
From: David Levine
Sent: Friday, May 1, 2020 10:25:53 AM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Subject: [External] Support Letter for E*TRADE and Morgan Stanley Merger

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Please find attached my letter of support for the merger.

As a community-based housing provider in northern Virginia, I believe the merger will only enhance the current level of communitywide supports and partnerships from the two banks.

Respectfully,
David Levine

David Levine
President and CEO
Good Shepherd Housing & Family Services, Inc.

voice: 703 / 768 9404 x116
fax: 703 / 768 9419
www.goodhousing.org

83% of Good Shepherd housing residents are families with children. [Support one of our families today.](#)

Funding by Fairfax County CCFP

CFC#70437

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May 1, 2020

Mr. Ivan Hurwitz, Senior Vice President
Federal Reserve Bank of New York
33 Liberty Street
New York, NY 10045-0001

Dear Mr. Hurwitz,

I am writing in support of the merger between E*TRADE Financial and Morgan Stanley.

As a 46-year-old affordable housing and homeless services provider, Good Shepherd Housing and Family Services (GSH) has consistently risen to the challenge of improving the lives of low-income working families and individuals in our community. With decades of experience as a proven affordable housing and human services provider, GSH enables homeless or near-homeless low-income households — 83 percent of whom are families — to move from their vulnerable situations to housing stability.

For those with a housing-related crisis, our affordable housing programs support our client households to attain both housing and self-sufficiency. By providing struggling families and individuals with our services-supported affordable rental units (currently 106 housing units), we can resolve their greatest basic need — that of affordable housing.

In a concentrated pocket within the Mount Vernon and Lee communities of southeastern Fairfax County, Virginia, particularly along the edges of Richmond Highway from Alexandria to Lorton, live many low-income working families. The region covered by GSH includes this area east of Route 95, south of the City of Alexandria, and north of the Fairfax County border with Prince William County.

GSH has benefited from partnership, support and business relationships with both E*TRADE Financial and Morgan Stanley.

For many years, E*TRADE Financial has provided us annual financial support. On several occasions, E*TRADE has sponsored widely regarded community forums on topics of affordable housing, technology for nonprofits, and social equity. E*TRADE employees have also generously donated their time and expertise to facilitate financial literacy classes for our low-income residents. For the last five

years, GSH has utilized Morgan Stanley Wealth Management based in Rockville, Maryland, to manage our investment account.

In all, as a community-based provider with partnerships to both E*TRADE and Morgan Stanley, I strongly support the merger of the two financial companies. With their outstanding CRA ratings, and with their proven records of community service and outreach, I expect that the newly merged entity will only continue their dedication to the community. If anything, we expect to see more engagement and support for the needy within the community they serve as banking partners.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'D', a checkmark-like symbol, and a long horizontal line.

David Levine
President/CEO, Good Shepherd Housing and Family Services, Inc.

From: Jennifer McAllister
Sent: Friday, May 1, 2020 12:16:35 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Cc: Takahisa, Wendy; Tahir.Alberga@morganstanley.com; David Lipsetz
Subject: [External] Comment Letter: Morgan Stanley Acquisition E*Trade

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To Whom It May Concern:

Attached, please find Housing Assistance Council's comment letter in support of Morgan Stanley's acquisition of E*Trade Financial Corporation. If you have any questions or need additional information, please feel free to contact me at 202-869-1058 or jennifer@ruralhome.org.

Sincerely,

Jennifer

Jennifer McAllister
Housing Assistance Council | Development Manager
1025 Vermont Ave, NW | Suite 606 | Washington, DC 20005
jennifer@ruralhome.org | 202-869-1058
www.ruralhome.org





Housing Assistance Council

1025 Vermont Ave., N.W., Suite 606, Washington, DC 20005, Tel.: 202-842-8600, Fax: 202-347-3441, E-mail: hac@ruralhome.org

www.ruralhome.org

Federal Reserve Bank of New York
Ivan Hurwitz, Senior Vice President
33 Liberty Street
New York, NY 10045-0001

Dear Mr. Hurwitz:

The Housing Assistance Council (HAC) appreciates this opportunity to submit comments to the Federal Reserve Bank of New York regarding Morgan Stanley's acquisition of E*Trade Financial Corporation (E*Trade).

HAC is a national nonprofit organization that helps build homes and communities across rural America. As a community development financial institution (CDFI), HAC delivers financial services and loan products to low-wealth communities. HAC also serves as rural America's "Information Backbone" with leading public and private sector institutions relying on HAC's independent, non-partisan research and analysis to shape policy.

Morgan Stanley has supported HAC's work through its office of Community Development Finance since 2013. Morgan Stanley's flexible programmatic and general operating support allows HAC to respond to the needs of the rural communities that we serve including high-needs regions and groups, such as Indian country, the Mississippi Delta, farmworkers, the Southwest border colonias, and Appalachia. We value their support and commitment to rural America.

Additionally, in 2019 HAC's board approved the transfer of its investment portfolio to Morgan Stanley. HAC's Director of Finance has appreciated the consideration and guidance the Morgan Stanley team has provided regarding our investments.

As part of our research activities, HAC has examined the rates of bank closures since 2010 and the impact on low-income communities. We are encouraged that due to its lack of physical retail spaces, Morgan Stanley's acquisition of E*Trade will not have a deleterious effect on low-income communities and their ability to access financial services and products.

Given these factors, HAC is proud to support Morgan Stanley's acquisition of E*Trade. E*Trade is known throughout the metro Washington, DC community development community for their support. We encourage Morgan Stanley to continue to support E*Trade's nonprofit partners in the Washington-Arlington-Alexandria, DC-VA-MD-WV MMSA.

Thank you for taking the time to consider these comments on Morgan Stanley's acquisition of E*Trade Financial Corporation.

Sincerely,

David Lipsetz
CEO, Housing Assistance Council

**Building
Rural
Communities**

Southeast Office
55 Marietta St
Suite 1350
Atlanta, GA 30303
Tel.: 404-892-4824
Fax: 404-892-1204
southeast@ruralhome.org

Midwest Office
5559 NW Barry Rd
Mailbox #356
Kansas City, MO 64154
Tel.: 816-880-0400
Fax: 816-880-0500
midwest@ruralhome.org

Southwest Office
PO Box 315
San Miguel, NM 88058
Tel.: 505-883-1003
southwest@ruralhome.org

HAC is an equal opportunity lender.

From: Rachael Doss
Sent: Monday, May 4, 2020 11:51:01 AM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Cc: Ed Grenier
Subject: [External] Letter of Support - E*Trade and Morgan Stanley Merger

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

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Dear Mr. Hurwitz:

On behalf of Junior Achievement of Greater Washington, please find attached our letter of support for the E*Trade Financial and Morgan Stanley Merger.

We look forward to partnering with the merged entity to further our community impact.

Thank you,
Rachael

Rachael Doss

Chief Development Officer

Junior Achievement of Greater Washington

919 18th Street, NW | Suite 901 | Washington, DC 20006

202-777-4486 | www.myJA.org | www.3DEschools.org

JA. Know What Matters.

JA. Know What Matters.



MyJA.org
202.296.1200
info@myJA.org

May 1, 2020

Ivan Hurwitz
Senior Vice President
Federal Reserve Bank of New York
33 Liberty Street
New York, NY 10045-0001

Delivered electronically to: Comments.applications@ny.frb.org

Dear Mr. Hurwitz:

On behalf of the Board of Directors, staff and students at Junior Achievement of Greater Washington (JA), we are grateful for and proud of our longstanding partnership with E*Trade Financial Corporation. The purpose of this letter is to express our support for the intended merger between E*Trade and Morgan Stanley. We are confident that the joining of these two financial institutions will strengthen our communities.

JA is transforming education at all levels to be more relevant, experiential, and authentically-connected to the realities and complexities of the real world. In partnership with local school systems and the business ecosystem across the region, Junior Achievement serves over 57,000 students a year, with support from 6,000 volunteer mentors.

As JA continues to innovate and deepen our impact in the lives of youth across the region, we rely on our joint venture with both public and private sector partners. E*Trade has been a mission-critical partner for JA for more than 10 years in delivering hundreds of volunteer hours to support our students, as well as significant annual grants. We are proud to showcase our partnership with E*Trade in our three Finance Parks, a facility-based financial literacy program that serves all public county middle school students in Fairfax County, VA, Montgomery County, MD and Prince George's County MD. The resources that E*Trade provides to JA are invaluable.

E*Trade and Morgan Stanley have both demonstrated their deep commitment and investment in the communities they serve, and JA is confident that their expanded philanthropic reach through this merger will have a meaningful impact on the lives of those living in Greater Washington, and in particular on the lives of JA students.

Junior Achievement of Greater Washington looks forward to partnering with the merged companies to prepare our region's youth for a successful and fulfilled future.

Sincerely,

Ed Grenier
President and CEO
Junior Achievement of Greater Washington



MAIN OFFICE 919 18th Street, NW // Suite 901 // Washington, D.C. 20006

Fairfax County
4099 Pickett Road
Fairfax, VA 22032

Prince George's County
960 Nalley Road
Landover, MD 20785

Montgomery County
12501 Dalewood Drive - 3rd Floor
Silver Spring, MD 20906

From: Bob Shefner
Sent: Friday, May 1, 2020 12:49:17 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Subject: [External] Comments re: Merger between E*Trade and Morgan Stanley

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Attached, please find our comments regarding this merger.

