

April 15, 2010

Ali J. Cotton  
(b)(6)

Re: Freedom of Information Act appeal dated March 23, 2009

Dear Mr. Cotton:

On March 1, 2010, you filed a Freedom of Information Act (FOIA) request for proof of insurance coverage for Schools Federal Credit Union or Schools Financial Credit Union on July 30, 1996 and First Financial Credit Union or First U.S. Community Credit Union on December 12, 1995 along with all premium payment schedules, payment receipts and delinquency notices that show that the credit unions were insured. On March 19, 2010, your request was granted in part. Staff attorney Linda Dent provided you with certificates of insurance for Schools Financial Credit Union, charter number 68398 and First U.S. Community Credit Union, charter number 68474. No records were found responding to the portion of your request concerning schedules, receipts and delinquency notices. On March 23, 2010, you appealed Ms. Dent's response, again requesting the same records. Your appeal is denied in that Ms. Dent has provided the records we have responding to your request, that is proof of insurance for the two credit unions as noted above. No additional records were found. Below we provide some information regarding the history of the two credit unions and their use of different names and charter types.

Federally insured credit unions can be chartered by the state, in which case they are referred to as federally insured, state chartered credit unions or FISCUs, or they can be chartered by the NCUA, in which case they are referred to as federal credit unions or FCUs. Federally insured credit unions do sometimes convert from an FCU to a FISCU or from a FISCUS to an FCU. Credit unions can and do change their names, in the event of a conversion and at other times (e.g. when their field of membership changes). All of the credit unions discussed below were federally insured on the dates you noted (in 1995 and 1996), either as FISCUS or FCUS; they have remained federally insured.

#### Schools Federal Credit Union and Schools Financial Credit Union

Schools Financial Credit Union, a FISCUS with charter number 68398, is located in Sacramento. Schools Financial Credit Union was originally chartered as School Employees Credit Union, a California chartered credit union (FISCUS). In September of 1987, School Employees Credit Union converted to a federally chartered credit union (an FCU) and its name was changed to Schools FCU. In April of 1999, Schools FCU converted back to a California chartered credit union (a FISCUS) and on June 1, 1999 its

Mr. Ali J. Cotton  
April 15, 2010  
Page 2

name was officially changed to Schools Financial Credit Union. Schools Financial Credit Union has continued to operate as a FISCU from 1999 to the present. From 1987 until early 1999, the credit union operated as an FCU with the name Schools FCU.

First Federal Credit Union and First US Community CU

First US Community CU, a currently operating FISCU, previously operated under the name First FCU. The relevant history of the credit union follows. Prior to 1983, the credit union was an FCU with the name Sacramento US Employees FCU. In March of 1983, the credit union changed its name to First Federal Credit Union, also an FCU (First FCU). It operated as First FCU from March 1983 until March, 2001, when First FCU converted to a FISCU and changed its name to First US Community CU. First US Community CU has continued to operate as a FISCU since March of 2001.

Pursuant to 5 U.S.C. 552(a)(4)(B) of the FOIA, you may seek judicial review of this determination by filing suit against the NCUA. Such a suit may be filed in the United States District Court where you reside, where your principal place of business is located, the District of Columbia, or where the documents are located (the Eastern District of Virginia).

Sincerely,

Robert M. Fenner  
General Counsel

GC/HMU:bhs  
GC 10-0415  
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2010-APP-00005