



March 18, 2025

To: [cora.alvi@treasury.gov](mailto:cora.alvi@treasury.gov), [alexandria.smith@treasury.gov](mailto:alexandria.smith@treasury.gov), [pravina.raghavan@treasury.gov](mailto:pravina.raghavan@treasury.gov),  
[Nicholas\\_Larsen@warner.senate.gov](mailto:Nicholas_Larsen@warner.senate.gov), [Connor\\_DiRusso@warner.senate.gov](mailto:Connor_DiRusso@warner.senate.gov), [Andrew\\_Gleaton@crapo.senate.gov](mailto:Andrew_Gleaton@crapo.senate.gov),  
[Thomas\\_Liepold@klobuchar.senate.gov](mailto:Thomas_Liepold@klobuchar.senate.gov), [Riley\\_OLeary@daines.senate.gov](mailto:Riley_OLeary@daines.senate.gov), [Caroline\\_Oakum@daines.senate.gov](mailto:Caroline_Oakum@daines.senate.gov),  
[Matthew\\_May@daines.senate.gov](mailto:Matthew_May@daines.senate.gov), [Samantha\\_lucas@ossoff.senate.gov](mailto:Samantha_lucas@ossoff.senate.gov), [Kanko\\_Zonou@ossoff.senate.gov](mailto:Kanko_Zonou@ossoff.senate.gov),  
[Hayes\\_Heredia@hydesmith.senate.gov](mailto:Hayes_Heredia@hydesmith.senate.gov), [Zachary\\_Baum@reed.senate.gov](mailto:Zachary_Baum@reed.senate.gov), [Zachary\\_Baum@reed.senate.gov](mailto:Zachary_Baum@reed.senate.gov),  
[Christopher\\_Land@lummis.senate.gov](mailto:Christopher_Land@lummis.senate.gov), [Omair\\_Taher@smith.senate.gov](mailto:Omair_Taher@smith.senate.gov), [Ben\\_Ellegn@smith.senate.gov](mailto:Ben_Ellegn@smith.senate.gov),  
[Seth\\_MacKinney@moran.senate.gov](mailto:Seth_MacKinney@moran.senate.gov), [Jack\\_Protzman@moran.senate.gov](mailto:Jack_Protzman@moran.senate.gov), [Cassandra\\_Brzezinski@vanhollen.senate.gov](mailto:Cassandra_Brzezinski@vanhollen.senate.gov),  
[Miguel\\_Torres@vanhollen.senate.gov](mailto:Miguel_Torres@vanhollen.senate.gov), [Kathleen\\_Gayle@rounds.senate.gov](mailto:Kathleen_Gayle@rounds.senate.gov), [Adam\\_Finkel@warnock.senate.gov](mailto:Adam_Finkel@warnock.senate.gov),  
[Sebastian\\_Paez@wicker.senate.gov](mailto:Sebastian_Paez@wicker.senate.gov), [Christopher\\_Sharer@peters.senate.gov](mailto:Christopher_Sharer@peters.senate.gov), [Isabelle\\_Zhan@peters.senate.gov](mailto:Isabelle_Zhan@peters.senate.gov),  
[Nick\\_Molling@cassidy.senate.gov](mailto:Nick_Molling@cassidy.senate.gov), [Ron\\_Anderson@cassidy.senate.gov](mailto:Ron_Anderson@cassidy.senate.gov), [Jeff\\_Schroeder@hickenlooper.senate.gov](mailto:Jeff_Schroeder@hickenlooper.senate.gov),  
[Nathan\\_Anonick@ag.senate.gov](mailto:Nathan_Anonick@ag.senate.gov), [Cary\\_Shelton@boozman.senate.gov](mailto:Cary_Shelton@boozman.senate.gov), [Kossi\\_Anyinefa@schatz.senate.gov](mailto:Kossi_Anyinefa@schatz.senate.gov),  
[Alex\\_Hanson@cotton.senate.gov](mailto:Alex_Hanson@cotton.senate.gov), [Madison\\_Moskowitz@wyden.senate.gov](mailto:Madison_Moskowitz@wyden.senate.gov), [Grace\\_Enda@finance.senate.gov](mailto:Grace_Enda@finance.senate.gov),  
[Josh\\_Dunn@kennedy.senate.gov](mailto:Josh_Dunn@kennedy.senate.gov), [Melissa\\_Sanchez@booker.senate.gov](mailto:Melissa_Sanchez@booker.senate.gov), [Grace\\_Kubitz@murkowski.senate.gov](mailto:Grace_Kubitz@murkowski.senate.gov),  
[Kaylee\\_Mulgrew@durbin.senate.gov](mailto:Kaylee_Mulgrew@durbin.senate.gov), [Andrew\\_Downing@sheehy.senate.gov](mailto:Andrew_Downing@sheehy.senate.gov), [Sophie\\_Boumsidia@bluntrochester.senate.gov](mailto:Sophie_Boumsidia@bluntrochester.senate.gov),  
[Eraj\\_Shirvani@justice.senate.gov](mailto:Eraj_Shirvani@justice.senate.gov)

