



102242014003214



## SECURITIES AND EXCHANGE COMMISSION

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Company Information

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Industry Classification  
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Document Information

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**SECURITIES AND EXCHANGE COMMISSION**

Markets and Securities Regulation Department  
SEC Building, EDSA, Greenhills  
Mandaluyong City

Attn: **Director VICENTE GRACIANO P. FELIZMENIO, Jr.**

Re: **SUNTRUST HOME DEVELOPERS, INC.**

Gentlemen:

On behalf of our client Suntrust Home Developers, Inc. (the "Company"), we reply to this Honorable Commission's letter dated February 11, 2014, received on 17 February 2014, wherein the Company was directed to show cause within 5 business days why it should not be held liable for failure to hold its annual stockholders meeting in 2013.

The Company most respectfully seeks the consideration of this Honorable Commission for its failure to hold the annual stockholders meeting in 2013. The Company was and is still completing the requirements for its planned pre-emptive rights offering and increase in authorized capital as disclosed last 14 August 2013, which will require the approval of its stockholders, hence the Company could not proceed with its annual meeting last year.

Given the foregoing, on behalf of the Company, we respectfully appeal to this Honorable Commission not to impose any penalty considering that the non-holding of annual stockholders' meeting last year was for legitimate business reasons.

Thank you.

Very truly yours,



Dominic V. Isberto  
*Legal Counsel*