

Eike, Kathy

From: Wright, Glorianna <gwrigh12@wildcat.fvsu.edu>
Sent: Monday, April 15, 2019 6:09 PM
To: BankMergerApplication@fdic.gov; RICH BankSup Applications Comments
Cc: gweng@homefreeusa.org
Subject: [External] HomeFree-USA

Follow Up Flag: Follow up
Flag Status: Flagged

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April 15, 2019

FDIC

Atlanta Regional Office

10 10th St., NW, Suite 800

Atlanta, GA 30309-3849

Federal Reserve Bank of Richmond

P.O. Box 27622

Richmond, VA 23261

To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement™ Historically Black College and University partner, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America.

I hereby support this merger and wish SunTrust greater success.

Regards,

Glorianna Wright

Fort Valley State University



April 15, 2019

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

To Whom It May Concern:

VirginiaNavigator is excited to offer its steadfast support to both SunTrust and BB&T around their merger efforts. Both organizations are extremely community-minded and have supported our non-profit organization and its work.

Created in 2001, VirginiaNavigator is a one-stop statewide public/private partnership 501c3 non-profit resource for long term services and supports. We have developed and maintained a database of over 27,000 programs and services for older adults, caregivers, individuals with disabilities and their families. VirginiaNavigator encompasses three Virginia-specific websites under one umbrella (VeteransNavigator.org, SeniorNavigator.org and disAbilityNavigator.org), and has a grassroots-based network of 747 Navigator Centers across the state.

SunTrust has a long history of supporting community non-profit organizations doing important work. We are no exception. SunTrust has provided us the opportunity to apply for and receive foundation grants on and off since 2002 that have supported our work with older adults and people with disabilities and caregivers and more recently, VeteransNavigator. Much of the support we've received was tied to SunTrust's core competencies of financial literacy and education. Though our partnership, we've been able to directly impact Virginians, especially the underserved, to ensure they have the tools they so desperately need to build a better financial future for themselves and their families.

BB&T supported our 10th Anniversary celebration in 2011, which was a commemoration of a decade of our work in communities across the state and honored the storied legacy of our former board chairman, the late Mr. James C. Roberts.

Together, we believe that SunTrust and BB&T will be able to make an even greater and more meaningful impact across all of the communities they serve, including across our home state of Virginia. Thank you for giving their merger application your favorable consideration. Should you have questions, don't hesitate to contact me at (804) 525-7735 or Adrienne@VirginiaNavigator.org.

Sincerely,

Adrienne M. Johnson
Executive Director
VirginiaNavigator

John H. Hager, Chair
Former Lieutenant Governor
Commonwealth of Virginia

Deborah D. Oswalt, Co-Chair
Executive Director
Virginia Health Care Foundation

Jennifer B. Aulgur
Legislative Assistant
Virginia State Senator Mark Obenshain

Richard L. Grier
Director
ThompsonMcMullan

James Harenchar
President and CEO
Response Marketing Group

Seth Levy
Chief Information Officer, Retired
Various Retailers

Richard W. Lindsay, M.D.
Geriatrician and Professor
Department of Internal Medicine
University of Virginia

F. Michael Martin
Health Care Executive, Retired
Various Health Systems

Fran Palma
Senior Vice President, Digital Strategies
Covenant Retirement Communities

Katie M. Roeper
Assistant Commissioner, Retired
Virginia Department of Aging and
Rehabilitative Services





**HOUSING OPTIONS
& PLANNING
ENTERPRISES, INC.**

April 15, 2019

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

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

To Whom It May Concern,

As a nonprofit partner of HomeFree-USA, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America.

I hereby support this merger and wish SunTrust greater success.

Regards,

Donna Hurley
CEO/Executive Director
Housing Options & Planning Enterprises, Inc.

Eike, Kathy

From: Catherine Steck McManus <CMcManus@habitorlandoosceola.org>
Sent: Tuesday, April 16, 2019 8:51 AM
To: RICH BankSup Applications Comments
Subject: [External] Letter of Support BB&T and SunTrust

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To Whom it May Concern:

I write today on behalf of Habitat for Humanity Greater Orlando & Osceola County. I wish to commend the thoughtful and engaging work that SunTrust is doing in Central Florida. Their commitment to our mission is strong and the local team is always available for advice and encouragement. In addition, SunTrust is a generous financial supporter of our work and advocate of our financial training we do with our low-income clients.

I support the merger and think Central Florida will be the better for it.

Sincerely,
Catherine

Catherine Steck McManus

President and CEO
Habitat for Humanity Greater Orlando & Osceola County
4116 Silver Star Rd, Orlando FL 32808
office: (407) 440-6976 • cell: (407) 739-8334
cmcmanus@habitorlandoosceola.org • habitorlandoosceola.org

Eike, Kathy

From: Angel Whaley <angel@pepgc.org>
Sent: Tuesday, April 16, 2019 9:48 AM
To: RICH BankSup Applications Comments
Subject: [External] Merger Comments

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To Whom It May Concern,

Public Education Partners' mission is to lead our community in acting collectively to support, strengthen, and advance public education and student achievement in Greenville County Schools. As a 'local education fund' Public Education Partners (PEP) generates support from individuals, corporations and foundations to fund the initiatives that will have the greatest impact on improving the quality of public education for nearly 77,000 students and 5,300 teachers in 101 schools and centers.

Through its support of our Make Summer Count literacy program, David Torris and the SunTrust Foundation are helping us ensure elementary students attending 29 high-need schools have access to high-interest, age-appropriate books that they love. All 29 elementary schools participating in Make Summer Count have poverty rates of 50% or more according to free and reduced meal rates. SunTrust's generosity strengthens the reading gains of more than 18,300 Make Summer Count students in the Upstate. Because of SunTrust's support, each spring, students are building their very own home libraries and their families are equipped with strategies to improve literacy practices in their home year-round. In partnership with SunTrust Bank and the SunTrust Foundation, we are not only changing students' attitudes and beliefs about the importance of summer reading, but also impacting their school performance, and ultimately their ability to return to school in the fall, ready to learn. The Board and staff at Public Education Partners in Greenville County South Carolina support the merging of two iconic franchises and look forward to continuing to partner to improve public education and student achievement in the Upstate.

My Best,
Angel Whaley
Vice President of Advancement
Public Education Partners
864.233.4133



Public Education Partners' mission is to lead our community in acting collectively to support, strengthen, and advance public education and student achievement in Greenville County Schools.
SUPPORT OUR MISSION

Eike, Kathy

From: Kathryn Dennis <kdennis@cfcga.org>
Sent: Tuesday, April 16, 2019 10:50 AM
To: RICH BankSup Applications Comments
Subject: [External] SunTrust Bank, Middle Georgia

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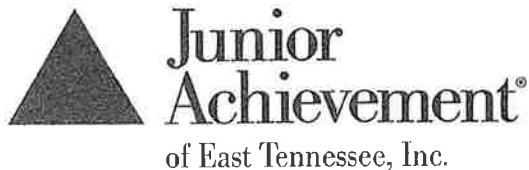
SunTrust Bank, Middle Georgia and its employees have been vital to the success of our community for almost 100 years. SunTrust supports community organizations and events financially and by allowing its employees to serve in leadership positions. Recently, I learned through Patricia Ballard, a ST officer, of a new organization that provides affordable housing for veterans who were previously homeless. Ms. Ballard was working with this group's leadership to ensure its sustainability and connected them to the Community Foundation. There are countless more examples of the bank and its employees' community leadership making a difference here in Middle Georgia.

I believe that the bank's leadership will continue, and be even stronger, after its merger with BB&T. Please call on me for additional information.

Kathryn Dennis

Kathryn H. Dennis | President | Community Foundation of Central Georgia
577 Mulberry Street, Suite 1600, Macon, GA 31201
phone: (478) 750-9338 | fax: (478) 738-9214 | www.cfcga.org





2135 North Charles G. Seivers Blvd.
Clinton, Tennessee 37716
865.457.2461 • 865.457.9884 fax
jaeasttennessee.org

April 16, 2019

To Whom It May Concern:

SunTrust and BB&T have both been longstanding partners in financial literacy education with Junior Achievement of East Tennessee. It is rare find to have not only the corporate financial support but also the volunteer spirit - people from the team who really want to be hands-on in making a difference in their communities. We see this merger as an opportunity for continued and expansion of these partnerships.

Over the years there have been many reasons to celebrate their involvement with our organization – financial institutions like these two are the backbone of what we are able to accomplish as an organization. These institutions are two of the reasons that we were able to grow our student reach by 16% last year alone. Their commitment to helping others gain financial confidence is steadfast and the volunteers who have participated in these efforts have always gone above & beyond. A merger of these two financial forces will spur increased community engagement and impact.

Over the years the SunTrust Foundation has been significant supporting our JA Finance Park Virtual experience. This curriculum is designed for middle and high school students to learn about personal finance and explore career paths. The program will serve over 1,300 students this year in East Tennessee, helping them prepare more fully for college, careers, and the demands of tomorrow's economy, guiding them along a path toward financial confidence. Time & time again the conversations that we have with the SunTrust Foundation and the SunTrust Volunteers show us that they are all-in when it comes to helping our young people growing up in low- and moderate income homes become financially confident adults. This program gives middle and high school students the skills they need to fill and create the careers of tomorrow. The experience will begin with a month-long, in-class economics program during which students learn personal financial planning and examine pathways to various careers. They then login to JA Finance Park Virtual, where each student is assigned a "life situation" that includes their career, income and family composition. In this virtual simulation, they will make real-life decisions such as buying a car, negotiating a mortgage, paying monthly expenses, investing in their own education and more.

SunTrust and BB&T have also both been longstanding partners with our JA BizTown program at The Hollingsworth Center for Entrepreneurial Leadership where 5th grade students from 19 different school systems, many of which are on Free & Reduced Lunch, attend a day-long simulation where they can hone their financial management skills and explore regional careers. Learning about finances with financial experts on hand is one of the most valuable experiences that these young people can have. The community volunteers and the day-long simulation help provide more than 9,000 students annually with a foundation in personal budgeting, career readiness and real-life adult responsibilities.

We support this merger whole-heartedly and look forward to the completion of this merger. Junior Achievement of East Tennessee looks forward to the day when we will be working with a unified entity in making significant positive community & economic impact continue to happen here for our young people in East Tennessee.

If you have further questions about their involvement please do not hesitate to reach out to me.

Sincerely,

A handwritten signature in cursive script that reads "Callie Archer".

Callie Archer
President

Eike, Kathy

From: Mullins, Daniel <Daniel.Mullins@rx.umaryland.edu>
Sent: Tuesday, April 16, 2019 1:02 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Subject: [External] I support the BB&T – SunTrust merger

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PLEASE NOTE: This email is not from a Federal Reserve address.
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To whom it may concern at the Federal Reserve Bank of Richmond and the Federal Deposit Insurance Corp.:

I wholeheartedly support the BB&T – SunTrust merger. I have my checking account with Bank of America and would like to see more options and competition in the national arena for those who want a “local” bank with a national presence for ATMS.

I am familiar with both institutions and had my mortgage with SunTrust until it was sold to another mortgage company. I view this merger as good for competition and the economy. I also am familiar with the commitment that BB&T and SunTrust have to the community and to community-oriented institutions. The impact of the merger will provide even greater incentives for community investments right here in Maryland and in other communities that BB&T and SunTrust serve.

As a researcher who does community-engaged research in some of the poorest neighborhoods in Baltimore, I have witnessed first-hand how SunTrust and BB&T help us to contribute to economic development of at-risk communities in Baltimore and Washington, DC. This merger will further enhance investments in programs that help people with limited income move toward financial freedom and financial well-being.

I look forward to the positive impact that the merger of BB&T and SunTrust will have for enriching the communities that we serve in Maryland.

C. Daniel Mullins, PhD
Professor and Chair
PHSR Department
University of Maryland School of Pharmacy
220 Arch Street, 12th Floor
Baltimore, MD 21201
Phone: 410-706-0879
Email: daniel.mullins@rx.umaryland.edu
Website: <http://faculty.rx.umaryland.edu/dmullins/>

Please visit The PATIENTS Program’s website, follow us on Facebook, and subscribe to our YouTube channel.

The PATIENTS Program

at the University of Maryland
School of Pharmacy

<http://patients.umaryland.edu>

Eike, Kathy

From: John Busse <jbusse@crstoreybalt.org>
Sent: Tuesday, April 16, 2019 1:02 PM
To: BankMergerApplication@fdic.gov; RICH BankSup Applications Comments
Cc: Horton.Natasha
Subject: [External] SunTrust / BB&T Letter of Support - Cristo Rey Jesuit High School

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To: Federal Reserve Bank of Richmond and Federal Deposit Insurance Corporation (Atlanta Region)

I am writing today on behalf of Cristo Rey Jesuit High School to offer support for the proposed SunTrust / BB&T merger.

Cristo Rey directly serves economically disadvantaged Baltimore City youth through a model of earned success. Our unique four-year integrated work/study program not only provides access and opportunity to motivated students from distressed neighborhoods it allows those very same students to offset a large percentage of their education cost. Since opening our doors in 2007, 100% of our graduates have been accepted into college. SunTrust is a committed partner in this mission.

SunTrust believes in the communities it serves and, through Cristo Rey and other like-minded, mission-driven organizations, invests directly in improving the quality of life for those most in need.

Through this merger, the combined entity will magnify the current contributions to economic development, job creation, and access to quality education in the neighborhoods that we serve. We support the merger on behalf of a better future Baltimore.

Best,

John Busse

--
John Busse
Director : Corporate Internship Program
M) 443-824-8235
O) 410-727-3255 x1010
Cristo Rey Jesuit High School
420 South Chester Street
Baltimore, MD 21231



April 16, 2019

To: Federal Reserve Bank of Richmond and the Federal Deposit Insurance Corp.

On behalf of the Entrepreneurial Development & Assistance Center at Morgan State University, I would like to offer my support of the BB&T-SunTrust merger. The combination of these two community oriented organizations will continue to add value to initiatives that we have in and around Morgan State University.

In the past, we have received support (financial and volunteers) from both organizations during our annual youth entrepreneurship conference, workshops for community based entrepreneurs and specialized workshops for women, veterans and millennials. We welcome the continued presence from the combination of the two institutions.

I enthusiastically support the merger of BB&T-SunTrust as an organization that will help uplift the communities in Maryland, specifically those in and around Morgan State University and the state of Maryland.

Sincerely,

A handwritten signature in black ink, appearing to read 'Omar S. Muhammad'.

Omar S. Muhammad
Director

April 16, 2019

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

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

To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement™ Historically Black College and University partner, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America.

I hereby support this merger and wish SunTrust greater success.

Regards,
Lauren Wartley



DRESS FOR SUCCESS[®]
HAMPTON ROADS

4000 Colley Ave., Suite 200, Norfolk, VA 23508 Tel 757.961.7148 / Fax 757.961.3475
hamptonroads@dressforsuccess.org

Going Places. Going Strong.

April 15, 2019

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

Dear Federal Reserve Bank of Richmond,

I am writing this letter to express my sincere thanks to SunTrust Bank and Foundation for its support of Dress for Success Hampton Roads over the past several years. We are proud to collaborate with SunTrust and are grateful for the bank's continued commitment to our mission and the quality of life for all who live, work, play and do business in the Hampton Roads region and beyond.

We recently learned that SunTrust has filed a merger application to the Federal Reserve Bank of Richmond and to the FDIC's Atlanta Regional office. Dress for Success Hampton Roads supports the merger of SunTrust and BB&T. We are confident this proposed merger will strengthen the Bank's position to partner in many communities.

For several years, SunTrust has served many underrepresented communities and enabled DFS Hampton Roads to continue our mission to empower women to achieve economic independence by providing a network of support, professional attire and the development tools to help women thrive in work and in life. SunTrust Bank recognizes and understands the unique challenges of economically distressed communities and individuals caught in the cycle of generational poverty.

With an established history of working with at-risk women, DFS Hampton Roads knows that economic insecurity is exacerbated by factors like child abuse and neglect, domestic and sexual violence, substance abuse, incarceration, homelessness, and mental health illness. SunTrust's continued support of our efforts allows us to interrupt this cycle by funding our Career Center and Career Development and Employment Programs that are designed to provide unemployed and underemployed women assistance in gaining professional skills to accelerate their job search and build confidence through weekly training sessions, one-on-one career coaching and networking in a supportive environment. Expert speakers, resume/cover letter enhancements, and mock interviews prepares the participants to become work-ready to move to employment.

Dress for Success Hampton Roads enthusiastically supports SunTrust's merger application with BB&T!

Respectfully,

Debra M. Dandridge
Executive Director/Co-founder

cc: Mark A. Johnson
V.P. Community Development
Hampton Roads


"Celebrating 13 Years of Service to Women in Hampton Roads"

TO WHOM IT MAY CONCERN:

I have been a longtime, devoted customer of Sun Trust and heartily support their ~~new~~ proposed merger with BB&T.

Sincerely,
Anthony F. Maxwell

Home address



Eike, Kathy

From: Matt Pieper <mpieper@projectopenhand.org>
Sent: Tuesday, April 16, 2019 1:45 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov.
Subject: [External] SunTrust and BB&T Merger

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To Whom It May Concern:

I am writing to voice my support for the merger of two community-minded institutions: SunTrust and BB&T. I am the executive director for Open Hand Atlanta, Inc., a nonprofit organization that cooks, packages and delivers healthy meals to people in need throughout metro-Atlanta. For more than a decade, SunTrust has been our loyal partner, often sending hundreds of employees to volunteer annually in our kitchen and also supporting our mission with charitable grant awards. I can't do justice to how "giving back to the community" is a strong part of the culture at SunTrust. Their executives are always available to provide worthy nonprofits with advice and expertise. SunTrust sets a shining example for what it means to be a caring corporate citizen. My understanding of BB&T is that their leadership and employees also have a culture of giving back. Together, these companies can join resources and make an even greater impact in the metro-Atlanta community and in all the cities where they will do business.

This pending merger will be good for our community and economy. I fully support it and hope that the Federal Reserve will look favorably on this venture.

Sincerely,
Matthew Pieper

Matthew Pieper
Executive Director



181 Armour Drive NE | Atlanta GA 30324

T. 404.419.3309
C. 404.375.1089
EA. 404.419.1130

mpieper@openhandatlanta.org
www.OpenHandAtlanta.org

**OPEN
HAND**

Open Hand helps people prevent or better manage chronic disease through Comprehensive Nutrition Care, which combines home-delivered meals and nutrition education as a means to reinforce the connection between informed food choices and improved quality of life.

Eike, Kathy

From: Kelley, Tia-Shon <TKelley@bcps.k12.md.us>
Sent: Tuesday, April 16, 2019 3:52 PM
To: RICH BankSup Applications Comments
Subject: [External] BBT - SunTrust Merger Support

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To: Federal Reserve Bank of Richmond and the Federal Deposit Insurance Corp.

To whom it may concern,

On behalf of Green Street Academy, I would like to offer our support of the BB&T – SunTrust merger. By merging, the impact of their community investments will only create more opportunities right here in Baltimore but also throughout the State of Maryland. My community partner from SunTrust NaTasha Horton is not only committed to my organization but so many others. The financial education and career coaching she provides to the community is outstanding and I know this will continue with the new entity.

SunTrust has helped to provide funding and resources to the at- risk youth in the communities of Baltimore which helps improve the lives of the young folks we serve daily. This merger will hopefully expand resources to invest in programs like SBLC and other crucial initiatives that our communities need.

We fully support the merger of BB&T-SunTrust for the betterment of the communities that we serve in Maryland. We look forward to continuing to partner with this wonderful community supporter / bank in the future.

Warmly

Tia-Shon Kelley

Director Internships & Student Enrichment

443-642-5459

Tkelley@bcps.k12.md.us

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Eike, Kathy

From: Tiashon Kelley <info@theysn.org>
Sent: Tuesday, April 16, 2019 5:37 PM
To: RICH BankSup Applications Comments
Subject: [External] Merger Support - BBT- SunTrust

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To: Federal Reserve Bank of Richmond and the Federal Deposit Insurance Corp.

To whom it may concern,

On behalf of Youth Solutions Network, I would like to offer our support of the BB&T – SunTrust merger. By merging, the impact of their community investments will only create more opportunities right here in Baltimore but also throughout the State of Maryland. My community partner from SunTrust NaTasha Horton is not only committed to my organization but so many others. The financial education and career coaching she provides to the community is outstanding and I know this will continue with the new entity.

SunTrust has helped to provide funding and resources to the at- risk youth in the communities of Baltimore which helps improve the lives of the young folks we serve daily. This merger will hopefully expand resources to invest in programs like SBLC and other crucial initiatives that our communities need.

We fully support the merger of BB&T-SunTrust for the betterment of the communities that we serve in Maryland. We look forward to continuing to partner with this wonderful community supporter / bank in the future.

Warmly

Tia-Shon Kelley
COO
www.theysn.org
443-308-8168

Eike, Kathy

From: Eve White <eve.white@artsandscience.org>
Sent: Tuesday, April 16, 2019 4:08 PM
To: RICH BankSup Applications Comments
Subject: [External] SunTrust and BB&T merger | Committed to community

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To Whom It May Concern:

It has been my privilege to work closely with leaders and team members at SunTrust Bank and BB&T in the Charlotte area and see the impact these banks have made in the arts and sciences by supporting cultural diversity, access and Culture for All.

SunTrust is fully invested in our community, sponsoring cultural events and engaging employees in workplace giving campaigns to the Arts & Science Council (ASC). Each year, SunTrust colleagues come together to raise thousands of dollars for ASC, using music trivia fundraisers and lunch-n-learn events to help build a better community through the arts.

Both BB&T and SunTrust leaders also commit their time to serving on volunteer committees and advisory councils for the ASC, and offering their expertise and time on boards for [the many cultural partners](#) we support.

Combined, SunTrust and BB&T will emerge as a united organization that cares for community, and able to make an even bigger contribution. I believe the two banks coming together will make a positive impact on us all in Charlotte. Thank you for allowing me to voice my support for this merger.

With gratitude,

Eve White | Senior Director of Corporate Relations

ASC. Culture For All.

227 West Trade St., Ste. 250, Charlotte, NC 28202

704.335.3042 | 704.560.4611 m

eve.white@artsandscience.org

ArtsAndScience.org | CharlotteCultureGuide.com

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Via Email: comments.applications@rich.frb.org

Via Email: BankMergerApplication@fdic.gov

Via Email: Natasha.Horton@suntrust.com

April 16, 2019

Federal Reserve Bank of Richmond and
Federal Deposit Insurance Corporation (Atlanta Region)

To whom it may concern:

I am writing today on behalf of the U.S. Dream Academy Inc. to offer support for the proposed SunTrust / BB&T merger.

The U.S. Dream Academy delivers mentoring and academic support to 125 underserved youth at our Dream Academy Learning Center at Pimlico Elementary School, Baltimore City, MD. Our program provides an environment where skills, character, and dreams are nurtured and developed. Students in the Dream Academy's afterschool program achieve better in math, reading and other subjects; have fewer behavioral problems, and have better attendance records. Also, the program offers youth a safe place where they can learn during the peak hours that juveniles are typically victims of crime or engage in criminal activity themselves. The program brings together various community members and gets them actively involved in helping kids learn and grow. Through our partnership with SunTrust, we have engaged in financial literacy and other activities to improve life among our young people.

SunTrust believes in the communities it serves and, through the U.S Dream Academy and other like-minded, mission-driven organizations, invests directly in improving the quality of life for those most in need.

We hope that through this merger; the combined entity will magnify the current contributions to economic development, job creation, and access to quality education in the neighborhoods that we serve. We support the merger on behalf of a better future for the young people of Baltimore.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Diane Wallace Booker'.

C. Diane Wallace Booker

Executive Director

Eike, Kathy

From: Trent, Crystal <ctrent@northstaracademy.net>
Sent: Tuesday, April 16, 2019 5:11 PM
To: RICH BankSup Applications Comments
Subject: [External] Suntrust Bank Merger

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

Good afternoon,

It is with pleasure I write on behalf of Suntrust Bank and the support of time, talent and treasure they provide to Northstar Academy, a non-profit private school for students with disabilities in grades K-12 and technical school. At Northstar, we don't classify successes by "big" or "small". We just celebrate success. The same is true for the support provided by Suntrust. While some may choose to classify the financial support provided by the Foundation or the support of our annual Gala as more important because that support involves money, I would argue the community outreach support that's been provided is equally important to our mission. Suntrust provides Financial Literacy classes to our students at our Career Academy. Further, they work with our teachers to adapt the curriculum so it's appropriate for the abilities of the students they are working with at the time. Consequently, this means they may adapt the curriculum again in subsequent years because the needs of the students can change yearly.

Additionally, Suntrust works closely with our Art teacher to celebrate the incredible work our students create. For Disability Awareness month, Donna Heath organizes an Art Show & Reception at their Downtown office. During this show, student creations along with other differently-abled individuals from the community are given the spotlight for an evening where they get to show off their work to family and friends. But knowing their work is on display for the entire month, gives our students a boost of confidence that cannot be created in the classroom. Suntrust also allows student art work to be displayed at other times of the year celebrating our students other than a designated month.

Finally, Phillip Avant has been a huge supporter of Northstar Academy as a member of our Board of Directors. His expertise and passion for our mission has helped further many initiatives in our school. It's clear he genuinely wants to help Northstar; not just check a box. This ultimately leads to better services for students with disabilities.

It is without hesitation I offer this support of Suntrust!

--

Thank you,
Crystal Trent
Head of School
ctrent@northstaracademy.net
(804) 747-1003 phone

(

April 16, 2019

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

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

To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement™ Historically Black College and University partner, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America.

I hereby support this merger and wish SunTrust greater success.

Regards,

Li'yonna Battle,

Fort Valley State University



April 16, 2019

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

Federal Deposit Insurance Corporation
Atlanta Regional Office
10 10th Street, NW, Suite 800
Atlanta, GA 30309-3849

RE: Proposed Merger of BB&T, SunTrust

To Whom it May Concern:

I have been asked to provide comments regarding the proposed merger of BB&T and SunTrust, and in particular, our experience with BB&T as it relates to the bank's record of support for community development projects.

Centrant Community Capital is a wholly-owned subsidiary of the North Carolina Bankers Association, created in 1990 to offer permanent mortgage loans to finance affordable multifamily housing. To date, we have provided over \$400 million in funding commitments to finance 23,000 units in six Southeastern states. As a lending consortium, all of the funding for our loans is provided by a network of nearly 100 member banks via voluntary, loan-by-loan participation commitments.

Since joining our consortium in 1993, BB&T has been one of Centrant's most consistent and supportive members. In total, BB&T has provided over \$37 million in funding for our loans, helping to finance the creation or preservation of thousands of affordable apartment units in over 230 properties across our lending footprint. I am pleased to report that BB&T also supports these developments via tax credit equity investments, and as a construction lender.

Without the support of financial institutions such as BB&T, it would not be possible for Centrant to provide the financing that we offer. We appreciate BB&T's long-standing support of our organization, and applaud its demonstrated commitment to community development efforts in the markets that we serve together.

Sincerely,

A handwritten signature in black ink that reads "David R. Bennett".

David R. Bennett
Executive Vice President



April 16, 2019

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

Dear Sir/Madam:

Thank you for the opportunity to share information about the partnership between the ACCESS College Foundation and SunTrust Bank/SunTrust Foundation. ACCESS has been able to provide many opportunities for postsecondary training and education beyond high school for local students in the South Hampton Roads and Eastern Shore areas of Virginia through the strong partnership we have with SunTrust.

