIG fans of both banks and support this merger!!

With regards for your peace,



Don Oglesby
President/CEO, HDFP, EDFP
Homes of Hope, Inc.
(864) 546-4637
www.homesofhope.org



Donate today [HERE](#)



April 1, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

To Whom It May Concern,

I am writing in support of the proposed merger of SunTrust with BB&T.

Board of Trustees

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Bala Iyer
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David Gonzalez
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Faye Steinhauser

Project Prosper
13575 58th Street North
Suite 107
Clearwater, FL 33760

(o) 727-538-4179
(d) 727-266-0816
(f) 727-264-0816
www.ProjectProsper.org

Project Prosper is a grassroots, volunteer-driven organization based in Clearwater, FL that strives to provide financial integration services and resources that empower immigrants and refugees to achieve financial stability. Through 2 programs, Financial Literacy group classes and the Loan Program, Project Prosper supports immigrant clients, who are overwhelmingly low to moderate income, in their transition into life in the United States.

In pursuance of our mission, SunTrust has been a supportive partner and together we have cultivated a long-standing, multi-dimensional relationship. In addition to regularly providing financial support, SunTrust staff volunteer with Project Prosper to teach group Financial Literacy classes directly to clients. Our clients, who are just learning about how the complex American financial system works and often do not know who gives trustworthy information, find opportunities to ask questions of experts in financial fields to be very valuable.

SunTrust has shown a strong commitment to supporting the financial needs of low and moderate income individuals in the Tampa Bay Area. Project Prosper has every reason to believe the merger in discussion will continue the strong track record of support for organizations like ours that serve low- income communities.

If I can be of assistance, please call on me directly at 727-266-0816.

Sincerely,

Faye Steinhauser
Executive Director
Project Prosper, Inc.

Eike, Kathy

From: Angie Bonfardino-Walasek <angie@unitedwayhernando.org>
Sent: Monday, April 01, 2019 3:11 PM
To: RICH BankSup Applications Comments
Cc: Ted Granger
Subject: [External] SunTrust Partnership Letter

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Good afternoon partners and friends,
??

United Way of Hernando County is beyond grateful for the relationship our local SunTrusts have helped create over the years. SunTrust's support simply does not stop at their annual financial pledges, but they truly exemplify the meaning of what it is to LIVE UNITED. Between volunteering their personal time for local events to advocating for United Way's financial stability initiatives, our collaborative efforts have proven to be most impactful on a localized and personal level for residents who need us the most. SunTrust hosted two volunteer teams this year where they competed in United Way's KICK Start to Early Literacy Kickball Tournament in support of free books for pre-school children. Success stems from leadership, and it speaks volumes of the culture of volunteerism and overall support SunTrust has created with their associates and within the communities they live, work & play in.

Thank you SunTrust for your continued support, trust, and shared vision for financial stability.
??

Should you like additional information on the wonderful work this partnership has created, please do not hesitate to contact me directly. Thank you.

??
Angie Bonfardino-Walasek | Executive Director/CEO

United Way of Hernando County | 4028 Commercial Way Spring Hill, FL 34606

phone: 352.688.2026 | fax: 352.688.8336

www.UnitedWayHernando.org

YOU LIVE HERE. | YOU GIVE HERE. | IT STAYS HERE. | LIVE UNITED

**If every resident did their part and gave just one dollar...
That would be over \$180,000 invested back into
the community to do some serious good!**

UnitedWayHernando.org/Dollar Join the Movement, click here!



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??

Eike, Kathy

From: Lee Wilson <lwilson@agingtrue.org>
Sent: Monday, April 01, 2019 1:44 PM
To: RICH BankSup Applications Comments
Subject: [External] SUNTRUST BANK - UPCOMING MERGER WITH BB&T

Importance: High

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To Whom It May Concern,

Please be advised that I am more than delighted to commend SunTrust Bank to the Federal Reserve Bank of Richmond for every favorable consideration of their application to merge with BB & Trust. We have been an extremely satisfied client, customer, and business partner of SunTrust Bank here in Jacksonville, Florida for many years now, and we very much look forward to continuing that relationship with their new, stronger entity post-merger. I would be happy to speak with you in person, if you so desire, to give you more detail about the excellent job SunTrust has done for me and my agency in a variety of ways over the years.

Sincerely yours,



Lee Wilson, CPA
Chief Financial Officer
Aging True - Community Senior Services
4250 Lakeside Drive, Suite 116
Jacksonville, Florida 32210
Main: 904-807-1203
Direct: 904-807-1262
Fax: 904-807-1351
Mobile: 904-562-0561
Website: www.agingtrue.org
Email: lwilson@agingtrue.org

"Providing essential and innovative services and care for individuals, families and communities throughout Northeast Florida to prepare for and support graceful aging."

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Asst. Chief Jimmy Judge
Jacksonville Sheriff's Office

Janice Lowe
The Jacksonville Landing

Vince McCormack
Perdue Office Interiors

Ryan McIntyre
Vystar Credit Union

Bill Prescott
Heritage Capital Group

John Ream
The Connect Agency

Dawn Southworth
Omni Jacksonville Hotel

Kerri Stewart
JEA

Chief Don Tuten
Jacksonville Sheriff's Office

Aundra Wallace
JaxUSA Partnership

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 27622
comments.applications@rich.frb.org

Federal Deposit Insurance Corporation (FDIC)
Atlanta Regional Office
10 10th Street NW, Suite 800
Atlanta, GA 30309-3849
BankMergerApplication@fdic.gov

RE: Public File of Application to Merge: SunTrust Bank and BB&T

Dear Leadership of FRB and FDIC,

I am writing to show my support for the work SunTrust Bank and BB&T Bank are doing in our community of Jacksonville, Florida, including Downtown Jacksonville.

At Downtown Vision, we are dedicated to making Downtown Jacksonville a better place to live, work, visit and invest. We work with the City of Jacksonville, downtown property owners and downtown stakeholders, to promote "DTJax" and realize our vision for a dynamic, 24-hour pedestrian Downtown that serves as the premier center for the arts, dining, retail, entertainment, business and urban living in Northeast Florida. We work together with numerous corporate, non-profit and community partners in our mission.

Both SunTrust and BB&T have been strong community partners in Jacksonville, supporting a wide range of important issues. We are excited for these two strong institutions to join forces to continue to support our Jacksonville community together. Both SunTrust and BB&T regional offices are headquartered in Downtown Jacksonville, and we are thrilled they will remain here as dedicated anchor institutions.

SunTrust has been active in the Jacksonville community with a focus on financial education, counseling, career readiness, small business and entrepreneurship. From supporting our local University of North Florida for the launch of their Small Business Transition Institute, or grants to the PACE Center for Girls and their financial literacy program, their investments continue to assist our community, improve the lives of our residents and make our city better.

BB&T Bank has also made significant investments in our Jacksonville community, including education, community and economic development. In Downtown, BB&T has supported our growing Social Services Outreach Program, which helps both

***Downtown
Vision,
Incorporated***

the low-income individuals in Downtown, as well as the economic vibrancy of businesses here.

Overall, both of these banks are treasured local partners for Jacksonville and for Downtown Jacksonville. We greatly appreciate their work -- both in the economic growth of our city, and in their community work and partnerships for a better Jacksonville, Florida.

Thank you for your willingness to receive these comments in your due diligence process on this merger. Please don't hesitate to reach out to me if I can be of more assistance.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'J' and 'G' followed by a long horizontal line extending to the right.

Jacob A. Gordon Esq.
CEO
Downtown Vision Inc.
214 N. Hogan Street, Suite 120
Jacksonville, FL 32202
904.634.0303
www.downtownjacksonville.com



1350 Concourse Avenue, Suite 451
Memphis, TN 38104

April 1, 2019

To whom it may concern:

A Step Ahead Foundation is an eight year old non-profit with the goal of ensuring that every woman in Memphis has access to free, long-acting, reversible contraception (LARC) and to ensuring that she is educated about her body, encouraged to achieve her goals, and knowledgeable about her options of preventing an unplanned pregnancy. We also have affiliates in Nashville, Jackson, Chattanooga, Knoxville and soon, Tri-Cities.

We have used Suntrust for our operating account for many years and have been pleased with their service. Additionally, Suntrust has provided monetary support for A Step Ahead on numerous occasions. We are pleased to submit this letter of support for the merger of Suntrust and BB&T. We are confident that the two institutions together will continue Suntrust's history of philanthropy for our community.

Please feel free to contact me at 901-729-7044 or nikki@astepaheadfoundation.org should you have any questions or need further information.

Sincerely,


Nikki Gibbs, Executive Director
A Step Ahead Foundation

We bring people and resources together
to solve problems too big for any of us to solve alone.



April 4, 2019

Federal Reserve Bank of Richmond
PO Box 27622
Richmond, VA 23261

Dear Committee Members,

We are honored to speak to the support and community impact provided to us through the SunTrust organization and their employees.

Over the past several years SunTrust has proven to be a constant and dedicated partner in addressing the needs of our local community. Since 2013 the organization and employees have contributed nearly three-quarters of a million dollars to meet the needs of their neighbors and clients. In the past year alone, funds raised by employees have improved the odds for over three thousand at risk children through promoting early child development, literacy and high school graduation. Funding has supported 770 veterans, active duty military and families who needed assistance to get back on their feet.

Through community relations and employee engagement SunTrust sets the standard for education and volunteer engagement at all levels and we commend them for their dedication. Partners of the caliber are not easy to find and are greatly appreciated.

Best,

A handwritten signature in blue ink that reads "Carol McCormack".

Carol McCormack
President & CEO

Eike, Kathy

From: Steve Gilbert <sgilbert@cisjax.org>
Sent: Thursday, April 04, 2019 10:32 AM
To: RICH BankSup Applications Comments
Subject: [External] FW: SunTrust support

NONCONFIDENTIAL // EXTERNAL

PLEASE NOTE: This email is not from a Federal Reserve address.
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Good morning,

On behalf of Communities In Schools (CIS) Jacksonville, I am submitting this letter of support for SunTrust Bank. The non-profit community in Jacksonville, has been blessed to have such a strong banking partner in our city.

SunTrust has been an active and vested community companion. As COO of Big Brothers Big Sisters of Northeast Florida for 7 years, and now as the CEO of CIS the past 5 years, I have seen first hand the value the bank plays in investing in our great community. SunTrust has been committed over the years to making Northeast Florida a better place to live and work.

The important work our organization does within the Duval County Public Schools serving at-risk students, especially with our literacy initiative, has been supported by the bank. SunTrust has invested in our effort to improve the school drop-out rate and increase our local high school graduation.

All of the non profit leaders in Jacksonville are excited about the merger of SunTrust with BB&T to become one of our nation's premier institutions. We trust the merger will bring even more opportunities to support the wonderful work that is being done each day by our local non-profit organizations.

Thank you.

Best wishes,

Steve Gilbert
CEO, CIS Jacksonville

Steve Gilbert | Chief Executive Officer
Communities In Schools of Jacksonville



P: 904.344.3900 ext. 105
E: sgilbert@cisjax.org
6261 Dupont Station Court East
Jacksonville, FL 32217

www.cisjax.org | [Blog](#) | [Twitter](#) | [Facebook](#)

Eike, Kathy

From: Allison Watkins <awatkins@ymcavbr.org>
Sent: Thursday, April 04, 2019 9:53 AM
To: RICH BankSup Applications Comments
Subject: [External] SunTrust

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To Whom it May Concern:

SunTrust has been a valuable partner to the YMCA of Virginia's Blue Ridge during a multi-decade banking relationship. SunTrust's staff has been responsive and served as wise advisers through many business decisions made by our 501c3 organization.

SunTrust has also been a financial supporter of the good work that the YMCA of Virginia's Blue Ridge does to strengthen our community with a focus on healthy living, youth development, and social responsibility.

Sincerely,

--

Please note that my email has been changed to awatkins@ymcavbr.org.

Allison Watkins
Chief Financial Officer
YMCA of Virginia's Blue Ridge
520 Church Ave., Roanoke, VA 24016
(P) 540.527.9622 x.3104
(E) awatkins@ymcavbr.org

Eike, Kathy

From: Dale Mullennix <dmullennix@urbanministrycenter.org>
Sent: Thursday, April 04, 2019 9:52 AM
To: RICH BankSup Applications Comments
Subject: [External] Support for SunTrust Bank

NONCONFIDENTIAL // EXTERNAL

PLEASE NOTE: This email is not from a Federal Reserve address.
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As the Executive Director of the Urban Ministry Center in Charlotte, I would like to share my words of support for SunTrust Bank in its new endeavor with BB&T.

SunTrust partnered with us to acquire funding from the Federal Home Loan Bank to help us build a permanent supportive housing facility to house 120 formerly homeless individuals. This facility, called Moore Place, has become national model for housing the homeless and reducing costs to the community at large. SunTrust has continued as a supporter and partner with the Urban Ministry Center through a line of credit and charitable gifts to provide needed services for the most vulnerable members of our community.

Thank you for this opportunity to affirm our support for SunTrust Bank.

Dale Mullennix

Dale Mullennix
Executive Director
Urban Ministry Center
704 926-0619
www.urbanministrycenter.org

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President & Secretary**
Steve Sally

Our Mission
To increase the organized
capacity of our
community
to care for its people.

April 4, 2019

To whom it may concern:

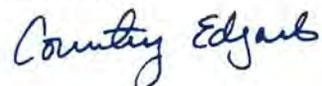
I am writing to express my sincere gratitude for the impactful community service work of SunTrust Bank in Volusia and Flagler counties. SunTrust Bank has support the mission of the United Way of Volusia-Flagler Counties by providing volunteers, donors, and advocates to tackle some of the community's most pressing issues in Education, Financial Stability, and Health.

Each year, SunTrust Bank employees and corporation commit over \$30,000 to nonprofits in our two-county area. Employees are generous in their gifts to United Way and other organizations and are committed to making a difference locally. Without their enthusiasm and support for this community, we would not be able to have the impact on families that need it the most.

Additionally, the United Way of Volusia-Flagler Counties is thankful to SunTrust Bank for allowing one of their team members to serve as a full-time Board member. SunTrust also allows staff members to serve as volunteers during our Teach Children to Save program each year. SunTrust has been a great partner to the United Way of Volusia-Flagler Counties and continues to show a commitment to serve this community by their company's focus on volunteerism.

We appreciate the legacy of service driven by the SunTrust brand and are looking forward to the opportunity to see SunTrust and BB&T united in a merger of equals. Their combined cultures of philanthropy and service would be a huge benefit to our local community and would have impacts for years to come.

Sincerely,



Courtney Edgcomb
Vice President, United Way of Volusia-Flagler Counties
cedgcomb@uwvfc.org
(386) 275-1944

Eike, Kathy

From: Quint Studer <quint@quintstuder.com>
Sent: Wednesday, April 03, 2019 5:36 PM
To: RICH BankSup Applications Comments
Subject: [External] Support for Sun Trust and BB&T merger

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PLEASE NOTE: This email is not from a Federal Reserve address.
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I am very excited about the proposed merger of Sun Trust and BB&T. Being involved in working with communities to improve the quality of life for citizens based on the success of Pensacola, it is important for every community to have the most effective and efficient financial institutions as possible. Today due to many forces at times banks are not able to participate as they would like in many small and mid-market cities from loans to community involvement. Being more aware of Sun Trust, find them doing much to help local people and businesses. Sun Trust merger with BB&T, I believe, will allow for even more support to local communities. My full support of this merger.

Sign up for my "[Cues From Q](#)" Newsletter each week!

Quint Studer

Founder, Studer Community Institute | studer.org

c: 850.232.4648 | quint@quintstuder.com

Please include on communication: DC Reeves | dcreeves@quintstuder.com | 850.232.9249

17 West Government Street | Suite A | Pensacola, FL 32502



April 1, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

254 S. Lauderdale St.
Memphis, TN 38126

t 901.522.8502
f 901.522.8505

www.jiffyouth.org

To whom it may concern:

It is my pleasure to write a letter of support for SunTrust and the great community work they support here in Memphis, TN.

Juvenile Intervention and Faith-based Follow-up (JIFF) has enjoyed a business relationship with SunTrust for over twelve years. We consider SunTrust a community partner, not just a banking partner, as they invest in organizations such as ours, a 501 3c non-profit, to improve the community for all citizens. The company is committed to the community in hours of volunteer service, from board level participation to teaching financial literacy to high school students.

In conclusion JIFF fully supports SunTrust and their potential merger with BB&T, as we believe the combined resources will only further strengthen their community support. JIFF's business is redirecting the lives of youth who have been raised in poverty and lack direction and support. SunTrust has been a partner we can count on, one that connects community resources, in leadership or service, they are there, fully engaged, always.

Sincerely,

Richard Graham
Executive Director

Eike, Kathy

From: Angela Bledsoe <abledsoe@mifa.org>
Sent: Wednesday, April 03, 2019 4:46 PM
To: RICH BankSup Applications Comments
Subject: [External] Letter of support for Suntrust BB&T merger from MIFA
Attachments: Federal Reserve letter of Support from MIFA.pdf

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To Whom It May Concern,

Please find attached a letter of support for the SunTrust and BB&T merger.

Thank you,

Angela Bledsoe
Corporate and Foundation Relations Officer
MIFA (Metropolitan Inter-Faith Association)

(901) 529-4571 Office
(901) 527-3202 Fax
abledsoe@mifa.org

910 Vance Avenue / Memphis, TN 38126
mifa.org



Our vision: Uniting the community through service.

Our mission: Supporting the independence of vulnerable seniors and families in crisis through high-impact programs.

This e-mail may contain privileged and confidential information and is intended only for the use of the specific individual(s) to whom it is addressed. If you are not an intended recipient of this e-mail, you are hereby notified that any unauthorized use, dissemination or copying of this e-mail or the information contained in it or attached to it is strictly prohibited. If you have received this e-mail in error, please delete it and immediately notify the person named above by reply e-mail. Thank you.



910 Vance Avenue | P.O. Box 3130 | Memphis, TN 38173-0130 | (901) 527-0208 | mifa.org

Our vision

Uniting the community through service.