Thank you for the opportunity to make this statement.

Robert L. Shefner
Executive Director



April 29, 2020

Federal Reserve Bank of New York
Ivan Hurwitz, Senior Vice President
33 Liberty Street
New York, NY 10045-0001

To Whom It May Concern:

Jefferson County Community Ministries is in support of the Morgan Stanley/E*TRADE merger. We are an E*TRADE community partner and have benefited from their generous grant program for the last three years.

We understand that both banks are seriously committed to continuing the support of the existing community partners and both banks have received an outstanding Community Reinvestment Act rating. Due to the generosity of E*TRADE, we have been able to assist the vulnerable population of Jefferson County by providing food, clothing, shelter and more.

Thank you for the opportunity to comment and we look forward to the approval of the merger.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. Shefner", with a long horizontal flourish extending to the right.

Robert L. Shefner
Executive Director

From: Thomas Yu
Sent: Monday, May 4, 2020 3:44:57 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Subject: [External] Morgan Stanley

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Dear Mr. Hurwitz,

Attached please find Asian American For Equality's (AAFE) comment letter regarding Morgan Stanley's proposed merger and regulatory review.

Thomas Yu
Co-Executive Director
Asian Americans For Equality (AAFE)
Downtown Manhattan Community Development Corporation (DMCDC)
2 Allen Street, 7th Floor NY NY 10002 | 212-299-0538
thomas_yu@aafe.org



Asian Americans for Equality

2 Allen Street, 7th Floor • New York, NY 10002

Tel: 212-964-2288 • Fax: 212-964-6003 • www.aafe.org



May 4, 2020

Ivan Hurwitz, Senior Vice President
Federal Reserve Bank of New York
33 Liberty Street
New York, NY 10045-0001

Re: Morgan Stanley Community Investment

Dear Mr. Hurwitz:

We are writing as Co-Executive Directors of Asian Americans For Equality, Inc. (AAFE), a 46-year old non-profit community development organization serving the New York City area. AAFE provides affordable housing, social services, small business and homeownership lending, senior care and youth leadership programs to low-income neighborhoods, aiding all who seek our help, with capability to provide Asian-language access.

On behalf of AAFE, we would like to submit this testimony in support of Morgan Stanley's track record in consistently providing much needed operating grants, financial support, and technical assistance to organizations such as AAFE and many others. Over the years, Morgan Stanley has awarded AAFE with flexible grant funds averaging \$50,000 to \$75,000 annually, to help further our mission of neighborhood development and deployment of crucial services to NYC's low income, immigrant and minority communities. Most recently, Morgan Stanley funded AAFE's internal database technology upgrade for our organization to better understand our client needs and how to serve them, which is often a very hard-to-fundraise expense item needed by many non-profit organizations. Beyond financial assistance, Morgan Stanley also provided pro-bono consulting services to improve our immigrant youth programs with key market analysis reports and recommendations on how to address constituency needs. Lastly, as a perennial financial supporter of AAFE's Annual Gala, Morgan Stanley's donations this year went towards a Small Business Emergency Disaster Relief Fund to provide crucial capital to neighborhood mom-and-pop businesses on the brink of collapse due to economic impact of COVID-19.

With Morgan Stanley's generosity and support, AAFE is able to serve our City's most vulnerable populations, and our neighborhoods are better for it. Please feel free to contact us with any questions and thank you for your consideration.

Sincerely,

Jennifer Sun
Co- Executive Director

Thomas Yu
Co- Executive Director

From: Alison Overseth
Sent: Saturday, May 2, 2020 2:45:58 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Cc: Wendy.takahisa@morganstanley.com
Subject: [External] Morgan Stanley and E-Trade: comment on Morgan Stanley as a Community Partner

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Dear Mr. Hurwitz and Colleagues –

It is my pleasure to write you to express the extraordinary experience we have had with Morgan Stanley as a deeply committed partner in our community. The Partnership for After School Education (PASE: pasesetter.org) exists to improve the opportunities available to young people living in poverty in New York City; we are a network of approximately 1600 community-based organizations, who collectively serve well over 500,000 young people every year. With Morgan Stanley's support (financially, intellectually, by sharing their resources, like space, and by serving on our governing body) PASE is able to assure afterschool educators have the tools and resources they need to provide high quality programs in some of the most underserved communities in our city. Some of the resources, investment, wisdom and engagement of Morgan Stanley and its employees are highlighted in bullet points below.

If I can provide any additional information, please do not hesitate to contact me, at this email address or on my cell phone: 917-981-7126.

With warm regards – Alison Overseth

- The **PASE Board of Directors** currently includes one current Morgan Stanley employee, Craig Martone.
 - Also several former Morgan Stanley employees also serve on our Board, including Ken deRegt, Roy Swan, Scott Kelley, and Peter Brookman.
- **PASE's Junior Board** includes a Morgan Stanley employee, John Rusch.
- **Morgan Stanley Community Development Finance** currently funds **three critical PASE programs**:
 - PASE/Landit Women's Leadership Program

- Executive Leadership Series for Small Agencies
 - Morgan Stanley Summer Teaching Fellow
 - In the past, Morgan Stanley also supported Fostering Financial Literacy for Youth
- In September of 2018 PASE was prominently featured on **Morgan Stanley's digital billboards** as part of the **Lights on Broadway** program. As part of that program, PASE held a board fair in Morgan Stanley's offices, inviting Morgan Stanley employees to engage with youth-serving nonprofits around board and volunteer opportunities.
- Morgan Stanley has **hosted numerous PASE events**, including:
 - An Evening with Dr. Beverly Daniel Tatum (Author of Why Are the Black Kids Sitting Together in the Cafeteria?)
 - Annual Summer Teaching Fellow Reception (in August)
 - Annual PASEsetter Winner Reception (in late January)
 - Janet Kelly Lecture featuring Bryan Stevenson
 - PASE Board Meetings
- In 2018, PASE participated in the **Morgan Stanley Scopeathon**, facilitated in partnership with the Taproot Foundation as part of Morgan Stanley's Global Volunteer Month. Over the course of several phone calls and a full-day session, PASE worked with six Morgan Stanley employees (Madhu Coimbatore, Daniela Triana, Mylswamy Karthika, Pete Taylor, Daniela Crompton, and Sandeep Chandane) to create a strategic plan and roadmap allowing PASE to better collect, evaluate, and share our data. Similarly, the year before, PASE participated in Taproot Foundation's **Morgan Stanley Strategy Accelerator Program**, and worked with three Morgan Stanley professionals (Joyce Cadesca, Jon Lanterman, and Omar Parra) to strategize expanding programming to advance the leadership development opportunities for women in the afterschool field. PASE continues to stay in touch with all the consultants from both of these opportunities.
- In **February 2020, PASE honored Carla Harris** of Morgan Stanley as an Afterschool Champion for her commitment to equity in educational opportunities for young people and for promoting women's leadership, notably for women of color.
- **In 2013, PASE honored the Morgan Stanley Foundation and Joan Steinberg** as well as four of our Board Members who, at the time, were Morgan Stanley employees (Roy Swan, Kenneth deRegt, Peter Brookman, in addition to Craig Martone) at the PASEsetter Awards Benefit.
- Morgan Stanley has also been a longtime and generous supporter of our PASEsetter Awards Benefit.
 - The Morgan Stanley Foundation (Joan Steinberg) has been a sponsor and supporter of the PASEsetter Awards Benefit since 2002.
 - Morgan Stanley employees have served on the 2019 PASEsetter Awards Benefit Committee, as well as serving as our auctioneer for several years.

From: Kenneth Trigueiro
Sent: Friday, May 1, 2020 8:10:10 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Subject: [External] re: <https://www.federalreserve.gov/foia/files/morgan-stanley-etradefr-notice-20200401.pdf>.

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Please consider our comments in the attached letter.

**Kenneth
Trigueiro
Executive
Vice
President**
3533
Empleo St
San Luis
Obispo,
CA 93401
Office
(805) 540-
2453





May 1, 2020

Ivan Hurwitz
Senior Vice President
Federal Reserve Bank of New York
33 Liberty Street
New York, NY 10045-0001

RE: Comments on Morgan Stanley, New York, New York; to acquire E*TRADE Financial Corporation, and thereby indirectly acquire E*TRADE Bank and E*TRADE Savings Bank, all of Arlington, Virginia, and thereby operate savings associations, pursuant to Section 4(c)(8) of the BHC Act, as noticed in Federal Register Vol. 85, No. 63, April 1, 2020

Dear Mr. Hurwitz,

We are a community-based affordable housing developer, operating on the Central Coast of California as a 501(c)(3) for 50 years, serving several rural communities in counties with significant agriculturally economies. We have housed approximately 10,000 residents, now living in over 3,000 homes that we have developed. All of our developments serve households who are earning substantially less than the area median income. Throughout our service area, the affordable housing crisis is pronounced. One of our counties holds the infamous title of ranking the least affordable non-metro housing market in the state, as measured by the most recent National Association of Home Builders/Wells Fargo Housing Opportunity Index. Fortunately, we are very active and are successfully providing a robust pipeline of much needed new housing projects, as well as preserving critical existing affordable housing in order to keep it affordable.

