


November 2, 2022

Delivered electronically via email to: 

Barry Simmons
Chairman
Renaissance Indexes Group
7000 Fonvilla Street Suite # 2310
Houston, Texas 77074

Re: Community Reinvestment ACT (CRA) Public Comment Letters
dated August 15, 2022 and August 17, 2022

Dear Mr. Simmons,

Truist Bank acknowledges receipt of your comment letters sent to the Federal Deposit Insurance Corporation (FDIC). Although your letter dated August 17, 2022 references Frost Bank (please see excerpt below from page 7/14) and the data included in both letters are not specific to Truist bank, we are eager to share how Truist has and continues to support our communities.

“Where the Claim states that **the named Bank** has denied the equal marketing, promotion and making of its lending to the protected class of black Americans in the specified Zip Codes and its lending equals **1.1%** of total lending portfolio to the black American Neighborhoods and that the “peers” lending only equaled **1.0%** of total lending portfolio **Frost Bank** does not get as free pass for “discriminating less” against the protected class of black Americans. In both instances the protected class of black Americans is denied the Equal lending that the law calls for and the lending is marginal by comparison to the Anglo Zip Codes in Houston and in Dallas.”

At Truist, we are guided by our purpose to inspire and build better lives and communities. We’re proud of our community development efforts, including our “Outstanding” CRA rating covering the period 2017-2019. Our CRA performance rating highlights our commitment to re-invest in our communities through lending, investments and services to help low and moderate-income individuals and communities grow and thrive. This includes a focus on majority minority individuals and communities.

In our CRA Performance Evaluation, the Lending Test performance in the Dallas MD Assessment Area reflected a good responsiveness to the Assessment Area credit needs. Truist demonstrated a significant use of complex investments to support community economic development initiatives in the form of housing and New Market Tax Credits. Truist was also a leader in providing Community Development Services including teammate participation in 247 Community Development Services. Lending in the Houston Assessment Area reflected a good responsiveness to the Assessment Area’s credit needs, and a leader in making loans in the Houston Assessment Area. Truist originated 25 Community Development Loans totaling \$129.4 million, and an excellent level of qualified Community Development and Investment grants totaling \$19.1 million. Teammates in the Houston Assessment Area participated in 115 Community Development Services.

As of August 2022 (on a pro-rated basis), Truist has achieved the overall goal for its \$60 billion Community Benefits Plan (CBP). The CBP was developed following six community listening sessions and two public hearings with the benefits from the ongoing advice and accountability of a Community Advisory Board that includes leaders from leading nonprofits, community development financial institutions and community advocates from across the Truist footprint. This is a concrete example of our commitment to supporting investments across the communities we serve. It includes:

- \$31 billion for home purchase mortgage loans to LMI borrowers, LMI geographies, minority borrowers and majority-minority geographies.
- \$7.8 billion for lending to small businesses and to support the growth of small businesses with revenues less than \$1 million.
- \$17.2 billion in Community Development Lending (CDL) to support affordable housing development, small business growth, and lending to nonprofits that support the LMI community.
- \$3.6 billion in Community Reinvestment Act (CRA) Qualified Investments and Philanthropy, of which \$120 million will be designated for CRA-qualified philanthropic giving.

Lastly, we like to highlight another example of how Truist re-invests in our communities as well as the state of Texas. Truist recently made a significant investment in the **People's Fund** which creates economic opportunity and financial stability for underserved people by providing access to capital, education and resources to build healthy small businesses. This includes supporting minority, women and veteran owned small businesses. The PeopleFund's Black, Indigenous and People of Color (BIPOC) Business Accelerator consists of the creation of capital-oriented cohorts business owners in underserved areas around Texas with the goal of increasing access to capital for this group by improving the credit profile and business acumen of early-stage entrepreneurs.

Thank you for the opportunity to address your concerns and provide more information on how Truist is supporting our communities throughout our footprint. To learn more, we encourage you to visit our website at <https://www.truist.com/>.

Sincerely,
Anthony L. Weekly
Anthony L. Weekly
EVP, Chief CRA Officer

CC:
Sherri W. Brown
Acting Deputy Regional Director
Federal Deposit Insurance Corporation

FDIC

ATTN: Art Khan /

RE: Banking Complaints – Truist Bank

August 17, 2022

Pretexts / Illegal Discrimination

The **Renaissance Indexes Group** (RIG, Complainant) in work in the cause for the Equal access to capital, lending and banking services for the under-served protected class of black Americans and to correct, fix and end the continuing Bank practices of illegal discrimination and redlining that this class is aggrieved by outlines the pretexts for illegal discrimination and redlining used by the named Banks – **Truist Bank** – and up until now, have been accepted by the regulators.

in continuing Agency sanctioned illegal discrimination and redlining that enables the Banks named in the Complaints to continue the practices, actions (and non-actions) and policies that denies the full enjoyment of Equal rights secured under the banking laws to the protected class of black Americans in the black American Neighborhoods in the specified Zip Codes in Houston (and in Dallas).

The RIG has filed several CRA Protest and banking complaints with **the Agencies** – Dallas / Atlanta against Banks in Houston that are engaged in the systemic, pervasive and continuing practices and actions that result in the disparate impact and in the disproportionate discriminate effect on the individuals, businesses and households in the black American Neighborhoods in the specified Zip Codes in Houston and in Dallas.

In the free exercise of its **Due Process Rights** to frame the Complaints the RIG has clearly outlined the specific parties that are aggrieved by the continuing practices and actions by the Banks – the protected class of black Americans in the specified 21 Zip Codes in Houston (and in the specified 26 Zip Codes in Dallas)

It is in these specific Neighborhoods and it is these specific individuals, businesses and households that the defendant Banks named in the RIG Complaints have

--structured its business in such a way as to avoid the credit needs and has placed its Bank branches, bank financed developments and Community Development Loans outside of the specific Neighborhoods and census tracts named in the Complaints

-has denied the **Equal opportunity** to apply for and receive the Equal lending in any of the lending categories – home mortgages, home equity, business, commercial lending and construction loans

--has denied the Equal investments in **advertising**, marketing and promotion of its lending and credit products, in **community outreach** to include the denial of any capitalized CRA Partnerships and capitalized Neighborhood Group Alliances and had denied the Equal **charitable contributions** – underwriting of Charity Galas, sponsorship of Neighborhood Events and taking the lead in any Capital Campaigns for any black American Organization or Non-Profit Corporation.

The RIG is specific in the Complaints in the specific naming of the individuals, businesses and households in the black American Neighborhoods in the specified Zip Codes in Houston (and in Dallas.)

The consistent and continuing denial of Equal Bank branches, bank financed developments and Community Developments Loans by the named Banks to the black American Neighborhoods is verified by the physical addresses of where the Bank branches – brick and mortar free standing edifices, bank financed developments – stores, supermarkets, office towers, apartment complexes, restaurants and luxury mixed use developments are placed and where the above is not placed – that happens to demarcate by racial and Zip Code divisions in Houston (and in Dallas)

The geographical distribution of the named Banks' lending and credit products – in all of the categories - and where the lending is advertised, promoted and made and where the lending is not promoted and not made just happens to demarcate by racial and Zip Code divisions.

The investments in advertising – annual advertising contracts, sizes, amounts and frequency – and in which newspapers and Media outlets placed and not placed, the number of and dollar amounts of the community outreach and in which Neighborhoods the community outreach is placed and not placed and the number and dollar amounts of the Banks charitable contributions to include the underwriting of Capital Charity Events in number and in dollar amounts and where and in which Neighborhoods the charitable contributions are placed and not placed – just happens to demarcate by racial and Zip Code divisions.

Any objective review of the facts clearly manifests that in all of the above banking categories the named Banks have placed the vast majority – if not all – of the Bank

branches, bank financed developments lending, outreach, advertising and charitable contributions **outside** of the black American Neighborhoods

This is not the issue in the RIG Protest Complaints – the issue is how the Banks are allowed to get away with these continuing and repulsive practices with the governmental support of the Agencies – the same “**governmental support**” denounced and highlighted by Justice Anthony Kennedy in the ruling in **TDHCA V ICP, Inc.**(2015) that established liability under the Fair Housing Act for any Bank or lender practices and actions that result in the disparate impact on the protected classes – to include the protected class of black Americans

Pretexts / Illegal Discrimination

The RIG has the right to frame the CRA Protest Complaint and the banking complaints (Complaints) filed with the banking regulatory Agencies. The Claimant is entitled to honest investigations pursuant to the Complaints. Up until now the Claimant has been denied these rights by both the Banks named in the Complaints.

