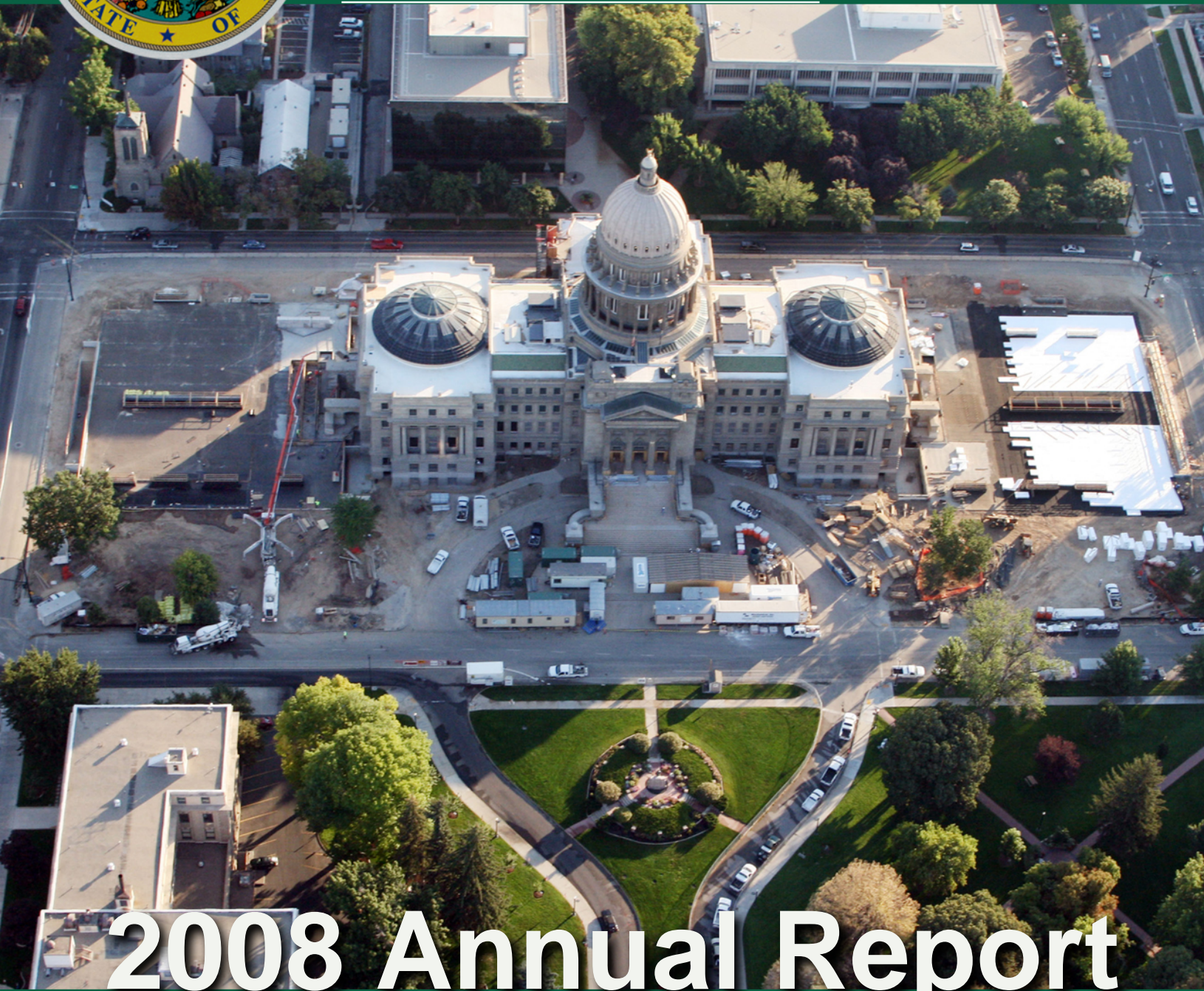




IDAHO

DEPARTMENT OF FINANCE



2008 Annual Report

Protecting the Integrity of Idaho Financial Markets Since 1905

C.L. 'Butch' Otter
Governor

Gavin M. Gee
Director



IDAHO

DEPARTMENT OF FINANCE

July 1, 2008

THE HONORABLE C. L. "BUTCH" OTTER
GOVERNOR, STATE OF IDAHO

Dear Governor Otter:

I am pleased to submit herewith the 103rd Annual Report of the Department of Finance for fiscal year 2008, July 1, 2007 through June 30, 2008. To the extent material events have transpired between the end of the fiscal year and the writing of this Report, those events have been included.

The economic upheaval during the past fiscal year, and in the months following, has transformed the financial world. The subprime mortgage meltdown was the first in a series of fateful events contributing to a global credit crisis, the closure of many long-standing financial firms, and unprecedented intervention by governments and central banks attempting to restore economic stability. Although the economy is predicted to weaken and lose jobs, Idaho fundamentals remain positive. Idaho benefits from strong in-migration, low-cost dependable energy and low business costs – especially labor. In fact, according to a report released by the Census Bureau, Idaho was fourth behind Nevada, Arizona and Utah in the category of fastest growth in population as of July 1, 2007. In 2008, Idaho was ranked as the fifth lowest cost state in which to do business by the Milken Institute. All of this should help Idaho, and Idaho-based companies in the financial sector, rebound from the housing correction.

Key performance measurements of Idaho financial services firms reflect continued growth and expansion of services throughout the state. Securities issuer filings increased 5.1% over fiscal year 2007 filings. Likewise, the number of securities firms and agents registered in Idaho increased nearly 5.8% over the previous fiscal year, to a record total of 82,004.

Idaho's community banks remain in excellent condition and continue to play an integral part in the state's economic growth. The Department issued one new bank charter this fiscal year for Western Capital Bank in Boise, and community bank expansion provided additional financial service choices in smaller communities where there were none. Idaho based financial institutions continue to outperform the nation and reported higher profitability, higher levels of capital, and stronger asset quality than all institutions in the nation as of the second quarter of 2008.

At the same time, Idaho chartered credit unions continued to grow. Total assets grew by \$142.9 million, a rate of 9.02 percent. Branch expansion among both community banks and credit unions was active, providing additional choices for Idaho consumers.

These increases in the financial services sector generate commensurate increases in the workload of our staff. Our employees have been up to the task and have done a superb job, pursuant to

your administration's goals of providing quality and efficient service to our many stakeholders. This is in addition to the increased efforts of the employees to promote economic development, reduce regulatory burden, improve financial literacy, and protect consumers in the state.

The Department continues its participation in Small Business Information Fairs throughout the state, and educational efforts for industry. Again this year, consumer educational efforts remained a priority. For example, as in past fiscal years, Department employees made financial education presentations to high school students, remained active in the Idaho Financial Literacy Coalition, and co-sponsored and participated in the State Treasurer's Smart Women, Smart Money Financial Conference. We continued this year to participate in the Idaho Supreme Court's Guardianship Monitoring Project, primarily providing financial review of documents submitted by conservators and trustees in Bannock and Caribou counties. Finally, consumer protection efforts of the Department continue to result in money being returned to Idaho residents who are victims of fraud or other violations of law.

This Annual Report contains many other highlights of Department initiatives for both industry and consumers. I express my sincere appreciation for the support we have received from you, your staff, the Legislature, the industries we regulate and their associations, and our national associations, and for the dedication of our employees.

Sincerely,

GAVIN M. GEE
Director of Finance

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FOREWORD

The Department of Finance is a regulatory agency charged with the supervision and oversight of state-chartered financial institutions, regulated lenders, securities issuers, broker-dealers and stockbrokers, residential mortgage brokers, lenders, and loan originators, investment advisers and sales personnel, collection agencies, endowed care cemeteries, and others. The Department administers nine distinct programs. Two of these programs relate to the Department's internal operations, while the other seven involve the administration and enforcement of the following twenty-two regulatory statutes:

Idaho Bank Act
Idaho Bank Holding Company Act
Idaho Interstate Banking Act
Idaho Interstate Branching Act
Idaho International Banking Act
Idaho Trust Institutions Act
Idaho Savings Bank Act
Business And Industrial Development Corporation Act (BIDCO)
Idaho Credit Union Act
Idaho Money Transmitters Act
Idaho Financial Fraud Prevention Act

Idaho Credit Code
Idaho Mortgage Company Act
Idaho Collection Agency Act
Idaho Uniform Securities Act
Idaho Residential Mortgage Practices Act
Business Combination Act
Control Share Acquisition Act
Idaho Commodity Code
Endowment Care Cemetery Act
Continuing Care Disclosure Act
Idaho Escrow Act

MISSION STATEMENT

The mission of the Idaho Department of Finance is to aggressively promote access to vigorous, healthy and comprehensive financial services for Idaho citizens. This is accomplished through prudent and efficient oversight of financial institutions, investment opportunities, and credit transactions. Through administration of laws enacted by the Idaho Legislature, legitimate financial transactions are encouraged, while fraud, unsafe practices, and unlawful conduct are detected and appropriate enforcement action is taken.

The Department is funded entirely by fees levied by law on the industries subject to its supervision. A list of prior Commissioners/Directors of the Department of Finance is

shown in Exhibit I, and a summary of income and expenses and personnel status is shown in Exhibit II. Exhibit VII provides a list of the Department's staff.

DEPARTMENT HIGHLIGHTS AND CURRENT ISSUES

The Department, originally known as the Idaho office of “State Bank Commissioner,” was created March 6, 1905. At that time, the Department administered only one law, the *Idaho Bank Act*, and regulated only the banking industry. Today, the Department oversees more than 152,000 entities in 15 different financial service industries with combined assets in the billions. The Department delivers services through three operating bureaus: Financial Institutions, Securities, and Consumer Finance. Each bureau delivers services in both a regulatory capacity and as a consumer protection and education advocate.

National and Regional Economic Update – The National Bureau of Economic Research recently dated the start of the recession in December 2007. On average, economists expect the downturn to conclude in June 2009. The recessions of 1973-75 and 1981-82 both lasted 16 months, making this recession the longest downturn since the Great Depression. It is important to note, however, that this recession appears in some respects to be less intense than those in the 1970’s and 1980’s; this is likely because the business community anticipated a downturn months in advance. Many economists also note that this recession has hit consumers, through declining home prices, reduced values of retirement and other investment accounts, and job losses, harder than businesses.

Idaho Economic Conditions – As noted in the July 2008 *Idaho Economic Forecast*, published by the State of Idaho Division of Financial Management, Idaho’s economic growth slowed this year and jobs data showed markedly poorer employment performance than expected. These factors suggest tougher economic times ahead in Idaho. In fact, the *Idaho Economic Forecast* suggests that the “next couple of years will be the most challenging in decades for the state’s economy.”

In addition to the factors affecting the national economy, Idaho experienced further job reductions at its largest private employer, Micron Technology. A difficult housing market and declines in related construction employment both continued this past year. In fact, the higher than anticipated decline in employment is a significant contributor to the

current weakening of Idaho's economy. Idaho economists do not see Idaho's employment situation improving until 2010. With regard to the financial sector of Idaho's economy, the October 2008 *Idaho Economic Forecast* notes:

Financial services employment will feel the pinch of the cooling housing market and tighter credit. . . . After expanding by an average of around 6.5% in both 2005 and 2006, financial service's payroll growth will average just 0.4% annually over the forecast period.

Idaho based financial institutions continue to outperform financial institutions nationwide. Moreover, in the midst of the financial turmoil, Idaho-based financial institutions continue to report greater profitability, higher levels of capital, and stronger asset quality. Although deposit growth declined slightly over the past 12 months, Idaho based banks continue to increase their market share of those deposits. These positive factors are testament to sound management practices of Idaho's state-chartered banks, even during times of economic slowdowns and market challenges.

The credit union industry as a whole remains healthy, as are Idaho-chartered credit unions. Idaho credit unions continued their positive growth trends in assets, shares (deposits) and loans. As might be expected under the current economic conditions, delinquency ratios rose slightly in 2007. Overall net worth increased to 9.36 percent from 9.02 percent in 2006 and net income for 2007 was \$15.3 million, an increase of \$1.8 million over the prior year. Additionally, five new credit union branches were approved and opened creating additional choices for Idaho consumers.

The condition of credit markets had a significant impact on mortgage lending during the fiscal year. Idaho, along with other states, have been proactive in seeking ways to regulate the mortgage industry for many years. A significant element to creating efficiencies in mortgage regulation has been the implementation of the Nationwide Mortgage Licensing System (NMLS), discussed more fully below.

State and federal authorities have also coordinated their efforts to regulate the mortgage industry in other ways. A summary of three major regulatory initiatives adopted or implemented during the fiscal year are as follows:

- The publication of interagency guidelines for subprime lending and the subsequent issuance of parallel guidance for state-supervised entities, followed by state-developed model examination procedures to test and monitor providers' adoption of these guidelines;
- The utilization of a multi-state protocol for examination and enforcement alliances to build upon the success of previous state predatory lending enforcement cases; and
- The utilization of a state-federal pilot examination program which brings state examiners together with examiners from the various federal financial regulators to conduct simultaneous examinations of mortgage companies whose separate charters cross federal and state jurisdiction.

Global Financial Turmoil – In light of the events that have taken place over the past two years, this report would not be complete without some description of what has transpired. While greatly oversimplified, the Department hopes this overview gives the reader a basic explanation of what has happened and some of the causes.

The terrorist attacks on September 11, 2001 occurred at a time when the U.S. markets were trying to recover from the bursting of the dotcom bubble in the late 1990's. To keep the economy moving forward amid fears of another terrorist attack, the Federal Reserve began to dramatically cut interest rates. It was hoped that this would make credit widely available and encourage borrowing, spending and investing. Low interest rates had the intended effect, and one important outgrowth was a boom in the housing market starting in 2002. Record numbers of homes were bought and sold, and home prices increased dramatically. Many mortgages were re-financed during this time allowing homeowners to take out home equity that was now available because of rising home prices.

At the same time, new financial products were being introduced into the market. While the Government National Mortgage Association (Ginnie Mae) had been securitizing and selling asset-backed securities (ABS) or mortgage-backed securities (MBS) for many

years, the securitization of bundles of home mortgages began to expand. Subprime lenders, who participated heavily in the real estate mania, found their loans could be sold to Wall Street, packaged with other loans as MBS, and sold to investors. Another investment product was also created called the collateralized debt obligation (CDO). CDO's were basically a re-packaging of the lower grades of MBS. Many of these securities were able to garner investment grade ratings from the credit rating agencies and thus were attractive to institutional buyers. These MBS and CDO securities were widely purchased by pension funds, hedge funds, commercial banks and other institutional investors.

Wall Street appears to have had an endless demand for mortgage loans at this point. This demand made it very profitable for mortgage originators to make loans. Lending criteria for many originators became lax or non-existent. Potential homeowners, who would never have qualified for a home loan under traditional lending standards, were approved.

By mid-2006, home sales began to slow and home prices stopped rising. The first of the adjustable rate mortgages that borrowers had obtained began to reset (adjust) their rates upward. Borrowers, unable to make their increased payments, started to default.

As borrowers defaulted and foreclosure rates rose, the value of MBS and CDO securities dropped dramatically and in some cases became worthless. Unfortunately, the bad loans had been bundled and re-bundled in the securitization process and it was virtually impossible to tell what the value of any given bundle was. These products became too risky for institutional purchasers and they stopped buying. Without purchasers for their loans, dozens of mortgage lenders closed, filed for bankruptcy or otherwise ceased doing lending.

In normal credit markets, financial institutions borrow and lend hundreds of billions of dollars a day to each other. This money is extended as credit to consumers and businesses to keep the U.S. economy going. However, financial institutions became wary of lending to each other because it was impossible to tell how large an exposure each had to the toxic MBS and CDO securities. This resulted in a "credit crisis". A number of economists

say the biggest problem with a credit crisis is that the fear that starts in one place will spread quickly to other areas, even those that do not have fundamental problems. A credit crisis requires fast intervention to forestall further panic and damage.

In September 2007, the Federal Reserve made the first of seven interest rate cuts to address the credit crisis. In an unprecedented move, the Federal Reserve also agreed to start loaning money directly to Wall Street firms and to accept MBS as collateral.

The subprime holdings of large institutions also began to create problems. Ultimately, two Bear Stearns hedge funds closed after large subprime losses, and created losses for Wall Street firms that had lent to them. Seemingly like dominoes, October 2007 saw the first of announcement after announcement of huge subprime related losses from UBS, Merrill Lynch, Citigroup and others.

In March 2008, Bear Stearns collapsed and was taken over by JP Morgan. At the time, Bear Stearns was the fifth largest investment bank in the U.S. Institutions around the world continued to report huge losses. In September 2008, the Federal National Mortgage Association (Fannie Mae) and the Federal Home Loan Mortgage Corp. (Freddie Mac) were placed into conservatorship by the U.S. Treasury. A week later, Lehman Brothers filed for bankruptcy, and Bank of America agreed to buy Merrill Lynch. On September 16, 2008, AIG Corp., the world's largest insurer, received a bailout from the U.S. Federal Reserve. On September 25, 2008, Washington Mutual, Inc. was purchased by JP Morgan. As financial firms failed, the stock market plummeted.

In October, 2008 Congress passed a \$700 billion "rescue" plan designed in large part to remove the bad mortgage assets from the books of financial companies. President Bush immediately signed the bill into law. Around the world banks continued to lose value and governments and central banks scrambled to stem the damage.

Market conditions deteriorated into November, and in December, the National Bureau of Economic Research, Inc. announced that the U.S. had entered a recession in December 2007. On December 16, 2008, the U.S. Federal Reserve Board lowered the target range for the federal funds rate--its benchmark interest rate for short-term interest rates to zero

to 0.25 percent. This is the first time on record that the rate has been cut to near zero. The Federal Reserve stated: “The Federal Reserve will employ all available tools to promote the resumption of sustainable economic growth”.

As 2008 comes to an end, the financial crisis will remain a priority for the incoming Obama administration and his economic team.

Legislation and Rulemaking – Several pieces of legislation sponsored by the Department were enacted during the 2008 Idaho legislature. Amendments to the *Idaho Escrow Act* to include consumer restitution as a remedy that can be sought by the Department in an action to enforce the provisions of that law;

- Amendments to the *Idaho Residential Mortgage Practices Act* to (1) enable the Director to adopt pre-license testing requirements by rule, (2) clarify that mortgage brokering/lending and loan origination activities include engaging in such activities in the expectation of compensation or gain, and (3) clarify that the law applies to loans secured by 1-4 family unit dwellings regardless of occupancy;
- Amendments to the *Idaho Credit Code* to add an exemption from licensure for companies engaging in retail mortgage lending which are already licensed under the *Idaho Residential Mortgage Practices Act* thereby removing a dual licensing requirement. The ICC was also amended to remove a limitation on a consumer finance company from relocating more than five miles from its initial licensed location; and,
- Amendments to the *Idaho Collection Agency Act* to (1) establish uniformity in licensing requirements for collection agencies operating in Idaho regardless of whether the companies have offices inside or outside of the state, (2) eliminate an in-state office requirement and to replace a testing requirement with an experience requirement for office managers, (3) add a definition of credit repair organizations, which were currently required to be licensed under the law, and to implement associated requirements and restrictions on the practices of such companies, and (4)

repeal requirements that credit and debt counselors maintain a status as a non-profit 501(c)(3) organization for the purpose of obtaining a license.

During the fiscal year the Department adopted temporary rulemaking to implement the required use of the NMLS by licensed mortgage brokers/lenders and loan originators, as well as new license applicants. During the 2008 Idaho Legislature, the House Business Committee and the Senate Commerce and Human Resources Committee moved to allow the Department's temporary rule to remain effective contingent on the adoption of a permanent rule in 2009. The rule also updated references to dates in order to make Idaho law uniform with the federal Truth-In-Lending Act and the Real Estate Settlement Procedures Act.

Other statutory amendments included changes to the Idaho Uniform Securities Act, and updating language and amendments to the Idaho Bank Act repealing an outdated provision relating to certain branching and reserve requirements, and amending the law to allow banks to purchase and hold their own stock for certain business purposes.

Two other pieces of legislation were enacted that affect consumers of financial services in Idaho. The Credit Report Protection Act, sponsored by Idaho financial service industries, allows Idaho residents to place a freeze on their credit reports. The Consumer Foreclosure Protection Act was enacted to address foreclosure rescue scams in which innocent homeowners facing foreclosure are defrauded of their title, equity interest, or other value in their homes by companies promising to postpone or stop a foreclosure sale.

Electronic Commerce and Technological Adaptation – This year the Department put into action the 2006 Idaho Legislature's authorization for Idaho to participate in the Nationwide Mortgage Licensing System (NMLS). On January 2, 2008, the Department began using the NMLS to facilitate its licensing process. The NMLS is used by state residential mortgage regulators to accept and process national, uniform license applications and renewal forms that have been created by state regulators over the past three years.

Licensees are now able to electronically submit a single record in the system to apply for, amend, renew, and surrender licenses in one or more states. The system manages state licenses for mortgage companies, branches, and individuals. The NMLS was jointly developed by the Conference of State Bank Supervisors (CSBS) and the American Association of Residential Mortgage Regulators (AARMR). As of the date of the publication of this report, 53 state agencies, representing 48 states and territories have committed to use the NMLS for mortgage licensing.

The Department continues its commitment to find ways to streamline regulation while improving internal productivity. The application of new technology, regulatory adaptation, and operational design has allowed the Department to provide appropriate oversight for significantly more entities and individuals. During the fiscal year, the Department recorded and processed more than 158,000 submissions for securities filings, registration/license applications, charter applications and others. Most Idaho registered securities sales agents (now numbering approximately 80,000) have been licensing electronically since the 1980s. Also, the Department continued its participation in a national electronic licensing and filing system for investment advisory firms and their agents. The Department plans to eventually have the capability to accommodate electronic submission capabilities for each industry overseen by the Department. The Department's current web address is **finance.idaho.gov**.

This year the Department created a new financial literacy webpage where visitors are able to view a schedule of events for Financial Literacy Month, and many other helpful financial education links, materials, and curriculum for presentations.

REGULATORY AND EDUCATIONAL INITIATIVES

Significant changes in the regulatory and competitive structures of the financial services industry continue to occur. These changes require adaptation by both industry and regulators. In this regard, the Department and its staff have engaged in several activities associated with improving regulation and reducing regulatory burdens, while also expanding educational opportunities for both industry and consumers.

Individual Development Account (IDA) Advisory Board – The Idaho IDA Program is an asset-building program that helps qualified low-income applicants purchase a home, go to school, or start a business. With matching funds saved in these accounts from various sources, IDAs promote self-sufficiency and build personal assets that help low-income individuals and families move out of poverty. The Director of the Department of Finance serves on the Idaho IDA Advisory Board.

Regulatory Burdens and Related Costs – The Department continues its commitment to provide reasonable regulatory oversight without imposing excessive costs on industry. Idaho’s overall regulatory fees are among the lowest of any state in the country. Moreover, annual assessments charged to banks and credit unions have been discounted from the statutory maximum amounts for the thirteenth year in a row. This discount has resulted in significant savings for state-chartered financial institutions.

In addition to reducing fees, the Department is implementing ways to reduce other regulatory burdens without reducing the effectiveness of its regulatory oversight. For example, the Department continues to explore ways to direct its examination resources more effectively by reducing the number of staff hours spent in institutions that are healthy and that routinely gain high marks for financial and operational integrity.

Small Business Capital Formation Efforts – The Department continues to participate with more than a dozen state and federal agencies in Small Business Information Fairs held throughout the state. The fairs are a one-stop source of information for persons interested in starting a small business. At these events, the Department presents

information about financing options for small businesses in addition to providing assistance in understanding and complying with the various laws the Department administers.

Industry Educational Efforts – The Department continues its efforts to assist industry in understanding and complying with regulatory requirements. During the course of each year, members of the Department’s staff make presentations before various local industry groups. In many cases, the Department delivers information on current industry compliance issues, as well as helping industry to better understand how the Department operates. Often, these presentations result in an opportunity for industry participants to have specific issues and concerns addressed in an informal discussion setting. The Department’s Consumer Finance Bureau publishes a bi-annual industry newsletter entitled “*The Idaho Compliance Connection*” as a tool to inform collection agencies, mortgage brokers, mortgage lenders, mortgage originators, regulated lenders, escrow agencies, and payday lenders about statutory and regulatory requirements and changes.

Throughout the year the Department provides educational opportunities for industry participants. Among such programs presented this year were:

- The Department conducted mortgage licensee training seminars in Boise, Twin Falls, Idaho Falls, Pocatello and Coeur d’Alene for nearly 415 participants covering mortgage fraud trends, preparing for compliance examinations, and the Nationwide Mortgage Licensing System (NMLS). Continuing education credits were offered to loan originators who attended the trainings.
- The Department Director and Consumer Finance Senior Examiner made presentations to the annual meeting of the Idaho Financial Services Association.
- Consumer Finance Bureau staff made educational presentations during the 2007 Annual Conference of the Idaho Association of Mortgage Brokers.
- The Department co-sponsored and gave presentations at AARP’s Predatory Lending Conference. The Conference offered mortgage industry training to attorneys, real estate agents, and insurance agents and provided continuing education credits to mortgage loan originators.