Our experience with Morgan Stanley has been very positive. They bring their national resources to a local level, performing like a trusted community banking partner, to genuinely serve unmet community needs. Our partnership has given us credit-backed confidence to take on new opportunities that we would otherwise not be able to, including for community redevelopment projects that otherwise would not attract sufficient credit to undertake. Professional financial advising comes along with their financing, through the bank's experts, to help ensure success of the projects that we intend to partner with Morgan Stanley. Furthermore, they take the approach to first hear and understand the needs we face, then work to provide financing solutions that are a true fit. They are in our experience fairly unique in that regard, especially as a national bank.

Most recently we have become aware of Morgan Stanley's strategic initiative to invest in building of human capital in the nonprofit sector. We fully support this effort, as one of our deepest challenges both as a company and for the nonprofit affordable housing development industry is the severe shortage of qualified and skilled employees, needed to meet the demand. Our hope is that one of the benefits of the merger would be a continued (or even expanded) commitment by the bank in this area, specifically their financial support for internship programs across the country, and especially in rural areas where these career opportunities are most acutely needed.



We support
acquisition of E*TRADE, in furtherance of the their business development plan, since Morgan Stanley
has proven to us at the ground level, that it's leadership is committed to utilizing and investing it's
increasing resources into better and deeper serving markets such as lower-income earning rural
communities and non-metro areas like ours.

Sincerely,

John Fowler, CPA
President & CEO

From: Michael E. Young
Sent: Friday, May 1, 2020 4:56:20 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Cc: Michael E. Young; Fay Wade; Valarie Hunt; Nathaniel Sheppard; Dion Bijou; Farrahdia Mirambeau
Subject: [External] Federal Reserve Comment Period (Morgan Stanley and E*Trade Merger)

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April 30, 2020

Federal Reserve Bank of New York
Ivan Hurwitz, Senior Vice President
33 Liberty Street
New York, NY 10045-0001

**RE: Federal Reserve Comment Period
Morgan Stanley and E*Trade Merger
COMMENTS By Southern Maryland Tri-County Community Action Committee, Inc.,
(SMTCCAC)**

Dear Mr. Hurwitz:

First, let me introduce myself. My name is Michael E. Young and I'm serve as President/CEO of Southern Maryland Tri-County Community Action Committee, Inc. (SMTCCAC). We are a 501(c)3 private nonprofit community action agency designated by the state and federal government to provide services to benefit individuals and families with low-income. As you are aware, the Morgan Stanley and E*TRADE merger is underway and the Federal Reserve comment period is officially open. In consideration of the merger outcome, the purpose of this letter is in support of continued discretionary funding opportunities made available through E-Trade.

The provided funding from this community reinvestment partnership enables tremendous supportive benefits to our bottom-line as we serve the needs of individuals and families that have low-income living in Calvert, St. Mary's and Charles counties. We own 300 affordable housing units and operate about 10 core human services throughout all three counties. Our services include: housing counseling, property management of townhomes and apartments, energy assistance, emergency food, commercial driver's license training, early childhood education, adult medical daycare, services for seniors, etc. We serve about 20,000 to 25,000 individuals annually. We own 8 different locations in southern Maryland.

All too often the nonprofit community is expected to deliver quality services while operating off increased expectations, limited resources and continued unfunded federal and state mandates. The COVID-19 impact has further exacerbated our operations changing the way that we do business, likely forever. The funding helps us in areas whereby federal and state resources can't. The funding is used to support areas including but not limited to the following: information technology improvements (laptops, desktops, monitors, cell phones, software, hardware, security system, etc.), capital improvements and repairs (roofs, carpet, HVAC unit/systems, electrical and plumbing matters, painting, landscaping), enhanced management of our affordable housing stock (personnel cost for management oversight), professional development training for staff, board members and customers, etc. (conferences, webinars, in-house development activities, consultants, etc.)

It is our hope that you can see the value of this community reinvestment partnership and give this letter of support fair and thoughtful consideration. We anticipate that our normal calls for services will quadruple within the months to come. Please help us help those most in need.

I would be happy to address any questions or concerns that you may have at this time. I can be reached at the below contact information provided.

Sincerely,

Michael E. Young MSW
President/CEO
Southern Maryland Tri-County
Community Action Committee (SMTCCAC), Inc.
P.O. Box 280 (Mailing Address)
8371 Old Leonardtown Road
Hughesville, MD 20637
(301) 274-4474, Ext. 253
(301) 357-9605 (cell)
myoung@smtccac.org
www.smtccac.org



"Helping People, Changing Lives"



SMTCCAC

Southern Maryland Tri-County Community Action Committee, Inc.

Michael E. Young, MSW
President and CEO

www.smtccac.org

April 30, 2020

Federal Reserve Bank of New York
Ivan Hurwitz, Senior Vice President
33 Liberty Street
New York, NY 10045-0001

Dear Mr. Hurwitz:

First, let me introduce myself. My name is Michael E. Young and I'm serve as President/CEO of Southern Maryland Tri-County Community Action Committee, Inc. (SMTCCAC). We are a 501(c)3 private nonprofit community action agency designated by the state and federal government to provide services to benefit individuals and families with low-income. In consideration of the merger outcome, the purpose of this letter is in support of continued discretionary funding opportunities made available through E-Trade.

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It is our hope that you can see the value of this community reinvestment partnership and give this letter of support fair and thoughtful consideration. We anticipate that our normal call for services will quadruple in the months to come. Please help us help those most in need.

Sincerely,

Michael E. Young, MSW
President and CEO

From: Joni Clark
Sent: Friday, May 1, 2020 12:06:01 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Subject: [External] Letter of Support for Morgan Stanley

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Ivan Hurwitz,

My name is Joni Clark, Chief Development Officer for Utah Community Action, the largest social service nonprofit in the state of Utah, serving over 50,000 people in Salt Lake and Tooele County who are living in poverty.

I wish to comment in support of Morgan Stanley to the nonprofit community in Utah. Morgan Stanley has historically been an advocate for the low-income population and a pillar in community finance, ensuring CRA funding addresses the deep-rooted issues of poverty. Morgan Stanley is innovative, reliable, knows our community, participates in our community, and is the best partner we have in addressing our client's needs and empowering them on a path to self-reliance. If you have further questions, please feel free to reach out to me.

Best,

Joni Clark

Chief Development Officer | **Utah Community Action**

O: (801) 410-5707 | C: (801) 201-6082

1307 South 900 West, Salt Lake City, Utah 84104

joni.clark@utahca.org | www.utahca.org



From: Michael Griffin
Sent: Wednesday, May 6, 2020 12:55:06 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Subject: [External] Morgan Stanley and E Trade merger Comment Letter

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Attached,

Please find the comment letter for the National Development Council's support of the Morgan Stanley acquisition of E*Trade.

Please feel free to contact me if you have any questions.

Thanks,

Mike

Michael Griffin
Fund Manager
NDC Corporate Equity Fund
(216) 303-7175 | mgriffin@ndconline.org
www.ndconline.org



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Federal Reserve Bank of New York
Ivan Hurwitz, Senior Vice President
33 Liberty Street
New York, NY 10045-0001

Dear Mr. Hurwitz,

We are writing to express our strong support of Morgan Stanley's acquisition of E*Trade. Through its various affiliates, Morgan Stanley has been a dedicated long-term partner of the National Development Council (NDC) as we work to meet our mission of bringing capital to distressed, low- and moderate-income communities throughout the United States. NDC works to bring capital to these areas through technical assistance to local communities, training of community and economic development professionals, small business lending and development of affordable housing and other significant community projects.

It would be difficult to overstate the depth and importance of the relationship Morgan Stanley has had with NDC. Morgan Stanley's relationship with NDC spans almost 20 years. They have been an investor in the last 9 of our NDC Corporate Equity Funds, which invest in Low Income Housing Tax Credit (LIHTC) developments in 31 states, Washington DC and Puerto Rico.

Morgan Stanley is a uniquely important investor for us because we can utilize their funds to serve smaller underserved and rural markets across the country that are not served by other national and regional banks. Over those nine Funds Morgan Stanley has committed \$125 million dollars to this work.

In addition to their investments in our affordable housing funds, Morgan Stanley provides a warehouse line of credit to bridge our equity contribution and close projects into our funds as we finalize investor commitments. Morgan Stanley is also a significant supporter of our small business lending efforts, particularly focused on minority and women owned businesses. Since 2016 they have provided funding by way of a loan facility for our launch of this program of \$2 million and a grant to support operations of \$1.4 million. Since 2012, Morgan Stanley has also supported our lending initiative, Greater Salt Lake Development Corporation with a commitment of \$860,000 in grant funding.

Thank you for taking the time to consider our comments regarding the potential acquisition by Morgan Stanley of E*Trade. We look forward to continuing, and expanding, our work with them as they grow.

Please feel free to reach out to us if you would like to discuss our relationship with Morgan Stanley further.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel Marsh III". The signature is fluid and cursive, with a large loop at the end. It is positioned above the printed name of the signatory.

Daniel Marsh III, President and CEO

From: Patricia Primo
Sent: Wednesday, May 6, 2020 3:13:11 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Cc: Takahisa, Wendy
Subject: [External] Letter of support for Morgan Stanley

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Please see attached letter of support for Morgan Stanley. I can be contacted via email or telephone if you have further questions.

Patricia Primo – Director of Homeownership Services/Interim Chief Executive Officer
Neighborhood Housing Services of New York City, Inc. | www.nhsnyc.org
307 West 36th Street, 12th Floor | New York, NY 10018 | ☎ 212-519-2578 | 📠 eFax 646-383-9303 |
patricia_primo@nhsnyc.org



Federal Reserve Bank of New York
Ivan Hurwitz, Senior Vice President
33 Liberty Street
New York, NY 10045-001

May 5, 2020

Greetings,

On behalf of Neighborhood Housing Services of New York City Inc, I want to extend our support of Morgan Stanley in purchasing E*trade. Morgan Stanley should be commended for undertaking a project of this magnitude.