Our partnership with SunTrust has been active for nearly 24 of the 31 years the ACCESS College Foundation has been in existence. During that time, ACCESS has helped 60,000 students, many of whom are low-income and the first in their family to go to college, to complete certifications or degrees to allow them to become productive citizens of our region. Nearly 70% of our students return to our region to live and work after completing their certifications and degrees.

SunTrust has such a great reputation for being involved in the communities it serves. In mid-2012, Mark Johnson, SunTrust Vice-President and Community Development Manager for Hampton Roads, Virginia, was elected to the ACCESS College Foundation Board of Directors. Since 2013 SunTrust, through Mark Johnson and Charity Volman, our Market President, has had a remarkable impact on our funding and the services we have been able to improve. Mr. Johnson had an active role in our *College Changes Everything* campaign to increase college access services to students attending public middle and high schools in Norfolk, Portsmouth, Chesapeake, Virginia Beach and Suffolk, Virginia. During that time, we also expanded geographically to Northampton County on the Eastern Shore of Virginia.

Mark Johnson is the Community Development Manager in every sense of the word "community" and his shared attitude, interest, and goals for the betterment of our region. He and SunTrust have not only facilitated funding for ACCESS, but also helped

Federal Reserve Bank of Richmond
Page 2
April 16, 2019

us make numerous connections with other community funders and other community nonprofit organizations. His knowledge of this community and his passion for youth and education have made him crucial to so many organizations, including the ACCESS College Foundation.

SunTrust's commitment to education has afforded many opportunities for our students' success. SunTrust has become a major funding partner of the ACCESS College Foundation. Their financial commitment to ACCESS exceeds the annual support funding we receive from other banking and financial institutions and has been and currently is very important to the services we are able to provide.

In addition to annual support that funds all areas of our program, SunTrust specifically partners with us for certain special opportunities such as: 1. providing one scholarship per school for our 17 schools with a majority low-income population; 2. partnering in special parent events to bring awareness of the possibility of education and training beyond high school to middle school students and their parents; and 3. partnering in the community-wide celebration College Commitment Day, where more than 2,200 graduating seniors commemorate their acceptance to college. While this year's College Commitment Day event is coming up on April 30, 2019, you may view the excitement of the 2018 event at the following link:

<https://www.youtube.com/watch?v=EwGLVa4o1E?>

We are anticipating that the merger between SunTrust and BB&T will increase its outreach and support in the cities and counties that both banks currently serve, such as those we serve in Norfolk, Portsmouth, Chesapeake, Virginia Beach, Suffolk and Northampton County, Virginia. Support from the powerful institution that will be created by this bank merger will be transformational for areas like Hampton Roads, the Eastern Shore, and western Tidewater with urban, suburban and rural geography and populations.

Please feel free to review additional information about the ACCESS College Foundation and our programs at www.accesscollege.org. You may also contact me directly at bsutton@accesscollege.org or at 757.962.7285.

Sincerely,



Bonnie B. Sutton
President and CEO

Eike, Kathy

From: Sellinger, Sr., James <Jim.Sellinger@archbalt.org>
Sent: Tuesday, April 16, 2019 5:47 PM
To: RICH BankSup Applications Comments; bankmergerapplication@fdic.gov
Subject: [External] SunTrust - BB&T Merger Support

NONCONFIDENTIAL // EXTERNAL

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

To Whom it May Concern,

I write to voice my support for the proposed BB&T – SunTrust merger.

As the former IBM Senior State Executive for the State of Maryland and now as the Chancellor of Education for the Archdiocese of Baltimore, I have and continue to personally witness and value the commitment both SunTrust and BB&T have made to our Baltimore community.

In addition to providing financial support that contributes to the sustainability and growth of the City of Baltimore, their employees have volunteered and mentored the youth of our community and lent their expertise to strengthen the businesses and non-profit organizations in Maryland.

Both SunTrust and BB&T epitomize the definition of corporate social responsibility. As a combined entity, I look forward to their continued support in assisting us with the development of our students to become the future leaders of our community.

Sincerely,

Jim Sellinger

*James B. Sellinger, Sr.
Former IBM Executive
Chancellor of Education
Archdiocese of Baltimore
(410) 547-5331*

Eike, Kathy

From: Hughley, Aliah <ahughle3@wildcat.fvsu.edu>
Sent: Tuesday, April 16, 2019 6:49 PM
To: BankMergerApplication@fdic.gov; RICH BankSup Applications Comments
Cc: gweng@homefreeusa.org
Subject: [External] SunTrust and BB&T merger

NONCONFIDENTIAL // EXTERNAL

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April 16, 2019

FDIC

Atlanta Regional Office

10 10th St., NW, Suite 800

Atlanta, GA 30309-3849

Federal Reserve Bank of Richmond

P.O. Box 27622

Richmond, VA 23261

As a Agricultural Economics Major and University partner, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America.

I hereby support this merger and wish SunTrust greater success.

Regards,

Aliah Hughley

Get [Outlook for iOS](#)



Hampton Roads and Central Virginia

April 17, 2019

To whom it may concern:

On behalf of the USO of Hampton Roads and Central staff and Board of Directors, I am writing to express our support for SunTrust Banks and its announced merger with BB&T. Our local USO is a loyal SunTrust customer and I personally have my mortgages through BB&T; both institutions are top shelf and through this merger we believe the best of both institutions will be realized.

Both SunTrust and BB&T have been loyal supporters to the men and women who wear the cloth of our nation through their support of the USO of Hampton Roads and Central Virginia. We are the third-largest military community in America, and we believe that this merger will create a stronger, more resilient institution that will continue to serve our community through thoughtful philanthropy and the delivery of the highest quality financial products and services.

SunTrust Banks is a supporter in the delivery of the USO's mission which is keeping service members connected to family, home and country throughout their service to the nation. We look forward to continuing our successful partnership with the newly merged SunTrust/BB&T financial institution.

With kind regards, I am

Most sincerely,

A handwritten signature in blue ink, which appears to read "Paula G. Moran". The signature is fluid and cursive, with a large loop at the end.

Paula G. Moran, J.D.
President and CEO

P.O. Box 8097 | Norfolk, VA 23503 | (757) 337-4447 | hrcv.uso.org

The USO strengthens America's military service members by keeping them connected to family, home and country, throughout their service to the nation





April 15, 2019

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

RE: Support of SunTrust and BB&T Merger

To Whom It May Concern:

Please accept our comments pertaining to the merger of SunTrust and BB&T.

The relationship between SunTrust and the Columbus Housing Initiative, Inc., d/b/a NeighborWorks Columbus, begins before our actual creation. Then SunTrust President, Frank Etheridge served on the original advisory council, in 1997, which led to who we are today. He recognized the importance of having a non-profit community development organization that embraced his vision, which became our vision, of "*the elimination of substandard housing*".

It was this original advisory council, led by Frank Etheridge and embraced by all at SunTrust, which determined it was critical that there be a consortium line of credit for the organization. It was SunTrust that led the way in making it possible by agreeing to manage the participatory capital with six other banks. SunTrust continue to manage this access to capital for almost ten years, leading to over one hundred homes being built and the revitalization of one of our historic neighborhoods, East Wynnton Park.

When our community began to talk about the possibility of applying for a HOPE VI project to eliminate the aging Peabody Apartment, SunTrust stepped in and made it possible for Columbus to not only make homeownership a part of the HOPEVI application, but facilitated the access to the capital to turn the promised 28 units into 33 homes that were purchased.

From the beginning, and every year since, SunTrust has continued to be one of our strongest private industry financial partners, providing technical assistance, leadership, strategic positioning, flexible capital and programmatic grants.

These are just a few highlights that show not only the commitment SunTrust has to the City of Columbus but to NeighborWorks® Columbus as well. With our long history and our vision for the future, the residents of our community are poised to benefit from this merger.

If I can provide any additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Cathy Williams". The signature is written in a cursive, flowing style.

**Cathy Williams
President/CEO**

cc: FDIC – Atlanta Regional Office

Eike, Kathy

From: Matt Ryerson <mattryerson@unitedwayocoe.org>
Sent: Wednesday, April 17, 2019 11:34 AM
To: RICH BankSup Applications Comments
Subject: [External] Merger comments

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To Whom It May Concern;

We, at the United Way of the Ocoee Region, have been pleased to partner with both SunTrust and BB&T over many years working on the core issues challenging our community. Both organizations have effectively partnered and invested in financial stability programming, stable housing issues, and early childhood initiatives. Both organizations also have a rich history of volunteerism and leadership within our community based nonprofit. We believe this merger will lead to only more support and look forward to further partnership in the future.

Thank you!
Matt

Matt Ryerson | President & CEO

United Way of the Ocoee Region

85 Ocoee St. SE, Cleveland, TN 37311 | O: [423.479.2020](tel:423.479.2020)

United Way fights for the health, education and financial stability of every person in every community. LIVE UNITED®

www.unitedwayocoe.org | Find us on: [Facebook](#) | [Twitter](#) | [Instagram](#)



Kevin Greiner, President & CEO
Gas South, LLC
3625 Cumberland Blvd., Suite 1500
Atlanta, GA 30339

April 16, 2019

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

To whom it may concern:

I am writing in my capacity as President and CEO of Gas South, LLC, an Atlanta-based natural gas provider that serves over 300,000 residential, commercial, and industrial customers in competitive retail markets in Georgia, Florida, North Carolina, and South Carolina and has annual revenues of approximately \$350 million. SunTrust currently serves as our lead bank for our \$80 million revolving credit facility and shares the lending responsibilities with two other banks. We have had a past relationship with BB&T as well, though we are not presently a client of that bank. I also have the privilege of serving on the boards of several non-profit organizations with executives from both SunTrust and BB&T.

We have no significant concerns with the proposed merger of SunTrust and BB&T and do not believe that the merger would negatively impact our ability to access financing. Furthermore, in my experience, SunTrust and BB&T are both purpose-driven companies as demonstrated by the deep institutional commitment to philanthropy and community investment as well as the volunteerism and generosity of their respective employees. As a similarly community-minded executive, I was pleased to learn that corporate citizenship will continue to be a core strategy of the merged entity.

In our experience, the interest among banks for our business is very strong and the financial services marketplace in Atlanta is highly competitive. We currently have three banks, including SunTrust, in our bank group. We do not believe that this merger of equals would create challenges for Gas South to access the capital and financial services we require to continue to grow our business. From a client perspective, we are in support of the transaction as we believe the merged entity has the potential for offering an even more comprehensive set of capabilities to us, while also having many other financial services providers that will remain interested in our business.

Please feel free to contact me for any additional input or information you may desire. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Greiner".

Kevin Greiner
President and CEO

April 17, 2019



Federal Reserve Bank of Richmond
P. O. Box 27655
Richmond, VA 23261

RE: SunTrust and BB&T Merger

To Whom It May Concern:

Knoxville Habitat for Humanity and SunTrust Bank have enjoyed a strong partnership for nearly 20 years, and we are pleased to submit this letter in support of the proposed merger between SunTrust and BB&T.

Knoxville Habitat for Humanity is a nonprofit organization that creates a pathway to homeownership for low income Knox County residents. In our 34-year history of creating affordable home ownership in Knox County we have built over 600 new homes, rehabilitated 100 homes and are in the early stages of developing our 4th subdivision. In addition to our vital role of creating affordable housing, we also provide critical home repair services to low-income seniors enabling them to live safely and age comfortably in their home. Through Habitat for Heroes, we provide an affordable, fast-tracked path to homeownership for low-income veterans and their families. The hallmark of our proven success with families is our homeowner education program. This program (generally dubbed, "sweat equity") requires each partner family to complete 500 hours of homeowner education that equips them to be successful homeowners.

All of our partner families earn 80% or less than the area median income, with the majority earning 45%-60% of the AMI. While our families have stable employment and steady incomes, they do not earn enough to qualify for conventional mortgages. The Habitat process of building homes with community partners and then selling the homes to partner families at an affordable rate (0% interest for 30 years), is a proven pathway out of generational poverty.

SunTrust has fully embraced our mission and been a key partner in serving low income families and making Knoxville a vibrant and quality city in which to make a home. SunTrust has been an indispensable partner in helping us achieve our mission. SunTrust, along with their employees, have funded and built homes, provided key leadership and governance through service on our board of directors, and heavily supported our homeowner education program for many years.

We believe that the merger with BB&T will ultimately create a stronger bank with even more resources to invest in local communities, therefore we enthusiastically support this merger and encourage its approval.

Sincerely,


Kelle R. Shultz
President & CEO


Angie Hatcher Sledge
Chief Development Officer

Eike, Kathy

From: Daphne Swanson <dswanson@jatoday.org>
Sent: Wednesday, April 17, 2019 1:22 PM
To: RICH BankSup Applications Comments
Subject: [External] BB&T and SunTrust merger

NONCONFIDENTIAL // EXTERNAL

PLEASE NOTE: This email is not from a Federal Reserve address.
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As a longtime customer and partner of SunTrust I am sending comments in support of the upcoming merger with BB&T. We have also partnered with BB&T and they have both been very supportive of our organizations with volunteers and financial contribution.

Please let me know if you have any questions.

Thank you,
Daphne Swanson, CPA | President & CEO
Junior Achievement of Central Virginia
Office: 1801 Libbie Ave., Ste 203, Richmond, VA 23226
JA Finance Park: 2100 Libbie Lake East St., Richmond, VA 23230
804-217-8855 x201 | www.JAtoday.org

[Make a donation](#)



Eike, Kathy

From: Reeves, Shakeena <sreeve11@wildcat.fvsu.edu>
Sent: Wednesday, April 17, 2019 1:53 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Cc: gweng@homefreeusa.org
Subject: [External] Best wishes Suntrust!

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To whom it may concern,

I am so excited to hear the news of SunTrust and BB & T merging together. I have banked with SunTrust for over ten years and I am delighted at the potential of Fort Valley, GA having access to a local Suntrust bank. In Fort Valley, GA students do not have access to free student checking. AS a CFA Scholar, I understand the importance of students and community members to have equality and efficiency within the banking system. Best wishes Suntrust! I support this union 100%

Best Regards,

Shakeena B. Reeves



Monday, April 8, 2019

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

To whom it may concern,

I write on behalf of Prospera, a 501c3 nonprofit, economic development organization that provides business education, consulting, access to capital and additional resources to help Hispanics establish or expand businesses. At this time and based on the information we have, Prospera supports the SunTrust and BB&T merger.

We are grateful to SunTrust for their support of Hispanic entrepreneurs and small businesses, for the financial contributions made to help us fulfill our mission. We received the SunTrust Foundation's 2018 Lighting the Way Award, along with \$75,000 to help us deliver services to more entrepreneurs. We also count on a SunTrust employee who volunteers time and talent to help us fulfill our mission by serving on Prospera's Statewide Board of Directors.

We look forward to the creation of a new financial institution that will be an active community partner, deeply committed to investing in the communities it serves. Per merger communications, our hope is that it will result in further opportunities to support organizations like ours.

Sincerely,

Augusto Sanabria
President & CEO

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

Investors' Circle:

Bank of America 


SUNTRUST
FOUNDATION



**3201 E. Colonial Drive, Suite A20
Orlando, FL 32803**

**2315 NW 107th Avenue #1M17
Miami, FL 33172**

**2002 N. Lois Avenue #660
Tampa, FL 33607**

FRED G. MILLS
P. O. Box 6171
RALEIGH, N. C. 27628

April 10, 2019

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



Dear Federal Reserve Bank of Richmond:

I am submitting the following in support of the SunTrust, BB&T merger. I have had very good experiences with both banks. Our company develops, builds, and manages affordable housing in North Carolina.

In December 2016 the Low-Income Housing Tax Credit, "LIHTC", pricing was shocked by the proposed lowering of the corporate income tax rate. Credit pricing dropped as much as 20%. SunTrust Community Capital, LLC, "STCC", was our equity provider for two LIHTC developments we were awarded that year by the North Carolina Housing Finance Agency. It was our good fortune that STCC stepped up to the plate. STCC provided equity for these two developments with only a 6% decrease in equity pricing. I will forever be grateful for their commitment to underwrite these two developments. Unfortunately, many LIHTC awarded in 2016 were never built. Perry Lane in Asheville, NC is a 120-unit development with 1,2, & 3-bedroom units affordable to residents at or below 60% Area Median Income. Long Creek II in Dallas, NC is an 80-unit development with 1,2, & 3-bedroom units affordable to residents at or below 60% Area Median Income.

SunTrust has provided equity and construction for a 2018 award we received for Woodlane Street Apartments in Granite Falls, NC. Woodlane Street Apartments is a 66-unit development with 1,2- & 3-bedroom units affordable to residents at or below 60% Area Median Income. SunTrust Community Capital, LLC again was very competitive providing the equity required to make Woodlane Street a reality.

Fred G. Mills



The Regas Building • 318 N. Gay St., Suite 101 • Knoxville, TN 37917
Phone: 865-851-7064 • www.girltalkinc.com

Board of Directors

April 11, 2019

Mary Ellen Brewington

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

Tricia Bruce, *Secretary*

Courtney Childers

Re: SunTrust and BB&T Merger

Hella Ewing

Brooke Greene

Girl Talk, Inc. is a proud partner of SunTrust Bank in Knoxville, TN. We are pleased to extend our support of the SunTrust and BB&T Merger.

LaTonya Jordan, *Treasurer*

Cammy Kromer, *Board Chair*

Girl Talk, Inc. is a 501(c)3 non-for-profit organization that exists to empower girls to become their best selves by reducing the likelihood of teen pregnancy and helping them to advance educationally. We have been in existence for over 11 years working to develop self-sufficient women through financial literacy, mentoring, self-esteem building, and college and career planning. We have served over 300 girls in the East TN Region. Through three main programs, our objectives are accomplished.

Goldie Littlejohn

LaKenya Middlebrook, *Immediate Past Chair*

Alaka Williams

Pam Wolf

Girl Talk, Inc. has a long standing collaborative relationship with SunTrust Bank. This relationship allows members of SunTrust Bank to integrate into our programs, events, and training/development activities that are designed to empower our girls and our families. Over the past few years, SunTrust Bank has deployed several team members to participate in career panel discussions, succession planning/savings lessons for our girls, and career tours to expose our girls to the various job opportunities in the banking industry. This collaboration has fostered trust and value-filled relationships between SunTrust and our girls/staff. We value and are grateful for the partnership and support of SunTrust Bank. I pray they have the opportunity to continue the amazing work they do every day in our community.

Yours Sincerely,

Denetria D. Moore
Founder/Executive Director
Girl Talk, Inc.



United Way of the Big Bend

Sent VIA US Mail and ELECTRONICALLY to comments.applications@rich.frb.org and BankMergerApplication@fdic.gov

April 8, 2019

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

FDIC – Atlanta Regional Office
10 10th Street, N.W.
Suite 800
Atlanta, GA 30309



Dear Madam/Sir,

I am writing to express my sincere appreciation for SunTrust Bank's (SunTrust) longstanding strong and committed partnership with United Way of the Big Bend (UWBB) both in terms of volunteer time and financial support. SunTrust has especially been committed to supporting our efforts to address the needs of our ALICE population. ALICE is the acronym for Asset Limited Income Constrained Employed, more simply an acronym used to describe people in our community who are living in poverty and/or struggling to make ends meet.

It is our understanding that SunTrust has or will soon be filing an application with the appropriate federal regulatory agencies for a merger of equals with BB & T. We are confident this proposed merger will serve to strengthen SunTrust's position in our Big Bend community. UWBB would like to express its support for the proposed merger between SunTrust and BB & T.

With an established history of addressing the needs of those in our community who most need our support, UWBB knows that economic insecurity is a critical need that our community must take a collaborative approach to address. SunTrust's continued support of UWBB and our collaborative efforts with our community, helps enable us to work to identify targeted solutions to the economic insecurity problem by funding programs and initiatives designed to address this important human service need.

Finally, we believe this merger of equals between SunTrust and BB & T will bring an even stronger engagement in our community's effort to support the most vulnerable living amongst us. UWBB therefore enthusiastically supports SunTrust's merger application with BB & T.

Very Truly,

A handwritten signature in blue ink that reads "Katrina D. Rolle".

Katrina D. Rolle



DEBORAH F. SCANLAN
President & CEO

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Florida National Guard

* * * * *
DAVID MCEACHERN, President Emeritus

April 17, 2019

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

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

To Whom It May Concern,

As a nonprofit partner of HomeFree-USA, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America.

I hereby support this merger and wish SunTrust greater success.

Regards,

Deborah F. Scanlan
President & CEO
St. Petersburg Neighborhood Housing Services, Inc.
dba Neighborhood Home Solutions

Eike, Kathy

From: liberty@butterfly-sc.com
Sent: Wednesday, April 17, 2019 4:37 PM
To: RICH BankSup Applications Comments
Subject: [External] Comments

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To whom it may concern,

I'm writing in support of Sun Trust merger application. Sun Trust has been a significant partner with The Butterfly Foundation for the past 5 years. Grant funds awarded to our organization has assisted over 160 adults an opportunity to complete a 15 week culinary job training program and obtain employment in our local community. The Butterfly Foundation currently provides a 15 week culinary job training to adults who are unemployed, underemployed, previously incarcerated, and/or homeless. Soft Skills, Servesafe certifications, culinary curriculum, and field trips are coordinated to provide complete experience of working in a commercial kitchen. We are certain that without the assistance from Sun Trust we would not have been able to serve and make a positive impact in this community. Please feel free to contact me if you need additional information.

Make it a Great Day...

Liberty Canzater
President/Founder
(864)582-4146 - office
(864)583-1619 - fax
www.butterfly-sc.com



Creating affordable housing. Building strong communities.
Desarrollando viviendas económicas. Construyendo comunidades.

April 12, 2019

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

To Whom It May Concern,

On behalf of Mi Casa, Inc. I am writing to support the merger between SunTrust Bank and BB&T. It is our hope that this merger will open the opportunity for increased funding for affordable housing developers and increased financing for affordable housing projects in Washington, DC.

SunTrust Bank has been a supporter of Mi Casa since the very beginning of the organization's existence. As a co-founder of the organization, 25 years ago, I remember that when other financial institutions wouldn't support and take a chance on us, SunTrust Bank was there. In addition to the financial support, SunTrust also gave in-kind contribution through the talents of Idris Abdullah an employee who was a member of the Board of Directors. The Bank also hosted our 25th anniversary celebration at its beautiful headquarters in Washington, DC.

As one of our oldest partners, SunTrust Bank has been committed to affordable housing and community development issues in our city. Mi Casa is a nonprofit affordable housing developer based in Washington, DC with a mission to preserve and provide affordable housing to promote diverse, sustainable communities and prevent displacement of low-income communities.

Please contact me should you have any questions. I can be reached at fernando@micasa-inc.org or 202-722-7423 ext. 1.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "FL" or "AK", is written over a vertical line. A long, thin arrow points from the signature towards the top right corner of the page.

Fernando Lemos
Executive Director

Eike, Kathy

From: Carne Mahone <morningstarinc33@gmail.com>
Sent: Wednesday, April 17, 2019 6:25 PM
To: RICH BankSup Applications Comments
Subject: [External] SunTrust & BB&T Merger

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PLEASE NOTE: This email is not from a Federal Reserve address.
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My name is Carne Mahone. I am the Executive Director of Morningstar Urban Development Inc. a Community Development and Based Organization. Our overall Mission is to empower, educate and coach families & individuals into homeownership and financial independence for the 21st Century. Morningstar Urban Development Inc, is passionate about the impact that such information has on the lives of individuals, the communities we serve, and the lives we help to transform.

I wanted to go on record to say that we support the merger of Suntrust & BB&T and see it as a way to increase & expand the available Banking, Mortgage, Financial Products, and branches available in our communities. We applaud this union and is looking forward to how this positively impact our communities.

Thank You

Carne Mahone | Executive Director

Morningstar Urban Development Inc.

2501 Lantrac Court

Decatur, Ga. 30035

Office: 770-492-4037

Fax: 888-397-5508

Email: Mudi.Clients@gmail.com



THEARC
THEATER



BUILDING BRIDGES ACROSS THE RIVER
1901 Mississippi Avenue, SE ♦ Washington, DC 20020
202-889-5901 ♦ thearcdc.org

April 12, 2019

Federal Reserve Bank of Richmond

P.O. Box 27622

Richmond, VA 23261

LETTER OF SUPPORT

To Whom It May Concern:

As the president of Building Bridges Across the River (BBAR), an anchor nonprofit organization located in Washington DC, I would like to express my (strong) support for SunTrust Bank and its merger application. SunTrust has partnered with BBAR to serve the under-resourced communities east of the Anacostia River in the nation's capital. SunTrust's partnership has been absolutely vital to us. As the largest social service, multi-sector, nonprofit collaboration in the country, we rely on trusted corporate partners like SunTrust to achieve what many believe is the unachievable east of the river: provide residents the best in-class services the city has to offer in the most unlikely places. Through general operating support, financing support, technical assistance and volunteerism, SunTrust has been a trusted partner.

I believe this merger will play an even more integral and important role in how we serve the community and will expand our reach to impact more lives. Our community is in desperate need for investment in programs that support education, arts and culture, health/wellness, employment, and community pride. Over the last 14 years, we have met that need with the support of SunTrust.

Please retain this email for your records.

No goods or services were provided in exchange for this donation.

The 11th Street Bridge Park is a project of Building Bridges Across the River, a non-profit 501c3 organization
The IRS ID number for Building Bridges Across the River at THEARC is 52-2013526.



THEARC
THEATER



BUILDING BRIDGES ACROSS THE RIVER
1901 Mississippi Avenue, SE ♦ Washington, DC 20020
202-889-5901 ♦ thearc.org

I eagerly anticipate this merger and I am extremely grateful for the opportunity to write a letter in support of it.

Sincerely,

A handwritten signature in black ink, appearing to read "Rahsaan G. Bernard".

Rahsaan G. Bernard

President

Building Bridges Across the River

Please retain this email for your records.

No goods or services were provided in exchange for this donation.

The 11th Street Bridge Park is a project of Building Bridges Across the River, a non-profit 501c3 organization
The IRS ID number for Building Bridges Across the River at THEARC is 52-2013526.



2201 Lawrenceville Highway
Suite 300
Decatur, GA 30033
404.420.9900 **Phone**
404.584.6672 **Fax**
404.584.6673 **TDD**

April 17, 2019

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

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

To Whom It May Concern:

On behalf of Goodwill of North Georgia, I offer this letter of support for the SunTrust Bank and BB&T merger. Goodwill of North Georgia has benefited for several years from banking services being provided by both SunTrust and BB&T. While I am confident that your regulatory review process will reveal the impact that SunTrust Bank has made through community involvement and business partnerships, I wanted to share a few examples for your consideration.

Goodwill of North Georgia's long-standing mission is to put people to work. We rely on business partners to help us prepare job seekers for work by developing critical skills through our numerous training programs. SunTrust has partnered with us over the last several years to volunteer in our mock job interview and resume writing programs as well as a few of our financial literacy courses.

Like most nonprofit organizations, Goodwill of North Georgia relies on support from donors and grant makers to deliver our programs and services to job seekers throughout our 45-county territory in north Georgia. In 2015, the SunTrust Foundation awarded Goodwill of North Georgia a \$200,000 grant to support the building of our 13th career center located in Decatur, Georgia. This center serves as a shared resource and training hub for all Goodwill career centers. Since our opening in the summer of 2016, we have served 16,140 job seekers.

Our strong partnership with SunTrust Bank leaves me with no doubt that a merger with BB&T will only multiply the financial institution's ability to serve customers and communities even more.

Sincerely,

A handwritten signature in black ink that reads "Keith T. Parker".