The Department was a major contributor to the production of the industry focused training DVD, “*Mortgage Fraud, Even in Idaho*”. The DVD was developed to provide training and fraud awareness to mortgage and real estate professionals. The production was completed in cooperation with the Idaho Real Estate Commission, the Idaho Association of Mortgage Brokers, the Idaho Association of Mortgage Lenders, the Idaho Association of REALTORS[®], and others. The DVD won the 2008 Communications Award from the Association of Real Estate License Law Officials (ARELLO).

Consumer Educational Efforts – The Department has a long tradition of providing educational resources to Idahoans. The Department maintains an active “speakers bureau” and provides educational presentation materials on a variety of topics including investment fraud and consumer credit issues.

On the national level, this year President Bush signed an executive order to establish the President’s Advisory Council on Financial Literacy. The 15-member group is being led by Charles R. Schwab, the chairman and chief executive officer of Charles Schwab Corp., and John Bryant, the chairman and chief executive officer of Operation Hope will be its vice chairman. In a White House ceremony, the President said he was looking for recommendations on how to better educate people about their finances. Citing the number of individuals facing difficulties with subprime mortgages makes one wonder how many knew what they were getting into. “One of the missions is to make sure that when somebody gets a financial instrument, they know what they’re getting into, they know what they’re buying, they understand.” Industry representatives recommend that this new Advisory Council to review the “National Strategy for Financial Literacy”, published in 2006 by the Financial Literacy and Education Commission which represented 20 governmental agencies, including the Department of Labor, the Social Security Administration and the SEC. Led by the Treasury Department, that commission was created in 2003 by the Fair and Accurate Credit Transaction Act and covers everything from homeownership to retirement savings to the unbanked.

This year staff presentations included those at Boise State University through the University 101 classes, The National Association of Retired Federal Workers, the Idaho State Treasurer's Smart Women, Smart Money Conference, the Family, Career and Community Leaders of America (FCCLA) conference, teacher conferences, AARP's Fraud Conference, the Idaho Paralegal Society, and others. The Department also co-sponsored with the Idaho Financial Literacy Coalition conferences called "Your Money Matters". The Department also joined with other members of the Idaho Financial Literacy Coalition and the Kootenai County Financial Literacy Task Force during Financial Literacy Month in April 2008.

The Department continued its partnership with the Idaho Council on Economic Education (ICEE) during the fiscal year. ICEE and the Department sponsor the "Stock Market Game" and other financial education programs. The Department participated in workshops sponsored by ICEE to educate teachers about securities fraud, financial literacy and other financial educational opportunities in conjunction with ICEE. The Department also participated in the ICEE's International Economic Summit in Boise. This Summit is geared toward junior and senior high school students in the Boise, Meridian, and Eagle school districts. During the Summit, students are divided into teams representing various countries throughout the world. The teams compete as "economic advisers" and work to better their country's economic situation as well as improve the world as a whole. Several students and teachers from China also participated in this event. About 500 students participated in this year's event. The Department also participated in the ICEE's International Economic Summit held in Nampa at Northwest Nazarene University later in the year.

Financial Literacy Month 2008 – Joining state securities regulators and a broad-based coalition of consumer groups and industry members, including the Idaho Financial Literacy Coalition, the Department participated in the tenth annual Financial Literacy Month during the month of April. On March 27, 2008, Governor C.L. "Butch" Otter signed a proclamation declaring April to be "Financial Literacy Month" in Idaho. This year the events that occurred during financial literacy month included presentations on

financial topics to the National Association of Retired Federal Workers, students at Life's Kitchen in Boise, Easter Seals/Goodwill in Nampa, Boise State University, high school classes, the North Idaho Chapter of the Idaho Credit Union League in Post Falls, Idaho, and a brown bag lunch at the Coeur d'Alene library.

Other events during the month included: The Bank of Commerce of Idaho Falls taught financial life skills through a program called "Welcome to the Real World" at Lincoln Alternative High School; the National Financial Education Center (NFEC) presented "Preventing and Eliminating Debt" and "Personal and Household Budgeting" at their office in Boise and at St. Michael's in Boise, "Using Credit Wisely" and "Developing Effective Spending Behaviors" at Easter Seals/Goodwill in Nampa and "Preventing Debt" to Middleton Middle School; the Idaho Financial Literacy Coalition (IFLC) sponsored the conference "Your Money Matters" at the Nampa Civic Center; IFLC members Zions Bank and Syringa Bank sent volunteers to schools throughout Idaho as part of Teach Children to Save Day; the Department conducted a workshop regarding "Credit Reports and Credit Scoring"; the Kootenai County Financial Literacy Task Force sponsored "Financial Literacy Week" which included presentations to various Kootenai County high schools concerning credit card use and credit scoring.

Idaho Financial Literacy Coalition – The Department remained actively involved in the Idaho Financial Literacy Coalition (IFLC) again this year. The IFLC is comprised of a broad array of individuals from government, education, segments of the financial services industry, and for-profit and non-profit groups. The mission of the IFLC is to improve the quantity and quality of information and educational programs related to personal finance by providing resources and instruction to educators, youth leaders, and others in need of assistance or at financial risk.

Industry and Regulatory Cooperation and Coordination – The Department makes significant efforts to coordinate its activities with both industry and other regulatory agencies. Such coordination and cooperation is increasingly important in an interstate, international and electronic commercial world. The Department meets regularly with industry trade associations and other state and federal regulators. The Department has also continued to work closely with CSBS and AARMR on the Nationwide Mortgage Licensing System (NMLS).

Securities Investor Education Fund – The Department continues to stress the overall importance of financial literacy among Idahoans as a means to reduce the number of fraud victims and other investment related complaints. The Securities Investor Education Fund, established as part of the Idaho Uniform Securities Act, provides a source of funding for securities investor education and training. Since September 1, 2004, monies received as part of civil penalties and administrative fines have been used to establish a fund (up to \$50,000 per year) for the education of Idaho investors.

INDUSTRY RESULTS IN IDAHO

Banking in Idaho – Total deposits in Idaho decreased slightly over the prior period. However, Idaho state-chartered banks reported an increase in total deposits of \$229 million or 5.8 percent over calendar year 2007. Idaho state-chartered banks also increased total assets to \$5.5 billion, an 11.6 percent increase.

Credit Unions in Idaho – Idaho state-chartered credit unions continued to experience growth in both assets and deposits over the past calendar year. Total assets of state-chartered credit unions increased by \$142.9 million or 9.02 percent, and total aggregate net worth increased by \$19.3 million to \$161.8 million. Idaho-based credit unions also experienced strong growth in shares (deposits) to \$1,540 million, an increase of 8.61 percent.

Consumer Finance – Conditions in the mortgage market have had an impact on licensed entities doing business in Idaho, as well as on consumers seeking credit. Although this has led to a reduction in the overall number of mortgage related licensees, the Department continues to receive a steady number of mortgage broker/lender and loan originator license applications. This year, the Department had regulatory oversight responsibility for 511 licensed regulated lender and title lender office locations, 232 licensed payday lender office locations, 1,408 licensed mortgage broker/lender office locations, 3,392 individual mortgage loan originator licensees, and 39 licensed escrow agency locations. In addition, the Consumer Finance Bureau had regulatory oversight responsibility for 194 Idaho-based licensed collection agency office locations and 491 out-of-state collection agency office locations. The number of collection agency solicitors/collectors registered in Idaho was 60,536 at fiscal year end.

Securities – The Securities Bureau processed more than 91,000 submissions in fiscal year 2008, up 5.7% from the prior year. The Bureau's oversight also extends to more than 80,000 individuals who currently hold Idaho registrations as broker-dealer agents, investment adviser representatives and issuer agents. This represents a 5.95% increase over the prior fiscal year. Through civil and administrative sanctions, the Bureau obtained orders for approximately \$3.2

million in rescission for Idaho investors. The potential financial impact of securities cases under investigation during the fiscal year exceeds \$106 million.¹

¹ During the fiscal year, the Department undertook an investigation of a seller of auction rate securities. The financial impact of that case alone was approximately \$75 million.

¹ During the fiscal year, the Department undertook an investigation of a seller of auction rate securities. The financial impact of that case alone was approximately \$75 million.

FINANCIAL INSTITUTIONS BUREAU

Idaho Bank Act
Idaho Bank Holding Company Act
Idaho Financial Fraud Prevention Act
Idaho International Banking Act
Idaho Interstate Banking Act
Idaho Interstate Branching Act
Idaho Trust Institutions Act
Idaho Savings Bank Act
Business and Industrial Development Corporation Act
Idaho Credit Union Act

The Financial Institutions Bureau is responsible for promoting the safety and soundness of state-chartered commercial banks, savings banks, credit unions, bank holding companies, trust companies, and business and industrial development corporations operating in Idaho. The Bureau ensures that these institutions are operating safely and soundly, that the public can have confidence in the financial system, and that the interests of depositors, creditors and shareholders are protected. The Bureau is responsible for enforcement of the Idaho Bank Act, Idaho Bank Holding Company Act, Idaho Financial Fraud Prevention Act, Idaho Interstate Branching Act, Idaho Interstate Banking Act, Idaho International Banking Act, Idaho Savings Bank Act, Idaho Trust Institutions Act, Idaho Credit Union Act, and the Business and Industrial Development Corporation Act. The Bureau supervises state-chartered institutions by providing high-quality supervision directed at identifying material problems, or emerging problems, in individual institutions or the financial service industry, and ensuring that such problems are appropriately corrected. The Bureau monitors and evaluates the financial health of state-chartered institutions, along with the various risks facing these institutions, through the on-site regulatory examination process and off-site monitoring program. The Bureau also investigates complaints against state-chartered financial institutions filed with the Department.

The Bureau works closely with federal and other state regulators to provide our industries seamless supervision, minimize disruption and costs, and effectively utilize resources. Teams for examinations normally include both state and federal examiners. We support the "single point of contact" process for state-chartered institutions operating on a multi-state basis.

The Bureau is strongly committed to providing effective regulation without excessive costs. Our fees remain among the lowest in the nation. We have discounted the annual bank assessments

since 1987. This results in significant savings for state-chartered banks. We do not charge examination fees and process most applications for nominal, or no fees. Idaho financial institutions incur significantly less in regulatory costs than their federal counterparts.

Recent challenges in the state and national economies have impacted our citizens and the institutions we regulate. We are responding through the prudent and efficient oversight of financial institutions, by the administration of laws enacted by the Idaho Legislature, and by applying appropriate enforcement actions where necessary.

National Accreditation

The Conference of State Bank Supervisors (CSBS) and the National Association of State Credit Union Supervisors (NASCUS) have established accreditation standards for both bank and credit union supervision and regulation. The accreditation process requires a comprehensive review of all factors needed to have a fully functional regulatory organization. The bank and credit union sections were initially accredited in 1990. Every year the accreditation committee requires updated information to maintain accredited status; a full-scale re-accreditation occurs every five years and was last renewed in 2005. The Department's banking and credit union programs have been accredited by CSBS and NASCUS continuously since 1990, contributing to the Department's ranking among the top banking departments in the country.

Education and Examiner Training

Continuing education and training continue to be very important elements to maintaining accreditation, as well as maintaining confidence and validation with those we regulate. The Department aggressively supports educational opportunities for its examiners. During fiscal year 2008, examiners attended training sessions provided or sponsored by the Federal Deposit Insurance Corporation, the Federal Reserve System, the Conference of State Bank Supervisors, and the Pacific Coast Banking School. The ten examiners assigned the banking section attended 20 weeks of off-site training during the fiscal year.

BANKING SECTION

The Banking Section is charged with the responsibility of supervising Idaho's state-chartered commercial banks, savings banks, and bank holding companies to ensure safe and prudent banking practices for the benefit of depositors and shareholders, to maintain public confidence in the banking system, to promote fair competition, and to encourage the continuation, maintenance, and preservation of the dual banking system. The Banking Section also licenses and supervises financial institution trust departments, and business and industrial development corporations (BIDCOs).

As of June 30, 2008, there were seven bank holding companies, fifteen commercial banks (three with trust powers), and one BIDCO under the Banking Section's direct supervision. The Banking Section also has regulatory oversight responsibilities, as the host state supervisor, for eight state-chartered banks operating in Idaho and chartered by other states. As of June 30, 2008, these institutions held \$2.1 billion of Idaho deposits and operated 74 offices throughout the state. AmericanWest Bank (10 branches), Banner Bank (8 branches), Inland Northwest Bank (4 branches), Sterling Savings Bank (18 branches), and Washington Trust Bank (12 branches) are chartered by the State of Washington; Bank of the West (7 branches) is chartered by the State of California; Bank of the Cascades (14 branches) is chartered by the State of Oregon; and Lewiston State Bank (one branch) is chartered by the State of Utah. As a host state supervisor, the Banking Section also has indirect supervision over ten out-of-state bank or financial holding companies with banking operations in Idaho.

In fiscal year 2008, the Banking Section completed fourteen risk management examinations, five consumer compliance examinations, and two trust examinations. The Banking Section also performed fourteen information technology examinations and fourteen Bank Secrecy Act examinations in conjunction with the risk management examinations, participated on one new bank field investigation and two bank visitations, and participated in one coordinated supervisory review of an out-of-state bank holding company.

Proposed Legislation and Regulation

Although not enacted into law or implemented during the fiscal year, important legislation and regulations were being considered with wide-ranging implications for the banking system as of the preparation of this report. These pertain to the serious financial challenges facing the economy and the country's financial systems.

The Federal Emergency Economic Stabilization Act of 2008 has a stated purpose to provide authority to the Treasury Secretary to restore liquidity and stability to the U.S. financial system and to ensure the economic well-being of Americans. The Act contains several major provisions directly pertinent to banking, including the following:

- Troubled Asset Relief Program (TARP) - The Program was initially proposed to purchase troubled assets from financial institutions. As implemented, this Program will allow the Federal government to make direct equity investments in banks.
- Troubled Assets Guarantee – If the Secretary establishes the TARP program, the Secretary would also be required to establish a program to guarantee troubled assets of financial institutions.
- Temporary Increase in Deposit and Share Insurance Coverage – The FDIC and the National Credit Union Share Insurance Fund deposit insurance limits were raised from \$100,000 per account to \$250,000 until December 31, 2009. The borrowing limits at the Treasury for the FDIC and the National Credit Union Share Insurance Fund were also temporarily raised.

The Federal Deposit Insurance Corporation announced in October 2008 a Temporary Liquidity Guarantee Program (TLGP) that would guarantee newly issued senior unsecured debt of banks, thrifts, and certain holding companies, and provide full coverage of non-interest bearing deposit transaction accounts. The FDIC is relying on the systemic risk exception provided for in the Federal Deposit Insurance Corporation Improvement Act of 1991 (FDICIA) to establish this program. This provision allows the FDIC to step outside a least cost resolution and to use broader authorities or flexibility in addressing problems in the banking industry.

IDAHO BANKING INDUSTRY REVIEW

Performance and Condition of Idaho Financial Institutions

As of June 30, 2008, there were 20 financial institutions (15 state-chartered banks, 2 national banks, and 3 federal thrifts) based in Idaho with combined assets of \$7.8 billion, loans and leases of \$6 billion and deposits of \$5.7 billion². Idaho based financial institutions continue to outperform the nation and reported higher profitability, higher levels of capital, and stronger asset quality than all institutions in the nation as of the second quarter of 2008. Return on assets of Idaho institutions was 0.93 percent as of June 30, 2008, compared to 0.37 percent for institutions nationwide, Idaho's core capital ratio was stronger at 11.39 percent versus 7.89 percent for the nation, and the percentage of Idaho's noncurrent loans to total loans was 0.91 percent, well below the 2.04 percent for the nation. Idaho institutions reported net charge-offs of 0.28 percent compared favorably to 0.70 percent for the nation.

Idaho economic growth has slowed and payrolls have recently declined – especially in construction-related industries. This will continue to affect the financial institutions' performance. Manufacturing and services sectors have also weakened. Although the high-tech sector remains important, it has also been impacted. Layoffs at Micron Technology, the state's largest private employer, and the acquisition of American Microsystems by an out-of-state company will inhibit this sector's ability to add to the state's job creation. The housing correction also affects jobs. Related payrolls are expected to continue to decline and price adjustments may prove a limiter to growth.

Although the economy is predicted to weaken and lose jobs, Idaho fundamentals remain positive. Idaho benefits from strong net in-migration, low-cost dependable energy, and low business costs – especially labor. All of this should help Idaho, and Idaho-based institutions, rebound from the housing correction.

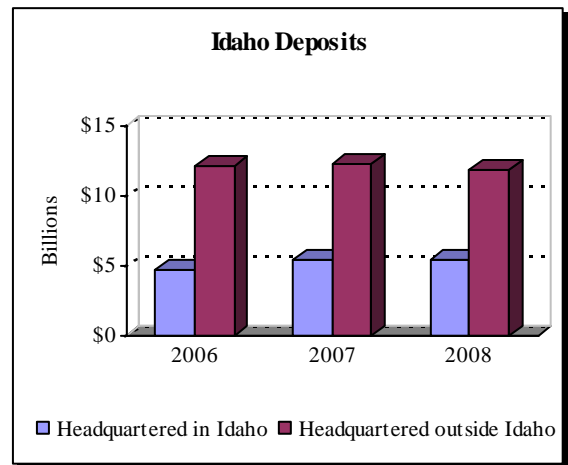
Because of the housing correction and regulatory guidance, Idaho banks have implemented procedures to monitor their exposures to real estate lending. Risk management examinations have disclosed generally robust real estate lending policies and forward-looking risk management practices.

² Source: FDIC Statistics on Depository Institutions

Idaho Deposits Decline Slightly – Idaho-Based Institutions Gain Market Share

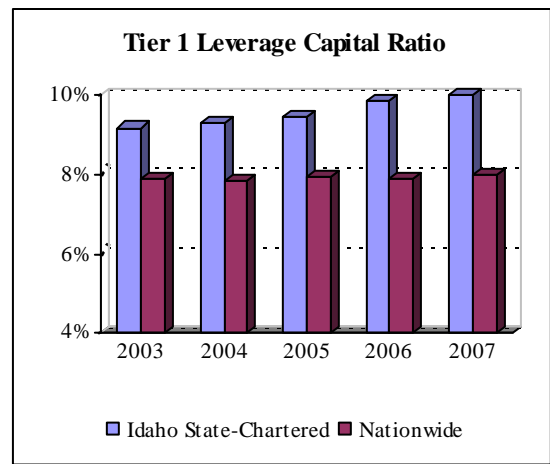
As of June 30, 2008, there were 37 commercial banks and savings institutions operating 541 offices competing for deposits in Idaho, compared to 36 institutions with 522 offices reported as of June 30, 2007. Institutions headquartered outside of Idaho continue to hold a large percentage of Idaho deposits (68.9 percent), but the 20 institutions based in Idaho continue to gain market share and hold 31.1 percent of Idaho deposits, up from 30.4 percent of the market share last year.

Total deposits in Idaho decreased slightly, 2.6 percent during the year, to \$17.2 billion as of June 30, 2008. Deposits of institutions based in Idaho remained virtually unchanged, while institutions based outside Idaho fell 3.6 percent to \$11.9 billion. Over the past ten years, deposits in Idaho have grown 72.1 percent from \$10 billion to \$17.2 billion. This year marked the first decline since 1997.



State-Chartered Banks Increase Capital Levels

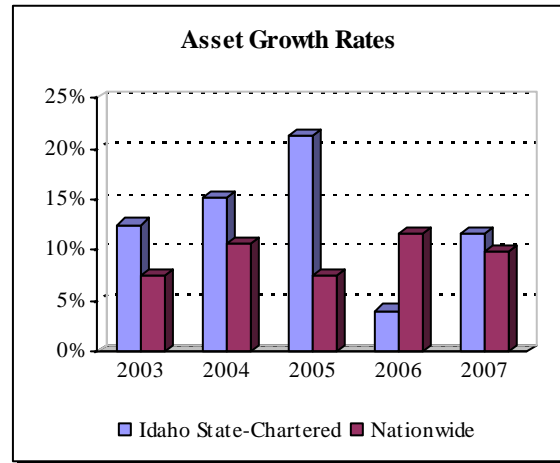
Idaho state-chartered banks reported an increase in the average Tier 1 Leverage Capital ratio to 10.58 percent as of December 31, 2007 from 9.83 percent as of December 31, 2006. This greatly exceeded the 7.97 percent average of all commercial banks in the nation. Total equity capital of state-chartered banks increased 18.9 percent in 2007 from \$525 million to \$624 million. State-chartered banks reported similar



increases in other key capital measurements with the average Tier 1 Risk-Based Capital ratio increasing to 12.21 percent from 11.49 percent and the average Total Risk-Based Capital ratio increasing to 13.39 percent from 12.67 percent, comparing favorably to the national average of all commercial banks of 10.11 percent and 12.78 percent, respectively.

Idaho Banks Reported Higher Growth for 2007

Idaho state-chartered banks reported total assets of \$5.5 billion as of December 31, 2007, an 11.6 percent increase from \$5.0 billion on December 31, 2006. This resumes a multi-year trend in which Idaho state-chartered institutions experienced higher asset growth rates than banks nationwide. The disparity in 2006 was due to the acquisition of an Idaho state-chartered institution by an out-of-state bank.

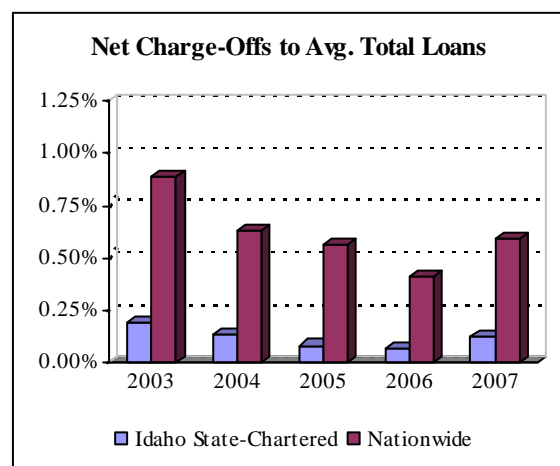


Net loans and leases held by Idaho state-chartered banks totaled \$4.2 billion as of December 31, 2007, an increase of \$538 million or 14.6 percent from \$3.7 billion as of December 31, 2006, well above the 9.1 percent reported by all commercial banks in the nation. Loans increased in all categories except for loans to individuals, which declined \$22.3 million, or 13.7 percent.

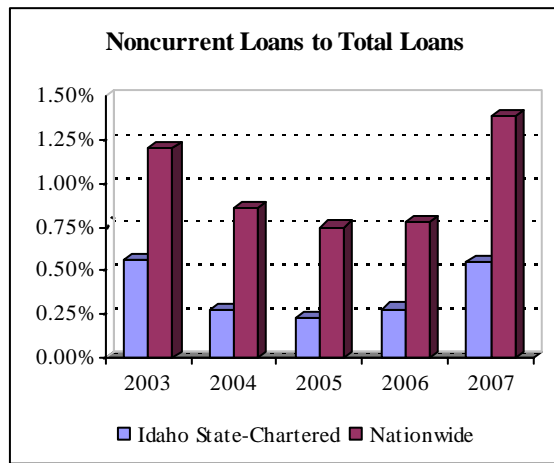
Idaho state-chartered banks reported \$4.2 billion in total deposits as of December 31, 2007, an increase of \$229 million or 5.8 percent from \$4.0 billion as of December 31, 2006. The growth rate was well above the 2.9 percent growth rate in 2006. As with the asset growth rate, that smaller growth rate is attributed to the Idaho state-chartered bank acquisition that occurred during that fiscal year.

Sound Asset Quality and Earnings

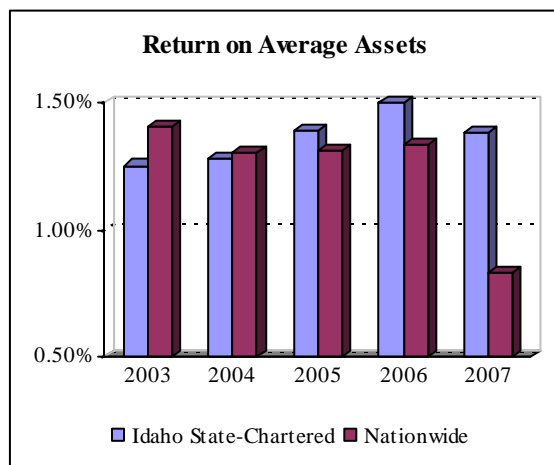
Despite the challenges in the economy, Idaho state-chartered banks continue to report sound asset quality. Net charge-offs to total loans and leases for Idaho state-chartered banks increased slightly to 0.12 percent in 2007, from 0.07 percent in 2006. However, this rate is only about one-fifth the national average of 0.59 percent.



Noncurrent loans to total loans increased to 0.55 percent, but again, is less than half the nationwide rate of 1.39 percent. Idaho state-chartered banks continue to report higher reserves for possible loan losses than for all banks nationwide despite their better loan quality indicators. The allowance for loan and lease losses for Idaho state-chartered banks stood at 1.37 percent of total loans as of December 31, 2007 compared to 1.30 percent for all banks nationwide.