Our mission

Supporting the independence of vulnerable seniors and families in crisis through high-impact programs.

April 2, 2019

**Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261**

To Whom It May Concern,

Please accept this letter as an indication of support for SunTrust Bank and the merger with BB&T from MIFA, Metropolitan Inter-Faith Association. MIFA is a private 501 c3 nonprofit agency located in Memphis, Tennessee. Our mission is supporting the independence of vulnerable seniors and families in crisis through high-impact programs.

We are thankful for the assistance that SunTrust continues to provide this agency through event sponsorships, direct financial donations, board-level volunteer leadership, and other volunteer initiatives. From program support to presenting sponsor of our annual Feed the Soul fundraiser and most recently as the presenting sponsor for our 50th anniversary Jubilee year, SunTrust has been a trusted partner.

The services that MIFA provides through these gifts of time and funds are vital to the clients we serve, and we remain grateful to SunTrust for their responsiveness to the needs of this agency and to the community.

Sincerely,

A handwritten signature in blue ink that reads "Sally Jones Heinz". The signature is written in a cursive, flowing style.

**Sally Jones Heinz
President & CEO**

Sally Jones Heinz, PRESIDENT & CEO | BOARD OF DIRECTORS: Executive Committee: Rev. Dorothy Wells, Chair; Paula Jacobson, Vice Chair; Ken Jones, Secretary & Legal Counsel; Aarti Bowman, Treasurer; Gregory M. Duckett; Brett Grinder, Milton Lovell; Margaret McLean

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MIFA's services are made possible through many private donations and funding from the Aging Commission of the Mid-South, the Corporation for National & Community Service, the City of Memphis, the Department of Housing and Urban Development, and Shelby County.

Eike, Kathy

From: Becky Brownlee <rbrownlee@georgiasbdc.org>
Sent: Wednesday, April 03, 2019 4:12 PM
To: RICH BankSup Applications Comments
Subject: [External] SunTrust/BB&T Merger

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On behalf of the University of Georgia Small Business Development Center, I would like to thank SunTrust for the community support we have received in the Savannah MSA market. For the past two years, the SunTrust Foundation has awarded the Savannah office two local grants to deliver financial education to small business owners. These grants allowed us to deliver over 480 hours of classroom instruction to 80 attendees.

The objective of the Small Business Success Academy is to provide the business owner with an understanding of how money flows through a business, which in turn will arm the business owner with the confidence they need to make better decisions for moving their business forward. This objective was achieved through the programs delivered in 2018 and 2019 and the attendees were able to attend at no cost thanks to the SunTrust support.

We look forward to continuing this relationship and offering no cost financial education to small business owners in our market in the coming years with the support of the new financial institution resulting from the merger of SunTrust and BB&T.

Becky Brownlee
Area Director

513 E Oglethorpe Av, Suite M
Savannah, GA 31401

p: [Savannah \(912\) 651-3200](tel:(912)651-3200)
e: rbrownlee@georgiasbdc.org
w: www.georgiasbdc.org
n: [Click here to subscribe to our newsletter!](#)



**Small Business
Development Center**
UNIVERSITY OF GEORGIA





www.bridgesdvc.org | post office box 1592 | franklin tennessee 37065 | 615.599.5777 | fax 615.599.1964

April 3, 2019

Federal Reserve Bank of Richmond
P. O. Box 27622
Richmond, VA 23261

FDIC Atlanta Regional Office
10 10th Street, NW, Suite 800
Atlanta, GA 30309-3849

To Whom It May Concern,

Because of continuous and generous support of our community organization by SunTrust Bank since 2010, victims of abuse in Williamson County, TN, find the safety, resources and support they need to move forward. Clients trust Bridges Domestic Violence Center to help them heal emotionally, make positive plans, and prepare for independence. SunTrust helps makes this possible, and we support SunTrust's application for merger with BB&T.

Bridges has been a happy customer of SunTrust for years as well. The clients, staff, volunteers and board of directors at Bridges are grateful that SunTrust Bank values our mission to ensure successful safe transitions to independent living through shelter, education, and case management. We support SunTrust's request to merge with BB&T and look forward to continuing partnership with the newly formed bank in the future.

With appreciation and support,


Linda Crockett
Executive Director


Lynn Schroeder
Development Director

* BRIDGES Domestic Violence Center is a non-profit organization under Internal Revenue Service Code 501(c)(3). Your donation may be tax deductible. For your benefit, and as required by law, we state that BRIDGES Domestic Violence Center did not provide any goods or services in consideration, in whole or in part, for this consideration.

Eike, Kathy

From: Leah Susi <LeahSusi@monroeharding.org>
Sent: Wednesday, April 03, 2019 3:10 PM
To: RICH BankSup Applications Comments
Subject: [External] Support for SunTrust

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Hello,

My name is Leah Susi and I am the Director of Development for Monroe Harding, which is a nonprofit that works with kids and teenagers that are in foster care. In 2018 we were the recipients of a grant from the SunTrust Foundation to support our Youth Connections Resource center which has a focus on providing financial literacy for youth that are currently in foster care or are aging out of foster care.

We appreciate the relationship with SunTrust as a community partner and are grateful for their partnership.

Best,
Leah Susi



Leah Susi
Director of Development
615-298-5573 ext. 103 (office)
615-812-4283 (mobile)
www.monroeharding.org



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Eike, Kathy

From: Keith Winsten <KWinsten@brevardzoo.org>
Sent: Wednesday, April 03, 2019 2:49 PM
To: RICH BankSup Applications Comments
Subject: [External] Community Support for the Sun Trust/BB&T Merget

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To Whom It May Concern

I wanted to positively comment on the proposed Sun Trust/BB&T Merger. We have had multiple Sun Trust employees on our board over the years, and have always found them to be highly ethical and dedicated to doing good work. Because of their engagement, Sun Trust has been a strong supporter of the Zoo's work in education and conservation and we believe this merger will only increase their ability to help us and the entire Central Florida community.

Sincerely,

Keith Winsten

Keith Winsten
Executive Director
Brevard Zoo
8225 North Wickham Road
Melbourne, FL 32940
Phone: 321 254 9453 ext 223
Fax: 321 259 5966

Wild adventures await you at the Zoo:

[Jack Hanna Live!](#)—Saturday, April 27—Join one of America's most beloved animal experts as he shares stories from his life of pure amazement!

[Sculpture Safari](#)—Marvel at 16 life-size metal animals made from recycled materials.

Eike, Kathy

From: aconroybaiter <aconroybaiter@jaspacoast.org>
Sent: Wednesday, April 03, 2019 1:33 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Subject: [External] letter in support of SunTrust and BB&T merger

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To Whom it May Concern:

I am writing in support of the SunTrust and BB&T merger, and am specifically writing to provide comments in support of the work that SunTrust does with Junior Achievement of the Space Coast (JASC).

To achieve success, Junior Achievement needs two things: financial investments and volunteers. In terms of financial support, SunTrust has been a partner with JASC for 30 years (back to 1999) and between SunTrust Bank, SunTrust Foundation, and SunTrust Wealth Management, has contributed almost \$50,000. Just this past fall, JASC received a workforce development grant for \$10,000 to continue our work preparing Brevard youth for the careers of the future. And in the works right now is a \$5,000 grant to support financial literacy for middle school students.

In terms of volunteers, our most significant volunteer of course is our board member, Vice President Ted Peters. Ted's work on our board of directors has been chiefly in the area of volunteer recruitment and acting as an advocate for funding opportunities. My staff knows that they can call on Ted with a volunteer opening, and we can count on him to assemble a group of SunTrust wealth managers and retail bankers to fill classroom requests.

We truly value all our relationships with SunTrust and especially with our closest allies--Ted Peters, Tammy Paycer, and Ann Luke. I was lucky enough to speak with with Florida Division President Scott Cathcart in 2017 who expressed his appreciation for the work JA does. I felt great about our continuing relationship then, and I continue to do so now moving toward the merger with BB&T.

Sincerely,

Anne Conroy-Baiter
President, JA of the Space Coast

--

Anne Conroy-Baiter
President, Junior Achievement of the Space Coast
1275 South Patrick Drive, Ste E, Satellite Beach, FL 32937
321.777.0982 | fax 321.777.0983 | cell 321-368-1996
www.jaspacoast.org

Eike, Kathy

From: Amy Meek <amy.meek@citrusunitedway.org>
Sent: Wednesday, April 03, 2019 11:46 AM
To: RICH BankSup Applications Comments
Subject: [External] SunTrust and the United Way of Citrus County

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To whom it may concern,
SunTrust has been a longtime champion to our United Way. Many local VP's and Executives have dedicated themselves to our organization and board service. Namely:

Marie Straight
Jim Kimbrough
Anthony Holte

Thank you

Amy Meek | CEO

United Way of Citrus County

1582 N Meadowcrest Blvd Crystal River, FL 34429

P: 352-795-5483

www.citrusunitedway.org



TAMPA HILLSBOROUGH
ECONOMIC DEVELOPMENT CORPORATION

March 28, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261



RE: SunTrust Community Impact – Tampa Bay

To Whom it May Concern:

I am pleased to write this letter and share with you a small portion of the tremendous impact that SunTrust has had on Tampa Bay community.

SunTrust has been a long-standing supporter of economic development initiatives in Tampa Bay, and its market presidents have played active leadership roles in our organization the Tampa Hillsborough Economic Development Corporation (EDC), since its inception. A previous market president, Allen Brinkman, served as Chairman for the EDC in 2014.

SunTrust leadership has participated in many of the domestic and international business missions we've conducted in the past seven years to help spur investment and business attraction in Tampa and Hillsborough County. Their insights and expertise have helped share our strategic plans in the past, and they are currently assisting us with one we have underway for our next three years.

The passion and commitment of SunTrust leaders in the Tampa Bay market has helped our region overcome obstacles to greater prosperity for our citizens. They've led advocacy initiatives in support of transportation projects and education and skills development. As early as 2003, then-SunTrust market president Dan Mahurin recognized that the future of our region would depend on our ability to attract and retain young talent. He and his peers at SunTrust helped underwrite research that led to the creation of a highly successful young professional leadership program called Emerge Tampa that was quickly adopted statewide.

These are but a few examples of the impact that SunTrust has had in helping the Tampa Hillsborough Economic Development Corporation and our regional economic development partners to move our local economy forward. We look forward to many more years of their involvement – as a new entity after the merger with - in shaping Tampa Bay's future.

Sincerely,

Craig J. Richard, CEcD, FM

Eike, Kathy

From: Jim Dickson <jimdicksonymca@me.com>
Sent: Wednesday, April 03, 2019 10:52 AM
To: RICH BankSup Applications Comments
Subject: [External] Suntrust Bank merger with BB&T

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PLEASE NOTE: This email is not from a Federal Reserve address.
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I am writing to support Suntrust Bank in their continued support of our community. I have been a customer at Suntrust for 24 years and also worked with them in YMCA business for that time.

Suntrust has been a vital part of the community support of non-profit organizations in Knoxville and our surrounding region. Their support has been through financial, human and strategic resources. Without them the YMCA would not be able to help 1,000's of our neighbors in need each year.

Please give me a call if you need more information.

Sincerely,
Jim Dickson
President and CEO
YMCA of East Tennessee
cell, 865-368-9623

Eike, Kathy

From: Karen Miller <kmillier@tallahasseeenders.org>
Sent: Wednesday, April 03, 2019 10:38 AM
To: RICH BankSup Applications Comments
Subject: [External] SUNTRUST and BBT MERGER

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TO WHOM IT MAY CONCERN:

The SunTrust Bank has been a reliable partner to the Tallahassee Lenders' Consortium (TLC) for a number of years. Tallahassee Lenders' Consortium, Inc., (TLC) has been the leader in providing comprehensive home buyer education, pre-purchase counseling, and down payment and closing cost assistance to low- to moderate-income families of the City of Tallahassee, Leon County and surrounding areas of Wakulla, Gadsden, and Jefferson counties. Early on, SunTrust committed to affordable Housing efforts in the Big Bend area (Tallahassee, Florida community) by becoming a member lender that offered services of low interest loans to moderate to low income citizens in our community. As a partner SunTrust supported TLC's counseling, training and education for our underserved clients and were ready to work them upon the completion of our program.

This Bank was one to put their funds where their mouth was. Each year SunTrust makes this commitment to secure the education of our operation of the Home Buyer Education classes. Several years ago SunTrust provided TLC with a large grant so that we could continue our credit counseling, education and marketing in the rural communities surrounding Tallahassee. It is great to have a partner that believes in our citizens, neighborhoods, and the community as a whole. TLC appreciates this affordable housing partner that makes dreams of homeownership come true.

Thank you,
Karen B. Miller

Karen B. Miller
Assistant Executive Director
224 Office Plaza
Tallahassee, FL 32301
Telephone: (850) 222-6609 x101
Fax: (850) 222-6687
www.tallahasseeenders.org

Eike, Kathy

From: B Smith <smithsaigon@gmail.com>
Sent: Wednesday, April 03, 2019 1:23 PM
To: RICH BankSup Applications Comments
Cc: B Smith
Subject: [External] Re: Comments on the SunTrust and BBT bank merger

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April 3, 2019

To: The Federal Reserve Hearing on the SunTrust Bank and BBT Merger
From: Barbara Smith
Re: Comments on the merger

Dear Committee,

We are retirees living in Florida who have been customers of SunTrust for 27 years.

Our 2 concerns are:

1. We cannot obtain any answers from SunTrust about what will happen to the interest rates on our accounts and time deposit CD's. We have called and also visited our branch but have not received any answers. Will the interest rates be grandfathered in the new bank or what?

When we decided to move some funds to another institution, the bank balked at us! Why balk at us!!!

Then we were told we couldn't make the transfer for 3 days and our only other option was that they would cut a check for us that we would have to walk over to our other institution!

But again, we have no answers to our first questions and our funds are at stake!

2. Both banks have numerous branches in our retirement community of 150,000 in The Villages, Florida, that are accessible by walking or by golf cart.

We are concerned that the new bank might not consider the needs of our retiree community when deciding which branches to keep open.

Hopefully the needs of the customers will be considered!

Respectfully,
Barbara Smith
smithsaigon@gmail.com



April 4, 2019

Board of Directors

Philip McCutchan
Chair

Hunter Nelson
Vice- Chair

Amy Broadwater
Sec/Tres.

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

Re: SunTrust Bank and BB&T Merger

Members

Melvin Black

Ron Crutcher

Jessica LaVeen Farr

Michael Frazee

Latrisha Jemison

Doug Lesky

Donald Majors

Keith Miles

David Morales

Tyane Powell

Meg Underwood

Miguel Vega

Richard Warren

The Housing Fund, Inc. (THF) is a private, 501(c)(3) organization established to finance affordable housing and neighborhood revitalization projects throughout Tennessee. Since its incorporation in 1996, THF has assisted over 3,300 first time homebuyers receive over \$24 million in downpayment assistance loans, as well as providing more than \$44 million in financing to assist individuals and organizations purchase, rehabilitate, or construct homes for low and moderate income families. To put these numbers in perspective, THF has lent over \$66 million, which has leveraged over \$440 million in private financing for more than 2,500 units.

THF's story began in 1993 with a community wide planning effort, Nashville's Agenda. Nashville's Agenda was a citizen led effort bringing together all of the City's disparate communities to dream about and develop "21 goals for the 21st Century." In 1995, out of these visioning sessions, a Housing Action Team organized around three objectives:

1. Establish a clearing house to coordinate affordable homeownership opportunities;
2. Increase the supply of affordable and subsidized housing; and
3. Invest more resources in current housing solutions; create more incentives to develop property.

President/CEO

Marshall Crawford, Jr.

The Housing Fund
305 11th Ave South - Nashville, TN 37203
Phone: 615.780.7000 - Fax: 615.780-7001
www.thehousingfund.org

In March 1996, the Nashville Housing Fund (NHF) was chartered as a "component unit" of the local public housing agency, a separate Nashville Housing Fund Board was appointed, and NHF received IRS 501(c)3 status in May. Four local banks (including SunTrust Bank) pledged \$250,000 each to capitalize a new affordable housing loan fund. Eight additional banks soon followed with similar investments. In September 1996, NHF made its very first downpayment assistance loan to a qualified low to moderate income family.

In 1999, NHF legally separated from the public housing agency becoming a separate legal entity, the "big 4" banks increased their investments to \$1 million each, and NHF applied to the U.S. Department of Treasury for status as a Community Development Financial Institution (CDFI). Concurrently, NHF applied for and in 2000 received \$2 million in CDFI funds, which were matched by locally raised funds from the Metropolitan Government of Nashville-Davidson County and other local sources. With these funds, in 2001, NHF started its Development Loan Program financing the construction of affordable homebuyer and rental housing developments and expanded its existing Downpayment Assistance Loan Program.

In 2002, NHF outgrew its original offices and applied to the State of Tennessee for Low Income Housing Tax Credits to develop the mixed use Laurel House Apartments with NHF offices on the first floor. The credits were awarded and NHF began construction of the development in the newly created Gulch Redevelopment District. In 2004, NHF moved to Laurel House, becoming the first new residential development in the District.

In 2005, the NHF Board voted to expand outside Davidson County and changed the organization's name to The Housing Fund (THF). THF now offers development loan services to the surrounding counties comprising the Metropolitan Statistical Area. In 2006, THF opened an office in Clarksville, Tennessee at that city's request, staffing it with a Loan Specialist and Program Coordinator. In 2007, THF hired a Director of Regional Services, opened an additional office in Bowling Green, Kentucky servicing a three county region, and entered into an agreement with the City of Franklin, Tennessee.

In 2010, following devastating flooding in Nashville-Davidson County that damaged over 11,000 properties, THF, working the Metropolitan Government and the Metropolitan Development and Housing Agency, led a flood recovery program for impacted homeowners that ultimately distributed over \$13 million in federal disaster recovery funds. During that same period, THF successfully authored a \$30 million application for Neighborhood Stabilization Program (NSP) funds from the U.S. Department of Housing and Urban Development and join a local consortium of non-profit agencies developing and redeveloping foreclosed and vacant properties.