The RIG outlines where the named Banks and the Agencies have consistently denied the Claimants’ Rights to frame the Complaints. The RCG has filed several complaints with **the Agencies** against Banks in Houston for the systemic, pervasive and continuing practices, and actions (and non-actions) and policies

--that deny the Equal rights and that deny the full enjoyment of same to the protected class of black Americans in the specified Zip Codes in Houston (and in Dallas)

--that are in violation of the banking laws, CRA, ECOA, FHA – to include the Final Rule, HMDA, Fair Lending Laws, Regulation B, FTC Act-Section # 5, in violation of the Civil Rights Laws – Title VIII – 1968 Civil Rights Act and of the Constitutional laws – Equal protection Clause – 14th Amendment – US Constitution

-that deny the rights and protections secured under the court holdings that apply to the Complaints proceedings – US Supreme Court case – **TDHCA V ICP, Inc.** – that established liability under the Fair Housing Act for any housing, Bank or lender practices or actions that has the disparate impact on protected classes – to include the protected class of black Americans

US V Hudson City Savings Bank that expanded the liability under the Equal Credit Opportunity Act for any practice or action that denies the Equal access to capital or that discourages the protected classes from applying for credit transactions – to include the Banks continuing practice of placement of its Bank branches **outside** of the black American Neighborhoods Banks

US V Midland States Bancorp the Court ruled that the continuing failure of the Bank to market and to advertise **the full range of all of the Banks' lending and credit products and the banking services** and where the Bank fails to penetrate the market of the protected class of black Americans this continuing practice is in violation of the Equal Credit Opportunity Act and of the Fair Housing Act – to include the Final Rule.

FHA Final Rule – the new rule from the Department of Housing / Urban Development that is part of the banking laws and is part of the Banks responsibilities under the **Fair Housing Act** –and that applies to the banking complaint investigation proceedings – the Final Rule shifts the burden of proof to the Banks pursuant to complaints and obliges the named Bank to present the legally sufficient justification to prove that the practices challenged in the Complaints are necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests – and these interests – where legitimate – could not be achieved by another practice that has a less discriminatory effect.

The Claimant has been consistent and clear in the framing of the Complaints filed with the **HUD**– that the parties aggrieved by the practices, actions and policies of the named Banks are the protected class of black Americans in the black American Neighborhoods in the specified Zip Codes in Houston (and in Dallas)

In every single investigation into the RIG Complaints the **banking regulators** have reframed, remade and reconstituted the RIG Complaints to suit its and the named Banks purposes – and has made the Complaint unrecognizable to the Claimant. Beyond this the Agencies have allowed and enabled the named Banks to reframe, remake and to reconstitute the RIG Complaints. This consistent tampering with the Complaints violates the Due Process Rights of the Claimant – to include the right to frame the Complaints

Where the **Illegal Discrimination Claims** IDC) s in the Complaints states and manifests with physical address and geographical dollar amounts reality that the named Banks have placed its Bank branches, bank financed developments and Community Development Loans **outside** of the black American Neighborhoods the IDC – pursuant to the rule of law and to the rights of Claimant these IDCs stand on their own merits and are to be investigated on their own merits

The IDCs are either true or are to be refuted with the Banks physical address and geographical dollar amounts evidence – rather than apply this lawful standard to the investigation the **Agencies** and the Bank places the RIG Complaint on hold with respect to the black American Neighborhoods and scrambles to go find Bank branches, bank

financed developments and CDLs' in other census tracts that are all outside of the black American Neighborhoods

The **Agencies** and the named bank claims that the Bank is to get a free pass on the IDC that denies the Bank branches, bank financed developments and CDLs to **the black American Neighborhoods** in the specified Zip Codes in Houston and in Dallas because the **HUD** and the Bank have made marginal findings of the above

--in a "minority census tract" -- that happens to be outside of the black American Neighborhoods

--in a "majority-minority census tract" that happens to be outside of the black American Neighborhoods

--in a "LMI census tract" that happens to be outside of the black American Neighborhoods

-in a "Hispanic census tract" that happens to be outside of the black American Neighborhoods

=-in a "high minority census tract" that happens to be outside of the black American Neighborhoods

All of the "findings" by the **Agencies** and by the named Banks happen to be outside of the black American Neighborhoods -- in some cases 30 miles away from the nearest black American Neighborhoods.

The failings of these marginal findings by the **Agencies** and by the Bank are obvious -- the "findings" do not correct, fix or end the practice of illegal discrimination of the above and in fact enables and encourages the named Bank to continue in its unlawful practices and actions that deny the full enjoyment of rights to secured under the CRA, ECOA, FHA -- Final Rule, HMDA, Fair Lending Laws, FTC Act- Section # 5, Title VIII -- 1968 Civil Rights Act to the protected class of black Americans in Houston and in Dallas.

The **Agencies** - in assisting the Bank in these marginal findings - is allowing the Bank to escape the Claims by marginal "findings" outside of the black American Neighborhoods is providing the named Banks the very kind of "governmental support" denounced as repulsive by Justice Anthony Kennedy in the landmark ruling in **TDHCA V ICP, Inc.** that established liability for the very Bank practices outlined in the RCG Complaints.

The “findings” outside of the black American Neighborhoods do not correct, fix or end the injustices perpetrated against the protected class of black Americans inside of the black American Neighborhoods in the specified Zip Codes in Houston (and in Dallas.)

As the black American Neighborhoods are still denied the Bank branches, bank financed developments and Community Development Loans by the Banks named in the Complaints

These are **pretexts for illegal discrimination** and for continued illegal discrimination perpetrated against and for the continued redlining of the black American Neighborhoods – in the specified Zip Codes.

LENDING

Where the IDC states and manifests that the named Bank has consistently denied the individuals, businesses and households in the underserved black American Neighborhoods the **Equal** marketing, promotion and making of the lending and credit products in all of the lending categories and real estate related transactions – home mortgages, home equity, business, commercial lending, construction loans -pursuant to the rights of the Claimant – the Claim is to be investigated on its own merits

The named bank has either made the lending equally available to the protected class of black Americans – as verified by the geographical dollar amounts – or the Bank has not.

The Banks’ argument that the glaring disparities in the numbers, amounts and terms of lending – mortgages, home equity and business – are based on credit scores, debt-to-income ratio and loan to value ratios are not realistic; not true and are pretexts for continued practices of illegal discrimination. Indeed, in the landmark undercover reporting titled “The Color of Money” – Atlanta Journal Constitution – the facts were all too clear: the disparities in credit scores between black Americans and Anglo Americans were nowhere the wide margins claimed by the Banks to justify the denial of lending to black Americans.

Worse than this, the report discovered that even where black Americans had higher incomes, had larger savings and had more collateral compared to Anglo Americans they were still denied the mortgage and business lending. Even in those cases where black American were approved the lending packages were expensive and toxic- this is evidenced even today in the federal court case **City of Miami V Bank of America**.

Even where black Americans and Anglo Americans have the same “credit marks” and credit scores the former are approved and the latter re denied

Rather than investigate the Claim in accordance with the New Standards – to include the FHA Final Rule – as the law demands – and as the Claimant is entitled to - **the Agencies** reframes, remakes and reconstitutes the Claims to suit the Banks purposes and allows the Bank to “represent” that it has made loans in the “**minority census tracts**”, in “**majority-minority census tracts**”, in “**LMI census tracts**” in “**Hispanic census tracts**” and in “**high minority census tracts**” -

that all happen to be outside of the black American Neighborhoods in the specified Zip Codes in Houston (and in Dallas.) It has degenerated to the point that in the **Bank Complaints** all the Bank was able to escape the **IDC in lending** by stating to the Agencies that the Bank “has made loans near the Zip Codes specified by Mr. Simmons”.

This is what we have come to in the relentless pursuit of justice – the Bank named in the Complaint need not make any lending – much less equal lending – **inside** of the black American Neighborhoods and to **the actual protected class of black Americans** – in order to get off on the Claim all the named Bank need do is to “represent” to the Agencies that it has made loans “near the specified Zip Codes of black Americans.

This is a pretext for illegal discrimination with “**governmental support**” – and enables the named banks to continue in its practices, actions (and non-actions) and policies that continue to deny the Equal rights to secure equal credit transactions to the protected class of black Americans in Houston and in Dallas

The **Agencies** has denied the Claimant the right to honest investigations and has consistently refused to investigate the Complaints on their own merits in a claim that the named “**bank outperformed its peers**” – with respect to the IDC.