Neighborhood Housing Services of New York City value the partnership and the integral role Morgan Stanley play in supporting our programs and services in preparing prospective homeowners towards the dream of homeownership.

Through our partnership, we have conducted several outreach programs to the community in the pre-purchase and financial capability space.

We enthusiastically applaud and support the efforts of Morgan Stanley and hope that you give serious consideration to their request.

Sincerely yours,

Patricia Primo

Patricia Primo
Interim Chief Executive Officer
Neighborhood Housing Services of New York City Inc.

From: Dan Adams

Sent: Friday, May 8, 2020 3:55:38 PM (UTC-05:00) Eastern Time (US & Canada)

To: NY Banksup Applications Comments

Subject: [External] Letter of Support for Morgan Stanley Acquisition of E*Trade

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Attached is a letter of support for Morgan Stanley's acquisition of E*Trade.



Daniel J. Adams, Executive Director

Utah Center for Neighborhood Stabilization, A Utah Nonprofit Corporation

📍 : 6880 South 700 West, Office 102, Midvale, UT 84047-4513

☎ : (801) 316-9112 | 📞 : (801) 450-2762 | ✉ : dan@utcns.com



April 29, 2020

Federal Reserve Bank of New York
Ivan Hurwitz, Senior Vice President
33 Liberty Street
New York, NY 10045-0001

Also sent electronically to Comments.applications@ny.frb.org

Dear Mr. Hurwitz:

We welcome the opportunity to support Morgan Stanley in its acquisition of E*Trade.

Morgan Stanley has been active in the Utah market in providing much needed community development loans and service and qualified investments for years through its CRA program.

The Utah Center for Neighborhood Stabilization (UCNS) is an umbrella organization for several affiliates that primarily finance affordable housing and small businesses. Our beginning was in the formation of the Utah Center for Affordable Housing (UCAH) in 2009 to address a specific need from the great recession and foreclosure crisis which preceded it.

In 2015, UCNS responded to a need within our community to establish a transit-oriented development (TOD) fund focused on financing of affordable housing. As we surveyed lenders willing to work with us, Morgan Stanley was one of the first banks to offer their services and to participate in the fund. Morgan Stanley staff provided lending expertise in creation of the loan fund to leverage state and federal dollars while the fund provided developers access to acquisition, predevelopment, and construction dollars for multifamily housing that benefits LMI families throughout Utah.

The Fund was established in 2015 for a total of \$35 million of which \$7 million are federal and state dollars and \$28 million are from financial institutions, of which Morgan Stanley participates in the UETOD with a commitment of \$2 million for acquisition and predevelopment financing. To date, the Fund has closed 11 loans since inception totaling \$24.1 million. The fund has financed 1,209 units of housing.

UCNS has benefited additionally through the expertise of Morgan Stanley staff who serves on our board and on various committees. I am grateful for the expertise they bring in community development finance to our organization to make our lending dollars more impactful to low- to moderate-income (LMI) recipients within our community.

Based on Morgan Stanley's commitment to Utah, I am confident that they will continue to have a positive impact in communities they serve after the acquisition of E*Trade.

Again, I provide my support for this acquisition and encourage the Federal Reserve to approve this acquisition by Morgan Stanley.

With kind regards,



Daniel J. Adams



Daniel J. Adams, Executive Director
Utah Center for Neighborhood Stabilization, A Utah Nonprofit Corporation
📍 : 6880 South 700 West, Office 102, Midvale, UT 84047-4513
☎ : (801) 316-9112 | 📞 : (801) 450-2762 | ✉ : dan@utcns.com

From: Tom Collishaw
Sent: Monday, May 11, 2020 8:08:24 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Subject: [External] Proposed Morgan Stanley acquisition of E*Trade

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Federal Reserve Bank of New York
Ivan Hurwitz, Senior Vice President
33 Liberty Street
New York, NY 10045-0001

Mr. Hurwitz:

Self-Help Enterprises (SHE) is a nonprofit housing and community development organization that has served the San Joaquin Valley of California since 1965. We have developed and/or preserved over 15,000 units of housing for low income families during our history, including pioneering a vibrant single family sweat equity home ownership program known as mutual self-help housing. We are taking this opportunity to provide a testimonial for Morgan Stanley as an important partner in our affordable housing development work.

With the passage of the Tax Cuts and Jobs Act in late 2017, the bottom fell out of the market for Low Income Housing Tax Credits (LIHTC), the single largest driver of affordable rental housing development in the country. Most traditional investors abandoned the market altogether, rendering many projects infeasible. With strict timelines to begin construction of such projects, we desperately searched for a corporate investor to work with our syndicator National Equity Fund in order to move forward on three substantial developments in two of the poorest counties in California (Tulare and Kern.) Morgan Stanley came through on these deals as the upper tier investor at that critical moment in time.

Since completing those projects successfully, we have seen Morgan Stanley become a leader in creating an affordable housing preservation lending product as well. While we have not yet utilized this innovative credit facility, we anticipate doing so in the near future.

While it is not generally in our wheelhouse to take sides on proposed acquisitions or mergers, we are always prepared to share stories about the partners who can be counted on when all appears lost. Morgan Stanley falls squarely into that category for us. If you are in need of additional information, please do not hesitate to reach out.

Tom Collishaw
President & CEO

Tom Collishaw

President / CEO

Self-Help Enterprises



8445 W. Elowin Court
P.O. Box 6520
Visalia, CA. 93290
559-802-1620 Office
559-651-3634 Fax
TomC@selfhelpenterprises.org
www.selfhelpenterprises.org

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From: Donna Walker James
Sent: Tuesday, May 12, 2020 6:10:10 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Subject: [External] Federal Reserve Comment Period

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Dear Mr. Hurwitz,

Due to COVID-19 and lack of access to our office, I am belatedly sending this letter of support for both E*TRADE and Morgan Stanley, to praise their community connections.

Thank you,

Donna Walker James

Donna Walker James

Executive Director, Computer CORE
5881 Leesburg Pike, #204
Falls Church, VA 22041
Donna@ComputerCORE.org
703-931-7346, ext. 5/Cell 703-928-0619
EIN #54-1968428





computer core

5881 Leesburg Pike, #204
Falls Church, VA 22041
EIN# 54-1968428
703.931.7346
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Donna Walker James



United Way
of the National
Capital Area

United Way #8289
CFC #60280

May 12, 2020

Ivan Hurwitz, Senior Vice President
Federal Reserve Bank of New York
33 Liberty Street
New York, NY 10045-0001

Dear Mr. Hurwitz,

I am writing to express our appreciation of E*TRADE and our support for the acquisition by Morgan Stanley. Both E*TRADE and Morgan Stanley are known for their care of the community. We have appreciated being a community partner of E*TRADE's since at least 2011. One aspect of this relationship has been an annual grant opportunity that helps to fund some of Computer CORE's basic operating costs. This grant has been \$20,000 per year since 2011 or nearly \$200,000 in critical revenue.

Also, we wanted to take this chance to say that E*TRADE has been more than a funder. Our staff contacts, Vickie Tassan and Carolyn Ibacache, have been skilled at making sure this is more than a grant program. They truly advise the non-profit field in our region and offer strong impactful leadership. In addition, our entire staff and adult computer students have been invited to participate in training provided by Tech Impact on a very regular basis. The training is interesting, timely and accessible even for nonprofit staff members who know less about tech than we should, but are eager to learn. Currently, E*TRADE is recruiting volunteers to help us launch the tutoring component of our Distance Learning programming.

We are very thankful for the community work done by E*TRADE and look forward to a continued relationship with Morgan Stanley.

Sincerely,

Donna Walker James
Executive Director



68 Wind Road, Baskerville, VA 23915
(434) 676-1084

July 21, 2020

Jerome H. Powell
Chair of the Board of Governors
Federal Reserve System
20th & Constitution Ave., NW
Washington, D.C. 20551

Dear Mr. Powell:

On behalf of the National Black Farmers Association (“NBFA”), we urge the members of the Board of Governors for the Federal Reserve System (“Board”) to reject the merger of Morgan Stanley and E*TRADE Financial Corporation (“E*TRADE”) as proposed. The Board is charged with the critical task of reviewing the merger between Morgan Stanley and E*TRADE to assess whether the merger reduces competition, and if it does, the Board has the authority to reject the application.

The NBFA is a non-profit organization representing tens of thousands of African American farmers and their families in the United States. The NBFA provides education services and advocacy efforts concerning civil rights, land retention, access to public and private loans, education and agricultural training, and rural economic development for black and other small farmers. The NBFA has fought discrimination on all fronts and has been a driving force in remedying past discrimination by the United States government. The NBFA seeks to ensure access to financial resources on equal terms.

Access to financial resources on equal terms is a matter of critical importance to the NBFA, its members and their families. The NBFA is deeply concerned with the consolidation of financial institutions Morgan Stanley and E*TRADE both on its own terms, and as a troubling trend that makes capital, financial and loan services less accessible to the communities where NBFA members earn their livelihoods. Both the NBFA and members are, or have been, customers of Morgan Stanley and E*TRADE. The NBFA has members throughout the Southeastern United States, including hundreds of members in rural areas, where the effects will be felt the most. The NBFA is deeply troubled by the consequences that another mega financial institution merger will bring to its members and therefore to the local communities affected by the proposed merger.

