

**From:** John Lydon <johnly@auberle.org>  
**Sent:** Thursday, February 04, 2021 7:37 PM  
**To:** CLEV Comments Applications <comments.applications@clev.frb.org>  
**Subject:** [External] Huntington Bank TCF National Merger

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I wanted to provide some input as to Huntington Bank and its proposed merger with TCF National Bank. I understand that this proposal is in front of you and there is an opportunity to comment especially as to the track record of Huntington Bank and its work in the community.

Auberle is a regional non-profit social service agency based near Pittsburgh PA that serves 4,000 people a year, living in a dozen counties in PA, through more than two dozen programs. Our faith based Mission is to build strong individuals, families and communities. Our programs include housing, mental health, substance abuse, foster care, independent living services for young adults aging out of foster care, workforce development and many other areas. Our budget for three non-profit entities is \$16 million. We have been named Agency of the Year by the national Alliance for Strong Families and Communities. We received the national Aramark Building Organizational

Leadership Award for “great leadership, strategic governance, a focus on equity, a culture of partnership and innovation, and a commitment to values-based advocacy.” (Aramark national press release Feb 2018). These are just two of many national, state and regional awards for our quality service.

Huntington Bank has been Auberle’s partner for decades and has played a significant role in Auberle’s success, and not just for excellent and attentive banking services. Their employees volunteer throughout our agency in so many different ways. They teach financial literacy to our clients in multiple programs. They organized and maintain our clothing donation rooms where families at our homeless shelter, or young adults heading for their job interview, or foster parents clothing children can select appropriate clean and attractive clothing. They conduct mock interviews to prepare job applicants. They work with our new staff at orientation, many coming from a low income background, to be sure that they have a bank account, and understand banking and credit options so that their families truly benefit from employment with us. They volunteer at all of our major events and help to spread awareness of our services and the agency throughout the region.

Huntington has been a long time key leader/donor to our Employment Institute which trains and places 700 people a year in career jobs with 15 nationally recognized certifications in short supply in our area. Before most companies knew of our work, Huntington was supporting it and helping it to grow to where we now have 130 company partners hiring our clients. The Bank sponsors our annual awareness event and their volunteers help to staff it and collect/count the money raised. They partnered with us this year to change the format to be a very successful virtual event.

Huntington Bank demonstrates its commitment to the community and its clients through its banking services as well. A few years ago, the Commonwealth of PA had a state budget impasse that lasted 7 months, from July 1 until the following January. The state could not disburse payments to the counties and the counties could not reimburse social service agencies for their work. Most nonprofits had to shut down early on. As a result their employees and their clients suffered greatly as a result of the political stalemate. We used our lines of credit with Huntington to continue operate. That meant as the stalemate went on that our receivables from government agencies piled up at a rate of almost \$1M a month. But the Bank was very proactive in addressing the issue several times with us and with their guidance and flexibility, every Auberle program continued to operate throughout, and every Auberle staff member remained employed and was paid.

This scenario recently repeated itself with the Covid pandemic. Huntington staff helped us navigate through the uncertainty of the Paycheck Protection Program loan process when it first came out. We successfully borrowed \$1.7M. As a result, all Auberle programs have continued to operate, we did not lay off any staff, and the people in the community benefited. In fact, we were able to repurpose staff and launch 9 new programs since Covid began to help deal with the economic fallout of the pandemic, including operating the quarantine/isolation facility for families in the region.

Huntington's commitment to the community was recently and dramatically demonstrated by its \$20B, 5 year commitment to promote economic inclusion. The segment of this to help with first time home ownership and affordable housing truly resonates with those we serve in our nine housing assistance programs. While the Huntington funding does not come to or pass through Auberle, we truly appreciate how it will make an appreciable difference for the people we serve. And for nonprofit staff who often cannot afford to be home owners especially when they live in low and moderate income communities.

Besides serving as the CEO of Auberle, I am very active in regional human serve and non-profit groups. I served for many years on the Board of the Greater Pittsburgh Regional Non-Profit Partnership (GPNP), a group of 450 regional nonprofits. I served two years as Vice-Chair and two years as Chair of GPNP. In that role I saw Huntington Bank take a real leadership role in the non-profit community through support and guidance of many non-profits, and also as the acknowledged banking leader in supporting our education activities to strengthen non-profits and to improve the quality of their services throughout western PA. Their regional CEO Susie Shipley and her senior execs are quite visible throughout the region as leaders in improving our quality of life.

I applaud Huntington Bank's commitment to our region, its communities and its people, especially those on the margin who are often unnoticed in banking. I am happy to answer any questions you may have and strongly support this merger as its impact can only strengthen the great work of Huntington Bank in our region. John

**John Patrick Lydon**

Chief Executive Officer

Auberle

*Where Lives Change*

1101 Hartman Street

McKeesport PA 15132-1500

412-673-5856 x1310

[www.auberle.org](http://www.auberle.org)

***Aramark National Building Community Organization Award***

***Alliance for Strong Families and Communities National Agency of the Year***

**From:** Carol Potter <carol@youngstown.bbb.org>  
**Sent:** Friday, February 05, 2021 11:05 AM  
**To:** CLEV Comments Applications <comments.applications@clev.frb.org>  
**Subject:** [External] Huntington Bank

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Good morning,

I would like to share my experience and outstanding interactions with Huntington Bank and Regional President Bill Shivers and his team. With the support of over 1,000 local businesses and nonprofits, the BBB of the Mahoning Valley serves the 530,000 residents of Columbiana, Mahoning and Trumbull Counties. The BBB Board is integral to our mission to build trust in the marketplace, and Bill is a longstanding and most-valued director.

Huntington has partnered with BBB since the inception of the BBB's Torch Awards for Marketplace Trust. This sponsorship has allowed for the recognition of businesses, community leaders and nonprofits who operate with the highest levels of trust and integrity. BBB is grateful for Huntington's long history of support.

As a community leader, I serve on numerous boards and committees, and Huntington's corporate philosophy of giving back to the Valley has been extremely impactful. Through sponsorships and volunteerism, Huntington has worked to improve the quality of life here, with a special focus on underserved and vulnerable populations.

