

**From:** [Jesse E. Matheny](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [Schmidt, Barry](#)  
**Subject:** [Jesse Matheny] Comments on Part 704 Corporate Credit Unions  
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My name is Jesse Matheny and I serve as secretary of the board of directors of the Decatur Earthmover Credit Union, a 'real person credit union' in Decatur, Illinois, with over 26,000 depositor members and assets in excess of \$200,000,000.

Statements for NCUA board of directors

Comments on **12 C.F.R. Part 704** (Proposed Regulation)

- 1) A functioning central or corporate credit union serves a valuable function for our credit union and for most others. The system needs to remain in place and needs to be able to offer competitive rates for services. Many credit unions need the services to continue serving members and will be driven to purchase services at the best prices (lowest cost). Major increases in cost of services from corporate credit unions, due to the impact of proposed changes would drive credit unions to purchase services from banks to get many tasks accomplished.
- 2) When the deposits of 'real person' credit unions were carelessly invested in mortgage-backed securities they were put at great risk. When the legacy assets were devalued, the losses were losses of members. These securities (legacy assets) should be returned to the depositor credit unions so that members can benefit from the worth of their share of eventual value when such assets are liquidated.

Jesse Matheny

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