The NBFA is concerned that the megamerger of Morgan Stanley and E*TRADE will have disproportionate effects in rural and economically disadvantaged areas. Both firms are engaged in financial services and provide lending services to businesses and clients, but they lack retail spaces in rural communities. As we all know, both public and private lenders have a long history of discriminating against black farmers, preventing black farmers from owning land or receiving

the same financial supports as their white counterparts. Such structural racism has nearly wiped out black-owned family farms in America. Through recent banking consolidations, low-income, rural, and predominantly-black communities have lost national and community bank branches. This loss has created barriers to credit access in these communities. While this merger does not raise those specific issues because of Morgan Stanley's and E*TRADE's lack of retail locations, consolidation of Morgan Stanley and E*TRADE still raises significant competition concerns and is not likely to provide any benefits to rural disadvantaged communities.

First, the combined firm's reliance on the use of virtual technology disadvantages rural farmers and members of the NBFA. Morgan Stanley's and E*TRADE's investment and lending solutions and services are focused on their digital capabilities and they put little effort into rural America. This sounds great for banking consumers that have internet access, but it does nothing for rural communities. The problem is that forty percent of NBFA members do not have online services in their homes. The undeniable truth is that recent banking consolidation only exacerbates black farmers' barriers to credit access. As more money flows through large centralized institutions, low-income, rural, and predominantly-black communities have disproportionately lost.¹ Accordingly, this merger does not benefit rural communities and could cause further harm to rural agricultural farmers, as the combined firm has no interest in serving rural America.

Second, this merger raises antitrust concerns that should be scrutinized before the Federal Reserve approves the application. It is our understanding that Morgan Stanley also gets E*TRADE's lower-profile business managing stock that employees at corporations receive as part of their compensation. Notably, Morgan Stanley already has such a business, which it bolstered early last year by buying Solium Capital Inc. ("Solium"). The overlap between Morgan Stanley and E*TRADE's corporate-stock-plan businesses, which allow individuals to manage the stock their employers issue to them as a form of compensation, appears to be an issue that should be investigated.² That unit has proven to be one of the fastest-growing businesses that E*TRADE has running today. UBS analyst Brennan Hawken called the corporate services business "the key asset within E*TRADE." In an interview, Hawken said that "Stock plans are vehicles for wealth creation." Morgan Stanley built up its presence in the space in 2019 when it acquired Solium, that is now known as Shareworks by Morgan Stanley. After the E*TRADE deal closes, about one-sixth of Morgan Stanley's assets are expected to come from the combined company's corporate-stock-plan businesses.

Morgan Stanley's purchase of Solium, the most popular software platform for employee stock plans, makes it difficult for rivals to compete. According to the Merger Agreement, Morgan Stanley's purchase of E*TRADE could raise potential competition concerns with respect to the equity plan administration market, and specifically in the context of insourced systems that customers license to manage stock plan administration internally (i.e., "partial" stock plan administration where execution is outsourced, but administration is licensed in house). The Federal Reserve needs to make sure that adequate competition exists with respect to the equity

¹*Racialized Costs of Banking*, New America available at <https://www.newamerica.org/family-centered-social-policy/reports/racialized-costs-banking/the-racialized-costs-of-banking/>.

² Declan Harty and Zhaib Gull, *Analysts See Pipeline of Business Awaiting Morgan Stanley in E*TRADE Deal*, S&P Global Market Intelligence, March 2, 2020.

plan administration and in partial stock plan administration (i.e., licensing of systems for in-house use) markets.

In summary, the Federal Reserve should reject the merger. The merger presents clear competition concerns. The merger does nothing to promote competition in rural and disadvantaged areas and their continued focus on digital technologies will continue to disproportionately harm African American farmers in rural locations. This merger continues a trend of consolidation of financial institutions that only reduces competition and consumer choice.

Sincerely,

A handwritten signature in black ink, appearing to read "John Boyd". The signature is fluid and cursive, with a large loop at the end.

John Boyd
President of National Black Farmers Association

From: Markus Larsson
Sent: Wednesday, May 13, 2020 11:24:00 AM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Cc: Tassan, Vickie; Ibacache, Carolyn
Subject: [External] Letter of support for E*TRADE/Morgan Stanley Merger

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Dear Mr. Hurwitz,

Please see attached Life Asset's letter of support for E*TRADE/Morgan Stanley merger.

Sincerely,

Markus Larsson

Life Asset

Markus Larsson, Executive Director

2448A 18th Street NW, Washington, DC 20009

Email: mlarsson@lifeasset.org

Cell: 202-549-6118



2448A 18th Street NW
Washington, DC 20009
(202) 709-0652 | LifeAsset.org

Monday, May 11, 2020

Federal Reserve Bank of New York
Ivan Hurwitz, Senior Vice President
33 Liberty Street
New York, NY 10045-0001

SUBJECT: E*TRADE/MORGAN STANLEY MERGER

Dear Mr. Hurwitz,

Life Asset strongly supports the merger of E*TRADE and Morgan Stanley. Life Asset is a CDFI focused on micro-lending in the Washington, DC metropolitan region. We began our relationship with E*TRADE about 7 years ago with our first grant. This support has enabled Life Asset to strengthen the operations of the organization, get certified as a CDFI and double our lending capacity. We were very appreciative of the flexibility of E*TRADE's support which is very unusual in our region.

In addition, E*TRADE provided support through its participation on our Board of Directors. Vickie Tassan's leadership encouraged her teammates including Olive Idehen and Carolyn Ionita to be hands-on with the organization. Today, Steve Pearlman is a valued member of our Board. E*TRADE also provided much needed technology support through a partnership they have with Tech Impact.

We are excited about the potential impact the upcoming merger will have in the community development industry of the Washington, DC metropolitan area. Our hope is that there will be increased financial and technical support for our sector. We look forward to continuing our work with the new entity.

Sincerely,

A handwritten signature in black ink that reads "Markus Larsson".

Markus Larsson
Executive Director

From: George Davies
Sent: Tuesday, May 12, 2020 10:08:15 AM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Cc: Olive Idehen; 'Tassan, Vickie'; Ibacache, Carolyn
Subject: [External] Support of Merger of E-Trade and Morgan Stanley

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E-Trade has been a wonderful partner of CFH, Inc. over the past seven years and we look forward to working with Morgan Stanley and its team upon completion of this merger. Attached you will find a letter of support.

George Davies
CFH, Inc.
Executive Director

www.cfhva.org

Phone (703)221-4510

Fax (703)221-3708

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Phone (703) 221-4510

Email: info@cfhva.org

Fax (703) 221-3708

www.CFHVA.org

Monday, May 11, 2020

Federal Reserve Bank of New York

Ivan Hurwitz, Senior Vice President

33 Liberty Street

New York, NY 10045-0001

SUBJECT: E*TRADE/MORGAN STANLEY MERGER

Dear Mr. Hurwitz,

CFH, Inc. strongly supports the merger of E*TRADE and Morgan Stanley. CFH provides housing opportunities to limited-income individuals in 21 counties in Northern Virginia. We began our relationship with E*TRADE about 7 years ago with our first grant. E*TRADE since then has consistently given us the second largest annual support which has helped the organization to strengthen its operations and programs. The flexibility and reliability of this support has been very much appreciated and is certainly very unusual in our region.

E*TRADE provided additional support through the participation of Russul Alamire on our Board of Directors. Vickie Tassan's leadership also encouraged her teammates including Olive Idehen and Carolyn Ionita to be hands-on with our organization by providing much needed technical assistance to the organization's programs.

We are excited about the potential impact the upcoming merger will have in the community development industry of Northern Virginia. Our hope is that there will be increased financial and technical support for our sector. We look forward to developing an even greater relationship with Morgan Stanley and its incredible staff.

Sincerely,

George Davies

Executive Director

CFH, Inc.

Providing affordable housing opportunities in Northern Virginia since 1979

From: Stan Keasling
Sent: Tuesday, May 12, 2020 11:24:00 AM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Subject: [External] Proposed Morgan Stanley Acquisition of E*Trade

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Attached please find my comments on this proposed acquisition. Thank you for the opportunity to comment.

Stan
Stanley Keasling
RCAC| Project Manager
(916) 761-3717 (cell)
www.rcac.org

Ivan Hurwitz, Senior Vice President

Federal Reserve Bank of New York

Dear Mr. Hurwitz,

It is my pleasure to write in support of Morgan Stanley's acquisition of ETrade. I am a member of the Community Advisory Board for Morgan Stanley, and the former CEO of the Rural Community Assistance Corporation. It has been my pleasure and good fortune to work with the dedicated staff at Morgan Stanley, and to watch them build a very successful community reinvestment program founded on one very important principle, finding places where they can add value.

Morgan Stanley has demonstrated their commitment to CRA in their willingness to fund rural affordable housing deals that were definitely not the most desirable projects. They leveraged their investment in low income housing tax credit funds to motivate the National Equity Fund to provide equity to rural deals. They regularly participated in the construction financing of rural housing deals in Utah and surrounding states and were willing to take a lower interest rates or lower loan fees to make the deal more appealing to participating lenders.

Morgan Stanley has been especially aggressive in California in response to natural disasters in our state. They have provided resources to nonprofit affordable housing developers so they in turn can be aggressive about developing more projects to replace sorely needed affordable units. This activity started with the fires in Sonoma County and extended to the fires in Ventura and Butte County.

