



September 2, 2022

Samuel Stahlmann  
Consumer Access Coordinator  
Office of Credit Union Resources and Expansion  
National Credit Union Administration

**Re: Fair Break Federal Credit Union (Proposed)**

Dear Mr. Stahlmann:

We are writing to express Inclusiv's support for the creation of Fair Break Federal Credit Union ("Fair Break") to serve the Memphis community. We have recently welcomed Fair Break as an Associate Member of Inclusiv so it can access our programs and services.

Inclusiv is a national association of community development credit unions and a certified CDFI intermediary that raises and deploys capital into credit unions, builds capacity and supports credit unions to connect low-income people and communities to responsible financial products and services. The Inclusiv network is made up of 475 credit unions serving more than 15 million people in 46 states, DC and Puerto Rico. Our mission is to build the financial independence of low-income and underserved people through credit unions.

According to recent census information, Shelby County is Tennessee's most populous county with some 927,000 residents, of which more than 650,000 live in the city of Memphis. It is estimated that 160,000 county residents currently live in poverty, mainly concentrated within Memphis proper. Over the past several years, in the wake of the COVID-19 pandemic, non-predatory financial institutions have accelerated their retreat from the city's lower income communities. Often these communities are the very same that experienced the most powerful effects of the pandemic and ensuing economic downturn. Fair Break plans to meet community needs and fill this gap in services by opening within some of the same facilities currently being abandoned by mainstream lenders.

Inclusiv will provide Fair Break FCU mentorship and connections with newly chartered credit unions during the chartering process to ensure its success. We are arranging peer learning opportunities for Fair Break in the areas of credit union operations, IT systems, and financial management with Trust Federal Credit Union and others. Also, Inclusiv will help guide Fair Break to becoming certified as a Community Development Financial Institution, eligible for technical and financial assistance from the CDFI Fund. Once chartered, Fair Break FCU will also be eligible for secondary capital, social impact deposits, and other services from Inclusiv to help its long-term sustainability and self-sufficiency.



We are excited by the prospect of launching Fair Break to bring much-needed financial services and affordable loan products to the Memphis community.

Sincerely,

A handwritten signature in black ink, appearing to read "Cathleen A. Mahon". The signature is fluid and cursive, with a long horizontal stroke at the end.

Cathleen A. Mahon  
President and CEO