Keith T. Parker
President and CEO
Goodwill of North GA



community.empowerment.fund

208 N. Columbia Street, Suite 100 • Chapel Hill, NC, 27514 • 919-200-0233
info@communityempowermentfund.org • www.communityempowermentfund.org

April 16, 2019

To Whom It May Concern,

I am writing on behalf of the Community Empowerment Fund (CEF) in support of the proposed merger between SunTrust Bank and BB&T Bank. Both institutions have supported CEF's mission to provide financial empowerment and housing support for those experiencing or at-risk of homelessness in Durham and Orange Counties, North Carolina. We trust that the proposed merger would only enable broader community investments in organizations like CEF.

Both institutions have proven critical to expanding CEF's core programming through innovative pilot initiatives. For instance, SunTrust Bank has partnered with us since 2016 to expand our Renter's Savings and Home Buyers Club Programs, allowing us to provide personalized financial coaching and matched savings in support of down payments and closing costs. Meanwhile, BB&T Bank has been a CEF partner since 2017, helping us with a rent reporting pilot project in conjunction with the Durham Housing Authority and Durham Community Land Trustees, which allowed 58 households to enroll in free rent reporting and/or financial capability-building services.

What we have most appreciated about our relationship with both SunTrust and BB&T Banks is each institution's clear recognition that the work of local non-profits is strengthened through collaboration and partnerships with other service providers. BB&T Bank, for instance, convenes a regular roundtable of nonprofit leaders to connect and discuss emergent issues in their community. Meanwhile, SunTrust Bank supports many key CEF partners in their own work, thereby ensuring that their investment in each also strengthens the work of each connected partner. We appreciate each organization's collaborative approach and realization that no organization works in a vacuum. CEF trusts in our partner institutions that if the merger is complete, there will remain a clear commitment to investing locally and collaboratively in this community.

Many thanks for your consideration, and please do not hesitate to reach me with questions.

Sincerely,

Janet Xiao

Co-Director, Community Empowerment Fund
(919) 797-9233 - janetx@communityef.org

Eike, Kathy

From: Saraya Ashley <SMAshley11@my.fisk.edu>
Sent: Wednesday, April 17, 2019 10:07 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Cc: Gwen Garnett
Subject: [External] Letter to Suntrust

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April 16, 2019

FDIC

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

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

To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement™ Historically Black College and University Scholar, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America. Being a freshman in college within this program, I have understood the importance of preparing oneself for home owning. I am extremely interested in getting into the understanding of buying properties. I hereby support this merger and wish SunTrust greater success.

Regards,

Saraya Ashley
Fisk University Student

Get Outlook for iOS

April 17, 2019

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Atlanta Regional Office

10 10th St., NW, Suite 800

Atlanta, GA 30309-3849

Federal Reserve Bank of Richmond

P.O. Box 27622

Richmond, VA 23261

To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement scholar, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America. I have very honored to have Fisk University as a HomeFree-USA Historically Black College and University partner. I am a freshman at Fisk University and being a CFA scholar has provided me with an in surmountable amount of opportunities. All this possible because of HomeFree-USA's partners which include SunTrust.

I hereby support this merger and wish SunTrust greater success.

Best Regards,

Chidera M. Okeke



April 15, 2019

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

To whom it may concern:

I am pleased to commend SunTrust for its history of community service in the Washington Metro Area and in particular to Bright Beginnings. We are a child and family learning center dedicated to families with young children who are experiencing homelessness. For more than 20 years, SunTrust has supported Bright Beginnings' work through financial contributions, volunteering in the classrooms, and advising the organization as we sought to acquire property and build a second center.

In July of 2014, SunTrust Community Development Manager Muriel Garr and the executive leadership of SunTrust came to Bright Beginnings to present a check for \$5,000 drawn from personal contributions of those assembled.

The District of Columbia is a stronger community thanks to financial institutions like SunTrust. The merger of SunTrust and BB&T will lead to even greater community involvement and we support it.

Sincerely,

A handwritten signature in cursive script that reads "Marla M. Dean".

Marla M. Dean, Ed.D.
Executive Director

From: [Bonnie Bella](#)
To: [BankMergerApplication](#)
Subject: Comments--Merger of SunTrust and BB&T
Date: Monday, April 15, 2019 12:51:20 PM

Please accept this email in support of the merger between SunTrust and BB&T banks. SunTrust is a trusted and deeply committed community partner in the Charleston SC region. They have heavily invested time and financial resources in community projects and the non-profit sector as a whole, to ensure that children and families have access to services to improve education and financial stability.

Mark Lattanzio, the Region President, is highly visible and well respected across the community. He has been actively involved in making area organizations strong and sustainable. The bank also encourages its employees to be engaged supporters of projects critical to the success of the region. Reading Partners has been one of many organizations that have benefitted from the expertise and leadership of a senior staff member of the bank.

The community needs the continued presence of strong financial institutions. We believe that together SunTrust and BB&T will provide leadership and support necessary to ensure that our region continues to thrive.

Thank you for the opportunity to make this comment.
Bonnie Bella

[Bonnie Bella, Ph.D.](#) | Director, Development & Strategy
Reading Partners South Carolina
bonnie.bella@readingpartners.org | C: (843) 696-2148

From: [Bob Adams](#)
To: [BankMergerApplication](#)
Subject: March 21, 2019 - Proposal by BB&T Corporation To Acquire SunTrust Banks, Inc. and its Subsidiary
Date: Monday, April 15, 2019 1:31:36 PM

I am writing to provide comments in support of the work SunTrust is doing in our community. SunTrust has been a steady supporter of Housing Virginia over many years. Housing Virginia is a not for profit organization that works to expand affordable housing opportunities throughout the state. We do this primarily through the provision of high quality, comprehensive up to date data that helps communities understand what is happening with respect to the availability and affordability of housing in their area.

We also help to develop policy solutions and engage in community dialogue about the importance of affordable housing through meetings, conferences and events. We have worked particularly closely with Robin Pope-Moss and others at Suntrust in carrying out our mission. I appreciate the opportunity to provide these comments.

Bob Adams



HOUSING VIRGINIA

Robert J. Adams
Executive Director
203 N. Robinson Street
Richmond, Va. 23220
804-915-6729 (o)
804-915-9425 (f)
804-240-3755 (c)
bob@hdadvisors.net
www.housingvirginia.org

From: [Drew Langloh](#)
To: [BankMergerApplication](#)
Subject: BB&T Bank
Date: Tuesday, April 16, 2019 1:01:44 PM

April 16, 2019

To: BankMergerApplication@fdic.gov

From: Drew Langloh

BB&T Bank is a valued United Way of Central Alabama partner. For many years BB&T served as a significant part of our Financial Stability Partnership, which focuses on improving the quality of life of low-to-moderate income individuals in our five-county area.

Each year BB&T associates participate in our Financial Housing and Education program presenting financial education workshops for our low-to-moderate income clients. We have been fortunate to host the BB&T Bus on many occasions, where BB&T associates are on-site working one-on-one with clients to review credit reports and provide guidance on repairing or growing credit. In addition, BB&T associates serve as volunteer tax preparers in our Volunteer Income Tax Assistance (VITA) program.

In addition to supporting our programs serving low-to-moderate income families, BB&T provides generous support to the community through its annual United Way employee campaign, and enabling local BB&T leadership to serve on our board of directors and Visiting Allocation Teams.

We are deeply appreciative of BB&T's commitment to our community and look forward to continuing our partnership as SunTrust and BB&T complete their merger. Please let me know if you have questions or would like additional information.

John A. Langloh
President and CEO
United Way of Central Alabama
P. O. Box 320189
Birmingham, AL 35232-1089
Phone: 205-458-2020 E-mail: dlangloh@uwca.org

Eike, Kathy

From: Executive Director <executive.director@bcuw.org>
Sent: Thursday, April 18, 2019 11:30 AM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Subject: [External] Comments

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PLEASE NOTE: This email is not from a Federal Reserve address.
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Thank you for the opportunity to provide comments. Burke County United Way views our partnerships with both Suntrust and BB&T in high regard. Below are our comments and a few statistical facts that we hope you find helpful:

- Each institution has equally demonstrated their commitment to our community
- Each recognize Burke County United Way as a neutral convener around crucial issues that impact our community and then collectively work to find (and fund) solutions.
- Campaign:

Suntrust-Employees 5 yr ave \$1,140

Corporate \$1,854

BB & T Local Employees 5 yr ave - \$2,314

Home Office Employees - \$1,124

Corporate - \$0

- Volunteerism:

Suntrust- Helped stuff a mailer for one of our fund-raising events.

BB&T- Morganton employees did their annual project with 2 of our agencies. The local branch allowed one of agencies to use their parking lot during our City's large Fall festival to park cars and raise funds.

Maureen "Mo" Schwind
Executive Director
Burke County United Way
828-433-0681
www.bcuw.org



April 18, 2019

FDIC

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

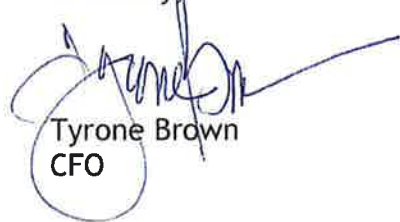
Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261

To Whom It May Concern,

I fully support the SunTrust and BB&T merger.

SunTrust is an excellent partner of HomeFree-USA. They have been active in the community and work with my organization to help LMI borrowers. HomeFree-USA has had the opportunity to work with SunTrust representatives and they all are very committed to their work and the communities that they work in.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tyrone Brown".

Tyrone Brown
CFO

Eike, Kathy

From: Hyland, Donna <Donna.Hyland@choa.org>
Sent: Thursday, April 18, 2019 12:03 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Cc: jenna.kelly@suntrust.com
Subject: [External] SunTrust-BB&T Merger

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

To Whom it May Concern:

Children's Healthcare of Atlanta has over a 100 year relationship with SunTrust Bank. SunTrust has been an exceedingly important part of the Atlanta community for over a century. Not only serving the constituents of the community through banking services, but importantly as an outstanding community citizen. Our organization has certainly benefited from their charitable and philanthropic support and also importantly from leaders of SunTrust participating in significant ways on our Board of Trustees. We have been very fortunate that several SunTrust executives have and continue to serve on the Board of Children's Healthcare of Atlanta. As one of Atlanta's premier civic assets we are very blessed to have executives not only serve on our Board, but in the case of SunTrust, chair our Foundation Board and provide their skill and talent to enable our organization to serve more children and meet our mission.

Additionally, I have served on the Georgia Advisory Board for SunTrust and have had the opportunity to see the broad impact on our community, supporting many community assets. We are supportive of the merger of SunTrust and BB&T and look forward to seeing this merger strengthen the organization and serve an even broader spectrum of our nation.

Sincerely,

Donna Hyland

cc: Jenny Kelly

Donna Hyland
President and CEO
Children's Healthcare of Atlanta
Email: donna.hyland@choa.org
Direct Dial: 404-785-7002





April 18, 2019

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

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

To Whom It May Concern,

SunTrust is an excellent partner of HomeFree-USA. I appreciate the activity of SunTrust in our community, and each representative that comes to our office understands the community, LMI borrowers and appears to be very committed to their work.

I hereby support this merger and wish SunTrust greater success.

Regards,

A handwritten signature in black ink, appearing to read "Nicera Countee", written over a light blue horizontal line.

Nicera Countee



April 17, 2019

Federal Deposit Insurance Corporation
Atlanta Regional Office
10 10th Street NW, Suite 800
Atlanta, GA 30309-3849

To Whom It May Concern,

I am writing in support of SunTrust Bank and its proposed merger with BB&T. Both of these financial institutions have an impressive record of being active and supportive of the communities in which they do business.

The Florida Guardian ad Litem Foundation has been a community partner with SunTrust Bank for several years. During this time, SunTrust Bank has supported our organization financially and with bank employees who volunteered to advocate for the foster care children we represent.

SunTrust Bank has provided funding for training events that allowed us to conduct training's for our Guardian ad Litem volunteers that otherwise would not have been possible. These trainings allow us to better educate our volunteers and give them skills and knowledge that make them more effective advocates for the children they serve. Guardian ad Litem volunteer's advocacy for these abused, neglected, and abandoned children is without peer. They are truly a voice for the child.

I am confident that the proposed merger of SunTrust Bank and BB&T will result in a bank that is fully committed to improving the communities they serve, to promote volunteerism, and to financially support many worthwhile nonprofit organizations.

If you have any questions of me please do not hesitate to contact me at (850) 363-7457.

Sincerely,

Eric Clark

Chief Executive Officer

April 18, 2019

FDIC

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

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

To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement™ Historically Black College and University partner, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America.

As a CFA Scholar at Fisk University, I have learned great financial literacy skills for my future. Before joining the CFA Scholars Program, I never thought about being a young homeowner, but through this program I have been able to picture myself doing it. Not only did I learn things about homeownership, but also about building good credit, budgeting my money, and gaining relationships to build my network.

With the Money 4 Life Conference and Buy Your Home Using Other People's Money Conference, supported by HomeFree-USA, I have been able to invite other students outside of the CFA Scholars Program to come to these events so that more people in the community can gain the essential information. I have also been able to take detailed notes to share with family members and friends who are not in the Nashville area, including my older brother who wants to be a young homeowner and was a former HBCU grad. The program is beneficial not only to the students who are in it, but the people around them.

I hereby support this merger and wish SunTrust greater success.

Regards,



Madiya E. Farmer

Eike, Kathy

From: Debra Simmons <dsimmons@niacdc.org>
Sent: Thursday, April 18, 2019 3:22 PM
To: RICH BankSup Applications Comments
Cc: Debra Simmons
Subject: [External] letter of support

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PLEASE NOTE: This email is not from a Federal Reserve address.
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My name is Debra Simmons, director of Neighborhood Improvement Association (NIA) in Savannah, GA. I am writing to share NIA's support for the merger of SunTrust and BB&T Banks. For years, SunTrust has been supportive of NIA's programs by offering financial support and professional guidance. SunTrust's assistance has helped NIA offer services to the underserved population by encouraging them to save and use their finances in constructive ways.

NIA is a non-profit Community Development Corporation located in Savannah, GA. Its mission is to promote positive change in individual, family and community circumstances by improving physical, economic and social conditions in Chatham County. NIA offers three asset building services to the low to moderate income community: Volunteer Income Tax Assistance (VITA); First Time Homebuyer Workshops and Affordable Home Builders Program.

VITA: NIA is the lead organization for the Savannah Coastal Empire Asset Building Coalition. This coalition is a 20 organization partnership that offers the VITA Program to taxpayers in Bryan, Chatham, Effingham, Richmond, Kingsland and Ware Counties. VITA is an IRS initiative of free tax preparation to help low to moderate income taxpayers, persons with disabilities, limited English speaking taxpayers and the elderly. For the scope of this program, the IRS defines low to moderate income as individuals/families making less than \$54,000 per year. This program saves taxpayer over \$1.2M per year in tax preparation fees and claim over \$2.3M in refundable credits.

First Time Homebuyer Workshops: NIA is a State of Georgia Department of Community Affairs approved housing counseling agency that provides free home buyer education to approximately 200 potential first-time home buyers annually. NIA partners with local housing experts to offer free workshops that emphasize budgeting, rebuilding & maintaining good credit, mortgage lending, home-owners insurance, home inspections and the closing process.

Home Developer: NIA also collaborates with the City of Savannah's Housing Department to make home buying affordable for first time home buyers. NIA is a housing developer who build homes with the City offering down payment assistance which makes the homes affordable for the first time home buyer. Households with a combined gross income of 80% or less of the area median income for Savannah, as established by HUD, may qualify to participate.

It is with great honor that we submit this letter in support of SunTrust Bank. If you have any questions or concerns, please feel free to contact me. Thanks.

Debra Simmons

Executive Director
Neighborhood Improvement Association
1812 Abercorn Street
Savannah, GA?? 31401
912-447-5577 phone
912-447-5599 fax
??



April 18, 2019

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

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

Proposed Merger of BB&T and SunTrust Banks

To Whom It May Concern:

My family has been banking with "SunTrust Bank" since 1909--110 years. My grandfather started with Mr. Hill when he formed his proprietorship and began doing small grading jobs and basements around Durham, North Carolina. SunTrust has always been there for 3 generations of our family as we bank with them and invest with their private wealth management bank.

Throughout the years "Durham Bank & Trust Co." predecessor to SunTrust provided credit for the employees of Durham's tobacco and textile mills so they could afford company housing near the factories. They also provided financial services for Durham's businesses. SunTrust has been a loyal and trustworthy advocate for Durham for over 110 years. They have contributed heavily to non-profits and organizations for the further good of Durham through their presences in Durham and surrounding towns and cities.

SunTrust has provided scholarships to many of our young people so they could access our community colleges. Their history of giving over the years has been strong, and their contributions to our public schools have been stellar.

My family and I without a doubt are in favor of this merger as we feel it will strengthen money center banking in our region. Please feel free to contact me if you would like additional input and or a testimonial: Robert D. Teer, Jr., 3400 Croasdaile Drive, Suite 201, Durham, NC 27705; telephone number 919-549-9506.

Best Regards,

A handwritten signature in blue ink that reads "R. D. Teer, Jr." with a stylized flourish at the end.

Robert D. Teer, Jr.

April 18, 2019

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

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

To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement™ Historically Black College and University partner, it is my pleasure to support the merger of SunTrust and BB&T. I attend Fisk University in Nashville, Tennessee. HomeFree-USA has helped me in getting a firm grip on finances and how to start a successful financial life. I would like to thank HomeFree-USA for all they've done and I would also like to congratulate SunTrust and BB&T on their merge to become America's premier financial institution. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America.

I hereby support this merger and wish SunTrust greater success.

Regards,

Zhane J. Ballard

April 17, 2019

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

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

To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement™ Historically Black College and University partner from Fisk University and a proud CFA Scholar, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations and minority communities while being actively committed to the growth of homebuyers and homeowners across America.

I hereby support the merger between both institutions and wish them nothing but success and continued growth.

Regards,
Zachary Wemyss
CFA Scholar

April 18, 2019

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

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P.O. Box 27622
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To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement™ Historically Black College and University partner, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America.

As a beneficiary of HFUSA's Center for Financial Advancement at Fisk University, I can testify to the tremendous, and great, work done to prepare students at HBCUs for leadership, financial freedom, and post-graduate excursions.

I hereby support this merger and wish SunTrust greater success.

Regards,

Nicholas Whiteside

Nicholas Whiteside
Fisk University
Center for Financial Advancement Scholar



April 18, 2019

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

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

To Whom It May Concern,

As a HomeFree-USA employee and Director of the Center for Financial Advancement™ at Historically Black College and University, it is my pleasure to support the merger of SunTrust and BB&T. As a retired banking executive, I know SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America.

SunTrust is an excellent partner of HomeFree-USA. I appreciate the activity of SunTrust in our community, and each representative that comes to our office understands the community, LMI borrowers and appears to be very committed to their work.

I hereby support this merger and wish SunTrust greater success.

Regards,

Gwen Garnett
Program Director
HomeFree-USA

April __, 2019

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

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

To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement™ Historically Black College and University partner, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America. The Center For Financial Advancement has been a phenomenal experience in my freshman year in college

I hereby support this merger and wish SunTrust greater success.

Regards,
Chideraa Apakama,
Fisk University

April 18, 2019

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

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

To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement™ Historically Black College and University partner, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America.

I hereby support this merger and wish SunTrust greater success.

Center for Financial Advancement opened so many opportunities in my life. The program enhanced my leadership skill and introduced me to corporate mortgage industry. Furthermore, I learned more about managing finances. I am grateful to Home Free USA for providing me this amazing opportunity which help me to grow as a responsible person.

Regards,
Malika Lawaju,
Center for Financial Advancement Scholar, Fisk University.

April 18, 2019

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

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

To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement™ Historically Black College and University partner, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America. It is a pleasure having the opportunity to learn the process of home buying at Fisk University.

I hereby support this merger and wish SunTrust greater success.

Regards,

Ta'Naisha Hillman

April 19, 2019

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

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

To Whom It May Concern,

As a HomeFree-USA Center for Financial Advancement™ Historically Black College and University partner, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported nonprofit organizations in their footprint and is committed to the growth of homebuyers and homeowners across America. The work that is done by these two entities are important and I know that they will only be stronger together.

I hereby support this merger and wish SunTrust greater success.

Regards,
Chandler Claiborne

Eike, Kathy

From: Tracy Altizer <tracy.altizer@rescuemission.net>
Sent: Friday, April 19, 2019 7:56 AM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Subject: [External] SunTrust / BB&T Merger

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Members of the Federal Reserve and FDIC:

I am writing to you in support of the proposed merger between SunTrust Bank and BB&T.

My name is Tracy Altizer and I am the Chief Development Officer of the Rescue Mission of Roanoke. SunTrust in particular has been a longtime supporter of the Rescue Mission. I have worked closely for several years with Scott Horchler, VP/Greater VA Community Development Manager, and his assistance has been valuable in helping us seek and obtain grant funding from SunTrust. He understands the pressing needs in our region both from an economic standpoint and a human standpoint, and works hard to build strong community connections and relations.

Local Senior VP of Commercial Banking Chad Brown is our current Executive Board President at the Rescue Mission. Mr. Brown also understands the important responsibility that banks and corporations have in not only growing their businesses, but in helping to lift the whole community from the bottom up. He volunteers, he supports financially, and he is a staunch advocate of meeting the needs of the less fortunate.

From my conversations with both of these individuals, I have been assured that this merger will not lead to any diminished support for our non-profit organization or others. In fact, I believe the merger will create an even greater capacity to "share the wealth," and I have every hope that will lead to more grants, and grants at higher levels for our organization and others.

Thank you for this opportunity to provide insight on the proposed merger from our non-profit perspective. I am happy to answer any questions should you feel a need to contact me.

Sincerely,

Tracy Altizer

--

Tracy Altizer
Chief Development Officer
Roanoke Rescue Mission
540-777-7689
www.rescuemission.net

Eike, Kathy

From: Dana Clayton <dclayton@unitedwayncfl.org>
Sent: Friday, April 19, 2019 10:04 AM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Subject: [External] SunTrust Merger Support

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To Whom It May Concern

I am writing on behalf of the United Way of North Central Florida in regards to support of the SunTrust Merger. SunTrust has been an important part of our community as well as a supporter of United Way of North Central Florida. Over the last 7 years, they have invested over \$250,000 back into our community through their employee workplace campaign as well as their corporate gifts. They have also performed “days of service” with United Way over the years as well as having special events to support our local partner agencies. Brad White, who is now retired, previously served on our Board of Directors for many years.

We look forward to continuing our long relationship with Suntrust under their merger and new name.

Thank you,

Dana P. Clayton, Vice President of Resource Development Partnerships
United Way of North Central Florida
6031 NW 1st Place
Gainesville, FL 32607
Direct Line: (352) 333-0846 | Cell: (352) 316-4092 | Fax: (352) 331-2111
Visit us: www.unitedwayncfl.org

Special Thanks to Our Academy Sponsors



Eike, Kathy

From: Joe Brannen <jbrannen@gabankers.com>
Sent: Friday, April 19, 2019 10:21 AM
To: RICH BankSup Applications Comments
Subject: [External] Proposed merger between BB&T and SunTrust banks

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To whom it may concern:

I write on behalf of the Georgia Bankers Association in support of the Boards of Directors of BB&T and SunTrust Bank who have voted to enter into a merger agreement.

Bank boards of directors are charged with the fiduciary responsibility of representing the best interests of their shareholders and the boards have concluded this merger is in their best interests.

We feel strongly the decisions of the boards and subsequent votes of their shareholders should be respected.

Joe Brannen



Joe Brannen
President & CEO
Georgia Bankers Association
jbrannen@gabankers.com
O: 404.420.2026 | M: 404.401.0274
F: 404.527.8803
www.gabankers.com
  **Linked in**  

Eike, Kathy

From: Bihms, Shari <sbihms@childhelp.org>
Sent: Friday, April 19, 2019 12:42 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Cc: muriel.garr@suntrust.com; Mandanis.Peter
Subject: [External] Childhelp Comments

NONCONFIDENTIAL // EXTERNAL

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Dear SunTrust,

Please see below the comment from our National Childhelp headquarters as requested.

Thank you,

Shari

Childhelp was fortunate to secure a \$20,000 grant from the Sun Trust Foundation to support Childhelp's Alice C. Tyler Village located in Lignum, VA, a residential facility for severely abused children.

Founded in 1959, Childhelp is one of the oldest and largest national non-profit organizations whose mission is to meet the physical, emotional, educational, and spiritual needs of abused, neglected and at-risk children. Childhelp programs, developed and perfected over the years, provide advocacy, prevention, treatment and community outreach services to child victims and their non-offending family members.

The Alice C. Tyler Village provides services that focus on treating the “whole” child. This holistic approach, with a multi-disciplinary team of therapists, doctors, teachers and child care workers, helps child victims overcome their fears, improve their coping and life skills, and helps improve the likelihood of achieving short and long-term goals

Program generated revenue (state reimbursements), private foundations and corporate support provide the base for program sustainability. Additionally, revenue generated from local and national fundraising events and activities help support the Village.

Support from community based corporations and foundations such as the Sun Trust Foundation is critical to the program's continued sustainability. Local support helps ensure that the children in our care can look forward to a better future. We look forward to continuing our partnership with the merged financial institution.

Shari D. Bihms, Esq. | Board Relations & Event Coordinator



D.C. Office: 2112 8th Street NW. #329, Washington, DC 20001

Headquarters: 4350 E. Camelback Road Suite F250, Phoenix, Arizona, 85018

Phone: 480-922-8212 | Cell: 713-259-4819 | Fax: 480-922-7061

E-Mail: sbihms@Childhelp.org

Website: <http://www.childhelp.org>

EX.14:14

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UNIVERSITY OF GEORGIA
EXTENSION

Chatham County
17 Minus Ave
Garden City, 31408
TEL 912-652-7982 |
uge3051@uga.edu

From: Jackie E. Ogden
To: Bank Merger Application
Subject: SunTrust/BB&T Merger
Date: Wednesday, April 17, 2019

The University of Georgia Cooperative Extension has been engaged in providing diverse Family and Consumer Sciences financial education outreach programs and services for consumers throughout Georgia. This correspondence is an opportunity for UGA Extension-Chatham County Family and Consumer Sciences program to extend a heartfelt thank-you to SunTrust for the support to collaborate on numerous financial education initiatives. SunTrust Bank has been an active community business education partner to engage with UGA Extension to support and create financial education resources that would empower all citizens. This outreach has also included working with unbanked consumers to encourage financial education to improve personal fiscal well-being of individuals and families. SunTrust has demonstrated their commitment to lifelong financial education throughout the lifespan for our local citizens by the involvement of their workforce in community financial education outreach.

SunTrust's many years of commitment to diverse consumer markets has supported financial education initiatives for students and families in the Savannah-Chatham County Public Schools, Junior Achievement of Coastal Georgia, The Housing Authority of Savannah and the University of Georgia Cooperative Extension Family and Consumer Sciences financial education program development team initiatives that have been offered to individuals and families throughout our community.

Collaborative outreach by SunTrust with UGA Extension in Chatham County included projects such as: Steps on the Path to Home Ownership, Renters Education, America Saves, Georgia Saves, Bank on Savannah, Mayor's Dollar Wise program and collaboration to network with non-profit community partners to launch creative financial learning projects. A dedication to encourage consumers to take charge of their finances and achieve success has been displayed by on-going consumer financial education outreach. Poverty reduction throughout Chatham County has been the focus of our countywide financial education network of community partners which Sun Trust has been an active partner.

We look forward to continue this working collaborative relationship offering financial education in partnership with our community business partners in the future with the support of the new financial institution resulting from the merger of SunTrust and BB&T.



