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FROM: Assistant General Counsel  
Hattie M. Ulan

SUBJ: Nonstandard Bylaw Amendments (Your March 24, 19989, Memo)

DATE: April 14, 1989

You have requested our opinion on a nonstandard bylaw amendment to Article VI, Section 8, paragraphs c. and d. The changes to paragraphs c. and d. are intended to streamline the FCU's election procedures. The standard bylaw amendments provided by NCUA permit ballot box voting from a period of time, tally by the tellers, and then an opportunity for amendment would have all voting conducted via the ballot boxes prior to the meeting; no voting would take place at the annual meeting. In addition, the management official would be given the vote tally. Under the standard amendment, tallies are placed in the ballot box by the tellers and the boxes are resealed.

The nonstandard bylaw amendment does not violate the Federal Credit Union Act or NCUA's Rules and or Regulations. Any safety and soundness considerations remain in your discretion.