I consider it a great privilege to have the opportunity to work with Bill and the Huntington team and look forward to even greater possibilities for community advancement when Huntington Bank joins with TCF Bank, another trusted partner with BBB.

Sincerely,  
Carol Potter

**Carol Potter**  
*President & CEO*  
**BBB Youngstown**  
330.744.7210  
[BBB.org](http://BBB.org)

-----Original Message-----

From: Vickie Wright <vwright@bestlifecounselingservice.com>

Sent: Wednesday, February 10, 2021 11:22 PM

To: CLEV Comments Applications <comments.applications@clev.frb.org>

Subject: [External] Proposed Merger between Huntington and TCF Bank

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To Whom It May Concern,

I am requesting that you extend the deadline for public comments, and that the merger be denied.



 **75**  
HOMES  
BUILT & REHABILITED

 **150**  
HOMES  
REPAIRED

 **1,000**  
LIVES  
CHANGED

 **10,000**  
VOLUNTEERS  
MOBILIZED

JOIN THE MOVEMENT

[hfhs Summit County.org/imagineimpact](http://hfhs Summit County.org/imagineimpact)

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**Brian Bender**

Charles Schwab

**Michelle Carano**

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**Michele Cicciari**

Wells Fargo Advisors

**Michael Clark**

Oswald Companies

**Nancy Diller-Shively**

Community Member

**John Gruneich**

Retired Pastor

**Joe Majewski**

ChromaScape, Inc.

**Annie McFadden**

City of Akron

**John Nauer**

FirstEnergy

**Lynda Nowak**

Huntington Bank

**Dave Oeschger**

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**Rev. Ron Shultz**

Family of Faith UMC

**Anthony Vacanti**

Tucker Ellis LLP

**Amanda VanHorn**

Cleveland Clinic Akron General

**Mary Verstraete**

Retired, The University of Akron

**Monica Vinay, Past President**

Myers Industries, Inc.

**Tim Ziga**

Akron Children's Hospital

**Rochelle D. Sibbio**

President & CEO

**Rev. Mark Frey, Emeritus**

Retired, Bath Church UCC

**Dave Woodburn, Emeritus**

Roetzel & Andress

February 5, 2021

Mary S. Johnson

Vice President

Federal Reserve Bank of Cleveland

1455 East Sixth Street

Cleveland, OH 44101-2566

Sent via email to: [comments.applications@clev.frb.org](mailto:comments.applications@clev.frb.org)

Dear Ms. Johnson and members of the Federal Reserve Bank of Cleveland,

Habitat for Humanity of Summit County is pleased to send this letter of support and comment on behalf of Huntington National Bank on the merger with TCF Bank. Huntington has been a long time partner, FirstMerit prior to that merger, of our organization. Not only do they hold our operating account and escrow account for our organization and families whose mortgages we serve, but they also hold our merchant services account for our retail store as well as our line of credit.

As a long time partner Huntington also held a mortgage on our facility at 2301 Romig Road, which was paid off in January 2020 and worked with us on loans for construction vehicles. Our business banker, Jen Oberg has been great to work with as well as Amy Patton in Communications as well as Nick Browning, President of Huntington for Akron. Huntington has a representative on our board of trustees as well with Lynda Nowak and they regularly provide volunteers to our build sites.

Again, it is a great pleasure to provide a letter of support for all that Huntington does in our community not just for Habitat but also for many other non profits in our community. If I can be of any further service, please feel free to reach out to me at 330-745-7734 x 203.

Sincerely,

Rochelle D. Sibbio

President & CEO

Follow Us @HFHSummitCounty



2301 Romig Road Akron, OH 44320  
p.330.745.7734 f.330.745.9249  
[www.hfhs Summit County.org](http://www.hfhs Summit County.org)



February 4, 2021

Mary S. Johnson  
Vice President  
Federal Reserve Bank of Cleveland  
1455 East Sixth Street  
Cleveland, OH 44101-2566

Dear Ms. Johnson:

Please accept this letter from the Indianapolis Neighborhood Housing Partnership, Inc. (INHP) that outlines our comprehensive partnership with Huntington Bank. We understand Huntington Bank is planning to merge with TCF Bank and the following information illustrates they are a strong partner with INHP and in the Indianapolis community.

INHP is an AERIS rated Community Development Financial Institution (CDFI) in Indianapolis, Indiana, which has been serving the community for nearly 33 years. We have in-depth partnerships with numerous lending institutions as we aggregate capital to help families with low- and moderate-incomes access (a) 1st and 2<sup>nd</sup> mortgage lending products, (b) unbiased homeownership advising services, (c) post purchase counseling to prevent foreclosures, (d) an array of INHP and private sector affordable mortgages programs, and (e) timely financial education to promote long term homeownership.

Huntington Bank engages in diversified and integrated partnerships with INHP and our local community through its varied community development and affordable housing engagements and loan programs which are specifically designed to support people with low- and moderate-incomes.

INHP benefits from Huntington Bank's expertise and community engagement pillars in various ways such as board engagement. The Indiana Market President, John Corbin, is the Vice Chair of the INHP Board of Directors. His expertise in finance, retail banking, commercial lending and mortgage loans make him the ideal candidate to provide counsel as our organization evaluates new business lines, designs innovative mortgage products, evaluates lending practices, etc.

Additionally, Huntington Bank has been a steadfast annual donor to INHP to support our financial literacy programming and affordable lending products. They regularly support our fundraising events that bring additional awareness to affordable housing and community development trends, data collection, policies, and success stories. Huntington Bank employees regularly volunteer to serve as subject matter experts during our financial literacy classes working directly with consumers.

Huntington Bank has invested millions in lending capital to our organization over the years through multi-bank loan pool facilities to provide funding for INHP to originate 1<sup>st</sup> mortgages. Huntington Bank has also purchased multiple loan portfolios from INHP.

Huntington Bank has used its position and access in the local community to provide technical resources and counsel as INHP develops new lending products. Additionally, they consistently engage INHP to discuss how they can support the capital needs of our programs as well as increasing the awareness of INHP's full range of services.