Where do I begin, as a child when growing up in a poverty stricken neighborhood you tend to believe what you see around you is TRUE for everyone. I didn't realize we were a family looked at by society as poor, because I had love from my family. Although there were many times when there was no food, we still had love and that love is what sustained us and made us closer. However when you grow older you think about your past and wonder how did our parents keep us happy on such little – and you realize it's the love and determination to succeed that rings so loud in your ear. It's the ability to work together and to help others, it's the community coming together to make sure everyone is taking care of.

My upbringing is really no different than so many of the young less fortunate families today that live from paycheck to paycheck in the housing authorities, or the families that are putting the pieces of their lives back together after a traffic event, layoff, or discharge, or even the business owners that lost their business and had to close their doors and are looking for a way to make ends-meet. This is the inspiration that makes us passionate about what we do at the Women's Business Center of Charlotte. Our grassroots approach keeps us connected to the REAL families within our 12 County region (Anson, Alexander, Cabarrus, Catawba, Cleveland, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, Stanly, Union) and its partners like SUNTRUST through leadership with people like Matt Giddens that we get to help build the communities around us.

Through our partnership with SUNTRUST we are afforded the opportunity to help families get back on their feet through training and educational opportunities. We are honored to be an instrument of change through empowering, encouraging, and cultivating the talents, skills, and abilities needed to move their businesses forward. Our 90 plus FREE trainings offered throughout the year have had prodigious impact. With help from our supports and partners like SUNTRUST we have been able to provide over 1300 Entrepreneurs with professional and business training (i.e. HR Management, Financial Management, Legal Assistance, Capital Funding Training, Bonding, etc.), equating too approximately 4700hrs of training; as well as assist small business owners obtain over \$800K in capital. Financial support from partners like SUNTRUST give us the ability to offer our specialized trainings, conferences, and workshops, where we are building leaders through leadership and professional development, at a more feasible rate to business owners to enhance the capacity of their organizations.

Dreamers, pre-venture, startup, small business owners, stay-at-home moms looking to transition back into the workforce or marketplace, and women seeking support in navigating through Corporate America, seek out our services. If we are going to change the economic climate of our City, County, State, and Nation, we need partners and supporters like SUNTRUST. The Women's Business Center of Charlotte is truly grateful for the past year's support, commitment, and consistent engagement with SUNTRUST BANK and we are looking forward to our continued partnership with BB&T Bank; your leadership in demonstrating your pledge and promise to support small businesses is exuberated through the management and leadership teams and through the ongoing efforts, strides, and impact you so consistently make in our communities.

Below are some of the success stories that we would love to share with you – it would not have been made possible without your support.

Natalie Williams
The Women's Business Center of Charlotte

NARRATIVE STORY

Women's Business Center of Charlotte

STORY #1

Dr. LaTanya Bowman is a Chiropractic Physician and owner of Discovery Chiropractic and Wellness Center, PLLC. Dr. Bowman has been in the practice of making people feel better through chiropractic treatments for over a decade. Born and raised in Winston-Salem, North Carolina, Dr. Bowman received her Bachelor of Science Degree for Athletic Training from North Carolina Central University. During her work experience as an Athletic Trainer, she worked alongside leaders in the field, gaining experience at Duke University Athletic/Physical Therapy Department, and the Wake Forest University Athletic Department.

Dr. Bowman continued her education at Parker College of Chiropractic in Dallas, Texas, and received a second Bachelor of Science Degree in Anatomy and a Doctoral Degree in Chiropractic in August 2005

Throughout her experience of being a small business owner, it has come with many, sacrifices, challenges and rewards. As she has always stated to her mentees, "It's one thing being a Great Physician, it's another thing becoming a Great Business Owner", "That's the one missing piece they do not teach us in professional school, how to become a good business owner".

The Women's Business Center of Charlotte (WBCC) a resource organization funded by the SBA has helped with this, allowing me the guidance with my business, showing me the direction I need to go in order to continue to move forward with my endeavors and growth for my practice. They are a fantastic support system. Giving small businesses access to all the tools they need for growth. From the counseling services, to the access of computers, business seminars/classes, networking and resource material you have no reason not to be successful in your business and professional goals. Since we have participated with WBCC, we have enhanced our relationships with Community leaders and Business owners by 100%. Since my participation in training, workshops and seminars with WBCC my company has seen significant organizational growth, we have modified our strategies, put into place new practices policies and new hiring procedures. This attention to detail has allowed our company the ability to reach a large scale of clients.

The WBCC and Small Business Association is a necessity for small business growth. "It helps you to realize you are not alone.

Dr. LaTanya Bowman
Discovery Chiropractic and Wellness Center, PLLC

STORY #2

To whom it may concern:

When I first decided I wanted to potentially open a business, I was referred to the women's business Center as a resource from a fellow female entrepreneurial spirit and small business owner. When I first emailed the women's business Center and set up a meeting to meet with Cynthia Neely, I was immediately greeted with enthusiasm, excitement, support, and loads of information to get me started on this journey. The women's business Center gave me the tools and resources that I needed to navigate through the uncharted territory of starting a new business. I was able to attend a workshop to learn business fundamentals, where I was surrounded with fellow female entrepreneurs, in a safe environment to share ideas, brainstorm, and troubleshoot.

I have been extremely impressed with the support, love, and positive energy I received every step of the way. Once I was ready, hitting the financial aspect of my start up, I was directed to meet with Natalie Williams, who again greeted me with loads of energy and enthusiasm. Numbers are not my strong suit, so this was definitely the most intimidating aspect of starting a business. Natalie gave me the confidence, inspiration, and guidance to feel I had the skills and ability to actually bring this vision to fruition. She held me accountable, kept me on track, gave me wonderful bits of information; one of the best things she told me was "don't put the cart before the horse," and I keep thinking about that over and over again as my business is now up and running.

Whenever someone asked me how I got started, I always recommend the women's business Center, it was my first point of contact, and honestly I'm not sure I would have followed through with this if I had not had their help and support.

This resource is extremely important for the community; women need to know they too can succeed and have a piece of the pie, but there are steps to take to get there. It can be intimidating navigating through male-dominated industries, but having a group of women to help support you along the way and give you feedback and advice is extremely valuable. I will forever be grateful and indebted to the Women's Business Center for their continued support for me and my new business.

Lauren C. Childs
Founder, Owner, and Manager
Ebb & Flow Movement Studio LLC

STORY #3

The Women's Business Center of Charlotte (WBCC) is a wonderful resource for women owned businesses. The variety of resources and connections offers something for everyone. The staff is able to help you articulate the core of your business issue and then point you in the right direction to solve the problem. October, 2017. I enrolled in the Women's Advantage Program to help me create a solid business foundation. To grow, I needed to systematize my processes. The program introduced me to other women, sparked new ideas, find resources and information that gave me what I needed.

As a result, I clarified my niche, now understand what is of value to my customers, improved my service delivery processes with them in mind and began learning about setting up a more predicible sales funnel. 10 months later, a 77% increase in speaking engagements and a 21% increase in net income. Based on those very plans, this year I can focus on reducing costs as I expand. The WBCC introduced me to another program that has put me on the road to writing my first book. Something that I resisted for a long time but now can see the value of doing so for my client companies. For me, it is one of my "go to" resources when it's time to answer my business building questions.

***Denise Cooper, Owner
Remarkable Leadership***



STORY #4

I have been an active WBCC member for 2 years. I have participated in several workshops which have impacted my business by 30% in 2018. Through expert information shared in workshops, one on one sessions with Natalie, my business has gained more clarity in vision and mission, understanding how and what the value of my package/product should be has all played a part in the increase in clients/sales. In 2019, my goal is to seek how to become scalable through the guidance and tools WBCC will offer ... I am already registered in February for 3 WBCC workshops that's assisting me with my 2019 goal of building my business to the next level.

***La Shanda Millner-Murphy
Owner of 3M Design***

STORY #5

Prior to learning of The Women's Business Center (WBCC) lead by Natalie Williams, my business should have been described as a hobby. Although in my mind I was a thriving Entrepreneur destined for great success.

As I attended my first class at WBCC, I soon realized that I had so much more to consider if I intended this business to have an impact in the community, be profitable and sustainable, versus just something to pay the cable bill.

I have always considered the training and counsel received by WBCC on the level if not higher than a master's degree. I learned quickly there was more work to do to simply to lay the foundation of my business. I came to WBCC with 2 ideas for business ideas that seemed so different and unrelated. WBCC showed me how to organize it into one great vision and mission.

Vision: By 2022 Build MHD Consulting into a \$500,000 National Wellness Education and Coaching Business that provides CPR, Health Education and Life Coaching Strategies to individuals and companies who desire healthier lives.

Mission: We empower individuals with essential Health, CPR and Wellness Programs.

Because of WBCC, I gained a great amount of exposure that increased my contracts, partnerships and increased revenue. I gained incredible business education, had opportunity to speak in public and create a relevant Business Logo. I launched my first Health Awareness Day in 2017. The voice of Health that was deep inside of me; came to the forefront and was heard and it will continue to be heard through continued Health Education initiatives. WBCC supported me as if I were their only client, providing me with excellence in business training and consulting.

***Phyllis Booze, President
MHD Consulting***

Lynchburg Community Action Group, Inc.

1010 Main Street • Second Floor • Lynchburg • Virginia • 24504

President/CEO
William J. Coleman

SERVING CENTRAL VIRGINIA

Affordable Rides

The Center for Employment
Training (CET)

Basic Computer Skills

Certified Nurse's Assistant

Employment Services

Medical Technician

Childcare

Free Tax EITC/VITA

The Gateway

The Hand Up Lodge
(Homeless Shelter)

Head Start

HOPWA

Housing Counseling Services

Fair Housing

Foreclosure Mitigation Counseling

Homebuyers Club

Homeless Prevention

Pre-Purchase

Rental Counseling

Housing & Community Development

Community Housing

Development Organization

Down Payment Assistance

Emergency Home Repair

Financial Literacy

Indoor Plumbing Rehab

Housing Rehabilitation

Homeowner Occupied

Housing Repair (HOME)

VA Homeless Solutions Program

Weatherization

Project Discovery

Rapid Re-Housing

Veteran Services

Virginia Cares

April 11, 2019

Federal Reserve Bank of Richmond
ATTENTION: SunTrust /BB & T Merger
P.O. Box 27622
Richmond, VA 23261

RE: Letter of Support for SunTrust/BB & T Merger

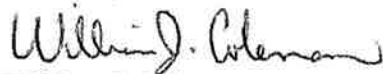
On behalf of the Board of Directors of Lynchburg Community Action Group, Inc. (LynCAG), I am submitting our Letter of Support for the merger of SunTrust and Branch Banking and Trust Company (BB & T). Our nonprofit has benefited from its relationship with both financial institutions for a number of years and strongly believe that as a merged entity they will maintain a community focus, a strong customer service model, and a commitment to offer quality financial products to their clients.

SunTrust Bank has supported LynCAG's mission in a way that has made a positive impact on the lives of low-to-moderate income families. SunTrust has provided direct support by volunteering for a leadership position on our Board of Directors, by providing office space for LynCAG's administrative functions, and by providing volunteers to serve at community service events, and more.

BB & T Bank has also been a strong advocate and supporter of LynCAG's community functions and fund-raising events. BB & T staff members have partnered with us on numerous occasions to provide financial literacy trainings and homebuyer classes that have benefited individuals and families throughout our service area.

The Lynchburg Community Action Group stands in support of this merger and believes that combining of resources of these two great financial institutions will benefit the communities they serve. Thank you for providing our Agency with an opportunity to share our support of the SunTrust / BB & T merger.

Sincerely,



William J. Coleman
President/CEO



Tel: (434) 846-3174 www.lyncag.org Fax: (434) 845-1547

"Helping to meet the needs of people in Central Virginia"



Atlanta Police Foundation
191 Peachtree Street NE, Suite 191
Atlanta, GA 30303
www.atlantapolicefoundation.org
(404)586-0180

April 17, 2019

To Whom it May Concern:

Suntrust Bank has been a valuable partner to the Atlanta Police Foundation (APF) impacting the Atlanta community at large through their philanthropic efforts. APF established in 2003 to cement an alliance between the business community and the Atlanta Police Department (APD) by creating an infrastructure of resources and support for those charged with serving and protecting our great city and its citizens. In partnership with the City of Atlanta and the Atlanta Police Department, APF leads the city's strategic vision for crime prevention and response and secures private resources to fund projects designed to enhance the effectiveness of the police department. APF has garnered national attention as a model for a successful public-private partnership dedicated to public safety. As a result, we are experiencing a 50 year low in crime with crime rates having decreased by 46% throughout the city since 2003.

Suntrust has been a critical partner and funder of the Atlanta Police Leadership Institute (APLI) program. SunTrust provides the tools and information that APD officers need to make smart decisions along the path to financial well-being. SunTrust's Financial Literacy Training is an important aspect to Leadership Training for the entire department, with their programming being offered APD-wide. The APD officers selected for APLI receive customized programming and instruction from SunTrust experts as part of the APLI curriculum for Tiers 3 (Sergeants) and 4 (Lieutenants). The modules cover topics tailored to the challenges officers face today and help develop the future leaders of APD. SunTrust's team has put together a critical module on understanding what financial integrity is and how to look for signs of potential issues within their department or within their subordinates. These themes will be covered over two sessions for a total of four (4) hours of learning.

In addition, Suntrust has been a prominent supporter of our annual Signature Events since 2009. We are truly thankful for our continued partnership with Suntrust Bank and the Suntrust Foundation. If you have any questions, please don't hesitate to contact me directly at 404-586-0180 or mburgess@atlantapolicefoundation.org.

Kind Regards,

Meghan Burgess
Vice President of Development
Atlanta Police Foundation

Eike, Kathy

From: Ryan Rosa <ryan@tinotile.com>
Sent: Friday, April 19, 2019 3:27 PM
To: RICH BankSup Applications Comments
Subject: [External] BB&T / SunTrust Merger - YES

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My business has been able to meet its full potential with Rob Betler's guidance and his team of industry specialists with BB&T. We have taken advantage of the many opportunities offered by BB&T with traditional business banking products, Insurances, Credit access and Business Continuation Planning.

I am in full support of the merger as the increased capabilities will help small businesses, individuals and communities continue to grow.

Ryan K. Rosa
President / CEO
Tino Tile & Marble Co. Inc.

P: 704-636-7735

Eike, Kathy

From: David Fisk <dfisk@richmondsymphony.com>
Sent: Friday, April 19, 2019 3:36 PM
Cc: RICH BankSup Applications Comments; baNKMERGERAPPLICATION@fdic.gov
Subject: [External] RE: In support of the SunTrust / BB&T merger

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To whom it may concern:

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Let me please add my voice, on behalf of our organization, in support of the SunTrust / BB&T merger. SunTrust in particular is a major supporter of the Richmond Symphony and of our programs that promote quality of life and educational opportunities for the Richmond region???'s citizens and children. The Bank has been a sponsor for many years, and its executives have frequently served in leadership positions on our Board and Foundation, including today. SunTrust teammates are parents of students in our youth orchestras, they sing in our chorus, serve in our volunteer league and of course number many in our audiences and donor base. We benefit too from the Bank???'s generous matching gift program. Viewing the Symphony as merely one among the 100s of non-profits that benefit each year from the Bank???'s support in this region, our example demonstrates that SunTrust is firmly embedded in this community as a corporate leader and exemplary employer, whose presence and impact for good would simply be strengthened by the merger.

??

Sincerely,

??




??

David J.L. Fisk
Executive Director
Richmond Symphony
612 East Grace Street, Suite 401
Richmond, VA?? 23219
??

t: (804) 788-4717 x 101

f: (804) 788-1541

www.richmondsymphony.com

???? ???? ??????????

?? _____ ??????

Richmond Symphony at West Creek

Wednesday, April 24, 2019 at 6:30pm | [Click here to purchase tickets!](#)

Hardywood West Creek, 820 Sanctuary Trail Dr.????????

Join the Richmond Symphony for a concert at Hardywood West Creek, and show your support by donating to our music education programs in Goochland County Public Schools.

??

Rush Hour at Hardywood

Thursday, April 25, 2019 at 6:30pm | [Click here to purchase tickets!](#)

Hardywood Park Craft Brewery

Enjoy your favorite craft beer during a laid back Richmond Symphony concert in Hardywood's tasting room.

??

Metro 4: Copland, Spohr & Schubert

Sunday, April 28, 2019 at 3pm | [Click here to purchase tickets!](#)

Randolph-Macon College

Join the Richmond Symphony for an intimate concert featuring David Lemelin, clarinet, with music from our classical repertoire.

??

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Gerald R. Sigal
CCS | SIGAL

Michael Sigal
CCS | SIGAL

Rev. Stephen Tucker
JOBS Coalition

April 19, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, Virginia 23161
comments.applications@rich.frb.org

Federal Deposit Insurance Corporation
Ten 10th Street, N.W., Suite 800
Atlanta, Georgia 30309-3849
BankMergerApplication@fdic.gov

Re: Proposed Merger of BB&T Bank and SunTrust Bank

Ladies and Gentlemen:

The District of Columbia Students Construction Trades Foundation ("Foundation" or "DCSCTF") (<http://dcstudentsctf.org/>) is pleased to submit these written comments to the Federal Reserve Bank of Richmond and the Federal Deposit Insurance Corporation Regional Office of Atlanta, Georgia, in connection with the proposed merger of BB&T Bank and SunTrust Bank.

Established in 2005, the Foundation is a partnership of business and community leaders primarily located in the District of Columbia region (<http://dcstudentsctf.org/foundation/leadership.htm>) whose objective is to return and support skilled trades learning to public schools and generate renewed interest in career and technical education (CTE) as a viable pathway to work, college and careers. DCSCTF has designed three programs around this objective: the Academy of Construction and Design (ACAD); the DC Apprenticeship Academy; and Adult Education.

The ACAD program has been and is co-located with the public schools of the District of Columbia. Currently housed at the IDEA Public Charter High School in Ward 7, ACAD presents its skills training efforts through a series of instructional modules approved by the National Center for Construction Education and Research (NCCER). Its curriculum is equivalent to Level 1 pre-apprenticeship training and is offered to students in grades 10-12, as well as introductory classes and activities for ninth graders.

One of the key features distinguishing the Academy of Construction and Design is its hands-on skills project "*Build a House – Build a Future.*" Begun in 2010, the program includes construction of a house by the students under the supervision of industry tradesmen/tradeswomen employees of leading industry training partners. Through this program, Academy students constructed a 2,000 square-foot, single-family house sold at market rate as well as two micro homes featured in a recent demonstration project with the DC Department of Housing and Community Development showcasing the possibilities of "tiny house" construction and sustainable living.

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April 19, 2019 -- page 2

Letter to Federal Reserve Bank of Richmond and Federal Deposit Insurance Corporation

Our DC Apprenticeship Academy offers “related instruction” (i.e., required classroom curriculum) for apprentices who are currently employed in the construction industry and registered with the DC Office of Apprenticeship Information and Training. Additionally, the Foundation provides technical assistance and instructor certification to nonprofit organizations offering pre-apprenticeship adult job training in the Washington D.C. area.

The Foundation believes Career and Technical Education (or vocational education) is a much-needed opportunity for young people nationwide *and particularly in urban school settings*. Continued adherence to the all-too-familiar mantra of “college for everyone”, so often purveyed as the universal goal in most academic circles, marks a disservice to the eighty percent of high school graduates who will follow alternate paths to postsecondary credentials. We must also concern ourselves with helping students translate their demonstrated aptitudes into gainful employment. Skilled trades offer pathways to such gainful employment and need to be encouraged.

The programs of instruction presented by the Foundation offer the early pathways to gainful employment and profitable careers which can carry on for a lifetime. All of these programs from the Foundation are being advanced through the generous support of SunTrust Bank through its Community Reinvestment Act undertakings. This support from SunTrust points to their understanding of the need to advance a more expansive educational opportunity for young people through Career and Technical training in our communities – and it fits squarely within the statutory obligation for community reinvestment.

The Foundation hopes and trusts that this understanding by SunTrust will continue to occupy a place of attention and action within the combined banking entity being considered in this merger.

Accordingly, the DC Students Construction Trades Foundation gives our strongest endorsement and support to the SunTrust/BB&T merger.

Sincerely,

John M. McMahon
President



April 19, 2019

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

To Whom It May Concern:

I would like to take this opportunity to share with you how SunTrust has been a key supporter of our organization. Their support provides 2800 kids and teens across the Chattahoochee Valley membership at our 5 locations, opening the door for them to learn and grow in a safe and caring environment. We are thankful for SunTrust's financial gifts and ongoing support and advocacy of our organization.

Members turn to their Clubs to help them accomplish success in school, leadership in their community and new healthy habits. At BGCCV we believe every child has the potential to be great and have a better tomorrow. Our programs advance kids minds, character, health and leadership skills so they may thrive as adults. With love, support and stability greeting them at the door, members are given a solid foundation for success.

The SunTrust Foundation is a gracious supporter of our Money Matters Program which ensures that over 2,800 youth receive Financial Literacy programming each year. This program provides Club members with education around critical Money Management Skills such as Budgeting, Saving, and Financial Planning for Post-Secondary Education. This program has been successful in equipping our Club members with critical fiscal management skills that have supported them well into adulthood.

As a customer from the banking and investment side, we could not be more pleased with the support and guidance from SunTrust. SunTrust has loyally supported our Youth of the Year and Polo Cup, which combined have raised over \$2million to support our programs. As a board member, Jerry Coleman, President, SunTrust Bank West Georgia, is invested in what we do. He has been an excellent addition to our board and can be counted on for ongoing support and commitment to our organization.

We are extremely grateful for the support of SunTrust and look forward to continuing this successful partnership into the future.

Sincerely,



Rodney Close
President & CEO

Boys & Girls Clubs of the Chattahoochee Valley



BOYS & GIRLS CLUBS
OF THE CHATTAHOOCHEE VALLEY

1700 Buena Vista Road
Columbus, GA 31906
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GREAT FUTURES START HERE.



Eike, Kathy

From: dan ward <danward63@gmail.com>
Sent: Friday, April 19, 2019 4:25 PM
To: RICH BankSup Applications Comments
Subject: [External] BB&T and SunTrust merger

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PLEASE NOTE: This email is not from a Federal Reserve address.
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I am a corn, peanut, and soybean farmer in Southeastern North Carolina. I have been involved with BB&T as my financial partner for over 12 years now. They have financed real estate, farm equipment, and my home. BB&T has provided me with an operating line of credit that allows me flexibility in the ever changing world of agriculture.

I do support this merger and I see the new entity being a strong financial partner.

Dan Ward
910-640-7357

Eike, Kathy

From: ricky@blackstire.com
Sent: Friday, April 19, 2019 4:37 PM
To: RICH BankSup Applications Comments; bankmergerapplication@fdic.gov
Subject: [External] BB&T Letter 4-19-19
Attachments: BB&T Letter 4-19-19.pdf

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30 Bitmore Drive PO Box 919 Whiteville, NC 28472 910-642-4123 Fax: 910-642-5362

April 19, 2019

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

To Whom It May Concern:

My name is Rick Benton with Black's Tire Service. We are in the tire and automotive business with over 50 locations in the Carolinas. We also are a wholesale distributor that services NC, SC and Southern VA. Our company, started in 1929, has been in business for over 90 years. We believe strongly in business relationships and value our current relationship with BB&T and the team they have here in our area. We have been doing business with Evan Gore now for many years and the relationship is key to our banking relationship and business needs.

At first, when first hearing about the merger with Sun Trust, we were concerned that we might lose this local bank feel but after researching both banks and history we now see where this can help our business needs for the future. We fully support the merger and believe this will continue to be big for our communities and growth for the future.

Thanks for your time and if you have any questions I would be glad to answer.

Sincerely,

Ricky Benton II
TEAM BTS



April 19, 2019

To: Federal Reserve Bank of Richmond and the Federal Deposit Insurance Corp.

On behalf of the B&O Railroad Museum located in Baltimore, Maryland, I would like to express our support for the BB&T and SunTrust merger. This is a union of two highly committed community-oriented institutions. By joining together, the impact of their community investments will be leveraged benefitting the citizens and the cultural/community institutions that serve them.

SunTrust and BB&T are key to helping our institution contribute to economic development of at-risk communities in Baltimore and Washington, DC. This merger will hopefully expand resources to invest in educational programs and other crucial initiatives that our communities need to become economically vibrant.

We support the merger of BB&T-SunTrust for the betterment of the communities that we serve in Maryland. If you have any questions, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink that reads "Kris A. Hoellen". The signature is written in a cursive, flowing style.

Kris A. Hoellen
Executive Director
B&O Railroad Museum



301 North Holtzclaw Avenue
Chattanooga, TN 37404

P 423.697.1322
F 423.697.1329
www.chattzoo.org

April 19, 2019

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

To Whom it May Concern:

The Chattanooga Zoo and SunTrust Bank have a relationship that began almost 20 years ago, when the SunTrust Foundation provided a major donation to help with an ambitious new exhibit for the Zoo, Gombe Forest. This project really took the Zoo to a new level.

In subsequent years, the Zoo reached out to ask for a new partnership with SunTrust. The Zoo designed a diversity workforce program called PEDZ (Promoting Ethnic Diversity in Zoos) to create summer jobs for underserved minority students at the zoo. Every summer, 16-20 high school students are accepted into the 8 week employment program. Funds from the SunTrust Foundation have allowed us to make the program stronger and include involvement with the local SunTrust employees to help with understanding how to better manage money. This partnership has made a difference in the lives of children desperately in need of nurturing and encouragement.

In addition to the above partnerships, the Zoo has always been able to count on SunTrust to sponsor some of our fundraising and educational events. We are grateful for the support from all of the different facets of SunTrust. The SunTrust logo may be found throughout our community, working with countless organizations to help provide a better quality of life for our citizens. With the merger with BB&T, we are confident that partnership will enhance both the entities involved as well as the communities they serve.

Sincerely,

Dardenelle Long, CEO

Eike, Kathy

From: Lee A Gill, J.D. <lagill@clemson.edu>
Sent: Saturday, April 20, 2019 9:19 AM
To: RICH BankSup Applications Comments
Subject: [External] SunTrust Comments

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To Whom it May Concern,

SunTrust has been a staunch supporter of Clemson's initiative to graduate more African American and Hispanic males from high school, prepared for college and ultimately adding to the talent dividend of the Upstate and South Carolina.

The Tiger Alliance initiative works with 400 first generation lower socio-economic young men beginning in the 9th grade until they graduate from high school. And each year a new crop of 9th graders enter the program. Students from identified schools in Greenville, Anderson, Spartanburg, Pickens and Oconee counties are the geographic areas because of low graduation rates.

The initiative provides the students with mentors and a week long summer bridge program on Clemson's campus where they interact with faculty and staff from our seven colleges. And are introduced to new career opportunities, role models and gain awareness of college culture discipline.

SunTrust has been a supporter of the Tiger Alliance program since the inception, not only with dollars but providing mentors to teach financial literacy.

SunTrust, like Clemson understands the importance of economic mobility for all the citizens of the Upstate. And I commend their efforts as an outstanding corporate partner.

LEE A. GILL, J.D.

CLEMSON UNIVERSITY

DIVISION OF INCLUSION AND EQUITY
Chief Inclusion Officer and Special Assistant
to the President for Inclusive Excellence
223 Brackett Hall
Clemson, SC 29634
864.656.4238
lagill@clemson.edu

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while linking the quality of the educational experience.*

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1905 Chapel Hill Road, Durham, NC 27707
www.durhamliteracy.org 919.489.8383

April 18, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261
comments.applications@rich.frb.org

To Whom It May Concern:

On behalf of our board of directors, I express the Durham Literacy Center's support of the merger between SunTrust and BB&T.

SunTrust Bank has been the Durham Literacy Center's banker since 2004 (starting with CCB). For the last 15 years, whenever DLC needed help, we have been able to count on SunTrust. We have enjoyed personal banking representatives, hard-working volunteers and help with planning, special events, facilities, funding and sponsorships.

