

**From:** [Ron Berry](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments on Proposed Rule, Appendix B of Part 701  
**Date:** Wednesday, January 20, 2016 1:30:11 PM

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Dear Secretary of Board Poliquin,

Pasadena Federal Credit Union is dedicated to serving the underserved. We are very active in the Pasadena community with several non-profits in our FOM. We work with the Pasadena Police department helping with the reintegration program (a California initiative) that allows early release of non-violent felons. Our current role is to teach financial literacy. They are clients of one of our SEGs who assists them in finding jobs and hopefully deter them from returning to the crimes (burglary, drug dealings etc.) that led to their incarceration. Many of their clients cannot get financial services due to Chex system violations. We would like to help them but need to have the FOM expanded to include clients of this non-profit organization (Flintridge Center [http://www.flintridge.org/about\\_us/](http://www.flintridge.org/about_us/) ).

In a similar example, we serve Union Station Homeless Services and are the Credit Union for their Employees and Volunteers. We hold monthly financial literacy programs and have been asked to help their clients (homeless adults and families just getting back on their feet) obtain financial services. We offer low balance credit cards to help our members re-establish their credit and free checking but these recovering homeless do not qualify because they are "Clients". We also have a group of employees that cook and serve dinner to the families. (<http://unionstationhs.org/> )

A third example is a recent addition to our FOM, Hillside Moving On. This is an organization that houses foster children but also has an arm that is specifically for emancipated youth who have turned 18 and are "Kicked" out of the foster care system. Many times with their total belongings in a plastic trash bag. We offer Credit Union services to their employees and volunteers and hold regular financial literacy programs for their emancipated youth but cannot help these young adults obtain financial services. (<http://www.youthmovingon.org/> )

I am sure there are many Credit Unions in the U.S. that face the same challenges serving truly needy members of our community. If your group is dedicated to expanding and updating FOM qualifications, I might suggest you include "Clients" of these types of organizations. It is a different than say a Golf Pro's clients who pays to learn the game. These are individuals working to get back on their feet and do not pay for the services these generous organizations are providing. My suggestion is to allow clients of Social Service Organizations membership in their credit union.

Thank you very much for the opportunity to comment on this proposed regulation. I applaud the agency's willingness to amend the Chartering and FOM Manual to provide much-needed relief for the credit union industry.

Sincerely,

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