Huntington Bank is a leader and an asset to the Indianapolis community and, specifically, to INHP. If you have any questions related to our partnership with Huntington Bank or our programs and services, please contact me at [mcarls@inhp.org](mailto:mcarls@inhp.org) or 317-610-4618.

Sincerely,

A handwritten signature in cursive script, reading "Moira Carlstedt".

Moira Carlstedt  
President and CEO  
INHP

**From:** Ron Bartell

**Sent:** Wednesday, February 10, 2021 9:36 PM

**To:** CLEV Comments Applications <comments.applications@clev.frb.org>

**Subject:** [External] Proposed Merger of Huntington Bank and TCF

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To Whom it May Concern,

Please be advised that the COMMUNITYROUNDTABLETEAM-Detroit is totally opposed against the Proposed Merger between Huntington Bank and TCF Bank. If this merger is allowed to proceed competition among banks in the Detroit Market will be almost non existence. Banking access for Detroiters will decrease and cost will increase tremendously. Therefore, we are requesting that the period for Public Comments be extended so the Public can really have their input on the implications of this merger, until this is done the merger should be denied!!!

Warm Regards,

Ron Bartell

CommunityRoundTableTeam-Detroit

Sent from [Mail](#) for Windows 10



NATIONAL  
MINORITY  
COMMUNITY  
REINVESTMENT  
CO-OPERATIVE

701 S. Howard Ave #106-147 Tampa FL 33606

**PUBLIC COMMENT LETTER ON PROPOSED HUNTINGTON BANK-TCF BANK MERGER:**

February 9, 2021

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

Office of the Comptroller of the Currency (OCC)  
Mr. Black Paulson  
Acting Comptroller  
400 7<sup>th</sup> St SW  
Washington DC 20219

RE: Opposition to Huntington Bank-TCF Bank Merger/Thuggery Style Tactics By Huntington Bank CEO and Senior Leadership To Silence Black and Leaders/Request for A Public Hearing on Merger/Request to Extend Public Comment Period of Merger/Request Delay of Huntington Bank-TCF Bank Merger Until New Comptroller of Currency In Position To Participate in Decision (submitted via email/online comment portal)

Honorable Governor Lael Brainard, Comptroller Paulson:

Approval of any financial institution should not only be made on the economic impact on the communities they serve, but a bank should also be graded during a merger application on diversity of senior management, supplier diversity and can a bank be trusted by the communities they serve to include Black & Latino communities. Without doubt, the Black & Latino communities have little trust of Huntington Bank and oppose this merger. I have attached a recent Detroit Free Press article that details the concerns of key Detroit Black leaders on this proposed merger.

This pandemic has clearly showed a significant socio-economic fault line in the U.S. economy between Whites & Blacks/Latinos. From the George Floyd marches to the Black Lives Matter marches the message is loud and clear, we can not and will not any longer accept the “**status quo**” be it social or economic. The Black & Latino communities have reached a breaking point to racial economic exclusion that begins with the U.S. banking system where most banks have marginalized, manipulated and minimized the “spirit” of the Community Reinvestment Act of 1975 that has resulted in a staggering racial wealth gap that not only harms our Black & Latino communities, but the ability for our countries economic future in this global economy. Huntington Bank exemplifies this very negative banking behavior. Which is why the leaders across the country who make up the NMCRC are requesting that this proposed Huntington Bank-TCF merger so the following can occur: extend the public comment period, schedule a virtual public hearing so the voices of Black & Latino communities can be heard across the footprint of Huntington Bank and lastly delay the decision for this proposed merger (making them the 10<sup>th</sup> largest U.S. Bank) until the new Comptroller of the Currency is nominated-confirmed and in place so he/she can participate in this decision along with the Federal Reserve Board.

The first point we wish to expand on is the outright “white thuggery towards Blacks & Latinos” by the senior CRA management of Huntington Bank that we feel is fully endorsed by the CEO’s of both Huntington Bank and TCF Bank. First, the CRA leadership of Huntington Bank contact a national CRA organization, led by 2 white men who have no idea on what it is like to be Black & Latino, and directs this white led organization to

lead and organize a Detroit community committee so they can speak for the entire Black & Latino community in regard to this merger.

But far more disturbing, these 2 white men would speak for Blacks & Latinos with senior management of Huntington Bank. This small committee was made up of predominately white led organizations (with predominately white Board of Directors). Detroit has over 300 Black Led & Focused organizations so how can these white leaders speak for the Black community of Detroit? They can not. The Huntington Bank “thuggery” continued with attacks against me personally with this white organization even placing my name (Al Pina) on their Huntington Bank committee meeting. Clearly, they have had private discussions with Huntington Bank CRA officials in attempts to minimize my ability to aid and assist the Black communities of Detroit. This point was made even clearer when Staci Glen/Sandy Pierce had a Black Huntington Bank CRA employee (who reports to them) contact a leader of the Detroit Black & Latino Community CRA Leadership Council (DBLCCLC) twice and requested that I not be allowed to attend a CRA meeting between Huntington Bank and DBLCCLC. This leader of DBLCCLC made it clear to them I was their national CRA advisor and will be attending bank meetings with them. But just when I thought this “Huntington Bank Thuggery” could not get worse, it does. In this Huntington Bank-DBLCCLC CRA meeting, Black & Latino leaders made it clear to Huntington Bank that their CRA programs were not effective and that the Huntington Bank lending data provided in this meeting was misleading because they mixed predominate Detroit Black zip codes with mixed/white zip codes. Leaders of DBLCCLC requested lending data on predominate Black zip codes for Detroit and Sandy Pierce of Huntington Bank agreed. Ms. Pierce also agreed to work with DBLCCLC on CRA issues and programs (we recorded this meeting and is available on request). But 2 days later Ms. Pierce after receiving a letter from Ms. Dina Harris who outlined the discussion points agreed on at his meeting, Ms. Pierce responds with a letter back to Ms. Harris that uses a veiled threat against Ms. Harris on future funding and goes back on her commitment to work with DBLCCLC on Black community issues with Huntington Bank CRA programs & lending. Ms. Harris felt so offended that she responded back to Ms. Pierce on this matter. I have attached a copy of this letter for the record. But even more troubling is that a Huntington Bank CRA official shared this letter by Ms. Harris with other white led organizations in attempt to create conflict.

