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**To:** CDFIHELP  
**Subject:** Comments to CDFI CIIS PRA 2013-20891 due 10.28.2013

#### INSTITUTION LEVEL REPORT (ILR) for MAJOR URBAN AREAS

We cannot see how information is captured when an award goes to a non-profit corporation either formed by the government agency involved with the CDE using (original) governmental-owned land or a non-related non-profit organization using (original) government-owned land. There are lease and leasebacks not picked up by this form to facilitate the New Markets Tax Credit.

Leases create limited time for business operations.

Though jobs are recorded, we do not see any category that shows a person from a qualified census tract fills that job. Incubators create jobs and may be located in a qualified census tract, but the employees are not at any poverty level.

“Direct” and “indirect” categories have no meaning that would impact reduction of the unemployed or underemployed who live in qualified census tracts.

The current impression is to list the job openings in a local workforce center as a sufficient outreach. If no one applies, then the NMTC entity feels that have done their due diligence.

We find this misleading. Just what is the intention of the NMTC for long-term retention of jobs in these qualified census tracts for which the project was chosen.

Contracts are not necessary awarded on a Request for Proposal basis as we see some vendors chosen for Sole Source contracts. There is no opportunity for minority or women owned businesses, so necessary in underserved areas.

California is in the processes of dispersing assets of the Redevelopment Agencies in the State. Those agencies were legislated to cease business.

What we see is the CDE as a replacement entity to place those Redevelopment originated projects into existence.

#### TRANSACTION LEVEL REPORT

You state:

*In other words, for each investment in a CDE, the Allocatee must report a minimum of two transactions: (1) The investment in the CDE and (2) the resulting loan or investment in the QALICB(s). The two transactions may occur during different reporting periods.*

QALICB Qualified Active Low-Income Community Businesses are weak in definition. Gentrification is a problem with this weak definition.

Related Entities need identification as to their relationship. We see Limited Liability Corporations formed just to suffice a paper transfer.

So far, only construction jobs present an opportunity for employment in QALICB projects with short term employment.

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