Idaho state-chartered banks reported earnings of \$72.4 million in 2007, a 6.3 percent gain over the earnings of \$68.2 million in 2006. Net interest income increased 9.5 percent during 2007 to \$256.4 million, and noninterest income rose a robust 13.0 percent to \$55.8 million. The factor that had the largest negative impact on Idaho state-chartered banks' profitability was an increase in their total interest expense that resulted



in a decline in their net interest margin. Total interest expense increased 47 basis points to 2.69 percent in 2007 over 2.22 percent in 2006. This outstripped the corresponding increase in total interest income of only 20 basis points. This contraction in the net interest margin flowed through to the return on average assets (ROAA) of Idaho state-chartered banks: In 2006, the ROAA fell 12 basis points from 1.50 percent in 2006, to 1.38 percent in 2007. Despite this decline, Idaho state-chartered institutions outperformed banks nationwide. The ROAA for banks nationwide fell 42 basis points from 1.28 percent in 2006, to 0.81 percent in 2007. The difference in changes to the provision for loan and lease losses expense was the primary cause of this variance. Continued strong asset quality allowed Idaho state-chartered institutions to decrease these expenses three basis points as a percent of average assets. Nationwide banks had to increase these expenses 30 basis points to cope with their developing asset quality issues.

**Commercial Banks Based in Idaho
Aggregate Condition and Performance**

Idaho Banks	06/30/2008	06/30/2007	\$/# Change	% Change	12/31/2007	12/31/2006	\$/# Change	% Change
<i>(dollar figures in millions)</i>								
Number of institutions reporting	17	16	1	6%	16	14	2	14%
Total employees (full-time equivalent)	2,155	2,060	302	15%	2,097	1,826	271	15%
AGGREGATE CONDITION AND INCOME DATA								
Net income (year-to-date)	28	38	-10	-26%	78	68	10	15%
Total assets	6,165	5,699	466	8%	5,997	4,951	1046	21%
Earning assets	5,637	5,229	408	8%	5,508	4,524	984	22%
Total loans & leases	4,799	4,339	460	11%	4,582	3,728	854	23%
Other real estate owned	21	2	19	950%	3	1	2	200%
Total deposits	4,565	4,555	10	0%	4,598	3,973	625	16%
Equity capital	750	669	81	12%	696	519	177	34%
PERFORMANCE RATIOS (YTD, %)								
			BP Change				BP Change	
Yield on earning assets	7.03	8.16	-113		8.19	8.11	8	
Cost of funding earning assets	2.29	2.88	-59		2.91	2.44	47	
Net interest margin	4.73	5.28	-55		5.28	5.67	-39	
Noninterest income to avg. earning	1.13	1.16	-3		1.15	1.19	-4	
Noninterest expense to avg. earning	3.9	3.9	0		3.91	3.99	-8	
Net charge-offs to loans & leases	0.34	0.1	24		0.11	0.07	4	
Credit-loss provision to net charge-	168.85	297.53	-129		263.25	497.66	-234.41	
Net operating income to average	0.87	1.38	-51		1.38	1.52	-14	
Retained earnings to average equity	6.8	11.33	-453		6.55	12.4	-585	
Pre tax return on assets	1.45	2.11	-66		2.09	2.33	-24	
Return on assets	0.94	1.38	-44		1.38	1.5	-12	
Return on equity	7.68	11.89	-421		11.82	14.17	-235	
CONDITION RATIOS (%)								
Net loans and leases to assets	76.75	75.13	162		75.37	74.25	112	
Loss allowance to:								
Loans and leases	1.39	1.32	7		1.34	1.38	-4	
Noncurrent loans and leases	147.28	673.51	-526.23		241.85	488.1	-246.25	
Noncurrent loans & leases to								
total loans & leases	0.95	0.2	75		0.56	0.28	28	
Nonperforming assets to assets	1.07	0.18	89		0.47	0.24	23	
Core deposits to total liabilities	69.10	75.81	-671		71.93	73.13	-120	
Equity capital to total assets	8.12	11.74	-362		8.18	10.47	-229	
Core capital (leverage) ratio	8.01	11.43	-342		8.19	9.83	-164	
Total capital to risk-weighted assets	10.8	14.23	-343		10.72	12.67	-195	
Gross 1-4 family mortgages to gross	11.85	9.99	186		10.57	9.9	67	
Gross real estate assets to gross assets	53.34	55.43	-209		51.73	54.8	-307	

Department Issued New Bank Charter during Fiscal Year 2008

Western Capital Bank commenced banking operations at 1750 Front Street, Boise, Idaho on March 31, 2008, after the Department granted final approval for the state charter. The bank was capitalized with \$35 million raised through a private stock offering – a record amount of initial capital for a new state bank in Idaho. Western Capital Bank is a wholly owned subsidiary of

Western Capital Corporation, a newly formed Idaho bank holding company that owns 100 percent of the common stock of Western Capital Bank.

Branch and Relocation Application Activity

Branch expansion among community banks continued in fiscal year 2008, providing additional choices for Idaho consumers. The following branches were approved and/or opened in fiscal year 2008:

Branch Applications					
Institution	New Branch Location	City	State	Approved	Opened
Idaho State-Chartered Institutions					
The Bank of Commerce	859 S. Yellowstone	Rexburg	ID	07/13/2007	Pending
Mountain West Bank	1319 Highway 2	Sandpoint	ID	08/13/2007	09/02/2008
D. L. Evans Bank	213 N. 9 th Street	Boise	ID	01/14/2008	06/23/2008
Mountain West Bank	6351 N. Landmark Drive	Park City	UT	01/23/2008	Pending
Syringa Bank	1005 Bryden	Lewiston	ID	03/24/2008	06/02/2008
Other State-Chartered Institutions					
Banner Bank	600 Sun Valley Road	Nampa	ID		10/25/2007
Bank of the West	801 South Vista Avenue	Eagle	ID		10/29/2007
Inland Northwest Bank	950 W Bannock Street	Coeur d'Alene	ID		11/15/2007
Inland Northwest Bank	746 North College Road	Spirit Lake	ID		12/17/2007
Washington Trust Bank	1595 S. Eagle Road	Meridian	ID		01/07/2008
Bank of the Cascades	1550 South Kimball Way	Eagle	ID		01/23/2008
Bank of the West	827 W. Idaho	Meridian	ID		05/15/2008

TRUST DEPARTMENTS AND TRUST COMPANIES

The Banking Section is responsible for enforcing the *Idaho Trust Institutions Act* and currently supervises the trust departments of three state-chartered banks. These trust departments primarily administer personal trusts, agency accounts, safekeeping, and non-complex employee benefit accounts. The employee benefit accounts are mostly self-directed IRAs and 401(k) accounts.

Total trust assets under supervision increased by 37.08 percent during the year to \$224.6 million as of December 31, 2007, consisting of \$130.6 million in managed assets, and \$94 million in non-managed assets.

The Department has approved two out-of-state trust companies to operate in Idaho. These companies—Morgan Chase Trust Company (Sioux Falls, South Dakota) and U.S. Trust Company of Delaware (Wilmington, Delaware)—have no offices in Idaho. These out-of-state trust companies are supervised in accordance with the terms of the Nationwide Cooperative Agreement for Supervision and Examination of Multi-State Trust Institutions, with the home state regulator as the single point of contact.

	12/31/2007	12/31/2006	\$/# Change	% Change
Fiduciary powers granted	5	5	0	0.00%
Fiduciary powers exercised	3	3	0	0.00%
Fiduciary or related activity	3	3	0	0.00%
Number of fiduciary and related asset accounts	812	653	159	24.35%
Number of managed accounts	520	365	155	42.47%
Number of non-managed accounts	292	288	4	1.39%
Total fiduciary and related assets (\$)	224,625	163,869	60,756	37.08%
Managed assets (\$)	130,620	79,963	50,657	63.35%
Non-managed assets (\$)	94,005	83,906	10,099	12.04%

BUSINESS AND INDUSTRIAL DEVELOPMENT CORPORATIONS

On July 1, 1989, the Business and Industrial Development Corporation Act became effective, authorizing an alternative form of financial institution. The Act authorizes the formation of business and industrial development corporations (BIDCOs) to provide financing and management assistance to new or expanding companies.

Working closely with the Small Business Administration, other federal financial assistance programs, local economic development organizations, and traditional commercial lenders, BIDCOs are licensed to increase the level and quality of financial services available to the small business community in Idaho. This financial assistance has led to the creation or retention of an estimated 1,283 permanent jobs in the state. The Idaho Company, located in Idaho Falls, is the only licensed BIDCO currently operating in Idaho.

Business and Industrial Development Corporations		
Activity for Calendar Year 2007	Number	Dollar Amount
Number and dollar amount of financing assistance provided to business firms in 2007:	22	\$469,904
Number and dollar amount of financing assistance provided to minority-owned business firms in 2007:	0	0
Estimated number of jobs created or retained through financing assistance in 2007:	320	NA
Activity Since Inception	Number	Dollar Amount
Number and dollar amount of financing assistance provided to business firms:	273	\$25,209,121
Number and dollar amount of financing assistance provided to minority-owned and woman-owned business firms:	23	\$2,009,416
Estimated number of jobs created:	915	NA
Estimated number of jobs retained:	368	NA

CREDIT UNION SECTION

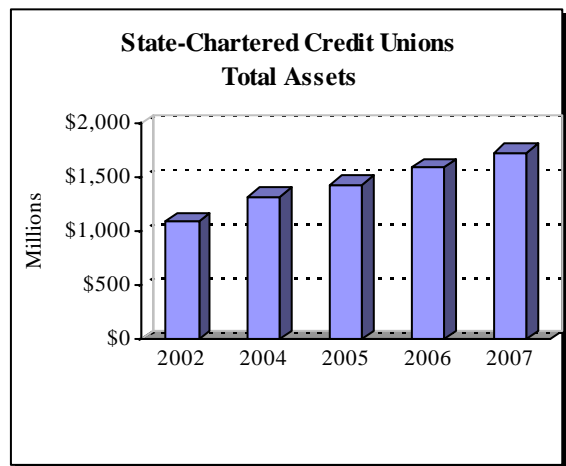
The Credit Union Section is charged with the responsibility of supervising all Idaho state-chartered credit unions and ensuring compliance with the Idaho Credit Union Act and numerous federal regulations. As of June 30, 2008, there were 40 credit unions under the Credit Union Section's direct supervision. The Section has additional responsibilities, as the host-state supervisor, for five state-chartered credit unions operating in Idaho and chartered by other states. Washington-chartered Horizon Credit Union has branches in Coeur d'Alene, Post Falls, Ponderay, and Sandpoint; Numerica Credit Union has branches in Coeur d'Alene and Hayden; Global Credit Union has branches in Moscow, Post Falls, and Coeur d'Alene; and Spokane Teachers Credit Union has branches in Post Falls and Dalton Gardens. California-chartered Silverado Credit Union operates one branch in Nampa.

The Department enjoys an excellent working relationship with other state and federal credit union regulators and a private insurer. The Credit Union Section is an active participant in the National Association of State Credit Union Supervisors (NASCUS). NASCUS actively coordinates with all state credit union regulatory agencies and the National Credit Union Administration (NCUA) on a variety of credit union regulatory issues.

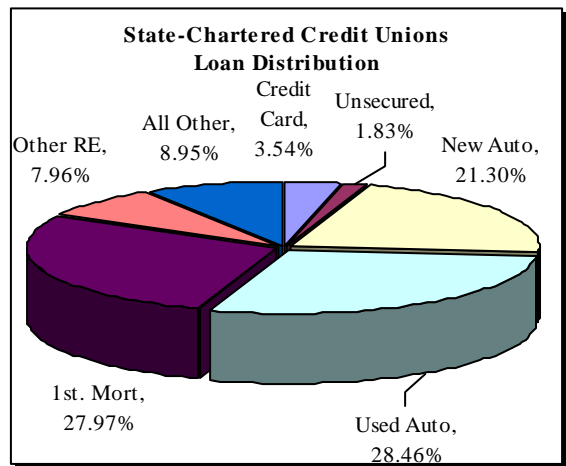
Branching Activity – During fiscal year 2008, five credit unions received approval for new branches. Idaho Central Credit Union received approval and opened a branch in Nampa and also received approval for a branch in Kuna; Westmark Credit Union received approval and opened a branch in Nampa; Idadiv Credit Union was approved for a branch in Meridian; Members Preferred Credit Union was approved for a branch in Idaho Falls; and Idaho Advantage Credit Union was approved for a branch in Nampa.

Performance and Condition of Idaho Credit Unions – The credit union industry as a whole remains healthy, as are the state-chartered credit unions in Idaho, despite current economic conditions. The information used to compile the dollar figures and ratios presented in the following charts and narrative comments is derived from the consolidated Call Reports filed by Idaho’s state-chartered credit unions for the period ending December 31, 2007.

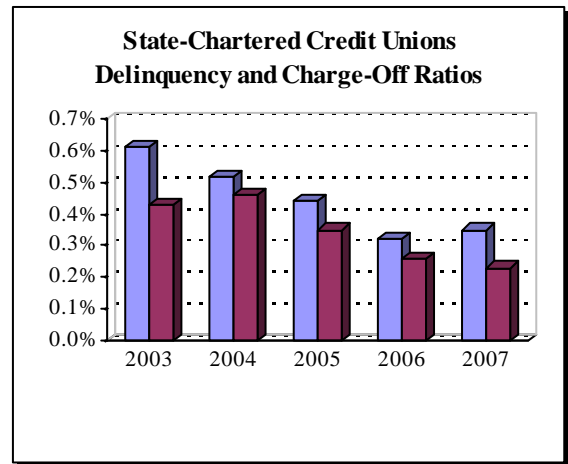
Growth – Idaho state-chartered credit unions continued to grow in 2007. Total Assets grew by \$142.9 million, a rate of 9.02 percent. The growth rate was slightly lower than that in 2006, which was 10.8 percent.



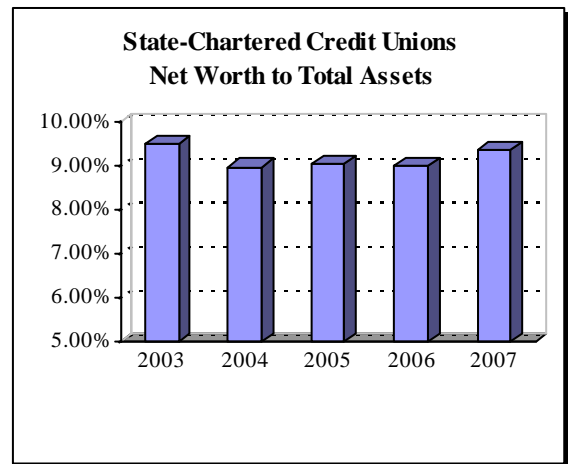
Loan Trends – Loan growth increased in 2007 to 10.87 percent compared to 10.5 percent in 2006. Total loans for state-chartered credit unions are now \$1.302 billion, an increase of nearly \$127.7 million. Loan growth was primarily in the Other Real Estate Loans category, which grew 48.93 percent for a new total of nearly \$103.7 million. This category includes Home Equity Lines of Credit (HELOC) and second mortgages. All Other Unsecured Loans was the second fastest growing segment at 19.98 percent, for a total of nearly \$23.9 million. During the same time period, share growth occurred at a slower rate, 8.61 percent, decreasing liquidity and bringing the loan to share ratio to 84.59 percent from 82.86 percent in 2006.



Delinquency Trends – Loan delinquency increased slightly in 2007 to 0.35 percent of total loans, from 0.32 percent in 2006. The dollar amount of delinquent loans increased to \$4.5 million from \$3.7 million in 2006. The amount of net charge-offs in 2007 was nearly identical to what it was in 2006 at \$2.9 million. The ratio of loans charged off to total loans decreased from 0.26 percent in 2006 to 0.23 percent in 2007.

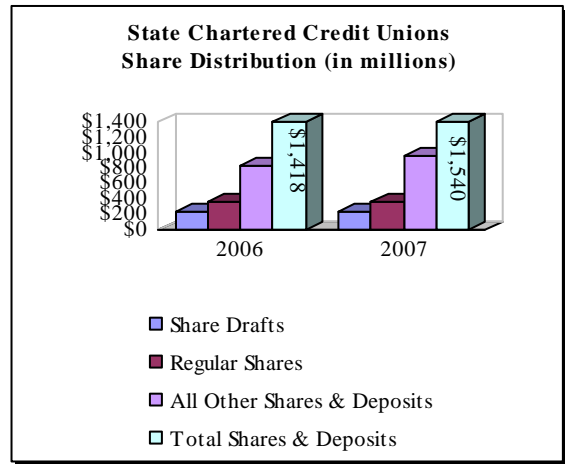


Net Worth – Net worth increased to 9.36 percent from 9.02 percent in 2006. Net worth total dollars increased to \$161.8 million, an increase of \$19.3 million from 2006. The growth of the net worth ratio is sound, as the growth in capital, positive earnings, outpaced the growth in total assets.



Operating Results – Net income for 2007 was \$15.3 million, an increase of \$1.8 million from 2006. Interest income remains the largest source of income for Idaho state-chartered credit unions. The total interest income for 2007 was \$96.1 million compared to \$81.5 million in 2006. Interest on loans accounted for \$82.6 million of the \$96.1 million total. The largest interest expense remains interest paid on deposits at \$33.8 million, or 75.7 percent of total interest expense. The largest non-interest income remains fee income, which increased to \$16.2 million in 2007, up from \$14.2 million in 2006. The largest non-interest expense is employee compensation and benefits at \$34.5 million, an increase of nearly \$4.8 million from 2006. The return on average assets (ROAA) for 2007 was 0.94 percent, an increase of 0.05 percent from 2006. The increase is a result of the rate of increase in total assets being smaller than that for net income.

Share Trends – Total shares increased 8.61 percent, to \$1.540 billion in 2007. Regular shares account for 22.85 percent of total shares, a decrease from 25.6 percent in 2006. The dollar amount in regular shares actually declined in 2007, from \$363.2 million to \$352 million. The total amount of share drafts decreased as well in 2007, from \$229.4 million to \$227.2 million. There was large growth in All Other Shares and Deposits, which includes Certificates of Deposits and IRAs. All Other Shares and Deposits grew 16.41 percent in 2007 to \$960.9 million.



Liquidity Trends – Cash and short-term investments decreased 2.25 percent to \$127.3 million in 2007. The decrease was due to an increase in lending activities and investments by credit unions. Investments increased \$3 million in 2007, or 1.53 percent.

Summary – Overall, state-chartered credit unions in Idaho remain financially strong and operate within their charters and the Idaho Credit Union Act. Credit union managers continue to watch their credit portfolios and economic trends to ensure that the credit crisis that has swept across the country has minimal impact on their institutions. State-chartered credit unions continue to encourage thrift among their members, and ensure that their members have access to credit and basic financial services.

CONSUMER FINANCE BUREAU

Idaho Credit Code
Idaho Collection Agency Act
Idaho Residential Mortgage Practices Act
Idaho Mortgage Company Act
Idaho Escrow Act

The Consumer Finance Bureau is the regulatory and licensing authority for regulated lenders under the *Idaho Credit Code*. Regulated lenders include consumer finance companies, financial institutions, payday lenders, title lenders, and creditors who take assignments and undertake collection of payments from debtors arising from regulated consumer loans. Provisions of the *Idaho Credit Code* also apply to retail sellers of goods and services who extend credit to their customers.

The Bureau is committed to providing reasonable regulation of mortgage brokers, mortgage lenders, mortgage loan originators, and mortgage servicing providers operating in Idaho under the *Idaho Residential Mortgage Practices Act* and the *Idaho Mortgage Company Act*.

The Bureau is responsible for the licensing and enforcement provisions of the *Idaho Collection Agency Act*. Collection agencies that engage in collection activities in Idaho residents are required to have a license under and comply with the provisions of the Act. Entities that engage in credit counseling, debt counseling, and credit repair within the state of Idaho are also required to obtain a license and comply with the provisions of the Act.

The Bureau is responsible for the licensing and enforcement provisions of the *Idaho Escrow Act*, an Act that provides a regulatory framework for independent escrow companies operating in Idaho. The coverage of the Act extends to exchange accommodators who facilitate exchange transactions allowed pursuant to 26 USC §1031.

Compliance with the above laws is accomplished by on-site examinations of licensees, and by investigations of complaints filed with the Bureau. The goal of the Bureau is to assure the availability and quality of consumer finance services, and ethical debt collection practices. The Bureau currently has a 16 member staff.

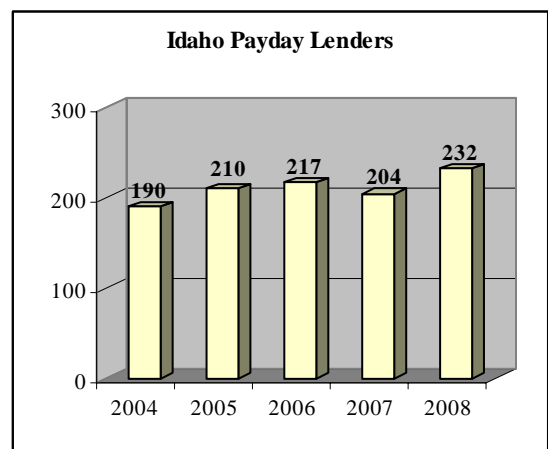
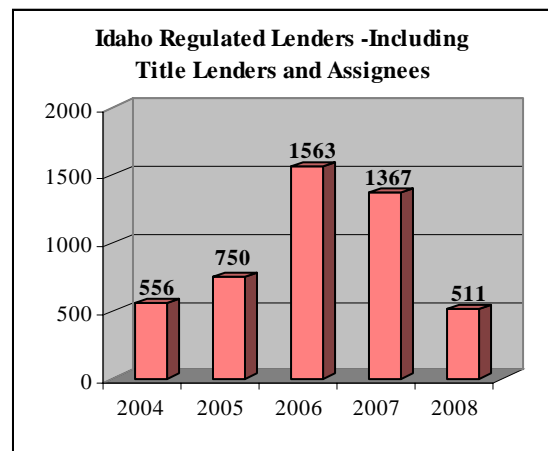
IDAHO CREDIT CODE

The *Idaho Credit Code* (ICC) is a state law that regulates certain terms and conditions of consumer credit in Idaho. A consumer credit transaction is a credit sale or loan in which the credit is extended by a person who is regularly engaged in the credit business, to a borrower who will use it for a personal, family or household purpose, and in which a finance charge is made or the debt is payable in installments.

The ICC does not apply to first mortgages but does apply to subordinate lien mortgages. Most other consumer transactions such as automobile loans and the use of credit cards are subject to the ICC. The ICC also applies to single advance payday loan transactions and short-term equity loans on titled vehicles. The ICC includes specific lending procedures and consumer protection provisions for the payday and title lending industries in Idaho, as well as separate licensing requirements for payday lenders. The ICC also includes other generally applicable consumer protection provisions, such as a consumer's right to be informed about the costs of a loan before it is made, and the right to cancel a payday or title loan by the next business day after it is extended, and the right to cancel certain home solicitation sales and real estate transactions.

Licensing/Lending Activity – Under the ICC, creditors engaged in the business of making regulated consumer loans, or taking assignment of and undertaking direct collection of payments from debtors arising from regulated consumer loans, must obtain a regulated lender license. Regulated lenders must file for license renewal and submit composite annual reports on or before May 31 of each year.

During fiscal year 2008 lending activity by state licensed regulated lenders ranged from a sole-proprietor title lender to a national finance



company with nearly a billion dollars in outstanding Idaho loans. The composition of regulated lenders is split between finance companies, including second mortgage lenders, consumer loan assignees, and payday/title lenders. The 2008 Idaho Legislature removed a dual licensing requirement from the ICC that had required companies offering subordinate lien mortgages, which also maintained a license under the *Idaho Residential Mortgage Practices Act*, to obtain a regulated lender license. The elimination of this dual license requirement reduced the regulatory burden on licensees and resulted in a significant decrease in the number of regulated lender licensees. As of June 30, 2008, Idaho had 511 licensed regulated lender offices, which includes title lenders, consumer loan assignees, consumer finance companies, and 232 licensed payday lender offices.

Compliance/Enforcement – In addition to answering consumer inquiries and complaints, the Bureau staff conducts routine and “for-cause” on-site examinations of regulated lenders. The Bureau is committed to examining offices of payday and title lenders situated in Idaho regularly to ensure that their business practices comply with Idaho Credit Code standards. During the past fiscal year, the staff conducted 106 examinations of payday offices, 40 examinations of title loan offices, and 61 examinations of other regulated lender offices. The Bureau also received and acted upon 26 complaints from Idaho consumers regarding entities operating as regulated lenders, 6 complaints against title lenders, and 12 complaints against payday lenders.