In 2013, the flood recovery and NSP programs ended. In their wake, THF expanded its product offerings and mission from assisting low to moderate income homebuyers and affordable housing developers to include meeting broader community development financing needs, receiving a \$1.3 million CDFI fund award to assist homeowners with energy-saving retrofit and

repair projects and to develop real estate based loan programs for community facilities and neighborhood businesses. In early 2014, THF received statewide FHA certification and began offering its homebuyer assistance programs throughout Tennessee.

Today, with a dedicated and experienced staff and an effective and engaged Board of Directors, THF continues to be a regional leader in affordable housing and community development initiatives and policy development. With celebrating its 23rd year, The Housing Fund is a certified and growing Community Development Financial Institution with an exceptional industry rating and over \$24 million in total assets. As it has through its history, THF continues to find innovative ways to meet the financial needs of the communities it services.

Furthermore, our history would not be possible if not for the generous support of SunTrust Bank throughout the years. David Thibodeau, a former Executive Vice-President at SunTrust, played an instrumental role in the creation of The Housing Fund and served as the first chairman of the board of directors. His willingness to advocate for the formation of a new housing agency that would serve as a loan fund was significant, as other institutions also provided financial support. He was encouraged by the commitment to serve low- and moderate-income individuals and communities through the new agency. Other bank employees followed his lead and provided supportive services by teaching homebuyer education and creating mortgage loan products conducive to serving low- and moderate-income families.

To date, SunTrust Bank is THF's largest banking partner with over \$3 million committed to supporting our lending capacity. We would not be able to adequately serve the needs of the community without the support of SunTrust Bank and their employees, who are always willing to assist when needed. For example, in 2017, Jane Melrose, our relationship manager, was able to secure additional support for The Housing Fund during an effort to provide bridge financing to a local nonprofit who serve men getting out of prison. The need was temporary and our capacity was limited. Jane was able to convince senior leadership to increase their support to THF and a loan was successfully administered to the agency.

On behalf of The Housing Fund, I acknowledge our support for the merger between SunTrust Bank and the BB&T. We believe a merger of equals will significantly benefit the work community development organizations and strengthen a commitment to serving communities. We value our partnership with SunTrust Bank and the role it has played in our successful history. We look forward to continuing our banking relationship regardless of the new name and new structure established by the merger.

Sincerely,



Marshall E. Crawford, Jr., MPA
President & CEO

Eike, Kathy

From: Joanne Hickox <joanne@seniorsonamission.org>
Sent: Thursday, April 04, 2019 1:56 PM
To: BankMergerApplication@fdic.gov
Cc: RICH BankSup Applications Comments
Subject: [External] SunTrust BBT Merger

Internal Board-routing markings only

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To whom it may concern,

Seniors on a Mission exists to honor, love, and encourage independent senior adults, inspiring them to live invigorated lives filled with purpose and grace.

We accomplish our mission by creating day-long service opportunities that are age-appropriate, and team-oriented for people 60 - 108 years old. We are a small organization in Jacksonville Florida that was blessed back in 2014 to catch the eye of Lauren Butler, who was part of the Community Development Management team with SunTrust Bank. He came to one of our weekly service trips and unlike most bank executives, he stripped off his jacket, rolled up his sleeves and joined in the work for the entire day. He was a delight to talk with and entertained the senior adults as he work side by side with them. In one day, he brought more dignity, care and encouragement to 35 older people as a "visitor" than I had ever seen before. He sat across from them and looked directly into their faces and acknowledged them as people the community needed, while earning their trust and respect.

Trust and respect are two cherished qualities in people that reflect the culture of a company from the bottom up.

After his commitment to the seniors as people, he then solicited the financial support of his bank's foundation to benefit our nonprofit organization, Seniors on a Mission, Inc.

Each year for the past six years, Mr. Butler invested his time in our service trips and in an Action Council that we formed to help our small staff meet the needs of the growing organization. His leadership and genuine care for both our city and its aging population was recognized by our Board of Directors and he was asked to join our Board. Last year, Lauren Butler agreed to step into the Chairman of the Board position and helped lead us to the most successful friend-raiser event that we have ever had to share the story of Seniors on a Mission.

I believe a merger of two great banks with employees who are likeminded regarding their corporate responsibility of caring for those who are less fortunate in our communities, is something everyone should support. While I'm just one small nonprofit SunTrust has assisted, our seniors have given of their time to over 100 other nonprofit organizations in this city. Though the work we have accomplished for Junior Achievement Northeast Florida, we know how much SunTrust has done to educate the youth of our community as well as teaching young adults how to best navigate banking services.

I am obviously oblivious to the corporate reasoning for a merger, but I support the bringing together of two great companies who will continue to nurture the lives of the people where they operate their banking business. Their joint commitment to corporate responsibility can be nothing more than a win-win for the local community.

Joanne

Joanne Hickox
Seniors on a Mission, Inc.
2050 Art Museum Dr. Suite 102
Jacksonville FL 32207
904-551-4373 O
904-509-4784 C
joanne@seniorsonamission.org

April 4, 2019

Ms. Karen Leone de Nie
Vice President Community and Economic Development,
Federal Reserve Bank of Atlanta
1000 Peachtree Street N.E.
Atlanta, Georgia, 30309

Dear Ms. Leone de Nie,

This letter is in support of the SunTrust and BB&T banks merger plan. Virginia Cooperative Extension of Prince William has benefited from the benevolence and community service focus of SunTrust bank through grant funding for the past 6 years. Currently Virginia Cooperative Extension Prince William offers financial counseling and coaching, homeownership counseling and financial education seminars daily to the community which is supported in part by a grant from the SunTrust Foundation.

SunTrust Foundation grant funding is at work today strengthening lives for our community members through a partnership with United Way and the Virginia Career Center. Together these nonprofits offer financial counseling and coaching, reviewing credit with clients, tax preparation assistance and financial education topics prudent to our communities' personal financial health, through the Financial Empowerment Center of Prince William County.

We understand that both SunTrust and BB&T will continue to be deeply committed to and invested in our community and in programs that support financial empowerment through education and counseling. In that light, we send our support for this merger.

In Service to our Community,



Paige Thacker
Unit Coordinator,
Virginia Cooperative Extension-Prince William

Invent the Future

VIRGINIA POLYTECHNIC INSTITUTE AND STATE UNIVERSITY

Extension is a joint program of Virginia Tech, Virginia State University, the U.S. Department of Agriculture, and state and local governments.

Virginia Cooperative Extension programs and employment are open to all, regardless of race, color, national origin, sex, religion, age, disability, political beliefs, sexual orientation, genetic information, marital, family, or veteran status, or any other basis protected by law. An equal opportunity/affirmative action employer.



www.ext.vt.edu

Eike, Kathy

From: Perrick Ramirez, Cynthia A. <caperric@volusia.k12.fl.us>
Sent: Thursday, April 04, 2019 2:00 PM
To: RICH BankSup Applications Comments
Cc: Robert E. Ludlow - SunTrust Bank (Robert.Ludlow@suntrust.com)
Subject: [External] merger between SunTrust and BB&T banks

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Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

Re: Merger application between SunTrust and BB&T banks

Dear Sirs:

I am writing today in support of the merger application between SunTrust and BB&T banks. SunTrust Bank has been a valuable partner to FUTURES, Inc. d/b/a FUTURES Foundation for Volusia County Schools for more than thirty years. SunTrust has invested their employees' time and talent as volunteers within our programs as well as directly in Volusia County Schools and many community not-for-profit agencies.

SunTrust's Robert E. Ludlow, Senior Vice President, Business Banking, has served on our FUTURES Foundation Board of Directors since 2013 and currently serves as Board Vice President. Mr. Ludlow is just one of the many examples of SunTrust's employees who devote countless hours to our community, all with SunTrust Bank's encouragement and support.

From a financial commitment to our community and school district, SunTrust provides an annual \$5,000 grant supporting our Teacher Mini-Grant Program which assists in funding creative, innovative classroom grants for Volusia County Public School teachers. In 2014, SunTrust provided a \$25,000 grant for financial literacy and entrepreneurial based projects within Volusia County Schools. This funding provided hands-on opportunities for hundreds of students across the district to learn about financial literacy and how to develop, market and operate a business.

With SunTrust's investment, together, we are helping to make Volusia County Schools the best public-school system in Florida. This can't happen with state funding alone which is why SunTrust's support is so important and we are confident shall continue once this merger is complete. Please feel free to contact me for more information about SunTrust's involvement with FUTURES Foundation for Volusia County Schools.

Sincerely,

Cynthia Ramirez

Executive Director

FUTURES Foundation for Volusia County Schools

3750 Olson DR

Daytona Beach, FL 32124

caperric@Volusia.K12.FL.US

Office: 386.255.6475, ext. 50730

Cell: 386.235.3680

www.FUTURESVolusia.org

Twitter: @FUTURES_Inc and @TSICVolusia

www.facebook.com/FUTUREStoundation/

www.facebook.com/TSICFUTURES/



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SOULSVILLE FOUNDATION

Ensuring the future of the Stax Museum of American Soul Music,
Stax Music Academy, and The Soulsville Charter School

April 4, 2019

Federal Reserve Bank of Richmond
PO Box 27622
Richmond, VA 23261

Federal Reserve Bank:

I am writing today to voice my support and give my endorsement of SunTrust Bank, specifically the work of the Memphis based group. A key part of our organization's success over the past 20 years since our founding has been the work and support of SunTrust.

SunTrust has been the single presenting sponsor of our largest fundraiser for the past fifteen years. The bank's support has gone beyond the financial sponsorship and the team members in the Memphis office have been our biggest advocate for the event and our organization in general. In the time that SunTrust has been involved we have raised almost \$2MM to support the young people we serve in the most vulnerable areas of Memphis.

SunTrust has also provided valuable financing as we have grown our campus. Because The Soulsville Charter School is a nonprofit school in a very underserved area of the country, SunTrust's efforts in helping us obtaining low-cost financing allows us to keep placing even more emphasis on the quality of education the instructors and staff provide every day. It has helped us dedicate more time to concentrate on ensuring that every student we serve is prepared for a post-secondary education pathway to become successful adults and allowed us to focus more on our alumni support program to make sure students not only get into college but also stay in college.

The care that the entire SunTrust team provides has been critical in our success as an organization. I wholeheartedly endorse SunTrust's work in the community. If I can expound further on any of these comments, please let me know.

Sincerely,

Ross S. Hurst

Chief Financial Officer

cc: FDIC Atlanta Regional Office
Gigi Ferguson
Dorothy Cleaves



CNHED

Coalition for Nonprofit Housing and Economic Development

Dear Ms. Garr,

I am writing to acknowledge the contributions of Suntrust Bank to the Community Development field in the District of Columbia during and preceding my five (5) year tenure at the Coalition for Nonprofit Housing and Economic Development (CNHED). Beyond financial contributions, I want to acknowledge the leadership and thought partnering that you have personally provided to the Coalition and many of my 80 nonprofit members.

We deeply appreciate the funding you have provided over the years to help us advance affordable housing, small business development and more recently workforce development for returning citizens. We treasure the relationship we've enjoyed with the bank and you personally. Although the financial contributions have always been large, they have always been catalytic and having the "Good Housekeeping Seal of Approval" that SunTrust partnership provides has been extremely helpful.

We are in support of the merger in concert with our efforts with the National Community Reinvestment Coalition's (NCRC) design of the Community Benefits Agreement being brokered. We believe the leadership of both banks support NCRC's efforts to ensure appropriate investments and philanthropy in the DC market.

As things transition with the bank, we want all to know the good relations we had, the hope we have for a brighter future and our depth of appreciation of past efforts as well as future possibilities.

Sincerely,

Stephen Glaude

JUBILEE JOBS OF LEXINGTON

Work for Sustenance, Dignity and Hope

April 4, 2019

FDIC's Atlanta Office
10 10th Street, NW, Suite 800
Atlanta, GA 30309-3849

Re: BB&T-SunTrust merger application

To whom it may concern:

Executive Director

Cary Plummer

Board of Directors

Bill Rouse, Chair Emeritus
Erin Rouse, Chair
George Wallace, Vice Chair
Daniel King, Treasurer
Lorie Lovejoy-Ward, Secretary
Peter Barr
Brendan Burnett
David Caldwell
Amy Duzyk
Wiley Faw
Rick Griffith
Steve Heller
Kiki Jameson
John Kelly
Mary Raglin
Stephanie Raglin
John Walters

We are pleased to support the BB&T-SunTrust merger application and look forward to enhanced community resources that the merger should create.

Jubilee Jobs of Lexington is a nonprofit organization that specializes in job search preparation, job placement and career advancement for Lexington area residents who struggle with finding employment and a community of support. Our successful two-week, seven-step program is free to our clients and the employers with whom we work.

We have worked with BB&T's Community Development Department for the last several years. They have contributed much-needed financial resources and volunteer support to us so that we can continue to help those in our community who are less fortunate.

Specifically, BB&T has been a major on-going sponsor of our annual Suit Up and Get Hired Career Clinic which we conduct all day on Saturday, offering attendees the opportunity to become more educated about the job search process. Attendees are also offered the opportunity to meet with actual employers who need employees. This weekend event is in addition to our regular weekly programming.

We are sincerely appreciative of the support BB&T provides to Jubilee Jobs and we look forward to the enhancement this merger will bring.

Sincerely,



Cary Plummer
Executive Director

April 4, 2019

Re: SunTrust Banks/BB&T merger

To whom it may concern:

I wanted to take a moment to provide my endorsement for the SunTrust Banks/BB&T merger that was announced in February 2019.

Since 2002, SunTrust has been a strong partner and invested over \$700,000 into our local community through corporate support and the support of employees. This has a profound impact on our 15 county area. Our United Way impacts a life in our community every three minutes and without the ongoing support from SunTrust, this would not be possible. In 2018, we touched over 218,000 people in our region and much of this due to the ongoing support from our friends at SunTrust. They are strong community leaders to many organizations in our community.

We are so fortunate for SunTrust Bank's continued leadership in our community and are hopeful that the merger will allow this commitment to continue in our region.

If you require any further information or have any questions I can answer, please do not hesitate to contact me.

Sincerely,



Brittany Burnett
President/CEO
United Way of the CSRA
1765 Broad St.
Augusta, GA 30904
706-922-8923
bburnett@uwcsra.org

Eike, Kathy

From: Karen Klick <KKlick@piedmonthousing.org>
Sent: Thursday, April 04, 2019 3:10 PM
To: RICH BankSup Applications Comments
Cc: BankMergerApplication@fdic.gov
Subject: [External] SunTrust comments

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Dear Federal Reserve Bank of Richmond,

I am writing to provide comments in support of the work SunTrust is doing in our community. For many years, SunTrust has supported Piedmont Housing Alliance and our work to provide affordable housing solutions in the Charlottesville area, including housing counseling, financial coaching, and services for low-income residents. SunTrust has provided not only grant funding support but also financial education resource support, and pairs this with building connected relationships. We have worked particularly closely with Scott Horchler at SunTrust, and appreciate the commitment he and SunTrust have demonstrated. I appreciate the opportunity to provide these comments.

Best,
Karen

Karen Klick
Deputy Director

Piedmont Housing Alliance
682 Berkmar Circle
Charlottesville, VA 22901
Office: 434-817-0662 | Email: kklick@piedmonthousing.org
<https://piedmonthousingalliance.org/>

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Tampa Bay Partnership
4300 W. Cypress Street, Suite 875
Tampa, FL 33609

April 4, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 27622

To Whom It May Concern:

I am pleased to provide comments regarding SunTrust's involvement in the Tampa Bay community, and with the Tampa Bay Partnership.

The Tampa Bay Partnership is a regional organization of the most respected CEOs in Tampa Bay. Our mission is, "to create a unified, competitive and prosperous region." For many years, SunTrust has contributed at least \$50,000 per year to support our efforts. Two of SunTrust's previous market presidents served as chairman of the Partnership. Its current Tampa Bay Market President, Tim Schar, serves on our Council of Governors and he is Chair of an important task force we established to create an annual regional survey of residents. The Partnership has two active working groups, covering transportation and talent, and SunTrust is actively involved in each group.

I have also witnessed Mr. Schar's leadership with other important organizations, such as the non-profit technology event/organization, Synapse. To me, this active community and organizational engagement - with both funding and human capital - says a lot about SunTrust's commitment to improve the quality of life in Tampa Bay.

On a larger scale, I know that SunTrust employees in 2018 performed over 8,000 volunteer hours in the region, and during the same period, the SunTrust Foundation has invested over \$1.2MM. These are significant contributions, and they are appreciated by public, private and non-profit leaders across Tampa Bay.

If you have any questions regarding this letter, please feel free to contact me at (813) 872-2804 or rhomans@tampabay.org.

Sincerely,



Rick Homans, President & CEO

Eike, Kathy

From: Larry Laws, Sr. <Laws@FirstHomeAlliance.org>
Sent: Thursday, April 04, 2019 3:45 PM
To: RICH BankSup Applications Comments
Subject: [External] Comments about SunTrust & BB&T Merger

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Reference: SunTrust and BB&T Merger

First Home Alliance and SunTrust has partnered over the past seven years providing financial literacy and first-time home education in Northern Virginia and Washington DC, National Capital Area. Muriel Garr, Vice President and Regional Community Development Manager at SunTrust Bank has partnered with Larry Laws, Executive at First Home Alliance on various projects. Sun Trust has been instrumental in supporting First Home Alliance with community outreach and delivering critical financial education to the low-to-moderate income community. In 2014, SunTrust, VP, Muriel Guar worked hand-in hand with First Home Alliance to collaborate and organization local and regional financial institutions, nonprofits, faith-based and community organizations to conduct Prince William County's first ever Financial Empowerment Symposium. This even was amazing and well attended. There were great reviews form attendees who were empowered with the financial knowledge they received. With the magnificent support of SunTrust, First Home Alliance served over 916 households in FY2018. We could not have made the impact we did in, without supporting partners like SunTrust and their community development team.