This “analysis” also fails and continues to deny the protected class of black Americans their equal rights and equal protections under the laws – where the “peers” are also engaged in practices and actions that result in illegal discrimination and that have the disparate impact and disproportionate discriminate effect on the protected class of black Americans.

Where the Claim states that **the named Bank** has denied the equal marketing, promotion and making of its lending to the protected class of black Americans in the specified Zip Codes and its lending equals **1.1%** of total lending portfolio to the black American Neighborhoods and that the “peers” lending only equaled **1.0%** of total lending portfolio Frost Bank does not get as free pass for “discriminating less” against

the protected class of black Americans. In both instances the protected class of black Americans is denied the Equal lending that the law calls for and the lending is marginal by comparison to the Anglo Zip Codes in Houston and in Dallas.

This is a pretext for illegal discrimination that enables the Banks to continue the practices and actions that deny the protected class of black Americans their Equal rights under the law – with the “governmental support” provided by the **Agencies**.

Advertising

Where the IDC states that the named banks have denied the equal advertising to the black American Media outlets in Houston and in Dallas and that the Banks does not have a single **annual advertising contract** with a single black American Media outlet, that the investments in advertising is **marginal** by comparison to the general and Anglo Media and that the Banks consistently fail to promote all of the lending and credit products – especially in mortgages, home equity and business lending – to the black American Neighborhoods.

This IDC is to be investigated on its own merits and in accordance with the rule of law – to include the **FHA Final Rule**. Instead the **HUD** and the named Banks scramble to go find marginal advertising in a “minority newspaper” in a “Hispanic TV station” and in an LMI census tract” –that all happen to be **outside** and not part of the black American Media outlets –

In the case of **the above Bank** the black American Media outlets are relegated to 1 or 2 small black and white 1 / 4-page advertisements per month – that does not promote any of the favored lending and credit products that is promoted in the Anglo oriented Media Outlets. The **HUD** accepts these marginal minimums in placement as equal advertising in the black American Media outlets.

This is a **pretext for illegal discrimination** – as the black American Media outlets are still denied the Equal advertising, marketing and promotion of the lending and credit products – despite the marginal findings outside of the black American Media outlets. This continuing practice and action of Prosperity Bank is violation of the controlling authority of the Court ruling in **US V Midland States Bancorp**

Community Outreach

The IDC states that the named Banks have denied the Equal investments in community outreach to the black American Neighborhoods in the specified Zip Codes and has failed to establish a **single** capitalized CRA Partnership, a **single** Neighborhood Group Alliance. Then named Banks have failed to conduct the equal credit needs assessment,

product development and have failed to inform the residents, businesses and households in the black American Neighborhoods of the availability of credit – pursuant to the rule of law and to its responsibilities under the CRA, ECOA and FHA – to include the Final Rule.

The truth of the IDC in community outreach is borne out by the stark and glaring differences in the dollar amounts invested in and in the number of community development initiatives that the named Banks have denied to the Neighborhoods that happen to demarcate by race and Zip Code divisions – the protected class of black Americans.

The Banks have been allowed to get away with this stark and glaring denial of Equal community outreach to the black American Neighborhoods by representing to the **HUD** that it has “implemented plans to help serve the needs of historically underserved neighborhoods focusing on majority-minority census tracts.”

These are pretexts for continued illegal discrimination perpetrated against the protected class of black Americans in the specified Zip Codes in Houston (and in Dallas)

Nowhere does the Agency examiners and investigators find and nowhere does the Bank state as fact that it has actually **increased in actual dollar amounts** the lending of the “historically underserved neighborhoods” - and nowhere does the Bank mention anything it has done in the black American Neighborhoods. The Banks “**represented**” that it has implemented plans...” What did the independent Agency investigations find?

What is the timeline on these Bank plans? What is the amount to go to the black American Neighborhoods?

The Banks “represented” that it has strengthened its CRA risks. What did the independent **HUD** investigation find with respect to any capitalized CRA Partnerships and increased lending in the black American Neighborhoods?

The **HUD** claims that the Bank claims that it has developed a “branch strategy to help serve the credit needs of minority neighborhoods. Does the Bank “branch strategy” include the black American Neighborhoods? If so what are the number of the Banks branches found in the actual black American Neighborhoods? What is the number of Bank branches the **Agencies** concluded that are needed to make Equal in the specified Zip Codes of the protected class of black Americans? Of the last several New Bank Branch Applications approved by the Agencies were any inside of the actual black American Neighborhoods in either Houston or in Dallas? If so, how many and where in

the black American Neighborhoods are the **Bank** branches – as in actual physical addresses in the black American Neighborhoods in Houston or in Dallas?

These are **pretexts for illegal discrimination** – where the Banks are enabled and allowed by the **Agencies** to dance around the Illegal Discrimination Claims and to substitute the actual answers to the Claims with “representations”, “implemented plans” and “developed branch strategy” – with no specific dollar or investment amounts, with no timelines for execution and with no mention of anything the Banks have done or plans to do in the black American Neighborhoods in Houston nor in Dallas – and worse than this with no independent **Agency** verifications of any of the Bank “representations”.

Such are the continuing and tragic supervisory failings and enforcement lapses of the Agencies – made all the more tragic in the **Agency** consistency to protect the named Banks from the deep, wide Color of Money investigation and enforcement actions that the rule of law calls for and that the Claimant is entitled to.

This is the tragic “governmental support” that is part of the historical legacy of institutionalized illegal discrimination – that was highlighted by Justice Anthony Kennedy in the landmark ruling in **TDHCA V ICP, Inc.** – that established liability under the Fair Housing Act - for any Bank or lender practice or action that has the disparate impact on the members of a protected classes – in that case and this one – the specific protected class of black Americans.

By these continued applications by the **Agencies** to the RIG Complaints the named Banks will be allowed to continue to deny and be allowed to get by without building a **single** Bank branch, a **single** bank financed development or a **single** Community Development Loan (CDL) in a **single** black American Neighborhood in a **single** specified Zip Code in Houston or in Dallas – **from here until eternity** – as long as the Bank “represents” statements to the Agencies and as long as the Agencies stumbles upon a Bank branch bank financed development or CDL in a “minority census tract” – that is outside of the black American Neighborhoods

The Banks will be able to get by and allowed to continue to deny the Equal lending in all of the lending categories and not make a single increase in lending to a single black American Neighborhood in a single specified Zip Code in Houston or in Dallas – **from here until eternity** – as long as the Bank “represents” that it has intends to “implement vague plans” - and as long as the **Agencies** (or the Banks) stumbles upon marginal lending in a “minority census tract” –or in Zip Codes “near the specified Zip Codes” in the RIG Complaint - that is **outside** of the black American Neighborhoods

The named Banks will be allowed to get by and to continue to deny the Equal advertising, marketing and promotion of lending and credit products to the black American Media – **from here until eternity** - as long as the Bank “represents” that it has plans to increase marketing in minority newspapers and Media – that are all outside of the black American Neighborhoods

to continue to deny the Equal community outreach to include the denial of a single capitalized **CRA Partnership** or a single capitalized **Neighborhoods Group Alliance** – with a single black American Organization nor Non-Profit – **from here until eternity** – as long as the Bank “represents” that it has outreach – no matter how marginal - to a “minority census tract” that is **outside** of the black American Neighborhoods in Houston or in Dallas.

to continue to deny the **Equal charitable contributions** – in any amounts to make a material difference in the lives and communities of the protected class of black Americans – **from here until eternity** – as long as the Agencies stumble upon a charitable contribution in a “minority census tract” that is outside of the black American Neighborhoods in Houston or in Dallas

It is the correction, fixing and ending of the **Pretexts of Illegal Discrimination** that the named Banks - with the full “governmental support” of the Agencies – have been allowed to “represent” and to continue its practices, actions (and non-actions), policies of illegal discrimination, redlining, disparate impact and disproportionate discriminate effect – in Agency sanctioned violations of the banking laws – CRA, ECOA, FHA – to include the Final Rule, HMDA, Fair Lending Laws, FTC Act- Section 5, of the Civil Rights Laws – Title VIII – 1968 Civil Rights Act and of the Constitutional protections – Equal Protection Clause – 14th Amendment – US Constitution

-that can only be corrected fixed and ended by the robust investigative and enforcement actions of **the FDIC**– as the Banks have steadfastly refused and failed to

-faithfully execute its sworn duties and responsibilities pursuant to the banking laws in the laws’ entirety and in the laws full and final perfection