This is a description of just some of their impact in rural parts of the west, and based on our experience, I know that there are similar examples from their work in other parts of the country.

I encourage you to take these efforts into consideration as you review their pending application.

Sincerely,

Stanley Keasling

From: [NY Banksup Applications Comments](#)
To: [Whidbee, Robin](#); [Caetano, Ruth](#); [Brannon, Lisa](#); [Hosein, Nadira](#)
Subject: FW: Letter of Support for Morgan Stanley's proposed acquisition of E*TRADE
Date: Tuesday, May 12, 2020 4:01:36 PM
Attachments: [MS Support Letter.pdf](#)

From: Kristine Miranda
Sent: Tuesday, May 12, 2020 4:01:01 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Cc: Cynthia Parker
Subject: [External] Letter of Support for Morgan Stanley's proposed acquisition of E*TRADE

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Dear Sir or Madam:

Please find BRIDGE Housing's Letter of Support for Morgan Stanley's proposed acquisition of E*TRADE.

Thank you,
Kristine Miranda

Kristine Miranda | Director of Capital and Policy Initiatives
BRIDGE Housing | 600 California Street, Suite 900 | San Francisco, CA 94108
T: 415.321-3522 C: 408-759-1349 | bridgehousing.com



BUILDING SUSTAINING LEADING

BRIDGE HOUSING
CORPORATION

BRIDGE PROPERTY
MANAGEMENT COMPANY

BRIDGE ECONOMIC
DEVELOPMENT CORPORATION

May 11, 2020

Mr. Ivan Hurwitz
Senior Vice President
Federal Reserve Bank of New York
33 Liberty Street
New York, NY 10045-0001

*Re: Morgan Stanley acquisition of E*TRADE*

Dear Mr. Hurwitz:

I am writing to provide comments to the Federal Reserve Bank of New York ["FRBNY"] in support to the approval of the application filed by Morgan Stanley to acquire E*TRADE.

BRIDGE Housing is a nonprofit, affordable housing developer in California, Oregon and Washington state. BRIDGE's mission is to strengthen communities and improve the lives of residents, beginning - but not ending - with affordable housing. BRIDGE has created or preserved more than 18,000 units of affordable housing and served an estimated 45,000 low- and moderate-income individuals and households.

Morgan Stanley has been an important partner in pursuance of our mission. For example, Morgan Stanley was a critical partner in the preservation of the Mariposa Apartments in the City of Mountain View, CA. Mariposa is a 48-unit project that serves households making 80% or less of Area Median Income. Morgan Stanley also participated in our Coronado Springs preservation, a 332-unit project in Seattle, WA, serving families earning 50%-60% of Area Median Income.

Thank you for the opportunity to comment on this matter. Please let me know if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cynthia Parker".

Cynthia Parker
President and CEO

From: Maryann Dillon
Sent: Friday, May 29, 2020 1:28:10 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Cc: Tassan, Vickie; Ibacache, Carolyn
Subject: [External] Morgan Stanley/ETrade merger letter

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Attached please find a letter supporting all of E*Trade's efforts to support community development over the years for your consideration as you review the proposed Morgan Stanley/E*Trade merger.



Maryann Dillon

Executive Director

Housing Initiative Partnership, Inc.

6525 Belcrest Rd., Ste. 555

Hyattsville, MD 20782

p: [\(301\) 985-1252](tel:(301)985-1252)

f: (301) 699-8184

e: mdillon@hiphomes.org

www.hiphomes.org



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-Catalogue for Philanthropy

From: Courtney Reeve
Sent: Friday, May 29, 2020 11:15:54 AM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Subject: [External] Public Comment: E*TRADE - Morgan Stanley Merger

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To Whom It May Concern:

As a longtime community partner of E*TRADE, I am writing to express Aspire! Afterschool Learning's support of the E*TRADE – Morgan Stanley merger.

For more than 15 years, Aspire! has benefited from E*TRADE's investment in our programs providing daily afterschool and summer programs to kids at risk of falling into the achievement gap, through their CRA budget. For nearly 10 years, the level of support has been especially significant for an organization of Aspire!'s size, providing \$40,000 each year to help children from low-income households improve their reading.

I know that many of Aspire!'s partner organizations also receive significant support from E*TRADE whose investment in the local Arlington, Virginia low-income community has been impactful.

As the merger occurs, it is my hope that Morgan Stanley will maintain a strong commitment to the local Arlington, Virginia community. Withdrawal of this support would have a clear negative impact on the region in no uncertain terms.

Thank you for your consideration.

Best,

Courtney C. Reeve

NOTE: DUE TO THE GOVERNOR'S ORDERS RE COVID-19, **ALL ASPIRE!
PROGRAM SITES AND OFFICES WILL BE CLOSED THROUGH JUNE 10.**
PLEASE NOTE THAT OUR PROGRAM HAS MOVED TO AN ONLINE
PLATFORM AND OUR TEAMS ARE WORKING REMOTELY.

Courtney C. Reeve
Executive Director

703.379.6488 x102



July 22, 2020

The Honorable Jerome Powell
Chair
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue N.W.
Washington, D.C. 20551

Dear Chair Powell:

Morgan Stanley has applied to the Federal Reserve Board to acquire E*Trade Financial Corporation. For the following reasons related to financial stability, competition, and general compliance failures, this application fails the relevant legal test and should therefore be rejected by the Fed.¹

Rejecting this acquisition would also be consistent with the spirit of the request from nine economic justice organizations for the Fed to freeze merger and acquisition activity for organizations receiving support through the Fed's COVID-19 emergency lending programs.²

Financial Stability: Morgan Stanley is already a “Too Big to Fail” bank, and this merger would make it even bigger.

Leading up to the 2008 financial crisis, Morgan Stanley had been a standalone investment bank. It was forced to convert to a bank holding company in the depths of the financial crisis to access Fed supervision and the sweep of the Fed's safety net.³ The bank received substantial taxpayer assistance, to the tune of \$10 billion from the TARP bailout program and a peak of \$135 billion borrowed through the Fed's emergency lending programs.⁴ It was, by definition, a Too-Big-to-Fail (TBTF) bank. Twelve years later, Morgan Stanley is the sixth largest U.S.-based bank holding company, with \$947 billion in total assets and nearly \$1.2 trillion in total financial exposures.⁵ It employs more than 60,000 people, operating across 47 jurisdictions worldwide

¹ For an application of this nature, the Fed must consider whether “benefits to the public, such as greater convenience, increased competition, or gains in efficiency,” would “outweigh possible adverse effects, such as undue concentration of resources, decreased or unfair competition, conflicts of interests, unsound banking practices, or risk to the stability of the United States banking or financial system.” See 12 U.S.C. § 1843(j)(2)(A).

² See Press Release, Amer. Econ. Liberties Proj., “The Federal Reserve Must Not Finance a Merger Wave,” May 7, 2020, <https://www.economicliberties.us/press-release/the-federal-reserve-must-not-finance-a-merger-wave/>.

³ See Bd. of Governors of the Fed. Reserve Sys., Order Approving Formation of Bank Holding Companies and Notice to Engage in Certain Nonbanking Activities, Sept. 21, 2008, <https://www.federalreserve.gov/orders20080922a2.pdf>. Although it was not legally a “bank,” Morgan Stanley took deposits while being subject to lighter regulation as an “industrial loan company,” a longstanding loophole in banking law that allows nonbank companies to own banks. See *id.*

⁴ See Congressional Oversight Panel for TARP, March Oversight Report: the Final Report of the Congressional Oversight Panel 36, Mar. 16, 2011, <http://cybercemetery.unt.edu/archive/cop/20110401232213/http://cop.senate.gov/documents/cop-031611-report.pdf>.

Morgan Stanley also fell \$1.8 billion short of its required capital buffer in the 2009 stress tests. See Board of Governors of the Federal Reserve System, The Supervisory Capital Assessment Program: Overview of Results 31, May 7, 2009, <http://www.federalreserve.gov/bankinforeg/bcreg20090507a1.pdf>.

⁵ See data from forms FR Y-9C and FR Y-15 as of Q1 2020.

through thousands of unique legal entities.⁶ It has been identified by the international Financial Stability Board as a Global Systemically Important Bank,⁷ meaning that it is a financial company whose “disorderly failure ... would cause significant disruption to the wider financial system and economic activity.”⁸ In short, it is still a TBTF bank.

The balancing and tradeoffs required by the Fed’s financial stability evaluation are not necessarily straightforward, nor have they been fully developed.⁹ Former Federal Reserve Governor Daniel Tarullo has argued that there should be a “strong, though not irrefutable, presumption of denial for any acquisition” by a global systemically important bank,¹⁰ and that there is “little evidence that the size, complexity, and reach of some of today’s [systemically important banks] are necessary in order to realize achievable economies of scale and scope.”¹¹ In addition, the application presently under consideration would increase Morgan Stanley’s systemic importance to levels that would exceed its importance prior to the 2008 financial crisis and bailouts,¹² a fact that should render this application unacceptable under the generally articulated financial stability test that the Fed has said it would apply to mergers and acquisitions in past cases.¹³ Under either test, the Fed must deny this application on the basis of financial stability.

⁶ See FFIEC National Information Center data; see also Morgan Stanley, 2019 Resolution Plan, <https://www.fdic.gov/regulations/reform/resplans/plans/morgan-165-1907.pdf>.