For questions concerning this matter, please do not hesitate to contact me at 703-732-2222 or Laws@FirstHomeAlliance.org

Best Regards,

Larry J. Laws

Larry J. Laws, Sr., MBA, U.S. Army Veteran
Executive Director
[First Home Alliance](http://www.FirstHomeAlliance.org)
3138 Golansky Blvd, Ste 202
Woodbridge, VA 22192
Ph (703)580-8838, ext 106
Fax (703)580-8842

www.FirstHomeAlliance.org [Facebook](#) [Twitter](#) [Instagram](#) [Linkedin](#) [YouTube](#)



April 4, 2019

FDIC
Atlanta Regional Office
10 10th Street, NW, Suite 800
Atlanta, GA 30309-3849.

Dear Sir/Madam:

Communities In Schools of Hampton Roads (CISofHR) is writing this letter in support of the work SunTrust is doing in our community. CISofHR and the SunTrust Foundation have been working collaboratively in the Hampton Roads community since 2017. Our mission is to surround students with a community of support, empowering them to stay in school and achieve in life.

At Communities In Schools, we see potential in every student, and we're committed to helping them see it too. We are in K-12 schools every day, weaving a network of support around at-risk students and working hand-in-hand with their schools, families and communities to create access to the resources and opportunities that help them overcome life's barriers and reach their full potential.

At CISofHR we know that there is no one-size-fits-all approach to changing students' lives. That's why our evidenced based model integrates a variety of supports to help students develop the social, emotional, and academic competencies that help them overcome barriers to success. At every CIS school, our site coordinators: provide a variety of support, across 3 different tiers, to help as many students as we can. With support from the SunTrust Foundation, CISofHR has been able to provide and maintain full-time site coordination at Granby High School.

Mark Johnson, Vice President & Community Development Manager, SunTrust Bank, and Charity Volman, President/South Hampton Roads, SunTrust Bank have been exceptionally supportive, influential, and engaged in the involvement of what we are doing in the community to enhance the lives of our students. Additionally, they've provided a number of volunteers to provide financial literacy programs at some of our schools, they've allowed our board members to use their office space, and they've connected me with a number of community partners.

We are confident that the merge between SunTrust Bank and BB&T will impact and reinforce our relationship. While allowing both of our organizations to reach additional students that need our services throughout Hampton Roads. Thank you for letting us share the impact that you have had on our kids and we value the role Mr. Johnson and Ms. Volman play in our community.

Sincerely,

A handwritten signature in cursive script that reads "Elaine R. Sinclair".

PO BOX 7784 Portsmouth, VA 23707
sinclairh@cisofva.org
757-580-7966
www.cisofhamptonroads.org

Eike, Kathy

From: Marcia McHugh Turner <marcia@unitedwaylee.org>
Sent: Thursday, April 04, 2019 5:45 PM
To: RICH BankSup Applications Comments
Cc: Cliff Smith; michael.j.johnson@suntrust.com; jason.brewer@bbandt.com; tgranger@uwof.org
Subject: [External] Letter of Support from United Way of Lee, Hendry, Glades, and Okeechobee Counties for SunTrust and BB&T Merger

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Over the years it has been my pleasure to work with the wonderful people at both SunTrust Bank and BB&T Bank. It is my pleasure to write this letter in support of the Banks. Both banks have been great partners of the United Way. Whether it be participating in the United Way allocations process, volunteering and hosting the Volunteer Income Tax program, or providing additional financial support to help hurricane victims. The Banks have repeatedly demonstrated an exemplary commitment to giving back to our community. They both have exhibited the highest ethical standards and their philanthropic efforts and their passion for helping others make them a role model for all companies in our community.

Sincerely,

Clifford W. Smith
President

Cc: Michael Johnson, SunTrust Bank
Jason Brewer, BB&T Bank
Ted Granger, United Way of Florida

Cliff Smith
President

United Way of Lee, Hendry, Glades, and Okeechobee
7273 Concourse Drive | Fort Myers FL 33908
t 239.433.2000 ext. 222 | d 239.433.7202
e cliffs@unitedwaylee.org | w UnitedWayLee.org
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Eike, Kathy

From: Lovell, Janice E <JELovell@trevecca.edu>
Sent: Thursday, April 04, 2019 5:44 PM
To: RICH BankSup Applications Comments; 'BankMergerApplication@fdic.gov'
Subject: [External] Comments regarding SunTrust support in the community

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To Whom It May Concern,

Thank you for the opportunity to comment on the work of Sun Trust Foundation in the community.

The Sun Trust Foundation has provided funding for students at Trevecca Nazarene University in Nashville, Tennessee through the Sun Trust "Stay-in School" and later the Sun Trust Retention Scholarship program.

Funding totaling more than \$30,000.00 has been awarded in the past seven years to students who have exhausted other sources of financial aid. The impact on the lives of students is monumental.

Stories of people like Kimberly K., a junior with high financial need because of the sudden death of her father in the first year of college. Her family contribution was limited – Sun Trust Retention kept her in school!

Athyn G., was able to graduate as the oldest of ten children and the "first college grad" in her family. She changed her life and her siblings by paving the way to getting it done – the extra retention dollars helped.

Alexandra P., worked hard to achieve a 3.2 GPA but still had a balance due near semester end. The funds from Sun Trust Foundation kept progress rolling and she graduated to serve in the field of Psychology.

These are but a few samples of the people in our community touched by the work of Sun Trust.

It is easy for me to say the work of Sun Trust Retention Scholarship should go on! I see so many pieces that change the whole picture in my community. We look forward to a continued relationship!

Sincerely Yours,

Janice E. Lovell

Director

Grants & Foundation Relations

Trevecca Nazarene University

333 Murfreesboro Road

Nashville, TN 37210

Office 615-248-1563

Mobil 615-479-5103





We build strength, stability, self-reliance and shelter.

April 3, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

and

FDIC's Atlanta Regional Office
10 10th Street, NW, Suite 800
Atlanta, GA 30309-3849

To who it may concern,

My name is Colleen Dudley, I currently serve as the Executive Director of Habitat for Humanity of Tennessee, having served in this role for the past eleven years. During that time, Habitat affiliates across our state, as well as me personally, have had the blessing of developing a relationship with the community-minded companies that are SunTrust and BB&T, along with many of their employees.

Habitat for Humanity, is a faith-based organization serving families internationally and domestically, helping to provide more than shelter, more than homes; providing families with hope and lifelong foundations of stability. Habitat is also an organization that thrives on the generosity of people and companies such as SunTrust and BB&T; with their talents, time, capital and hearts.

SunTrust and BB&T along with their wonderful people have helped in our mission in many ways, and for many years, with our mutual purpose of helping people prosper financially thru home ownership. SunTrust as well as the generous employees of BB&T have been involved with Habitat across our State. SunTrust and BB&T have participated on builds, given to our events, providing funding homeowner financial education and have employees currently serving on our affiliate's and our state board of directors.

With the historical community commitments of both partner companies, and with confidence that will continue after the merger I am in full support of this merger of equals! I look forward to a continuing relationship with the new company and being a partner of its growth in the State of Tennessee.

In partnership,

A handwritten signature in blue ink that reads "Colleen Dudley".

Colleen Dudley
Executive Director



Dear Chris:

I am writing to you to communicate my excitement of the pending BBT and SunTrust Merger and how it should positively impact the Small Business Community in Charlotte and the Region. SunTrust is a leader in CRA investing throughout the region. SunTrust invested in the First Capitala SBIC Fund in 1999 and SunTrust has invested in all of our 4 SBIC funds. SunTrust also serves on the Advisory Board of our SBIC Fund.

Since 1999, the Capitala SBIC Funds have invested in over 150 small businesses in the region and deployed over \$1.5 Billion of investment into these small business. The investment into these small business has created substantial job growth in the region.

SunTrust is our longest and one of our Largest SBIC investors and their commitment to Community Reinvestment and Small Business Investment Programs have had a substantial positive impact to our region. With the merger the amount of resources that can be dedicated to Community Reinvestment and Small Business investment substantially increases and I believe will substantially benefit the small business community of Charlotte and the Region.

I am happy to speak on the positive impacts of this merger to anyone interested, including; regulators, shareholders, and Customers of the bank. My Father served on the Board of Directors for BBT banks for most of the 1980s to the mid 1990s. My guess is he would be very impressed with the growth of the bank and how the bank has helped provide capital to the growth of small businesses.

Joe Alala, III
Chairman and CEO
Capitala Group, LLC

Eike, Kathy

From: Beth Doyle <Beth.Doyle@Centrahealth.com>
Sent: Friday, April 05, 2019 4:51 PM
To: RICH BankSup Applications Comments
Subject: [External] SunTrust and BB&T merger comments

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Dear Sir or Madam:

I'm writing to indicate support of the intended SunTrust/BB&T merger. SunTrust has been a critical partner with the Centra Foundation in addressing the health needs of our community. Since 1991, SunTrust has provided more than \$160,000 in support of the Foundation's charitable mission. For the past several years in particular, SunTrust has helped fund a vital program to provide free screening mammograms to low-income women in our community who would otherwise not be able to afford this potentially lifesaving early detection of cancer. We look forward to maintaining our long-standing relationship with this corporate leader in addressing our community's health needs.

Sincerely,
Beth Doyle
Executive Vice President

Centra Foundation
1920 Atherholt Road, Lynchburg, VA 24501-1104
P 434.200.4790 M 434.851.2956

centrafoundation.com | beth.doyle@centrahealth.com
centrahealth.com

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April 5, 2019

Dear Federal Reserve Bank of Richmond:

The Miami-Dade Beacon Council is pleased to provide this letter which highlights SunTrust's partnership with The Beacon Council and their support of Miami-Dade County.

As the economic development partnership for Miami-Dade County, our mission is to increase jobs and investment by promoting the community as a world-class business destination and assisting companies with their expansion and relocation in Miami-Dade County. As such, we work closely with the local business, education and workforce community to promote economic development and prosperity in Miami-Dade County.

SunTrust continues to be an active supporter of The Miami-Dade Beacon Council which is demonstrated by their participation on our Board of Directors and Industry Committees. SunTrust's investment and engagement has supported our efforts to market Miami-Dade as a world-class business location, to grow local companies and to shape Miami-Dade's economic future. Their thought leadership, collaboration, and passion are helping drive economic growth in our local community.

Through their support of The Council's One Community One Goal (OCOG) initiative, SunTrust's leadership and investments are assisting with bringing together a broad spectrum of Miami-Dade organizations, working to advance the goals of our inclusive and diverse community.

SunTrust has participated with OCOG's Career Connections program that brings local executives to high schools for career pathing sessions. These executives provide their insights for success and help the students prepare for the jobs of today and tomorrow.

SunTrust has also provided OCOG with a generous Lighting the Way Award for the Miami Community Ventures program. The award has helped kickstart this innovative initiative that is designed to connect "structurally unemployed" individuals to living wage jobs. The Miami Community Ventures program utilizes performance-based incentives, job retention wraparound services, and a network of community organizations to form sustainable partnerships that promote job creation in economically distressed communities.



SunTrust's engagement with The Miami-Dade Beacon Council has shown that they are a purpose-driven company dedicated to the financial well-being of Miami-Dade County's businesses and residents. SunTrust Bank continues to be instrumental in guiding The Council's investment and operational banking portfolio for over a decade.

We are enthusiastic by the economic opportunity the merger of SunTrust and BB&T will create as a premier financial institution, continuing to serve our local community.

Please feel free to contact me should you need additional information.

Sincerely,

Michael A. Finney
President & CEO

Eike, Kathy

From: Lawrence Trachtman <larry.trachtman@duke.edu>
Sent: Friday, April 05, 2019 4:29 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Cc: Bell.Chris
Subject: [External] public comments on community involvement

NONCONFIDENTIAL // EXTERNAL

PLEASE NOTE: This email is not from a Federal Reserve address.

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To whom it may concern:

I am writing in support of SunTrust and their longstanding involvement in the Durham, NC community. The organizations I represent, the Lincoln Community Health Center, and the Lincoln Community Health Center Foundation, have benefited from grants over several years from the SunTrust Foundation.

Lincoln Community Health Center has proudly provided primary and preventive health care to a low income, under and uninsured population in Durham County since 1971. Lincoln traces its history to the original Lincoln Hospital founded in 1901. As of 2018, our community health center served almost 40,000 unique individuals. 55% are uninsured, 89% are racial or ethnic minorities and 49% prefer to communicate in a language other than English. We offer a vast array of services including adult, family, and pediatric medicine, behavioral health, dental services, laboratory, radiology, and a full service pharmacy with greatly reduced cost prescription drugs made available to our patients. In addition, we operate satellite clinics that serve special populations such as persons who are homeless, who have HIV/AIDS, and a clinic in an urban high school. We also provide no-cost transportation to and from appointments.

Since 2015 the SunTrust Foundation has provided grants to Lincoln totaling \$37,000. These funds have supported diverse projects that include technology upgrades, diabetes programs, and dental services. Although Lincoln receives some federal funding, community support is essential when federal and other restricted funds cannot be used or may be reduced. We also fundraise from donors, the local community, and other corporate partners to support operating expenses, and new and innovative programming.

It is our desire that the merger of SunTrust and BB&T will continue to support nonprofit organizations, such as Lincoln Community Health Center, and the many other outstanding organizations that provide services in Durham County, to vulnerable populations. We have appreciated the relationship with SunTrust, and hope that we can forge a new relationship under the merger. I would invite a representative to tour our health center at your convenience.

Thank you for the opportunity to provide comments.
Respectfully,

Lawrence Trachtman
Development Director

Lincoln Community Health Center
1301 Fayetteville St., Durham NC 27707
larry.trachtman@duke.edu
919-956-3863



GREATER MEMPHIS CHAMBER

April 4, 2019

Mr. Tom Barkin
President and CEO
Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

RE: Support of the merger between SunTrust and BB&T

Dear Mr. Barkin,

On behalf of the Greater Memphis Chamber, please accept our enthusiastic support for the proposed merger of SunTrust and BB&T. The Greater Memphis Chamber is one of the oldest chambers in the country having been established in 1838, less than 20 years after the founding of the City of Memphis. We were created by the business community, and today because of the level of support we have received from companies like SunTrust, we are the largest economic development organization in the Mid-South representing thousands of businesses from small enterprises to the largest employers in the Memphis region.

In the past decade alone, SunTrust has contributed over a half a million dollars to community programs and initiatives of the Greater Memphis Chamber and the Memphis Chamber Foundation. Their support has allowed us bring Pre-K education to Memphis and Shelby County, build one of the largest urban parks in the country, Shelby Farms Park, and create the EPIcenter, a hub for entrepreneurship in the region. Their consistent support has also been instrumental in our ability to attract new businesses and industries to the area, as well as assist existing companies expand and grow.

SunTrust is an exceptional business and community leader in Memphis, and we expect this merger with BB&T to have an even greater impact on the people and business community in the Memphis region. The creation of the sixth-largest bank in the country, with both banks having strong commitments for economic growth and community development in Southern states, makes it a big win for all of us locally and for our nation.

In addition to this letter of support, Eric Miller, SVP of Economic Development, has registered to testify at the public hearing in Atlanta on May 3, 2017.

Sincerely,



Beverly C. Robertson
President & CEO



**Junior
Achievement®**
of Memphis and the Mid-South, Inc.

307 Madison Avenue
Memphis, Tennessee 38103
Phone: 901-366-7800
Fax: 901-366-7971
www.jamemphis.org

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

April 5, 2019

Regarding: Support of SunTrust's Work in the Community

We are honored to comment in support of the visible, generous and important work SunTrust does in the Memphis community. For more than 20 years SunTrust has been a major supporter of Junior Achievement of Memphis and the Mid-South with volunteers, executive leadership, contributions and fundraising.

SunTrust volunteers are active in both Junior Achievement's classroom programs and our capstone JA BizTown experience. A team from SunTrust was in our building just last week volunteering by leading a class of 5th graders through BizTown, a simulated city where students learn business skills and put into action lessons they've learned in classes the previous five weeks.

SunTrust has generously provided executive leadership to Junior Achievement with active, long-time membership on our board of directors.

SunTrust has been a generous financial supporter of Junior Achievement and the work we do to improve financial literacy, prepare young people for work and ignite entrepreneurship. In addition to corporate financial support, SunTrust employees are active fundraisers and volunteers for the Junior Achievement Bowl-A-Thon, which is our largest annual fundraising event. SunTrust employees are creative in fundraising for Junior Achievement, going so far as to put on a corporate fashion show to raise money to support the important work we do at JA.

SunTrust is a generous, committed partner for Junior Achievement and other organizations working to strengthen the fabric of the Memphis community, and we are proud to submit this letter of support.

If you have questions or need more information, please contact me at 901.366.7800 or KCherry@JAMemphis.org.

Sincerely,

Kim Cherry
Interim President and Chief Operating Officer

Eike, Kathy

From: Jeri Smith <Jeri.Smith@heart.org>
Sent: Friday, April 05, 2019 2:54 PM
To: RICH BankSup Applications Comments
Subject: [External] Community Engagement

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PLEASE NOTE: This email is not from a Federal Reserve address.
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American Heart Association-Richmond Virginia, is honored to work with such an amazing team from SunTrust in our area! We are the beneficiary of community dollars toward our Go Red For Women campaign, as well as tremendous employee engagement, serving on our Executive Leadership Teams. 2020 brings still a higher level of engagement as, Niki Scott, will serve as the 2019-2020 Go Red For Women Campaign Chair, and Vanessa Hampton will continue to serve in her third year as an ELT member.

The employee participation through education and awareness events held at multiple facilities is vital in helping to spread messaging of known risks of heart disease and stroke to the vast number of SunTrust employees in our area who then carry what they have learned to their families and community groups.

SunTrust is truly a valuable asset to the campaign and mission work in our community. We are thrilled to have such a strong relationship with SunTrust in our community and look forward to the potential growth of this collaboration with the impending merger.