--the controlling authority of the **US Supreme Court** ruling in TDHCA V ICP, Inc. that established liability under the Fair Housing Act - for any lender or Bank practice or action that results in the disparate impact on members of a protected class – the class specifically referred to in the TDHCA case and in the RIG Complaints is the protected class of black Americans

--the controlling authority of the Federal District Court case of **US V Hudson City Savings Bank FSB** – that expanded the Bank liability under the ECOA to include Bank practices that deny the Equal access to capital, lending and banking services and that discourages the protected classes from applying for credit – specific example referenced is the Bank practice of placing its Bank branches **outside** of the black American Neighborhoods

-the controlling authority of the Federal District Court case of **US V Chevy Chase FSB** – that established and expanded liability under the ECOA, FHA – to include the Final Rule and under Title VIII - the 1968 Civil Rights Act -to include practices that avoid doing in the black American Neighborhoods, that denies the Equal opportunity to secure real estate related transactions, business lending – and practices that **deny the full enjoyment of Equal rights** secured under the banking laws to the protected class of black Americans

-the controlling authority of the HUD **Department** Complaint – **US V Midland States Bancorp, Inc.** that established and expanded Bank liability under the FHA – to include the Final Rule and under the ECOA for Bank practices that designated the assessment service in a discriminatory manner that excludes the black American Neighborhoods, locating the branches and banking services outside of the black American Neighborhoods and failing to Equally market real estate lending to the black American Neighborhoods resulting in a lack of market in the black American Communities in Houston (and in Dallas) The named Banks failure to penetrate the black American markets in and of itself is violation of the FHA and the Final Rule.

--**FHA Final Rule** – that established liability under the **Fair Housing Act** for any Bank practice, action, policy, procedure, rule that has the disparate impact on members of a protected class – to include the protected class of black Americans - and that shifted the burden of proof to the Banks named in the complaint to provide the legally sufficient justification to prove that the practices challenged in the complaint are necessary to achieve one or more of the Banks legitimate substantial nondiscriminatory interests – and that these interests – where legitimate – could not be achieved by another practice with a less discriminatory effect.

The FHA Final Rule is the controlling authority of the US Supreme Court case **TDHCA V ICP, INC.**

As the **FHA Final Rule** allows for no exceptions the Banks named in the RIG Complaint either meet the standards in the **FHA Final Rule** – to include the shift in burden of proof -or the Bank(s) does not. Where the Bank fails to meet his standard the Illegal Discrimination Claims **stands** – and is certified by Agency -----

The **Renaissance Indexes Group** – pursuant to Constitutional rights to petition for redress of legitimate grievances to correct, fix and end the continuing injustices caused directly by the practices of the above-named Banks –

petitions the **FDIC** – pursuant to its sworn duties - to aggressively execute the **New and Corrected Investigations** -in Houston against the named Banks under the Fair Housing Act – to include the Final Rule, under the Equal Credit Opportunity Act – Effects Test and Community Reinvestment Act and under the Home Mortgage Disclosure Act Title VIII – 1968 Civil Rights Act – against the defendants Banks.

In The Relentless Pursuit of Justice,

Barry Simmons

Renaissance Indexes Group - Chairman



(832) 655-1590

FDIC

ATTN: Art Khan /

Bank Complaints – Truist Bank

RE: Sophisticated Illegal Discrimination

August 17, 2022

The **Renaissance Indexes Group** (RIG, Complainant) outlines where the Banks named in the Complaints are engaged in the historical, systemic, pervasive and continuing practices, policies, patterns, actions (and non-actions) that have the disparate impact and the disproportionate discriminate effect on the individuals, businesses, households and Neighborhoods in the specified majority black American Zip Codes in Houston (and in Dallas) – and result in continuing illegal discrimination perpetrated against the protected class of black Americans.

The RIG outlines further where these practices and actions have taken on sophisticated forms that have seemingly left the Agencies behind – in the dust and groping in the dark, as it were - in what are supposed to be – pursuant to sworn duties - independent investigations in the relentless pursuit of justice.

--CRA Assessment Area – the Bank is duty bound to include the entire assessment area and to serve the entire the low income and underserved black American Neighborhoods in the Houston and Dallas MSA. However, in answer to questions from the Agencies based on Claim outlined by the Claimant the Banks claims that it is in compliance with the banking laws and has served the credit needs of the individuals, businesses and Neighborhoods within the Banks’ “assessment area”. What is conveniently left out of the equation is that the Bank has excluded the majority black American Neighborhoods – for the most part – from its assessment area – and predicated on this **exclusion** is not bound to serve the excluded Neighborhoods.

The truth of the matter is – this exclusion of the protected class of black Americans is in and of itself violation of the banking laws – to include the CRA. This sophisticated illegal discrimination was highlighted in the critical case of **US V Hudson City Savings Bank FSB (2015)**. That the Bank can get away with the exclusion of whole Neighborhoods – on a prohibited basis –while under the “continuing supervision” of the Federal Reserve raises disturbing questions of Agency Supervision and Enforcement duties.

Factoring - This is a business lending service that is important to the thriving of small businesses and the small businesses that receive this service stay in business and expand –whereas the small businesses denied this service may very well go out of business. The named Banks have chosen to deny this important service to the black

American Small Businesses in the Texas markets – and have failed to market this banking service to the black American businesses as well.

Discretionary Accommodations – The discretionary accommodations – banker counseling, waiver of credit marks, overrides, etc. - are critical to the full enjoyment of Equal rights and in a large number of cases makes all of the difference as to whether the consumer loans, lines of credit and other credit is approved – or is not approved. As the discretionary accommodations are all in house and in some cases have to be asked for by the customer the Bank fails to inform or to volunteer this service to the black American clients – and denies their loans under the claim that they did not qualify. The Bank has failed to advertise or to promote a single discretionary accommodation in a single black American Media outlet or to present the discretionary accommodation sat a single Neighborhood Group Events in the majority black American Neighborhoods in Houston (or in Dallas). Yet the same Bank makes this service routinely available for the Anglo customers – in all of the lending and credit categories – its denials to the contrary notwithstanding.

Bank Branches – While the RIG has stated in the Complaints the denial of Equal Bank branches in the majority black American Neighborhoods – the sophisticate illegal discrimination manifests in the Bank policy and practice to **favor** the Neighborhoods where it has placed its Bank branches – in lending – business, home mortgages, home equity, commercial lending and in construction loans,, bank financed developments, investments, Community Development Loans, advertising and in the larger charity contributions and Charity Gala Events for the Non-Profits that are in the Neighborhoods where the Bank just happen to build its Bank branches – and the Neighborhoods denied the Bank branches are denied all of the above. **US V Chevy Chase FSB**

Community Development Loans – While the Bank has shown a propensity to make Community Development Loans (CDL)'s in the black American Neighborhoods the CDL are much smaller and are for different purposes – purposes that do not revitalize or stabilize the Neighborhoods and that do not attract the additional investments that e Neighborhood needs to thrive. The Bank is more than willing to provide for the wider array of homeless services, rehab cesspools for the undesirables and for detox sewer holes for the degenerates – the Bank steadfastly refuses to make the CDL's for the gleaming glass and steel **Hi Tech Centers** – to train coders and programmers, **Apprenticeship Facilities** to train machinists and electricians and the **Neighborhood Centers** that facilitate the beautification and public safety that attracts the investments to the Neighborhoods. Yet the same Bank makes these kinds of CDL's outside of the majority black American Neighborhoods in Houston (and in Dallas).

Informational Services The Bank limits the informational services to include the direct mailings and pre-approved credit cards to the households where it happens to have

placed its Bank branches and denies these same services to the Neighborhoods where it has not built its Bank branches – which just happen to be the majority black American Neighborhoods. The Bank denies this service to the protected class of black Americans – under the guise of “Neighborhood Informational Services”.

LENDING – As this is the largest and most important banking category – this is where the sophisticated illegal discrimination is **most egregious** – and this where the named Banks are most creative in the denial of Equal Lending.

The black American individuals, businesses, households and Neighborhoods – both inside the specified Zip Codes and outside are denied the Equal marketing of the Banks’ lending and credit products , are denied the **Discretionary Accommodations** – banker counseling, waiver of credit marks, overrides, waiver of Fees, deferments on repayments, examinations of nontraditional credit – rental payments, utilities payments and storage Fees payments – to get their loan applications approved – in the same way that the same Bank freely extends the Discretionary Accommodations to the Anglo Applicants and to others.

The black American businesses are denied the working capital loans, are denied the bridge loans and are denied the factoring that the Banks freely extend to others that are similarly situated.