As noted, I am a national advisor to the Detroit Black & Latino Community CRA Leadership council. Both Detroit & Baltimore have launched Black & Latino CRA Leadership Councils that will serve as models for Blacks & Latinos to follow in other cities to ensure there is LOCAL CRA impact for Black & Latino communities. I have attached a press release by the Detroit Black & Latino Community CRA Leadership Council that expresses considerable concern regarding Huntington Bank that alone should justify a public hearing on this merger as well extending the public comment period. I have spoken to over 50 Black & Latino community leaders in the Huntington Bank service areas and not only did they all express concerns regarding Huntington Bank CRA impact on their communities, but not one of them knew that they could provide a public comment directly to your agencies regarding this merger. Many have started to provide comments to the OCC portal on the Huntington Bank-TCF merger. But an extended comment period will allow NMCRC to hire a person to outreach to Black & Latino communities throughout the Huntington Bank footprint so they can provide community public comments on this proposed merger. I am 100% sure that a vast majority of comments **will demonstrate to your agencies that Huntington Bank CRA programs and services have had marginal impact in Black & Latino communities that will directly contradict the “outstanding” CRA grade given by your agencies to Huntington Bank.**

There is a complete lack of diversity in Huntington Bank in both their senior management and supplier providers. This lack of Black & Latinos in senior management and as suppliers clearly reflects the marginal number of home/small business loans to Blacks & Latinos. HMDA data for predominate Black & Latino zip codes shows Huntington Bank has not interest in lending to our communities. As you well know, section 1071 of the Dodd-Frank Act is going into effect where banks must report all small business lending by race and zip code. We wish to submit for the record, we are 100% positive that the small business lending to Blacks & Latinos will account for less than 5% of their overall business loans for their entire footprint.

Huntington Bank Executive Management Team (All White/No Blacks or Latinos):

## Executive Management Team

 <p><b>Stephen D. Steinour</b> Chairman, President and Chief Executive Officer</p>	 <p><b>Andy Harmening</b> Senior Executive Vice President, Consumer and Business Banking Director</p>		
 <p><b>Paul Heller</b> Senior Executive Vice President, Chief Technology &amp; Operations Officer <a href="#">View Full Bio</a></p>	 <p><b>Helga Houston</b> Senior Executive Vice President, Chief Risk Officer <a href="#">View Full Bio</a></p>	 <p><b>Rajeev "Raj" Syal</b> Senior Executive Vice President, Chief Human Resources Officer <a href="#">View Full Bio</a></p>	
 <p><b>Scott Kleinman</b> Senior Executive Vice President and Director of Commercial Banking <a href="#">View Full Bio</a></p>	 <p><b>Jana Litsey</b> Senior Executive Vice President and General Counsel <a href="#">View Full Bio</a></p>	 <p><b>Mark Thompson</b> Senior Executive Vice President, Director of Corporate Operations <a href="#">View Full Bio</a></p>	 <p><b>Julie C. Tutkovics</b> Executive Vice President, Chief Marketing and Communications Officer <a href="#">View Full Bio</a></p>
 <p><b>Sandra Pierce</b> Senior Executive Vice President, Private Client Group &amp; Regional Banking Director and Chair of Michigan</p>	 <p><b>Richard "Rich" Pohle</b> Executive Vice President, Chief Credit Officer <a href="#">View Full Bio</a></p>	 <p><b>Michael Van Treese</b> Executive Vice President, Chief Auditor</p>	 <p><b>Zachary "Zach" Wasserman</b> Senior Executive Vice President, Chief Financial Officer</p>

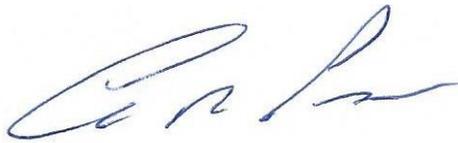
The proposed merger between Huntington Bank & TCF Bank will make Huntington Bank the 10<sup>th</sup> largest financial institution in the United States. Without doubt, a top 10 bank makes Huntington Bank (lead bank in proposed merge) will make them a too large to fail bank. And with Racial Equality/Economic Inclusion/Racial Wealth Gap being a top priority of the Biden Administration, a top 10 bank is a critical access to capital mechanism for Black & Latino communities to make any impact on addressing the rising racial wealth gap. And with questionable true access to capital for Blacks & Latinos throughout the footprint of Huntington Bank, **this proposed merger should be delayed until the new Comptroller of the Currency is nominated and approved by the Senate Banking Committee so this new Comptroller can have input into this proposed merger.**

In closing, again we highly recommend the following for this proposed merger:

- 1) Extend the public comment period so Black & Latino community leaders (throughout the Huntington Bank service footprint) can be informed & educated on the CRA and the Huntington Bank-TCF merger so they can understand how to make a public comment for this proposed merger.
- 2) With major economic issues in Black & Latino communities, and that banks must play a vital role in addressing these economic issues with access to capital, conduct no less than 2 virtual public hearings on this proposed bank merger to ensure Black & Latino community/business leaders can be heard directly by the regulators to better allow you to navigate this merger.
- 3) With an impending nomination of a Comptroller of the Currency, and this merger thrusting Huntington Bank as the 10<sup>th</sup> largest bank in the United States, delay the final ruling on this proposed merger until the new Comptroller is in place so the can have input into this merger.

We at NMCRC thank you for your consideration on this Black & Latino community request. If there are any questions, please feel free to contact myself directly at (813) 598-6361.