When mold forced DLC to vacate our headquarters in 2007, SunTrust provided "temporary" office space that lasted several years. In the troubled economy of 2009, DLC launched a capital campaign knowing we would need a mortgage to achieve our goals. All banks except SunTrust asked for detailed guarantees we couldn't provide. SunTrust took us on faith, however, and provided the loan we needed. In 2017 we paid off our mortgage and are far more fiscally sound thanks to SunTrust. The SunTrust Foundation even sponsored a room in our building. Today, thanks to SunTrust, DLC owns a facility valued at \$1.6 million, has eight partner sites and is a recognized leader in adult literacy in North Carolina.

In 2016, the Durham Literacy Center recognized SunTrust as our 9th Annual Leader in Literacy Award winner. We give this award to an individual or organization that has helped Durham residents reach their literacy goals and promoted literacy in other geographic areas.

Please let me know if you have any questions or require further comment.

Sincerely,

Lizzie Ellis-Furlong
Executive Director



April 22, 2019

Michael J. Dean
Acting Regional Director
Federal Deposit Insurance Corporation
10 Tenth Street, NE, Suite 800
Atlanta, GA 30309

Adam M. Drimer
Assistant Vice President
Federal Reserve Bank of Richmond
701 East Byrd Street
Richmond, Virginia 23219

Re: The National Black Farmers Association's Objection to proposed acquisition and merger of *SunTrust Banks, Inc. and BB&T Corporation*

Dear Acting Regional Director Dean and Assistant Vice President Drimer,

On behalf of the National Black Farmers Association ("NBFA"), we urge the members of the Board of Governors for the Federal Reserve System ("Board" or "Fed") and the Federal Deposit Insurance Corporation ("FDIC") to reject BB&T Corporation's ("BB&T") proposed acquisition of SunTrust Banks, Inc. ("SunTrust") and its proposed merger of SunTrust with Branch Banking and Trust Company, North Carolina ("Branch Bank"), a subsidiary of BB&T. The two agencies are charged with the critical task of reviewing the acquisition and merger

between SunTrust and BB&T to assess anticompetitive effects under U.S. antitrust laws, and regulations such as the Community Reinvestment Act.¹

The proposed acquisition and merger of SunTrust and BB&T would be the largest since the 2008 financial crisis and it would create the sixth-largest bank in the United States.² The NBFA is concerned that the proposed merger will increase concentration in specific markets in the Southeastern United States—especially in communities in Virginia, Georgia, and Florida—where over 220,000 farmers reside.³ The combined firm would be the largest in the combined markets of these three states.

In local communities the impact will be more intense. In the following metropolitan statistical areas (“MSAs”), the merged firm will have over 20% market share: Atlanta-Sandy Spring-Roswell, GA; Charlottesville, VA; Deltona-Daytona Beach-Ormond Beach, FL; Durham-Chapel Hill, NC; Homosassa Springs, FL; Macon-Bibb County, GA; Roanoke, VA; Staunton-Waynesboro, VA; Virginia Beach-Norfolk-Newport News, VA; and Winston, Salem, NC. In one of these communities, Winston, Salem, NC, the resulting increase in market share will be “presumed to likely increase market power” according to the U.S. Department of Justice & FTC Guidelines, measured through the Herfindahl–Hirschman Index (“HHI”).⁴ The

¹ Bank Holding Company Act of 1956, 12 U.S.C § 1842(b), *et seq.*; 12 C.F.R. § 225.13 (Factors considered in acting on bank acquisition proposals); 18 U.S.C. § 1828 (c)(5).

² Rachel Louis Ensign & Allison Prang, *BB&T to Buy SunTrust in Largest Bank Deal Since the Financial Crisis*, The Wall Street Journal (Feb. 7, 2019), <https://www.wsj.com/articles/suntrust-bb-t-to-combine-in-all-stock-merger-11549537817>.

³ *Census of Agriculture – 2017 Census by State*, U.S. Department of Agriculture, https://www.nass.usda.gov/Publications/AgCensus/2017/Full_Report/Census_by_State/index.php (search by State).

⁴ U.S. Department of Justice & FTC, Horizontal Merger Guidelines, § 5.3 (2010).

increased concentration in these MSAs will enhance the ability and incentive for the merged entity to exercise market power, likely leading to anticompetitive effects in the commercial banking and mortgage lending markets, as well as creating a merged bank that is less responsive to the needs of the local communities it serves.⁵

Furthermore, in rural and economically disadvantaged areas the merger will have disproportionate effects, such as shuttered branch offices and reduction in staff that oversee compliance with the Community Reinvestment Act (“CRA”). Indeed, the NBFA also has serious concerns about the combined firm’s compliance with the CRA, which protects NBFA members and other economically vulnerable and disadvantaged communities.

Interests of the National Black Farmers Association

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. SunTrust received \$50,000 from the settlement in the *In re Black Farmers Discrimination Litigation* in connection with

⁵ Rachel Louis Ensign & Allison Prang, *BB&T to Buy SunTrust in Largest Bank Deal Since the Financial Crisis*, The Wall Street Journal (Feb. 7, 2019), <https://www.wsj.com/articles/suntrust-bb-t-to-combine-in-all-stock-merger-11549537817>; Matt Kempner & J. Scott Trubey, *SunTrust combination with BB&T means changes for customers*, The Atlanta Journal-Constitution (Feb. 7, 2019), <https://www.ajc.com/news/local/suntrust-combination-with-means-changes-for-customers/e0GN1UYY4wJGd9WWhWaty.I/> (“None of the banks with the five biggest metro Atlanta footholds — and a combined 70 percent of deposits — will be based locally.”).

creating a Qualified Settlement Fund to distribute the settlement, which substantially benefitted NBFA members.

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 such as SunTrust and BB&T 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 SunTrust or BB&T. As of 2017, there were 45,508 Black farmers located throughout the United States, with most residing in the Southeastern United States and having an average of 61.3 years old.⁶ There are thousands of NBFA members and Black farmers residing in the states most heavily impacted by the SunTrust and BB&T merger:

State	NBFA Members	Black Farmers⁷
Florida	3,976	2,299
Georgia	6,882	2,773
North Carolina	10,529	2,041
South Carolina	12,311	2,570
Virginia	6,402	1,693

⁶ 2017 Census of Agriculture, U.S. Department of Agriculture (Apr. 2019), https://www.nass.usda.gov/Publications/AgCensus/2017/Full_Report/Volume_1,_Chapter_1_US/usv1.pdf.

⁷ *Id.*

The concerns of Black farmers are not in isolation. Independent small farmers in general also have problems accessing credit, and certainly face similar market pressures with regard to increased farming costs and a decreasing ability to fund their livelihoods. The NBFA is deeply troubled by the consequences that a merger between BB&T and SunTrust will bring to its members and to the local communities affected by the proposed merger. For example, if this merger is approved, none of the banks in Atlanta that account for 70% of the city's deposits will be based in that city.⁸

The Acquisition and Merger is a Harbinger of Further Consolidation

It is widely anticipated that the acquisition and merger will set in motion a wave of consolidation in the banking industry.⁹ Creeping concentration presents the risk that banking markets will become highly concentrated through successive mergers.

Regulators such as the Fed and FDIC should draw a line. If this proposed acquisition and merger is approved, large financial institutions in the United States will be emboldened to pursue further consolidation in already concentrated markets. This will be especially true if there are no modifications, or conditions, set by either agency.

In a letter to Board Chairman Jerome Powell on February 7, 2019, Senator Warren noted that from 2006 to 2017, the Federal Reserve System approved 3,316 of 3,819 merger applications (or 86.8%) and that during this same time period, it did not deny a single merger

⁸ Matt Kempner & J. Scott Trubey, *supra* note 4 (“None of the banks with the five biggest metro Atlanta footholds — and a combined 70 percent of deposits — will be based locally.”).

⁹ Brooke Sutherland, *BB&T Solves Jamie Dimon's 'Too Many Banks' Problem*, Bloomberg (Feb. 7, 2019), <https://www.bloomberg.com/opinion/articles/2019-02-07/bb-t-suntrust-merger-may-start-wave-of-bank-consolidation>.

application.¹⁰ Senator Warren stated: “The Board’s record of summarily approving mergers raises doubts about whether it will serve as a meaningful check on this consolidation that creates a new too big to fail bank and has the potential to hurt consumers.”¹¹

The Acquisition and Merger is Likely to Have Serious Anticompetitive Effects In Communities in the Southeastern United States

Merger review of financial institutions should ensure that “undue concentrations are prevented in specialized investment banking product lines as well as in localized commercial banking markets.”¹² Governing regulations require the regional impact of the proposed merger to be closely examined. The Board should reject any proposed acquisition that “would result in a monopoly or would further any combination or conspiracy to monopolize, or to attempt to monopolize, the business of banking *in any part* of the United States.”¹³ Similarly, an acquisition should be rejected if “[t]he effect of the transaction may be substantially to lessen competition *in any section of the country*, tend to create a monopoly, or in any other manner be in restraint of trade, unless the Board finds that the transaction’s anti-competitive effects are clearly outweighed by its probable effect in meeting the convenience and needs of the

¹⁰ Letter from Senator Elizabeth Warren to Jerome H. Powell, Chairman of Board of Governors of the Federal Reserve System, (Feb. 7, 2019), [https://www.warren.senate.gov/imo/media/doc/2019.02.07%20Letter%20to%20Chairman%20Powell%20re%20Bank%20M&A\[2\].pdf](https://www.warren.senate.gov/imo/media/doc/2019.02.07%20Letter%20to%20Chairman%20Powell%20re%20Bank%20M&A[2].pdf).

¹¹ *Id.*

¹² F.M. Scherer, *Financial Mergers and Their Consequences* (Harvard Kennedy School of Government, Working Paper No. RWP13-019, 26, June 2013).

¹³ 12 C.F.R. § 225.13(a)(1) (emphasis added); *see also* 18 U.S.C. § 1828 (c)(5)(B) (requiring the reviewing agency to reject a merger where “whose effect in any section of the country may be substantially to lessen competition, or to tend to create a monopoly, or which in any other manner would be in restraint of trade, unless it finds that the anticompetitive effects of the proposed transaction are clearly outweighed in the public interest by the probable effect of the transaction in meeting the convenience and needs of the community to be served.”).

community.”¹⁴ Precedent under Section 7 of the Clayton Act similarly considers localized effects of banking merger activity, down to the municipal level.¹⁵ The Fed should consider these concerns in its review.

Increased concentration and the enhanced ability and incentive to exercise market power that accompanies it disadvantages consumers because it generally results in lower interest rates paid on deposits, and less favorable financing terms.¹⁶ Enforcement of antitrust laws has an observed correlation to higher deposit interest rates.¹⁷ Thus there is a direct tie between reduced concentration of market power due to enforcement of antitrust laws, and increased interest rates on deposits for consumers and small businesses.

In the case of SunTrust and BB&T, regulatory scrutiny of the anticompetitive effects across the geographic markets in which SunTrust and BB&T formerly competed is necessary, especially with respect to the Southeastern United States, and in particular the states of Florida, Georgia, and Virginia.

Commercial Banking: the combined firm will be the sixth largest bank in the United States measured by deposits. The regional impacts would be more severe. The combined firm would be the largest in the combined markets of Florida, Georgia, and Virginia, according to

¹⁴ 12 C.F.R. § 225.13(a)(2) (emphasis added).

¹⁵ *U.S. v. Philadelphia Nat'l Bank*, 374 U.S. 321, 357 (1963) (“The proper question to be asked in this case is not where the parties to the merger do business or even where they compete, but where, within the area of competitive overlap, the effect of the merger on competition will be direct and immediate.”).

¹⁶ Kempner & Trubey, *supra* note 5 (providing the following quote from Greg McBride, the chief financial analyst for Bankrate.com: “What we have noticed in the past . . . is that with concentrated market share tends to mean less favorable pricing for consumers, less competitive deposit rates and less competitive pricing for many loans.”).

¹⁷ Jack Libersohn, *How Does Competition Affect Bank Lending? Quasi-Experimental Evidence from Bank Mergers* (Dec. 2, 2017), http://web.mit.edu/libers/www/libersohn_jmp.pdf.

data published by the FDIC, with 15.5% of the deposits as of June 30, 2018.¹⁸ In Georgia, the combined firm will be the largest bank, with 26.73% of deposits.¹⁹ In Virginia, the combined firm will be the second largest, with 13.67% of the deposits.²⁰ One can expect that lower deposit rates, higher interest rates and less favorable financing terms will follow.

The Department of Justice's Merger Guidelines states that "Mergers resulting in moderately concentrated markets that involve an increase in the [HHI] of more than 100 points potentially raise significant competitive concerns and often warrant scrutiny."²¹ The Guidelines note that in "highly concentrated" markets "an increase in the HHI of between 100 points and 200 points potentially raise significant competitive concerns and often warrant scrutiny," and "an increase in the HHI of more than 200 points will be presumed to be likely to enhance market power." Many markets when viewed from an MSA perspective will result in significant concentration, and increases of 100 or more in HHI, due to the merger (Please see Appendix A for further demographic information regarding the referenced MSAs):

- ATLANTA-SANDY SPRINGS-ROSWELL, GA: the merged firm will be the largest in the market with over 32%, and the HHI will cross the "moderately concentrated" threshold from 1476 to 1748, resulting in an increase in HHI of

¹⁸ Deposit Market Share Report, FDIC, <https://www5.fdic.gov/sod/sodMarketBank.asp?barItem=2> (search all counties in Florida, Georgia, and Virginia).

¹⁹ *Id.* (search all counties in Georgia).

²⁰ *Id.* (search all counties in Virginia).

²¹ U.S. Department of Justice & FTC, *supra* note 4.

272.²² As of 2017, there are 13,731 farmers residing in the counties where this MSA is located—339 of these farmers are Black or African American.²³

- CHARLOTTESVILLE, VA: the merged firm will be the largest in the market, with over 27%, and the HHI will cross to the “moderately concentrated” threshold from 1468 to 1837, resulting in an increase in HHI of 369. As of 2017, there are 3,785 farmers residing in the counties where this MSA is located—66 of these farmers are Black or African American.
- DELTONA-DAYTONA BEACH-ORMOND BEACH, FL: the merged firm will be the largest in the market, with nearly 28%, and the HHI will cross to the “modestly concentrated” threshold from 1361 to 1527, resulting in an increase in HHI of 166. As of 2017, there are 2,912 farmers residing in the counties where this MSA is located—50 of these farmers are Black or African American.
- DURHAM-CHAPEL HILL, NC: the merged firm will be the second largest in this already “modestly concentrated” market, with over 23% of the market. Here, the HHI will increase from 2197 to 2449, for an increase of 252. As of 2017, there are 3,352 farmers residing in the counties where this MSA is located—113 of these farmers are Black or African American.
- HOMOSASSA SPRINGS, FL: the merged firm will be the largest in this already “modestly concentrated” market, with nearly 31% of the market. Here, the HHI

²² Deposit Market Share Report, *supra* note 18 (search Metropolitan Statistical Area). All MSA deposit share data is obtained from this source.

²³ *Census of Agriculture – 2017 Census by State*, *supra* note 3 (search by State and County). All MSA demographic data is obtained from this source.

will increase from 1568 to 1760, for an increase of 192. As of 2017, there are 1,114 farmers residing in the county where this MSA is located—38 of these farmers are Black or African American.

- MACON-BIBB COUNTY, GA: the merged firm will be the second largest in this already “modestly concentrated” market, with nearly 28% of the market. Here, the HHI will increase from 1671 to 2054 will increase by 383. As of 2017, there are 1,385 farmers residing in the counties where this MSA is located—44 of these farmers are Black or African American.
- ROANOKE, VA: the merged firm will be the largest in the market, with over 31%, and the HHI will cross to the “moderately concentrated” threshold from 1358 to 1827, resulting in an increase in HHI of 468. As of 2017, there are 3,224 farmers residing in the counties where this MSA is located—42 of these farmers are Black or African American.
- STAUNTON-WAYNESBORO, VA: the merged firm will be the second largest in the market, with nearly 21%, and the HHI will cross to the “moderately concentrated” threshold from 1366 to 1563, resulting in an increase in HHI of 196. As of 2017, there are 2,880 farmers residing in the county where this MSA is located—4 of these farmers are Black or African American.
- THE VILLAGES, FL: the merged firm will be the second largest in the market, with over 14%, and the HHI will cross to the “highly concentrated” market threshold from 2489 to 2582, resulting in an increase in HHI of 93. As of 2017,

there are 2,165 farmers residing in the county where this MSA is located—58 of these farmers are Black or African American.

- VIRGINIA BEACH-NORFOLK-NEWPORT NEWS, VA-NC: the merged firm will be the largest in the market, with nearly 29%, and the HHI will cross to the “moderately concentrated” threshold from 1479 to 1891, resulting in an increase in HHI of 412. As of 2017, there are 2,687 farmers residing in the counties where this MSA is located—70 of these farmers are Black or African American.
- WINSTON-SALEM, NC: the merged firm will be the largest in this market, with over 77% of the deposits within this already “highly concentrated” market. Here, the HHI will increase from 5784 to 6092, for an increase in HHI of 308. As of 2017, there are 908 farmers residing in the county where this MSA is located—10 of these farmers are Black or African American.

The widespread increase in HHI across markets expressed by this data have practical effects. Empirical evidence shows a direct correlation between decreases in HHI associated with antitrust enforcement and increases in interest rates in bank deposits; in short, increased market concentration leads to worse economic terms for bank customers.²⁴

Mortgage Banking: the combined firm will have nearly 14% of the national mortgage banking market.²⁵ At the regional and local level, the impacts will be felt more directly. “The

²⁴ Libersohn, *supra* note 17.

²⁵ *Bb&t Corporation*, CSIMarket, https://csimarket.com/stocks/compet_glance.php?code=BBT (last visited Mar. 15, 2019); *Suntrust Banks Inc.*, CSIMarket, https://csimarket.com/stocks/compet_glance.php?code=STI (last visited Mar. 15, 2019).

combined company will be the second-largest regional bank in mortgages, with home loans making up 27% of the combined company's total lending, and commercial real estate loans accounting for another 12%.”²⁶

The aggregate impact on these lines of business are likely to be substantial, especially in Florida, Georgia, and Virginia, where many NBFA members earn their livelihoods. Because the mortgage and lending markets are localized, the merger will create acute anticompetitive effects on a community-specific basis, including the MSAs discussed above.

The Acquisition and Merger Will Likely Have Non-Price Anticompetitive Effects

Increased Entry Barriers: As demonstrated above, the merger will result in substantial increases in market concentration in at least eleven regional markets. This increase in concentration will result in increased entry barriers in these markets.²⁷ New entrants are less likely in concentrated banking markets.²⁸

Quality of Services: The merger is likely to result in a decline in the quality of services to NBFA members. Consolidation makes financial services less responsive to the communities they serve, and this is especially true with respect to loans to small businesses and consumers.²⁹

²⁶ Bonnie Sinnock et al., *5 ways mortgages will shape the BB&T and SunTrust merger*, National Mortgage News (Feb. 7, 2019) <https://www.nationalmortgagenews.com/list/5-ways-mortgages-will-shape-the-bb-t-and-suntrust-merger>.

²⁷ VICTOR J. TREMBLAY & CAROL H. TREMBLAY, *NEW PERSPECTIVES ON INDUSTRIAL ORGANIZATION*, “Market Structure, Industry Concentration, and Barriers to Entry” (Springer 2012).

²⁸ Timothy F. Bresnahan & Peter C. Reiss, *Entry and Competition in Concentrated Markets*, 99 JOURNAL OF POLITICAL ECONOMY 5 (1991).

²⁹ Robert B. Avery & Katherine Samolyk, *Bank Consolidation and the Provision of Banking Services: The Case of Small Commercial Loans* (Dec. 2000), <https://www.fdic.gov/bank/analytical/working/wp00-01.pdf> (“[A]s banks get larger and more organizationally complex, their business focus shifts to larger commercial customers or to more standardized types of loan products.”).

Lending in rural and farming communities is negatively impacted by consolidation.³⁰ Customer response surveys consistently show a decline in satisfaction following mergers or consolidation.³¹

Loss of Consumer Choice: Mergers such as the one between SunTrust and BB&T result in a loss of consumer choice, and reduce the incentive for banks to compete on features and services.³² Fewer major competitors will result in lessened competition among banks to offer attractive interest rates on deposits, and lending rates.³³

Innovation: The merger is part of a trend of consolidation that will reduce the incentive for innovation. In economic terms, innovation is measured by the introduction of new, substantially improved goods and services.³⁴ A substantial motivating factor in the merger is to increase investment in technology for the combined bank.³⁵ But it is a mistake to confuse increased reliance on digital banking with innovation. The benefits of technology are dubious to most consumers.³⁶ This is especially true for customers in rural locations, or customers who prefer (or require) personal service, as opposed to service by algorithms. In this regard, the aim

³⁰ *Id.*

³¹ David J. Urban & Michael D. Pratt, *Perceptions of banking services in the wake of bank mergers: an empirical study*, 14:2 JOURNAL OF SERVICES MARKETING 118—131 (2000).

³² Chris Isidore, *Here's why consumers have fewer choices than they used to*, CNN Business (Dec. 5, 2017) <https://money.cnn.com/2017/12/05/news/companies/corporate-consolidation/index.html>.

³³ Suzanne Martindale et al., *Trapped at the Bank: Removing Obstacles To Consumer Choice In Banking*, Consumers Union (May 20, 2012), <https://advocacy.consumerreports.org/wp-content/uploads/2013/09/TrappedAtTheBank1.pdf>.

³⁴ Robert E. Litan et al., IMPROVING MEASURES OF SCIENCE, TECHNOLOGY, AND INNOVATION: INTERIM REPORT, "Measuring Innovation" (The National Academies Press 2012), <https://doi.org/10.17226/13358>.

³⁵ Kristin Broughton, *BB&T-SunTrust Tie-Up Brings Tech Budgets Into Focus*, The Wall Street Journal (Feb. 7, 2019), <https://www.wsj.com/articles/bb-t-suntrust-tie-up-brings-tech-arms-race-into-focus-11549575429>.

³⁶ MyBankTracker, *5 Reasons Not to Use an Online Bank*, U.S. News & World Report (Aug. 24, 2012), <https://money.usnews.com/banking/articles/reasons-not-to-use-an-online-bank>.

of the merger appears to be replacing more costly customer services with technology, which is no substitute.³⁷ The Board and FDIC should carefully scrutinize any purported pro-competitive justification that relies on an increased investment in technology.³⁸

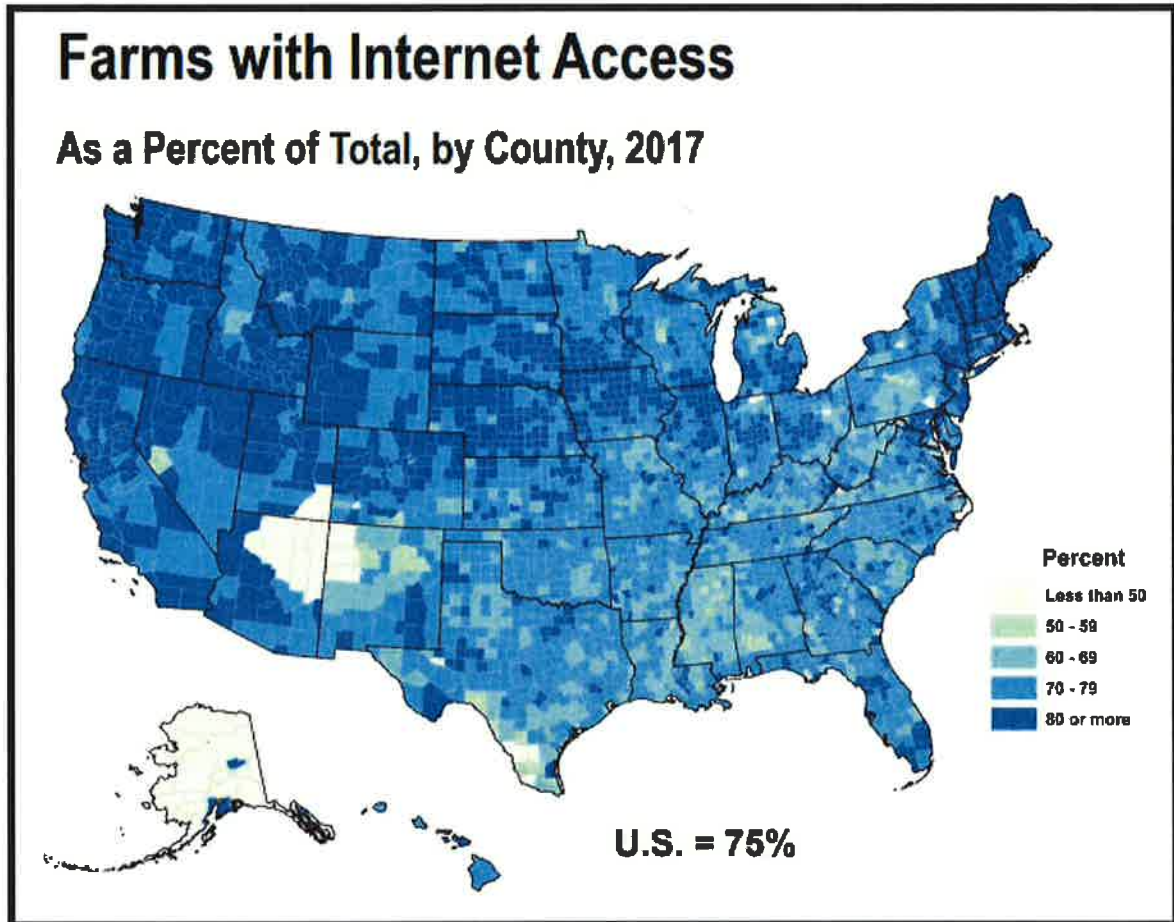
The procompetitive rationale that this merger will serve local communities with better technology may not apply to these constituents. Not all members of the communities that SunTrust and BB&T serve have Internet connections, or would be comfortable making personal financial transactions on electronic devices without personal service to explain the options and features that are available. Farmers in the Southern United States have limited access to the internet. In Florida, Georgia, and Virginia alone, there are 32,702 farms without internet access.³⁹ A map from the 2017 U.S. Census of Agriculture demonstrates that farmers in Southern U.S. have a lower rate of internet connectivity than elsewhere in the U.S.:⁴⁰

³⁷ Karen McDermott, *Striking a delicate balance: Technology should augment, not replace, human interaction in banking*, CIO (Sept. 6, 2018), <https://www.cio.com/article/3304237/striking-a-delicate-balance-technology-should-augment-not-replace-human-interaction-in-banking.html>.

³⁸ Kevin Smith, *Artificial intelligence will wipe out half the banking jobs in a decade, experts say*, The Mercury News (Apr. 23, 2018), <https://www.mercurynews.com/2018/04/20/artificial-intelligence-will-wipe-out-half-the-banking-jobs-in-a-decade-experts-say/>.

³⁹ *2017 Census of Agriculture*, *supra* note 6.

⁴⁰ *2017 Census of Agriculture Data Release*, U.S. Department of Agriculture, at 24 (Apr. 11, 2019), https://www.nass.usda.gov/Newsroom/Executive_Briefings/2019/04-11-2019.pdf.



Thus, if the merger results in more banking services moving online, farmers in these Southern States will not have equivalent access to the merged bank's services. Further, Black farmers will be disproportionately affected by this proposal to move services online. Only about 61 percent of Black farmers have access to internet.⁴¹

⁴¹ Mario Parker, *More Black U.S. Farmers, But Fewer Own Land or Earn Top Income*, Bloomberg (Apr. 11, 2019) <https://www.bloomberg.com/news/articles/2019-04-11/more-black-u-s-farmers-but-fewer-own-land-or-make-big-bucks>; 2017 *Census of Agriculture*, *supra* note 6.

