

**From:** [Jeffrey L Gerhart](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Bank of Newman Grove on Chartering and Field of Membership Proposed Rule  
**Date:** Friday, November 22, 2019 11:30:08 AM

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Dear Secretary of the Board Poliquin,

I am writing in response to the National Credit Union Administration's (NCUA) proposal to amend its chartering and field of membership (FOM) rules with respect to applicants for a community charter approval, expansion, or conversion. Bank of Newman Grove does not believe that the proposed framework will adequately guard against discriminatory redlining and recommends that NCUA adopt the anti-discrimination tools utilized by other federal banking agencies.

Sincerely,

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Chairman  
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