Cordially,



**"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

Co-Founder, National Minority Community Reinvestment Co-Operative(NMCRC)

National Virtual Black & Latino Economic Summit ([www.blackandlatino.org](http://www.blackandlatino.org)) Dec 9-10

Cell 813-598-6361 twitter: [Al Pina @AlPinaFMCRC](https://twitter.com/AlPinaFMCRC)

[www.assetsandhope.org](http://www.assetsandhope.org) [www.fmcrc.org](http://www.fmcrc.org)

## **FAITH-HONOR-STRENGTH**

Attachments:

Detroit Fee Press Article on Black Community Issues on Huntington Bank-TCF Merger

Letter to Huntington Bank CRA leader from Detroit Black & Latino Community CRA Leadership Council Leader

Detroit Black & Latino Community CRA Leadership Council Press Release on Huntington Bank Merger

Detroit Black & Latino Community CRA Leadership Council Overview

**NMCRC (National Minority Community Reinvestment Co-Operative) is an informal national organization made up of Black & Latino led & focused organizations and leaders committed to a co-operative approach to address the socio-economic needs of minority communities through the creation of sustainable community economic development opportunities. The co-operative relies on a dynamic set of Black & Latino networks, relationships, common socio-economic interests and experiences to assist one another for the better good of the overall socio-economic health of all minority communities**

**BUSINESS**

# **Black and Latino group in Detroit opposes Huntington-TCF merger plan.**

## **Here's why**

**JC Reindl**

Detroit Free Press

There is new opposition to the planned merger of Detroit-based TCF Financial Corp. into Huntington Bancshares of Columbus, Ohio, with critics saying the deal, as proposed, would

bring few benefits to Detroit's Black and Latino communities as well as other bank customers across the state.

The opposition is from the Detroit Black and Latino Community CRA Leadership Council, a group of local nonprofits, church leaders and others. The "CRA" in its name refers to the federal Community Reinvestment Act, which encourages banks to help meet credit needs in cities where they do business, especially for lower-income individuals.

"I don't know why we would support it, unless they are making specific and serious overtures to the community," said the Rev. Charles Williams, a Leadership Council organizer, pastor of the Historic King Solomon Baptist



Church in Detroit and chairman of the Michigan chapter of Al Sharpton's National Action Network. "It's not enough to say, 'Well, we're going to write checks to banquets and we're going to make some donations.' "

The Leadership Council and its members have been submitting public comments about the TCF-Huntington merger to the federal Office of the Comptroller of the Currency. The comment period runs through Feb. 10, and the merger needs approvals from the Federal Reserve Board and the antitrust division of the U.S. Department of Justice.

**More:TCF-Huntington merger could be good for shareholders. Consumers too?**

**More:Huntington, TCF to close 198 branches for planned merger**

Huntington has said it anticipates getting the approvals and finalizing the deal sometime in the second quarter.

If and when the merger happens, the TCF name would be retired and the newly enlarged Huntington would have a \$22 billion market value and be the second biggest bank in Michigan, based on the size of existing Huntington and TCF deposits.

The merger also would unlock "significant cost synergies," including from the closure of 198 current Huntington and TCF bank branches. That number includes all 97 in-store Meijer bank locations in Michigan. The two banks have a combined 532 branches in Michigan, according to data from the Federal Deposit Insurance Corp.

"It is high time that banks stop gobbling up our community banks, becoming big conglomerates and then closing 200 branches making it impossible for low- to moderate-income individuals and those vulnerable to access their products and services," Dina Harris, another Leadership Council organizer and founder of the Detroit-based nonprofit National Faith Homebuyers, wrote in a letter submitted for public comment.

## **Shedding accounts**

Huntington also anticipates shedding about \$375 million in existing TCF customer deposits in four Michigan banking markets — Cadillac, Gaylord, Gladwin-Midland and Roscommon — and handing over those customer accounts to other banks. That move, known as a deposit divestiture, would be done to ease federal regulators' antitrust concerns about the merger.

Lysa Davis, another organizer, said the council is concerned about the merger's potential negative impact on lending availability to small minority-owned businesses as well as minority homeowners.

If the merger does proceed, the council wants Huntington to do a five-year, \$750 million spending commitment (\$150 million per year) that is easy for people to access and specifically for Detroit Black and Latino businesses, real estate developers, homeowners and community organizations.

Huntington already has promised to set up a \$50 million donor-advised fund at the Community Foundation for Southeast Michigan if the merger goes through. Those funds would be allocated at the direction of Gary Torgow, the current TCF board chair and future board chair of the post-merger Huntington, and David Provost, current CEO of TCF.

Lysa Davis, another organizer, said the council is concerned about the merger's potential negative impact on lending availability to small minority-owned businesses as well as minority homeowners.



Lysa Davis is an organizer of the Detroit Black & Latino Community CRA Leadership Council and executive director of the nonprofit Community-Up. *Robin Gamble*

But Leadership Council members say that \$50 million fund isn't sufficient. They are concerned that small minority-led organizations in Detroit often encounter difficulty getting access to Community Foundation assistance because of strict approval guidelines and burdensome reporting requirements, Davis said.

"The criteria to get a grant from Community Foundation for Southeast Michigan is so tough and stringent and aggressive — it's hard," Davis said. "There is so much need, and so many Black businesses can't get funded. They're putting money out here, but they are putting it in organizations that don't fund Black and Latino businesses."

A Community Foundation representative declined Wednesday to address those claims about its grant process.

Foundation President Mariam Noland said in a statement that “TCF and Huntington have been wonderful contributors to the community and the Community Foundation.”

A TCF representative referred all comment for this article to Huntington. A Huntington representative Wednesday wouldn't provide an interview to the Free Press.

## **'Outstanding' rating**

Huntington received an "outstanding" performance rating in its last publicly released Community Reinvestment Act assessment, which was issued in 2016 for the years 2012-15.

But Leadership Council members claimed banks can game CRA assessments and that the assessments don't always accurately reflect community contributions.

Members said they had a virtual meeting last week with several Huntington bank executives. The meeting did not go well, according to council members, as Huntington took a "smoke and mirrors" approach with data that mixed whiter, higher-income cities around Detroit together with Detroit, a majority-Black city.

"So it really wasn't truly reflective of lending in predominately Black ZIP codes," said Al Pina, an adviser to the Leadership Council and co-founder of the National Minority Community Reinvestment Cooperative. "They came back and said, 'We'll provide that.' But now they're saying they're not going to provide (the Detroit data)."