Further, any convenience that is achieved by banks' increased reliance on technology and on-line access is tempered by the tendency of these features to 'lock in' users, making it costly to switch banks, and automating the process by which banks can charge fees and change fee structures with no practical scrutiny from their customers.⁴²

The Acquisition and Merger Will Benefit Corporate Profits at the Expense of Customers

That the investment community is in favor of the merger, both on its own terms, and as a "tipping point" that signals further consolidation should give the Fed serious pause.⁴³ The efficiencies from the merger will be achieved at the expense of customers in rural communities, and a reduction in compliance staff tasked with monitoring enforcement of consumer protection laws such as the CRA. These increased profits should be viewed as a form of monopoly "rents" that are achieved not by offering superior products, but by successfully restricting competition and choice in banking markets.⁴⁴

⁴² Nelson D. Schwartz, *Online Banking Keeps Customers On Hook for Fees*, The New York Times (Oct. 15, 2011), <https://www.nytimes.com/2011/10/16/business/online-banking-keeps-customers-on-hook-for-fees.html>.

⁴³ Jim Marous, *Too Big to Fail, Too Small to Succeed*, The Financial Brand (Feb. 11, 2019), <https://thefinancialbrand.com/80650/digital-banking-technology-innovation-merger-suntrust-bbt/> ("[M]any in the investment community believe the BB&T+SunTrust merger may be the tipping point for future consolidation of the industry. One benefit of the just announced combination of regional giants is the ability to reduce overhead and benefit from bigger scale and scope.").

⁴⁴ Scherer, *supra* note 12, at 9 ("[I]ndustrial organization theory and statistical evidence teach that market concentration -- that is, a high market share collectively held by the largest few sellers in a well-defined and meaningful economic market -- is conducive to either monopoly pricing or cooperative oligopoly pricing, yielding elevated prices and supra-normal profits (i.e., economic rents).").

The Acquisition and Merger Will Be Contrary to the Convenience And Needs of the Community

Another key factor the Board and FDIC must consider in its review of the SunTrust and BB&T acquisition and merger is “[t]he convenience and needs of the communities to be served.”⁴⁵ The Board must specifically consider “the record of performance under the Community Reinvestment Act of 1977 ... and regulations issued thereunder”⁴⁶ This factor favors rejection of the merger because it will lead to a significant reduction in compliance under the CRA. Enforcement of the CRA is critical to the NBFA and its members, as farmers’ livelihoods depend on access to capital and financial services on fair and equal terms.

The CRA requires the Board to “assess the institution’s record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with the safe and sound operation of such institution.”⁴⁷ The CRA protects minority and economically disadvantaged communities such as those in which NBFA members earn their livelihoods.⁴⁸ As of 2017, over 73 percent of Black farmers reported income from farming of less than \$10,000.⁴⁹

⁴⁵ 12 C.F.R. § 225.13(b)(3); 18 U.S.C. § 1828 (c)(5)(B) (requiring the reviewing party to “take into consideration the financial and managerial resources and future prospects of the existing and proposed institutions, the convenience and needs of the community to be served, and the risk to the stability of the United States banking or financial system.”).

⁴⁶ 12 C.F.R. § 225.13(b)(3).

⁴⁷ 12 U.S.C. § 2903(a)(1).

⁴⁸ Lei Ding & Leonard Nakamura, “*Don’t Know What You Got Till It’s Gone — The Effects of the Community Reinvestment Act (CRA) on Mortgage Lending in the Philadelphia Market*,” (Federal Reserve Bank of Minneapolis, Working Paper No. 17-24, at 1, 2017) <https://www.minneapolisfed.org/institute/working-papers/wp17-24.pdf> (“We find evidence that the loss of CRA eligibility status in a neighborhood leads to a decrease of about 10 percent to 20 percent (depending on the models and specifications used) in the volume of purchase mortgage originations by CRA-regulated lenders. . . . The CRA effects are more pronounced among minority borrowers and borrowers who used to qualify for CRA credit but became newly ineligible. Without the incentive of CRA, it seems depository

CRA concerns are raised here because a motivating factor in the merger is a cost savings from closing branches at rural locations.⁵⁰ BB&T and SunTrust have announced that they plan to save \$1.6 billion in operating expenses by closing hundreds of branch offices.⁵¹ BB&T's CEO, Kelly King, said that the bank has "a lot of small branches in a lot of rural areas, and we're being much more aggressive in terms of rationalizing that structure." Observers have noted that BB&T branches that service rural locations will be closed.⁵²

NBFA is concerned that these branch reductions will have a disproportionate impact on branches that service NBFA members, and other farmers in rural areas. These closures will disproportionately impact NBFA members, and make the merged firm less responsive to the needs of customers in economically vulnerable communities.

NBFA is also concerned that the merger may result in a reduction of staff tasked with compliance issues related to legislation (such as the CRA) that is important to the NBFA and its members. Compliance staff cuts have become common in the last two years.⁵³ The NBFA is concerned that BB&T and SunTrust will use the merger to accelerate these reductions.⁵⁴

institutions are less likely to keep up or expand their supply of mortgage credit in lower-income neighborhoods; instead, they tend to scale back their lending from these neighborhoods by reducing the supply of mortgage credit to minority borrowers and borrowers who no longer qualify for CRA credit.").

⁴⁹ 2017 *Census of Agriculture*, *supra* note 6.

⁵⁰ Jordan Wathen, *BB&T and SunTrust Have Plenty of Branch Fat to Trim*, *The Motely Fool* (Feb. 9, 2019), <https://www.fool.com/investing/2019/02/09/bbt-and-suntrust-have-plenty-of-branch-fat-to-trim.aspx>.

⁵¹ *Id.*

⁵² *Id.* ("Roughly 46% of BB&T's branches have less than \$50 million in deposits, branches that are unlikely to be particularly profitable if the bulk of their value comes from sourcing liabilities rather than generating noninterest income.").

⁵³ Richard Partington, *Banks Trimming Compliance Staff as \$321 Billion in Fines Abate*, *Bloomberg* (Mar. 22, 2018), <https://www.bloomberg.com/news/articles/2017-03-23/banks-trimming-compliance-staff-as-321-billion-in-fines-abate>.

⁵⁴ Section 42 of the Federal Deposit Insurance (FDI) Act, 12 U.S.C. § 1831r, <http://www.fdic.gov/regulations/compliance/manual/pdf/X-2.1.pdf>; *see also* Policy Statement of Office of the

The FDIC has also published guidance for mergers and acquisitions of banking institutions that recommend the following:⁵⁵

- “Consider the effect of the merger/acquisition on the demarcated CRA assessment area. Should the assessment area be expanded as a result of the transaction?”
- Determine whether the merger will change how the surviving bank is evaluated for CRA. For example: Will an increase in asset size define the bank as an ‘intermediate small bank’ after two consecutive years with assets above the published threshold? Will the merger result in the acquisition of branches in a separate Metropolitan Statistical Area (MSA) or a non-contiguous non-MSA?
- Ensure the CRA Public File at each office is updated to reflect new loan-to-deposit ratios (for institutions subject to the small bank lending test), updated assessment area(s), products and services, HMDA disclosure statement (if applicable), and branch listing.
- Ensure branch closing policies adhere to statute and applicable policy.
- Consider Interstate Banking and Branching Efficiency Act applicability. Review impacts on how the surviving institution will be evaluated.

Comptroller of the Currency, Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, and Office of Thrift Supervision Concerning Branch Closing Notices and Policies, 64 Fed. Reg. 34,845 (June 29, 1999).

⁵⁵ Matthew Z. Zamora, *Mergers and Acquisitions: A Compliance Perspective*, FDIC, 14 (2013), <https://www.fdic.gov/regulations/examinations/supervisory/insights/sisum13/sisummer13-article02.pdf>.

- Ensure mergers between insured depository institutions (IDI) and an IDI and a noninsured institution satisfy the requirements of the Bank Merger Act and related Interstate Banking and Branching Efficiency Act.”

NBFA requests that, as part of its deliberations, the Board and FDIC provide public information that gives transparency to CRA compliance issues for the combined firm.

BB&T’s History of Non-Compliance with the CRA Should Concern Regulators

The Board must consider the merging firms’ “compliance with laws and regulations” in determining whether to approve an acquisition.⁵⁶ In the past the FDIC has identified unfair lending practices conducted by BB&T. The NBFA is concerned that because BB&T is the acquiring party, it may seek to impose practices not compliant with the CRA on the merged entity.

For instance, in 2008, the FDIC downgraded BB&T’s CRA rating from outstanding to satisfactory due to violations of the anti-discrimination provisions of the fair lending laws and regulations.⁵⁷ The FDIC stated that it had identified a pattern or practice of violations of the Equal Credit Opportunity Act,⁵⁸ the Federal Reserve Board’s implementation regulation,⁵⁹ the Fair Housing Act,⁶⁰ and the Department of Housing and Urban Development’s Fair Housing Regulations.⁶¹

⁵⁶ 12 C.F.R. § 225.13(b)(2).

⁵⁷ *Community Reinvestment Act Performance Evaluation*, FDIC, 32 (Jan. 22, 2008) https://www5.fdic.gov/CRAPES/2008/09846_080122.PDF.

⁵⁸ 15 U.S.C. § 1691, *et seq.*

⁵⁹ 12 C.F.R. Part 202.

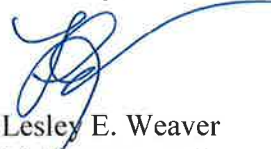
⁶⁰ 42 U.S.C. § 3605.

⁶¹ 24 C.F.R. Part 100.

In its most recent CRA report on BB&T, the FDIC again identified a substantive violation of the fair lending laws. In the report, the FDIC stated that “findings from a 2015 Consumer Financial Protection Bureau targeted review resulted in a substantive violation of Regulation B, which implements the Equal Credit Opportunity Act.”⁶² While the violation identified in the report did not lower BB&T’s CRA rating, it shows BB&T’s history of violating Fair Lending laws. The prospective acquisition and merger risks spreading BB&T’s lax compliance culture to SunTrust branch locations. If so, everyday Americans, including members of the NBFA, will suffer.

The NBFA appreciates the Board and FDIC’s consideration of these concerns, and would like to arrange a meeting to discuss them in greater detail.

Sincerely,



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⁶² *Community Reinvestment Act Performance Evaluation: Branch Banking and Trust Company*, FDIC, 43 (Jan. 17, 2017), https://www5.fdic.gov/CRAPES/2017/09846_170117.PDF.

Appendix A

Table 1: Southern States —2017 Demographic Information⁶³

State	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Florida	79933	2299	47590	11280	58.9
Georgia	68764	2773	42439	10183	57.9
North Carolina	74958	2041	46418	11513	58.1
South Carolina	39332	2570	24791	6791	58.2
Virginia	71339	1693	43225	11239	58.5
Total	334326	11376	204463	51006	58.32

⁶³ 2017 Census of Agriculture, *supra* note 6. All demographic information in this appendix has been obtained from this source

Table 2: MSAs —2017 Demographic Information

MSAs	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Atlanta-Sandy-Spring-Roswell, GA	13731	339	8319	1738	58.1
Charlottesville, VA	3785	66	2217	490	59.8
Deltona-Dayton Beach-Ormond Beach, FL	2912	50	1691	404	58.2
Durham-Chapel Hill, NC	3352	113	2043	376	57.3
Homosassa Springs, FL	1114	38	609	116	58.9
Macon-Bibb County, GA	1385	44	790	149	57.8
Roanoke, VA	3224	42	2011	584	60.3
Staunton-Waynesboro, VA	2880	4	1665	475	57.1
The Villages, FL	2165	58	1307	331	59.1
Virginia Beach-Norfolk-Newport News, VA-NC	2687	70	1502	230	56.2
Winston-Salem, NC	908	10	557	163	59.6
Total/Average	38143	834	22711	5056	58.4

Table 3: Atlanta-Sandy Springs-Roswell, Georgia MSA —2017 Demographic Information

Counties of this MSA	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Barrow County, GA	465	9	288	61	61
Bartow County, GA	735	0	469	104	57.4
Butts County, GA	285	1	173	54	63.5
Carroll County, GA	1370	12	867	163	58.3
Cherokee County, GA	710	0	430	44	57.6
Clayton County, GA	36	6	19	2	64.3
Cobb County, GA	192	5	116	9	58.5
Coweta County, GA	623	28	386	88	58.2
Dawson County, GA	310	0	192	43	58.9
DeKalb County, GA	52	5	34	1	47.4
Douglas County, GA	144	3	93	30	60.8
Fayette County, GA	232	0	148	20	58.1
Forsyth County, GA	477	6	291	75	58.5
Fulton County, GA	343	54	195	16	55
Gwinnett County, GA	302	10	177	38	56
Hall County, GA	951	0	551	105	58.5
Haralson County, GA	526	1	321	97	56.5
Heard County, GA	368	11	227	36	55.9
Henry County, GA	393	20	240	48	58.2

Jasper County, GA	408	7	251	57	56
Lamar County, GA	367	11	220	45	59.5
Merriweather County, GA	620	39	334	73	57.7
Morgan County, GA	847	47	513	119	58.7
Newton County, GA	485	32	292	59	59.2
Paulding County, GA	384	0	212	47	57.3
Pickens County, GA	428	0	258	73	56.1
Pike County, GA	506	7	286	61	58.5
Rockdale County, GA	122	12	74	16	57.9
Spalding County, GA	363	2	225	48	61.4
Walton County, GA	687	11	437	106	59.5
Total/Average	13731	339	8319	1738	58.1

Table 4: Charlottesville, Virginia MSA —2017 Demographic Information

Counties of this MSA	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Albemarle County, VA	1583	9	913	171	60.8
Buckingham County, VA	655	24	408	110	58.8
Fluvanna County, VA	482	7	273	51	59.6
Greene County, VA	352	12	214	47	61.1
Nelson County, VA	713	14	409	111	58.5
Total/Average	3785	66	2217	490	59.8

Table 5: Deltona-Daytona Beach-Ormond Beach, Florida MSA —2017 Demographic Information

Counties of this MSA	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Flagler County, FL	228	0	116	31	59.6
Volusia County, FL	2684	50	1575	373	56.7
Total/Average	2912	50	1691	404	58.2

Table 6: Durham-Chapel Hill, North Carolina MSA —2017 Demographic Information

Counties of this MSA	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Chatham County, NC	1757	24	1116	242	58.4
Durham County, NC	376	16	241	54	56.1
Orange County, NC	1219	73	686	80	57.5
Total/Average	3352	113	2043	376	57.3

Table 7: Homosassa Springs, Florida MSA —2017 Demographic Information

County of this MSA	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Citrus County, FL	1114	38	609	116	58.9
Total/Average	1114	38	609	116	58.9

Table 8: Macon-Bibb County, Georgia MSA —2017 Demographic Information

Counties of this MSA	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Bibb County, GA	166	14	98	16	56
Crawford County, GA	350	14	192	33	53.5
Jones County, GA	311	12	165	30	54.1
Monroe County, GA	373	2	219	35	68.6
Twiggs County, GA	185	2	116	35	57
Total/Average	1385	44	790	149	57.8

Table 9: Roanoke, Virginia MSA —2017 Demographic Information

Counties of this MSA	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Botetourt County, VA	852	1	551	129	60.3
Craig County, VA	304	0	179	28	61.7
Franklin County, VA	1676	39	1019	339	55.6
Roanoke County, VA	392	2	262	88	63.6
Total/Average	3224	42	2011	584	60.3

Table 10: Staunton-Waynesboro, Virginia MSA —2017 Demographic Information

County of this MSA	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Augusta County, VA	2880	4	1665	475	57.1
Total/Average	2880	4	1665	475	57.1

Table 11: The Villages, Florida MSA —2017 Demographic Information

County of this MSA	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Sumter County, FL	2165	58	1307	331	59.1
Total/Average	2165	58	1307	331	59.1

**Table 12: Virginia Beach-Norfolk-Newport News, Virginia/North Carolina MSA —2017
Demographic Information**

Counties and Cities of this MSA	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Gloucester County, VA	300	12	166	30	54.9
Isle of Wight County, VA	422	3	237	25	54.8
James City County, VA	128	4	72	5	58.9
Matthews County, VA	66	0	43	8	59.3
York County, VA	78	2	40	1	52.1
Chesapeake City, VA	462	2	248	44	58
Hampton City, VA	n/a	n/a	n/a	n/a	n/a
Newport News, VA	n/a	n/a	n/a	n/a	n/a
Poquoson City, VA	n/a	n/a	n/a	n/a	n/a
Portsmouth City, VA	n/a	n/a	n/a	n/a	n/a
Suffolk City, VA	466	25	270	47	57.3
Virginia Beach City, VA	376	20	196	34	55.3
Williamsburg City, VA	n/a	n/a	n/a	n/a	n/a
Currituck County, NC	153	0	89	11	56.2
Gates County, NC	236	2	141	25	58.5
Total/Average	2687	70	1502	230	56.5

Table 13: Winston-Salem, North Carolina MSA —2017 Demographic Information

County where this MSA lies	Farmers	Black Farmers	Number of Operating Farms	Farms w/o Internet Access	Average Age of All Farmers
Forsyth, NC	908	10	557	163	59.6
Total/Average	908	10	557	163	59.6



Prince William County Alumnae Chapter
Delta Sigma Theta Sorority, Inc.
P.O. Box 1099
Woodbridge, Virginia 22195

April 20, 2019

On behalf of the Prince William County Alumnae Chapter, I am writing to provide comments about SunTrust's support of the greater Prince William County community and its youth through SunTrust's generous sponsorship of our annual Martin Luther King Oratorical Program held each January at the Hylton Memorial Chapel in Woodbridge, Virginia. Our organization, chartered in 1984, has a 501c7 tax status, and we are affiliated with the Delta Education and Research Foundation, a 501c3 organization which shares in the support of the program.

In addition to developing an appreciation of the oratorical legacy and contributions of Dr. King, our program also supports the applicable achievement goals of the participating school divisions (Prince William County, Cities of Manassas and Manassas Park) and promotes the enriching benefits of our diverse community. The support of SunTrust along with others has helped us host over 2,500 participants from the greater Prince William County, Virginia area, which include a diverse audience, the youth program participants and their parents, more than 200 community volunteers and multiple media outlets.

Over 700 students have participated in this competition over the past 30 years, and many have been recognized locally, statewide, and nationally and attest to benefits of this life-changing experience. One of our orators from 2000, Dr. Ibram Rogers, is now a professor at the University of Florida and recipient of the 2016 National Book Award in Nonfiction. In 2016, his mother sent the program chairs this message: *"Writing and giving the speech for this contest had a profound effect on Ibram's life. It allowed him to internalize the impact of our people's history on the future of this nation... The MLK oratorical competition makes more of a difference than you realize. Thank you."*

This kind of impact on youth would not be possible without the support of organizations like SunTrust. We are committed to serving our community in substantive and meaningful ways, and it has been encouraging to know that SunTrust shares this public service mission. It has been the consistent and persistent work of SunTrust and Muriel Garr, one of your Senior Vice Presidents, which has made this support impactful for the youth we serve. Again, we are grateful for the support of SunTrust. We look forward to the merger of SunTrust and BB&T and the opportunity for a continued partnership.

Sincerely,

Lorraine P. Jackson
President, Prince William County Alumnae Chapter
Delta Sigma Theta Sorority, Incorporated



COLLABORATION INNOVATION TRANSFORMATION

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

April 21, 2019

Heather M. Raspberry
Executive Director, HAND
PO Box 48386
Washington, D.C. 20002
202.754.1311
hraspberry@HANDHousing.org

To Whom It May Concern,

On behalf of the Housing Association of Nonprofit Developers (HAND) Board of Directors, I'm writing this letter to express our support of the merger between SunTrust Bank and BB&T. HAND is a nonprofit membership association comprised of over 350 organizations working across the private, public and nonprofit sectors to collaborate in the production and preservation of affordable housing in the Capital Region of Baltimore, Washington, and Richmond. Through education, engagement and regional advocacy, HAND builds the capacity of its diverse membership to support the development of sustainable communities for individuals and families at all income levels. HAND programming is supported through a diverse range of foundations, corporations, government entities, and individuals who envision a region where all of our residents share equitably in the knowledge, wealth and resources uniquely represented in the Capital Region. Grounded in this belief, HAND serves as the leading convener, educator and activator of a diverse, cross-sector membership of real estate developers, government agencies, lenders, service providers, investors, syndicators, property managers, law and accounting firms, architects, engineers, universities, lenders, students and others whose partnership is required to bring communities anchored in affordable housing to fruition.

HAND was founded in 1991 to support nonprofit developers who were seeking peer to peer support in learning how to best serve as real estate developers utilizing new programs that were structured to encourage investment of private equity in the development of housing for low-income households. As the organization grew, the decision was made to incorporate and establish a board of directors to guide its growth. In 1998, HAND obtained its 501(c)3 nonprofit status and SunTrust (via Crestar) was one of the first financial institutions to support the organization. SunTrust remains a supporter of the organization's Annual Meeting bringing together the best minds and industry thought leaders to address challenges and solutions to the region's affordable housing crisis. HAND's Annual Meeting is the largest convening of affordable housing practitioners in the Washington Metropolitan region welcoming 1400 attendees each year.

BB&T has also been an active and engaged supporter of HAND, specifically in funding the organization's annual training series designed to build the capacity of organizations and practitioners committed to affordable housing development. In addition to funding customized educational forums, BB&T has twice supported HAND hosting the National Development Council's Housing Development Finance Professional Certification Series, which provides a critical foundation to learning affordable housing finance. Over 100 practitioners working in HAND's geographical footprint were certified through the NDC series. In the fall of 2019, HAND looks forward to hosting a series of trainings focused on Racial Equity that will also be supported by BB&T. The Bank's contribution to the organization also extended into service on our board. The vision, commitment and outstanding thinking of our Board of Directors guides and inspires the organization's strategic vision, and HAND greatly benefited from having Craig Pascal, Senior Vice President, BB&T serve on the board for four terms.

It is with great pleasure that HAND writes this letter of support for the merger of two financial institutions who have both played integral roles in our organization's history and current trajectory. Should you have additional questions, please don't hesitate to reach me at 202.754.1311 or [hraspberry@handhousing.org](mailto:h raspberry@handhousing.org).

Sincerely,



Heather M. Raspberry
Executive Director
HAND

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Steve Smith, *Director*
AHC Inc.

Eike, Kathy

From: Devon Anders <devon.anders@interchangeco.com>
Sent: Sunday, April 21, 2019 8:07 PM
To: RICH BankSup Applications Comments
Subject: [External] Comment Letter - BB&T & Suntrust Merger

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To Whom it May Concern:

Our firm is an approx. \$100MM industrial real estate development and logistics firm. We have been in business for 25 years and are privately held. We have many lenders supporting our business. We have been doing business with BB&T for approximately 14 years as a real estate lender. Recently, however, they have significantly increased their interest in us and are developing a long-term relationship with us. They recently have committed to financing a \$42MM cold storage warehouse and have also been chosen to become our lead bank for depository services and our working capital line. This has been done through their analysis of what makes our business successful and lending to that. It has moved from a compliance relationship to one that is projecting future growth as the market continues to respond to us taking risk to have assets in place at the right time.

We value the relationship with BB&T and support the merger with Suntrust.

Please let me know if you have any questions.

Best regards,

Devon C. Anders
President
InterChange Group, Inc.
1346 Pleasants Drive, Ste. 6
Harrisonburg, VA 22801
(540)433-1900
(540)578-1262 mobile
www.interchangeco.com



3545 Belair Road, Baltimore, MD 21213
p: 410.485.8422 :: f: 410.485.0728
www.belair-edison.org
www.belairedison.city

April, 19, 2019

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

Dear Ms. Leone de Nie,

On behalf of Belair-Edison Neighbohorhoods, Inc. (BENI), it is my pleasure to express support for the BB&T Bank and SunTrust Bank "Merger of Equals."

BENI has a 27-year history of working to revitalize and stabilize the community. We offer a variety of free programs and services to assist new and current residents, facilitate several capital improvement projects, help with small business development along Main Street corridor, and ultimately market the neighborhood as an ideal place to live, work, and spend.

For years BB&T Bank has been one of BENI's leading lending institutions helping us promote homeownership and entrepreneurship in our community. A recent partnership with SunTrust Bank aims to do the same. I am confident in saying that together our work has led, and will continue to, a resilient neighborhood that remains strong throughout challenges as well as even stronger homeowners and business merchants.

We strive to create community development initiatives that will improve homeownership rates, decrease vacancy and foreclosure rates, and an improved external and internal image of the neighborhood. To have the support of both BB&T and Sun Trust Bank makes our clients and other community stakeholders feel confident in investing in Belair-Edison.

With that said, we are in full support of this merger as it will build upon a long tradition of excellence in community banking!

Sincerely,

Kadija Hart
Director of Resource Development
3545 Belair Rd.
Baltimore, Maryland 21213
kadija@belair-edison.org
410-914-4241 (office) / 410-485-8422 (fax) / 443-756-7817 (cell)



God's People Doing God's Work

P.O. BOX 3203 ■ NORFOLK, VA 23514
www.unionmissionministries.org

April 16, 2019

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



To Whom It May Concern:

Since 1892 The Union Mission has compassionately served the least, the last, and the lost in our community including men, women, and children without a home and with nowhere else to turn. SunTrust has been an important partner to The Union Mission, the largest homeless shelter in Hampton Roads, since 2007 in helping to provide food, shelter and life changing programs for those who come to us in need.

Over the years, the Men's and Women's Shelters moved five times until 2009 when a permanent campus was established in our current location. SunTrust provided significant financial support to our capital campaign from 2008 to 2014 allowing The Mission to greatly increase our capacity to care for men and single women as well as adding the Women and Children's shelter. SunTrust has continued to provide transformative support for the Women and Children's Shelter through their generous gifts in 2016, 2017, and 2018. These gifts support The Mission in being a place of refuge and encouragement for those who come to us trying to overcome life's difficult circumstances as seen in the following story of one of our guests.

Cierra and her brother were raised by their father. They rarely saw their mother. She graduated from high school but at eighteen got pregnant and had a daughter, Aaleyah. In 2013, she started school to become a medical assistant, but left and got a job at a Walmart pharmacy where she stayed for two years. Life was good until she got back with an old boyfriend. "That's when things went downhill. It was really, really horrible and I left him and went to stay with my family, but it was a struggle day after day." She wasn't getting enough hours at work, was trying to pay her car note, and take care of her daughter. When she was no longer able to stay with her family she turned to The Union Mission. "Coming to the Mission is the best thing that ever happened to me. Everybody has been so supportive. I'm going through the hardest time in my life, but they lift me up and pray for me!" Cierra and Aaleyah have moved into their own apartment, and today she has a good paying job, but it's bittersweet. "My brother was killed while I was here and he was the only one I was close to. He'd be with me if he was still alive, so I'm doing this for him too. Being at the Mission has made me stronger. Now I let God handle everything and my brother is in His hands."

Food, Clothing, Shelter ... and so much more!



God's People Doing God's Work

P.O. BOX 3203 ■ NORFOLK, VA 23514

www.unionmissionministries.org

SunTrust is a valued partner of The Union Mission. Their generosity and compassion for the hurting men, women, and children who live in our community make it possible for The Mission to continue to care for their physical and spiritual needs. Thank you for the opportunity to present this letter and please feel free to contact me if I can answer any questions or provide additional information.

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Sincerely,

Rev. John W. Gray, Jr.
Executive Director

Food, Clothing, Shelter ... and so much more!

