



National Credit Union Administration

Southern Region

June 4, 2024

SENT BY EMAIL

Mr. Steve L. Snider

[stevesnider@cinci.rr.com](mailto:stevesnider@cinci.rr.com)

Dear Mr. Snider:

Under § 212 of the Federal Credit Union Act, 12 U.S.C 1790a(b), and NCUA regulation § 701.14, we received your application to serve as a supervisory committee member for the Butler Heritage Federal Credit Union (Butler Heritage). Due to NCUA regulation, 12 C.F.R. §701.14, Butler Heritage is required to seek NCUA approval when proposing a change in a board member, committee member, or senior executive officer. We will not process your application to be a supervisory committee member, because Butler Heritage's board did not appoint you.

NCUA's Rules and Regulations do not require credit unions to seek our approval to adopt standard bylaws, 12 C.F.R. Part 701, Appendix A. NCUA's Office of General Counsel confirms that when Butler Heritage's board adopted standard bylaws by a two-thirds vote in December 2023, our approval was not necessary, and the standard by-laws replaced the old by-laws adopted in 1956. Our review indicates the election, held as part of the annual meeting on April 18, 2024, was conducted in accordance with the bylaws the board adopted in December 2023. Accordingly, the board members elected under the new bylaws are the official representatives of the credit union.

The board elected under the December 2023 bylaws did not propose your appointment. Rather, your appointment came from a separate group of members purporting to conduct an election in accordance with the old bylaws which were no longer in effect. The purported election held by these other members under the old bylaws was improper; therefore, those members do not represent Butler Heritage. In addition, any appointments to committee positions, including the supervisory committee, by these individuals are also invalid.

If you have any questions, please contact the Division of Supervision at [southerndosmail@ncua.gov](mailto:southerndosmail@ncua.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Keith Morton".

C. Keith Morton  
Regional Director

S\DOS\CLM:CLM  
FCU 11440 – O/6

Mr. Steve L. Snider

June 4, 2024

Page 2

ecc: Board Chairman John Terrell [jterril1960@gmail.com](mailto:jterril1960@gmail.com)  
SE Mark Painter  
DE Rebecca Humphrey