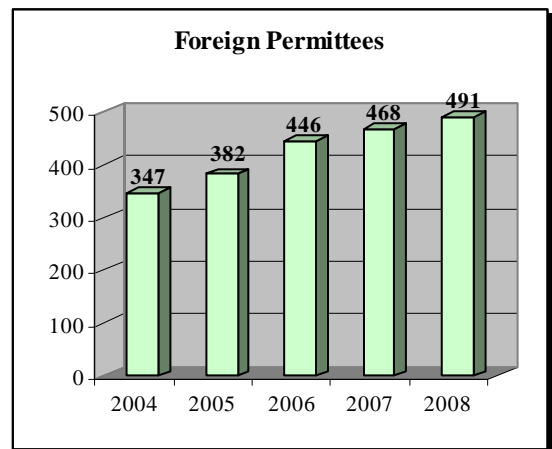
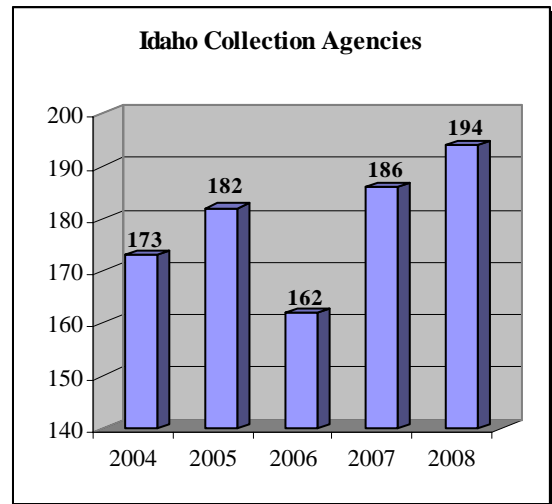
IDAHO COLLECTION AGENCY ACT

The Consumer Finance Bureau oversees collection agencies that collect from Idaho residents under the authority of the *Idaho Collection Agency Act* (Act). Consumers have an obligation to pay their debts. However, collection agencies must deal openly, fairly, honestly and without deception when collecting debts. This includes complying with the Federal Fair Debt Collection Practices Act.

Licensing – Under the Act, the following activities cannot be conducted in Idaho without obtaining a collection agency permit:

- Operating as a collection agency, debt counselor, credit counselor, or credit repair organization;

- Engaging, either directly or indirectly, in the business of collecting or receiving payment for another of any account, bill, claim, or other indebtedness;
- Soliciting or advertising to collect or receive payment for another of any account, bill, claim, or other indebtedness;
- Selling or distributing any system of collection letters in which the name of any person other than the creditor to whom the debt is owed appears;
- Engaging in any activity which indicates that a third party may be involved in effecting collections;
- Engaging in the business of credit or debt counseling, or credit repair; or
- Engaging in, or offering to engage in, the business of collecting any form of indebtedness for that person’s own account if the indebtedness was acquired from another person and if the indebtedness was either delinquent or in default at the time it was acquired.



The 2008 Idaho Legislature amended provisions of the Act that formerly allowed collection agencies, licensed in other states, to obtain a “foreign permit” to engage in collection activities in Idaho under certain

conditions. On July 1, 2008, the “foreign permittee” status was eliminated from the Act and all entities engaging in a collection agency business in Idaho are required to obtain a Collection Agency license. All collection agencies must renew their licenses and pay an annual renewal fee prior to March 15 of each year.

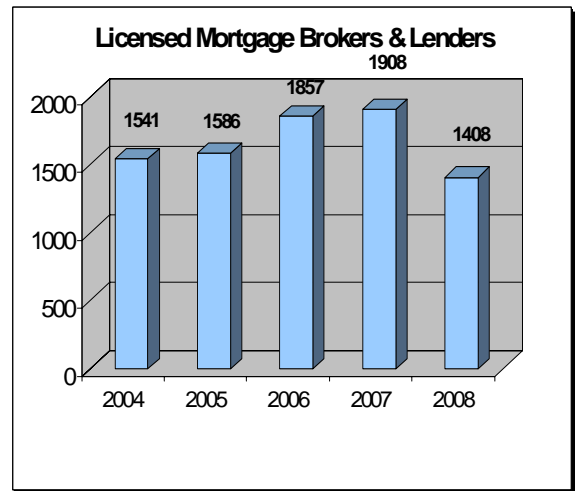
As of June 30, 2008, Idaho had 194 Idaho collection agencies, and 491 foreign permittees. These agencies had a combined total of 60,536 solicitors/collectors registered with the Department.

Compliance/Enforcement – In addition to answering consumer inquiries and complaints, the Bureau staff conducted 20 routine on-site examinations of Idaho collection agency offices during fiscal year 2008. The Bureau received 211 complaints against collection agencies and 10 complaints against credit/debt counselors. The Bureau issued various letters of caution to individuals and companies engaged in unlicensed debt collection, credit counseling, or credit repair activities informing them that their activities were in violation of Idaho law. Six companies entered into administrative settlement agreements to resolve allegations of violations of the Act. The Department filed one civil complaint against a collection agency that failed to obtain a collection agency permit prior to conducting collection activities in Idaho.

IDAHO RESIDENTIAL MORTGAGE PRACTICES ACT AND IDAHO MORTGAGE COMPANY ACT

Under the *Idaho Residential Mortgage Practices Act* (Act), all non exempt office locations from which mortgage brokering or mortgage lending activities are conducted are required to be licensed with the Department. The provisions of the Act also extend to individuals who originate residential mortgage loans for certain mortgage broker and lender licensees. The purpose of the Act is to ensure that companies and individuals offering mortgage services meet certain minimum standards and that consumers are protected from unfair practices.

Mortgage brokers are companies that assist borrowers in obtaining a mortgage loan from a bank or other lender. Mortgage lenders fund mortgage



loans and may also perform mortgage brokering activities. Loan originators assist in the preparation of residential mortgage loan applications for the purpose of obtaining a loan through a mortgage broker or lender. The Act applies to those making first mortgage loans as well as to those making subordinated lien loans secured by residential real property.

In addition, the Department has authority under the *Idaho Mortgage Company Act* to ensure that mortgage companies are properly handling borrower reserves, impound and escrow accounts, as well as properly applying borrower payments.

Licensing – The Act requires that mortgage brokers and mortgage lenders obtain a license for each office from which they conduct mortgage business. Licensees are not required to have a physical office location in Idaho. In fact, the Department has license holders nationwide. The Department issued 356 mortgage broker/lender licenses during fiscal year 2008. As of June 30, 2008, the Department had 1,408 active mortgage broker/lender licenses in effect. The Department has experienced licensee growth in all years prior to 2008, with the largest increases seen in fiscal years 2006 and 2007, at the height of growth in the mortgage market. However, a decline in licensees was realized in fiscal year 2008, following deterioration in mortgage lending credit markets, resulting in a net decrease in licensees at the end of fiscal 2008 of 26.2% as compared to the number of licensees at the end of fiscal 2007. The Department also observed a decline in the number of loan originator licensees where licensing decreased over 18% from 4,716 at the end of fiscal 2007 to 3,392 at the end of fiscal 2008.

Compliance – The Bureau conducts routine and “for-cause” on-site examinations of mortgage brokers, lenders, and mortgage loan originators to verify that business is conducted in accordance with the Act. The Bureau conducted 18 mortgage broker/lender examinations in fiscal year 2008. The Bureau also handles customer complaints and inquiries. In fiscal year 2008, the Department received and processed 142 complaints against mortgage brokers and lenders, and 3 complaints against mortgage loan originators.

Mortgage Loan Delinquencies – In fiscal year 2008, residential mortgage loan default rates across the nation continued to increase over past years. While home foreclosures are rising in many areas of the country, Idaho has not been as dramatically affected as other states. By the end of fiscal year 2008, 5,850 Idaho properties were subject to seriously delinquent mortgage payments or were in foreclosure. The percentage of residential mortgage loans nationwide that were seriously delinquent or in foreclosure at fiscal year end was 4.5 percent. However, this was 103 percent higher than Idaho’s average at 2.22 percent. By June 30, 2008, only eight states ranked more favorably than Idaho for percentages of mortgage loans considered seriously delinquent.

Enforcement – The Department initiated 15 administrative actions against licensed mortgage brokers/lenders and ordered three mortgage brokers/lenders to cease and desist from violations of the Act. Additionally, as part of its oversight of individuals engaged in mortgage loan origination activity, the Department of Finance ordered two mortgage loan originators to cease and desist from violations of the Act and initiated four administrative actions against mortgage loan originators. These enforcement actions addressed a variety of mortgage practices representing violations of the Act, as well as license application deficiencies. Details of these actions are provided in Exhibit VI.

IDAHO ESCROW ACT

The *Idaho Escrow Act*, assigns regulatory oversight responsibilities to the Idaho Department of Finance over independent Idaho escrow agencies. Beginning in fiscal 2006, Idaho escrow agencies, as defined in the Idaho Escrow Act, were required to obtain a license prior to engaging in escrow activities in Idaho. This includes exchange accommodators who facilitate “1031” exchanges, pursuant to 26 USC §1031. As of June 30, 2008, the Department had issued 39 licenses to entities engaged in escrow activities in the state of Idaho. Additionally, the Bureau received five complaints against escrow companies.

REGULATORY AND EDUCATIONAL INITIATIVES

Regulatory Initiatives – To promote uniformity, reduce mortgage fraud, and eliminate a patchwork of duplicative state regulatory requirements in the mortgage industry, during fiscal 2008 the Department continued with its conversion to the Nationwide Mortgage Licensing System (NMLS). The NMLS became operational on January 2, 2008, and Idaho was one of seven initial states joining the system. As of the date of publication of this Annual Report, 53 state agencies, representing 48 states and territories have committed to join the system over the next two years. Eventually, it is expected that all 50 states will be participants in the nationwide mortgage licensing system, which is expected to greatly enhance overall supervision of the mortgage industry. Pursuant to its commitment participate in the NMLS, during the fiscal year the Department adopted temporary rules to implement the required use of the NMLS by licensed mortgage brokers/lenders and mortgage loan originators, as well as by new mortgage license applicants. During the 2008 Idaho Legislature, the House Business Committee and the Senate Commerce and Human Resources Committee moved to allow the

Department's temporary rule to remain effective contingent on the adoption of a permanent rule in 2009.

On June 29, 2007, the FDIC, the Board of Governors of the Federal Reserve System, the OCC, the Office of Thrift Supervision, and the NCUA publicly released the "Statement on Subprime Mortgage Lending" (Subprime Statement) to address emerging risks associated with certain subprime mortgage products and lending practices. Recognizing that the Subprime Statement does not apply to subprime originations of independent mortgage lenders and mortgage brokers, on August 8, 2007, the Department adopted a parallel Subprime Statement (Parallel Subprime Statement -- Policy Statement 2007-5) developed by the CSBS, AARMR, and NACCA. The Parallel Subprime Statement essentially mirrors the Subprime Statement adopted by the Federal Agencies and promotes sound underwriting and consumer protection principles that institutions and all residential mortgage providers should consider when making residential mortgage loans. In March 2008, the Department participated with 13 other states in a joint examination of a nationwide mortgage lender using Policy Statement 2007-5 and Policy Statement 2006-2, related to non-traditional mortgage product risk, as templates for the joint compliance examination. The Department has committed to continuing its participation in such joint examinations to promote uniform regulation of mortgage broker/lender licensees operating in multiple states.

During the 2008 Legislature, the Department also sponsored amendments to certain laws it administers for the purpose of increasing the efficiency of its oversight of financial services providers. The amendments which were adopted by the 2008 Legislature, and which became effective on July 1, 2008 included:

- Amendments to the *Idaho Escrow Act* to include consumer restitution as a remedy that can be sought by the Department in an action to enforce the provisions of that law;
- Amendments to the *Idaho Residential Mortgage Practices Act* to (1) enable the Director to adopt pre-license testing requirements by rule, (2) clarify that mortgage brokering/lending and loan origination activities include engaging in such activities in the expectation of compensation or gain, and (3) clarify that the law applies to loans secured by 1-4 family unit dwellings regardless of occupancy;

- Amendments to the *Idaho Credit Code* to add an exemption from licensure for companies engaging in retail mortgage lending which are already licensed under the *Idaho Residential Mortgage Practices Act* thereby removing a dual licensing requirement. The ICC was also amended to remove a limitation on a consumer finance company from relocating more than five miles from its initial licensed location; and,
- Amendments to the Idaho Collection Agency Act to (1) establish uniformity in licensing requirements for collection agencies operating in Idaho regardless of whether the companies have offices inside or outside of the state, (2) eliminate an in-state office requirement and replace a testing requirement with an experience requirement for office managers, (3) add a definition of credit repair organizations, which were currently required to be licensed under the law, and to implement associated requirements and restrictions on the practices of such companies, and (4) repeal requirements that credit and debt counselors maintain a status as a non-profit 501(c)(3) organization for the purpose of obtaining a license.

In response to the nationwide effect of deteriorating conditions in the mortgage lending market, on July 30, 2008, the 110th Congress passed Public Law 110-289, which was proposed in its original version on July 30, 2007. The law, known as the Housing and Economic Recovery Act of 2008 includes the Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (SAFE Act). During fiscal year 2008 and prior to the passage of the SAFE Act, the Department was regularly involved in the efforts of the Conference of State Bank Supervisors (CSBS) and the American Association of Residential Mortgage Regulators (AARMR) to provide information and testimony to Congress on the role of state agencies in the licensure and regulation of mortgage loan originators. An important element to the final passage of the SAFE Act was the role that state agencies, such as the Department, had in the development and implementation of the NMLS. Key provisions of the final act require uniform licensing requirements within all states that adopt the use of the NMLS, renamed for purposes of the SAFE Act as the “Nationwide Mortgage Licensing System and Registry.”. The Department’s participation in the development and implementation of the NMLS throughout 2008 and in years places the Department in a good position to implement the provisions of the SAFE Act

through amendments to the Idaho Residential Mortgage Practices Act, which will be proposed during the 2009 Legislature.

SECURITIES BUREAU

Uniform Securities Act
Idaho Commodity Code
Control Share Acquisition Act
Business Combination Act

Idaho Money Transmitters Act
Endowment Care Cemetery Act
Continuing Care Disclosure Act

The Securities Bureau administers and enforces several consumer and business protection statutes. Through the authority of the *Uniform Securities Act* and the *Idaho Commodity Code*, the Bureau regulates the sale of investment securities and those individuals and entities that offer investment opportunities to the public. The Bureau's objectives in administering and enforcing these statutes include promoting the integrity and vitality of state and federal financial markets, protecting the investing public from fraudulent investment schemes, and assisting legitimate businesses in their efforts to raise capital in Idaho.

In addition, the Bureau has limited duties under Idaho's *Control Share Acquisition Act*, *Business Combination Act*, and *Continuing-Care Disclosure Act*. Also, the Bureau ensures that endowed care cemeteries properly handle the funds and trust placed with them through administration of the *Endowment Care Cemetery Act*.

Finally, the Securities Bureau is responsible for the licensing and enforcement provisions of the *Idaho Money Transmitters Act*. A money transmitter includes any business engaged in receiving money for transmission by any and all means and any business that issues payment instruments to purchasers (e.g., money orders).

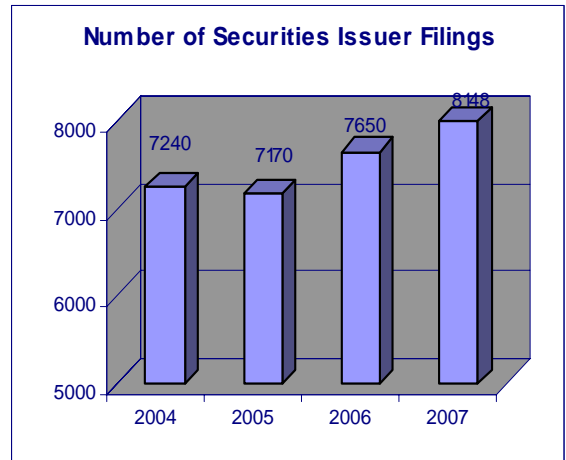
Where individuals or entities violate these statutes, appropriate remedies are sought using statutory and administrative enforcement authority. The Bureau also provides assistance in criminal prosecutions when necessary.

UNIFORM SECURITIES ACT

The *Uniform Securities Act* (Act) seeks to preserve and promote legitimate securities markets by assisting companies in their attempts to raise capital and prevent investment fraud. While the Act is designed to protect investors from fraud, it does not protect investors from the possibility of investment loss resulting from securities price movements, market changes or

business failures. The Act requires that persons who solicit investments provide complete disclosure of all the important aspects of the investment being promoted. With this information, investors are empowered to make reasoned investment decisions.

Securities Issuer Filings – Generally, any public offering of newly issued securities must be registered with Securities Bureau before it is offered to public investors. The review is designed to determine whether the offering materials provide full, fair and accurate disclosure of all material information and whether the offering materials contain fraudulent terms or the offering is structured unfairly.



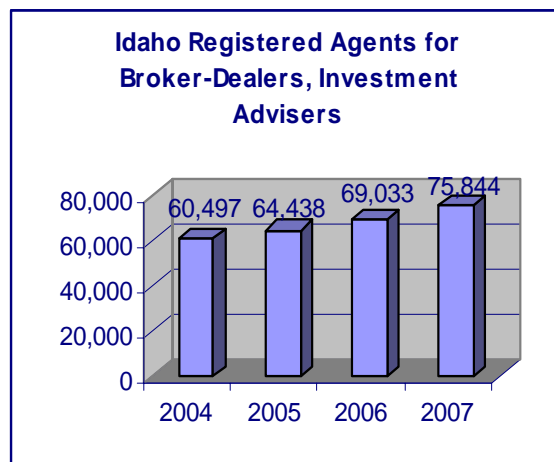
Registration of Firms and Agents – The Bureau registers and provides oversight for most broker-dealers, securities sales agents and investment advisory representatives doing business in or from Idaho. Additionally, the Bureau registers and is the sole regulator for investment advisory firms that are located in Idaho and manage assets of \$25 million or less. Every application for registration is examined either electronically or manually prior to approval.

As shown in the accompanying charts, the number of firms and agents coming under state supervision remained consistent with fiscal year 2007 levels.



The Bureau has oversight responsibility for more than 1600 broker-dealer firms and state registered investment adviser firms. This oversight also extends to more than 80,000 individuals who currently hold Idaho registrations as broker-dealer agents, investment adviser representatives and issuer agents. This represents a 5.95% increase over the prior fiscal year.

Compliance – In an effort to assure that the securities industry is complying with the Idaho Uniform Securities Act, registration amendments are regularly reviewed to consider changes in the applicant’s business, ownership and new disciplinary information. Bureau staff also investigates investor complaints, reviews advertising and analyzes financial data on broker-dealer and investment adviser firms.



Finally, periodic on-site examinations of broker-dealer and investment adviser offices are conducted to verify compliance with the Act and to educate industry professionals. When a violation is discovered, the Department determines whether sanctions are appropriate or whether other corrective action can address the issue. The Bureau may seek fines, deny, suspend or revoke licenses or initiate administrative or court action.

Enforcement – As an enforcement agency, one of the Bureau’s missions is to protect Idaho investors from fraudulent investment schemes. Bureau professionals investigate complaints of possible violations of the Act, negotiate administrative sanctions, assist in bringing civil lawsuits and assist in criminal prosecutions to enforce the law. The potential financial impact of securities cases under investigation during the fiscal year exceeded \$106 million⁴ million. Details of the administrative and civil court actions filed or completed by the Department during fiscal 2008 are provided in Exhibit VI.

Rescissions & Refunds – As a result of the Bureau’s regulatory enforcement efforts, Idaho residents were offered, or awarded in judgments by the courts, nearly \$3.2 million in refunds on their securities investments. This total includes amounts refunded to Idaho investors due to the administrative enforcement actions described earlier as well as voluntary rescission offers made in accordance with the Act.

Civil Penalties and Administrative Fines –The Bureau assessed total fines and penalties of approximately \$300,000 for fiscal year 2008.

⁴ During the fiscal year, the Department undertook an investigation of a seller of auction rate securities. The financial impact of that case alone was approximately \$75 million.

IDAHO MONEY TRANSMITTERS

The Department of Finance is charged with the responsibility of administering and enforcing the *Idaho Money Transmitter Act*. A “money transmitter” is defined as any business engaged in receiving money for transmission or transmitting money within the United States or to locations outside the United States by any and all means including, but not limited to, payment instruments, wire transfers, and facsimile or electronic transfers. At fiscal year end, the Department had 38 licensees under this statute.

ENDOWMENT CARE CEMETERIES

A “perpetual” or “endowed care cemetery” is a cemetery where lots are sold under the representation that the cemetery and lots will receive perpetual maintenance and oversight. This “endowed care” is provided free of further cost to the purchaser after payment of the original purchase price for a lot or burial space. All “endowed care” or “perpetual care” cemeteries in Idaho are required to be registered with the Securities Bureau. The purpose of the *Endowment Care Cemetery Act* is to ensure that sound business practices essential to the continued furnishing of endowed or perpetual care are followed.

An endowed or perpetual care cemetery is required to establish an irrevocable trust fund in the sum of at least \$50,000 for the care of the cemetery. The income from the trust fund may only be used for the general care, maintenance, and embellishment of the cemetery.

There are 12 endowed care cemeteries licensed in Idaho. Each of these cemeteries is required to submit a renewal fee and form every year, along with a financial statement for its trust account. The Securities Bureau conducts periodic audits of endowed care cemeteries to verify that the trust funds are being handled properly.

Name of Cemetery	Location
Cloverdale Memorial Park Assoc., Inc.	Boise
Coeur d'Alene Memorial Gardens, Inc.	Coeur d'Alene
Filer Cemetery Association, Inc.	Filer
Hillcrest Memorial Gardens, Inc.	Caldwell
Lakeview Cemetery Association	Sandpoint
Lewis-Clark Memorial Park, Inc.	Lewiston
Mountain View Memorial Park, Inc.	Boise
Pinecrest Memorial Park	Sandpoint
Rosedale Memorial Park, Inc.	Payette
Shoshone Memorial Gardens, Inc.	Pinehurst
Sunset Memorial Park	Twin Falls
Twin Falls Cemetery Association	Twin Falls

IDAHO COMMODITY CODE

The *Idaho Commodity Code* is designed to reduce fraud by outlawing certain commodity investment contracts where the investor never receives delivery of the commodity. The statute provides an enforcement tool to prevent and prosecute illegal and fraudulent schemes involving commodity contracts and to maximize coordination with federal law and laws of other states. It has proven effective in Department lawsuits against fraudulent commodity investment schemes, including several enforcement cases during recent years.

CORPORATE TAKEOVER ACTS

In 1988, the Legislature adopted the *Control Share Acquisition Act* and the *Business Combination Act* to govern certain corporate mergers in Idaho. The first law gives shareholders more authority to decide the terms of a takeover and the second allows a corporation to limit the effects of a takeover. There was no activity by the Department involving Idaho companies covered by these laws during the fiscal year.

CONTINUING-CARE DISCLOSURE ACT

Idaho's *Continuing-Care Disclosure Act* was enacted in 1988 in response to problems caused when residents of an Idaho nursing home lost their money due to embezzlement and mismanagement. The statute regulates entities that offer to provide long-term care and lodging after an advance fee payment often called an "entrance fee". Anyone wanting to offer this type of program is required to register with the Securities Bureau, provide detailed disclosure to purchasers, and adhere to several other requirements. No facility has yet registered to offer this type of program in Idaho.

SUPPORTING SERVICES BUREAU

This Bureau provides operational support to the Director and the chiefs of the other Bureaus in carrying out their program responsibilities. This support is provided through the development and maintenance of the accounting system and records for the Department; maintenance of personnel records; preparation and submission of the Department's budget; providing financial, management and statistical reports; coordination of the Department's business services; and, maintenance of the Department's information technology systems.

The Supporting Services Bureau completed several large projects this year including overseeing design and transition into a comprehensive records management system, completion of several large databases; including Mortgage Loan Originators, Mortgage Loan Originator Continuing Education, and the first phase of a Case Management database to aid in investigation and enforcement actions.

