



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 \$[REDACTED] 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>

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<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*

boxSIGN 427Y9RFX-187W9P276

**Brett Simmons**  
Chief Executive Officer  
Scale Link  
33 S. Chesapeake Way  
Zebulon, NC 27657



May 1, 2024

**Mike Camoia**

Vice President – Tax Credit Investments Manager  
BankUnited, N.A.  
14817 Oak Lane  
Miami Lakes 33016

Dear Mr. Camoia,

Thank you for your May 1, 2024 purchase of participations in 16 small business loans in the amount of \$[REDACTED] from Great Rivers Community Trust dba Scale Link. Your purchase 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 through direct investments in CDFIs. It also purchases retail loan participations from certified CDFI partners. These actions provide critical liquidity to the CDFI. The Fund, in turn, provides an avenue for regulated financial institutions to garner positive CRA consideration under their lending and investment tests.

Your purchase of small business loan participations meets CRA requirements for retail lending test consideration. Small business loans are an important element of the review of a bank's lending test performance. The location of these loans within a bank's assessment area provides positive consideration, regardless of if they were directly originated by the bank or purchased. The interagency CRA Rule indicates that a bank's lending performance considers both originations and purchases of loans.<sup>1</sup> EBA Fund provided verified details of the gross annual revenue and location of the businesses on December 15<sup>th</sup>, 2023 and provides 24/7 access to the borrower files verifying this information at [ebafund.loanwell.com](http://ebafund.loanwell.com).

In addition, official interagency guidance, in the form of Q&As, states unequivocally: "Examiners will consider the amount of loan participations purchased when evaluating an institution's record of helping to meet the credit needs of its assessment area(s) through the origination or purchase of specified types of loans, regardless of examination type."<sup>2</sup>

The regulatory agencies have also provided guidance on reporting of small business loan participations purchased, for those banks subject to CRA loan data reporting, as well as how these volumes are assessed. Guidance states, "When collecting and reporting information on purchased small business and small farm loans, including loan participations, an institution collects and reports the amount of the loan at origination, not at the time of purchase. This is consistent with the Call Report's use of the 'original amount of the loan' to determine whether a loan should be reported as a 'loan to a small business' or a 'loan to a small farm' and in which loan size category a loan should be reported. When assessing

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<sup>1</sup> 12 CFR 25.22(a)(2)

<sup>2</sup> CRA Guidance \_\_.22(a)(2)-6



the volume of small business and small farm loan purchases for purposes of evaluating lending test performance under CRA, however, examiners will evaluate an institution's activity based on the amounts at purchase."<sup>3</sup>

Finally, the loans you purchased through Scale Link were made by a CDFI directly responding to the liquidity needs of underbanked small businesses in your assessment area. By taking on the risk of loss on these loans and providing liquidity back to the originating CDFI, the bank has made a direct and consequential impact.

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

Sincerely,

boxSIGN 4Z7YYRFX-17J68KQ6

**Brett Simmons**  
Chief Executive Officer  
Scale Link  
33 S. Chesapeake Way  
Zebulon, NC 27657

<sup>3</sup> CRA Guidance \_\_\_\_42(b)(2)-4



**40<sup>TH</sup>**  
ANNIVERSARY



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November 22, 2024

BankUnited, N.A.  
Tiffany Peralta - AVP, Community Development & Outreach Officer  
7825 NW 148th St  
Miami Lakes, FL 33016-1554

Dear Tiffany and Friends at BankUnited,

**House of Hope is so grateful for your year-end contribution of \$[REDACTED] received on 11/08/2024. This donation is the equivalent of 2,439 meals for the families we serve.** Your gift is especially helpful during the holiday season, when household finances and stresses tend to escalate.

House of Hope started 40 years ago when a handful of volunteers recognized a need and decided to hand out sandwiches in Martin County. Today, we are an organization with almost 50 staff and 900 volunteers working together to provide services that benefit 30,000 individuals across three counties. Thanks to valuable support like yours, our mission to empower residents to overcome hunger and hardship now includes access to food pantries and food bank services, clothes closets, financial assistance, comprehensive case management, workforce development, housing assistance, information and referrals, enrichment and nutrition education; always offered at no cost to those served.

Through generous collaborative efforts and contributions from our community, House of Hope makes critical resources accessible to those who need them most. Almost 1.2 million pounds of food including 500,000 pounds of fresh produce is distributed through 28,000 pantry services and 30 food bank partners annually. One-on-one coaching from our Workforce Coordinator and assistance from our Housing Coordinator is available to help clients find living wage employment and safe, affordable housing options in Martin County. Financial assistance is available to help low income clients avoid homelessness, with \$102,600 helping 187 households retain housing this past year.

Our production farm has 92,000 cubic feet of greenhouse hydroponic growing space and a 70 tree orchard that provide 1,500 packages of fruits, vegetables, leafy greens and herbs each week. Enrichment programs focused on improving the participant's health, literacy, self-esteem, and employability are now available at agency Centers in Stuart, Jensen Beach, and Indiantown; benefiting 878 individuals this past year through 5,923 services. Our nutrition education program improves each participant's 'Nutrition IQ' and reached 8,142 individuals this past year with our innovative Traveling Nutrition Education Garden that travels across the region.

We could not do this work without your support. **Thank you for spreading hope through our community!**

**I hope you and your loved ones have a happy, healthy Thanksgiving and holiday season this year.**

Sincerely,

Robert Ranieri  
Chief Executive Officer  
(772) 286-4673, ext. 1001  
rob@hohmartin.org

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# Center for Technology, Enterprise and Development, Inc.

December 31, 2024

Katrina Wright  
BankUnited  
78825 NW 148<sup>th</sup> Street  
Miami Lakes, FL 33016

Dear Katrina,

I hope this letter finds you well. I am writing to express my profound gratitude for the continuous support and contributions that BankUnited has provided over the years. Your unwavering commitment to our community and the numerous initiatives you have championed have made a significant impact on many lives, including my own.

Your generous contributions have facilitated various programs that have not only fostered economic growth but also enhanced the overall well-being of our community members. Whether through financial literacy workshops, community development projects, or supporting local businesses, BankUnited has consistently demonstrated a genuine commitment to making a positive difference.

As a beneficiary of your efforts, I have witnessed firsthand the transformative power of your contributions. It is heartening to know that organizations like BankUnited remain dedicated to uplifting and empowering communities. Your dedication inspires others to follow in your footsteps and work towards a brighter future for all.

Once again, thank you for your continued support and generosity. I look forward to seeing the continued positive impact that BankUnited will undoubtedly have in the years to come.

Warmest regards,



Seabron A. Smith, Executive Director  
Center for Technology, Enterprise and Development, Inc.

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