Pina said he hopes that federal regulators take a close look at the merger plan and whether it would truly benefit Detroiters.

He wants the Federal Reserve Board to hold a formal public hearing for the merger, similar to what occurred for the controversial BB&T and SunTrust Banks merger in 2019. That merger ultimately went through, although only after the banks made deeper concessions than initially planned.

"I can't see how this is good for Detroit, and particularly, I don't see how this is good for the Black community," Pina said. "If the merger is approved, I think it will be approved with stipulations."

## Past pledges honored

Huntington and TCF have made other community pledges beyond the planned \$50 -million donor-advised fund. Those pledges would still be honored after the merger and include TCF's five-year, \$1 billion loan commitment made last year to minority- and female-owned small businesses, and \$10 million for grants to help low- to moderate-income homebuyers.

Huntington also made a \$5 billion commitment for Michigan as part of its 2020 Community Plan, focused on "driving economic inclusion through access to capital, affordable housing and home ownership, and community lending and investment."

Huntington says it plans to have two headquarters after the merger: one in Columbus and the other a commercial banking headquarters in Detroit inside a new 20-story downtown tower that is under construction.

Contact JC Reindl: 313-222-6631 or [jcreindl@freepress.com](mailto:jcreindl@freepress.com). Follow him on

Twitter [@jcreindl](https://twitter.com/jcreindl). Read more on business and sign up for our business newsletter.



January 29, 2021

**LEADERSHIP COUNCIL ORGANIZERS**

**ABAYOMI CDC**

Tawnya Morris - President CEO/Council Woman

**COMMUNITY-UP**

Lysa Davis - CEO/Executive Director

**FAMILY TREE**

Pastor Pat Pearson - Executive Director

**KING SOLOMON BAPTIST CHURCH  
NATIONAL ACTION NETWORK (MI)**

Pastor Charles Williams - President/Pastor

**NATIONAL FAITH HOME BUYERS**

Dina Harris - Executive Director

**REDEEM DETROIT**

Pastor Alonzo Bell - Executive Director

**CONSULTANT**

Chris Aldridge

**ADVISORY COUNCIL**

*AL PINA*

CHAIR, FMCRC - Assets & Hope

National Minority Community

Reinvestment Co-operative (co-founder)

*MARCOS MORALES*

Executive Director - Hogar Hispanico

Sandy Pierce

Chairman – Huntington Michigan

Senior Executive Vice President

Private Client Group and Regional Banking Director

Two Towne Square

Southfield, MI 48076

Dear Sandy

It goes without saying that I was surprised by the tone of your letter. Based on your response you clearly misinterpreted the context and purpose of the letter.

First of all, my letter was written as the leader of the Black and Latino CRA Community Leadership Council, not as Executive Director of National Faith. This was clearly stated in the letter and all previous discussions. It was also clear that letter conveyed the thoughts of the group. As a leader, we are charged to represent the group's position without regard to our personal agenda. Just as you represent the bank, and not your personal agenda.

Second, most of the neighborhoods in minority communities have not participated in investment and recovery of Detroit despite the commercials, CDFI investments, public relation stories and photo ops. This has created significant mistrust of banks in our communities. Based on what I believed was a better relationship between us, I sent a candid letter to YOU alone reflecting the thoughts of key community leaders following the meeting. The intent of the letter was to provide YOU with insight to help Us navigate a path to build a strong productive relationship between Huntington and the community. Your response clearly missed the point.

Third, National Faith and Huntington have had a relationship, based on Huntington's total in market funding and the relative impact of agencies there is clear opportunities for growth. At one time, the Detroit Land Bank Authority indicated that 1 in 3 purchase money mortgage borrowers in Detroit were National Faith Clients. Since 2010, NFH has acquired, renovated and resold more than 700 single family residences to LMI families. In addition, we provide more than 800 homebuyer education certificates each year and counsel more than 1000 families and refer more than 500 borrowers that close every year. In this context, Huntington provides \$10,000 to \$20,000 in grant funding toward a \$1.2 million budget. For these grants, NFH has provided significant PR opportunities and loan referrals throughout Southeast Michigan. Keep in mind during this "Good Relationship", NFH has borrowed and repaid more than \$3 million from hard money lenders at rates exceeding 24% APR, because we were unable to borrow from Huntington or any of its CDFI partners despite the Good relationship.

Finally, I want to provide the full context of our relationship as a Black led community organization so that you can fully understand why there is limited trust between banks and our community. NFH receives \$10-20,000 annually (1.5% of a \$1 mm budget) from Huntington despite awarding more homebuyer certs in southeast Michigan, despite third party reports indicating that it accounts for a significant portion of purchase mortgage buyers in Detroit, despite being a major infill developer of affordable housing and despite managing many of the key consumer facing public entity community development programs in Detroit and Wayne County. Meanwhile, my white competitors receive a great deal more for far less impact. I have smiled and lived in a role of being "nice" and accepting "the crumbs off of bankers table" while I work hard to raise approximately \$700,000-\$800,000 in

funding to cover the GAP. Many black non profits that “accept” your niceness and small dollar funding just to have a relationship with your bank in hope that one day they would receive funding that reflects their impact. If you think we like it, we don’t particularly as the years of unequal funding disconnected from impact go on. Your letter only reminds me of how little you understand our true needs and how little you think of our community. NFH has won national awards for productivity and impact and our ability to turn LMI families into approved and viable borrowers is among the leaders nationally. Because our focus is on what’s best for the client, I send loans to you all, regardless to what you give NFH. It has always been about my clients and the community that I serve. You claim to be a Detroiter, but I’m not sure you really understand the hurt that you and the organizations you represent inflict on these organizations. Many banks have pitted us (non profits) against one another for “the scraps off the table”, while our white counterparts are very well funded by your institutions. We are reminded about the slavery that we come from each time we smile and accept your handouts, so please don’t remind me that you have been a partner, because SO HAVE I. The exception is that I’ve been a “real partner” and an invisible Black nonprofit, who refused to fail or lie down. I help thousands of families become homeowners with a staff of five. My team has often gone without paychecks and raises to serve this community. What has Huntington given up?