The protected class of black Americans is shut out altogether in the Bank financing of the **Wealth Creating Entities** lending – Stock Brokerage Houses, Trading Companies, Private Equity Groups and Real Estate Investment Trusts – not to mention the Banks’ Wealth Management Services.

The grudging pittances that the Bank does approve for the protected class of black Americans come saddled with the following encumbrances: higher interest rates, demands of larger collateral for the loan, on different terms, denial of deferments.

While the Bank is willing to lend the black American consumers \$50,000.00 to buy an expensive vehicle the same Bank refuses to lend the same person the same \$50,000.00 to go into business or to buy a house or for a home equity loan -

The few mortgages extended to the protected class of black Americans are smaller in amount and come with higher interest rates and with fewer options – are denied the same Services-- Skip Payments Privileges, Growing Equity Mortgages, Growing Payment Mortgages, etc. – as extended to the Anglo home buyers.

Bank Financed Developments – The majority black American Neighborhoods are denied the Equal Bank financed developments – stores, hotels, restaurants, supermarkets, apartment complexes, office towers – that the Bank reserves for the second set of Zip Codes in Houston and in Dallas. The Bank financed developments are little more than plywood prefab apartments, donut shops and pawn shops – these

pathetic “developments” hardly attract the same Bank investments that are made in the second sets of Zip Codes in Houston and in Dallas.

Community Outreach the Bank has limited the community outreach in the majority black American Neighborhoods to opening checking accounts. The named Banks have failed to establish a single capitalized **CRA Partnership** or a single capitalized **Neighborhood Group Alliance** and have failed to promote a single **Home Ownership Seminar** in a single black American Neighborhood in Houston.

Charitable Contributions --- The named Banks will limit the charitable contributions to the church donations, homeless shelters and detox sewer holes – but deny the full Capital Campaigns, deny the underwriting of Capital Charity Galas - \$100,000 Wine and Lobster Affairs at top Hotels and deny the full College Scholarships for black American students – for any of the Non-Profits and organizations in Houston or in Dallas.

Advertising / Marketing -- The named Banks have failed to Equally market the lending and credit products to the majority black American Neighborhoods – and have yet to deliver the **full annual advertising contracts** to a single black American Media Outlet. The few advertisements made do not present the promotions of lending and credit products- are smaller in size, less in frequency and smaller dollar amounts.

Underwriting Policies In the continuing sophisticated forms of illegal discrimination the Bank named in the Complaint denies the Illegal Discrimination Claims in Equal lending – and argues that the lending process is in accordance with the Banks’ underwriting guidelines. This does not correct the injustice of denial of Equal lending and does not increase lending to the underserved individuals, businesses, households in the majority black American Neighborhoods in Houston (or in Dallas). The underwriting policies are all “in-house” and are not subject to any objective scrutiny to ensure the loan applications from the black American applicants receive the exact same review and all of the discretionary accommodations that Anglo applicants receive.

Policies, Procedures and Practices the Banks named in the Complaints hide behind this familiar refrain in the Illegal Discrimination Claims that outline the stark and glaring disparities in the numbers, sizes and geographical dollar amounts in all of the banking and lending and categories. The Banks claim that it has policies, procedures and practices in place to prevent illegal discrimination. This does not correct, fix and end the systemic, pervasive and continuing

denial of the full enjoyment of Equal rights secured under the CRA, ECOA, HMDA, FHA – to include the Final Rule, Title VIII – 1968 Civil Rights Act and under the Equal Protection Clause – 14th Amendment – US Constitution to the protected class of black Americans in the second set of Zip Codes in Houston and in Dallas.

Indeed, every single Bank has made this claim – to include the Banks caught in the **“Color of Money”** scandal – Atlanta Constitution Newspaper series - which uncovered

the most egregious kinds of practices of illegal discrimination and redlining perpetrated against the protected class of black Americans. The latest scandal of this sort was discovered in undercover investigation in the 2015 **FHJC V M&T Bank** case – where black Americans were discriminated against in every banking category – especially in-home mortgages and in business lending.

It is the uncovering and correction of these kinds of **Sophisticated Illegal Discrimination** perpetrated daily by the Banks named in the Complaints that the Agencies have failed the RIG –

-and that can only have corrected, ended and fixed by the aggressive and potent enforcement actions by the FDIC

In The Relentless Pursuit of Justice

Barry Simmons

Chairman / Renaissance Indexes Group



(832) 655-1590



Town of Columbia

"A Heart's Delight" founded in 1793

103 Main Street • P.O. Box 361
Columbia, NC 27925
252.796.2781(P) • 252.796.0082(F)

December 5, 2022

Mr. William H. Rodgers Jr., Chairman and CEO
Truist Financial Corporation
214 N. Tryon Street
Charlotte, North Carolina 28202

Dear Mr. Rodgers:

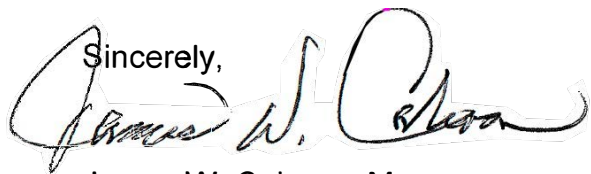
I am writing this letter based on some recent information I received about Truist Bank Closing in Columbia, N.C. I am concerned that our small rural town (population 848), in just a few months, will possibly be without a bank within our town or in the county. Two years ago, we had two banks and a credit union in our town. In 2021, First National Bank closed its doors. That closing left us with only Truist Bank to serve our town and county. Many of us made arrangements to switch our accounts to Truist in order to support our local bank and have local access to financial services. Now we are told that Truist Bank has plans to leave us. This places our businesses, organizations, and residents in a situation where the nearest bank would be at least 35 miles away. We do have a credit union, but businesses, institutions and organizations as well as many of our residents are excluded from utilizing their services based on current laws, rules and regulations.

I believe it has been at least 100 years since our town and county have been without a local bank. I am concerned about what effect this may have on our local businesses and how it may affect other businesses that might be discouraged from locating here in a town without a local bank. I am concerned about the elderly who may now have to travel 70 miles round-trip to do their banking as well as other citizens unable to access the credit union. It also presents banking roadblocks, complications and challenges to our local businesses and organizations, particularly when it comes to cash deposits.

Unfortunately, almost every decision made in our day and time seems to be dependent on the decided, acceptable profit margin without any consideration as to how it negatively impacts the customer and the local citizenry. The decision to close the Truist Bank here in Columbia, N.C. is a real blow to a rural community already struggling to stay financially viable. Please know that we have always been a determined and resilient community, but these kind of decisions really place us in a very difficult and disadvantaged position.

On behalf of our town and our citizens, I am appealing to you to reconsider the decision to close the Columbia Branch of Truist Bank. I don't have any idea what criteria you have considered in making this decision, but my hope is that we could work together to keep our local bank open! Thank you for your time and consideration in this very important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Cahoon", written over a light blue circular stamp.

James W. Cahoon, Mayor
Town of Columbia, N.C.

cc: Chris Isley, Regional President
Eastern N.C. Division, Truist Financial Corporation
200 Pine Street
Wilson, North Carolina 27893

Dale Folwell, Chairman
N.C. State Banking Commission
4309 Mail Service Center
Raleigh, North Carolina 27699



Client Advocacy
P.O. Box 85024
Richmond, VA 23285-5024
Tel 844-4TRUIST

Susan Mitroka
Banking Officer
Client Resolution Senior Specialist

January 9, 2023

James W. Cahoon, Mayor
Town of Columbia, NC
P.O. Box 361
Columbia, NC 27925

RE: Branch Closing
Case 12/13/2022-7199234

Dear Mr. Cahoon:

Thanks for sharing your concerns about the plans to close our Columbia branch.

We hear you. And we recognize how unsettling it can be when changes occur to something as familiar as your community bank.

Change is almost never easy. But we're always looking for better ways to deliver our services—including branches and ATMs—to make sure we're meeting our clients' changing needs.

So, know that the decision to close the Columbia branch wasn't taken lightly and was made only after careful study and analysis. Once a decision like this is made, our next priority is to continue to provide our clients with caring client service.

We hope to continue to serve our clients financial needs at the Edenton branch located at 108 Claire Drive in Edenton, NC 27932 or any other convenient Truist location. And now there are more ways than ever to bank with us.

Digital banking – You don't need a branch—or even a computer—to do your banking. Learn more at truist.com/digital-banking.

ATM – Get cash, make a deposit, or check account balances at any of our convenient locations. Find an ATM or branch at truist.com/locations.