Heart Full of Thanks,
Jeri



Jeri Smith Howell
Development Director, Go Red For Women
American Heart Association
4217 Park Place CT | Glen Allen | VA | 2306
O 804.965.6539 | M 540.871.4017

Eike, Kathy

From: Jennifer Bodensiek <jbodensiek@jmaryland.org>
Sent: Friday, April 05, 2019 1:21 PM
To: RICH BankSup Applications Comments
Subject: [External] Letter of Support SunTrust/BB&T Merger
Attachments: SunTrust.BB&T.Letter of Support.2019.pdf

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April 5, 2019

Mr. Thomas I. Barkin
President
Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond VA 23261

RE: Letter of Community Support- BB&T/SunTrust Merger

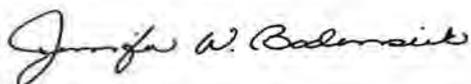
Dear Mr. Barkin:

On behalf of Junior Achievement of Central Maryland, I share my enthusiasm and support of the BB&T- SunTrust merger. This is a union of two highly committed community-oriented institutions. By joining together, community investments will only increase to build stronger neighborhoods and more opportunities right here in Maryland.

We are fortunate to work closely with both SunTrust and BB&T associates as trusted community volunteers where they work side-by-side with us to help contribute to the economic development of at-risk communities like Baltimore. This merger will only expand resources to invest in programs like Junior Achievement and other crucial economic development initiatives such as, expanded investment in small business and community development projects.

We wholeheartedly support the merger of BB&T-SunTrust for the betterment of the communities in Maryland we serve.

Sincerely,



Jennifer Bodensiek | President & CEO
Junior Achievement® of Central Maryland
10711 Red Run Blvd | Suite 110 | Owings Mills, MD 21117
O: 410.753.3287 | M: 443.921.5362 | jbodensiek@jmaryland.org

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114 MORGAN HALL
KNOXVILLE, TN 37996
(865) 974-5779
ADVANCEUTIA.COM

April 5, 2019

Federal Reserve Bank
P.O. Box 27622
Richmond, Virginia 23261

To whom it may concern:

I would like to take this opportunity to recognize the support received from Sun Trust to conduct youth financial literacy across the state of Tennessee. Young folks have a need to learn how to manage money at an early age and the University of Tennessee Extension Service is able to conduct its programs because of a partnership with Sun Trust. The partnership helps fund curriculum development and statewide deployment in Tennessee.

Students from nearly 300 schools and organizations in approximately 75 counties participate. The program reaches more than 250,000 youth, who become more financially responsible citizens, providing an estimated annual economic impact of \$5 to \$10 million.

We could not do this work on a statewide level without the support from Sun Trust. I ask you to consider this information as the merger with BB&T transpires. Thank you.

Sincerely,



Director of Advancement

Eike, Kathy

From: Jamie Cooper <jcooper@cischarleston.org>
Sent: Thursday, April 04, 2019 11:51 AM
Subject: [External] Comments in support of SunTrust

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To Whom It May Concern,

SunTrust has partnered with our organization for many years in effecting change in the lives of students throughout the Lowcountry of South Carolina. SunTrust's support allows organization to continue to serve over 8,000 students and case manage almost 800 students each years. Through Integrated Student Supports and Social Emotional Learning we are able to increase students attendance, increase positive behavior, and increase students academic performance. Last year, all seniors case managed by CIS within Charleston County graduated, this is even more impressive when considering that these students attend some of the worst performing high schools in SC.



Jamie J. Cooper | Executive Director
Communities In Schools of the Charleston Area
1090 East Montague Ave., Charleston, SC 29405
O: 843.740.6793 Cell: 843.847.1276
jcooper@cischarleston.org

To Learn More: www.cischarleston.org

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The University of Memphis
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Fax: 901.678.0177

www.memphis.edu

April 4, 2019

Federal Reserve Bank of Richmond
701 E. Byrd Street
Richmond, VA 23219

Federal Deposit Insurance Corporation
Atlanta Regional Office
10 10th Street, NW., Suite 800
Atlanta, GA 30309-3849

Dear Federal Regulators:

On behalf of the Benjamin L. Hooks Institute for Social Change at the University of Memphis, I am submitting this letter to commend SunTrust Bank (Memphis, Tennessee) for their outstanding engagement, leadership, and support of the Hooks African American Male Initiative (HAAMI). The HAAMI program is critical to retaining and graduating male African American students who are workforce ready and are prepared to make significant contributions to the social, cultural, and economic fabric of our city, state, and nation.

The Hooks Institute, an interdisciplinary center at the University of Memphis (UofM), was founded in 1996 with funding from the State of Tennessee and the United States Congress. The Institute's mission is teaching, studying and promoting civil rights and social change. Institute programs include funding faculty research and publications that inform broad sectors of the community, including educators, students, civic leaders and policymakers, business leaders, community organizations and individuals. Institute initiatives such as documentary films, conferences, symposia and lecture series fulfill the Institute's education goal. The Hooks Institute's community engagement programs have included financial literacy classes for adults, voter registration and education, the Splash Mid-South Initiative to increase minority children's ability to swim, student educational enrichment activities, and HAAMI, one of the Institute's signature programs.

HAAMI provides intensive coaching and mentoring of students by university faculty and staff and local business leaders. HAAMI provides students monthly education enrichment sessions focusing on topics such as study skills, tracking academic progress, personal financial literacy, soft skills, and personal development. HAAMI students develop career readiness skills through resume-writing, professional etiquette, and personal networking training and mentoring. Finally, intensive case management identifies students facing challenges that impede progress toward degree attainment and provides resources to overcome those challenges including financial difficulties, job and family responsibilities, and food, housing and transportation insecurities. The resources that HAAMI provides support students across a \

diverse range of academic and career interests including social sciences and the humanities, business, and STEM disciplines.

The goal of HAAMI is to positively impact the University's retention and graduation rates of African American males by improving success in academic achievement, personal development, and career readiness. This is important because African American academic achievement is essential to the success of Memphis and the University of Memphis, the largest post-secondary institution in the region. African American males represent 29.8 percent of Memphis' population. In 2018, the Memphis poverty rate was the second-highest in the nation at 17.1 percent among large metropolitan areas. Poverty is even higher among African Americans at 24.5 percent for the same area. A college education significantly decreases poverty status. Only 4.1 percent of Memphians with bachelor's degrees live in poverty, while 17.9 percent of Memphians with only a high school diploma live in poverty. 65 percent of HAAMI students are from Memphis, 60 percent of HAAMI students are first-generation college students, and 60 percent report household incomes of less than \$15,000 per year.

The HAAMI program has a positive impact for students. The average Fall 2018 GPA for African American male students at the University of Memphis was 2.34, while the average GPA for HAAMI students was 2.82. This average GPA represents a significant increase from the Fall 2017 average HAAMI GPA of 2.5. The percent of hours completed (hours completed/hours attempted) increased 4% overall, more than the last cohort. All students finished the Spring 2018 semester with an increase in cumulative credit hours. Further, 82 percent of HAAMI students ended Spring 2018 in good standing. This includes students who were on academic probation before they became involved in the HAAMI program. HAAMI is also showing positive impact on overall University graduation rates as the 5-year graduation rate for African American males at the University of Memphis has risen 16.8 percent in the last three years, surpassing a 11.5 percent rise for all UofM students during that time.

While students attending the UofM are from around the nation, most students are from Tennessee and the Mid-South. Among HAAMI members, 65% are from Memphis. With respect to majors, HAAMI students are enrolled in social sciences and the humanities (54%), and business/finance and STEM (46%). At the UofM, there were 2,258 African American male students in Fall 2018, and 1,957 African American male students in Spring 2019, a decrease of 13%. The fact that HAAMI continues to retain students, particularly those facing tremendous challenges, is particularly satisfying.

This success is not possible without generous support from the private sector as all direct costs for HAAMI are funded through donated and grant dollars. SunTrust Bank is a critical partner in this effort. Over the past two years, SunTrust has awarded the Hooks Institute \$25,000 (made with two gifts of \$20,000 and \$5,000 for fiscal year 2017 and fiscal year 2018, respectively). The Hooks Institute currently has pending a grant request to SunTrust for the HAAMI program for \$5,000.

SunTrust's grants have enabled the Hooks Institute to provide financial literacy courses and personal financial counseling to HAAMI students and the entire UofM community. In collaboration with SunTrust's Operation Hope program, the Hooks Institute has hosted sessions with HAAMI and other UofM students on personal financial management, credit and budgeting. The private counseling sessions have revealed credit issues that include identity theft, red flags in credit histories, and students

Federal Reserve Bank of Richmond
Federal Deposit Insurance Corporation
April 4, 2019
Page 3

whose financial diligence have created great credit scores - sometimes to their surprise! For those students needing further assistance, Operation Hope created financial plans and followed up with the students regarding their progress.

Finally, SunTrust's support of the HAAMI program exceeds financial support. Dorothy L. Cleaves, SunTrust's Community Development Manager for the Memphis and Nashville Region, served on the advisory board of the Benjamin L. Hooks Institute for several years. In this position, she provided strategic advice on fundraising, sustaining, and growing the HAAMI program. She also advised the Hooks Institute on developing additional community partnerships. Additionally, on February 27, 2018, I was invited by Ms. Cleaves to make a presentation and lead a discussion with SunTrust officials that included Johnny B. Moore, President and CEO of SunTrust (Memphis), on the impact of HAAMI and other Institute programs on alleviating disparities in Memphis.

SunTrust has played a critical role in sustaining and helping to sustain the success of the HAAMI program. For that SunTrust should be commended. The Hooks Institute, and the students that we serve, are grateful the beneficiaries of this support.

Sincerely,



Daphene R. McFerren
Executive Director

Eike, Kathy

From: Jonathan Gedeon <jgedeon@humankind.org>
Sent: Friday, April 05, 2019 10:37 AM
To: RICH BankSup Applications Comments
Subject: [External] SunTrust

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To Whom it May Concern,

I would like to voice my support for SunTrust and the work they do in the community. Members of SunTrust's staff are very active in supporting our programs through providing financial education, serving on our Ways to Work Loan Committee, and acting as a general resource around financial education for our staff and the low to moderate income individuals we serve. We hope to continue this beneficial relationship in building our communities.

Thank you,

Jonathan Gedeon
Site Manager, Ways to Work/Financial Opportunity Center

HumanKind

908 N. Thompson Street
Richmond, VA 23230
Direct: 804-461-3585 ext.1117
Cell: 804-229-0358
Fax: 804-303-8523
Email: jgedeon@humankind.org

Please note our new location effective 02-18-2019



Wesley
Community
Centers of
Savannah, Inc.



Our Program is proud to have earned NAEYC Accreditation; the mark of quality for early childhood education programs.

Vau R. Johnson, II, President

Nancy Merchen, VP

Monica Matvianni, Secretary

Jeanine Thompson, Treasurer

*Rev. David Thompson
Coastal District, D.S. UMC*

Board Members

William Briggs

Ben Herron

Patti Newman

Eula Parker

Beverly Sheppard

Robert P. Witzner, Jr.

*Tammy A. K. Mixon-Calderon
Executive Director*

April 4, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, Virginia 23261

Dear Merger Application Committee,

This letter is in support of the work Sun Trust Bank does with Wesley Community Centers of Savannah, Inc. in the Savannah, Georgia community. Wesley Community Centers is a private, non-profit organization that started in April of 1949. Our mission is to enhance the economic, educational, and spiritual growth, through excellence in early learning care and services for women, children and families.

Sun Trust Banks VP, Community Development Manager, Ms. Stephanie Johnson, has been partnering and supporting Wesley Community Centers for well over ten (10) years. Sun Trust initially supported Wesley's Holiday Adoption program by adopting families and providing Christmas gifts for them. Yearly, over \$3,500 in gifts/toys and gift cards are given to our families through this program.

For the past five (5) years, Ms. Johnson and other Sun Trust staff have taken on an integral piece of our Financial Literacy classes. Sun Trust partnered with Wesley and implemented "Will Power and Wisdom to accumulate Wealth (WWW) Savings Initiative. This program helps low- and moderate income individuals and families, establish a regular savings program with the goal of becoming homeowners or small business owners, providing post-secondary education to family members or otherwise improving their economic well-being. This program provides savings counseling, financial literacy training, and the opportunity for participants to open up a Sun Trust Bank Savings account, with a minimal amount of \$25.00, and no service charges for one (1) year.

1601 Drayton Street • Savannah, Georgia 31401-7525 • (912) 236-4226 • Fax (912) 236-6128
E-Mail: wesley.centers@hotmail.com

Empowering a Community One Woman and One Child at a Time

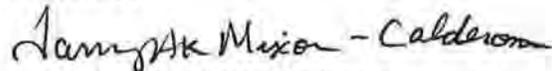
501(c)(3) tax number 58-1029611



As Sun Trust Bank merges with BB&T, we hope a continued working relationship with the staff to continue to provide the Savannah, Georgia area a conscious awareness of good "financial health" through the financial literacy classes and other Sun Trust and BB&T opportunities.

We appreciate Sun Trust's long standing efforts for being a part of the solution to help make a difference in the lives of women, children, and families in this community.

Sincerely,

A handwritten signature in black ink that reads "Tammy A.K. Mixon - Calderon". The signature is written in a cursive, flowing style.

Tammy A.K. Mixon-Calderon
Executive Director



March 28, 2019

Federal Reserve Bank of Richmond

P.O. Box 27622

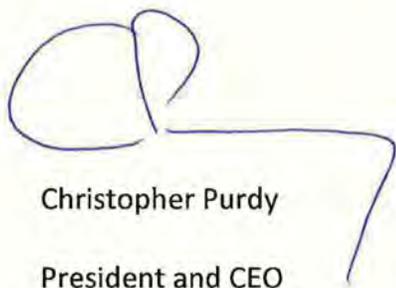
Richmond, VA 23261

To whom it may concern,

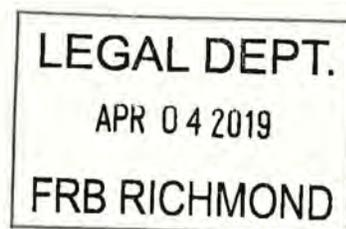
I am writing to provide support for the merger of SunTrust and BB&T. DKT International has been working with SunTrust for over 5 years and we have always been satisfied with the services that SunTrust has offered us. Furthermore, SunTrust has proven itself to be a good corporate citizen, granting \$16.9 million to nonprofit organizations across the nation in 2017.

For DKT International, SunTrust's support has allowed us to increase availability, visibility and affordability of high-quality family planning and HIV prevention options for women and men in the more than 50 countries we operate. We appreciate our relationship with SunTrust and wish them all the best.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christopher Purdy".

Christopher Purdy
President and CEO



dkT is an innovative and adventurous social marketing enterprise that improves people's lives.



RISE

responsibility . initiative . solutions . empowerment

March 29, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, Virginia 23261

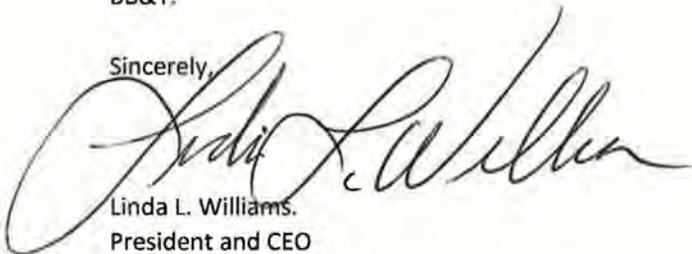
Dear Sir or Madam:

RISE Foundation, Inc. (RISE) is an IRS designated 501©3 non-profit organization that “empowers people to become self-sufficient by building and sustaining human and financial assets.” RISE has provided Over 880 families with financial information and incentives that has assisted them with purchasing their first large asset, encourage over 5000 youth to excel in school, improved the money management skills of 4,000 area employees, and brought together 130 organizations to address predatory lending practices since its inception in August of 1999. RISE’s community development efforts have created over \$8.2 million in assets in the City of Memphis/Shelby County, Tennessee.

Please accept this letter as confirmation of RISE Foundation’s support of SunTrust’s “combining of equals” through their merger with BB&T. SunTrust has been an outstanding community partner for RISE by Supporting the organization with its human and financial capital since I have joined RISE in 2008. SunTrust continues to support RISE through participation in our local ‘Bank on Memphis’ efforts and have helped us through contributions and providing us with an operating account that we have experienced no problems in managing with no audit exceptions. SunTrust has allowed their employees to volunteer as workshop facilitators, as well as hosting one of our landmark activities for high school students “Own My Own” which allows students to simulate the experience that adults have in efforts to manage their resources, that meet their financial needs, while saving both for assets as well as their children’s education. SunTrust has collaborated with RISE in providing these simulated activities at two high schools in our highest poverty zip codes in Memphis – 38126 – 38114. Also, SunTrust has continuously had a representative on the RISE Board of Directors, who also serves on other committees as well. Last but not least, SunTrust provides financial resources to support RISE’s work both through the corporation and foundation. We hope that with the merger that the relationship continues and even grows with the new resources gained.

RISE is appreciative of SunTrust’s commitment to support our communities and their offerings of Banking services to those who really benefit from having their funds in safe hands. We strongly support the merger of SunTrust and BB&T.

Sincerely,



Linda L. Williams,
President and CEO

RISE, INC.
Teaching the meaning of money.

2650 Thousand Oaks Blvd.
Suite 2400
Memphis, TN 38118
(901) 507-6644
(901) 507-6640 fax

LEGAL DEPT.
APR 05 2019
FRB RICHMOND

Federal Reserve

ATTN: Katherine Eike

April 5, 2019

The **Renaissance Indexes Group** (RIG, Claimant) submits this Letter and the enclosed **Rights of Claimant** as part of the CRA Protest Complaint filed against **BB&T Bank**.

The Claimant has petitioned and has been assured by General Counsel that the Agency faithfully executes its sworn duties to enforce all of the components of the banking laws in the laws' entirety and in its full and final perfection.

The FRB does not get to make the determination of the merits of the RIG Complaints – as part of the executive branch of government the Agency does not get to interpret the law – the FRB is **duty bound to enforce** the banking laws– in the laws entirety, the controlling authority of the Court cases and the Department rules – and to investigate the RIG Complaints and implement the enforcement actions.