Finally, I want to reiterate, I sent this letter to you alone to help for context. So that you could help us build trust among our respective stakeholders. I am clearly disappointed in the response.

That being said, I would like to now respond to the balance of your letter as a representative of the Black and Latino CRA Community Leadership Council.

Of course, we are not surprised by your responses, as we never believed that Huntington Bank was prepared to change the way they do business. Your business model appears to be posting news articles that announce and proclaim your intent to support our community that has been ill treated by the banks, starved of access to capital and yet Huntington’s path and plan (which you committed to send as well as data requested, but never sent) is business as usual. We are a group of leaders, non profits, community members that you have decided to refuse to form an agreement with, yet you continue to fund “white outside organizations” to “take care of us” and that funding never gets into the community, and our lives NEVER change. Please read the results of these lending practices. They’re in our face all over the news. Yet, you insist on continuing to want to do business the same way. The last time I checked...that was the definition of insanity. So, our lives don’t change. I continue to wonder if this is a planned action to keep Black and Latino people in a modern day slavery.

As you know when Huntington Bank merged with FirstMerit Bank you created a \$16.1 Billion Community Plan that was supposed to increase mortgage and small business lending in low-to-moderate income communities as well as community development, lending and investments, along with a philanthropy program and other services to increase access to financial services in low-and -moderate income communities and communities of color. That community plan was a HUGE failure, despite the OUTSTANDING CRA Performance Evaluation Huntington has received. I would also like to mention that your most recent CRA Performance Evaluation only covers a period of time from 2012 to 2015.

Sandy, at this moment in time, none of us know exactly how Huntington Bank has been performing. But if it is anything like the spreadsheets Staci Glenn showed us for 2018 and 2019 then I would say you have performed poorly helping low-to-moderate income individuals and geographies access credit for small businesses, home ownership and other banking products and services.

This was proven nationally by an article written by Revel News: Modern Day Redlining - "For people of color, banks are shutting the door to homeownership" based on 2017 HMDA Data.

I am also shocked that you would take the stance to attack my relationship with Huntington Bank, when I am doing the work of a nonprofit, protecting and advocating for the communities I represent.

This is not personal. This is business and it is high time that Banks stop gobbling up our community banks, becoming big conglomerates and then closing 200 branches making it impossible for low-to-moderate income individuals and those vulnerable to access their products and services.

We have asked to see your data, you will not provide it. We have asked that you work with our organization on ensuring that the resources you are committing to Michigan are going to make its way to the organizations that are actually doing the work to support the people of Detroit. You have responded no. You stated that you don't believe that it is productive to enter into a broad based agreement with a community group, but we both know that's not true.

You have partnered with a white organization outside of Detroit to come into our city and create a Community Plan without knowing the Community Partners. The same organization you used last time, which is why the Community Plan was a failure. NCRC knows nothing of Detroit. Yet the money you spend on their conferences, financing their \$70 Million Dollar Buildings in Washington DC and increase their \$150 Million value is insulting to the people of Detroit.

We will not stop until you take our requests seriously and by the way you responded, you are not taking us seriously.

You leave us no alternative but to formally submit multiple letters of complaint about this merger to your public file, we will also send copies to your regulators and we will also request a copy of your most recent CRA Performance Evaluation to be forwarded to our organization once it has been released.

We also would very much like to continue our dialogue, but in a genuine, result driven way. We demand an action that would fund ALL of the organizations in Detroit that are doing result driven work are funded and not the legacy organizations or the social groups that deliver nothing to change the lives of economically depressed Black and Latino Families . We did not ask you to put 150 Million Dollars in our hands or pockets. We asked you to put it into trusted banks, CDFI's and organizations that we have input and direction into, so that we can ensure that these funds actually go into the neighborhoods they were "supposedly" meant for.

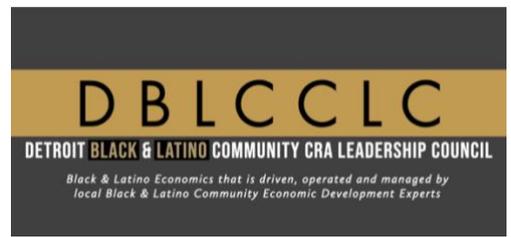
I told you what brought us to your table, a year of watching unspeakable hurt, poverty, murder, a pandemic that killed us most and first and here we are still doing the same dance. No longer!!

Sincerely,



Dina Harris

Cc: Al Pina



**FOR MORE INFORMATION:**

DINA HARRIS – [DINAHARRIS.NATIONALFAITH@GMAIL.COM](mailto:DINAHARRIS.NATIONALFAITH@GMAIL.COM)

PASTOR CHARLES WILLIAMS – [CEWII@HOTMAIL.COM](mailto:CEWII@HOTMAIL.COM)

**JANUARY 29, 2021**

**FOR IMMEDIATE RELEASE**

**DETROIT ECONOMIC JUSTICE LEADERS CALL OUT HUNTINGTON BANK FOR  
DIVESTMENT INTO BLACK AND LATINO COMMUNITIES, REQUESTS PUBLIC HEARING  
FOR ACCOUNTABILITY AND ANSWERS**

**DETROIT, MICHIGAN** – The Detroit Black & Latino Community CRA Leadership Council (DBLCCCLC) held a meeting with Executives from Huntington/TFC Bank Executives to discuss a Detroit CRA (Community Reinvestment Act) Commitment of \$750 Million over 5 years that will target economic inclusion for the Black & Latino communities, small businesses and low-to-moderate income families of Detroit.

Based on past CRA grading from federal regulators, Huntington Bank, a Columbus, Ohio bank, has a negative history with Black and Latino low moderate income communities with marginal access to capital towards Black & Latino home ownership and Black small business development. Black & Latino leaders have expressed significant concerns with a bank that has zero diversity with an “all-white” executive leadership team and a history of dictating CRA programs with marginal economic impact in Black communities.

