

**From:** [CCME](#)  
**To:** [Dickens, Michelle](#)  
**Subject:** FW: CDFI Request for Public Comments due November 5, 2020 for Proposed Changes to Certification - Lakeview Community Capital, LLC 181CE014761  
**Date:** Thursday, November 5, 2020 9:32:37 AM

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**From:** Karen Fugok <KarenFugok@lakeviewcommunitycapital.com>  
**Sent:** Wednesday, November 4, 2020 11:52 AM  
**To:** CCME <ccme@cdfi.treas.gov>  
**Cc:** Dickens, Michelle <dickensm@cdfi.treas.gov>  
**Subject:** [EXTERNAL]CDFI Request for Public Comments due November 5, 2020 for Proposed Changes to Certification - Lakeview Community Capital, LLC 181CE014761

To Tanya McInnis, Program Manager Certification, Compliance Monitoring and Evaluations (CCME), CDFI Fund:

In response to CDFI request for public comments, Lakeview Community Capital, LLC (LCC) requests clarification regarding the proposed change to the CDFI Annual Certification Report / Certification Application regarding certain Affiliates of NDI CDFIs to meet the Primary Mission (PM) requirement.

LCC (the Certified CDFI 181CE014761) is a subsidiary of Lakeview Loan Servicing, LLC ("LLS"). LLS's sole owner is ultimately an investment fund which is managed by its general partner (see more below) and owned by multiple investors, none of which hold an ownership interest in the fund that equals or exceeds 25 percent or singularly holds a majority. The power to exercise control of the investment fund resides with the general partner, which is an affiliate of Bayview Asset Management, LLC ("BAM"). As of 9/30/2020, BAM owns 1.126% of the investment fund.

LCC and its parent, LLS, work to improve economic conditions by providing affordable home mortgages to CDFI-targeted underserved populations, which helps promote financial access and community development.

**Would the proposed PM requirement apply to the entire family tree (LLS & BAM & any LLS/BAM investors) or just LLS?** We believe the PM requirement should stop at the parent LLS who is the only entity in the family with "control" of LCC the certified CDFI.

Thank you.

Best Regards,

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