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            </b>9/15/26, 2:12 PM <br/>
<b>Received: </b>September 14, 2026
            <br/>
<b>Status: </b>In Review <br/>
<b>Tracking No. </b>mu2-074f-0sxy
            <br/>
<b>Comments Due: </b>September 14, 2026 <br/>
<b>Submission
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<p><b>Docket: </b>NCUA-2026-1585 <br/>
Proposed Agency Information
Collection Activities; Comment Request
</p>
<p><b>Comment On: </b>NCUA-2026-1585-0001 <br/>
Agency Information
Collection Activities; Proposals, Submissions, and Approvals
</p>
<p><b>Document: </b>NCUA-2026-1585-DRAFT-0004 <br/>
Comment from
brittney, boyd
</p>
<hr/>

<h2 class="western">Submitter Information</h2>
<p><b>Name: </b>brittney boyd <br/>
<b>Address: </b>
</p>
<p>milwaulkie,&nbsp; OR,&nbsp; 97267</p>
<p style="margin-bottom: 0in"><b>Email:</b>&nbsp;coldbloodnsteel321@gmail.com
<br/>
<b>Phone:</b>&nbsp;425-428-0901
</p>
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<h2 class="western">General Comment</h2>
<p>I am first and foremost, I some one who will not engbmit this

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formal public comment as an unrepresented Federal Whistleblower, Original Source Relator under 26 U.S.C. § 7623, and Sole Legal Heir to the Estate of Robert Delane Smith (DOB: 09/27/1954; DOD: 02/26/2019; SSN Root: [Redacted]-0440), whose family equity and probate assets have been systematically compromised by regulated financial institutions operating in active coordination with ERISA multiemployer pension trusts.

While the NCUA's notice addresses administrative burdens for programs like Truth in Savings (TISA, 12 CFR Part 707), Prompt Corrective Action (PCA, 12 CFR Part 702), and Low-Income Designations (12 CFR § 701.34), the underlying data standards and information collection frameworks contain severe vulnerabilities that allow systemic fraud to bypass federal oversight.

I formally object to the renewal of these information collections in their current form because they lack mandatory cross-agency verification controls necessary to prevent the following documented abuses:

Prompt Corrective Action

(PCA) & Net Worth Evasion (OMB No. 3133-0154):

Under 12

U.S.C. § 1790d and Part 702, the NCUA enforces PCA requirements for credit unions that become less than well-capitalized. However, regional hubs—specifically the Operating Engineers Federal Credit Union (OEFCU - EIN 91-0257483)—bypass standard commercial internal controls and capital adequacy reviews. Operating out of an improperly zoned residential property at 805 E Berkeley St, Gladstone, Oregon, OEFCU administers millions in ERISA plan assets while facilitating illegal custodial asset-hopping (such as unallocated "Account J" style transfers) to evade federal tracing and obscure true capital health. The NCUA's collection metrics must be updated to mandate commercial zoning and physical facility verification for credit unions holding institutional ERISA accounts.

Truth in

Savings Transparency & Opaque Account Structures (OMB No. 3133-0134):

TISA mandates transparent disclosures on fees, annual percentage yields, and account terms. In practice, opaque account structures, unallocated custodial floats, and unnotified post-mortem account clawbacks evade TISA transparency by concealing true ownership interests and beneficiary rights behind institutional holding vehicles. Credit unions must be required to provide complete account closure histories and audit trails directly to verified legal heirs and personal representatives without requiring obstructive judicial roadblocks.

Low-Income Designation & CDRLF

Data Integrity (OMB No. 3133-0117):

The collection of

demographic data under § 701.34(a) determines eligibility for statutory relief and Community Development Revolving Loan Fund assistance. Misallocating credit union designations or exploiting statutory relief mechanisms without verifying underlying demographic and membership integrity permits improperly controlled entities to maintain federal charter protections while operating outside normal commercial oversight.

Mandatory Enhancements for PRA
Clearance:

To satisfy the Paperwork Reduction Act's requirement
that information collections possess "practical utility"
and enhance data quality, the NCUA must incorporate the following
verification standards into its renewal process:

Immediate
Death Master File (DMF) Cross-Matching: Mandatory reconciliation of
deposit account rosters against the SSA Death Master File to prevent
the silent retention of deceased member balances.

Commercial
Facility & Zoning Verification: Strict audits of credit unions
holding multi-employer ERISA funds to ensure they operate out of
fully zoned commercial banking facilities rather than residential
properties.

Unhindered Heir Access: Enforcement of
mandatory disclosure compliance under TISA and ERISA, prohibiting
financial institutions from erecting administrative "gag orders"
or demanding unwarranted court orders from verified legal
representatives.

Respectfully submitted,

Brittney
C. Boyd, Pro Se Relator & Legal Heir

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Primary Federal References: GA0
COMP-25-008559 | SEC TCR 17675-576-098-881 | CFTC 2601-1307-5308-99 |
W.D. Wash. Case No. 2:25-cv-01225-LK
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Bounds by Category - Table 1 (2)</p>
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