CC: [Fatima.Abbas@treasury.gov](mailto:Fatima.Abbas@treasury.gov), [James.Colombe2@treasury.gov](mailto:James.Colombe2@treasury.gov), [clint.hastings@treasury.gov](mailto:clint.hastings@treasury.gov),  
[Amber\\_Ebarb@indian.senate.gov](mailto:Amber_Ebarb@indian.senate.gov), [Sarah\\_McKinnis@indian.senate.gov](mailto:Sarah_McKinnis@indian.senate.gov), [Anna\\_Powers@indian.senate.gov](mailto:Anna_Powers@indian.senate.gov),  
[darren\\_modzelewski@indiansenate.gov](mailto:darren_modzelewski@indiansenate.gov), [Christine.glassner@who.eop.gov](mailto:Christine.glassner@who.eop.gov)

**RE: Consensus Indian Country Opposition to Trump Executive Order “Continuing the Reduction of the Federal Bureaucracy” Targeting the CDFI Fund (March 14, 2025)**

Dear Treasury Secretary Scott Bessent, Deputy Assistant Secretary for Community and Economic Development Alexandria Smith, CDFI Fund Director Pravina Raghavan, and key members of Congress,

On behalf of the **Native CDFI Network, Oweesta Corporation, and the 84 co-signatory Native community development financial institutions (CDFIs) and other Indian Country partners and stakeholders**, we are writing to express our grave concern about the [executive order](#) (EO) “Continuing the Reduction of the Federal Bureaucracy” issued by President Trump on Friday, which targets the elimination or reduction in operational scope of seven federal agencies and offices, notably the CDFI Fund.

The EO, which purports to continue “the reduction in the elements of the Federal bureaucracy that the President has determined are unnecessary,” mandates that the “the non-statutory components and functions of the following governmental entities shall be eliminated to the maximum extent consistent with applicable law, and such entities shall reduce the performance of their statutory functions and

associated personnel to the minimum presence and function required by law.” It directs the head of the CDFI Fund and the other affected entities to submit within seven days “a report to the Director of the Office of Management and Budget confirming full compliance with this order and explaining which components or functions of the governmental entity, if any, are statutorily required and to what extent.”

It is our position that **this EO does not and should not apply in any material way to the CDFI Fund given that all the Fund’s basic functions are fully authorized through Congressional statute.**

Congress created the CDFI Fund in 1994 with broad bipartisan support through the [Riegle Community Development Banking and Financial Institutions Act](#) “to promote economic revitalization and community development through an investment and assistance program for community development financial institutions.” The CDFI Fund’s [Native Initiatives](#) – which includes the Native American CDFI Assistance (NACA) Program – was established in 2001 pursuant to the 1994 legislation’s [Native American Lending Study](#) to “generate economic opportunity for Native Communities by supporting the creation and expansion of Native CDFIs, which in turn help to create jobs, establish or improve affordable housing, and provide appropriate financial services and counseling within their communities.”

