



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

June 28, 2019

Judy Gavant  
Executive Vice President and Chief Financial Officer  
BAY BANKS OF VIRGINIA INC  
1801 Bayberry Court, Suite 101  
Richmond, Virginia 23226

**Re: BAY BANKS OF VIRGINIA INC**  
**Form 10-K**  
**Filed March 8, 2019**  
**File No. 000-22955**

Dear Ms. Gavant:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Financial Services