



June 5, 2019

The Honorable Mike Crapo Chairman Senate Banking, Housing and Urban Affairs Committee Washington, D.C. 20510 The Honorable Sherrod Brown Ranking Member Senate Banking, Housing and Urban Affairs Committee Washington, D.C. 20510

Dear Chairman Crapo and Ranking Member Brown:

We, the undersigned State Credit Union Associations/Leagues (Leagues), which comprise the American Association of Credit Union Leagues (AACUL), join with the Credit Union National Association (CUNA) to express our strong desire for the Senate Banking, Housing, and Urban Affairs Committee to conduct hearings to discuss safe banking options for businesses operating in the legal cannabis industry. Our Leagues and CUNA represent credit unions across the nation and their 115 million members. We respectfully request that you include this letter in the official hearing record.

Currently, thirty-four states and the District of Columbia have medical cannabis programs, and ten states have recreational cannabis programs. The businesses that serve these jurisdictions are thriving and are expected to continue to grow at a fast pace. Although this industry seems to have reached critical mass for future operation, the legislative and regulatory frameworks have not kept pace. A discussion of proposed resolutions to these issues is warranted.

The lack of legal and regulatory guidance on banking for legitimate cannabis business has created a dangerous and costly environment for all involved since they now must operate on an almost all-cash basis. Not only do the employees have to transact with and transmit large amounts of cash daily, often tens of thousands of dollars at a time, but the states must also collect taxes and licensing fees in cash, which increases compliance and administrative costs for the state and the business. Since cannabis remains a schedule I drug, and legal cannabis businesses have trouble finding banking services, we urge you to move forward with hearings to explore remedies to these issues. We are in support of S. 1200 - Secure And Fair Enforcement Banking Act of 2019 (SAFE Act), the banking related provisions in S.1028 - The Strengthening the Tenth Amendment Through Entrusting States (STATES Act) and would generally support other similar measures that this committee may move forward with that would remedy the specific banking issues that we have outlined. There is no legitimate reason for Congress to postpone further discussion of, and action on, these genuine issues.

Credit unions always have and will continue to serve their members to the best of their abilities; however, a lack of guidance and a shaky legal foundation for working with

cannabis-related businesses make it very difficult for us to accomplish this mission. If the states continue to allow cannabis businesses to operate legally within their jurisdictions, of which we remain neutral on the issue, it only makes sense to allow for appropriate banking options. Once again, we urge you to move forward with hearings on safe and efficient banking options for the cannabis industry.

Thank you for your attention to our views, and we look forward to continued partnership moving forward.

Sincerely,

Scott Simpson, AACUL Chairman & President and CEO Utah Credit Union Association

Anthony Rizk, Vice Chair

Anthony Rizk, Vice Chair Alaska Credit Union League

Diana-Dykstra, President and CEO California & Nevada Credit Union Leagues

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Ron McLean, President and CEO Cooperative Credit Union Association

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Kelly Fuhlbrigge, JP, Government Relations The Connecticut League of Credit Unions

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Dan Schline, President and CEO Carolinas Credit Union League

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Dave Adams, President & CEO Michigan Credit Union League & Affiliates

Charles Elliott, President and CEO Mississippi Credit Union Association

Scott Earl, President and CEO Mountain West Credit Union Association

Brad Douglas, President and CEO Heartland Credit Union Association

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John Bratsakis, President and CEO Maryland | DC Credit Union Association

Mark Cummins, President and CEO Minnesota Credit Union Network

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Brett Thompson, President and CEO Wisconsin Credit Union League