The following information regarding the Department is included in the following exhibits:

Exhibit II	Summary of Income and Expenses
Exhibit VII	Department of Finance Staff
Exhibit VIII	Americans with Disabilities Act Compliance Statement
Exhibit IX	Civil Rights Grievance Procedure

**DEPARTMENT OF FINANCE DIRECTORS/COMMISSIONERS
SINCE DATE OF ITS CREATION BY ACT OF LEGISLATURE IN 1905**

<u>Director/Commissioner</u>	<u>Term of Office</u>
C. C. Loveland	March 6, 1905 to June 1, 1907
W. S. Chaney	June 1, 1907 to March 6, 1909
William G. Cruse	March 6, 1909 to June 2, 1911
V. W. Platt	June 2, 1911 to February 1, 1913
A. E. Reid	February 1, 1913 to February 6, 1915
G. R. Hitt	February 6, 1915 to January 25, 1919
Jay Givson	January 25, 1919 to September 10, 1920
J. G. Fralick	September 10, 1920 to February 7, 1923
E. W. Potter	February 7, 1923 to February 1, 1931
Ben Diefendorf	February 1, 1931 to January 13, 1937
George W. Wedgwood	January 13, 1937 to January 1, 1939
G. L. Jenkins	January 1, 1939 to January 6, 1941
George W. Wedgwood	January 6, 1941 to January 4, 1943
G. L. Jenkins	January 4, 1943 to January 2, 1945
J. B. Newport	January 4, 1945 to December 28, 1946
William J. Sewell	December 28, 1946 to January 6, 1947
E. F. Haworth	January 6, 1947 to August 15, 1952
Austin Schauweiler	August 15, 1952 to May 14, 1954
R. U. Spaulding	June 17, 1954 to April 14, 1961
J. L. McCarthy	June 1, 1961 to July 9, 1965
Tom D. McEldowney (Acting)	August 10, 1965 to January 31, 1967
John D. Silva	February 1, 1967 to January 4, 1971
Tom D. McEldowney (Acting)	January 4, 1971 to August 29, 1971
Tom D. McEldowney	August 30, 1971 to March 31, 1987
Belton J. Patty	April 1, 1987 to January 1, 1995
Gavin M. Gee (Acting)	January 2, 1995 to March 13, 1996
Gavin M. Gee	March 13, 1996 to Present

SUMMARY OF INCOME AND EXPENSES

July 1, 2007 through June 30, 2008

INCOME BY SOURCE

Dedicated Account-----	\$10,699,608.07
TOTAL INCOME COLLECTED-----	\$10,699,608.07

APPROPRIATION

Dedicated Account-----	\$5,089,800.00
TOTAL APPROPRIATION-----	\$5,089,800.00

EXPENDITURES

Personnel Costs-----	\$3,547,523.00
Operating Expenditures-----	\$1,398,657.00
Capital Outlay-----	\$102,629.00
TOTAL EXPENDITURES-----	\$5,048,809.00
BALANCE OF APPROPRIATION-----	\$40,991.00

EXPENDITURES BY MAJOR CLASSES

Salaries & Wages-----	\$2,651,152.00
Personnel Benefits-----	\$896,371.00
Communication Services-----	\$51,072.00
Employee Development & Other Services-----	\$153,595.00
Professional Services-----	\$446,450.00
Repairs & Maintenance Service-----	\$14,984.00
Administrative Services-----	\$10,038.00
DP Services-----	\$67,943.00
Employee Travel-----	\$219,673.00
Materials & Supplies-----	\$88,261.00
Insurance-----	\$3,972.00
Rentals & Operating Leases-----	\$313,596.00
Miscellaneous Operating Expenditures-----	\$29,073.00
Capital Outlay-----	\$102,629.00
TOTAL EXPENDITURES BY MAJOR CLASSES-----	\$5,048,809.00

PERSONNEL STATUS	POSITIONS AUTHORIZED	POSITIONS APPROPRIATED	POSITIONS FILLED
Full-Time Employees	52	52	51
Part-Time Employees			
TOTALS	52	52	51

FUND SOURCE

Security Investor Fund-----	\$50,000.00
TOTAL COLLECTED-----	\$50,000.00

EXPENDITURES

Personnel Costs-----	\$0.00
Operating Expenditures-----	\$49,967.00
Capital Outlay-----	\$0.00
TOTAL EXPENDITURES-----	\$49,967.00
BALANCE OF FUND-----	\$33.00

STATE OF IDAHO
STATE-CHARTERED BANKS AND SAVINGS BANKS*
COMPARATIVE STATEMENT
Close of Business 12/31/07 and 12/31/06
(000's Omitted)

	2007	2006	\$ Change
Cash and balances due from depository institutions			
Noninterest-bearing balances and currency and coin	169,464	168,783	681
Interest-bearing balances	61,610	27,073	34,537
Securities:			
Held-to-maturity securities	102,996	130,970	-27,974
Available-for-sale securities	601,675	589,347	12,328
Federal funds sold and securities purchased under agreements to resell			
Federal funds sold	87,876	99,606	-11,730
Securities purchased under agreements to resell			
Loans and lease financing receivables			
Loans and leases held for sale	44,525	48,862	-4,337
Loans and leases, net of unearned income	4,272,462	3,678,729	593,733
LESS: Allowance for loan and lease losses	58,531	51,280	7,251
Loans and leases, net of unearned income and allowance	4,213,931	3,627,449	586,482
Trading assets	2,754	2,128	626
Premises and fixed assets (including capitalized leases)	129,560	108,290	21,270
Other real estate owned	2,631	1,469	1,162
Intangible assets:			
Goodwill	44,596	44,374	222
Other intangible assets	1,949	2,463	-514
Other assets	108,473	100,539	7,934
Total assets	<u>5,527,515</u>	<u>4,951,353</u>	<u>576,162</u>
Deposits:			
In domestic offices:			
Noninterest-bearing	4,202,375	3,973,000	229,375
Interest-bearing	965,957	996,193	-30,236
Federal funds purchased and securities sold under agreements to repurchase	3,236,421	2,976,806	259,615
Federal funds purchased and securities sold under agreements to repurchase			
Federal funds purchased	15,350	14,107	1,243
Securities sold under agreements to repurchase	262,459	203,786	58,673
Trading liabilities			
Other borrowed money	371,572	194,880	176,692
Bank's liability on acceptances executed and outstanding			
Subordinated notes and debentures			
Other liabilities	51,544	46,999	4,545
Total liabilities	<u>4,903,300</u>	<u>4,432,772</u>	<u>470,528</u>
Minority interest in consolidated subsidiaries			
Perpetual preferred stock and related surplus			
Common stock	71,592	60,950	10,642
Surplus (exclude all surplus related to preferred stock)	318,481	272,465	46,016
Retained earnings and Other Equity Capital Components	234,142	185,166	48,976
Total equity capital	<u>624,215</u>	<u>518,581</u>	<u>105,634</u>
Total liabilities, minority interest, and equity capital	<u>5,527,515</u>	<u>4,951,353</u>	<u>576,162</u>

* Includes only state-chartered banks headquartered in Idaho as of 12/31/2007 and 12/31/2006
Source: Federal Deposit Insurance Corporation

DECEMBER 31, 2007
BANK OF IDAHO
IDAHO FALLS, IDAHO
Charter No. 240
Charter Issued September 13, 1985
Incorporated July 17, 1985

OFFICERS:

Chief Executive Officer: William F. Rigby
President: Park Price
Chief Financial Officer: Jeff R. Manser

DIRECTORS:

Emma L. Atchley; Steven E. Carr;
Ralph M. Hartwell; Kenlon P. Johnson;
Harold L. Latin; Park Price;
John Rigby; William F. Rigby;
Fred T. Thompson, Jr.; Ronald R. Warnecke

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	8,381
Interest-bearing balances	23
Securities:	
Held-to-maturity securities	2,883
Available-for-sale securities	35,021
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	0
Securities purchased under agreements to resell	5,402
Loans and lease financing receivables	
Loans and leases held for sale	5,402
Loans and leases, net of unearned income	199,855
LESS: Allowance for loan and lease losses	2,577
Loans and leases, net of unearned income and allowance	197,278
Trading assets	0
Premises and fixed assets (including capitalized leases)	5,185
Other real estate owned	198
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	3,133
Total assets	<u><u>257,504</u></u>
Deposits:	
In domestic offices:	198,300
Noninterest-bearing	55,000
Interest-bearing	143,300
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	12,850
Securities sold under agreements to repurchase	22,527
Trading liabilities	0
Other borrowed money	35
Subordinated notes and debentures	0
Other liabilities	2,725
Total liabilities	<u>236,437</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	1,402
Surplus (exclude all surplus related to preferred stock)	9,208
Retained earnings	10,319
Accumulated other comprehensive income	138
Other equity capital components	0
Total equity capital	<u>21,067</u>
Total liabilities, minority interest, and equity capital	<u><u>257,504</u></u>

DECEMBER 31, 2007
bankcda
COEUR D'ALENE, IDAHO
Charter No. 258
Charter Issued May 3, 2001
Incorporated October 16, 2000

OFFICERS:

President & Chief Executive Officer: Max Faller
Chief Financial Officer: Nora Boman Knight

DIRECTORS:

Charles Clock; Max Faller; Joseph Haley,
Mark Kontos; C. Richard Nordstrom;
Ben Rolphe; John Shovic;
Wayne Sorensen; Craig Tedmon

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	1,580
Interest-bearing balances	3,101
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	7,349
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	6,285
Securities purchased under agreements to resell	0
Loans and lease financing receivables	
Loans and leases held for sale	0
Loans and leases, net of unearned income	70,291
LESS: Allowance for loan and lease losses	851
Loans and leases, net of unearned income and allowance	69,440
Trading assets	0
Premises and fixed assets (including capitalized leases)	428
Other real estate owned	0
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	2,691
Total assets	<u>90,874</u>
Deposits:	
In domestic offices:	76,554
Noninterest-bearing	10,501
Interest-bearing	66,053
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	0
Trading liabilities	0
Other borrowed money	3,941
Subordinated notes and debentures	0
Other liabilities	944
Total liabilities	<u>81,439</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	6,227
Surplus (exclude all surplus related to preferred stock)	1,643
Retained earnings	1,544
Accumulated other comprehensive income	21
Other equity capital components	0
Total equity capital	<u>9,435</u>
Total liabilities, minority interest, and equity capital	<u>90,874</u>

DECEMBER 31, 2007
CITIZENS COMMUNITY BANK
POCATELLO, IDAHO
Charter No. 254
Charter Issued June 6, 1997
Incorporated April 17, 1996

OFFICERS:

President & Chief Executive Officer: Ralph G. Cottle
Chief Financial Officer: Terrill R. Schwartz

DIRECTORS:

Gary N. Blanchard; Ralph G. Cottle; H. Brent Hill;
Thomas J. Holmes; W. James Johnston; William A. Knick;
James E. Lee; Diana B. Lyon; Kenneth A. Satterfield;
Michael Blodnick; Alan E. Stanek; James H. Strosahl;
Jim Windmiller; J. Loren Azzola; Dave Hermansen

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	5,125
Interest-bearing balances	6,934
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	11,255
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	6,304
Securities purchased under agreements to resell	1,190
Loans and lease financing receivables	
Loans and leases held for sale	1,190
Loans and leases, net of unearned income	133,072
LESS: Allowance for loan and lease losses	2,274
Loans and leases, net of unearned income and allowance	130,798
Trading assets	0
Premises and fixed assets (including capitalized leases)	6,641
Other real estate owned	209
Intangible assets:	
Goodwill	9,553
Other intangible assets	532
Other assets	4,142
Total assets	182,683
Deposits:	
In domestic offices:	139,227
Noninterest-bearing	28,833
Interest-bearing	110,395
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	14,529
Trading liabilities	0
Other borrowed money	0
Subordinated notes and debentures	0
Other liabilities	1,120
Total liabilities	154,876
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	2,193
Surplus (exclude all surplus related to preferred stock)	19,011
Retained earnings	6,605
Accumulated other comprehensive income	-2
Other equity capital components	0
Total equity capital	27,807
Total liabilities, minority interest, and equity capital	182,683

DECEMBER 31, 2007
COMMUNITY 1ST BANK
POST FALLS, IDAHO
Charter No.
Charter Issued
Incorporated

OFFICERS:

Chief Executive Officer: David P. Bobbitt
President: Jerry C. Lyon
Chief Financial Officer: William Basom

DIRECTORS:

David P. Bobbitt; William R. Basom;
Douglas J. Chadderdon; David B. Holloway;
Cyndie J. Johnson; Jerry C. Lyon;
Gary T. Schneidmiller; Jack P. Tibesar

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	301
Interest-bearing balances	6,251
Securities:	
Held-to-maturity securities	9,933
Available-for-sale securities	0
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	3,285
Securities purchased under agreements to resell	0
Loans and lease financing receivables	
Loans and leases held for sale	0
Loans and leases, net of unearned income	2,922
LESS: Allowance for loan and lease losses	18
Loans and leases, net of unearned income and allowance	2,904
Trading assets	0
Premises and fixed assets (including capitalized leases)	1,047
Other real estate owned	0
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	155
Total assets	23,876
Deposits:	
In domestic offices:	14,024
Noninterest-bearing	529
Interest-bearing	13,495
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	0
Trading liabilities	0
Other borrowed money	0
Subordinated notes and debentures	0
Other liabilities	92
Total liabilities	14,116
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	5,250
Surplus (exclude all surplus related to preferred stock)	5,229
Retained earnings	-719
Accumulated other comprehensive income	0
Other equity capital components	0
Total equity capital	9,760
Total liabilities, minority interest, and equity capital	23,876

DECEMBER 31, 2007
D. L. EVANS BANK
BURLEY, IDAHO
Charter No. 26
Charter Issued August 29, 1904
Incorporated August 23, 1904

OFFICERS:

Chief Executive Officer: John V. Evans, Jr.
President: John V. Evans, Sr.
Chief Financial Officer: Brenda Sanford

DIRECTORS:

John V. Evans, Jr.; John V. Evans, Sr.; Don S. Evans, Sr.;
Don S. Evans, Jr.; Larry L. Evans; M. DeLell Evans;
Paula D. Evans; Martha Gilgen; Glen R. Kunau;
Lex H. Kunau; James J. Lynch; Susan D. Evans Scarlett;
David L. Evans IV

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	30,854
Interest-bearing balances	778
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	96,087
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	246
Securities purchased under agreements to resell	3,016
Loans and lease financing receivables	
Loans and leases held for sale	3,016
Loans and leases, net of unearned income	596,688
LESS: Allowance for loan and lease losses	7,329
Loans and leases, net of unearned income and allowance	589,359
Trading assets	0
Premises and fixed assets (including capitalized leases)	31,224
Other real estate owned	112
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	12,060
Total assets	<u><u>763,736</u></u>
Deposits:	
In domestic offices:	640,269
Noninterest-bearing	123,520
Interest-bearing	516,749
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	37,965
Trading liabilities	0
Other borrowed money	19,000
Subordinated notes and debentures	0
Other liabilities	4,057
Total liabilities	<u>701,291</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	901
Surplus (exclude all surplus related to preferred stock)	38,225
Retained earnings	23,047
Accumulated other comprehensive income	272
Other equity capital components	0
Total equity capital	<u>62,445</u>
Total liabilities, minority interest, and equity capital	<u><u>763,736</u></u>

DECEMBER 31, 2007
IDAHO BANKING COMPANY
BOISE, IDAHO
Charter No. 250
Charter Issued October 3, 1996
Incorporated May 14, 1996

OFFICERS:

President & Chief Executive Officer: Gary Quast
Chief Financial Officer: Bruce Barfuss

DIRECTORS:

V. Dale Babbitt; M. Dean Buffington;
Leo S. Harf; B. Randy Harris;
Thomas F. Kealey; Tom Morgan;
John S. Simko

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	4,399
Interest-bearing balances	316
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	25,336
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	5,782
Securities purchased under agreements to resell	1,714
Loans and lease financing receivables	
Loans and leases held for sale	1,714
Loans and leases, net of unearned income	188,652
LESS: Allowance for loan and lease losses	2,623
Loans and leases, net of unearned income and allowance	186,029
Trading assets	0
Premises and fixed assets (including capitalized leases)	4,291
Other real estate owned	0
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	6,332
Total assets	234,199
Deposits:	
In domestic offices:	189,563
Noninterest-bearing	26,000
Interest-bearing	163,563
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	9,217
Trading liabilities	0
Other borrowed money	9,800
Subordinated notes and debentures	0
Other liabilities	1,817
Total liabilities	210,397
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	4,299
Surplus (exclude all surplus related to preferred stock)	14,251
Retained earnings	5,180
Accumulated other comprehensive income	72
Other equity capital components	0
Total equity capital	23,802
Total liabilities, minority interest, and equity capital	234,199

DECEMBER 31, 2007
IDAHO FIRST BANK
MCCALL, IDAHO
Charter No. 259
Charter Issued September 3, 2005
Incorporated March 3, 2005

OFFICERS:

President & Chief Executive Officer: Greg P. Lovell
Chief Financial Officer: Don D. Madsen

DIRECTORS:

Natalie A. Barry; James F. Fletcher;
Daniel C. Krahn; Larry LaRocco; Greg P. Lovell;
Terry L. Robinson; Brenda L. Totorica

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	685
Interest-bearing balances	309
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	7,755
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	600
Securities purchased under agreements to resell	138
Loans and lease financing receivables	
Loans and leases held for sale	138
Loans and leases, net of unearned income	26,985
LESS: Allowance for loan and lease losses	400
Loans and leases, net of unearned income and allowance	26,585
Trading assets	0
Premises and fixed assets (including capitalized leases)	609
Other real estate owned	0
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	1,526
Total assets	<u><u>38,207</u></u>
Deposits:	
In domestic offices:	31,882
Noninterest-bearing	5,271
Interest-bearing	26,611
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	0
Trading liabilities	0
Other borrowed money	0
Subordinated notes and debentures	0
Other liabilities	321
Total liabilities	<u>32,203</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	4,555
Surplus (exclude all surplus related to preferred stock)	4,950
Retained earnings	-3,592
Accumulated other comprehensive income	91
Other equity capital components	0
Total equity capital	<u>6,004</u>
Total liabilities, minority interest, and equity capital	<u><u>38,207</u></u>

DECEMBER 31, 2007
IDAHO INDEPENDENT BANK
COEUR D'ALENE, IDAHO
Charter No. 246
Charter Issued September 7, 1993
Incorporated November 3, 1992

OFFICERS:

Chief Executive Officer: Jack W. Gustavel
 President & Chief Operating Officer: Kurt R. Gustavel
 Chief Financial Officer: Paul H. Montreuil

DIRECTORS:

Arthur Brown; Rod B. Colwell;
 Michael J. Coughlin; Roy L. Eiguren;
 Jack W. Gustavel; Kurt R. Gustavel;
 Terry Gustavel; Jerald J. Jaeger; Gary L. Mahn

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	12,602
Interest-bearing balances	34,788
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	17,315
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	19
Securities purchased under agreements to resell	4,756
Loans and lease financing receivables	
Loans and leases held for sale	4,756
Loans and leases, net of unearned income	525,120
LESS: Allowance for loan and lease losses	10,075
Loans and leases, net of unearned income and allowance	515,045
Trading assets	2,754
Premises and fixed assets (including capitalized leases)	19,556
Other real estate owned	0
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	19,087
Total assets	<u><u>625,922</u></u>
Deposits:	
In domestic offices:	471,495
Noninterest-bearing	123,527
Interest-bearing	347,968
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	31,910
Trading liabilities	0
Other borrowed money	45,313
Subordinated notes and debentures	0
Other liabilities	10,020
Total liabilities	<u>558,738</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	32,924
Surplus (exclude all surplus related to preferred stock)	42,411
Retained earnings	1,131
Accumulated other comprehensive income	14
Other equity capital components	-9,296
Total equity capital	<u>67,184</u>
Total liabilities, minority interest, and equity capital	<u><u>625,922</u></u>

DECEMBER 31, 2007
IRELAND BANK
MALAD, IDAHO
Charter No. 7
Charter Issued May 1, 1899
Incorporated December 8, 1892

OFFICERS:

President & Chief Executive Officer: R. Blair Hawkes
Chief Financial Officer: Lawrence G. Knudsen

DIRECTORS:

Timothy P. Deeg; R. Blair Hawkes; David G. Jenkins;
Mary Jane Jenkins; Jeff Schutte; Randon W. Wilson;
Randall E. Marshall

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	5,375
Interest-bearing balances	126
Securities:	
Held-to-maturity securities	4,808
Available-for-sale securities	39,472
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	448
Securities purchased under agreements to resell	65
Loans and lease financing receivables	
Loans and leases held for sale	65
Loans and leases, net of unearned income	134,251
LESS: Allowance for loan and lease losses	1,630
Loans and leases, net of unearned income and allowance	132,621
Trading assets	0
Premises and fixed assets (including capitalized leases)	2,386
Other real estate owned	419
Intangible assets:	
Goodwill	222
Other intangible assets	0
Other assets	7,049
Total assets	192,991
Deposits:	
In domestic offices:	165,681
Noninterest-bearing	39,520
Interest-bearing	126,161
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	2,500
Securities sold under agreements to repurchase	1,424
Trading liabilities	0
Other borrowed money	4,652
Subordinated notes and debentures	0
Other liabilities	1,404
Total liabilities	175,661
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	302
Surplus (exclude all surplus related to preferred stock)	5,367
Retained earnings	11,625
Accumulated other comprehensive income	36
Other equity capital components	0
Total equity capital	17,330
Total liabilities, minority interest, and equity capital	192,991

DECEMBER 31, 2007
MOUNTAIN WEST BANK
COEUR D'ALENE, IDAHO
Charter No. 256
Charter Issued June 30, 1999
Incorporated June 28, 1999

OFFICERS:

President & Chief Executive Officer: Jon W. Hippler
Chief Financial Officer: Ronn C. Rich

DIRECTORS:

Dennis Downer; Bradley E. Dugdale, Jr.; James English;
Tom Gibson; Jon Hippler; Marcia Johnson;
Stephen Meyer; Charles Nipp; J. Michael Patano;
Donald Shepherd; Thomas K. Thilo

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	29,206
Interest-bearing balances	8,729
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	106,148
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	0
Securities purchased under agreements to resell	23,314
Loans and lease financing receivables	
Loans and leases held for sale	23,314
Loans and leases, net of unearned income	823,502
LESS: Allowance for loan and lease losses	10,389
Loans and leases, net of unearned income and allowance	813,113
Trading assets	0
Premises and fixed assets (including capitalized leases)	21,627
Other real estate owned	11
Intangible assets:	
Goodwill	23,159
Other intangible assets	694
Other assets	11,873
Total assets	<u>1,037,874</u>
Deposits:	
In domestic offices:	666,330
Noninterest-bearing	183,034
Interest-bearing	483,297
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	20,760
Trading liabilities	0
Other borrowed money	227,651
Subordinated notes and debentures	0
Other liabilities	8,594
Total liabilities	<u>923,335</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	1,789
Surplus (exclude all surplus related to preferred stock)	55,322
Retained earnings	56,283
Accumulated other comprehensive income	1,145
Other equity capital components	0
Total equity capital	<u>114,539</u>
Total liabilities, minority interest, and equity capital	<u><u>1,037,874</u></u>

DECEMBER 31, 2007
PANHANDLE STATE BANK
SANDPOINT, IDAHO
Charter No. 238
Charter Issued May 15, 1981
Incorporated December 19, 1980

OFFICERS:

President & Chief Executive Officer: Curt Hecker
Chief Financial Officer: Douglas Wright

DIRECTORS:

Charles L. Bauer; James T. Diehl; Ford Elsaesser;
Curt Hecker; Ron Jones; Maggie Lyons;
John B. Parker; James Patrick; Michael J. Romine;
Jerrold B. Smith; Barbara Strickfaden

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	31,387
Interest-bearing balances	149
Securities:	
Held-to-maturity securities	11,324
Available-for-sale securities	158,791
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	6,565
Securities purchased under agreements to resell	3,872
Loans and lease financing receivables	
Loans and leases held for sale	3,872
Loans and leases, net of unearned income	768,567
LESS: Allowance for loan and lease losses	11,761
Loans and leases, net of unearned income and allowance	756,806
Trading assets	0
Premises and fixed assets (including capitalized leases)	19,844
Other real estate owned	1,682
Intangible assets:	
Goodwill	11,662
Other intangible assets	723
Other assets	25,018
Total assets	<u><u>1,027,823</u></u>
Deposits:	
In domestic offices:	760,911
Noninterest-bearing	162,136
Interest-bearing	598,775
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	124,127
Trading liabilities	0
Other borrowed money	29,000
Subordinated notes and debentures	0
Other liabilities	8,262
Total liabilities	<u>922,300</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	2,668
Surplus (exclude all surplus related to preferred stock)	57,968
Retained earnings	43,560
Accumulated other comprehensive income	1,327
Other equity capital components	0
Total equity capital	<u>105,523</u>
Total liabilities, minority interest, and equity capital	<u><u>1,027,823</u></u>

DECEMBER 31, 2007
SYRINGA BANK
BOISE, IDAHO
Charter No. 251
Charter Issued February 13, 1997
Incorporated March 8, 1996

OFFICERS:

President & Chief Executive Officer: Jerry F. Aldape
Chief Financial Officer: Jerry F. Aldape

DIRECTORS:

Hilario "Larry" J. Arguinchona;
Scott J. Chandler; Thomas B. Chandler; Don Deters;
Terry Hayden; Cheryl Larrabee; Harvey L. Neef;
Bruce C. Parker; Timothy D. Viehweg; Charles H. Wilson

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	5,366
Interest-bearing balances	106
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	17,415
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	3,485
Securities purchased under agreements to resell	1,058
Loans and lease financing receivables	
Loans and leases held for sale	1,058
Loans and leases, net of unearned income	257,066
LESS: Allowance for loan and lease losses	3,876
Loans and leases, net of unearned income and allowance	253,190
Trading assets	0
Premises and fixed assets (including capitalized leases)	2,042
Other real estate owned	0
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	3,309
Total assets	<u><u>285,971</u></u>
Deposits:	
In domestic offices:	209,906
Noninterest-bearing	31,104
Interest-bearing	178,803
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	0
Trading liabilities	0
Other borrowed money	32,180
Subordinated notes and debentures	0
Other liabilities	2,138
Total liabilities	<u>244,224</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	5,082
Surplus (exclude all surplus related to preferred stock)	34,196
Retained earnings	2,480
Accumulated other comprehensive income	-11
Other equity capital components	0
Total equity capital	<u>41,747</u>
Total liabilities, minority interest, and equity capital	<u><u>285,971</u></u>

DECEMBER 31, 2007
THE BANK OF COMMERCE
IDAHO FALLS, IDAHO
Charter No. 225
Charter Issued March 30, 1959
Incorporated March 30, 1959

