



January 17<sup>th</sup>, 2024

**Mike Camoia**

Vice President- Tax Credit Investments Manager

BankUnited

14817 Oak Ln

Miami Lakes, FL 33016

Dear Mr. Camoia,

Thank you for your donation of \$██████████ to Great Rivers Community Trust dba Scale Link. Your investment is an important and powerful action that will help Community Development Financial Institutions (CDFIs) support small businesses – including those owned by Black, Indigenous, People of Color, and women-owned firms.

Scale Link has been designed to comply with official regulatory rules and guidance related to the Community Reinvestment Act (CRA). As a certified CDFI, the primary purpose of the fund is to promote economic development by investing in CDFIs. Funds invested provide critical support to CDFIs that generate small business and micro business loans.

Your donation meets the definition of qualified investment in the interagency CRA rule as well as the definition of a community development investment in the OCC's 2020 CRA rule. It has been ear-marked to a CDFI that serve(s) your assessment area. As such, it promotes economic development in your assessment area, which in turn provides positive CRA consideration. Please refer to the enclosed description that identifies the specific CDFI.

The interagency CRA rule defines qualified investment as a lawful investment, deposit, membership share, or grant that has as its primary purpose community development, including economic development. Likewise, the OCC's 2020 CRA Rule specifically includes investments in CDFIs as a qualified activity.<sup>1</sup>

In fact, official interagency guidance, in the form of Q&As states unequivocally: "The agencies will presume that any loan or service to or investment in a SBDC, SBIC, Rural Business Investment Company, New Markets Venture Capital Company, New Markets Tax Credit- eligible Community Development Entity, or Community Development Financial Institution that finances small businesses or small farms, promotes economic development."<sup>2</sup>

<sup>1</sup> CRA Rules: 12 CFR 25.12(t) and 12 CFR 25.04(c)

<sup>2</sup> CRA Guidance \_\_\_\_\_.12(g)(3)-2



We are excited to continue this ongoing relationship with BankUnited and look forward to helping advance your community impact in your assessment areas.

Sincerely,

*Brett Simmons*  
bcs SIGN 427Y98PK-187W9276

**Brett Simmons**  
Chief Executive Officer  
Scale Link  
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Zebulon, NC 27657