With respect to the RIG CRA Protest Complaints and “regular” banking Complaints the following rule of law applies:

Pursuant to the banking laws: **ECOA Effects Test** – the prima facie case is established in the following language –

-the party that alleges illegal discrimination need only establish that the actions in question has a disproportionately discriminate effect on members of a protected class, and therefore is discriminatory in effect.

Pursuant to the **FHA Final Rule** the prima facie case for illegal discrimination is established in the following language:

-Any facially neutral action e.g. laws; rules; standards; decisions; policies, practices or procedures including that allow for discretion or the use of subjective criteria may result in a discriminatory effect actionable under the Fair Housing Act and this rule.

The RIG petitions that the banking laws – to include the **FHA Final Rule** be applied in the Agency investigation of the RIG Complaints moving forward to include the present Complaint against **BB&T Bank** – (Attached -pertinent pages 11479-11482) be enforced in their **entirety and in their full and final perfection**. We petition the Rights of Claimant be fully enforced as well. Please find enclosed below.

**Federal Reserve Bank
Katherine Eike**

April 5, 2018

RE: Rights of Claimant

The Claimant submits the Rights of Claimant Letter to the **Federal Reserve Banks - Richmond** in the quest for justice and for Equal rights – to correct, fix and end the continuing illegal discrimination, redlining and denial of Equal access to capital, lending and banking services by the actions (and non-actions), practices and patterns of the named Banks perpetrated against the protected class of black Americans

Central to these failings is the Agency's failure and refusal to honor, respect and to fully enforce the rights of the Claimant – which are outlined below/

Rights To Due Process

These rights of Claimant include the right for full Interviews with the examiners and investigators, the rights for a Zip Code Tour pursuant to the comparative analysis in the banking categories between the two sets of Zip Codes as outlined in the Complaint; the rights for a real Investigation – i.e. the right to the **Agency** investigators to be on the ground in Houston.

This also includes the right to refute – **Claimant Refutations Letter** - the Banks' "answers" to the Illegal Discrimination Claims and the right to file Freedom of Information Act petitions for "Confidential Materials and Exhibits" the right to receive the Confidential Materials pursuant to Petition; and the right to full exhaustion of all administrative and judicial filings and remedies – to include appeals to the Federal District Court – prior to the final decision by the Agency on any Bank Applications

In order to be effective in the Refutations the Claimant has the right to receive the Confidential Information and Exhibits that are approved – prior to any Agency decision on the Banks' Application(s). It does not serve - indeed this practice denies – the full rights of Due Process of the Claimant to receive the Confidential Information – after the Banks Application has been approved

The right to submit additional Claimant Refutation Letters upon receiving "Confidential Materials" and the right to receive the direct and truthful answers from the Bank \

Rights to Interviews As the **Renaissance Indexes Group** is chief Claimant and chief Complainant in the CRA Protest and banking complaints filed with the **Federal Reserve** and as communications with the Agency has been uneven and spotty at best and as the Claimant has the right to know who the investigators and examiners assigned to the Complaint are as well as their knowledge of the credit needs and of the Neighborhoods of the protected class of black Americans in the specified Zip Codes and as Interviews of the complaining witness by Agencies of the Enforcement branch of government are part and parcel of the Investigation proceedings and as the Claimant is entitled to the rights of full Due Process -the Petition for Interviews is not unreasonable and is nowhere strictly forbidden in the Rule of law – and as the Agency does not have the legal right to circumvent the Due Process Rights of Claimant – the Claimant petitions to schedule the initial Interview in the short term pursuant to the CRA Protest Complaints filed against **the Banks**.

In the alternative, the Agency is duty bound to provide the clearly articulated statute or regulation that specifically forbids the Agency investigators and examiners Interviews of the Claimant – as this is common practice in the other banking regulatory Agencies and with all the other federal Agencies.

Where the Agency fails to provide the clearly articulated statute or regulation that specifically bars the Interview of the Claimant – we need to schedule the initial Interview in Houston at the **Federal Reserve Bank** office on Allen Parkway.

Rights To Honest Investigations

This right includes the right to receive **honest, truthful and direct** answers from the Bank to the Illegal Discrimination Claims as outlined in the Complaints. The right to petition the Agency that where the Bank refuses or otherwise fails to directly and honestly answer the **Illegal Discrimination Claims** the Claim remains **intact** and is certified as true. Included in this right is the right to independent Agency investigations – that stand alone and are independent of the Banks’ “representations”, “replies”, “responses” and “addressing””. The Bank does not get to investigate itself –and to lead the Agency into the investigation.

Rights to Frame Complaints

The Claimant has the right to frame the Complaints. The Complaints specifically name the **specific aggrieved parties** - the individuals, households and businesses of the protected class of black Americans **inside** of the black American Neighborhoods in the specified Zip Codes in Houston (and in Dallas) The Complaints call for the comparative analysis in all the banking categories between the two sets of Zip Codes

in Houston and in Dallas– and what is found and **not found** in the black American Neighborhoods in the specified Zip Codes.

The Complaint is anchored in the **physical address reality** of the Banks branches, bank financed developments, and Community Development Loans, in the

geographical dollar amounts in lending – in all of the lending categories and in the Bank dollar amount outlays in advertising, marketing, promotions of products, outreach to Neighborhood Groups and in charitable contributions pursuant to the overarching Claim that the **Bank has avoided doing business** in the black American Neighborhoods in Houston and has denied the **rights of Equal full enjoyment** of Equal rights secured under the CRA ECOA, FHA, Title VIII – 1968 Civil Rights Act and under the Equal Protection Clause – 14th Amendment – US Constitution – to the protected class of black Americans, in Houston.

The Banks named in the Complaints have consistently denied the full rights to be informed of the terms, conditions and options in the lending and credit products and have consistently failed to apply all (or any) of the Discretionary Accommodations

Neither the **Agency** nor the Bank has the right to **reframe, remake and to reconstitute** the Claims to suit its own purposes. Neither the Agency nor the Bank has the right to bring in findings that are **found outside** of the Complaint – as in “LMI census tracts” and minority census tracts” and “majority-minority census tracts” that are all **outside** of the black American Neighborhoods to add to the equation which makes the Complaint unrecognizable to the Claimant

Rights to Public Hearing

The RIG petitions for the public hearing pursuant to the banking complaint filed against **the Banks** – as the Hearing is also part of the full Due Process Rights of Claimant.

Rights of Community Contact

The RIG petitions to be the certified Community Contact by the Agencies – pursuant to the CRA Protest and banking complaints filed against the Banks named in the RIG Complaints.

Claimant challenges the Agency to highlight where in the statutes, regulations or Rule of Law where any of the above outlined Rights of Claimant are **strictly forbidden**.

This Letter represents our Constitutional rights to petition Congress **for redress of grievances** and for the correction of the containing failings of the Agencies to faithfully execute their sworn duties and the continuing Agency failures to enforce all of the

components of the banking laws in the laws' entirety and in the laws' full and final perfection – and for the Agencies to honor and to fulfill the Rights of Claimant – as outlined above.

This continuing tragedy of failings by the Agencies can only be corrected by the lawmakers – in the form of strong aggressive Directives to the Agencies – beginning with the **Federal Reserve** – to faithfully execute its sworn duties of supervision and of enforcement of the banking laws –in the laws' entirety and in the laws' full and final perfection and to take potent enforcement actions against the Banks named in the RIG Complaints –

to restore the full enjoyment of rights to the aggrieved parties – the protected class of black Americans - pursuant to the **banking laws** – Community Reinvestment Act, Equal Credit Opportunity Act, Fair Housing Act – to include the Final Rule, Home Mortgage Disclosure Act, Fair Lending Laws, FTC Act – Section 5 Regulations B/C

pursuant to the **Civil Rights laws** – Title VIII – 1968 Civil Rights Act, to the aggrieved parties - the protected class of black Americans -

pursuant to the **Department Rules** – (HUD) FHA Final Rule

pursuant to the **controlling authority of the Court holdings** – US V Chevy Chase FSB, US V Hudson City Savings Bank, US V Guardian Savings Bank US V Midland States Bancorp and US Supreme Court holding in TDHCA V ICP, Inc.

This is the Civil Rights issue of our time – and one whose time has come; one that we cannot postpone and one that we must win.

POSTSCRIPT The Renaissance Indexes Group has arranged a Conference Call with the US Congress Rep Lizzie Fletcher and Rep Maxine Waters – Chair of the House Financial Services for mid to late April – in reference to the continuing enforcement lapses of the FRB – we need to know who will be handling the Conference Call to answer the Questions on the FRB's end.

In The Relentless Pursuit of Justice,

Barry Simmons

Chairman / RIG

7000 Fonvilla Street – Suite # 2310

Houston, Texas 77074

(713) 294-0570

rendexes@gmail.com

Eike, Kathy

From: Manahan, Colleen <CManahan@cfymca.org>
Sent: Monday, April 08, 2019 6:54 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Cc: David C. Stahl (david.stahl@suntrust.com); Wilcox, Dan
Subject: [External] In Support of SunTrust

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To Whom It May Concern:

The YMCA of Central Florida has been doing business with SunTrust bank for over 50 years. Many of their executives have held positions on our Board of Directors, including Board Chair, over those years and still today. Currently, we are partnering with them to help find funding to help bring YMCA services to underserved families on the west side of Orlando. They have been a true partner for us, as well as the entire Central Florida community, and the YMCA is truly grateful for their support, leadership and vision.

Our Board and Executive Leadership team is fully in support of this merger and feel that it will only help enhance the services and resources that can be brought to our local community and organization.

Sincerely,

Colleen Manahan
Chief Financial Officer
YMCA of Central Florida
433 North Mills Ave, Orlando, FL 32803
P 407 896 9220 ext. 268 D 407 895 8671 F 407 896 4247
E cmanahan@cfymca.org W centralfloridaymca.org

Responsibility : Achiever : Connectedness : Arranger : Strategic



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Eike, Kathy

From: Melissa Nelson <melissa.nelson@unitedway-sjc.org>
Sent: Monday, April 08, 2019 4:27 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Subject: [External] Suntrust Support

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Attention: Federal Reserve Board and the Federal Deposit Insurance Corporation (FDIC)

United Way of St. Johns County, as part of the network of United Ways in the state of Florida and U.S., is greatly appreciative of the commitment and investment made by SunTrust and BB&T in our area.

We value their desire to positively impact our community and their commitment to increase involvement as an even more active partner in the future. United Way is best able to achieve our community goals with the support of our business partners.

An important example of this the funding made available to United Way-SJC for our RealSense program by SunTrust. Through this program, United Way of St. Johns County provides free tax prep to community residents. In year one UW-SJC RealSense completed 100 returns. Now, in year three, over 500 returns will be filed for those that need it the most, resulting in a real and tangible difference to individuals and families.

We rely on SunTrust and BB&T as business partners to provide United Way-SJC the tools that allow us to work together and create measurable impact in our communities.

Thank you for your consideration,

Melissa Nelson, President / CEO
United Way of St. Johns County



904.829.9721 office 904.910.6442 mobile
117 Bridge Street PO Box 1007
St. Augustine FL 32085-1007



April 8, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

To the Board of Governors:

SunTrust Banks, Inc. regularly demonstrates their investment in the needs of the Hampton Roads community through their support of ForKids' mission of breaking the cycle of homelessness and poverty for families and children. Since 2014, the SunTrust Foundation has provided \$23,500 in grants to the ForKids Children's Education program as well as providing in-kind donations such as toys for our annual holiday drive. In addition, the SunTrust Foundation's partnership with the United Way reaches ForKids annually through local program grants.

As one of the largest year-round providers of homeless services for families in Virginia, ForKids is committed to providing housing solutions to assist the community's most vulnerable families. Our extended services, spanning over 3,000 square miles and 14 localities, touched the lives of 63,000 individuals last year.

The contributions of the SunTrust Foundation have helped ForKids provide afterschool education programs to over 411 students experiencing homelessness in South Hampton Roads last year. Through the *Beyond the Bell* program, elementary and middle school students participate in expanded learning opportunities and positive youth development outcomes in a safe space. With the support of SunTrust, tutoring and enrichment activities close academic gaps, while positive role models help students gain the confidence to succeed. Last year, 97% of students demonstrated improvement in math and/or reading and 95% were promoted to the next grade at the end of the school year. By supporting children's educational success in their younger years, SunTrust helps us reduce the trauma of homelessness now and decrease the likelihood of repeated experiences of homelessness in the future.

We rely on community partners like SunTrust, and we value their ongoing commitment to ForKids. We wish them well in their endeavors.

Sincerely,

Thaler McCormick
Chief Executive Officer

pc: FDIC, Atlanta Regional Office

Eike, Kathy

From: Karen Klick <KKlick@piedmonthousing.org>
Sent: Monday, April 08, 2019 2:31 PM
To: RICH BankSup Applications Comments
Cc: BankMergerApplication@fdic.gov
Subject: [External] BB&T comments

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Dear Federal Reserve Bank of Richmond,

I am writing to provide comments in support of the work BB&T is doing in our community. For several years, BB&T has supported Piedmont Housing Alliance's mission to provide affordable housing solutions in the Charlottesville area. BB&T has been a financial supporter of our housing counseling work, has helped us upgrade the community center classroom at one of our affordable apartment communities, and has also brought their BB&T bus to that same community to help residents learn more about free ways to prepare their taxes and improve their credit. We appreciate the commitment BB&T has demonstrated and look forward to growing our partnership. Thank you for the opportunity to provide these comments.

Best,
Karen

Karen Klick
Deputy Director

Piedmont Housing Alliance
682 Berkmar Circle
Charlottesville, VA 22901
Office: 434-817-0662 | Email: kklick@piedmonthousing.org
<https://piedmonthousingalliance.org/>

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April 5, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622, Richmond, VA 23261

SunTrust Bank has been a longtime and stalwart supporter of financial literacy for youth through Junior Achievement of North Florida. SunTrust Bank already has a solid culture of community support and a merger would only increase their capacity to reach more young people and spread even wider the already significant impact they are having in our area.

Junior Achievement volunteers such as those from SunTrust Bank go into K-12 classrooms and present Junior Achievement programs that include lessons on saving, budgeting, credit, borrowing, credit cards, investing, and a myriad of other financial education offerings that will better prepare young people to succeed in the global economy. Without volunteers such as those from SunTrust, our programs could not be provided to the 60,000 students we reach annually.

Over the past two years alone, SunTrust volunteers have taught over 100 Junior Achievement programs and reached over 2,000 young people.

SunTrust also supports their volunteers by providing the funding that underwrites the purchase of the Junior Achievement materials used in the classroom. This investment of both time and treasure makes them a very valuable partner in our effort to reach more and more young people.

Sincerely,

Steve St. Amand
President

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Rob Spindlin*

MEMBER

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Gary Thrash

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Tommy Turner

MEMBER

Eike, Kathy

From: Joyce, Tim "TJ" <joycet@ymcarichmond.org>
Sent: Monday, April 08, 2019 1:45 PM
To: RICH BankSup Applications Comments
Subject: [External] Comments of praise for Sun Trust in Richmond

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I thought I'd use a subject title that would grab your attention. I'm sure you are getting quite a bit of correspondence concerning this merger of two significant and strong organizations.

As you can note below, my name is Tim Joyce and I serve as the President and CEO of the YMCA of Greater Richmond. For the 6 years I've held my seat, Sun Trust and their leadership have been nothing but phenomenal in support and guidance of our organization; actually the entire community. First from professional services, they deliver great business acumen to our association. But even more so is the engagement and support through volunteer leadership and philanthropic support of the Y. From serving on boards and committees, to bringing their teams to serve through volunteering opportunities at Y locations, to helping us whether in direct philanthropic financial support or being an advocate to the community for such support, numerous executives and front line staff have given tirelessly to the YMCA and many other organizations in so many ways. Here in Richmond the Sun Trust Leadership get it. They know what it truly means to be part of a community and do your part to leverage all assets for a great good for all. That is what the Y stands for and it is an honor to work with so many dedicated and mission centered leaders from Sun Trust.

I wish you well in the merging of these two organizations. It is my deepest hope that they continue to invest time, talent and treasures back into their communities in even greater ways from this union. Time will tell. With that I remain,

Tim Joyce

Tim Joyce
President & CEO
YMCA of Greater Richmond
Office: 804-474-4313
Fax: 804-643-6294



FOR YOUTH DEVELOPMENT®
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY



160 Newtown Road, Suite 102
Virginia Beach, VA 23462

April 8, 2019

Dear Sir,

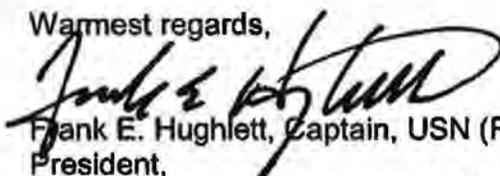
As the President of Junior Achievement of Greater Hampton Roads I would like to positively endorse the merger between SunTrust Bank and BB&T. Junior Achievement of Greater Hampton Roads has reached over 55,000 students in the last five years and that would not have been possible without the strong partnership JA has with SunTrust Bank. SunTrust has been a mainstay in providing volunteers and financial support in delivering Junior Achievement curriculum in area schools. With the addition of BB&T this impact can only increase. As a non-profit JA relies heavily on its business partners for financial and volunteer support to be truly effective in altering the trajectory of young people's future.

However impressive as those numbers appear they only represent 4% of the total 300,000 students across Hampton Roads. It is anticipated that the merger between BB&T and SunTrust banks will greatly expand JA's reach into the seven highly independent and disparate communities across Hampton Roads. With the increased footprint and resources resulting from the merger and anticipated expanded partnership it is expected that JA will be able to expand its presence into new neighborhoods increasing its market share of needy students.

Junior Achievement is the world's largest organization dedicated to giving young people the skills and knowledge they need to thrive in our global economy. Junior Achievement's exciting curriculum teaches K-12th grade students about workforce readiness, entrepreneurship and financial literacy. Through these essential programs students are inspired and prepared to be successful in the 21st century. The delivery of these life skills to the children of Hampton Roads will not be possible without the great support of area merchants and businesses.