OFFICERS:

President & Chief Executive Officer: Thomas J. Romrell
Chief Financial Officer: Ronald M. Johnson

DIRECTORS:

Richard N. Adams; Bradford C. Bowen;
Julian G. Cowley; Calvin Erb; John W. Erb;
Richard H. Groberg; William Reed

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	33,182
Interest-bearing balances	0
Securities:	
Held-to-maturity securities	74,048
Available-for-sale securities	79,731
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	54,296
Securities purchased under agreements to resell	0
Loans and lease financing receivables	
Loans and leases held for sale	0
Loans and leases, net of unearned income	481,504
LESS: Allowance for loan and lease losses	4,499
Loans and leases, net of unearned income and allowance	477,005
Trading assets	0
Premises and fixed assets (including capitalized leases)	12,367
Other real estate owned	0
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	11,711
Total assets	<u>742,340</u>
Deposits:	
In domestic offices:	620,907
Noninterest-bearing	173,398
Interest-bearing	447,509
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	0
Trading liabilities	0
Other borrowed money	0
Subordinated notes and debentures	0
Other liabilities	9,918
Total liabilities	<u>630,825</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	1,000
Surplus (exclude all surplus related to preferred stock)	29,200
Retained earnings	80,818
Accumulated other comprehensive income	497
Other equity capital components	0
Total equity capital	<u>111,515</u>
Total liabilities, minority interest, and equity capital	<u>742,340</u>

DECEMBER 31, 2007
UNITED BANK OF IDAHO
DRIGGS, IDAHO
Charter No. 260
Charter Issued July 16, 2006
Incorporated August 31, 2006

OFFICERS:

Chief Executive Officer: W. Richard Scarlett
President: Jerry W. Rankin
Chief Financial Officer: Brent M. Kroger

DIRECTORS:

Patty K. Cook; Stephen W. Hoopes;
John A. McKeller; Jerry W. Rankin;
W. Richard Scarlett

Cash and balances due from depository institutions	
Noninterest-bearing balances and currency and coin.	1,021
Interest-bearing balances	0
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	0
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	561
Securities purchased under agreements to resell	0
Loans and lease financing receivables	
Loans and leases held for sale	0
Loans and leases, net of unearned income	19,223
LESS: Allowance for loan and lease losses	229
Loans and leases, net of unearned income and allowance	18,994
Trading assets	0
Premises and fixed assets (including capitalized leases)	2,313
Other real estate owned	0
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	387
Total assets	23,515
Deposits:	
In domestic offices:	17,326
Noninterest-bearing	3,584
Interest-bearing	13,742
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	0
Trading liabilities	0
Other borrowed money	0
Subordinated notes and debentures	0
Other liabilities	132
Total liabilities	17,458
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	3,000
Surplus (exclude all surplus related to preferred stock)	1,500
Retained earnings	1,557
Accumulated other comprehensive income	0
Other equity capital components	0
Total equity capital	6,057
Total liabilities, minority interest, and equity capital	23,515

DECEMBER 31, 2007
THE IDAHO COMPANY
IDAHO FALLS, IDAHO
Charter No. 1
Incorporated November 28, 1986
BIDCO License Issued July 11, 1989

OFFICERS:

Chairman, President, & Chief Executive Officer:
 William F. Rigby

DIRECTORS:

Jeffrey Jones; John Rigby;
 William F. Rigby; Fred T. Thompson, Jr.;
 Shanon Taylor; Ronald Warnecke

	<u>(000's Omitted)</u>
<u>ASSETS</u>	
Cash	2
Loan Receivable.....	1,116
Less: Allowance for Loan Losses	93
Net Loans and Leases.....	1,023
Interest Receivable	111
Prepaid Expenses	6
Other Investments	528
Total Assets.....	<u>1,671</u>
 <u>LIABILITIES AND STOCKHOLDERS' EQUITY</u>	
Accounts Payable	1,000
Accrued Expenses	20
Notes Payable.....	397
Accrued Interest	33
Total Liabilities	<u>431</u>
 <u>STOCKHOLDERS' EQUITY</u>	
Common Stock.....	1,137
Retained Earnings	103
Total Stockholders' Equity.....	<u>1,240</u>
 Total Liabilities and Stockholders' Equity.....	 <u>1,671</u>

Financial Institutions Operating in Idaho⁵

Institution	Address	City	State
Ireland Bank	386 North Main	Aberdeen	ID
Wells Fargo Bank, National Association	165 South Main Street	Aberdeen	ID
Wells Fargo Bank, National Association	4630 West State Street	Ada County	ID
D. L. Evans Bank	Main and Market Streets	Albion	ID
Keybank National Association	290 Idaho Street	American	ID
The Bank of Commerce	590 Tyhee	American	ID
U.S. Bank National Association	588 Fort Hall Avenue	American	ID
Wells Fargo Bank, National Association	246 Idaho Street	American	ID
The Bank of Commerce	3113 South 25th East	Ammon	ID
Washington Mutual Bank	1711 S 25th Rd E	Ammon	ID
Zions First National Bank	2540 East Sunnyside Road	Ammon	ID
The Bank of Commerce	120 Grand Avenue	Arco	ID
Wells Fargo Bank, National Association	205 West Grand Avenue	Arco	ID
Bank of Idaho	600 Main Street	Ashton	ID
Keybank National Association	24 South 5th Street	Ashton	ID
First Bank of Idaho, FSB	731 N Main St	Bellevue	ID
U.S. Bank National Association	625 South Main Street	Bellevue	ID
Keybank National Association	15 North Ash Street	Blackfoot	ID
The Bank of Commerce	280 West Judicial	Blackfoot	ID
U.S. Bank National Association	9 South Ash Street	Blackfoot	ID
Washington Federal Savings and Loan Association	715 W Judicial	Blackfoot	ID
Wells Fargo Bank, National Association	109 South Broadway	Blackfoot	ID
Zions First National Bank	1350 Parkway Drive #1	Blackfoot	ID
Bank of America, National Association	1200 Main Street	Boise	ID
Bank of America, National Association	280 S. Capital Blvd.	Boise	ID
Bank of America, National Association	3563 South Federal Way	Boise	ID
Bank of America, National Association	421 North Cole Road	Boise	ID
Bank of America, National Association	9780 West Fairview Avenue	Boise	ID
Bank of the Cascades	121 N 9th Street, Suite 100	Boise	ID
Bank of the Cascades	209 North 12th Street	Boise	ID
Bank of the Cascades	6981 Overland Road	Boise	ID
Bank of the Cascades	801 South Vista Avenue	Boise	ID
Bank of the Cascades	Plaza 121 Office, 121 North 9th,	Boise	ID
Bank of the West	827 W Idaho Street	Boise	ID
Bank of the West	9140 West Emerald	Boise	ID
Banner Bank	1550 South Kimball Way	Boise	ID
Banner Bank	6850 Fairview Avenue	Boise	ID
Banner Bank	950 W. Bannock, Suite 100	Boise	ID
D. L. Evans Bank	1600 South Vista Avenue	Boise	ID
D. L. Evans Bank	213 N. 9th Street	Boise	ID
D. L. Evans Bank	3845 West State Street	Boise	ID
D. L. Evans Bank	7450 West Emerald St	Boise	ID
Home Federal Bank	10443 Fairview Ave.	Boise	ID
Home Federal Bank	1307 Maple Grove Rd	Boise	ID
Home Federal Bank	7319 W. State St.	Boise	ID
Home Federal Bank	800 W. State St.	Boise	ID
Home Federal Bank	8300 W. Overland Rd.	Boise	ID
Home Federal Bank	871 Parkcenter Blvd	Boise	ID
Idaho Banking Company	449 East Parkcenter Boulevard	Boise	ID
Idaho Banking Company	6010 Fairview Avenue	Boise	ID
Idaho Independent Bank	317 North 9th Street	Boise	ID
Idaho Independent Bank	317 North 9th Street	Boise	ID
Idaho Independent Bank	401 West Front Street	Boise	ID
Idaho Independent Bank	8351 West Overland Road	Boise	ID

⁵ Source: FDIC Summary of Deposits

Financial Institutions Operating in Idaho

Institution	Address	City	State
Idaho Trust National Bank	888 West Broad Street	Boise	ID
Keybank National Association	1111 Broadway Avenue	Boise	ID
Keybank National Association	3149 North Cole Road	Boise	ID
Keybank National Association	4920 Overland Street	Boise	ID
Keybank National Association	6700 West State Street	Boise	ID
Keybank National Association	702 West Idaho Street	Boise	ID
Keybank National Association	8157 West Fairview Avenue	Boise	ID
Keybank National Association	875 East Park Center Boulevard	Boise	ID
Mountain West Bank	433 North 16th Street	Boise	ID
Mountain West Bank	7107 West State Street	Boise	ID
Mountain West Bank	80 South Cole Road	Boise	ID
Mountain West Bank	800 West Bannock Street	Boise	ID
Sterling Savings Bank	420 W Main St	Boise	ID
Syringa Bank	1299 North Orchard	Boise	ID
Syringa Bank	999 Main Street, Suite 100	Boise	ID
U.S. Bank National Association	1000 Broadway Avenue	Boise	ID
U.S. Bank National Association	101 South Capitol Boulevard	Boise	ID
U.S. Bank National Association	10500 Overland Road	Boise	ID
U.S. Bank National Association	10541 Overland Road	Boise	ID
U.S. Bank National Association	10556 Fairview Avenue	Boise	ID
U.S. Bank National Association	10700 Ustick	Boise	ID
U.S. Bank National Association	1103 Vista Avenue	Boise	ID
U.S. Bank National Association	111 South 27th Street	Boise	ID
U.S. Bank National Association	1515 South Orchard	Boise	ID
U.S. Bank National Association	1688 State Street	Boise	ID
U.S. Bank National Association	205 North Tenth Street	Boise	ID
U.S. Bank National Association	2730 Airport Way	Boise	ID
U.S. Bank National Association	301 West Parkcenter Boulevard	Boise	ID
U.S. Bank National Association	3614 West State Street	Boise	ID
U.S. Bank National Association	4700 North Eagle Road	Boise	ID
U.S. Bank National Association	5312 Chinden Boulevard	Boise	ID
U.S. Bank National Association	6560 South Federal Way	Boise	ID
U.S. Bank National Association	7100 West State Street	Boise	ID
U.S. Bank National Association	7230 Fairview Avenue	Boise	ID
U.S. Bank National Association	8534 Franklin Road	Boise	ID
Washington Federal Savings and Loan Association	10 S Orchard	Boise	ID
Washington Federal Savings and Loan Association	1001 W Idaho St	Boise	ID
Washington Federal Savings and Loan Association	10150 Fairview Ave	Boise	ID
Washington Federal Savings and Loan Association	1789 Broadway Ave	Boise	ID
Washington Federal Savings and Loan Association	3197 N Cole Rd	Boise	ID
Washington Mutual Bank	2423 S Apple St	Boise	ID
Washington Mutual Bank	3527 Federal Way Se Ste A	Boise	ID
Washington Mutual Bank	3550 West State St	Boise	ID
Washington Mutual Bank	5120 West Franklin Rd	Boise	ID
Washington Mutual Bank	6490 S Federal Way	Boise	ID
Washington Mutual Bank FSB	10751 W Overland Road #d	Boise	ID
Washington Mutual Bank FSB	199 North Capitol Blvd Suite	Boise	ID
Washington Mutual Bank FSB	373 N Milwaukee St	Boise	ID
Washington Trust Bank	7802 West Overland Road	Boise	ID
Washington Trust Bank	7930 Fairview Avenue	Boise	ID
Washington Trust Bank	901 West Bannock Street	Boise	ID
Wells Fargo Bank, National Association	10342 Overland Road	Boise	ID
Wells Fargo Bank, National Association	1205 Broadway Avenue	Boise	ID
Wells Fargo Bank, National Association	1400 Vista Avenue	Boise	ID
Idaho Trust National Bank	888 West Broad Street	Boise	ID

Financial Institutions Operating in Idaho

Institution	Address	City	State
Wells Fargo Bank, National Association	3150 North Five Mile Road	Boise	ID
Wells Fargo Bank, National Association	421 North Orchard Avenue	Boise	ID
Wells Fargo Bank, National Association	4594 North Eagle Road	Boise	ID
Wells Fargo Bank, National Association	505 West Bannock Street	Boise	ID
Wells Fargo Bank, National Association	6788 Glenwood St	Boise	ID
Wells Fargo Bank, National Association	7700 Fairview Avenue	Boise	ID
Wells Fargo Bank, National Association	818 East Boise Avenue	Boise	ID
Wells Fargo Bank, National Association	848 West Main Street	Boise	ID
Wells Fargo Bank, National Association	877 West Main Street	Boise	ID
Western Capital Bank	1750 Front Street	Boise	ID
Zions First National Bank	6176 North Eagle	Boise	ID
Zions First National Bank	7402 Fairview Avenue	Boise	ID
Zions First National Bank	890 Main Street	Boise	ID
Mountain West Bank	7186 1st Street	Bonnors Ferry	ID
Panhandle State Bank	6750 Main	Bonnors Ferry	ID
Wells Fargo Bank, National Association	6764 Main Street	Bonnors Ferry	ID
First Federal Savings Bank of Twin Falls	123 Broadway Avenue North	Buhl	ID
The Farmers National Bank of Buhl	914 Main Street	Buhl	ID
U.S. Bank National Association	819 Main Street	Buhl	ID
Wells Fargo Bank, National Association	200 Broadway North	Buhl	ID
D. L. Evans Bank	2281 Overland Avenue	Burley	ID
D. L. Evans Bank	397 North Overland Avenue	Burley	ID
First Federal Savings Bank of Twin Falls	1095 East Main St	Burley	ID
First Federal Savings Bank of Twin Falls	2059 Overland Avenue	Burley	ID
Keybank National Association	1301 Overland Avenue	Burley	ID
U.S. Bank National Association	112 East Main Street	Burley	ID
Wells Fargo Bank, National Association	130 East Main Street	Burley	ID
Wells Fargo Bank, National Association	937 E. Main Street	Burley	ID
Zions First National Bank	102 West Main Street	Burley	ID
Bank of the Cascades	1110 Blaine	Caldwell	ID
Home Federal Bank	923 Dearborn St	Caldwell	ID
Idaho Independent Bank	620 S Kimball	Caldwell	ID
Keybank National Association	309 South 9th Street	Caldwell	ID
Panhandle State Bank	506 S 10th Avenue	Caldwell	ID
U.S. Bank National Association	607 Cleveland Boulevard	Caldwell	ID
Washington Federal Savings and Loan Association	515 Cleveland Blvd	Caldwell	ID
Washington Mutual Bank	1018 Blaine St	Caldwell	ID
Wells Fargo Bank, National Association	2500 Blaine St	Caldwell	ID
Wells Fargo Bank, National Association	5218 Cleveland Blvd	Caldwell	ID
Wells Fargo Bank, National Association	823 Cleveland Boulevard	Caldwell	ID
Zions First National Bank	509 South Kimball Ave.	Caldwell	ID
U.S. Bank National Association	95 North Superior Street	Cambridge	ID
Ireland Bank	20449 Main Street	Carey	ID
Sterling Savings Bank	101 South Main Street	Cascade	ID
Wells Fargo Bank, National Association	Fourth and Main	Challis	ID
AmericanWest Bank	223 W. Ironwood Drive	Coeur D Alene	ID
bankcda	1620 Northwest Boulevard,	Coeur D Alene	ID
bankcda	912 Northwest Boulevard	Coeur D Alene	ID
Idaho Independent Bank	1260 West Riverstone Drive	Coeur D Alene	ID
Idaho Trust National Bank	608 Northwest Blvd, Ste. 300	Coeur D Alene	ID
Inland Northwest Bank	30 West Prairie Avenue	Coeur D Alene	ID
Mountain West Bank	125 Ironwood Drive	Coeur D Alene	ID
Mountain West Bank	1715 W. Kathleen Avenue	Coeur D Alene	ID
Panhandle State Bank	200 W Neider Ave	Coeur D Alene	ID
Wells Fargo Bank, National Association	3150 North Five Mile Road	Boise	ID
Wells Fargo Bank, National Association	421 North Orchard Avenue	Boise	ID

Financial Institutions Operating in Idaho

Institution	Address	City	State
Panhandle State Bank	200 W. Neider Avenue	Coeur D Alene	ID
Sterling Savings Bank	1106 Sherman	Coeur D Alene	ID
Wells Fargo Bank, National Association	114 West Appleway	Coeur D Alene	ID
Wells Fargo Bank, National Association	2100 Northwest Boulevard	Coeur D Alene	ID
Wells Fargo Bank, National Association	230 W Ironwood Drive	Coeur D Alene	ID
Wells Fargo Bank, National Association	301 E Sherman Avenue	Coeur D Alene	ID
Bank of America, National Association	401 Front Avenue	Coeur D'alene	ID
Bank of America, National Association	West 357 Canfield	Coeur D'alene	ID
Bank of America, National Association	West 501 Appleway	Coeur D'alene	ID
Inland Northwest Bank	955 Ironwood Drive	Coeur D'alene	ID
Sterling Savings Bank	1233 Northwood Center Court	Coeur D'alene	ID
U.S. Bank National Association	1603 North Fourth Street	Coeur D'alene	ID
U.S. Bank National Association	302 Sherman Avenue	Coeur D'alene	ID
U.S. Bank National Association	6376 North Government Way	Coeur D'alene	ID
Washington Mutual Bank FSB	560 West Kathleen Suite A	Coeur D'alene	ID
Washington Trust Bank	218 Lakeside Street	Coeur D'alene	ID
U.S. Bank National Association	104 Main Street	Cottonwood	ID
Wells Fargo Bank, National Association	316 Main Street	Cottonwood	ID
U.S. Bank National Association	210 Illinois Avenue	Council	ID
Wells Fargo Bank, National Association	113 West Main Street	Craigmont	ID
Ireland Bank	Main and Center Streets	Downey	ID
First Bank of Idaho, FSB	200 South Main St	Driggs	ID
Keybank National Association	15 North Main Street	Driggs	ID
The Bank of Commerce	65 East Wallace	Driggs	ID
United Bank of Idaho	185 South Main Street	Driggs	ID
Bank of the Cascades	1101 E. Winding Creek Drive	Eagle	ID
Bank of the West	47 E. Riverside Drive	Eagle	ID
Home Federal Bank	100 E. Riverside Dr	Eagle	ID
Idaho Banking Company	402 South Eagle Road	Eagle	ID
Idaho Independent Bank	560 E. State Street	Eagle	ID
Keybank National Association	3314 East Chinden Boulevard	Eagle	ID
Mountain West Bank	1539 East Iron Eagle Drive	Eagle	ID
Syringa Bank	3172 E State St	Eagle	ID
U.S. Bank National Association	150 West State Street	Eagle	ID
U.S. Bank National Association	250 South Eagle Road	Eagle	ID
Washington Federal Savings and Loan Association	701 E State St	Eagle	ID
Washington Mutual Bank	468 Rivershore Lane	Eagle	ID
Wells Fargo Bank, National Association	498 East State Street	Eagle	ID
Home Federal Bank	250 S. Washington	Emmett	ID
Keybank National Association	1024 South Washington Avenue	Emmett	ID
U.S. Bank National Association	200 South Washington	Emmett	ID
Wells Fargo Bank, National Association	102 West Main Street	Emmett	ID
U.S. Bank National Association	512 Soldier Road	Fairfield	ID
U.S. Bank National Association	98 Highway 30	Filer	ID
Bank of the Cascades	1850 N. Whitley Drive	Fruitland	ID
Keybank National Association	16th and Whitley	Fruitland	ID
Panhandle State Bank	1710 North Whitley Drive Suite	Fruitland	ID
Zions First National Bank	909 NW 16th Street, Suite B	Fruitland	ID
Bank of the Cascades	4128 Adams Street	Garden City	ID
Washington Mutual Bank FSB	5425 Chinden Blvd	Garden City	ID
Washington Trust Bank	7309 N. State Street	Garden City	ID
Wells Fargo Bank, National Association	3301 W Chinden Boulevard	Garden City	ID
Wells Fargo Bank, National Association	102 E Walnut St	Genesee	ID
U.S. Bank National Association	102 East Idaho	Glenns Ferry	ID
Panhandle State Bank	200 W. Neider Avenue	Coeur D Alene	ID
Sterling Savings Bank	1106 Sherman	Coeur D Alene	ID

Financial Institutions Operating in Idaho

Institution	Address	City	State
Bank of America, National Association	645 Main St	Gooding	ID
Panhandle State Bank	746 Main Street	Gooding	ID
Wells Fargo Bank, National Association	445 Main Street	Gooding	ID
Zions First National Bank	502 Main Street	Gooding	ID
Ireland Bank	1 North Main	Grace	ID
U.S. Bank National Association	300 South Main Street	Grand View	ID
Sterling Savings Bank	147 West Main	Grangeville	ID
U.S. Bank National Association	104 East Main Street	Grangeville	ID
Wells Fargo Bank, National Association	162 East Main Street	Grangeville	ID
U.S. Bank National Association	111 West Hagerman Avenue	Hagerman	ID
Bank of America, National Association	215 N Main	Hailey	ID
D. L. Evans Bank	12 E. Bullion Street	Hailey	ID
First Bank of Idaho, FSB	314 N Main St	Hailey	ID
Mountain West Bank	206 N Main Street	Hailey	ID
Wells Fargo Bank, National Association	100 N Main Street	Hailey	ID
AmericanWest Bank	255 W. Hayden Avenue	Hayden	ID
bankcda	200 W. Honeysuckle Ave.	Hayden	ID
Mountain West Bank	305 West Prairie Avenue	Hayden	ID
Sterling Savings Bank	8060 N. Cornerstone Drive	Hayden	ID
Washington Trust Bank	8050 N. Government Way	Hayden	ID
Bank of America, National Association	162 W Hayden Avenue	Hayden Lake	ID
Idaho Independent Bank	8882 North Government Way	Hayden Lake	ID
U.S. Bank National Association	197 West Prairie Avenue	Hayden Lake	ID
Wells Fargo Bank, National Association	204 W Hayden Avenue	Hayden Lake	ID
U.S. Bank National Association	255 Main Street	Hazelton	ID
U.S. Bank National Association	112 South Main	Homedale	ID
Bank of America, National Association	110 North Holmes Avenue	Idaho Falls	ID
Bank of Idaho	1800 Channing Way	Idaho Falls	ID
Bank of Idaho	399 North Capital Avenue	Idaho Falls	ID
Citizens Community Bank	2797 South 25th East	Idaho Falls	ID
D. L. Evans Bank	888 East 17th Street	Idaho Falls	ID
Keybank National Association	1625 Northgate Mile	Idaho Falls	ID
Keybank National Association	2655 East 17th Street	Idaho Falls	ID
Keybank National Association	501 Broadway	Idaho Falls	ID
The Bank of Commerce	1455 Northgate Mile	Idaho Falls	ID
The Bank of Commerce	1730 W. Broadway	Idaho Falls	ID
The Bank of Commerce	1770 17th Street	Idaho Falls	ID
The Bank of Commerce	375 N Yellowstone Avenue	Idaho Falls	ID
U.S. Bank National Association	1555 West Broadway	Idaho Falls	ID
U.S. Bank National Association	330 Shoup Avenue	Idaho Falls	ID
U.S. Bank National Association	585 First Street	Idaho Falls	ID
Washington Federal Savings and Loan Association	500 N Capital	Idaho Falls	ID
Washington Mutual Bank FSB	1555 Northgate Mile Suite A	Idaho Falls	ID
Wells Fargo Bank, National Association	1798 Hitt Road	Idaho Falls	ID
Wells Fargo Bank, National Association	305 First Street	Idaho Falls	ID
Wells Fargo Bank, National Association	320 A Street	Idaho Falls	ID
Wells Fargo Bank, National Association	400 South Woodruff Avenue	Idaho Falls	ID
Wells Fargo Bank, National Association	576 E 17th St	Idaho Falls	ID
Wells Fargo Bank, National Association	635 North Skyline Drive	Idaho Falls	ID
Zions First National Bank	1235 South Utah Avenue	Idaho Falls	ID
Ireland Bank	Main Street and Highway 30	Inkom	ID
Bank of Idaho	4128 Lodgepole Drive	Island Park	ID
D. L. Evans Bank	1014 South Lincoln	Jerome	ID
First Federal Savings Bank of Twin Falls	1515 S Lincoln	Jerome	ID
Bank of America, National Association	645 Main St	Gooding	ID
Panhandle State Bank	746 Main Street	Gooding	ID