5100 E. VIRGINIA BEACH BLVD. ■ NORFOLK, VA 23502 ■ PHONE 757-627-8686 ■ FAX 757-305-9110 ■ EMAIL info@ummnorva.org

Federal Reserve Bank of Richmond

P.O. Box 27622

Richmond, VA 23261

To whom it may concern:

I am writing to support the BB and T merger with SunTrust. I have a rich history with BB and T and have worked with them across most of their business units. BB and T was / is instrumental in helping provide capital, insurance and financial advisory in the development of the following business 's that I have lead, founded or turned around.

Flanders Corporation

Pitt Electric

OakRidge Metals

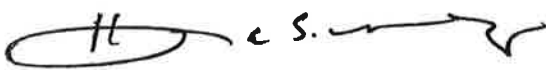
National Whse Leasing

Double B Ventures

BBL LLC

The above represents varying scale and complexity from an organization that had 4100 employees that manufactured products to a real estate investment platform focused on multi-family and commercial real estate. BB and T has been instrumental in helping me and my team create significant jobs and economic growth and has supported the companies through both good and bad markets. Todays banking world requires scale and this merger will give BB and T and SunTrust the scale needed to meet market demands and provide the many platforms required to be successful in this space.

Regards,

A handwritten signature in black ink, appearing to read "H. L. Smith". The signature is written in a cursive style with a large, looped initial "H".

Harry L. Smith

Business Owner/Investor

Chairman UNC Board of Governors

Federal Reserve

I am the Chief Executive Officer for the Boys & Girls Clubs serving Chattooga, Gordon, Murray, & Whitfield Counties. Our organization has had an ongoing relationship with BB&T since 2007. BB& T became our organizations bank in 2010. The local staff has been active with us through bank business as well as volunteering at our local Clubs. Having BB&T and the team support us financially and by volunteering is invaluable to our success locally in our community. We support the merger and support our local bank.

Robbie Slocumb
CEO
Boys & Girls Clubs
Serving Chattooga, Gordon, Murray & Whitfield Co.
rslocumb@bgcgmw.org
706-529-5032



BOYS & GIRLS CLUBS

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Murray, & Whitfield
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Shanda Wein

Robbie Slocumb
Chief Professional Officer



April 22, 2019

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

Re: *Proposed Merger of Equals between BB&T and SunTrust*

Dear Sir or Madam:

I am the President Davison Fuels & Oil, a BB&T client since July 2014. We are one of the largest locally-owned and operated wholesale distributors of fuel and lubricants in the Southeastern United States. Located in Mobile, Alabama, Davison has over 200,000 gallons of bulk lubricant storage and over 100,000 square feet of warehouse space. Our Company's existence dates back to 1950.

Since moving our banking relationship to BB&T about five years ago, they have provided working capital to help expand and grow our Company; as well as, deliver as safe and secure cash management treasury platform for all of our businesses. They've been a strong supporter of our Company and may more like us in Mobile, Alabama.

I support the merger and I believe the combined entity will be good for our community and the associates.

A handwritten signature in blue ink, appearing to read 'S. David Padgett', is written over a light blue horizontal line.

S. David Padgett
President
Davison Fuels & Oil



CHI Memorial Foundation

April 22, 2019

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

RE: SunTrust/BB&T Merger Application

Dear Sirs:

I am writing to express my support of the proposed merger between SunTrust and BB&T Banks. SunTrust has been a long-standing partner of CHI Memorial Foundation (Memorial Health Care System Foundation) as our bankers for many years and as a community partner.

SunTrust's support has been extremely meaningful to our work throughout the community in a variety of ways. They have long supported our efforts to provide primary care to underserved populations in the Chattanooga area through our community clinics as well as efforts to enhance some of our core services – cardiac and cancer care in the community.

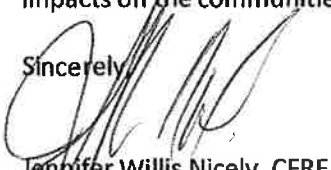
SunTrust's largest gift came in 2004 when they were one of three partners who brought the first mobile mammography bus to our region through gifts to CHI Memorial Foundation. This was a tremendous leap of faith that has been instrumental in providing breast health care to women now in 29 counties throughout Tennessee and north Georgia. The program was so successful, a second bus was needed several years later to meet the demand and once again, SunTrust was part of the efforts to purchase.

CHI Memorial's mobile breast care program now sees approximately 6,000 women each year. The majority of these women are in rural or underserved areas and do not have easily accessible options for preventative screenings. The buses also visit area factories and businesses where women can quickly receive a screening mammogram when they would typically not take time off work for their own healthcare needs. Through programs and grants, we are able to offer free screenings and follow up care to women who are uninsured or underinsured.

Thanks to SunTrust's community spirit of giving and involvement, tens of thousands of women have been positively impacted and this is just one example of their work. Dozens of other area nonprofits and projects have been similarly supported by SunTrust.

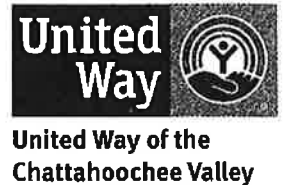
It is our hope that together, a newly merged SunTrust and BB&T will continue to make these types of impacts on the communities they serve.

Sincerely,



Jennifer Willis Nicely, CFRE
President
CHI Memorial Foundation

P.O. Box 1157
Columbus, GA 31902
706-327-3255
706-571-2271 Fax
unitedwayofthecv.org



April 22, 2019

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

The Chattahoochee Valley is a unique and generous place to live, work and raise our families. Companies like SunTrust embody that generosity every day. SunTrust and BB&T have a long history of being strong supporters in this community. Here at United Way of the Chattahoochee Valley, we value our relationships with both financial institutions.

For over two decades, SunTrust has supported our efforts to make a positive impact in our community through their employee giving, their corporate giving as well as their volunteer hours. The role they play in our mission is invaluable.

United Way of the Chattahoochee Valley works to better the lives of everyone in our community. We do this by funding programs at local non-profits whose missions fall into one of our four core areas: basic needs, health, education and income. SunTrust's mission of lighting the way to financial well-being for all seamlessly lines up with our purpose.

Because both SunTrust and BB&T are strong supporters of our community, we believe they could only be better together. With the continued support of these companies, the Chattahoochee Valley has an even brighter future.

Sincerely,

A handwritten signature in black ink that reads "Becky Fletcher". The signature is written in a cursive, flowing style.

Becky Fletcher
VP, Resource Development

LIVE UNITED

Eike, Kathy

From: Blair Crooke <blair@gcteinc.com>
Sent: Monday, April 22, 2019 11:27 AM
To: RICH BankSup Applications Comments
Subject: [External] Merger

NONCONFIDENTIAL // EXTERNAL

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April 22, 2019

To whom it may concern,

I am writing you today to help show my interest in having the merger of BB&T and SunTrust go thru. I am a road construction contractor and have been banking with Tom Owens at BB&T in Pensacola, FL for 15 years. I have a direct line to Tom and he takes care of any of my issues immediately. I recently decided to buy a 600k waterblasting truck and BB&T was able to get me a line of credit in a very short period of time. This is the first truck of its kind in the entire panhandle of Florida and will allow me to stay ahead of my competition. My Parents as well as my children all have checking and savings accounts there and are also very pleased with their service.

The ability of these two banks to join forces in Pensacola will not only allow me to have a branch closer to my office but offer more choices in the type of services available.
Thank you for your time.

Sincerely,

Blair S. Crooke

President

Gulf Coast Traffic Engineers, Inc.

8203 Kipling St.

Pensacola, FL 32514

W: (850)478-7066

C: (850)910-1520

blair@gcteinc.com

www.gcteinc.com



UPSTATE | FOUNDATION

University of South Carolina

April 19, 2019

RE: SunTrust Bank Letter of Support

To Whom It May Concern:

It is a great pleasure to write a letter of support for SunTrust Bank in recognition of their support of and partnership with the University of South Carolina Upstate Foundation, which spans more than 25 years.

For the last seven years, SunTrust has sponsored a financial literacy training series for USC Upstate students, as well as the broader community. This five-week series is taught by a USC Upstate instructor who covers topics ranging from money basics and credit scores; education and career debt; big purchases and budgeting; and investments and retirement savings. Enclosed is a recent article that appeared in GSA Business Report outlining the benefits of this program for your reference.

The generous support from SunTrust has impacted hundreds of students each year since its inception. This academic-adjacent offering has broadened knowledge, built confidence, and created more responsible citizens along the way. SunTrust's steadfast commitment to lifelong learning and its mission of "lighting the way to financial wellbeing" is a noble one.

A public, regional comprehensive university, USC Upstate serves the many, rather than the few. As a major engine with half a billion dollars annual economic impact on the region, USC Upstate is developing the next generation of globally competitive professionals through accessible, rigorous, career-relevant higher education that meets the needs of both students and industry.

Each year, the university infuses nearly 1,500 graduates into the professional world who are prepared to invigorate and strengthen our communities and address regional workforce demands. Thanks to community partners like SunTrust, we are able to deliver on this mission to enhance and strengthen the quality of life we enjoy throughout Upstate South Carolina.

We appreciate SunTrust's continued support and look forward to strengthening the region together through future partnerships.

Sincerely,



Meredith N. Brunen, Ed.D.
Executive Director

Enclosure

HUMAN RESOURCES

Study: Personal financial stress takes toll on workforce



By Ross Norton

rossnorton13

rnorton@scbiznews.com

FEB 26, 2019

Editor's Note: This story originally appeared in the Feb. 18 issue of GSA Business Report.

Spending strategies were simpler before credit cards. Even the wallet was simple, without all of those extra slots.

To use: open wallet and remove money for purchase. If there's no money, don't make the purchase.

"Pre-credit cards, when the cash was gone from the wallet you quit spending," said Becky Goessel, CPA and accounting instructor at USC Upstate. "We could visualize when to stop spending so we did."

Today's wallets contain much more than cash and the average person spends much more than what's inside.

Goessel said data compiled by the South Carolina Association of Certified Public Accountants show that the average American family spends \$1.22 for every dollar earned. Meanwhile, Financial Industry Regulatory Authority numbers say nearly two-thirds of Americans show low levels of financial literacy.

What it means is that employers under increasing pressure to do more with less in an increasingly competitive environment are relying on an increasingly stressed out workforce to get it done.

- 47% of employees report they are stressed dealing with their personal financial situation, according to a survey by PWC, once known as Price Waterhouse.
- 41% say their stress level related to financial issues has increased over 12 months, the PWC survey said.
- 40% of employees say personal financial matters cause the most stress in their lives, according to the PWC survey.

A Center for Financial Services Innovation report said 85% of Americans are anxious about their financial situation and that the anxiety interferes with work.

“I don’t know of an exact measure of how personal financial challenges affect a worker or a person generally but your mental health is very tied to financial security,” Goessel said. “Bad finances lead us to worry, get sick, get divorced and affect our relationships with those around us. This is why we have to guard against financial ignorance as our culture leads us to haphazard spending and harmful debt levels, causing high stress in levels that damage relationships.”

The Center for Financial Services Innovation says employers should address workers’ financial anxiety through wellness programs and other initiatives that provide financial education and help with spending, saving, borrowing and budget planning.

Goessel agrees, noting that nearly two-thirds of Americans show low levels of financial literacy. Those employees need help planning the best way to use their paychecks or in developing a strategy to work away debt. Even those with a higher level of financial literacy need help sometimes because emergencies or other unplanned life events can put even careful planners in debt.

Many companies offer some kind of financial advice program but not all of them are effective, she said.

“I know many employers have the 1-800 lines but I would be curious what percentage of the population uses them,” Goessel said. “I feel strongly that lunch and learn financial literacy programs would be the best thing. As an employer, offer a boxed lunch and make it optional and you will find that employees will want to attend. Also, they have a live person to go up to after the session and ask the personal question they could not ask.”

Goessel said a short series once or twice a year would be often enough for most employees. She said a short course can inspire employees. It can get them excited about gaining control of their financial situations. She has seen it work in her students.

“At USC Upstate we offer the SunTrust Financial Literacy program that incorporates five lunch-and-learn sessions. It is short enough to keep their attention and long enough for some valuable information to get into the program,” Goessel said. “Because it is available and accessible, students take advantage of it and have told me that it was life changing for them.”

Goessel said many of the people in today’s workforce simply have little exposure to the fundamentals of personal money management and there are plenty of traps that lead them to bad decisions. One result is that they become employees with the kind of spending habits that may cause trouble on the job.

“People are up against their old habits,” Goessel said. “They are up against more payday loan places with greater than 400% interest at every corner. They are up against readily available credit cards and not understanding the amount of money they are paying a month in interest. They don’t understand how to spend less than they get. They are up against people in their environment encouraging them to spend money they don’t have. Every store we go to offers us a ‘free’ credit card. ... The message our society gives is to not worry about it or track it. Just take the free money and worry about it tomorrow.”

Since society doesn’t teach people how to handle their money, Goessel said, for some of them the only chance to learn how to manage money may come from a program at work.

“If companies can afford to offer financial wellness programs, they should offer them,” she said.

“When we’re are not coached or educated about money it can hijack our mental health about our everyday living,” Goessel said. “Our society does not teach us how to spend less or how to prepare for the rainy day.”

Reach Ross Norton at 864-720-1222.



April 22, 2019

Federal Reserve Bank of Richmond
P.O. Box 27622
Richmond, VA 23261
Submitted via: comments.applications@rich.frb.org

RE: Application for Merger of SunTrust Bank & BB&T Bank

To Whom It May Concern:

On behalf of the Washington Area Community Investment Fund (Wacif), I am writing in support of SunTrust Bank's application before for the Federal Reserve Bank of Richmond to merge with BB&T Bank.

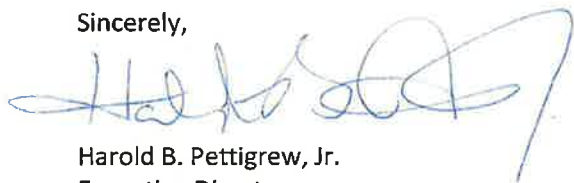
Established in 1987, Wacif's mission is to increase equity and opportunity in underserved communities in the Washington, DC area by investing knowledge, social, and financial capital in low- and moderate-income entrepreneurs. Our mission is driven by three strategic pillars: inclusive entrepreneurship, community wealth building, and equitable economic opportunity, and is fulfilled by providing access to capital products and services, and technical assistance to low-and moderate-income entrepreneurs.

SunTrust has been an important partner to Wacif throughout its history. Whether financially supporting our work to build the capacity of small businesses to access capital, to collaborating as a partner to drive equity and economic opportunity, SunTrust has been steadfast in its historical commitment to Wacif's mission. Since becoming chief executive three years ago, I would also like to note that Muriel Garr, Senior Vice President at SunTrust, has played an important role as a thought partner in driving Wacif's mission, and has been a wonderful representative of SunTrust in the region.

I am reassured that both companies will continue to be deeply committed to and invested in the communities we serve, and I am delighted that leadership from both SunTrust and BB&T Banks have expressed a desire to increase their combined CRA activity once the banks have merged.

Wacif is in support of the application for the merger of SunTrust and BB&T Banks, and sustained investment in the Washington metropolitan area's underserved communities. If you should have any questions, I can be reached at hpettigrew@wacif.org or 202-529-5505, ext. 212.

Sincerely,



Harold B. Pettigrew, Jr.
Executive Director

National Coalition of 100 Black Women, Inc. Metropolitan Atlanta Chapter ®

1718 Peachtree Street, Suite 985 € Atlanta, Georgia 30393 € 404-522-1061 € fax 404-522-6436 € www.ncbwmetroatlchapter.org



April 19, 2019

To Whom It May Concern:

The National Coalition of 100 Black Women, Inc., Metropolitan Atlanta Chapter is extremely excited about the partnership that we have with SunTrust Bank. Employees from SunTrust have participated in many of our events in the community by providing workshops on Financial Literacy. The employees have also served as volunteers for our events and program activities in the community.

We certainly look forward to this great partnership continuing with the merger of SunTrust/BB&T. The mission of our organization is to advocate on behalf of black women and girls to promote leadership development and gender equity in the areas of health, education and economic empowerment. The employees of SunTrust have been involved with our economic empowerment initiatives in the community. They have provided workshops for our teens in the mentoring program as well as the women participating in our Sisters Helping Sisters program.

It is our desire and hope that this great partnership will continue with the merger of the two banks. Partnering with companies such as SunTrust/BB&T, certainly help us to continue to meet the needs of our community. We look forward to the continuation of this partnership.

Sincerely,

Minnie Miller

Minnie Miller

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OLIVER F. COBB & ASSOCIATES, LLC

April 22, 2019

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

To whom it may concern:

As a local business owner I would like to take this opportunity to express my desire and interest as it relates to the much discussed merger between BB&T and Sun Trust. My experience and relationship dates back to September 2001 with BB&T, I hold both investments, stock, personal and business accounts with the local city President Mr. William (Bill) Davies.

Mr. Davies has been a very important factor in the success that our business has achieved over the last twenty plus years. Moreover, I have a clear memory and will always be grateful as to the manner that BB&T and Mr. Davies went above and beyond to assist me in obtaining the operating capital to expand our Insurance Sales and Service organization to diversify into an Insurance Records and Information Management firm that provides services to Federal, State and Local Governmental Agencies. Furthermore, this expansion could have not happened without the support of Mr. William Davies and BB&T.

Over time as our desire to expand throughout the United States with a focus on the eastern region from Miami Florida to the state of New York please allow me to be very clear, without the \$100,000.00 line of credit we would not be where we are today. My personal and professional expertise has allowed my organization to engage in business relations with both organizations, BB&T has demonstrated and proven that they have the personal and up close community banking relationship and I have had the opportunity to experience the Wealth Management expertise that Sun Trust will bring to this merger.

I fully support this merger and I truly feel this relationship will not only be a success, but great for the surrounding communities.

Best Regards, Oliver

Oliver Cobbs
Oliver F. Cobb & Associates
2709 Airport Road, Suite 110
Dalton, Ga 30721

Eike, Kathy

From: Cathy Ford | ASFIP <admin@asfip.org> on behalf of foundation@asfip.org
Sent: Monday, April 22, 2019 1:43 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Cc: asfipfoundationasst@gmail.com
Subject: [External] SunTrust Partnership

NONCONFIDENTIAL // EXTERNAL

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

Do not click on suspicious links. Do not give out personal or bank information to unknown senders.

I am writing on behalf of the ASFIP (Atlanta Society of Finance and Investment Professionals) Foundation (a 501C3), regarding SunTrust. We have found SunTrust to be a very good partner and we hope that BBT will continue that close association and history of support.

The ASFIP Foundation was created in 2015 by the ASFIP society. ASFIP has about 1,600 members with over 90% holding the CFA (Chartered Financial Analyst) designation. Our members average about 20 years of industry experience and we work in all areas of finance throughout Georgia. Our foundation was created to take the skills and knowledge of our members and apply them toward improving the financial literacy of the communities that we live and work in. We have several programs where we try to educate in classrooms and online for broad impact. Our SunTrust teammates have helped to read books to elementary students, developed online video content and held seminars for high school and college students on financial literacy.

The SunTrust organization has the most members in our professional society with over 90 members. SunTrust Foundation has approved our charity for matching funds when our members contribute to ASFIP Foundation. During the last 2 years, they have matched over \$9000 in contributions which has greatly aided our efforts. SunTrust has been a great partner in our efforts to improve the Atlanta community. We have worked together on several projects, particularly with Woodward Academy senior seminar. We held a meeting on life skills for 270 high school seniors with a topic of "Managing Risk". Last year we held elementary reading for 400 students in Atlanta Public Schools on difference between "wants and needs".

We welcome BBT to our community and hope to have your support as well as your partnership in our efforts to improve financial literacy throughout the Atlanta area.

For more information about our organization and our activities, please check online:

<https://asfip.org/AboutFoundation>

Please feel free to follow up with any questions.

Thank you,
ASFIP Foundation Board

Eike, Kathy

From: Summer Sage <ssage@hrfreeclinic.org>
Sent: Monday, April 22, 2019 2:09 PM
To: RICH BankSup Applications Comments; BankMergerApplication@fdic.gov
Subject: [External] SunTrust Merger

NONCONFIDENTIAL // EXTERNAL

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

Do not click on suspicious links. Do not give out personal or bank information to unknown senders.

We value the historical partnership and support our organization has participated in SunTrust's successful history, and look forward to working with them in the future. We are supportive of their ongoing community enriching projects and as this merger would support that growth we are in support of the planned merger. Please feel free to reach out to us if you have questions or if we can provide information helpful to you.

Thank you,

Summer Sage

Summer Sage
Executive Director
Harrisonburg-Rockingham Free Clinic
ssage@hrfreeclinic.org
Cell (434)960-9816
Office (540)437-4962

Compassionate Care. Extraordinary People
www.hrfreeclinic.org



Washington DC Police Foundation
1156 15th Street, NW, Suite 600
Washington, DC 20005

Phone 202.481.3270 Fax 202.659.8621

Email info@dcpolicefoundation.org

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The Honorable Anthony Williams
Federal City Council

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Steve Taylor
Lyft

Alan Helfer
HelferBell, LLC

April 17, 2019

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

To whom it my concern:

As the Executive Director of the Washington DC Police Foundation, I am writing this letter in support of SunTrust Bank as they seek to merge with BB&T Bank in furtherance of their financial mission. Prior to my current role with the DC Police Foundation, I served as the US Marshal for the District of Columbia, and for 27 years prior to that, I served with the DC Metropolitan Police Department. During my last 9 years with MPD, I worked as an Assistant Chief of Police and served as an ex-officio member of the DC Police Foundation. Over the course of my involvement with the DC Police Foundation this past decade, I have been fortunate to work with numerous individuals and organizations that have been unwavering in their support of the well-being and safety of the communities they provide services to.

SunTrust Bank, and specifically Dan O'Neill, has been at the forefront of our efforts in DC to create safe communities and assist our underserved populations. This past year, SunTrust was named as our "Business Partner of the Year", for their resolute support of our youth programs and efforts to stem the bloodshed in our neighborhoods with the greatest proclivity for violence. Dan O'Neill also serves as an active member of our Board of Directors, along with a cadre of other city leaders from both the public and private sector.

While I could provide a myriad of examples of the life-changing programs that SunTrust supports, they have been especially instrumental in the development and sustainability of the outreach and youth program pipeline for the MPD. SunTrust has consistently provided financial literacy training for both youth program participants, police cadets and officers. In the Spring of 2017, SunTrust Bank awarded the Foundation with a grant to fund the Youth Creating Change (YCC) program. YCC allows thirty at-risk youth to work with officers over a three-month period to cultivate their leadership skills, which are used to make a positive impact within their community. There are over 280 youth who have graduated from this program and its success would not be possible without the support of our SunTrust friends and family.

Supervision, Regulation
and Credit Department

APR 22 2019

Federal Reserve Bank
of Richmond

The DC Police Foundation and the city of Washington DC have been auspicious beneficiaries of SunTrust's commitment to the improvement of their communities and I am confident that this merger will only strengthen their position as leaders in the community – especially those communities that need the most help.

While I am unable to testify in person, I give my wholehearted support to this merger and offer my fervent gratitude to Dan O'Neill and SunTrust for the extraordinary work that they have done – and will continue to do in our Nation's capital.

Should you require additional information, I can be contacted at (202) 909-6542. Feel free to email me at Patrick.Burke@dcpolicefoundation.org

Sincerely,

A handwritten signature in black ink that reads "Patrick A. Burke". The signature is written in a cursive style with a large, prominent initial "P".

The Honorable Patrick A. Burke
Executive Director
DC Police Foundation



Wesley Housing Development Corporation

The door to brighter futures for over four decades

5515 Cherokee Avenue, Suite 200 • Alexandria, VA 22312 • Phone (703) 642-3830 • Fax (703) 941-1724 • www.wesleyhousing.org

From: Wesley Housing Development Corporation of Northern Virginia
To: Federal Reserve Bank of Richmond

Date: April 16, 2019

Subject: Support of Merger between SunTrust Bank and BB&T

I am writing in support of the merger between SunTrust Bank and BB&T. Both institutions are active in the local communities in which we operate.

SunTrust Bank has been a historic partner of Wesley Housing Development Corporation (WHDC) and has recently increased its support. SunTrust is the equity partner in one of our upcoming projects, The Arden, located next to the Huntington Metro Station in Fairfax County. In addition to the support that SunTrust is providing for The Arden, the SunTrust Foundation recently awarded a grant to WHDC in the amount of \$25,000, which will help to fund our Housing Stability initiatives.

I am also the Board Chair for the Northern Virginia Affordable Housing Alliance (NVAHA), which is an advocacy organization that was originally founded by the Metro Bankers Association. BB&T and SunTrust are long-term members of the Metro Bankers Association, and BB&T has continued to provide funding to NVAHA to support its activities.

I am confident that the combined organization will continue to serve the community, and hope that the level of engagement will be even higher as a result of this merger.

Sincerely,

A handwritten signature in blue ink that reads "Shelley S. Murphy".

Shelley S. Murphy
President/CEO

Cc: Muriel Garr
Suntrust Bank



**United Way of
Henry County & Martinsville**

PO Box 951
Martinsville, VA 24114
tel 276.638.3946
fax 276.638.6196

unitedwayofhcm.org



4/17/19

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

To Whom It May Concern:

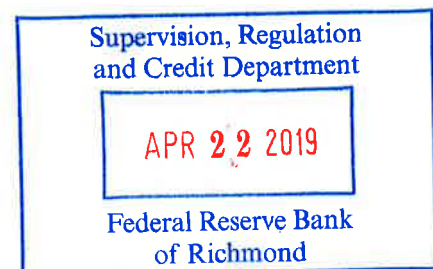
I am pleased to offer this letter of support for the merger between SunTrust Banks and BB&T Bank. Both SunTrust and BB&T have been longtime supporters of the United Way and the community of Martinsville and Henry County as a whole. These organizations provide financial support for several United Way programs that aim to improve the financial stability of low-income families throughout Martinsville and Henry County. Without their support, these programs would not be sustainable and countless individuals would not have been assisted in their quest towards a more financially stable future. In addition to the financial support provided by these organizations, they also regularly provide volunteers to support United Way programs and services. These volunteers deliver workshops on complex financial topics to low-income individuals, and assist with the implementation and operation of a variety of community based events.

The dedication of SunTrust and BB&T to improving the communities in which they work is self-evident. I wholeheartedly support the proposed merger between these institutions and look forward to continuing to work with them to help improve the lives of every individual in our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip Wenkstern", with a long horizontal line extending to the right.

Philip Wenkstern
Executive Director
United Way of Henry County and Martinsville





VOLUNTEERS IN MEDICINE, CHATTANOOGA, INC.

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Secretary

April 17, 2019

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

To Whom it May Concern:

Board of Directors

Rae Bond

Mary Gadd, RN

Becky Hall

Robert Magill, MD

Stephan Wright

I'm writing in support of the proposed merger of SunTrust Banks and BB&T. SunTrust Bank has been a longtime partner of the Volunteers in Medicine, Chattanooga Clinic. Our clinic serves the uninsured, low income adult population of Greater Chattanooga. With contributions from SunTrust, we have been able to provide more than \$1.1 million in free healthcare over just the past six years.

We are confident that with the merger of these two banking institutions, we will be able to continue providing care to the medically underserved in our community.

Robert E. Bowers, MD
Medical Director

Sincerely,

A handwritten signature in blue ink that reads 'Ashley'.