⁷ See Fin. Stability Bd., 2018 List of Global Systemically Important Banks (G-SIBs), Nov. 2018, <https://www.fsb.org/wp-content/uploads/P161118-1.pdf>.

⁸ See Fin. Stability Bd., Reducing the Moral Hazard Posed by Systemically Important Financial Institutions 1 (Oct. 2010), https://www.fsb.org/wp-content/uploads/r_101111a.pdf.

⁹ See Daniel K. Tarullo, Member, Bd. of Governor of the Fed. Reserve Sys., “Financial Stability Regulation,” Speech at the Distinguished Jurist Lecture, Univ. of Penn. L. Sch., 15-22 (Oct. 10, 2012), <https://www.federalreserve.gov/newsevents/speech/files/tarullo20121010a.pdf>; see also Jeremy C. Kress, *Modernizing Bank Merger Review*, 37 YALE J. ON REG. 435, 470 (2020)(the Fed’s financial stability analysis “lacks clarity and analytical rigor.”). For example, the Fed has approved mergers and acquisitions by large regional banks in recent years that appear on their face to increase risks in the banking system. See Bd. of Governors of the Fed. Reserve Sys., Order Approving Acquisition of a State Member Bank, Dec. 23, 2011 (approving the acquisition of RBC Bank by PNC Financial Services), <https://www.federalreserve.gov/newsevents/pressreleases/files/order20111223.pdf>; see also Bd. of Governors of the Fed. Reserve Sys., Order Approving the Acquisition of a Savings Association and Nonbanking Subsidiaries, Feb. 14, 2012 (approving the acquisition of ING Bank by Capital One Financial), <https://www.federalreserve.gov/newsevents/pressreleases/files/order20120214.pdf>; see also Bd. of Governors of the Fed. Reserve Sys., Order Approving the Merger of Bank Holding Companies, Nov. 19, 2019 (approving the merger of BB&T and SunTrust), <https://www.federalreserve.gov/newsevents/pressreleases/files/orders20191119a1.pdf>.

¹⁰ Tarullo, *supra* note 9, at 21; see also Daniel K. Tarullo, Member, Bd. of Governors of the Fed. Reserve Sys., “Regulating Systemically Important Financial Firms,” at 6, Remarks at the Peter G. Peterson Inst. for Int’l Econ., 6 (June 3, 2011) (the regulation of systemically important banks “should discourage systemically consequential growth or mergers unless the benefits to society are clearly significant[.]”), <https://www.federalreserve.gov/newsevents/speech/files/tarullo20110603a.pdf>.

¹¹ *Id.*

¹² Its volatile, short-term funding makes up more than 80% of its assets adjusted for risk. See FR Y-15 data. While it may be argued that the E*Trade acquisition will expand Morgan Stanley’s deposit base, the more significant expansion resulting from this acquisition would be to Morgan Stanley’s wealth management activities that bring with them the risks associated with asset management. See, e.g., Kenechukwu Anadu, et al, *The Shift From Active to Passive Investing: Potential Risks to Financial Stability?*, at 25-27, RPA Working Paper 18-04 (Aug. 27, 2018), available at SSRN: <https://ssrn.com/abstract=3244467>.

¹³ See Bd. of Governors of the Fed. Reserve Sys., Order Approving the Acquisition of a Savings Association and Nonbanking Subsidiaries, *supra* note 9, at 28 (the Fed “expects that it will generally find a significant adverse effect

Competition: Morgan Stanley has plans to build up a large position in wealth management, and it should not be allowed to do so.

The predominate purpose of this transaction is Morgan Stanley's acquisition of \$3.1 trillion in wealth management assets. It is in a position to do so at a relative bargain due to the competitive price wars and consolidation of the two other biggest retail brokers, Charles Schwab and TD Ameritrade.¹⁴ While traditional bank merger analysis has focused on measures that are in many ways outdated in the context of modern, large, and complex banking conglomerates,¹⁵ the resulting implications for current and future asset management markets must be considered in this case.

Morgan Stanley has long pursued a growth strategy centered around its wealth management business.¹⁶ Its wealth management division has grown substantially in recent years, due in part to another acquisition, when Morgan Stanley was allowed to purchase the Smith Barney brokerage from Citigroup.¹⁷ Morgan Stanley has stated publicly that the company's goal is adding an additional one million clients through technology alone,¹⁸ and competing with the largest wealth managers.¹⁹ This acquisition would give it scale sufficient to capture even more market share. To be sure, the asset management industry is currently concentrated among a small group of giant companies.²⁰ The answer to this problem is not to anoint another member of this club; instead, the goal should be to increase competition by decreasing concentration.

Morgan Stanley has also been open about its desire to cross-sell individual products to customers of its corporate plan management business,²¹ as well as to sell other products to customers that

if the failure of the resulting firm, or its inability to conduct regular-course-of-business transactions, would likely impair financial intermediation or financial market functioning so as to inflict material damage on the broader economy.”).

¹⁴ See Liz Hoffman, *Morgan Stanley Is Buying E*Trade, Betting on Smaller Customers*, WALL ST. J., Feb. 20, 2020, <https://www.wsj.com/articles/morgan-stanley-is-buying-e-trade-betting-on-littler-customers-11582201440>.

¹⁵ See Kress, *supra* note 9, at 439.

¹⁶ See Justin Baer & Saabira Chaudhuri, *Gorman's Strategy Pays Off for Morgan Stanley*, WALL ST. J., Oct. 18, 2013 (noting “efforts by [CEO James] Gorman to transform the New York investment bank into a firm that relies less on trading and more on businesses like wealth management.”), <https://www.wsj.com/articles/morgan-stanley-swings-to-3rdquarter-profit-on-strong-wealth-management-results-1382096096>; see also Liz Hoffman, *Morgan Stanley's Earnings Rise on Strength in Wealth Management*, WALL ST. J., Oct. 17, 2017 (describing the wealth management business as the “centerpiece of Mr. Gorman's effort to turn Morgan Stanley from Wall Street's problem child to a steadier firm prized by investors, largely by focusing on wealth and asset management.”), <https://www.wsj.com/articles/morgan-stanleys-earnings-rise-as-wealth-management-grows-1508238034>.

¹⁷ See *id.* (Morgan Stanley's pre-tax wealth management profits grew from 9% to 25% from 2010 to 2017, and Morgan Stanley's wealth management account balance exceeded \$1 trillion for the first time in 2017). Morgan Stanley has estimated that its pre-tax wealth income would exceed 57% as a result of the proposed acquisition.

¹⁸ See Telis Demos, *Morgan Stanley Raises the Bar*, WALL ST. J., Jan. 16, 2020 (stating that Morgan Stanley “believes it can add another million active clients in the future by extending its services to people who currently just touch the bank through corporate stock plans.”), <https://www.wsj.com/articles/morgan-stanley-raises-the-bar-11579198020>.

¹⁹ See Hoffman, *supra* note 14 (quoting Morgan Stanley CEO James Gorman that “We'll take on Schwab. We'll take on Fidelity.”).

²⁰ See Lucian A. Bebchuck & Scott Hirst, *The Specter of the Giant Three*, 99 BOSTON U. L. REV. 721 (2019).

²¹ See Demos, *supra* note 17.

use its brokerage services.²² These sorts of cross-selling practices should not be viewed solely as a benefit to customers, but there is ample evidence that cross-selling can also harm customers, including those of wealth management businesses.²³

Other harms: Morgan Stanley’s record of repeated legal violations that harm customers and investors, and investments that harm society show that it is already “too big to manage.”

According to the organization *Good Jobs First*, since the financial crisis of 2008, Morgan Stanley has been the subject of 41 different action by Federal, state, and private parties from abuses ranging from sales of toxic securities, to investor protection violations, to antitrust violations.²⁴ Since 2000, it has paid out almost \$10 billion in fines and penalties. In its most recent annual filing, Morgan Stanley reported four cases currently being litigated against the bank for securities violations.²⁵ This is not a financial institution that has demonstrated that it can effectively comply with the law at its current size – in short, it is “too big to manage”²⁶ – and it should therefore not be allowed to grow, risking more abuses and violations.

In addition, and notwithstanding its various corporate social responsibility statements, Morgan Stanley has provided nearly \$92 billion in financing to fossil fuel companies since the signing of the Paris Climate Accords, the eleventh most of any banking organization worldwide.²⁷ It has also owned and traded significant amounts of oil and gas assets over the years through its status as a financial holding company authorized to engage in nonfinancial activities.²⁸ Though it has

²² See Lisa Beilfuss, *Morgan Stanley Seeks to Manage More of Its Clients’ Wealth*, WALL ST. J., July 30, 2018 (“The firm will pay advisers an extra percentage point in compensation if they put those relatively small clients into a plan under which they can see the customer’s assets beyond what is held at Morgan Stanley. These plans are meant to accomplish certain financial goals for the client, and can help advisers bring in more of the client’s wealth that isn’t already held at the firm ... Advisers also will make more by getting clients to do their everyday banking at Morgan Stanley ... As part of its push to encourage more lending, the firm is near-doubling the reward for advisers who bring in more client debt.”), <https://www.wsj.com/articles/morgan-stanley-seeks-to-manage-more-of-its-clients-wealth-1532977551>.

²³ See, e.g., Emily Glazer, *Whistleblowers Detail Wells Fargo Wealth Management Woes*, WALL ST. J., July 27, 2018, <https://www.wsj.com/articles/whistleblowers-detail-wells-fargo-wealth-management-woes-1532707096>.