If you have any questions about Junior Achievement feel free to contact me at 757-642-7599. We look forward to developing these increased new partnerships subsequent to the merger of these two fine financial institutions that can only have a positive effect on the Hampton Roads Community.

Warmest regards,



Frank E. Hughlett, Captain, USN (Ret)
President,
Junior Achievement of Greater Hampton Roads



RIVER GARDEN | **Hebrew Home**
SENIOR SERVICES | Wolfson Health & Aging Center

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Chief Financial Officer
Jim Richman, LCSW, LNHA
Chief Operating Officer
Mauri Mizrahi, PT, GCS, LNHA
Associate Administrator
Elliott Palevsky, MA
Chief Executive Officer Emeritus

Via Email to:
Comments.applications@rich.frb.org
BankMergerApplication@fdic.gov

April 8, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

and

Federal Deposit Insurance Corporation
Atlanta Regional Office
10 10th Street, NW, Suite 800
Atlanta, GA 30309

Regarding: SunTrust and BB&T Merger

To Whom It May Concern:

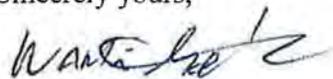
River Garden Hebrew Home for the Aged, a non-profit human services organization with a 74-year history of excellence, is hereby writing in strong support of SunTrust Bank and its proposed merger with BB&T. River Garden has been a SunTrust client since 2011. SunTrust is a mission-driven organization with an unwavering commitment to its clients and community. Over these years we've come to appreciate the organizational culture of SunTrust and I'm confident that its culture of excellence will align well with BB&T.

With over 50 percent of River Garden's nursing home residents medically indigent and receiving Medicaid benefits, we depend upon active community support to be able to provide the highest quality care to all, regardless of an individual's ability to pay. SunTrust's support of River Garden is extraordinary and its commitment to community engagement outstanding.

In addition to SunTrust's support of my agency, they're also a major financial supporter of OneJax, an Institute of the University of North Florida that promotes diversity and inclusion throughout Northeast Florida. I'm especially proud of SunTrust's support for OneJax.

Please do not hesitate to contact me directly if I can be of additional assistance.

Sincerely yours,



Martin A. Goetz
Chief Executive Officer



EIGHT-TIME RECIPIENT OF THE PRESTIGIOUS
GOVERNOR'S GOLD SEAL AWARD
FOR EXCELLENCE IN LONG-TERM CARE



Eike, Kathy

From: Ted Granger <tgranger@uwof.org>
Sent: Monday, April 08, 2019 11:51 AM
To: RICH BankSup Applications Comments
Subject: [External] SunTrust/BB&T Merger - United Way of Florida Letter of Support

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To Whom It May Concern....

Florida has been the beneficiary of extraordinary community support and engagement by SunTrust and BB&T for many years and the United Way of Florida, representing Florida's 29 United Ways, urges that their merger proposal be approved.

The myriad ways in which SunTrust and BB&T have supported the United Way and other efforts to improve the communities they serve are too numerous to list here. Suffice it to say that their corporate culture has resulted in their employees acting as volunteer United Way Board members and officers and leading numerous community ventures to donning their work clothes and assisting in Days of Caring where they have spruced up schools and community parks, worked in homeless shelters, helped young children learn to read, among many more.

Whenever United Ways and our partners talk about corporations that truly represent the essence of good corporate citizenship, SunTrust and BB&T are at the top of the list. Consequently, the United Way of Florida strongly supports the merger of SunTrust and BB&T and urges its approval.

Thank you.....TGG

Ted Granger, President
United Way of Florida
307 E. 7th Ave.
Tallahassee, FL 32303
850-488-8276 – Office
850-556-5082 – cell
tgranger@uwof.org

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March 29, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

Federal Deposit Insurance Corporation
Atlanta Regional Office
10 10th Street, NW, Suite 800
Atlanta, GA 30309-3849



RE: Merger Application – SunTrust and BB&T

To Whom It May Concern:

Please accept this letter in support of the merger application submitted by SunTrust and BB&T. Given the long standing and significant support of the community by SunTrust, we are excited about the prospects for the community should this merger be approved.

BB&T and SunTrust have long been supporters of United Ways across the country in those markets in which they operate. Here in Greater Orlando, I want to speak specifically to the relationship, indeed partnership, between SunTrust and Heart of Florida United Way. I would submit to you that the way SunTrust operates and engages within our communities should serve as a model for other financial institutions across America.

SunTrust management makes clear that community service and engagement is part of the corporate culture. Senior managers can be found serving on non-profit boards, committees and in other volunteer capacities throughout the area. Their service includes general support as well as 'skill based' volunteering as they lend their business skills, financial acumen and life experiences to many causes. The employees of SunTrust regularly make themselves available for various volunteer activities from packaging hygiene kits for the homeless and back packs for low income school children to teaching financial education classes to single moms and reading to school children.

While I could provide many examples of SunTrust's engagement and generosity, I want to focus on just three significant contributions that SunTrust has made to this community and to the Heart of Florida United Way.

First, do you remember the day you got accepted to college? Was it a struggle getting in because you were the first in your family? Were you wondering how you were going to pay for it? Did you wonder what your life was going to be like if, and when, you graduated? Did you also wonder what life was going to be like if you did not graduate? Thousands of students face those struggles and ponder those questions every day here in Central Florida. We found that the number one reason a student did not finish their college education was not the lack of resources for tuition or books. Rather, they were forced to drop out when 'life simply got in the way', meaning when those perceived "simple" challenges in life arose. This included a car breaking down, the loss of a part time job or a family event such as a member falling ill. Because of these instances, students were dropping out of school and their lives took a significant downward turn. The results were long lasting adverse impacts leaving them with a far different economic future than what they had dreamed. We also found that for an average of \$720, these circumstances could be changed...forever. SunTrust partnered with Seminole State College and Heart of Florida United Way to create a program called "Destination Graduation". Its goal is to keep these students in school and graduate by helping them through those moments when life simply 'got in the way'. Because of SunTrust's generosity, their vision and their faith in people, we are proud to say that more than 980 students have received services and guidance. That's nearly 1,000 students whose lives who have been forever changed! They are on the path to financial stability and economic prosperity. They will earn their degrees and go on to contribute to our communities with their labor, skills and intelligence. They will be able to provide for their families in ways they could not have imagined. They struggled to hang on to those dreams when 'life got in the way'. SunTrust made this possible for these students, their families and their futures.

Second, when natural disasters and emergencies arise and call upon an entire community to come together to literally save lives, SunTrust responds. In 2017, Hurricane Irma tore through Florida. Shortly thereafter, Hurricane Maria engulfed the island of Puerto Rico leaving behind devastation never seen before. The entire island was without power, buildings were destroyed, schools were closed and many people fled the island to save their lives. Heart of Florida United Way has a sister-city relationship with Fondos Unidos de Puerto Rico. Because of that, and because Central Florida is home to the second largest concentration of Puerto Ricans in the United States, we organized and prepared for the anticipation of evacuees leaving the island to come to Orlando. In doing so, an evacuee center was set up at Orlando International Airport. We, along with several other organizations, were at the airport to receive these evacuees who had just experienced the devastation of Hurricane Maria and had fled on humanitarian flights. In order for us to greet the 1,800 evacuees per day that started arriving, and continued for weeks afterward, we had to call upon volunteers from the community. Starting with our corporate partners, SunTrust was one of the first companies to respond. Immediately, they provided dozens of their Spanish speaking employees to volunteer at the airport with us. Many of these SunTrust team members had family still in Puerto Rico and their passion, empathy and commitment made a huge difference in serving the evacuees. Indeed, Heart of Florida United Way was the only organization providing emergency housing to the evacuees. In the end, we provide more than 3,000 hotel nights to over 1,000 evacuees along with other services they needed to stabilize their lives. Sometimes, it was simply listening and providing care and comfort to those who wanted to share their story of devastation. It was the SunTrust team that was one of the first to answer the call to serve. And serve they did! Working in six hour shifts, seven days a week, we were able to speak with nearly 10,000 evacuees. And the SunTrust team contributed hundreds of volunteer hours to make the effort a success. The caring and compassion of the SunTrust team played a significant role in our ability to meet the needs during this difficult time.

Finally, in the role of good governance, SunTrust has always supported many organizations through Board service. Non-profit organizations need smart, engaged, thoughtful and community minded people to serve as Board Members. Heart of Florida United Way has been quite fortunate to have some of SunTrust's most senior team members join our Board. In the past we have had the pleasure of having SunTrust's market president, the director of the SunTrust Foundation, and other senior staff. At this time, we are fortunate to have Sandra Hostetter, SunTrust's Central Florida Market President and Tammy Paycer, Senior Vice President of Community Development as Board Members. They are engaged Board Members who contribute their time and talents to the betterment of United Way and to the community at large.

The success of corporations gets measured in many different ways. As communities, we often measure their value as to how many jobs they provide and how well those jobs pay. We also measure them as to what type of corporate citizen they are and how they engage in the community. Are they generous with their employees' time in the area of volunteering? Do they lend their skills to the community in addressing challenges such as literacy, financial empowerment, youth mentoring, etc.? Do they provide financial support to worthy causes that will make lasting change? If these are the measures by which we value a corporation's citizenship, then I can say, without hesitation, that SunTrust is a valued community partner, an outstanding corporate citizen, and an organization that has made this community stronger and richer in all senses of the word.

Please know we wholeheartedly support the merger application of SunTrust and BB&T as we believe that it will continue to strengthen this Central Florida region.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffery J. Hayward". The signature is stylized with loops and flourishes.

Jeffery J. Hayward
President and Chief Executive Officer



18 North Terry Avenue
 Orlando, FL 32801
 ☎ 407 426 1250
 📠 407 426 1269
 centralfloidahomeless.org

April 2, 2019



Federal Reserve Bank of Richmond

P.O. Box 27622

Richmond, VA 23261

To whom it may concern:

SunTrust Bank has provided banking services to the Coalition for the Homeless of Central Florida for many years. SunTrust Bank has been and continues to be a strong supporter of the Coalition for the Homeless of Central Florida. We understand the proposed merger of SunTrust and BB&T will serve to enhance the deep commitment and investment the combined bank will continue to make to the Coalition and the communities it serves. We have every expectation that together, SunTrust and BB&T plan to be an even more active community partner. We look forward to the merger and the opportunities this may bring to our community.

Kind Regards

John Hearn

President/CEO

Coalition for the Homeless of Central Florida

T. Todd Pittenger

Board Chair

Coalition for the Homeless of Central Florida

WITH SUPPORT FROM





April 1, 2019

Federal Reserve Bank of Richmond
Post Office Box 27622
Richmond, VA 23261

Federal Deposit Insurance Corporation
Atlanta Regional Office
10 10th Street, NW, Suite 800
Atlanta, GA 30309-3849

Re: SunTrust and BB&T Merger

Dear Sir/Madam:

Dr. Phillips Charities is a nonprofit organization that provides significant grants to 501(c) organizations for capital projects and invests in the local Central Florida community. Our company has had a major economic and philanthropic presence in Central Florida since the turn of the 20th century and has had a continuous banking relationship with SunTrust since its predecessor (SunBank) merged with Florida National Bank – Orlando, where our accounts were established in the 1930's after the renowned bank failures occurred in Florida during the late 1920's.

We have enjoyed our banking relationship with SunTrust through all of the past mergers that have taken place and would like to take the time to comment about the high level of trust that our organization places in its banking relationship with SunTrust and to make you aware of our belief that the merger being proposed between BB&T and SunTrust ("a merger of equals") will only strengthen the combined organization's ability to provide quality banking services to our company, the Central Florida community and its larger customer base throughout the United States. From our perspective, SunTrust has used each of its past mergers to invest in its infrastructure, both from an automation and personnel perspective. As the rate of technology continues to accelerate and impact the financial services sector, it is imperative that SunTrust continue to innovate and invest in technology and its personnel in order to provide the highest level of banking services to a broad range of demographically diverse commercial and individual customers.

Speaking from the nonprofit sector, we are proud to partner with SunTrust, who has a proven track record of providing mentoring and financial literacy programs for children in programs such as the Junior Achievement Business Academy. SunTrust also partners with regional CPA firms and attorneys to provide high-level training to the nonprofit finance professionals on critical topics such as steps to reduce the likelihood of fraud in nonprofit organizations. Most importantly, we witnessed SunTrust stepping up during a financial downturn to fund an innovative loan in an economically disadvantaged area to ensure quality housing for low income families when another bank decided not to honor its loan commitment due to an unfavorable rate fluctuation.

7400 Dr. Phillips Blvd. • Orlando, FL 32819-5146
P.O. Box 692709 • Orlando, FL 32869-2709
Tel 407/422-6105 • Fax 407/422-4952 • www.drphillips.org

"Enriching the Community With the Fruits of our Labor"

SunTrust and BB&T Merger

April 1, 2019

Page 2

As part of our history, it is important for us to honor the Dr. Phillips family. Our documents indicate that Dr. P. Phillips' heir, Howard Phillips (a Phillips Exeter and Harvard graduate), was a Federal Reserve Bank Board Member (Jacksonville, FL Branch) post-World War II from 1948 to 1952. While Howard Phillips passed away in 1979, we are certain that he would be proud of the success that Florida National Bank – Orlando gained through its merger with SunTrust and appreciate the opportunity to provide the Federal Reserve Bank and FDIC with the foregoing comments on the proposed SunTrust and BB&T merger.

Sincerely,

DR. PHILLIPS, INC.

A handwritten signature in blue ink that reads "Ken Robinson". The signature is written in a cursive, flowing style.

Kenneth D. Robinson
President and CEO

cc: Sandy Hostetter
Scott Cathcart



FAMILIES MOVING FORWARD
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Ryan Fehrman
Executive Director

April 5, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

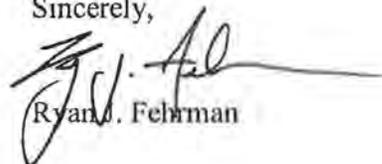
Dear Sir or Madam,

I am writing in support of the proposed merger between BB&T and Suntrust. I am the executive director of Families Moving Forward (www.fmfnc.org), a 501(c)3 nonprofit in Durham, NC that provides emergency shelter and services to homeless families with children that are experiencing homelessness. Suntrust has been a strong corporate supporter of the agency and our families for many years and has committed both financial resources and real volunteer time to address the needs of the families that we serve. I believe that the merged entity will continue to be engaged with our work and will have the capacity to do even more for low income and at risk populations in our community.

In the last four years, Suntrust has made financial gifts to the agency ranging from \$2500 to \$10,000 annually. They are our second largest donor in the banking sector and have consistently increased their gifts over the last three years. While many corporations in RTP, Durham and the Triangle have the capacity to make gifts of this size, very few support direct services like emergency shelter and case management at the level demonstrated by Suntrust. Beyond funding, Atrice Campbell Long, the Community Development Manager in Suntrust's Durham office has been a board member for the agency since 2012 and for the last two years has served as our board president. Atrice's leadership and engagement has been invaluable during the agency's merger in 2016 and through two strategic planning processes. People like Atrice give Suntrust a very good name in our community.

I truly believe that the merger between BB&T and Suntrust will be beneficial for Families Moving Forward and the community at large. I have seen over an extended period that Suntrust has a real commitment to our state and city and I know that BB&T has a similar reputation in the Triad. I have seen with my own eyes that mergers can leverage positive impacts beyond what either organization can create separately and am proud to support this marriage between two esteemed banking institutions. I can be reached at ryan@fmfnc.org or by phone at 919-683-5878 ext. 21 if you would like to discuss this issue in more detail. Thank you for your consideration.

Sincerely,



Ryan J. Fehrman

FINDING THE WAY HOME

Eike, Kathy

From: Tracey Dixon <director@lynchburgdailybread.com>
Sent: Monday, April 08, 2019 10:47 AM
To: RICH BankSup Applications Comments
Subject: [External] Suntrust merger

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PLEASE NOTE: This email is not from a Federal Reserve address.
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As a non-profit soup kitchen serving over 75,000 meals annually, we are so grateful to our local SunTrust Bank and officers. SunTrust has financially supported us for many years, helping to provide much needed serving and cleaning supplies for our donated food. I can also speak personally about the wonderful enthusiasm of Lynchburg SunTrust President Kathleen Graves, who has assisted us by serving in the kitchen and supporting many important community causes. Kathy and I have also volunteered together through the Lynchburg Morning Rotary Club, and I've admired her efforts on behalf of the Board of the Free Clinic of Central Virginia. We are very grateful for our local SunTrust Bank!

Sincerely,
Tracey

Tracey Dixon, CFRE
Executive Director
Lynchburg Daily Bread
721 Clay Street
Lynchburg, VA 24504
Phone: (434)845-5703
Fax: (434)845-5411
www.lynchburgdailybread.com
Feeding the hungry since 1982
Twitter: @lyndailybread

Eike, Kathy

From: Packard, Richard L. <RIPackard@FDIC.gov>
Sent: Wednesday, March 27, 2019 8:44 AM
To: Eike, Kathy
Subject: secure email: Excess Deposit share - BB&T / SunTrust proposed merger
Internal Board-routing markings only

From: jay cunningham [mailto:jay.cunningham@hotmail.com]
Sent: Thursday, February 21, 2019 12:02 AM
To: Rebeca.RomeroRainey@icba.org; terry.jorde@icba.org; karen.thomas@icba.org
Cc: jszyperski@chesbank.com; tzimmerman@standardbankpa.com; Transparency
Subject: Excess Deposit share - BB&T / SunTrust proposed merger

I am writing to site that the proposed merger between BB&T and SunTrust is, in my opinion, and gross continuation of the market share grab that US regulators have long been lax in enforcing. The proposed merger will only act to further concentrate an already near-monopolistic banking industry in the US. The proposed merger will bring excess deposit share to BB&T / SunTrust, exacerbating the market controlling share exercised by Bank of America, JPMorgan, and Wells Fargo. Indeed, I argue that the adjusted share of Bank of America, JPMorgan, and Wells Fargo has already effectively exceeded most state deposit share caps, and that allowing the BB&T / SunTrust merger to proceed will only further excess market power in the United States, and prove to be detrimental to consumers. I trust that the ICBA and its members are working diligently to dissuade regulators from approving the merger. Further, I encourage community banks, as well as the ICBA and ABA, to seriously consider regulatory pressure to revamp the deposit share regulations. Industry consolidation in the US broadly has gone too far, and banking is no exception.