We also take the position that this attack on the CDFI Fund is unfounded, as Native CDFIs provide an extraordinary return on investment that is transforming the economies of Native and surrounding communities, particularly in rural areas. Native CDFIs are among the most efficient and impactful financial institutions in the nation, stretching their limited resources to drive economic growth in areas where traditional banks have failed or not even bothered to invest. In many, growing ways, Native CDFIs help the federal government fulfill its trust and treaty obligations to Tribal Nations by fostering economic opportunity and growth in their communities. Consider:

- A total of 64 Treasury-certified Native CDFIs and more than two dozen “emerging” Native CDFIs across the country currently provide essential financial services such as small business development loans, home mortgage and repair loans, consumer loans, and credit repair to tens of thousands of Native people in areas of the country where traditional banks are scarce or non-existent, including reservations and rural areas.
- Oweesta Corporation, through the tracking of its loan portfolio, shows Native CDFIs have made more than 32,000 loans totaling over \$1 billion dollars invested in Native communities over the past 25 years, and it currently has zero non-performing loans in its \$61 million active loan portfolio.<sup>1</sup>
- According to the Treasury Department, investments made in CDFIs produce an eight-fold return, with each \$1 awarded creating \$8 in private sector investments.<sup>2</sup>
- CDFIs are also safe investments, with a default rate on their loans of 0.36% in 2023, roughly half the rate of traditional banks.<sup>3</sup>

These and other data points and [stories of positive impact](#) explain why Native and other CDFIs have long enjoyed bipartisan support among those in Congress. For example, the [Community Development Finance Caucus](#) created by Senators Mike Crapo (R-ID) and Mark Warner (D-VA) now counts more than a quarter of the Senate as members. In response to Friday’s EO, Senators Crapo and Warner issued a [statement](#) reaffirming the bipartisan commitment of the Caucus to the CDFI Fund’s mission “to promote access to capital in our most underserved urban and rural communities.”

In closing, NCN, Oweesta Corporation, and the undersigned organizations categorically oppose any effort – through the application of this executive order or otherwise – to weaken or reduce the operational capacity of the CDFI Fund (through staffing cuts, for example) to administer the NACA Program, the [New](#)


[Markets Tax Credits](#) (NMTC) Program (which supports critical infrastructure development projects across Indian Country), and other key programs and activities in support of the difference-making work of the more than 90 Treasury-certified and emerging Native CDFIs across the country. We also oppose any effort by the Trump Administration or members of Congress to reduce or eliminate funding for the NACA Program or allocation authority for the NMTC Program.

We look forward to the opportunity to discuss this matter with you further, and we trust you will do everything in your power to protect the CDFI Fund.

Sincerely,



Pete Upton  
CEO  
Native CDFI Network



Chrystel Cornelius  
President & CEO  
Oweesta Corporation

Co-Signatory Organizations:

Amber Schulz-Oliver  
Executive Director  
**Affiliated Tribes of Northwest Indians (OR)**

Casey Pearlman  
Executive Director  
**Affiliated Tribes of NW Indians Economic Development Corporation (OR)**

Skya Ducheneaux  
Executive Director  
**Akiptan, Inc. (SD)**

Mary Miner  
Vice President, Community Development  
**Alaska Growth Capital BIDCO, Inc. (AK)**

Benjamin Reynolds  
Interim President  
**Alaska Mortgage Bankers Association (AK)**

Chèri Smith  
President and CEO  
**Alliance for Tribal Clean Energy (DC)**

Mytegia Lee  
Executive Director  
**Arizona Native Asset Coalition Corporation (AZ)**

Dara Duguay  
Executive Director  
**CBA Fund (DC)**

Tamra Marlowe De Nova  
Executive Director  
**Chehalis Tribal Loan Fund (WA)**

Tara De Leon  
CEO  
**Cheyenne & Arapaho Community Development Corporation (OK)**

