
From: [REDACTED]

Sent: Friday, February 23, 2024 6:14 PM

To: [REDACTED]

Subject: Request for Full Copy of, & Timely Comments On, Requesting Hearings & an Extension of the Comment Period On the Applications by FirstSun Capital Bancorp, Denver, Colorado; to merge with Homestreet, Inc., and thereby indirectly acquire Homestreet Bank, ...

NONCONFIDENTIAL // EXTERNAL

February 23, 2024

Via E-mail to Office-of-the-Secretary [at] [frb.gov](https://www.frb.gov)

Board of Governors of the Federal Reserve System

Attn: [REDACTED]

20th Street and Constitution Avenue, N.W.

Washington, DC 20551

Re: Request for Full Copy of, & Timely Comments On, Requesting Hearings & an Extension of the Comment Period On the Applications by FirstSun Capital Bancorp, Denver, Colorado; to merge with Homestreet, Inc., and thereby indirectly acquire Homestreet Bank, both of Seattle, Washington

Dear [REDACTED] and others in the FRS:

This is a request for a full copy of, and a timely first comment on, the Applications of FirstSun Capital Bancorp, Denver, CO (& Dallas TX) to merge with Homestreet, Inc. and Homestreet Bank, Seattle, Washington.

FirstSun's flagship Sunflower Bank, in Texas in 2022, made 694 mortgage loans to whites, and only 41 to African Americans. Meanwhile it denied 12 applications from African Americans, and only 34 from whites.

This is disparate, and more disparate both than the aggregate in Texas.

Nationwide in 2022, Sunflower Bank made 3059 mortgage loans to whites, and only 194 to African Americans. Meanwhile it denied 49 applications from African Americans, and only 259 from whites.

For the record, on managerial resources and otherwise, note that on

September 27, 2023, FirstSun Capital Bancorp, the parent company of Sunflower Bank, Guardian Mortgage and First National 1870 (collectively, "Sunflower"), filed a notice of data breach with the Attorney General of California... an unauthorized party likely took advantage of the flaw in the MOVEit software and downloaded copies of files [containing] personally identifiable information."

HomeStreet, meanwhile, is politely said to have had a "tough" 2023.

[REDACTED] is requesting an extension of the public comment period, public / virtual evidentiary hearings and that, on the current record, the applications not be approved

[REDACTED] have been deeply concerned about the rush by the Federal Reserve to rubber-stamp mergers by redliners, money launderers and predatory lenders. This has been killing the Community Reinvestment Act and we timely request public hearings.

The comment period should be extended; evidentiary hearings should be held; and on the current record, the application should not be approved.

Please immediately send all requested information -- including a complete copy of the application, during the comment period -- and responses by e-mail to [REDACTED] and [REDACTED] -- and if also by regular mail, to [REDACTED]

[REDACTED] Please also confirm receipt of this formal submission. If you have any questions, please immediately telephone the undersigned, at [REDACTED].

Very Truly Yours,

[REDACTED]