Financial Institutions Operating in Idaho

Institution	Address	City	State
The Farmers National Bank of Buhl	1441 South Lincoln	Jerome	ID
U.S. Bank National Association	300 South Lincoln	Jerome	ID
Washington Federal Savings and Loan Association	140 E Main St	Jerome	ID
Wells Fargo Bank, National Association	100 East Main Street	Jerome	ID
Wells Fargo Bank, National Association	320 Idaho Street	Kamiah	ID
AmericanWest Bank	120 Railroad Ave	Kellogg	ID
Panhandle State Bank	302 W. Cameron Avenue	Kellogg	ID
U.S. Bank National Association	7 Mckinley Avenue	Kellogg	ID
Wells Fargo Bank, National Association	100 Mckinley Avenue	Kellogg	ID
Wells Fargo Bank, National Association	202 West Cameron Ave	Kellogg	ID
Wells Fargo Bank, National Association	501 E Main Street	Kendrick	ID
Bank of America, National Association	311 Main St	Ketchum	ID
Bank of the West	600 Sun Valley Road	Ketchum	ID
D. L. Evans Bank	680 Sun Valley Road	Ketchum	ID
First Bank of Idaho, FSB	111 Main St	Ketchum	ID
Idaho Independent Bank	180 First Street West, Unit 103	Ketchum	ID
Mountain West Bank	491 Sun Valley Road East	Ketchum	ID
U.S. Bank National Association	191 Sun Valley Road	Ketchum	ID
Wells Fargo Bank, National Association	600 Sun Valley Road	Ketchum	ID
Zions First National Bank	291 Washington Ave.	Ketchum	ID
First Federal Savings Bank of Twin Falls	22349 Kimberly Rd	Kimberly	ID
Wells Fargo Bank, National Association	242 Main Street North	Kimberly	ID
Sterling Savings Bank	001 Main Street	Kooskia	ID
Bank of the Cascades	840 E. Avalon Street	Kuna	ID
U.S. Bank National Association	485 West Third Street	Kuna	ID
Ireland Bank	110 Main Street	Lava Hot	ID
AmericanWest Bank	2201 Thain Grade	Lewiston	ID
Banner Bank	1031 21st Street	Lewiston	ID
Banner Bank	639 Bryden Avenue	Lewiston	ID
Sterling Savings Bank	2250 Thain Grade Road	Lewiston	ID
Sterling Savings Bank	444 Thain Road	Lewiston	ID
Sterling Savings Bank	921 F Street	Lewiston	ID
Syringa Bank	1005 Bryden	Lewiston	ID
Syringa Bank	1702 21st Street, Suite 113 &	Lewiston	ID
Twin River National Bank	1507 G Street	Lewiston	ID
Twin River National Bank	3330 10th Street	Lewiston	ID
U.S. Bank National Association	1900 19th Avenue	Lewiston	ID
U.S. Bank National Association	835 Main Street	Lewiston	ID
Wells Fargo Bank, National Association	303 Thain Rd	Lewiston	ID
Wells Fargo Bank, National Association	868 Main Street	Lewiston	ID
Zions First National Bank	623 Main Street	Lewiston	ID
Zions First National Bank	3506 12th Street	Lewiston	ID
Ireland Bank	208 S Main Street	Mackay	ID
U.S. Bank National Association	202 South Main Street	Mackay	ID
Ireland Bank	33 Bannock Street	Malad City	ID
U.S. Bank National Association	25 East 50 South	Malad City	ID
U.S. Bank National Association	445 Main Street	Marsing	ID
Idaho First Bank	475 E. Deinhard Lane	Mccall	ID
Sterling Savings Bank	900 Second Street	Mccall	ID
U.S. Bank National Association	905 North Second Street	Mccall	ID
Washington Federal Savings and Loan Association	204 E Park St	Mccall	ID
Zions First National Bank	114 North 3rd Street, Suite F	Mccall	ID
Bank of the Cascades	30 E Broadway Avenue	Meridian	ID
Bank of the Cascades	3135 East Overland Road	Meridian	ID
The Farmers National Bank of Buhl	1441 South Lincoln	Jerome	ID
U.S. Bank National Association	300 South Lincoln	Jerome	ID

Financial Institutions Operating in Idaho

Institution	Address	City	State
Bank of the West	1630 S. Wells Avenue	Meridian	ID
Banner Bank	900 East Fairview Avenue	Meridian	ID
D. L. Evans Bank	2560 East Fairview Avenue	Meridian	ID
Home Federal Bank	4051 E. Fairview Ave.	Meridian	ID
Home Federal Bank	55 E. Franklin Rd.	Meridian	ID
Idaho Banking Company	1875 S. Eagle Rd.	Meridian	ID
Idaho Independent Bank	113 East Idaho	Meridian	ID
Keybank National Association	1650 East Fairview Avenue	Meridian	ID
Keybank National Association	3055 East Overland Road	Meridian	ID
Mountain West Bank	2970 East Saint Lukes Drive	Meridian	ID
Mountain West Bank	4250 Fairview Avenue East	Meridian	ID
Sterling Savings Bank	1595 S. Eagle Road	Meridian	ID
Syringa Bank	3671 East Fairview Avenue	Meridian	ID
U.S. Bank National Association	20 East Fairview Avenue	Meridian	ID
U.S. Bank National Association	220 West Cherry Lane	Meridian	ID
U.S. Bank National Association	3301 West Cherry Lane	Meridian	ID
Washington Federal Savings and Loan Association	713 N Main St	Meridian	ID
Washington Mutual Bank FSB	1850 E Fairview Ave	Meridian	ID
Washington Trust Bank	3251 East Presidential Drive	Meridian	ID
Washington Trust Bank	4037 East Clocktower Lane, #12	Meridian	ID
Wells Fargo Bank, National Association	1682 N Main Street	Meridian	ID
Wells Fargo Bank, National Association	210 East Corporate Drive	Meridian	ID
Zions First National Bank	3715 East Overland Road	Meridian	ID
Syringa Bank	1028 W. Main Street	Middleton	ID
Ireland Bank	420 North Fourth Street	Montpelier	ID
U.S. Bank National Association	672 Washington	Montpelier	ID
Wells Fargo Bank, National Association	830 Washington Street	Montpelier	ID
Zions First National Bank	902 Washington Street	Montpelier	ID
AmericanWest Bank	600 South Jackson	Moscow	ID
Sterling Savings Bank	201 South Jackson Street	Moscow	ID
Sterling Savings Bank	609 South Washington	Moscow	ID
U.S. Bank National Association	1314 South Blaine Street	Moscow	ID
U.S. Bank National Association	301 South Main	Moscow	ID
Washington Mutual Bank FSB	1790 W Pullman Road	Moscow	ID
Wells Fargo Bank, National Association	1313 South Blaine St	Moscow	ID
Wells Fargo Bank, National Association	221 South Main Street	Moscow	ID
Zions First National Bank	105 South Main Street	Moscow	ID
Home Federal Bank	400 N. 3rd East	Mountain	ID
Idaho Independent Bank	310 American Legion Boulevard	Mountain	ID
U.S. Bank National Association	305 North Second East	Mountain	ID
Washington Mutual Bank	290 N Second E	Mountain	ID
Wells Fargo Bank, National Association	210 East Jackson Street	Mountain	ID
Wells Fargo Bank, National Association	415 Rosewood Ave	Mountain	ID
The Bank of Commerce	110 Main Street	Mud Lake	ID
Bank of America, National Association	1460 Caldwell Boulevard	Nampa	ID
Bank of the Cascades	112 2nd Street South	Nampa	ID
Bank of the Cascades	1513 12th Ave. Rd.	Nampa	ID
Bank of the West	1313 Caldwell Boulevard	Nampa	ID
Banner Bank	16292 N. Marketplace	Nampa	ID
D. L. Evans Bank	1536 Caldwell Boulevard	Nampa	ID
D. L. Evans Bank	2071 12th Avenue Road	Nampa	ID
Home Federal Bank	1820 Caldwell Blvd.	Nampa	ID
Home Federal Bank	2100 12th Avenue Rd.	Nampa	ID
Home Federal Bank	500 12th Ave S.	Nampa	ID
Bank of the West	1630 S. Wells Avenue	Meridian	ID
Banner Bank	900 East Fairview Avenue	Meridian	ID

Financial Institutions Operating in Idaho

Institution	Address	City	State
Home Federal Bank	5875 E. Franklin Road	Nampa	ID
Idaho Independent Bank	804 12th Avenue South	Nampa	ID
Keybank National Association	1020 Caldwell Boulevard	Nampa	ID
Keybank National Association	324 12th Avenue South	Nampa	ID
Mountain West Bank	1223 12th Avenue Road	Nampa	ID
Mountain West Bank	2024 Caldwell Boulevard	Nampa	ID
Panhandle State Bank	521 12th Avenue, South	Nampa	ID
U.S. Bank National Association	1112 First Street South	Nampa	ID
U.S. Bank National Association	1515 Caldwell Boulevard	Nampa	ID
U.S. Bank National Association	2400 12th Avenue Road	Nampa	ID
Washington Federal Savings and Loan Association	223 11th Ave S	Nampa	ID
Washington Mutual Bank	164 E Maine Ave	Nampa	ID
Washington Mutual Bank FSB	50 2nd St S	Nampa	ID
Washington Trust Bank	2200 North Cassia Street	Nampa	ID
Wells Fargo Bank, National Association	103 12th Avenue South	Nampa	ID
Wells Fargo Bank, National Association	1401 Twelfth Avenue S	Nampa	ID
Wells Fargo Bank, National Association	2122 W. Karcher Road	Nampa	ID
Wells Fargo Bank, National Association	5607 East Franklin Road	Nampa	ID
Zions First National Bank	2121 W. Karcher Road	Nampa	ID
Sterling Savings Bank	308 Virginia Avenue	New Meadows	ID
Zions First National Bank	130 Plymouth Avenue, North	New Plymouth	ID
U.S. Bank National Association	410 Oak Street	Nezperce	ID
AmericanWest Bank	100 Main Street	Orofino	ID
U.S. Bank National Association	333 Michigan Avenue	Orofino	ID
Wells Fargo Bank, National Association	210 Michigan Avenue	Orofino	ID
Bank of America, National Association	733 E. Mullen Avenue	Osburn	ID
Wells Fargo Bank, National Association	730 E Mullen Avenue	Osburn	ID
U.S. Bank National Association	Third and Grove Streets	Parma	ID
Wells Fargo Bank, National Association	202 E. Grove Street	Parma	ID
Keybank National Association	108 East Ellis	Paul	ID
Bank of America, National Association	102 South Main Street	Payette	ID
Panhandle State Bank	175 N. 16th Street	Payette	ID
U.S. Bank National Association	101 South Main Street	Payette	ID
Wells Fargo Bank, National Association	2 South Main Street	Payette	ID
U.S. Bank National Association	1 Country Club Lane	Pinehurst	ID
Sterling Savings Bank	365 10th and D Street	Plummer	ID
Bank of America, National Association	860 Yellowstone Avenue	Pocatello	ID
Bank of Idaho	1230 Yellowstone Avenue	Pocatello	ID
Bank of Idaho	2300 Via Caporatti Drive	Pocatello	ID
Citizens Community Bank	2000 Flandro Drive	Pocatello	ID
Citizens Community Bank	280 South Arthur Avenue	Pocatello	ID
Citizens Community Bank	280 South Arthur Avenue	Pocatello	ID
D. L. Evans Bank	333 Yellowstone Avenue	Pocatello	ID
D. L. Evans Bank	4080 Yellowstone Avenue	Pocatello	ID
Ireland Bank	2715 Poleline Road	Pocatello	ID
Ireland Bank	486 Yellowstone Avenue	Pocatello	ID
Keybank National Association	105 North Arthur Street	Pocatello	ID
Keybank National Association	4750 Yellowstone	Pocatello	ID
Keybank National Association	910 Yellowstone Avenue	Pocatello	ID
U.S. Bank National Association	120 North Arthur	Pocatello	ID
U.S. Bank National Association	855 Yellowstone	Pocatello	ID
Washington Federal Savings and Loan Association	1045 Yellowstone Ave	Pocatello	ID
Washington Mutual Bank	800 Yellowstone Ave Ste A	Pocatello	ID
Wells Fargo Bank, National Association	333 South Main Street	Pocatello	ID
Home Federal Bank	5875 E. Franklin Road	Nampa	ID
Idaho Independent Bank	804 12th Avenue South	Nampa	ID

Financial Institutions Operating in Idaho

Institution	Address	City	State
Wells Fargo Bank, National Association	4195 Yellowstone Ave	Pocatello	ID
Wells Fargo Bank, National Association	751 East Clark Street	Pocatello	ID
Wells Fargo Bank, National Association	950 Yellowstone Avenue	Pocatello	ID
Zions First National Bank	1590 Yellowstone	Pocatello	ID
Zions First National Bank	253 South Main Street	Pocatello	ID
Mountain West Bank	476655 Highway 95 North	Ponderay	ID
Panhandle State Bank	300 Kootenai Cutoff Road	Ponderay	ID
Bank of America, National Association	405 E. Seltice	Post Falls	ID
Community 1st Bank	707 North Post Street	Post Falls	ID
Inland Northwest Bank	1729 East Seltice Way	Post Falls	ID
Mountain West Bank	709 East Seltice Way	Post Falls	ID
Panhandle State Bank	3235 E Mullan Ave	Post Falls	ID
U.S. Bank National Association	East 415 Seltice Way	Post Falls	ID
Washington Mutual Bank	3134 E Mullan Ave Ste A	Post Falls	ID
Washington Trust Bank	East 1601 Seltice Way	Post Falls	ID
Wells Fargo Bank, National Association	701 Goude Street	Post Falls	ID
U.S. Bank National Association	200 Sixth and Pine Street	Potlatch	ID
Ireland Bank	85 East Oneida	Preston	ID
Lewiston State Bank	217 South State	Preston	ID
U.S. Bank National Association	1 South State	Preston	ID
Wells Fargo Bank, National Association	5 N State Street	Preston	ID
Panhandle State Bank	6568 Hwy 2	Priest River	ID
U.S. Bank National Association	102 Treat Street	Priest River	ID
Wells Fargo Bank, National Association	U.S. Highway # 2	Priest River	ID
Panhandle State Bank	662 Commercial Park Avenue	Rathdrum	ID
Washington Trust Bank	16102 Highway 41	Rathdrum	ID
Wells Fargo Bank, National Association	16234 North Highway 41	Rathdrum	ID
Wells Fargo Bank, National Association	Highway 41	Rathdrum	ID
Citizens Community Bank	452 North 2nd East	Rexburg	ID
Keybank National Association	110 East Main Street	Rexburg	ID
The Bank of Commerce	184 East 200 North Street	Rexburg	ID
U.S. Bank National Association	77 East Main	Rexburg	ID
Washington Federal Savings and Loan Association	80 N 2nd E	Rexburg	ID
Wells Fargo Bank, National Association	39 East Main Street	Rexburg	ID
Zions First National Bank	149 West Main Street	Rexburg	ID
The Bank of Commerce	463 Rigby Lake Dr	Rigby	ID
U.S. Bank National Association	183 South State	Rigby	ID
Wells Fargo Bank, National Association	127 North State Street	Rigby	ID
Zions First National Bank	219 East Main Street	Rigby	ID
Sterling Savings Bank	402 South Main Street	Riggins	ID
The Bank of Commerce	386 Main Street	Ririe	ID
D. L. Evans Bank	418 South Oneida	Rupert	ID
First Federal Savings Bank of Twin Falls	701 Seventh	Rupert	ID
U.S. Bank National Association	612 Fifth Street	Rupert	ID
Wells Fargo Bank, National Association	602 East Street	Rupert	ID
Bank of Idaho	135 N. Bridge Street	Saint Anthony	ID
AmericanWest Bank	109 College	Saint Maries	ID
AmericanWest Bank	1500 Main	Saint Maries	ID
U.S. Bank National Association	138 North Eighth Street	Saint Maries	ID
Bank of America, National Association	603 Shoup St	Salmon	ID
U.S. Bank National Association	501 Main Street	Salmon	ID
Wells Fargo Bank, National Association	116 N Andrews St	Salmon	ID
AmericanWest Bank	605 5th Avenue	Sandpoint	ID
Bank of America, National Association	405 North Second Avenue	Sandpoint	ID
Wells Fargo Bank, National Association	4195 Yellowstone Ave	Pocatello	ID
Wells Fargo Bank, National Association	751 East Clark Street	Pocatello	ID

Financial Institutions Operating in Idaho

Institution	Address	City	State
Mountain West Bank	201 East Superior Street, Suite A	Sandpoint	ID
Panhandle State Bank	231 N. Third Ave	Sandpoint	ID
Panhandle State Bank	414 Church Street	Sandpoint	ID
U.S. Bank National Association	201 Main Street	Sandpoint	ID
Washington Trust Bank	515 Pine Street, Suite D	Sandpoint	ID
Wells Fargo Bank, National Association	320 North Fourth Avenue	Sandpoint	ID
The Bank of Commerce	270 South Emerson	Shelley	ID
U.S. Bank National Association	201 West Pine Street	Shelley	ID
Wells Fargo Bank, National Association	103 South Birch St	Shoshone	ID
Ireland Bank	98 West Second South	Soda Springs	ID
U.S. Bank National Association	189 South Main	Soda Springs	ID
Inland Northwest Bank	31845 North 5th Avenue	Spirit Lake	ID
Keybank National Association	30 West Main	St. Anthony	ID
Wells Fargo Bank, National Association	40 South Bridge Street	St. Anthony	ID
Wells Fargo Bank, National Association	729 Main Avenue	St. Maries	ID
Idaho Independent Bank	90 South Star Road	Star	ID
Wells Fargo Bank, National Association	Boardwalk Mall	Sun Valley	ID
Sterling Savings Bank	424 South Main Street	Troy	ID
Bank of America, National Association	1040 Shoshone Drive	Twin Falls	ID
Banner Bank	1340 Blue Lakes Boulevard	Twin Falls	ID
D. L. Evans Bank	215 Blue Lakes Boulevard North	Twin Falls	ID
D. L. Evans Bank	222 Main Avenue, South	Twin Falls	ID
D. L. Evans Bank	906 Blue Lakes Blvd North	Twin Falls	ID
First Federal Savings Bank of Twin Falls	110 Falls Avenue	Twin Falls	ID
First Federal Savings Bank of Twin Falls	148 Eastland Dr	Twin Falls	ID
First Federal Savings Bank of Twin Falls	383 Shoshone Street North	Twin Falls	ID
First Federal Savings Bank of Twin Falls	886 Blue Lakes Blvd North	Twin Falls	ID
Keybank National Association	103 Main Avenue, E.	Twin Falls	ID
Keybank National Association	1665 Blue Lakes Boulevard	Twin Falls	ID
Panhandle State Bank	113 Main Avenue West	Twin Falls	ID
Panhandle State Bank	1715 Poleline Road East	Twin Falls	ID
The Farmers National Bank of Buhl	1097 Blue Lakes Boulevard	Twin Falls	ID
The Farmers National Bank of Buhl	341 Pole Line Road	Twin Falls	ID
The Farmers National Bank of Buhl	890 Shoshone Street	Twin Falls	ID
U.S. Bank National Association	241 Shoshone Street North	Twin Falls	ID
U.S. Bank National Association	748 Blue Lakes Boulevard North	Twin Falls	ID
Washington Federal Savings and Loan Association	494 Blue Lake Blvd N	Twin Falls	ID
Washington Mutual Bank FSB	705 Blue Lakes Blvd N Suite G	Twin Falls	ID
Wells Fargo Bank, National Association	102 Main Avenue South	Twin Falls	ID
Wells Fargo Bank, National Association	1303 Addison Avenue East	Twin Falls	ID
Wells Fargo Bank, National Association	1329 Filer Avenue, East	Twin Falls	ID
Wells Fargo Bank, National Association	1864 Blue Lakes Boulevard	Twin Falls	ID
Zions First National Bank	1863 Blue Lakes Blvd. North	Twin Falls	ID
Zions First National Bank	1913 Addison Avenue	Twin Falls	ID
First Bank of Idaho, FSB	138 N Main St	Victor	ID
AmericanWest Bank	806 Bank St.	Wallace	ID
U.S. Bank National Association	528 Cedar Street	Wallace	ID
Wells Fargo Bank, National Association	419 Sixth Street	Wallace	ID
Bank of the West	34 East Main Street	Weiser	ID
Panhandle State Bank	440 E. Main Street	Weiser	ID
Wells Fargo Bank, National Association	407 State Street	Weiser	ID
Zions First National Bank	606 State Street	Weiser	ID
The Farmers National Bank of Buhl	Main and Idaho Streets	Wendell	ID
U.S. Bank National Association	15 South Idaho Street	Wendell	ID
Zions First National Bank	315 Avenue A	Wilder	ID

STATE OF IDAHO
STATE-CHARTERED CREDIT UNIONS
COMPARATIVE STATEMENT
Close of Business 12/31/07 and 12/31/06

	2007	2006	%
			Change
<u>ASSETS</u>			
Cash and Cash Equivalents	127,257,517	\$130,193,099	-2.25%
Unsecured Credit Cards	46,119,902	45,218,747	1.99%
All Other Unsecured Loans	23,884,537	19,906,779	19.98%
New Auto Loans	277,485,828	271,727,854	2.12%
Used Auto Loans	370,754,122	339,805,387	9.11%
First Mortgage Real Estate Loans	364,375,732	319,416,431	14.08%
Other Real Estate Loans	103,677,964	69,615,808	48.93%
Other Loans (Includes Loans Held for Sales)	116,590,389	109,447,722	6.53%
Total Loans	\$1,302,888,474	\$1,175,138,728	10.87%
Less: Allowance for Loan and Lease Losses	-4,303,647	-4,392,813	-2.03%
Loans Held For Sale	2,209,860	0	100.00%
Available for Sale Securities	25,828,622	30,239,608	-14.59%
Held-to Maturity	12,387,759	10,082,346	22.87%
Deposits in Commercial Banks, Savings & Loans, Savings Banks	26,892,673	14,539,716	84.96%
Loans to, Deposits in, and Investments in Natural Person Credit Unions	3,481,080	0	100.00%
Membership Capital and Paid-in Capital at Corporate Credit Unions	9,818,813	11,081,947	-11.40%
All Other Investments in Corporate Credit Unions	117,476,479	121,685,488	-3.46%
All Other Investments	4,928,116	10,166,537	-51.53%
Total Investments	\$200,813,542	\$197,795,642	1.53%
Other Real Estate Owned	0	587,837	100.00%
Land and Building (Net of Dep)	61,575,880	56,598,361	8.79%
Other Fixed Assets	11,553,103	7,617,040	51.67%
Shares Insurance Capitalization Deposit	12,226,033	10,491,612	16.53%
Other Assets	15,716,249	12,951,410	21.35%
Total Other Assets	\$101,071,265	\$88,246,260	14.53%
TOTAL ASSETS	\$1,729,937,011	\$1,586,980,916	9.01%
<u>LIABILITIES, SHARES AND EQUITY</u>			
Promissory and other Notes Payable	8,228,602	6,884,347	19.53%
Dividends / Interest Payable	5,821,681	4,915,460	18.44%
Accounts Payable & Liabilities	13,896,518	14,608,083	-4.87%
Total Liabilities	\$27,946,801	\$26,407,890	5.83%
Share Drafts	227,241,314	229,375,536	-0.93%
Regular Shares	352,002,487	363,231,276	-3.09%
All Other Shares and Deposits	960,946,709	825,463,650	16.41%
Total Shares And Deposits	\$1,540,190,510	\$1,418,070,462	8.61%
Undivided Earnings	108,896,974	95,365,678	14.19%
Regular Reserves	52,284,610	46,939,259	11.39%
Other Reserves	829,119	843,117	-1.66%
Unrealized Gain/Loss A-F-S SEC	-99,650	-645,490	-84.56%
Other Comprehensive Income	-111,353	0	100.00%
Total Equity	\$161,799,700	\$142,502,564	13.54%
Total Savings And Equity	\$1,701,990,210	\$1,560,573,026	9.06%
TOTAL LIABILITIES AND EQUITY	\$1,729,937,011	\$1,586,980,916	9.01%