Ashley Evans
Executive Director

Ashley Wolfe Evans
Executive Director





April 16, 2019

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

To Whom it May Concern:

I write to express support for the merger of BB&T and SunTrust Banks. Both organizations have been great community supporters to our work at the Community Investment Collaborative (CIC). CIC is a 501(c)(3) non profit with a mission of assisting under-resourced entrepreneurs in starting and growing small businesses. BB&T and SunTrust have both supported our work financially, helped connect employees to our work through mentoring, serving on our microloan review committee and more. Our work to strengthen our local community and assist under-resourced individuals would not be possible with the support of both of these organizations. Their merger only strengthens their ability to assist in this work.

Sincerely,

A handwritten signature in blue ink, appearing to be 'SD', with a long horizontal flourish extending to the right.

Stephen Davis
President



Franklin-Southampton Area United Way

Sowing Seeds of Kindness in Our Community Since 1940

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Micah Dillon
1st Vice-President

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Allison Francis
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Marshall Rabil
Howie Soucek
Tamara Sterling
Scott Thomson

Executive Director

Trish Tsitsera



Franklin-Southampton Area
United Way
PO Box 366
Franklin, VA 23851
Ph: 757-569-8929
Web:
www.franklinunitedway.org
Email:
uw@uwfranklinsouthampton.org

April 12, 2019

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

Subject: SunTrust and BB&T Merger

To Whom It May Concern,

SunTrust and BB&T have both been long-time contributors to the Franklin-Southampton Area United Way through workplace giving campaigns and foundation grants. We have been fortunate to have a great working relationship with both branches in our community for many years.

We support the merger of these financial institutions that both share the philosophy of giving back to the community through philanthropy and volunteerism and look forward to working together to continue creating positive change in the City of Franklin and Southampton County.

Sincerely,

A handwritten signature in blue ink that reads "Trish Tsitsera".

Trish Tsitsera, Executive Director

CC: FDIC Atlanta Regional Office, 10 10th Street, NW, Suite 800
Atlanta, GA 30309





Commonwealth Catholic Charities
We  The Power of Hope Every Day

April 16, 2019



1601 Rolling Hills Drive
Richmond, Virginia 23229
804.285.5900 • cccofva.org

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

Dear Sir or Madam:

I am writing to express the support of Commonwealth Catholic Charities, the Commonwealth Human Services Foundation and the Commonwealth Catholic Charities Housing Corporation, all Virginia non-profit organizations, for the proposed merger between SunTrust and BB&T banks. It is our belief that this merger of equals will enable the newly created financial institution to provide superior customer services and to deepen the impact of its community development and community investment activities by becoming an even more active community partner.

For several years, SunTrust has been the financial institution of choice for Commonwealth Catholic Charities (CCC) and its supporting corporations. SunTrust provides expert and responsive services; and it is truly a pleasure to bank with an entity that supports the mission, vision and values of CCC.

SunTrust is extremely supportive of the work of Commonwealth Catholic Charities. Through philanthropic support and volunteer service, SunTrust has partnered with Commonwealth Catholic Charities to provide financial counseling and coaching services to low and moderate income individuals in both Central and Western Virginia. Together, SunTrust and CCC have supported newly-arrived refugees to navigate the financial system in the United States, have provided expert rental counseling to low income community members and have assisted moderate income families become first-time home buyers.

Not only have SunTrust associates been supportive of CCC's efforts to support low income Virginians with high quality services, they have also supported CCC's efforts to develop high quality, affordable housing. As a founding member of the Commonwealth Catholic Charities Housing Corporation board of directors, a SunTrust associate has provided expert advice, connections and guidance while exercising his fiduciary duty to the newly-created organization.

Commonwealth Catholic Charities, the Commonwealth Human Services Foundation and the Commonwealth Catholic Charities Housing Corporation have all been beneficiaries of SunTrust's community investments; we look forward to the increased capacity that this merger will create, as well as to the new initiatives, stronger partnerships, and deeper connections with the newly created institution that will emerge from the proposed combination of SunTrust and BB&T.

If I can provide further information to assist in your deliberations, please do not hesitate to contact me.

Sincerely,



Jay Brown
Chief Executive Officer

Charlottesville • Hampton • Roads • Norfolk • Norton • Petersburg • Richmond • Roanoke





NATIONAL CAPITAL AREA COUNCIL BOY SCOUTS OF AMERICA SCOUTREACH PROGRAM

To Whom It May Concern:

The National Capital Area Council, Boy Scouts of America thrives because of support from companies like SunTrust. SunTrust has played a huge role in helping us serve the unprivileged youth in our local communities. These youth would not otherwise be able to participate in the Scouting program. Because of SunTrust and their continued support, we are able to have a goal of growing our program this year. Please see below for more about our ScoutReach program and the impact that the SunTrust foundation has in our local communities.

SCOUTREACH PURPOSE

To remove obstacles that prevent at-risk youth from participating in Scouting and deliver a Scouting experience that is identical to Scouts residing in suburban neighborhoods.

SCOUTREACH VISION STATEMENT

All youth will have the opportunity to become a Scout, to advance in rank, attend summer camp and have access to positive and trained adult leaders.

SCOUTREACH VALUES

Respect for the Community. Treating all people with respect and dignity through honesty and openness to the needs of the community.

THE NEED- According to the District of Columbia Public Schools FY19 Budget, a projected 44,496 students in DC qualify for 'at-risk' funding in the 2018-2019 school year because they are a foster care student, experiencing homelessness, over age for their grade, or participate in SNAP or TANF. Youth in DC face too many challenges and set-backs, including food insecurity, unhealthy environments and housing instability. Children raised in distressed neighborhoods are offered too many chances to fail and have too few opportunities to succeed. Additionally, youth are impacted by care-givers living paycheck to paycheck, struggling to make ends meet and leaving too few hours for time with families. Single parent homes too often are forced to have children who return to an empty home after school. Young people in underserved, distressed neighborhoods in the DC metro area need adult role models they can look up to and work with on a year-round basis. Distressed neighborhoods have fewer men and women who volunteer to fill this role.

THE RESPONSE- The American Institutes for Research explains that children who participate in after school programs can reap a host of positive benefits in several interrelated outcome areas—academic, social/emotional, prevention, and health and wellness. Studies indicate that kids involved in after-school programs have higher achievement and attendance rates, are less prone to depression and burnout and experience dropout less often. Out of school activities keep children safe and protect them from risky and negative behavior.

Through the Direct Service ScoutReach program we will recruit and employ positive adult role models who serve as Scout leaders. ScoutReach was designed to attract and meet the needs and interests of youth and communities in local underserved neighborhoods and families with economic challenges. The target community organizations/schools are those with a commitment to working with youth development issues as part of an overall commitment to urban neighborhood stabilization or revitalization. ScoutReach serves the most distressed neighborhoods in Washington, DC with a fully funded Scouting program for youth ages 6-13. The Scouts meet weekly, immediately after school. The cost of uniforms, activities, camping, advancement, and summer camp are covered for all youth who wish to join. Currently, we serve 388 youth in 6 of D.C.'s public schools.

THE GOAL- To positively influence the lives of the targeted underserved youth population through activities that cultivate their skills in the six critical elements of healthy youth development:

- Strong personal values and character
- Positive sense of self-worth and usefulness
- Caring and nurturing relationships with parents, other adults and peers
- A desire to learn
- Productive and creative use of time
- Social Adeptness

THE OUTCOME- Scouts learn a sense of accountability and teamwork through the experience of outdoor learning, rank advancement, and community service. Activities are designed to be challenging yet enjoyable for the youth and teach honesty, integrity, responsibility and leadership. Through this powerful teaching method, the Scouting program promotes teamwork and self-confidence. Youth involved will develop a sustained, caring relationship with adults and will receive guidance in facing serious challenges. Scouting programs help youth to learn to make the right choices today and throughout their lifetime.

The need for this program is much greater than what our current resources can cover. The current poverty rate in D.C. is 18%, with 120,308 out of 647,654 people living below the poverty line. Our council's ScoutReach program accounts for only .6% of the 57,000 total youth that we serve. In 2019, we plan to grow ScoutReach exponentially, but we can only do this with community support. We need to do better to ensure that all children in D.C. have the opportunity to develop leadership skills, strengthen their self-confidence and their well-being through Scouting. This is why, we are so thankful for companies like SunTrust who believe in us and the programs we provide for our local communities.

Sincerely,



Jenna Welle
Chief Development Officer
National Capital Area Council
Boy Scouts of America





Greenville Chamber

April 22, 2019

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

Dear Federal Reserve Bank of Richmond:

On behalf of our Board of Directors and 1,800 member businesses, the Greenville Chamber offers its full support of the merger between BB&T and SunTrust. The Chamber has existed to help businesses grow and our community flourish for 130 years, and BB&T has been a longtime and prominent supporter of the Greenville Chamber's economy-building efforts since 1973.

I've had the privilege of working with BB&T in the various communities that I've lived in, including Kentucky, Georgia and South Carolina, where they are commonly referred to as the "Best Bank in Town"! BB&T has achieved high visibility in the markets that they serve and invest heavily not only in their own brick and mortar, but more importantly in causes and initiatives that promote community health, vitality and prosperity. BB&T continues to invest in Accelerate, the Greenville Chamber's private sector-fueled economic development initiative that provides support to high-impact entrepreneurial ventures, increases the number and performance of minority woman-owned businesses, and seeks ways to expand our area's talent pool and workforce. BB&T also sponsors various causes throughout the community, including athletic events and venues, the annual Fall for Greenville community festival, the Sweetheart Charity Ball benefiting the Meals on Wheels initiative, and so much more.

The combined BB&T and SunTrust entity will have an even greater impact on our community and all communities in which it will serve. For that reason and many more, the Greenville Chamber fully supports this merger.

Sincerely,

Carlos Phillips
President and CEO

April 19, 2019

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

Re: Supportive Comments on Behalf of SunTrust

To whom it concern,

SunTrust Bank and Goodwill Industries-Suncoast, Inc. have been business partners for many years. As early as the mid 1990's SunTrust provided the funding, through a loan, for the construction of a 200-bed residential reentry center. This center has operated at capacity continuously since opening; today Goodwill assists a waiting list of women seeking to re-enter the community after serving their prison terms. In early 2000 SunTrust supported the expansion of Goodwill-Suncoast's social enterprise, working with us to facilitate an industrial revenue bond that provided the resources needed to expand our retail business which funds our Human Service programs. Since that time, SunTrust has assisted us two more times. Goodwill-Suncoast has served hundreds of thousands of people in communities in west central Florida as a result of the expansion SunTrust supported/s. In line with our mission, many of the people we served have successfully secured work and are independent.

SunTrust has also supported Goodwill-Suncoast and its programs, especially Life Skills Development which serves men and women with developmental disabilities. For many years, SunTrust provided special incentive scholarships to individuals who excelled in the program and were able to transition successfully into community employment. Presently SunTrust supports food services training for adults with developmental disabilities; additionally, SunTrust provides staff that serve as volunteer instructors, teaching Goodwill-Suncoast team members about financial literacy. This information is essential in assisting individuals earning entry level wages and more to achieve economic stability each day.

Recently, SunTrust Bank has provided direct support for an educational seminar that will provide the tools to enhance mission service delivery via 29 different Goodwill organizations. The ideas shared at this seminar will allow each organization to implement services, policies and procedures that benefit those we serve in our respective communities, potentially impacting hundreds of thousands of people in a positive way.

Based on our long, positive history with SunTrust Bank, I believe this merger will allow the new organization to expand their influence and ability to serve companies with whom they do business and their respective communities. We look forward to the new opportunities that this merger will create.

Respectfully,



Deborah A. Passerini, M.Ed., CRC, CE
President and Chief Executive Officer
Goodwill Industries-Suncoast, Inc.

April 22, 2019

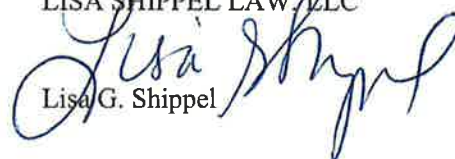
VIA U.S. MAIL

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

Dear Mr. Sir/Madam:

BB&T is an excellent community partner with a long history of community support. They invest their time into their local community. As Chairwoman of the Alpharetta Chamber of Commerce I can vouch for their commitment to the community of Alpharetta, where their employees volunteer and donate funding to support economic growth in our city. Christian Ngo is on the Board of Directors of the Chamber and is the committee chair of the Young Business Professionals group that he started. We are thankful to have a committed partner like BB&T in our community.

Very truly yours,
LISA SHIPPEL LAW, LLC


Lisa G. Shippel

CC:
comments.applications@rich.frb.org; and
Bankmergerapplication@fdic.gov



April 22, 2019

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

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

Re: BB&T and SunTrust Merger Application

Dear Madam/Sir:

This letter replies to your request for comments on the proposed merger between BB&T and SunTrust. While we take no position on the merger, we can tell you about our experience with SunTrust, its support of our organization, and the role it has played in our community. The D.C. Bar Pro Bono Center is a 501(c)(3) charitable organization that provides legal services to low-income individuals, families and small businesses and nonprofits in the District of Columbia. The Pro Bono Center is supported entirely by voluntary contributions and receives no financial support from the Bar or its members.

I have been the Executive Director of the Pro Bono Center since February 2017, and one of the first meetings I had on the job was with Jill Fields, the SunTrust Senior Vice President here in D.C. in charge of serving nonprofits. Jill and SunTrust have supported the Pro Bono Center in many ways, including attending our events and inviting our staff to participate in a community event designed to increase our ability to connect with potential supporters. Of course, one of the most important ways in which SunTrust has supported our work is financially. We have received SunTrust grants every year since 2010. We received \$5000 a year between 2010 and 2015, \$10,000 in 2016, and \$15,000 for the last two years, for a total of \$70,000. SunTrust has been one of our top three corporate donors over the last nine years. Its generous support has enhanced our ability to ensure that our neighbors of limited means have lawyers to help them stay in their homes, maintain their families, and obtain government benefits critical to their day-to-day sustenance.

In sum, SunTrust has been an important partner in our work to improve the lives of people in the D.C. community. Please let us know if we can provide any additional information as your agencies review this application.

Sincerely,

A handwritten signature in black ink that reads "Rebecca K. Troth".

Rebecca K. Troth
Executive Director

cc: Jill Fields
Muriel Garr

District of Columbia Bar
Pro Bono Center
901 4th Street NW
Washington, DC 20001
202.737.4700
www.dcbbar.org/pro-bono



F.D.I.C. Atlanta Regional Office

10 - 10th street, NW, Suite 800



Atlanta, Ga 30309-3849

Gentlemen:

We are and have been a customer of BB&T for a number of years. In past years we were a customer of SunTrust.

We have enjoyed our association with both organizations and have great respect and admiration for their business ethics, code of conduct, customer service and commitment to being good citizens of our community. Their employees and leaders are actively involved in being good neighbors and making our community a better place to live, work, play and worship.

I believe the combined resources (financial, technology and human) will be of great value to our businesses and our community and hereby express my support for the merger of BB&T and SunTrust.


Larry Benson, 

Benson's, Inc.

COB & CEO



Girls Inc. of Chattanooga
 4505 Brainerd Rd., Ste. 110
 Chattanooga, TN 37411
 (423)624-4757
 www.girlsincofchatt.org

Melissa Blevins
 CEO

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Sheila Boyington

Uneva Shaw

Dr. Sue Anne Wells

April 22, 2019

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

To whom it may concern,

I am writing on behalf of Girls Inc. of Chattanooga in support of our partner, SunTrust Bank and their proposed merger with BB&T Bank. For almost a decade, SunTrust Bank has been committed to strengthening our organization and improving the lives of girls and young women across our community; we foresee this merger as an opportunity to forge stronger partnerships with even greater impact in our community.

At Girls Inc. of Chattanooga, our mission is to inspire and prepare girls to be strong, smart and bold leaders within their families, their community and society. Since 1961, Girls Inc. has served over 28,000 girls to provide them with tools to improve academically, make smarter choices, build self-confidence, and stay focused on higher education, careers, and paving the way for a successful future. This would not be possible without the continued financial support from countless community partners, including SunTrust Bank allowing Girls Inc. to offer in school, after school and summer camp educational programs.

Our partnership began in 2010 as SunTrust Bank supported our program designed to expose students to the arts and expand their horizons. In 2012, they funded a program to encourage middle school girls to become more physically active and find adventure in the outdoors. SunTrust employees help our girls prepare for economic independence, by volunteering in programing classes designed to teach financial literacy. In all the years between and every year since, SunTrust Bank has been walking alongside our organization, helping us rewrite the future as our girls break barriers and defy expectations.

We are so grateful for the potential that SunTrust Bank sees in our girls. Without their investment, Girls Inc. of Chattanooga would not be able to impact the lives of so many girls across the community. Through our continued partnership with SunTrust Bank, we can provide more opportunities and experiences for girls and young women; because we know that when we strengthen our girls, we strengthen our entire community for years to come.

Sincerely,



Cindy Rix Chief Development Officer



April 19, 2019

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

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

To Whom It May Concern,

As a nonprofit partner of HomeFree-USA, it is my pleasure to support the merger of SunTrust and BB&T. SunTrust has supported Wealth Watchers Inc. in the Jacksonville and larger North Florida area. Suntrust has provided financial support to Wealth Watchers Inc. which has assisted us in providing over 2400 individuals with counseling and education services. We are also able to assist 150 individuals purchase their first home, which had a financial impact of over \$10 Million in the local economy. Suntrust is committed to the growth of homebuyers and homeowners not only in North Florida, but across the United States.

I hereby support this merger and wish SunTrust greater success.

Sincerely,

Carrie Davis
President and CEO

Eike, Kathy

From: Mike Reinhardt <r3inhardt@gmail.com>
Sent: Monday, April 22, 2019 4:07 PM
To: RICH BankSup Applications Comments; FDIC Atlanta Regional Office, Merger
Subject: [External] Support of the merger between BB&T and SunTrust
Attachments: image003.jpg

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

Ladies and Gentlemen, I am writing in support of this merger since I am a client of both institutions, recognize their combined assets represents increased services to our community and our community partners.

BB&T has contributed to our success as a Toyota and Lexus Dealer by funding our inventories as well as our growth into new facilities which allow us to attract and serve more employees and customers. Both BB&T and Suntrust give our customers access to competitive funding options for their purchases.

BB&T also supports and serves our community and some of the same community partners that we choose to support.

We support the merger and believe the combined services will benefit our community, our community partners and employees.

Mike Reinhardt
General Manager
gm60102@toyota.com
www.reinhardtlexus.com
(334) 306-3672



アガベ

Eike, Kathy

From: Jay Reeve <jayr@apalacheecenter.org>
Sent: Monday, April 22, 2019 4:39 PM
To: BankMergerApplication@fdic.gov; RICH BankSup Applications Comments
Cc: Sullivan, Paul
Subject: [External] Letter of support

NONCONFIDENTIAL // EXTERNAL

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

This is a letter of support for BB&T regarding their proposed merger with Sun Trust. I am very happy to have the opportunity to underline our trust in BB&T. Apalachee Center, Inc. is the largest community mental health center in this part of North Florida. We are a not-for-profit with typically thin margins, and its crucial to our mission to have the support of a community friendly bank who understands the needs of community healthcare providers. BB&T made it possible for us to finance the construction of a large, desperately needed inpatient psychiatric facility in 2011, and was an excellent partner throughout that process. They have been extremely responsive to our institutional needs, and have worked with us to develop rate structures and debt service plans that allowed for a responsible repayment of our construction loan while recognizing our not-for-profit status and our need to hold costs low. We were so impressed with BB&T's commitment to community healthcare and good community stewardship that we subsequently contracted with them to manage our retirement plan, which they have done skillfully and, again, bearing in mind our not-for profit status. This partnership has brought jobs to our community and dramatically increased access to emergency behavioral healthcare. I am entirely in support of the proposed merger, and believe that it will be good for this community and for Apalachee Center.

Jay Reeve, PhD

President and Chief Executive Officer

Apalachee Center, Inc.

2634-J Capital Circle NE

Tallahassee, FL, 32308

office (850) 523-3213

fax (850) 523-3434

web: <http://apalacheecenter.org/>

<http://eastsidepsychiatric.org/>





April 22, 2019

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

At Family Foundations, we were excited to hear about the impending merger between SunTrust and BB&T; we are looking forward to doing business with the combined entity. The fact that both organizations are based in the South is particularly important to us since a regional understanding of the opportunities and challenges in our local market has always been a distinguishing trait in our relationship.

Family Foundations maintains a warm and cordial relationship with the SunTrust personnel here in Jacksonville, Florida. The CRA personnel have been very attentive over the years offering their help in many ways. Both Brian Parks and Lauren Butler have worked with us on local business opportunities in our Financial Education practice, as well as being tireless supporters of our annual Wi\$e Money Week initiative, providing both monetary and volunteer support. We have also enjoyed the tireless work provided to us by Joe Carney, who graciously served for many years as a trusted and valued board member, serving in various roles as head of governance and then as our treasurer. Finally, SunTrust is our local banking relationship. The work of Tammy Molter and her team is impeccable and makes our transactional work seamless.

Good luck as you move down this important merger track. We look forward to maintaining the cherished relationships we have forged with our partners at SunTrust.

Sincerely,



William J. Haley
President & CEO

Future Foundation

prepare to stand out

April 19, 2019

SunTrust Bank
Mr. Bill Rodgers, President and CEO
303 Peachtree Street, N.E.
Atlanta, GA 30308

Dear Mr. Rodgers,

Please accept our sincere thanks for SunTrust Bank's support of the Future Foundation of Atlanta over the past several years. We are proud to collaborate with SunTrust Bank and are grateful for the bank's continued commitment to our mission.

It is our understanding that SunTrust Bank has or will soon be filing a merger application with Federal Regulatory Agencies to merge with BB&T Bank. We understand this proposed merger will serve to strengthen SunTrust Bank's position in our communities in Atlanta. Future Foundation of Atlanta would like to express support for the proposed merger between SunTrust and BB&T Banks.

Since 2010 SunTrust Bank has grown to be one of our strongest corporate partners, providing volunteer bank employees to provide financial literacy opportunities to families and children who need their support the most. As one of our largest corporate investors in our vision to end generational poverty, SunTrust bank has invested critical capacity building and operating support in the program and operating needs of our organization. As a result of the bank's capacity building investments, Future Foundation was able to implement critical infrastructure needs which helped increase revenue by 20% in 2018. The revenue increase allowed Future Foundation to increase the number of students served during the 2018-2019 school year.

SunTrust Bank's experience and commitment to providing resources and technical assistance support to non-profits demonstrates their commitment to community. The bank is aligned with our mission and goals and we feel the proposed merger will continue to bring increased contributions to our community and new market areas through their ability to provide access to technical assistance, critical operating dollars, and community investments.

Future Foundation fully supports the possible merger of SunTrust and BB&T Banks.

Sincerely,



Qaadirah Abdur-Rahim
CEO, Future Foundation

cc: Tom Barkin, FRB (Richmond)
Michael J. Dean, FDIC





Board of Directors April 20, 2019

Yoly Davila
Chair
BBVA Compass

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

Brian A. Hall
Vice Chair
Traverse Legal, PLC

Dear Federal Reserve Bank Representatives,

Robert Franco Jr.
Past Chair
Texas Capital Bank

On behalf of PeopleFund and the women, veterans, minorities, ex-offenders, and low income entrepreneurs we serve, please accept this letter of support for Business Bank and Trust (BB&T) in consideration of their pending merger with SunTrust. Our work to create economic opportunity for those marginalized by the financial mainstream relies upon the generosity and partnership of financial institutions like BB&T.

Mike Perrine
Treasurer
Baker Tilly

The growth of both BB&T and SunTrust represents a unique opportunity to expand economic development and break down barriers so more Americans can access the financial mainstream and obtain their piece of the American Dream.

Donna C. Normandin
Secretary
Frost Bank

Kathy Duncan
Burrell
Bank of America

During our partnership with BB&T, we have lent over **\$75 million**, provided **96,000 hours** of business education and created **4,000 jobs** for those who need it most. Financial support from community banks like BB&T, along with volunteer engagement, is critical to the success of our clients.

Jeffrey L. Boney
Texas Business
Alliance

Your partnership brings small business dreams to life for people like Andrea, who opened a small chocolate shop in a low income area of Dallas so she could work with her daughter and granddaughter. *"PeopleFund has helped us in so many ways with answering our businesses questions and helping us with our financial needs."* – Andrea Pedraza, Owner and Founder, *CocoAndre Chocolatier*

Veronica Briseño
City of Austin

Eric M. Bustos
Capital Metropolitan
Transportation
Authority

We welcome the opportunity to share more with you about the many ways banks like BB&T can expand their community commitment as they merge, grow, and expand their financial footprints. My direct contact information is below and we thank you for your time,

Larry Conley
JPMorgan Chase
Bank

Respectfully,

A handwritten signature in black ink, appearing to read "Gary Lindner".

James Nortey, II
Morgan Lewis

Gary Lindner, President & CEO

Nina Nelms
Senior Vice
President
Bank of America

PeopleFund
512.222.1015

gary@peoplefund.org

Cecilia Castelo
Vice President
Retail Banking
Woodforest
National Bank

AUGUST 15, 2010

This letter is part of the **RIG Complaint** File that outlines the racial and Zip Codes divisions in Houston. The banking complaints highlight the entrenched systemic, pervasive and continuing illegal discrimination, redlining and denial of equal access to capital – as a direct result of the **Bank lending and credit policies** – of whole neighborhoods of the protected class of black Americans by the Banks named in the **RIG** banking complaints.

The specific neighborhoods that are aggrieved by the **Bank lending and credit policies** that deny the equal access to capital and credit and result in the disproportionate discriminate effect perpetrated against the protected class of black Americans in **Houston** are:
77004,77003,77076,77074,77020,77035,77013,77029,77026,77023,77054,77016,77093,77033,77009,77022,77018,77043,77006,77024 and 77021.

These neighborhoods suffer from the discriminatory effect of the bank policies that **denies equal access to Capital** – the very capital that is needed to make these neighborhoods whole. The black Americans in these **Zip Codes** are further aggrieved by the Banks deliberate refusal to solicit business and refusal to advertise the loan products and to provide the banking services in these neighborhoods – the way it does for the Anglo Zip Codes. Beyond this these neighborhoods are denied the equal **Bank branches – free-standing edifices- and** bank financed developments that stabilize neighborhoods. The citizens in these Zip Codes also are aggrieved by the unequal availability of mortgages, home equity loans and business loans and by the **Disparate Treatment** from these Banks.

The comparative neighborhoods – Anglo Zip Codes – that benefit not only from a disproportionate number of Bank branches – free-standing edifices – but also from the Bank officers actively seeking out the citizens and businesses in these Zip Codes to make sure all of their capital and credit needs are met. The Zip Codes favored by these Banks are:
77024,77063,77380,77098,77087,77057,77007,77019,77027,77009,77042,77494,77076,77077,77002,77041,77008,77056,77478,77058,77046,77062,77030,77092,77304,77384,77546,77079,77401,77060,77065,77084,77339,77345,77346,77388,77505 and 77055. In these neighborhoods developers have received millions of dollars in signature loans and lines of credit with little or no collateral- similarly situated black American developers are denied same and prospective Anglo home-owners are not relegated to more costly loans the way similarly situated black Americans are

Where the homebuyers in the Anglo neighborhoods request home equity loans to maintain their property values the banks not only immediately grant these loans but have waived whatever credit marks to guarantee loan approval. Where business owners in the Anglo Zip Codes apply for loans and lines of credit the Banks counsel the applicants and waive credit marks to get the business loans approved. As no such counseling or waiver by the Banks is granted to the black American applicants the first set of Zip Codes suffer disproportionately as a result of the Bank policies. Negative credit marks are not a **“death sentence”** for the Anglo Zip Codes the way the same credit marks are for the protected class of black Americans in the first set of Zip Codes.