*The \$750 million CRA commitment will focus on 4 CRA Pillars:*

- 1. Access to Capital for Black/Latino small businesses*
- 2. Access to capital for Black/Latino families to increase home ownership*
- 3. Access to Capital for Black/Latino Affordable Housing Developers to increase affordable housing homes for Blacks/Latinos*
- 4. Grants/Equity investments into Black/Latino Led-Focused nonprofits to build capacity to deliver increased community products/services*

Entering into a CRA community agreement with Detroit Black & Latino Leaders would create more lending opportunities for housing and small business, increase business for Huntington National Bank while providing better service to Detroit’s Black and Latino communities.

As a result of the negligence from Huntington Bank, DBLCCCLC is requesting a public hearing for this proposed merger by the Federal Reserve Board to ensure the Black & Latino communities are heard.

*“We in the Black community of Detroit are utterly disgusted by the leadership of Huntington Bank sending a letter after meeting attempting to control our voice and even how we speak to bring racial economic inclusion for Blacks & Latinos in predominately Black/Latinos zip codes. This is the history of this all white at the top Bank that throws crumbs to our Black families, small businesses and non-profits and expects us to be thankful. These days are over”* states Pastor Williams of the historic King Solomon Church.

Dina Harris of Detroit’s National Faith Home Buyers Program targeting Black & Latino home ownership believes that true economic justice happens when there is an acknowledgment and commitment. *“Huntington Bank CRA leadership speaks to our group and appears sincere to address the racial economic issues our communities have with their bank, then to turn around and send a letter bragging about their outstanding CRA grade shows they have no intention of addressing the racial economic exclusion by Huntington Bank.”*

According to Pastor Alonzo Bell of the Missionary Baptist Church *“The Black communities of Detroit have had enough of Huntington Bank’s double talk. The Black community will publicly march against Huntington Bank if no Detroit focused CRA commitment that includes targeting of Black & Latino zip codes. We are calling on the Federal Reserve Board to hold a meeting in Detroit so they can truly hear the Black voices of Detroit on this proposed merger between Huntington-TCF Banks.”*

DBLCCCLC is an informal Detroit organization made up of minority led & focused organizations and leaders committed to a co-operative approach to address the socio- economic needs of the Black & Latino communities through the creation of sustainable community economic development opportunities. The co-operative relies on a dynamic set of Black & Latino networks, relationships, common socio-economic interests and experiences to assist one another for the better good of the overall socio-economic health of all Black & Latino communities.

###

# MEET THE LEADERSHIP COUNCIL



**ABAYOMI**  
TAWNYA MORRIS - EXECUTIVE DIRECTOR



**COMMUNITY - UP**  
LYSA DAVIS - EXECUTIVE DIRECTOR



**FAMILY TREE AGENCY**  
PAT PEARSON - EXECUTIVE DIRECTOR



**HISTORIC KING SOLOMON BAPTIST CHURCH**  
REVEREND CHARLES E. WILLIAMS II



**NATIONAL FAITH HOMEBUYERS**  
DINA HARRIS - EXECUTIVE DIRECTOR



**REDEEM DETROIT**  
ALONZO BELL - EXECUTIVE DIRECTOR



**CHRIS ALDRIDGE**  
CONSULTANT

# DBLCCLC

DETROIT **BLACK & LATINO** COMMUNITY CRA LEADERSHIP COUNCIL

*Black & Latino Economics that is driven, operated and managed by local Black & Latino Community Economic Development Experts*

## SPECIAL ADVISORY COUNCIL



**Al Pina**  
Chair/CEO - FMCRC-Assets & Hope  
Co-Founder - National Minority Community Reinvestment Co\_Operative



**Marcos Morales**  
Executive Director - Hogar Hispano

To become a member of DBLCCLC or  
for more information contact:

Dina Harris at  
[DinaHarris.nationalfaith@gmail.com](mailto:DinaHarris.nationalfaith@gmail.com)  
or Pastor Charles Williams at  
[cewii@hotmail.com](mailto:cewii@hotmail.com)



**United Way  
of Genesee County**  
Serving Genesee & Shiawassee Counties

February 4, 2021

RE: Merger of Huntington Bank and TCF Bank

To Whom It May Concern:

I am writing a letter of support for the merger of Huntington Bank and TCF Bank. The United Way of Genesee County has enjoyed a strong relationship with Huntington Bank since its merger with First Merit Bank and Citizens Bank prior to that. Huntington Bank has fostered a strong culture of community engagement and service. As a local United Way, we provide support across our region in several key areas that also align with the bank's values. These include equitable housing, workforce development, small neighborhood business development, and addressing basic needs of our community.

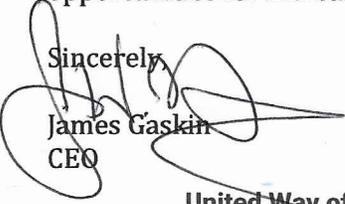
The Regional Huntington Bank team has been engaged with United Way in all three phases of support: Time, Talent, and Treasure. In the area of volunteer engagement hundreds of bank employees from branches, call centers, and management volunteer annually at local projects such as playground builds, care kit assemblies, and our annual MLK event that has produced up to 200,000 packaged meals in one day. Huntington team members also sit on our organizational board in leadership positions and numerous organizational support committees.

In addition to sharing this wealth of talent and time, hundreds of employees donate to United Way through individual payroll deduction programs. The bank also provides financial support through several channels including community reinvestment projects, local trust management, and sponsorships.

One great example of our work together is around transportation. Together the United Way in partnership with Huntington Bank annually provides thousands of rides for individuals and families in emergency situations, to and from work, and to and from health-related services. This partnership has provided over 15,000 rides a year for the past three years. This is just one example of many that demonstrate the Huntington Bank commitment to our community.

More recently we have also started working with TCF Bank and its predecessor Chemical Bank. This team has a similar level of engagement around volunteerism and financial support. We look forward to continuing our relationship with both Huntington Bank and TCF Bank as one united bank system. The strength of this united bank will bring more financial resources to our community and opportunities for increasing investment across our region.

Sincerely,

  
James Gaskin  
CEO

**Jamie Gaskin**  
Chief Executive Officer

**BOARD OF DIRECTORS**

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Chair  
Blue Hawk Distribution Cooperative

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**Randy Wise**  
Randy Wise Automotive Team

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