Phone – No smart phone? No problem. If you can text, you can bank. Details at truist.com/digital-banking.

Again, please know that we take this process very seriously and have reviewed every option before making the decision. We appreciate the opportunity to respond to your concerns and thank you for sharing your concerns with us.

Sincerely,



Susan Mitroka

Banking Officer

Client Resolution Senior Specialist / Truist

Client Advocacy

PH: 727-939-3915

**FDIC****Federal Deposit Insurance Corporation**

Division of Depositor and Consumer Protection

10 10th Street, NE, Suite 800

Atlanta, Georgia 30309-3849

Atlanta Regional Office

678-916-2200

March 21, 2023

[REDACTED]
[REDACTED]
[REDACTED]

Subject: Truist Bank
 Closure of the Polk City Branch Office located at
 212 North Commonwealth Avenue, Polk City, Polk County, Florida

Dear [REDACTED]:

Thank you for your letter indicating your concern about the subject. We appreciate and understand your comments in relation to the closure of the branch and the inconvenience that the closure of the Polk City Branch location will cause. We provide the following information.

The FDIC is not empowered to prohibit the bank from closing the Polk City Branch Office. During the process of informing the FDIC of the proposed office closure, bank management provided valid and justifiable reasons for their decision. Truist Bank offers alternative banking services, including online banking, bill pay, mobile banking, and toll-free 24-hour automated telephone-banking center that may help lessen any inconvenience related to the closing. The online banking services are accessible 24-hours a day, allowing customers to check account balances, transfer money between accounts, make loan payments, and pay bills. We would also provide that there are multiple other banking options located within 12 miles, including Truist Bank Branch Offices, that may be alternatives to provide you with the services you may require.

On March 16, 2023, Review Examiner Tina Brison spoke with a representative of Truist Bank to inform them of your concerns. Bank management was encouraged to communicate with you about banking options and alternative services. We apologize that we could not be of further assistance to you.

Sincerely,
Sherri W. Brown
Assistant Regional Director

*When? 01/10/2023

*Resolve: How Phone

Resolve: Contact
Name

Resolve: Title

Have you filed a complaint or contacted another government agency?

No

*Gov Agency:
Agency Name

***Please describe below the nature of your inquiry or concern.**

To Whom It May Concern, On behalf of the businesses and residents of Polk City, Florida, I wish to draw your attention to TRUISTBANK's intention of closing down its local branch here in Polk City, Florida. Polk City, Florida has had a bank in this small town for the past decades. BB & T was the last bank until it was bought over by TRUIST Bank a couple of years ago. After Truist Bank acquired BB & T, Truist has decided to close its branch here in Polk City, Florida. We the businesses and the citizens have made our objection to the bank closure but Truist is bent on closing it down in a couple of weeks. I called the Federal Reserve Bank for assistance and was told FDIC rather has jurisdiction or control over Truist Bank. We are opposed to our local hometown bank from closing down for the following reasons:

1. Job Opportunities: Closure of the bank will impact the jobs of the bank employees who may not be able to transfer to a new location due to distance and lack of job availability at other banks.
2. Economic Support: By keeping your money local, your community bank can distribute more loans to people and businesses in your area thus increasing the economic base of the community. Local banking affords the convenience for every-day transactions and access to loans to support personal or business developments.
3. Decisions with Community in Mind: Local banks have an intimate knowledge of the local economy, citizens, and market conditions. A local bank can bridge connections to support the growth of small business owners and non-profit institutions.
4. Convenience: Local banking affords the convenience of saving time instead of traveling a distance to take care of everyday banking needs. I hope if the Federal Community Reinvestment Act is applicable in our situation, then could you help us from having our only bank in a twenty Five miles radius from closing down. Your utmost attention to his humble request will be very much appreciated. Thank you. Sincerely,

Please be advised that the FDIC may contact your financial institution or company to obtain additional information needed to respond to your inquiry or concern.

***Desired Resolution**

What action by the financial institution or company would resolve this matter to your satisfaction?
IN SUPPORT OF THE FEDERAL GOVERNMENT COMMUNITY REINVESTMENT ACT, WE THE BUSINESSES AND CITIZENS OF POLK CITY, FLORIDA WOULD LIKE THE FDIC TO STOP TRUIST BANK FROM CLOSING DOWN IN A COUPLE OF WEEKS. CLOSING DOWN THE ONLY BANK IN A TWENTY FIVE MILES RADIUS WILL BRING HARDSHIPS TO OUR ORANGE GROVE FARMERS, CATTLE RANCHERS, BUSINESSES AND THE ORDINARY CITIZENS OF THIS RURAL COMMUNITY. WITH THE HIGH GAS PRICES AND INFLATION, THE ECONOMIC BURDEN ON THE CITIZENS OF THIS TOWN WILL BE UNBEARABLE ESPECIALLY WHEN WE HAVE TO DRIVE 25 MINUTES TO THE NEAREST TOWN. POLK CITY DOES NOT HAVE A TRANSIT OF PUBLIC TRANSPORTATION SO THE PRESENCE OF A LOCAL BANK WAS A TREMENDOUS HELP TO THE INDIGENT AND YOUNG PEOPLE WHO COULD WALK TO THE BANK FOR THEIR MONETARY TRANSACTIONS. WE HOPE YOU WILL ACT EXPEDITIOUSLY TO STOP TRUIST BANK FROM CLOSING DOWN. THANK YOU.

☒ *Checking this box authorizes the FDIC to respond to your inquiry



Client Advocacy
P.O. Box 85024
Richmond, VA 23285-5024
Tel 844-4TRUIST

Nicole Norris
Client Resolution Senior Specialist

April 11, 2023



Subject: Polk City Branch Closing
Federal Deposit Insurance Corporation (FDIC)

Dear [REDACTED]:

Thank you for your recent letter to the FDIC concerning our plans to close the Polk City Branch. We understand your concerns regarding this situation and recognize any business closing can be an emotional issue for a community.

Please know that at Truist we do not take the decision to close a branch lightly. We have implemented a process whereby we continually review and evaluate the viability, convenience and physical conditions, among other factors, of our branches. We do this to ensure all of our branches meet our clients' needs, provide a leading role in the community and maintain responsibility to our shareholders.

One of our foremost concerns is the effect that a branch closing has on the local community. We realize that a bank can serve as a financial center and a community cornerstone. As such, we are very sensitive to the inconvenience and impact on this action, and it is only after extensive analysis we make the difficult decision to close a branch.

Truist has reviewed the business strength of our branch in Polk City. Based on many factors, including client usage patterns, the decision was made to close the branch and consolidate it with our branch located at 212 N. Commonwealth Ave., Polk City, FL 33868.

Based upon our analysis of population and geographic information regarding the location of the Polk City Branch, Truist's Fair Lending Department feels the lending and service needs of the community can still be serviced adequately. Truist's presence in Polk County, consists of 14 branches and 26 ATMs. After the closing, 13 branches and 25 ATMs will remain in the county. In addition to the physical facilities the bank offers, Truist's clients have free access to our Truist Care Center (formerly Phone 24) and Truist Digital Banking. Also, our smartphone clients are able to access their accounts, initiate transfers, pay bills and deposit checks via their mobile device. Finally, the Polk County community has access to 68 other financial institutions within its borders, ensuring all members of the Polk Country community have access to traditional banking solutions. Closing this branch will have a minimal impact on Truist's clients, the surrounding community and our ability to comply with the CRA requirements.

██████████
April 11, 2023

Page 2

Truist has 33 branch locations and 58 ATMs within 30 miles of the Polk City Branch. The drive times range from approximately 13.4 minutes to 55.8 minutes. Enclosed please find a map which graphically displays the Truist branches in the area (sourced through Truist.com). Also, Truist is available everywhere, be it online at Truist.com or via the Truist Digital Banking App and by telephone at 1-844-4TRUIST.

██████████, again, please know that we take this process very seriously and reviewed every option before making the difficult decision to close the Polk City Branch. If you have any questions, please call us at 863-984-0287. We will be glad to speak with you.

Sincerely,

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

Nicole Norris
Client Resolution Senior Specialist
Consumer Regulatory & Executive Services Team

Enclosures



Client Advocacy
P.O. Box 85024
Richmond, VA 23285-5024
Tel 844-4TRUIST

Sarah Dial
Client Resolution Specialist

January 18, 2024



Terre Hill, PA 17581

Re: Branch Closing
Case 01/16/2024-8742411

Dear [REDACTED]:

Thanks for sharing your concerns about the closing of our Terre Hill - PA branch.