Sean Winters  
Executive Director  
**Chi Ishobak, Inc. (MI)**

Cindy Logsdon  
CEO  
**Citizen Potawatomi Community Development Corporation (OK)**

Douglas Bystry  
President/CEO  
**Clearinghouse Community Development Financial Institution (CA)**

Jeff Tickle  
President/CEO  
**Cook Inlet Lending Center (AK)**

Bruce Brooks  
President and Interim CEO  
**Craft3 (OR and WA)**

Stacy Augustine  
President  
**CU Strategic Planning (WA)**

Kimberly Lyle  
Executive Director  
**Dorchester Bay Economic Development Corporation (MA)**

Patrick Cave  
Senior Vice President for Policy  
**Enterprise Community Partners (MD)**

Justin Huenemann  
President and CEO  
**First Peoples Fund (SD)**

Lakota Vogel  
Executive Director  
**Four Bands Community Fund (SD)**

Matthew Lewis  
Executive Director  
**Four Directions Development Corporation (ME)**

Ruth Barber  
Partner  
**FUND Consulting, LLC (IL)**

Tori Matejovsky  
Executive Director  
**Great Northern Development Corporation (MT)**

A. Gay Kingman  
Executive Director  
**Great Plains Tribal Chairmen's Association (ND)**

David Tam  
CEO  
**Grey Snow Management Solutions (KS)**

Jacqueline Pata  
Executive Director  
**Haa Yakaawu Financial Corporation (AK)**

Jeff Gilbreath  
Executive Director  
**Hawai'i Community Lending (HI)**

Rolina Faagai  
Executive Director  
**Hawaiian Lending & Investments (HI)**

Angelena Campobasso  
Business Operations Director  
**Healing Lodge of the Seven Nations (WA)**

Paula Gibson-Smith  
Board Treasurer  
**Hearts Gathered (WA)**

Tammy S. Rex  
Financial Institute Director  
**Hoopa Development Fund (CA)**

Alissa Charley  
Executive Director  
**Hopi Credit Association (AZ)**

Ravi Malhotra  
President  
**ICAST (CO)**

Rob Pero  
Founder  
**Indigenous Business Group (WI)**

Jael Kampfe  
President  
**Indigenous Impact Co. (MT)**

Eddy Edwards  
Executive Director  
**Lake Superior Community Development Corp. (MI)**

Shayna Ferguson  
Manager  
**Lakota Federal Credit Union (SD)**

Tawney Brunsch  
Executive Director  
**Lakota Funds (SD)**

Rob Aitken  
Executive Director  
**Leech Lake Financial Services (MN)**

Christopher Coburn  
Executive Director  
**Manzeska Ota Tsi - Place to Borrow Money (OK)**

Elena Gaarder  
CEO  
**Minnesota Consortium of Community Developers (MN)**

Colleen Steele  
Executive Director  
**Mazaska Owecaso Otipi Financial Inc. (SD)**

Angie Main  
Executive Director  
**NACDC Financial Services, Inc. (MT)**

Chris James  
President and CEO  
**National Center for American Indian Enterprise Development/Native Edge Finance (AZ)**

Pete Upton  
CEO  
**Native360 Loan Fund (NE)**

Thomas Ogaard  
President and CEO  
**Native American Bank (CO)**

Leonard Smith, Jr.  
CEO  
**Native American Development Corporation (MT)**

Lorraine Davis  
Founder and CEO  
**Native American Development Center (ND)**

Joseph Quintana  
Executive Director  
**Native Development Network (CA)**

Rollin Wood  
Executive Director  
**Native Partnership for Housing, Inc. (NM)**

Kim Pate  
Managing Director  
**NDN Fund (SD)**

Jonelle Yearout  
Executive Director  
**Nimiipuu Community Development Fund (ID)**

