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March 4, 2021

VIA E-Apps

R. Ryan Schilling
Banking Supervisor
Applications & Enforcement
Federal Reserve Bank of Cleveland
150 East Fourth Street
Cincinnati, Ohio 45202

Re: Application to the Federal Reserve by Huntington Bancshares Incorporated to Acquire TCF Financial Corporation – Follow-on Response to the Additional Information Request dated March 4, 2021

Dear Mr. Schilling:

Please find attached our confidential response (the “Confidential Response”) to a follow-on additional information request, dated March 4, 2021, concerning the application by Huntington Bancshares Incorporated (“Huntington”), requesting approval of the Board of Governors of the Federal Reserve System (the “Federal Reserve”) to acquire by merger TCF Financial Corporation (“TCF”), with Huntington as the surviving entity, pursuant to sections 3(a)(3) and 3(a)(5) of the Bank Holding Company Act.

R. Ryan Schilling
March 4, 2021
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Request for Confidential Treatment

Confidential treatment is respectfully requested under the federal Freedom of Information Act, 5 U.S.C. § 552, and the Federal Reserve's implementing regulations, for the information contained in the Confidential Response (the "Confidential Information"). The Confidential Information includes confidential financial information of Huntington, The Huntington National Bank ("Huntington Bank"), TCF and TCF National Bank ("TCF Bank"), and information regarding other matters of a similar nature. This information is not the type of information that would otherwise be made available to the public under any circumstances. All such information, if made public, could result in substantial and irreparable harm to Huntington, Huntington Bank, TCF and TCF Bank. Certain information in the Confidential Information also includes confidential supervisory information, which is protected from disclosure. In addition, potential investors could be influenced or misled by such information, which is not reported in any documents filed or to be filed in accordance with the disclosure requirements of applicable securities laws, as a result of which Huntington and TCF could be exposed to potential inadvertent violations of law or exposure to legal claims. Accordingly, confidential treatment is respectfully requested with respect to the Confidential Information under 5 U.S.C. §§ 552(b)(4) and (b)(8) and the Federal Reserve's implementing regulations. Please contact Richard K. Kim or me if this request for confidentiality cannot be honored for any reason, to allow Huntington, Huntington Bank, TCF and/or TCF Bank to take appropriate steps to protect such information from disclosure.

If you have any questions about this submission or confidential treatment request, please feel free to contact Richard K. Kim at 212/403-1354 or me at 212/403-1330.

Sincerely,

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

Jeffrey A. Watiker

Attachment

cc: Richard K. Kim

Response to Federal Reserve Follow-on Additional Information Request
dated March 4, 2021

(Response filed March 4, 2021)

As a follow-up to Huntington's supplemental response to item 15 of the additional information request dated February 2, 2021, show supporting calculations for TCF's Method 1 score as of September 30, 2020.

Please see the attached for responsive information.