We hear you. And we recognize how unsettling it can be when changes occur to something as familiar as your community bank.

Change is almost never easy. But we're always looking for better ways to deliver our services—including branches and ATMs—to make sure we're meeting our clients' changing needs.


So, know that the decision to close the Terre Hill - PA branch wasn't taken lightly and was made only after careful study and analysis. Once a decision like this is made, our next priority is to continue to provide you with caring client service.

We hope to continue to serve your financial needs at the Blue Ball – PA branch or any other convenient Truist location. And now there are more ways than ever to bank with us.

Digital banking – You don't need a branch—or even a computer—to do your banking. Learn more at truist.com/digital-banking.

ATM – Get cash, make a deposit, or check account balances at any of our convenient locations. Find an ATM or branch at truist.com/locations.

Phone – No smart phone? No problem. If you can text, you can bank. Details at truist.com/digital-banking.


January 17, 2024

Page 2

Again, please know that we take this process very seriously and have reviewed every option before making the decision. We appreciate the opportunity to respond to your concerns and thank you for choosing to bank with Truist.

Sincerely,

Sarah Dial

Sarah Dial
Client Resolution Specialist
Client Advocacy

William Rogers, CEO
Truist Bank Headquarters
214 North Tryon Street
Charlotte, NC 28202

[REDACTED]
[REDACTED]
Terre Hill, PA 17581
January 20, 2024

Dear Mr. Rogers,

Included in this packet is the original letter I sent to your organization on Dec. 28, 2023. Your organization did not even have the decency to respond to my letter. How unprofessional is that?

We are shocked by this heartless decision to close our local bank—one of the busiest and most thriving in our area. We also are deeply bothered that the employees at this bank who have served your organization with the utmost excellence and dedication are all losing their jobs. There was an article in our local newspaper on January 19 about your decision to close our bank. I was amazed by the 80 plus on-line comments about this article—which certainly verifies my original comments of this branch being one of the busiest in the county; how the employees of this bank were outstanding and how this drew people to the bank. Nothing was said in the newspaper article about how you abandoned your employees—but it should have been said! This is yet another example of a heartless beaucratic system that does not care about their employees or the people they serve.

I do understand that there is a need for a corporation to make a profit-- but why close one of your best-run banks? This makes absolutely no sense. Just because our community is small, does not mean that you were not able to make a profit. Indeed, the reputation of Truist Bank has now become quite tarnished in our area.

Sincerely,

[REDACTED]

Truist Bank Headquarters
214 North Tryon Street
Charlotte, NC 28202

(Original letter I sent,
which received no
response)

[REDACTED]
[REDACTED]
Terre Hill, PA 17581

December 28, 2023

Dear Officials of the Truist Bank:

I am writing to you to express my deepest frustration of your decision to close our beloved Terre Hill bank. What idiot in your organization made such a horrible decision? Did anyone talk to the local people who live and work in this area? If they did, they would find OVERWHELMING support of our local bank. So far, everyone I have heard speak about this issue expressed a deep sadness about this decision. There has been a bank branch in Terre Hill since at least 1954, which is almost 70 years. When your bank company took over the BB & T Bank, I believe you made a promise to us that you would still provide us with excellent service. Why have you broken that promise?

Admittedly, Terre Hill is a small community, but the bank you intend to close is a central hub for our community. Our bank is probably busier than all the other banks in neighboring towns. I have heard several people express that they preferred to come to our local bank because the tellers are friendly and extremely efficient. As customers, we were not just a number, and the tellers all made an effort to know our names, which is incredible in this day and age! In addition to that, many of the customers who come to the bank are Amish or Old Order Mennonites who do not drive cars. Closing this branch would be a serious hardship for them. They do not want to drive to another branch as the traffic is heavy and traveling via horse and buggy or bike would expose them to dangerous, even life-threatening conditions.

My family and I have lived in Terre Hill for over 35 years. The Terre Hill Bank helped us with our mortgage. We had our savings in your bank and have had several CD's and Money Market accounts through the years. We presently have a CD, a Safe Deposit Box, and our checking account. We also opened up savings accounts for all of our four children when they were young.

I am a [REDACTED] and I feel it is my duty to represent our citizens faithfully. Please, I beg you, DO NOT CLOSE OUR BELOVED BANK! It would be detrimental to our local community.

For those of us who have safe deposit boxes, your offer of a free one-year box because of the "inconvenience" is pityful and an insult.

I feel betrayed by this action of closing our bank. If I have to transfer accounts to a different bank, I certainly will not transfer my funds to another Truist Bank, and will also encourage all my neighbors and friends to do the same.

I am sorry if this letter sounds so harsh, but I feel this decision you have made is terrible and will not only hurt our community, but also tarnish your reputation and hurt your business. Please reconsider.

Sincerely,

A solid black rectangular box used to redact the signature of the sender.

Terre Hill, Pennsylvania

Horchler, Scott

From: Oparnica, Misty
Sent: Wednesday, January 10, 2024 2:46 PM
To: [REDACTED]
Subject: Truist Response [REDACTED]

[REDACTED]

Re: Branch Closure
Case 01/02/2024-8666835

Dear [REDACTED]:

Thanks for sharing your concerns about the plans to close our Yemassee South Carolina branch.

We hear you. And we recognize how unsettling it can be when changes occur to something as familiar as your community bank.

Change is almost never easy. But we're always looking for better ways to deliver our services—including branches and ATMs—to make sure we're meeting our clients' changing needs.

So, know that the decision to close the Yemassee branch wasn't taken lightly and was made only after careful study and analysis. Once a decision like this is made, our next priority is to continue to provide you with caring client service.

We hope to continue to serve your financial needs at the Hampton South Carolina branch or any other convenient Truist location. And now there are more ways than ever to bank with us.

Digital banking – You don't need a branch—or even a computer—to do your banking. Learn more at truist.com/digital-banking.

ATM – Get cash, make a deposit, or check account balances at any of our convenient locations. Find an ATM or branch at truist.com/locations.

Phone – No smart phone? No problem. If you can text, you can bank. Details at truist.com/digital-banking.

Again, please know that we take this process very seriously and have reviewed every option before making the decision. We appreciate the opportunity to respond to your concerns and thank you for choosing to bank with Truist.

Sincerely,

Misty Oparnica
Assistant Vice President
Client Resolution Senior Specialist

Horchler, Scott

From: [REDACTED]
Sent: Friday, December 29, 2023 4:42 PM
To: [REDACTED]
Subject: Fw: Complaint-29945 Truist Closure

[REDACTED]

Sent with [Proton Mail](#) secure email.

----- Forwarded Message -----

From: [REDACTED]
Date: On Thursday, December 28th, 2023 at 8:50 PM
Subject: Complaint-29945 Truist Closure
To: publicaffairs3@occ.treas.gov <publicaffairs3@occ.treas.gov>

28 December 2023

Office of the Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

Subject: Concerns Regarding the Closure of Truist Bank Branch in Yemassee, SC

Dear Sir/Madam,

I am writing to express my deep concerns and to seek your intervention regarding the impending closure of the Truist Bank branch located in Yemassee, SC, Hampton County, scheduled for March 2024. This decision poses a significant threat to our community's well-being, especially considering the lack of banking services within a 40-mile radius.

The closure of this branch will disproportionately affect our local businesses and residents, many of whom rely on the convenience and accessibility of a nearby banking institution. The absence of a bank within a reasonable distance compels our community members to either utilize costly alternatives such as check-cashing services at local stores and expensive ATM machines or to undertake a time-consuming and burdensome journey to access banking services.

Furthermore, I believe that the decision to close this branch is not solely based on the purported lack of foot traffic. The operating hours of the bank, restricted to 9 AM to 2 PM, have been a significant impediment for many working individuals who find it challenging to visit the bank during these hours. This limitation seems to contravene the spirit of the Community Reinvestment Act (CRA), which aims to ensure that financial institutions meet the needs of all segments of their communities, including low- and moderate-income neighborhoods.

I am concerned that this closure could be seen as a deliberate strategy to disenfranchise a segment of the population that is already underserved by the banking sector. It appears to be an engineered closure aimed at withdrawing banking services from a community that most needs them.

In light of these concerns, I respectfully request that your office thoroughly review this decision under the provisions of the Community Reinvestment Act. It is imperative that Truist Bank be held accountable to its obligations under the CRA, ensuring that its actions do not unjustly harm the community it is supposed to serve. The people of Yemassee, SC, and the surrounding areas deserve a banking partner that acts as a true neighbor, committed to their financial well-being and accessibility to essential banking services.