²⁴ See Good Jobs First, Violation Tracker, violationtracker.goodjobsfirst.org, accessed June 9, 2020.

²⁵ See Morgan Stanley, Inc., Dec. 2019 Form 10-K, at 125-26.

²⁶ See Jeremy C. Kress, *Solving Banking’s ‘Too Big to Manage’ Problem*, 104 MINN. L. REV. 171, 173 (2019) (a bank is too big to manage when “its size prevents executives, board members, and shareholders from effectively overseeing the firm, leading to excessive risk-taking and misconduct.”).

²⁷ See Rainforest Action Network, *Banking on Climate Change*, at 8 (2020), https://www.ran.org/wp-content/uploads/2020/03/Banking_on_Climate_Change_2020_vF.pdf.

²⁸ See generally PERMANENT SUBCOMM. ON INVESTIGATIONS, UNITED STATES SENATE, WALL STREET BANK INVOLVEMENT WITH PHYSICAL COMMODITIES 227-305 (Nov. 2014) (documenting that “Morgan Stanley once ran an empire of oil-related commodity activities, including trading, storing, transporting, and supplying oil products, including supplying jet fuel to airlines” as well as natural gas and crude oil), [https://www.hsgac.senate.gov/imo/media/doc/REPORT-Wall%20Street%20Bank%20Involvement%20With%20Physical%20Commodities%20\(12-5-14\).pdf](https://www.hsgac.senate.gov/imo/media/doc/REPORT-Wall%20Street%20Bank%20Involvement%20With%20Physical%20Commodities%20(12-5-14).pdf); see *id.*, at 230-31 (Morgan Stanley once owned physical commodity assets including the Heidmar Group, a marine transportation company; Wellbore Capital LLC, an oil and gas exploration company; Wentworth Holdings LLC, a shell company seeking to build natural gas compression facilities; and TransMontaigne Inc., which operated an oil storage and pipeline company).

scaled back some of these activities in recent years, it has also expanded them in other ways.²⁹ In addition to exacerbating the existential threat that is climate change, these activities have implications for financial risk and anticompetitive practices.

Conclusion: The Fed should reject this application.

In conclusion, the proposed acquisition would threaten financial stability by making a TBTF bank even bigger; increase the share of the wealth management industry controlled by such TBTF bank; and increase the size, scope, and scale of a Wall Street bank that already appears “too big to manage.”

Banking regulators have not denied a merger application in approximately 17 years.³⁰ We know that increased corporation concentration is related to economic inequality.³¹ Research is also beginning to show that inequality, financial stability and financial crises are related.³² In a moment when the Fed is being scrutinized for its role in exacerbating inequality in its response to COVID-19,³³ we urge you to begin reversing the troubling trend of banking consolidation by denying this application.

Sincerely,

American Economic Liberties Project

Cc: The Honorable Richard Clarida, Vice Chair, Board of Governors of the Federal Reserve System

The Honorable Randal Quarles, Vice Chair, Board of Governors of the Federal Reserve System

The Honorable Lael Brainard, Member, Board of Governors of the Federal Reserve System

The Honorable Michelle Bowman, Member, Board of Governors of the Federal Reserve System

²⁹ See Morgan Stanley, 2019 Form 10-K, *supra* note 24, at 93-94, 96 (reporting trading physical commodities including oil and gas, with a 256% growth in physical commodities assets from 2018 to 2019).

³⁰ See Kress, *supra* note 9, at 439.

³¹ See, e.g., David Autor et al, “Concentrating on the Fall of the Labor Share,” NBER Working Paper No. 23108 (Jan. 2017), <https://www.nber.org/papers/w23108>; see also Simcha Barkai, Declining Labor and Capital Shares (Nov. 19, 2019), J. OF FIN., *Forthcoming*. Available at SSRN: <https://ssrn.com/abstract=3489965>.

³² See Pascal Paul, “Historical Patterns of Inequality and Productivity around Financial Crises,” Federal Reserve Bank of San Francisco Working Paper 2017-23 (2020), <https://doi.org/10.24148/wp2017-23>.

³³ See Gene Ludwig & Sarah Bloom Raskin, *How the Fed’s Rescue Program Is Worsening Inequality*, POLITICO, May 28, 2020, <https://www.politico.com/news/agenda/2020/05/28/how-the-feds-rescue-program-is-worsening-inequality-287379>.

From: Chris Gillis
Sent: Thursday, June 4, 2020 9:39:15 PM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Subject: [External] MHP Comments on Proposed Merger of E*TRADE with Morgan Stanley

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Dear Mr. Hurwitz:

Please find attached a letter from Rob Goldman, president of the Montgomery Housing Partnership (MHP), regarding the proposed acquisition of E*TRADE by Morgan Stanley.

Thank you for your consideration of our views.

Best regards,
Chris Gillis

Chris Gillis | Director, Policy & Neighborhood Development
MHP
12200 Tech Road I Suite 250
Silver Spring, MD 20904
301.812.4139 | 301.622.2800 f |
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June 4, 2020

Federal Reserve Bank of New York
Ivan Hurwitz, Senior Vice President
33 Liberty Street
New York, NY 10045-0001

Dear Mr. Hurwitz:

On behalf of MHP, I am writing to comment on the proposed acquisition of E*TRADE by Morgan Stanley.

By way of background, MHP is a nonprofit affordable housing developer based in Silver Spring, Maryland, just outside of the nation's capital. Our mission is to preserve and expand quality affordable housing throughout the Washington metropolitan region, but we also seek to expand economic opportunity for low-income individuals. We take a comprehensive approach to housing that integrates three things: Housing People; Empowering Families; and Strengthening Neighborhoods. Through these three strategies, MHP has developed over 2,100 quality affordable homes, provided pre-school and after-school programming to more than 300 children annually, and worked collaboratively with residents to enhance the vitality of the neighborhoods where affordable housing is located.

Our partnership with E*TRADE has been incredibly important to our organization as it relates to both the production of affordable housing in the D.C. area, which suffers from some of the highest cost of living in the country, as well as our Community Life programs that provide early childhood enrichment.

Firstly, E*TRADE has generously provided general operating support to help MHP fulfill its mission. In addition to direct funding, almost \$700,000 over the years, they have provided in-kind support that has enabled us to expand our impact in underserved communities. For example, E*TRADE connected with us Tech Impact, an organization that specializes in assisting nonprofits realize the potential of technology to achieve their mission and improve outcomes. Tech Impact assisted us pro bono in selecting a new database for Community Life, which we struggled with before they became involved. Employees at E*TRADE have also given their time and energy to providing advice and feedback on our fundraising efforts and other work. Most recently, representatives of E*TRADE served on our capital campaign committee, which is aimed at doubling our affordable housing portfolio and creating an endowment to protect our Community Life programs from fluctuations in philanthropic and government funding. As you can see, E*TRADE has contributed in a myriad of ways in support of MHP and the residents we serve.

Beyond their charitable contributions to MHP, E*TRADE has been a leader in the corporate philanthropic ecosystem of the Washington DC area for many years. We would want to see any merged company continue to invest in the DC area at least at the same levels that E*TRADE has been doing in the last few years. To pull back on that commitment as the headquarters moves to New York would leave a serious gap in the DC region. Moreover, in light of COVID-19 and the severe impacts that it will have on the ability of nonprofits to fundraise

for the foreseeable future, partnerships with financial institutions like E*TRADE will be even more critical as we strive to make progress in affordable housing and expanding opportunities for our residents.

In closing, I hope you will take E*TRADE's philanthropic efforts into account when making a decision regarding the merger. We look forward to our partnership with E*TRADE continuing and growing if the proposed acquisition is approved. Thank you for the opportunity to share our experiences with E*TRADE and how they have given back to the community.

Sincerely,

A handwritten signature in black ink that reads "Robert Goldman". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Robert A. Goldman, ESQ.
President

From: Fikru Abebe
Sent: Monday, June 1, 2020 10:36:14 AM (UTC-05:00) Eastern Time (US & Canada)
To: NY Banksup Applications Comments
Subject: [External] Merger Comment Letter

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

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Dear Sirs,

Attached you find our comment regarding the Morgan Stanley and E*TRADE Merger. Please let me know if you need additional information.

Regards

Fikru Abebe

Managing Director

ECDC Enterprise Development Group

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June 1, 2020

Federal Reserve Bank of New York

Ivan Hurwitz, Senior Vice President

33 Liberty Street

New York, NY 10045-0001

Re: Morgan Stanley and E*TRADE Merger Comment

Dear Sirs,

Through a notice, Enterprise Development Group has been informed about the Morgan Stanley and E*TRADE Merger. Enterprise Development Group has worked in partnership with E*TRADE for almost close to a decade. During these years, E*TRADE has provided financial support making significant contributions in our communities. This has helped not only Enterprise Development Group achieve its mission, but improve the economic situation of low and moderate-income individuals in DC Metro area by helping them to increase their income and financial assets.

It is our strong belief that the merger will further enhance our existing partnership to be able to provide increased services to benefit the people with low and moderate-income level to a greater scale. With this merger, we look forward to continuing working with you while adding strength to our existing valuable partnership serving as a bridge toward self-sufficiency for individuals residing throughout the Washington, D.C. metropolitan area.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fikru Abebe', is written over the word 'Sincerely,'.

Fikru Abebe

Managing Director

ECDC Enterprise Development Group

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