Dave Tovey  
Executive Director  
**Nixyaawii Community Financial Services (OR)**

Ross Welch  
Executive Director  
**North Edge Financing (CA)**

Shanna Shananaquet  
Executive Director  
**Northern Shores Community Development Inc. (MI)**

Kevin Walker  
President and CEO  
**Northwest Area Foundation (MN)**

Jordan Ruiz  
Executive Director  
**Northwest Native Development Fund (WA)**

Patrick Maloney  
Founder and Managing Director  
**Occam Advisors (OR)**

Nancy Jordan  
Executive Director  
**Pacific Northwest Tribal Lending (CA)**

Lei Riedel  
Director  
**Pakini Loan Fund (HI)**

Reynold Roeder  
Chief Executive Officer  
**Roeder & Company LLC (OR)**

Suzanne Anarde-Devenport  
Chief Executive Officer  
**Rural Community Assistance Corporation (RCAC) (CA)**

Lorrie Chavez  
Executive Director  
**Santo Domingo Tribal Housing Authority (NM)**

Jonathan Zurek  
Executive Director  
**Seneca Nation of Indians Economic Development Company (NY)**

Denise Zuni  
Attorney/Owner  
**Sh'eh Wheef Law Offices, PC (NM)**

Sharon Vogel  
Chair  
**South Dakota Native Homeownership Coalition (SD)**

Robin Danner  
Policy Director  
**Sovereign Council of Hawaiian Homestead Associations (HI)**



Michael Ching  
CDFI Director  
**Spruce Root, Inc. (AK)**

Michael Brydge  
Principal and Research Director  
**Sweet Grass Consulting, LLC (CO)**

Nora Mix  
Executive Director  
**Taala Fund (WA)**

Randy Nez  
Executive Director  
**Tamaya Housing Incorporated (NM)**

Shere Plank  
Acting Executive Director  
**Tatanka Funds Incorporated (SD)**

Russell Seagle  
CEO  
**The Sequoyah Fund, Inc. (NC)**

Sheila D. Herrera  
Executive Director  
**Tiwa Lending Services (NM)**

Alexander Sterling  
Chief Executive Officer  
**Turtle Island Community Capital (RI)**

Marcos Aguilar  
Executive Director  
**Tzicatl CDC (CA)**

Kitcki Carroll  
Executive Director  
**United South and Eastern Tribes Sovereignty Protection Fund (DC)**

Joseph Lapilio  
President and CEO  
**Wai'anae Economic Development Council (HI)**

Paul Huberty  
Executive Director  
**Wind River Development Fund (WY)**

Fern Orié

CEO

**Wisconsin Indigenous Economic Development Corporation (WI)**

Cheryl Cloud

CEO

**Wisconsin Native Loan Fund, Inc. (WI)**

Allyssa Verstoppen

Executive Director

**Woodland Financial Partners, Inc. (WI)**

E. Michael Silvas

Governor

**Ysleta del Sur Pueblo (TX)**

Sara Barbour

Executive Director

**Yurok Alliance for Northern California Housing (CA)**

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<sup>1</sup> Oweesta Corporation website, “Cumulative Community Impact” (<https://www.oweesta.org/>); Oweesta Corporation, *Oweesta Quarterly Report 2nd Quarter Fiscal Year 2025*, December 31, 2024.

<sup>2</sup> Treasury Secretary Janet Yellen (Native CDFI Network (NCN), *Native CDFIs: Stepping Up to Serve Indian Country Through the Pandemic and Beyond*, Native CDFI Network, July 2021, p. 1 (<https://nativecdfi.net/wp-content/uploads/2021/09/NCN-Pandemic-Report.pdf>).

<sup>3</sup> Opportunity Finance Network, “OFN Statement on Executive Order and Potential Threats to the CDFI Fund,” March 15, 2025 (<https://www.ofn.org/news/ofn-statement-on-executive-order-and-potential-threats-to-the-cdfi-fund/>).