Based upon the impact this closure will have on our community, I am seeking to have a full audit report on the bank's compliance in the local MSA with an examination of its HMDA compliance. A local community meeting is also requested as per Title 12, CFR, National Banking Act guidelines.

Thank you for your attention to this matter. I trust that your office will take the necessary steps to review this situation and advocate on behalf of our community.

Sincerely,

A solid black rectangular box used to redact the sender's signature.

Sent with [Proton Mail](#) secure email.

February 20, 2024

[REDACTED]
[REDACTED]
McConnellsburg, PA 17233

Re: Branch Closing
01/18/2024-8755617

Dear [REDACTED]:

I appreciate you reaching out to share your concerns regarding the pending closure of our McConnellsburg branch. Please know that the decision to close any branch is not taken lightly and is preceded by a thorough review.

Care is in our nature, and it's at the core of what we do at Truist. Once a decision like this is made, our next priority is to continue to provide our clients with caring client service. We are reviewing to determine what we can do to continue support this community.

Again, please know that we take this process very seriously and have reviewed every option before making the decision. Your comments are very important to us and were shared with our senior leaders.

We appreciate the opportunity to respond to your concerns and thank you for choosing to bank with Truist. Please reach out to me directly at [REDACTED] or [REDACTED] if you wish to discuss this further.

Sincerely,

Travis M. Rhodes
Executive Vice President
Regional President, Pennsylvania/New Jersey

[REDACTED]
McConnellsburg, PA 17233

1/7/24

Mr. William Rogers
Chairman and CEO
Truist Financial Corporation
214 N. Tyron Street
Charlotte, NC 28202

Dear Sir:

Nearly all my life I was a customer of the hometown bank that evolved into Truist Bank. When it was the First National Bank of McConnellsburg, the bank and its staff were deeply involved in the community...belonging to local organizations, participating in parades and festivals, donating to community causes. It was the heart of the community.

With each merger (or takeover as I see it), the bank lost more and more of its connection to the community. It became a shell of what it had once been. In the process people lost jobs, community organizations lost support, and the town lost its heart. All in the name of "bigger is better." I know this doesn't mean anything to the folks at headquarters, but the loss to the community was devastating. And this is happening all over the country as big banks assert their financial clout.

For our town the damage is done. However, I propose a gesture by you that at least will acknowledge the negative effect big banks have inflicted on our town by taking over and then leaving. I call it severance pay. I have enclosed a list of community organizations that will never again benefit from donations or human expertise with the bank gone. I propose that before you "bank" your savings by abandoning our community you make a significant donation to each of these entities.

We'll see if this letter gets any response. I expect not, but I feel better having written it.

Very Sincerely,
[REDACTED]

cc. B. Cummins, A. Weekly

**Just a few McConnellsburg Area
Organizations That Benefited from our
Community Banks over the years:**

Fulton County Historical Society
PO Box 115
McConnellsburg, PA 17233

McConnellsburg Lions Club
PO Box 21
McConnellsburg, PA 17233

Fulton County Food Basket
PO Box 512
McConnellsburg, PA 17233

Main Street McConnellsburg
% Kelly Sheeder
415 Fulton Drive
McConnellsburg, PA 17233

Fulton County Library
227 North First Street
McConnellsburg, PA 17233

Forbes Road Lions Club
5871 N. Hess Road
Waterfall, PA 16689

McConnellsburg Vol. Fire Company
112 East Maple Street
McConnellsburg, PA 17233

Needmore Vol. Fire Company
8328 Great Cove Road
Needmore, PA 17238

Hustontown Vol. Fire Company
PO Box 537
Hustontown, PA 17229

Love's Closet
216 North Second Street
McConnellsburg, PA 17233

Fulton County Arts Council
227 North first Street
McConnellsburg, PA 17233

Grease, Steam and Rust Association
POP Box 29
McConnellsburg, PA 17233

Fulton County Fair Association
PO Box 246
888 Lincoln Way East
McConnellsburg, PA 17233

I would be glad to answer any questions
about these organizations.



Client Advocacy
P.O. Box 85024
Richmond, VA 23285-5024
Tel 844-4TRUIST

Crystal Morris
Client Resolution Specialist

March 7, 2024



Terre Hill, PA 17581

Re: Branch Closing
Case 02/26/2024-8964559

Dear [REDACTED]:

We have received and reviewed your correspondence to Mr. William H. Rogers, Jr., regarding the closing of our Terre Hill Branch.

We hear you. And we recognize how unsettling it can be when changes occur to something as familiar as your community bank.

Change is almost never easy. But we're always looking for better ways to deliver our services—including branches and ATMs—to make sure we're meeting our clients' changing needs.


So, know that the decision to close the Terre Hill Branch wasn't taken lightly and was made only after careful study and analysis. Once a decision like this is made, our next priority is to continue to provide you with caring client service.

We hope to continue to serve your financial needs at the Blue Ball Branch or any other convenient Truist location. And now there are more ways than ever to bank with us.

Digital banking – You don't need a branch—or even a computer—to do your banking. Learn more at truist.com/digital-banking.

ATM – Get cash, make a deposit, or check account balances at any of our convenient locations. Find an ATM or branch at truist.com/locations.

Phone – No smart phone? No problem. If you can text, you can bank. Details at truist.com/digital-banking.




March 7, 2024
Page 2

Again, please know that we take this process very seriously and have reviewed every option before making the decision. We appreciate the opportunity to respond to your concerns and thank you for choosing to bank with Truist.

Sincerely,

Crystal Morris

Crystal Morris
Client Resolution Specialist
Consumer Regulatory & Executive Services Team

 2-19-2024


Mr. William Rogers,
Greetings from Terre Hill, PA!

your Recent announcement to CLOSE Trust
bank in our town was a shock + sadness.
Seems so unnecessary, We've lived beside
this bank 50 years.

We find it quite unkind our area
was not "in on" the boards "going on".

We hope in your life time all
goes real smooth + non upsetting.

Peace + Joy, Thank You,


Terre Hill, PA.

17581

Message

Details



From: [REDACTED]

To: [REDACTED] [REDACTED] 

8:12 AM | May 17

Data Risk Classification: [-Internal-]

CIF [REDACTED] 7119

From: [REDACTED]

Sent: Friday, May 17, 2024 6:45 AM

To: [REDACTED]


Subject: Bank closeed I live in a small rural area. And the banks cloese to me have been closed.

I dont understand why you had to close these bank. There are elderly people in the community. That now have NO bank. Alot of them do drive long distance anymore. And to get to they bank they are 30 or more miles room them.

The bottom line is instead of looking at how much money the bank is making . Look at the people in the community that use this bank. And how you can help make things better for these people. I very disappointed over this. Hancock is trying to build the town back . Be part of the build back and bring our bank back. More business are coming our way. Which well help the town and your bank!!!

Thank you


The information transmitted is intended solely for the individual or entity to which it is



[REDACTED]

 [REDACTED]

[REDACTED]



[REDACTED]

 [REDACTED]



Client Advocacy
P.O. Box 85024
Richmond, VA 23285-5024
Tel 844-4TRUIST

[REDACTED]
Client Resolution Specialist

May 28, 2024

[REDACTED]

Re: Branch Closing
Case 05/17/2024-9499114

Dear [REDACTED]:

Thanks for sharing your concerns about the closing of our Hancock, MD branch.

We hear you. And we recognize how unsettling it can be when changes occur to something as familiar as your community bank.

Change is almost never easy. But we're always looking for better ways to deliver our services—including branches and ATMs—to make sure we're meeting our clients' changing needs.

So, know that the decision to close the Hancock, MD branch wasn't taken lightly and was made only after careful study and analysis. Once a decision like this is made, our next priority is to continue to provide you with caring client service.

We hope to continue to serve your financial needs at the Berkeley Springs, WV branch or any other convenient Truist location. And now there are more ways than ever to bank with us.

Digital banking – You don't need a branch—or even a computer—to do your banking. Learn more at truist.com/digital-banking.

ATM – Get cash, make a deposit, or check account balances at any of our convenient locations. Find an ATM or branch at truist.com/locations.

Phone – No smart phone? No problem. If you can text, you can bank. Details at truist.com/digital-banking.

[REDACTED]
May 20, 2024
Page 2

Again, please know that we take this process very seriously and have reviewed every option before making the decision. We appreciate the opportunity to respond to your concerns and thank you for choosing to bank with Truist.

Sincerely,

[REDACTED]

[REDACTED]

Client Resolution Specialist
Client Advocacy