Sincerely,

Jay Cunningham

Concerns Regarding Proposed BB&T / SunTrust Merger

I work for a long-only asset management firm (AUM of \$24b) as the research analyst covering Financial Institutions. My primary coverage for the past almost 20 years has been US banks. As a long-term investor, with an average holding period of 7 years, we seek to invest in firms with sustainable competitive advantages. However, differentiation across US banks, in our opinion, continues to be difficult (though a select few are truly unique). Over 20 years of (largely) bank investing I have found one constant – the very large banks continue to cede share to the small(er), more service oriented banks. I applaud the community banks of the US, their support of local economies, and the work you do to support them. But you and the banks you support seemingly have an uphill battle, with regulators pushing greater consolidation.

The recent merger announcement between BB&T and SunTrust has been touted as a blockbuster deal. Wall Street has said that the deal is exactly what the industry needs, and the management teams have extolled the virtues of the new company (which will be the 6th largest bank in the US). But lost in the discussion are the substantial gains in deposit market share that the combined banks (hereinafter NewCo) will command. Indeed, I estimate that the deposit share of NewCo will be approximately 6.8% in addressable markets (and 8.65% on an adjusted basis¹).

The deposit share gains that NewCo will realize is a continuation of the market share grab that the large banks in the US have been exercising. And while the estimated adjusted market share is very meaningful, the estimated strength in individual MSAs is even more telling. Indeed, I find that NewCo will have deposit market share greater than 30% in 10% of its MSAs (or in 20 of 197 MSAs), 20 - 30% in 38 markets (or 19% of total), and greater than 10% in fully 65% of addressable, core MSAs.

Perhaps some will argue that this increased deposit share is needed in order to effectively compete against the behemoths of Bank of America, JPMorgan, and Wells Fargo (hereinafter The Big 3). These three banks have an estimated adjusted market share of 30.2% across applicable MSAs, and 32% in the Top 100 MSAs². Very reasonably The Big 3 exercise monopolistic pricing power, and such is evidenced by examining deposit pricing.

The Federal cap on deposit share is 10%, and most states have a 30% cap. It appears that The Big 3, and to a limited degree NewCo, are creatively skirting the deposit share caps. The Big 3 already have an adjusted share of greater than 30%, and it is estimated that in 25% of The Big 3's applicable MSAs the average adjusted deposit market share is 43%.

This excessive market power must be stopped. Federal banking regulators have simply become too lax in enforcement. Further, and alarmingly, this tacit encouragement of monopolization is a national issue, and multiple sources have begun to voice concerns³. The gross consolidation of American industries has not led to economic benefits, nor has it allowed consumer gains. Rather it has simply concentrated market power, lessened healthy competition, and negatively impacted average businesses (banks).

NewCo suggests that the combination will enhance buying power, enable greater investment in technology, and help spread regulatory burdens. Community banks certainly would relish such improvements. The regulatory burdens on banking only increase (though with some reprieve from the current administration). Rate pressures continue, and industry NIMs, while up from the nadir, are flattered by the excessive free deposits The Big 3, and others, command, not to mention the excessively low rates The Big 3 control on interest bearing accounts.

The BB&T / SunTrust proposed merger is a step in the wrong direction. It allows enhanced market power at the top of a grossly consolidated industry. Regulators should be fighting *against* this consolidation. Regulators should be encouraging more competition, and less market power at the top. I trust that the ICBA, and its constituents, are fighting the proposed merger. Not only does this merger lessen competition, and likely harm consumers, but I argue that it flies in the face of state deposit caps (and The Big 3 have already done, in my opinion). I am not necessarily advocating such measures as those floated by Senator Brown (D-OH), but I do firmly believe a new view of deposit market share is greatly overdue.

1. Deposit share figures per SNL Financial (S&P Global Market Intelligence). Total deposit market share based on reported deposit figures for all footprint MSAs as of June, 2018. Adjusted market share removes BB&T Main office in Winston-Salem, SunTrust Main Office in Atlanta, and excludes New York-Newark-Jersey City MSA. Deposit share estimates do not adjust for NewCo planned divestitures.
2. Adjusted deposit share excludes Main offices, as well as excessively outsized offices across all reported MSAs.
3. William Galston and Clara Hendrickson, "A policy at peace with itself: Antitrust remedies for our concentrated, uncompetitive economy," Brookings Institute, January 2018. Gauti Eggertsson, Jacob Robbins, Ella Getz Wold, "Kaldor and Piketty's facts: The rise of monopoly power in the United States," Washington Center for Equitable Growth, February 2018. Jan De Loecker, Jan Eeckhout, "The Rise of Market Power and the Macroeconomic Implications," NBER, August 2017. Jan Hatzius, et al "Super Profits and Superstar Firms," Goldman Sachs, July 2017.

Eike, Kathy

From: Armstrong, David A. <DArmstrong@STU.EDU>
Sent: Tuesday, April 09, 2019 8:57 AM
To: RICH BankSup Applications Comments
Subject: [External] Comments on the SunTrust and BB&T Bank Merger

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SunTrust Bank has been a community partner to St. Thomas University for close to two decades. St. Thomas University is a not-for-profit faith-based institution of higher education located in Miami Gardens, Florida. The University is recognized for its programs in justice, international business, ministry and the sciences, and for preparing ethical leaders in their local communities and in the global arena. The University's full-time student population of 2,600 reflects the rich diversity of South Florida and the Region. St. Thomas is a federally designated Hispanic Serving Institution and 84% of its students identify as a minority. Last fall, 33% of the University's incoming class was classified as "first generation students" and 53% were designated as "low income."

To a small college like St. Thomas, it is critical to have a close relationship with its main banker. Over the years SunTrust has helped us with highly competitive terms on loans and credit lines. But more important, they have developed an intimate understanding of the university's goals and been involved on our boards and with our students.

SunTrust for the last twelve years has had an executive serving on our President's Board of Advisors; they have been supportive of events that raise monies for student scholarships; and they have attended many university activities. Additionally, SunTrust has partnered or advocated for us with several grant funded programs. This includes their foundation donating to two capital campaigns; helping us get monies from other foundations for our nursing program; and being the corporate partner in a national initiative for student career development - Strada. SunTrust also has taken on our business students as interns and provided financial advice to our students.

As a faith-based institution, we align ourselves with companies that promote ethics. SunTrust has a positive, longstanding reputation in the South Florida community. We are proud that they are our banker.

During this time of transition for SunTrust and BB&T, the executives we deal with from SunTrust have been supportive and have reassured us that we can expect the same level of engagement. We view the merger as a positive development for our institution and the community. For many years, we had a top executive from BB&T serve on our Business Advisory Board. They were supportive of our mission and as a company focused on ethics.

They are both strong companies and leaders in our community.

Sincerely,

David A. Armstrong, J.D. | President
St. Thomas University
16401 NW 37 Avenue
Miami Gardens, FL 33054
darmstrong@stu.edu



Please consider the environment before printing this email.

Eike, Kathy

From: Michael Blake Raymer <mraymer@gsu.edu>
Sent: Tuesday, April 09, 2019 8:23 AM
To: RICH BankSup Applications Comments
Subject: [External] Bank Merger

NONCONFIDENTIAL // EXTERNAL

PLEASE NOTE: This email is not from a Federal Reserve address.
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I'm writing this morning to offer my support of the proposed BB&T/SunTrust Bank merger currently being considered by various government agencies. SunTrust Bank and the SunTrust Foundation have been generous and key supporters of the Georgia Council on Economic Education for a number of years and have been instrumental in helping us help tens of thousands of Georgia teachers teach economics and personal finance in public schools across the state.

Current and past financial support from the SunTrust Foundation has helped us have a positive impact on hundreds of thousands of Georgia students in urban, suburban and rural communities in every corner of the state during the last 20+ years. Because of this generous support, the Georgia Council has been able to help these students become financially sound individuals and informed decision makers which will help them become more productive members of their communities.

We look forward to continued relations with the newly formed BB&T/SunTrust Bank entity as we are confident this newly-formed organization will continue to help underserved members of the communities where they do business in a number of important ways.

Sincerely,

Mike Raymer
Executive Director
Georgia Council on Economic Education
P.O. Box 1619
Atlanta, Georgia 30301-1619
Phone: (404) 413-7826
Fax: (404) 413-7827

April 9, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261



BOYS & GIRLS CLUBS
OF THE TENNESSEE VALLEY

967 Irwin Street
Knoxville, TN 37917

Tel. 865-232-1200
Fax 865-232-1201

www.bgctnv.org

To whom it may concern:

Boys & Girls Clubs of the Tennessee Valley is pleased to support the SunTrust and BB&T merger, as we believe that this combination will deepen the institutions' commitment to and investment in our community. SunTrust has been a funding and volunteer partner for Boys & Girls Clubs of the Tennessee Valley for nearly 20 years.

As part of this 20 year partnership, SunTrust staff have conducted financial literacy classes and sessions for youth and staff. SunTrust and the SunTrust Foundation have contributed more than \$100,000 directly to Boys & Girls Clubs of the Tennessee Valley. In addition, SunTrust has been a significant partner of Boys & Girls Clubs organizations throughout the Southeast, recently making a \$1,000,000 commitment to support workforce development programs in Clubs throughout the South.

SunTrust is a model partner through their voluntarism and corporate contributions and they are essential in our community to enable our youth to continue to utilize the life changing programs offered throughout Boys & Girls Clubs. We look forward to continued partnerships with SunTrust and BB&T stakeholders in the future.

Sincerely,

Bart McFadden
President and CEO



Please consider including
Boys & Girls Clubs in your will or estate plans

Bullock Properties, LLC

303 Washington Street, West, Charleston, WV 25302

304.342.0300 – Office

304.342.4300 – Fax

April 5, 2019

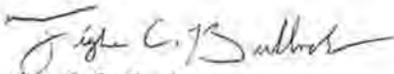
To whom it may concern,

I write this letter as a small business owner and real estate developer to express my full and unequivocal support of the merger between BB&T and SunTrust Bank. Over the years, BB&T, and in particular Marlo Long, has been a driving force in community redevelopment on Charleston's West Side. I have personally worked with Marlo Long and BB&T to successfully save a historic building on Charleston's West that was once empty, and now provides jobs for over 20 people.

With a merger between SunTrust and BB&T, more tools and support will be available to low income communities, communities impacted by the downturn in the energy sector, and those seeking to better their communities. Giving our communities the tools and resources to make positive change will strengthen our local economy and engender prosperity. I have no reservations that the proposed merger would help accomplish this end.

Communities across the country will benefit tremendously from the synchronicities the merger would create. For the foregoing reasons, I proffer this letter, without hesitation, in full support of the merger between BB&T and SunTrust Bank.

Best regards,



Tighe C. Bullock

President/Managing Member

Eike, Kathy

From: BankMergerApplication <BankMergerApplication@FDIC.gov>
Sent: Tuesday, April 09, 2019 8:06 AM
To: Eike, Kathy
Subject: FW: Support for BB&T merger with SunTrust

This message was sent securely using ZixCorp.

From: Donna Vincent [mailto:dvincent@glhfh.org]
Sent: Friday, April 05, 2019 11:48 AM
To: BankMergerApplication
Cc: scott.horchler@suntrust.com
Subject: Support for BB&T merger with SunTrust

Ladies and Gentlemen,

I'm writing to support the proposed merger between SunTrust and Branch Banking & Trust. Both banks support affordable housing efforts for low income families in their service regions, and this affiliate of Habitat for Humanity has benefited from their investment of grant funds for the construction of homes. We hope that by combining, their Foundation and Community Reinvestment funds will be maximized, thus allowing even more engagement with agencies, developers, and nonprofits that seek to provide affordable housing and other community-enhancing programs.

This past week, GLHFH dedicated its 303rd home, which was built with sponsorship funding from SunTrust. The home would not have been possible without them. There are many more examples from this affiliate and others. Here is our 303rd home built in partnership with SunTrust and the Anderson family:



Thank you for your consideration.

Donna Vincent
Executive Director
Greater Lynchburg Habitat for Humanity
(434) 528-3774



We build
**strength, stability,
self-reliance
and shelter**

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www.parkcenternashville.org

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Agency Phone 615.242.3576

Park Center South
Psychiatric Rehabilitation Program
801 12th Avenue South
Nashville, TN 37203
F: 615.242.3580

Park Center East
Co-Occurring Disorder Services
948 Woodland Street
Nashville, TN 37206
F: 615.650.8917
Residential Services
F: 615.226.5783
Homeless Outreach
F: 615.227.6392

Park Center North
Emerging Adults Services
4501 Gallatin Pike
Nashville, TN 37216
Residential F: 615.228.4344
Day Program F: 615.650.0002

April 4, 2019

FDIC
Atlanta Regional Office
10 10th Street , NW
Suite 800
Atlanta, GA 30309-3849

To Whom It May Concern:

I'm writing in support of the merger of SunTrust Bank and BB&T.

SunTrust has been a banking partner of Park Center for many years and has always been supportive of our mission to empower people who have mental illness and substance use disorders to live and work in their community. SunTrust has provided funding for our programs and our special events. They are a valuable member of the Nashville community, a position that should only be strengthened with the merger with BB&T.

If you need additional information about our partnership with SunTrust, please contact me at 615-242-3831 or Barbara.quinn@parkcenternashville.org.

Sincerely,

Barbara Quinn
President & CEO



April 4, 2019

FDIC Atlanta Regional Office
10 10th Street NW, Suite 800
Atlanta, GA 30309-3849
BankMergerApplication@fdic.gov

RE: SunTrust and BB&T Merger

The MMBC Continuum (“formerly the Mid-South Minority Business Council”) and the MMC-TADP, Inc. (“TADP”) are proud partners of SunTrust Bank, Memphis. We are pleased to extend our support of the SunTrust and BB&T merger.

The MMBC Continuum, a 501(c)(6) organization, is a non-traditional minority economic development agency with a long standing history and nearly 40 years of experience providing strategic growth solutions to minority businesses. The MMBC Continuum serves over 650 Minority and Women-owned Business Enterprises (M/WBEs) located in the Memphis Metropolitan Statistical Area which includes eight counties in West Tennessee, Eastern Arkansas and Northern Mississippi. The organization’s mission is two-fold; to provide unparalleled core business development resources that empower minority and women-owned businesses to successfully compete in the global economy, as well as valued resource to corporate partners in support of their procurement, supplier diversity strategies and other customized corporate services. In a collaborative effort with its sister organization, the MMC-TADP, Inc. (TADP), a 501(c)(3) training and development program, The MMBC Continuum offers a variety of business training, development, and technical assistance services focused on the strategic and disciplined growth of minority businesses. The TADP and The MMBC Continuum work together to bring world-class programs and services to M/WBEs in the mid-south to promote minority economic development.

The MMBC Continuum/MMC-TADP has a long standing collaborative relationship with SunTrust Bank, Memphis. That relationship allows members of the SunTrust Bank, Memphis team to integrate into the programs, events, and training/development activities designed for our minority and women business owner membership. Over the years SunTrust Bank, Memphis, has deployed team members ranging from the Bank President to participate on panel discussions, to commercial bankers presenting succession planning/investment seminars and year-round hands-on participation with M/WBEs as part of MMBC’s Scalable Minority Business Banking Initiative. This immersion has fostered trust and value-filled relationships between the SunTrust bankers and the M/WBE members of our organization supporting our efforts to develop more bankable minority and women-owned businesses.

We value the partnership and support of SunTrust Bank, Memphis and hope they have the opportunity to continue to serve the businesses and citizens of Memphis and Shelby County, Tennessee.

Sincerely,

Jozelle Luster Booker
President and CEO

The Mid-South Minority Business Council Continuum



April 2, 2019

FDIC Atlanta Office
10 10th Street NW Suite 800
Atlanta, GA
30309-3849

Dear Friends:

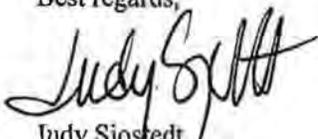
I am writing this letter in support of the BB&T – SunTrust merger. BB&T has been active in community and economic development throughout the State of WV for many years, and has delivered critical leadership in these efforts through their Senior Vice President/Community Development Specialist, Marlo Long, who has been with the bank over 16 years.

I have known of Ms. Long and her work on behalf of community development in conjunction with BB&T for the entire period of her association with the bank, as I have led this organization since 1999. For the entire time that I have known her, she has steadfastly served as a community leader on many nonprofit boards, committees and steering teams. BB&T has been highly responsive to community needs through her service. If there is a major community betterment project in our region, Marlo is there. She is incredibly knowledgeable in terms of matters pertaining to economic and community development in West Virginia and our region. She co-authored a white paper with me a decade ago as a project for *A Vision Shared*, a public-private partnership organization, in which we highlighted the important role of West Virginia's nonprofit sector and which later provided a critical impetus for the formation of the West Virginia Nonprofit Association.

I personally served with her for three full terms (nine years) on the West Virginia Neighborhood Investment Tax Credit Program Advisory Board. In this vital role, we were responsible for serving as the advisory body reviewing the assignments of tax credit associated with a program to aid low income individuals and distressed communities. Her community development and CRA activities have brought us into close association on many occasions as she provided meaningful grants for our organization and for some of its component fund projects. Even as recently as last month, I came into contact with her at a meeting of the statewide organization, the West Virginia Community Development Hub, an organization which promotes community and economic development across our state at a grassroots community level, and helps our citizens to build a better future for their hometowns. Marlo has been a part of this organization for many years and instrumental in providing leadership to guide its direction.

In summary, I am very pleased to provide personal support for the BB&T-SunTrust merger and would be glad to provide any further information that might be helpful.

Best regards,



Judy Sjostedt
Executive Director

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GIVE FOR GOOD, FOR EVER!

Parkersburg Area Community Foundation & Regional Affiliates of
Doddridge County, Ritchie County and the Little Kanawha Area (PACF)