

## BOARD ACTION MEMORANDUM

**TO:** NCUA Board  
**FROM:** Regional Director  
Mark A. Treichel  
**DATE:** September 7, 2004  
**SUBJ:** Request from First Community Federal Credit Union, #02885, to Expand its Community Charter Boundaries. Assets: \$255,166,858 as of June 30, 2004.

**ACTION REQUESTED:** NCUA Board approval of First Community Federal Credit Union's request to expand its community charter boundaries, as authorized by §109 of the Federal Credit Union Act.

**DATE ACTION REQUESTED:** September 23, 2004.

**OTHER OFFICES CONSULTED:** Office of General Counsel and Office of Examination & Insurance.

**VIEWS OF OTHER OFFICES CONSULTED:** Both offices concur.

**BUDGET IMPACT, IF ANY:** None.

**RESPONSIBLE STAFF MEMBER:** Regional Director Mark A. Treichel

**SUMMARY:** First Community Federal Credit Union complied with all NCUA requirements for expanding its community charter boundaries. Management demonstrated that the proposed service area meets NCUA's local community requirements and that the proposal is economically advisable.

First Community Federal Credit Union's board of directors demonstrated that the area under consideration -- 9 contiguous counties in Southwestern Michigan -- is a local community. Several state government entities and local community organizations specifically name the nine counties under consideration as their coverage areas to develop small business initiatives, improve public education, and maintain the area's infrastructure. The 937,037 residents also interact by traveling along common roadways, shopping at common trade areas, attending common cultural venues, and receiving news from common media outlets.

First Community Federal Credit Union has sufficient resources to serve the expanded field of membership. The business plan details how the officials will market to the entire community. The marketing objectives are consistent with management's desire to offer more low-cost financial service choices to all of the residents.

**RECOMMENDED ACTION:** Board approval of First Community Federal Credit Union's request to expand its community charter boundaries and serve persons who live, work, worship, or attend school in and businesses and other legal entities located within Allegan County, Michigan; Barry County, Michigan; Berrien County, Michigan; Branch County, Michigan; Calhoun County, Michigan; Cass County, Michigan; Kalamazoo County, Michigan; St. Joseph County, Michigan; or Van Buren County, Michigan.

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Regional Director Mark A. Treichel  
Region I (Albany)