

January 5, 1998

James Benjamin, President
Rockford C.I.E. & G. Co. Employees Federal Credit Union
714 - 7th Street
Rockford, Illinois 61104-1388

Re: FCU Bylaw Dispute, Your letter dated October 29, 1997.

Dear Mr. Benjamin:

Chairman D'Amours has referred your letter dated October 29, 1997 to the Office of General Counsel for a response. You have raised several issues concerning the interpretation of your federal credit union's (FCU's) bylaws. On October 17, 1997, Nicholas Veghts, Region IV Director, responded to your concerns. We concur with his response.

In addition to an interpretation of your bylaws, you are also asking NCUA to conduct an internal investigation into board procedures at your federal credit union. This again involves an internal dispute among the board members. As Region IV has advised you, it is NCUA's policy not to become involved in disputes among board members.

You may wish to refer these matters to your FCU's Supervisory Committee. An FCU's Supervisory Committee is authorized to investigate and call a special meeting "to consider any violation of the Act, the regulations, or the charter or the bylaws of this credit union, or to consider any practice of this credit union, which the committee deems to be unsafe or unauthorized." Federal Credit Union Bylaws, Art. X, Section 6.

Sincerely,

Sheila A. Albin
Associate General Counsel

GC/MFR:bhs
SSIC 6100
97-1220

cc: Chairman D'Amours