April 26, 1994

Joan Lucas President Wyoming Credit Union League 800 Werner Court Suite 180 Casper, WY 82601

Re: Wyoming Uniform Unclaimed Property Act 'Dormant and Unclaimed' Accounts -- Dormant Account Fees (Your Letter of April 8, 1994)

Dear Ms. Lucas:

You requested a legal opinion regarding the accuracy of a legal opinion from the attorney to the Wyoming Credit Union League regarding the above-referenced topics. See Letter from Thomas M. Hogan, Esq., Hogan & Company, to you, Re: Wyoming Uniform Unclaimed Property Act, 'Dormant and Unclaimed Accounts -- Dormant Account Fees, dated March 22, 1994 (the "Hogan Letter," attached). We have reviewed the Hogan Letter and find its discussion of federal law accurate. For further information, we also refer you to the recent NCUA legal opinion letter previously sent to you. See Letter from Richard S. Schulman, Acting Associate General Counsel, to Deno Sterzinger Howard, Staff Attorney, Minnesota League of Credit Unions, Re: Membership Shares and Escheat, dated January 7, 1994.

Sincerely,

James J. Engel Deputy General Counsel

GC/MSC:sg SSIC 3320 94-0409