

JEFFREY E. FORT
ATTORNEY AT LAW

jfort@jfortlaw.com
www.jfortlaw.com

Fort Law Firm, LLC
413 North Main Street
Findlay, Ohio 45840
419-356-3984
Fax: 419-422-1122

January 13, 2011

Ms. Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Re: Notice of Proposed Rulemaking for Part 704 – Corporate Credit Unions

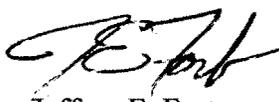
Dear Ms. Rupp:

I am on the Board for and writing on behalf of Millstream Area Credit Union in Findlay, Ohio, which has been privately insured through American Share Insurance of Dublin, Ohio (“ASI”) for many years.

Our Board is very concerned regarding your agency’s attempt to seek “voluntary contributions” from non-federally insured credit unions (non-FICUs) to the Temporary Corporate Credit Union Stabilization Fund (TCCUSF). We are incredulous that your federal agency thinks that it can, in effect, extort funds from us by asking a third party to take the action of “expelling” us from a corporate credit union. I am confident that you have no legal right to attempt to charge Millstream via a voluntary contribution for losses that occurred in your fund and not our fund with ASI. Would that we all had such imaginary power to solicit funds from unrelated entities!

I would appreciate your sharing our credit union’s objection with your Board and chairman.

Sincerely,



Jeffrey E. Fort