**STATE OF IDAHO
STATE-CHARTERED CREDIT UNIONS
TOTAL ASSETS**

Name	City	State	12/31/2007	12/31/2006	% Change
<u>Idaho State-Chartered Credit Unions</u>					
Boise Fire Department Credit Union	Boise	ID	5,558,388	5,386,661	3.19%
Boise Valley Credit Union	Boise	ID	764,254	774,745	-1.35%
Cassia County Education Association Credit Union	Burley	ID	2,953,958	2,981,847	-0.94%
Clearwater Credit Union	Lewiston	ID	23,013,603	24,786,980	-7.15%
Cornerstone Union	Caldwell	ID	23,032,700	23,055,930	-0.10%
E.S.A. Credit Union	Boise	ID	5,858,536	5,944,352	-1.44%
East Idaho Credit Union	Idaho Falls	ID	192,394,473	178,112,180	8.02%
Health Care Idaho Credit Union	Boise	ID	8,409,296	8,641,494	-2.69%
Idadiv Credit Union	Nampa	ID	42,939,179	40,305,945	6.53%
Idaho Advantage Credit Union	Boise	ID	40,746,905	0	100.00%
Idaho Central Credit Union	Pocatello	ID	622,612,263	578,588,582	7.61%
Idaho Falls Teachers Credit Union	Idaho Falls	ID	13,431,053	13,356,277	0.56%
Idaho United Credit Union	Boise	ID	19,931,915	20,758,172	-3.98%
Inkom Cement Workers Credit Union	Inkom	ID	1,486,397	1,636,752	-9.19%
Jefferson County Public Employees Credit Union	Menan	ID	436,352	521,143	-16.27%
Kamiah Community Credit Union	Kamiah	ID	24,195,267	22,178,701	9.09%
Lewis Clark Credit Union	Lewiston	ID	33,110,316	26,607,646	24.44%
Lewiston Catholic Credit Union	Lewiston	ID	388,580	495,416	-21.56%
M.A.P. Credit Union	Burley	ID	1,658,825	1,487,194	11.54%
Members Preferred Credit Union	Idaho Falls	ID	29,615,924	30,256,432	-2.12%
Mini-Cassia Employees Credit Union	Burley	ID	549,047	596,020	-7.88%
Mountain View	Nampa	ID	15,519,690	14,861,921	4.43%
Northwest Christian Credit Union	Nampa	ID	28,162,617	27,420,572	2.71%
Payette River Credit Union	Emmett	ID	6,430,190	5,929,684	8.44%
Pine Tree Credit Union	Grangeville	ID	20,531,013	21,107,131	-2.73%
Pocahy Family Credit Union	Pocatello	ID	13,128,743	12,758,469	2.90%
Pocatello Simplot Credit Union	Pocatello	ID	32,397,860	32,694,405	-0.91%
Potelco United Credit Union	Pocatello	ID	56,221,224	50,324,844	11.72%
Public Employees	Coeur d'Alene	ID	7,925,313	8,366,747	-5.28%
Shell-Fir Credit Union	Shelley	ID	913,130	939,851	-2.84%
Shoshone County School Employees Credit Union	Wardner	ID	850,387	900,401	-5.55%
SIMCOE Credit Union	Burley	ID	5,056,816	4,994,896	1.24%
Simplot Employees Credit Union	Caldwell	ID	17,838,445	19,251,541	-7.34%
St. Joe Valley Credit Union	St. Maries	ID	7,678,772	7,629,241	0.65%
St. Alphonsus Medical Credit Union	Boise	ID	6,244,113	5,069,059	23.18%
Times- News Employees Credit Union	Twin Falls	ID	185,338	183,273	1.13%
Tribune Credit Union	Lewiston	ID	695,678	708,591	-1.82%
Valley Credit Union	Nampa	ID	9,831,664	9,201,401	6.85%
Westmark Credit Union	Idaho Falls	ID	400,235,609	371,836,586	7.64%
White Pine Credit Union	Pierce	ID	7,003,178	6,316,279	10.88%
Total Idaho State-Chartered Credit Unions			1,729,937,011	1,586,967,361	9.01%
<u>Other State-Chartered Credit Unions Operating in Idaho</u>					
Global Credit Union	Spokane	WA	40,805,242	72,043,420	-43.36%
Horizon Credit Union	Spokane	WA	69,949,322	66,834,795	4.66%
Numerica Credit Union	Spokane	WA	48,376,504	77,793,476	-37.81%
Spokane Teachers Credit Union	Spokane	WA	19,217,899	0	100.00%
Silverado Credit Union	Angwin	CA	993,849	521,869	90.44%
Total Other State-Chartered Credit Unions			179,342,816	217,193,560	-17.43%
Total State-Chartered Credit Unions			1,909,279,827	1,804,160,921	5.83%

SECURITIES BUREAU SANCTIONS REPORT

I. CIVIL ENFORCEMENT ACTIONS INITIATED OR COMPLETED UNDER THE IDAHO SECURITIES ACT/UNIFORM SECURITIES ACT

December 10, 2007
And July 15, 2008

MICHAEL J. BREINHOLT; STREAMLINE FINANCIAL LLC; FOUR SEASONS FINANCIAL LLC; Boise, ID; The Department filed a lawsuit alleging that the defendants offered and sold unregistered promissory notes to Idaho investors and that misrepresentations and omissions of material facts occurred in connection with the offer and sale of the notes. The Department alleged that the investment was misrepresented as risk free and that investment returns were generated through “hard lending” practices when most of the funds were directed to Annuity Coeptis, LLC in Cedar City, Utah.

On July 15, 2008, the Court entered a Judgment and Permanent Injunction against Mr. Breinholt, Streamline Financial, LLC and Four Seasons Financial, LLC. Breinholt and his companies consented to the entry of a Judgment and Permanent Injunction, admitting that they had a) made false and misleading representations to prospective investors, b) failed to disclose material facts to prospective investors, and c) sold unregistered securities in violation of Idaho law. While a \$5 million money judgment was entered, Mr. Breinholt has agreed to make nominal payments toward the judgment, while cooperating in further actions against other parties that benefited from the illegally raised funds.

September 11, 2008
And December 3, 2008

TERRY DEEBLE, Meridian, ID; GABRIEL JOSEPH; ANNUITY COEPTIS, LLC, Cedar City, UT – In connection with the preceding action involving Michael Breinholt, the complaint was amended to include these defendants on September 11, 2008.

On December 3, 2008, and after failing to defend themselves against the Department’s action, Gabriel Joseph and his company Annuity Coeptis, LLC were ordered to return more than \$2.4 million when the Court found that these defendants received funds through unlawful and fraudulent transactions as alleged in the State’s amended complaint. The Court found that Mr. Joseph and his company would be unjustly enriched if allowed to retain these proceeds.

Terry Deeble stipulated to a Judgment and Permanent Injunction in connection with his actions as a sales agent for Streamline Financial

and Mr. Breinholt. Deeble admitted to acting as an unregistered sales agent and agreed to a money judgment in the amount of \$73,000.

February 13, 2008
and August 19, 2008

TODD WATTS, Nampa, ID; VOHN WATTS, Star, ID; CAPITAL VENTURES, LLC, Meridian, ID - The Department filed a civil lawsuit which alleged that the defendants raised more than \$6.2 million and offered rates of return in excess of 30 percent annually, with the proceeds being forwarded to other out-of-state enterprises. The defendants allegedly offered and sold unregistered, high-yield securities to Idaho investors, and misrepresentations and omissions of material facts occurred in connection with the offer and sale of these high yield investments.

The litigation revealed that the defendants raised about \$7 million from more than 50 Idaho individuals and entities and that they were able to repay about \$2 million to investors. The defendants consented to the entry of a Judgment and Permanent Injunction, admitting that they had made false and misleading representations to prospective investors, failed to disclose material facts to prospective investors, failed to register as securities broker-dealers, and sold unregistered securities in violation of Idaho law.

August 28, 2008 and
September 23, 2008

JACK LEE SMILEY, Coeur d'Alene, ID – During April 2007, the Department filed a civil lawsuit against Smiley alleging violations of the Idaho Commodity Code and violating a previous Order issued by the Department. The earlier Order had directed Smiley to cease his activities involving Iraqi currency. The complaint was later amended to include allegations that Smiley violated the registration and anti-fraud provisions of the Idaho Uniform Securities Act.

The Department's complaint alleged that Smiley continued to sell his foreign currency investments in violation of the Idaho Commodity Code, the Idaho Uniform Securities Act and the previously issued Cease and Desist Order. Investors are alleged to have been told that they would realize at least 33 times their investment amount when the Iraqi currency hit the world markets.

On August 28, 2008 the Court found that summary judgment was appropriate as to each charge made by the State, including findings that Smiley made material misrepresentations and omitted to provide investors with important information as required by Idaho law. It was noted in the decision that the misrepresentations and omissions “are so obviously important to the investors that reasonable minds could not differ as to materiality.”

On September 23, 2008, the Court entered a Judgment, Permanent Injunction and Order Appointing Receiver. In this order, the Court named the Department as receiver, entered a money judgment in the amount of \$1,195,009 and awarded \$140,000 in penalties. Smiley refused to deliver the Iraqi Dinars as ordered by the Court and has since been incarcerated due to his contempt of the Court's orders.

January 23, 2008

GLENN B. HENZLER; BCM ENTERPRISES, LLC; Nampa, ID – In May 2007, the Department filed a civil securities lawsuit against Glenn B. Henzler and BCM Enterprises alleging violations of the registration and anti-fraud provisions of the Idaho Uniform Securities Act. The complaint alleged that the defendants offered and sold securities in the form of a high yield investment program with purported yields of approximately 7 percent per month or 84 percent per year.

On January 23, 2008, a judgment including a permanent injunction was entered after the defendants stipulated to a settlement in this matter. The judgment included a money judgment for restitution in the amount of \$133,000 and penalties in the amount of \$40,000. In the stipulation, Henzler neither admitted nor denied violations of the Idaho Uniform Securities Act and the Department agreed to waive the penalties in the event that Henzler paid the restitution amount no later than December 31, 2008.

August 16, 2007

ROBERT FISHER, Middleton, ID; THE BABCO GROUP, LLC – In June 2007, the Department filed a civil securities action against these defendants alleging that they sold investment contract securities in violation of the anti-fraud provisions of the Idaho Uniform Securities Act. The complaint alleged that the defendants represented to investors that their investment proceeds would be used to purchase residential real estate and that investors would be repaid when the property was sold.

On August 16, 2007, the court entered a Stipulated Judgment and Permanent Injunction and found that the defendants violated the Idaho Uniform Securities Act by misrepresenting and omitting material facts in connection with the offer or sale of securities. The court permanently enjoined Fischer and The Babco Group LLC from engaging in future violations of the Idaho Uniform Securities Act, and ordered the defendants to pay investors \$17,877 in restitution.

II. ADMINISTRATIVE SANCTIONS & ORDERS ISSUED UNDER THE UNIFORM SECURITIES ACT

July 16, 2007

EMI SUN VILLAGE, INC., Puerto Plaza Dominican Republic; SUN VILLAGE JUAN DOLIO, INC., Turks and Caicos Islands; SUN VILLAGE JUAN DOLIO ASSOCIATES, LLC, Henderson, NV – Consent Order To Cease And Desist – The Order alleges that these entities contracted with a Nevada-based network marketing company and thereafter offered and sold Dominican Republic resort investment interests in Idaho and that violations of the registration and anti-fraud provisions of the Idaho Uniform Securities Act resulted from these activities. In the Order, the Respondents neither admitted nor denied violating Idaho law, but otherwise agreed to a) offer detailed and appropriate disclosures in association with a \$3 million refund offer that was to be made to affected Idaho investors, b) pay a civil penalty of \$40,000, c) comply with Idaho securities laws, and d) file an application for registration of a real estate offering in association with the refund offerings.

Since the issuance of the Order, the Respondents did make a rescission offering but have failed to make all payments called for in association with the rescission offering.

July 19, 2007

IMPACT, INC., DBA IMPACTNETWORTH.COM, DBA IMPACT NET WORTH, DBA IMPACT AMERICA, DBA IMPACT-AMERICA.COM, DBA IMPACT LENDING, DBA IMPACT CORPORATE; JAMES B. CATLEDGE, Henderson, NV – Consent Order to Cease and Desist – The Order alleges that Impact and Catledge promoted and operated a network marketing business and that associates of the firm engaged in violations of the Idaho Residential Mortgage Practices Act, while also violating the registration and anti-fraud provisions of the Idaho Uniform Securities Act. The securities activities of Impact, Catledge and their associates related directly to the Dominican real estate resort investment interests noted in the preceding action described above.

In the Order, Impact and Catledge a) admitted that unregistered securities had been sold, b) neither admitted nor denied other allegations of violations in the Order, c) agreed to pay a civil penalty of \$150,000, d) agreed to offer refunds to affected Idaho investors if not otherwise paid by the Sun Village Companies, and e) agreed to change their business practices in Idaho to avoid future violations of Idaho mortgage and securities laws. Since the issuance of the Order, the Respondents have failed to make refund payments to affected Idaho investors as a result of the failed rescission offering undertaken by the Sun Village entities.

August 16, 2007

IDAHO REAL ESTATE SOLUTIONS LLC, Boise, ID – Agreement and Order – The Respondent admitted that it had misrepresented a securities exemption acknowledgement by the Department by stating to consumers that their real estate related

program had been “fully endorsed by the Idaho Department of Finance.” In executing the Order, the Respondent agreed to a) comply with the law, b) send a corrective notice to any consumer that had responded to their solicitation, c) amend their advertising and obtain any necessary licenses that might be required by the Department of Finance Consumer Finance Bureau.

October 17, 2007

FRONT ROW TICKETS aka FRONT ROW EVENTS operating as FRONTROWEVENTS.COM; ANTHONY PETROELLI; SAM TAMURA; ROBERT PILLING; Alberta, Canada – Order to Cease and Desist - The Idaho Department of Finance issued a Cease and Desist Order in 2006 ordering a halt to the offer and sale of high-yield notes in Idaho. The order alleged that the Respondents engaged in the offer or sale of unregistered securities by an unregistered broker-dealer, and violated the anti-fraud provisions of the Idaho Uniform Securities Act. The order also alleged that Respondents promised returns on the notes of up to 152 percent per year.

In May 2007, a Final Order upholding and amending the Cease and Desist Order was issued by the Director and the Respondents filed an administrative motion for reconsideration as it pertained to the penalties assessed in this matter. On October 17, 2007, an Order Granting Motion To Reconsider was issued and the total fine imposed in this matter was amended to \$75,000.

January 16, 2008

TRECIA D. ROBERTS, DBA ROGERS FINANCIAL SERVICES, Idaho Falls, ID – Agreement and Order – The Respondent repeatedly failed to provide information to the Department concerning deficiencies identified during an examination of her investment advisory business. In resolution of the examination deficiencies and the Respondent’s failure to provide information as requested, the Respondent admitted to the violations alleged in the Order and agreed to a) withdraw her registration as an investment advisor, b) comply with the law in her continuing securities activities, and c) pay a \$750 fine.

February 22, 2008

JAMES A. BATTEN, Boise, ID – Agreement and Order – In conjunction with deficiencies identified during a Department examination, Batten admitted to violations of the Idaho Uniform Securities Act and the Rules Pursuant to the Idaho Uniform Securities Act in association with correspondence authored and distributed by the Respondent. Mr. Batten further agreed to a) future compliance with Idaho securities laws and regulations, b) a seven day suspension of his securities registration, and c) pay a fine of \$3,000.

CONSUMER FINANCE BUREAU SANCTIONS REPORT

I. ORDERS ISSUED UNDER THE IDAHO COLLECTION AGENCY ACT

October 4, 2007 **APELLES, LLC** (Westerville, Ohio) – On October 4, 2007, the Idaho Department of Finance and Apelles, LLC (Apelles) entered into an agreement and order to address unlicensed collection activity in Idaho. Apelles attempted to collect debts from Idaho consumers on at least sixty-four (64) occasions without a license in violation of the Idaho Collection Agency Act.

Under the terms of the agreement and order, Apelles paid to the Department an administrative penalty of \$1,500 and \$500 in attorney fees and investigative costs. Apelles also agreed to comply with all provisions of the Idaho Collection Agency Act and promulgated rules thereunder at all times in the future.

Apelles obtained and currently holds an Idaho collection agency license.

December 10, 2007 **CACV OF COLORADO, LLC** (Denver, Colorado) – On December 10, 2007, the Idaho Department of Finance and CACV of Colorado, LLC (CACV) entered into a consent order which addressed unlicensed collection activity in Idaho in violation of the Idaho Collection Agency Act.

Under the terms of the consent order, CACV paid to the Department an administrative penalty of \$20,000 and \$1,000 in attorney fees and investigative costs. CACV also agreed to comply with all provisions of the Idaho Collection Agency Act and promulgated rules at all times in the future.

CACV obtained and continues to hold an Idaho collection agency license.

December 10, 2007 **CACH, LLC** (Denver, Colorado) – On December 10, 2007, the Idaho Department of Finance and CACH, LLC (CACH) entered into a consent order which addressed unlicensed collection activity in Idaho in violation of the Idaho Collection Agency Act.

Under the terms of the consent order, CACH paid to the Department an administrative penalty of \$20,000 and \$1,000 attorney fees and investigative costs. In addition, CACH agreed to comply with all

provisions of the Idaho Collection Agency Act and promulgated rules at all times in the future.

CACH obtained and continues to hold an Idaho collection agency license.

December 10, 2007 **HEALTHCARE FUNDING SOLUTIONS, LLC** (Denver, Colorado) – On December 10, 2007, the Idaho Department of Finance and Healthcare Funding Solutions, LLC (Healthcare Funding) entered into a consent order which addressed unlicensed collection activity in Idaho in violation of the Idaho Collection Agency Act.

Under the terms of the consent order, Healthcare Funding paid to the Department an administrative penalty of \$20,000 and \$1,000 in attorney fees and investigative costs. Healthcare Funding also agreed to comply with all provisions of the Idaho Collection Agency Act and rules promulgated thereunder at all times in the future.

Healthcare Funding obtained and continues to hold an Idaho collection agency license.

January 9, 2008 **CREDIT SOLUTIONS OF AMERICA, INC.** (Dallas, Texas) – In or about May of 2007, the Idaho Department of Finance received a consumer complaint alleging that Credit Solutions of America, Inc. (Credit Solutions) was conducting debt collection activity in Idaho without the license required by the Idaho Collection Agency Act. During its investigation of Credit Solutions, the Department discovered that since 2004, Credit Solutions had contracted with 484 Idaho debtors and had received at least \$588,000 in net payments from Idaho debtors. To address the violations of the Idaho Collection Agency Act, the Department and Credit Solutions entered into a consent order.

Under the terms of the consent order, Credit Solutions agreed to pay approximately \$588,000 in restitution to Idaho debtors; to provide its services to existing clients without compensation; to provide the Department with a full list of Idaho clients; and to advise its clients of the restitution by using a form letter approved by the Department. Credit Solutions also agreed to pay \$3,000 in attorney fees and investigative costs to the Department. In addition, Credit Solutions agreed to immediately cease from conduction collection activities in Idaho and to comply with all provisions of the Idaho Collection Agency Act. At the conclusion of the case, Credit Solutions paid a total of \$665,438 in restitution to Idaho debtors.

April 14, 2008 **DEBT EQUITIES, LLC** (Golden Valley, Minnesota) – Debt Equities, LLC (Debt Equities) and the Idaho Department of Finance entered into a consent order on April 14, 2008. In the consent order, Debt Equities admitted that it had engaged in unlicensed collection activity in Idaho in violation of the Idaho Collection Agency Act.

The company agreed to pay to the Department an administrative penalty of \$2,500.00 and \$500.00 in attorney fees and investigative costs, and agreed to comply with all provisions of the Idaho Collection Agency Act and rules promulgated thereunder at all times in the future.

Debt Equities has applied for but has not been issued, an Idaho collection agency license.

II. CIVIL ENFORCEMENT ACTIONS INITIATED OR COMPLETED UNDER THE IDAHO COLLECTION AGENCY ACT

June 27, 2008

NATIONAL CREDIT ACCEPTANCE, dba NATIONAL CREDIT ACCEPTANCE, INC. (Sacramento, California) – On June 27, 2008, the Idaho Department of Finance filed a civil enforcement lawsuit against National Credit Acceptance, dba National Credit Acceptance, Inc. (NCA) in the Fourth Judicial District Court, Ada County, Idaho, alleging unlicensed collection activity in Idaho in violation of the Idaho Collection Agency Act and in violation of a Cease and Desist Order previously issued by the Director.

The complaint seeks a court order permanently enjoining NCA from further violations of the Idaho Collection Agency Act, restitution to Idaho consumers injured by the unauthorized collection activity, a \$2,500 penalty for each violation, plus costs, attorney fees, and investigative costs.

III. ORDERS ISSUED UNDER THE IDAHO RESIDENTIAL MORTGAGE PRACTICES ACT-Mortgage Companies

July 3, 2007

BRIDGE CAPITAL CORPORATION (Mission Viejo, California) – On April 24, 2007, the Idaho Department of Finance filed a complaint to revoke the mortgage broker/lender license issued to Bridge Capital Corporation (Bridge Capital). The complaint alleged that Bridge Capital had originated loans in Idaho through unlicensed loan originators. Bridge Capital failed to file an answer to the Department's complaint. On July 3, 2007, the Director issued a default order revoking Bridge Capital's Idaho mortgage broker/lender license.

A company representative informed the Department that in June of 2007, it had ceased doing business.

July 20, 2007

SYNERGY FINANCIAL MANAGEMENT, dba DIRECTLENDER.COM (Fountain Valley, California) – On July 20, 2007, the Idaho Department of Finance and Synergy Financial Management, dba Directlender.com (Synergy Financial) entered into an agreement and order resolving violations of the Idaho Residential Mortgage Practices Act (the Act).

Under the terms of the agreement, Synergy Financial admitted it contracted or employed unlicensed mortgage loan originators in Idaho and accepted at least seven mortgage loan applications through those unlicensed mortgage loan originators. Synergy Financial also paid to the Department an administrative penalty of \$2,500 and \$800 for attorney fees and investigative costs. Further, Synergy Financial agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

Synergy Financial no longer retains a mortgage broker/lender license.

July 26, 2007

PREMIER MORTGAGE, LLC, dba BOISE PREMIER MORTGAGE, LLC (Bellevue, Washington) – On July 26, 2007, the Idaho Department of Finance and Premier Mortgage, LLC, dba Boise Premier Mortgage, LLC (Premier Mortgage) entered into an Agreement and Order which resolved violations of the Idaho Residential Mortgage Practices Act (the Act) without the filing of an administrative complaint seeking revocation or suspension of Premier Mortgage's mortgage broker/lender licenses.

Under the terms of the agreement, Premier Mortgage admitted it contracted or employed unlicensed loan originators in Idaho, agreed to pay to the Department an administrative penalty of \$1,000 and \$500 for attorney fees and investigative costs. Premier Mortgage also agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

Premier Mortgage no longer retains a mortgage broker/lender license.

August 7, 2007

COMMUNITY LENDING GROUP, INC. (Riverton, Utah) – On June 27, 2007, the Director issued an Order to Cease and Desist against Community Lending Group, Inc. (Community Lending), a Utah-based mortgage broker/lender licensed under the Idaho Residential Mortgage Practices Act. The Order to Cease and Desist required Community Lending to cease forwarding to Idaho residents advertisements concerning mortgage loans, which advertisements were misleading, confusing, false, and deceptive. To address the allegations included in the Order to Cease and Desist, on August 7, 2007, the Idaho Department of Finance and Community Lending entered into an agreement and order, which included Community Lending's agreement to pay to the Department an administrative penalty of \$5,000.

Community Lending agreed that for a period of one year, the Department would review all advertising and solicitations prior to the company's dissemination of such material to Idaho consumers. In addition, Community Lending agreed to comply with all provisions of the Idaho Residential Mortgage Practices Act and rule promulgated thereunder at all times in the future.

Community Lending retains a mortgage broker/lender license.

August 20, 2007

WR STARKEY MORTGAGE, LLP (Plano, TX) – On August 20, 2007, the Idaho Department of Finance and WR Starkey Mortgage, LLP (WR Starkey) entered into an agreement and order addressing unlicensed loan origination activity in Idaho. In its renewal application, WR Starkey indicated it had contracted with at least one individual that had conducted loan origination activity in Idaho without the license required by the Idaho Residential Mortgage Practices Act.

Under the terms of the agreement and order, WR Starkey agreed to pay to the Department an administrative penalty of \$1,000 and \$500 in attorney fees and investigative costs.

WR Starkey retains a mortgage broker/lender license.

September 4, 2007

MILLENNIUM CORPORATION, dba MOUNTAIN VIEW MORTGAGE (Shelley, Idaho) – On September 4, 2007, the Idaho Department of Finance and Millennium Corporation, dba Mountain View Mortgage (Millennium) entered into an agreement and order addressing at least ten (10) counts of unlicensed loan origination activity in Idaho.

Under the terms of the agreement, Millennium paid an administrative penalty of \$2,000 and \$500 in attorney fees and investigative costs.

Millennium retains a mortgage broker/lender license.

September 14, 2007

AMERICAN HOME MORTGAGE CORP. dba AMERICAN BROKERS CONDUIT AND MORTGAGE SELECT (Melville, New York) – On July 31, 2007, the Idaho Department of Finance became aware that American Home Mortgage Corp., dba American Brokers Conduit and Mortgage Select (American Home Mortgage), an Idaho-licensed mortgage broker/lender and regulated lender, had lost its funding source for loans it had closed or intended to close with Idaho consumers. On August 1, 2007, a Department examiner met with a district manager employed by American Home Mortgage and was informed that it had not ceased its loan origination activity in Idaho and was continuing to accept applications for residential mortgage loans. On September 14, 2007, the Department and American Home Mortgage entered into a consent order to cease and desist to address the company's violations and current financial situation.

American Home Mortgage agreed to immediately cease advertising for its wholesale and retail businesses in Idaho; to immediately cease accepting any applications for residential mortgage loans or home equity lines of credit secured by Idaho real property or from Idaho consumers; to refer any pending applications to other viable lenders and to update the Department of such referrals; to release any liens filed on any Idaho real property or on property owned by an Idaho consumer which resulted from a residential mortgage loan it originated, but did not fund; and to comply with all provisions of the Idaho Residential Mortgage Practices Act and rules promulgated thereunder at all times in the future.

American Home Mortgage no longer retains a mortgage broker/lender license.

September 14, 2007 **STRATEGIC LENDING, LLC** (Provo, Utah) – On April 16, 2007, the Director issued an order to cease and desist against Strategic Lending, LLC (Strategic Lending) addressing the company’s unlicensed mortgage brokering or mortgage lending activity in Idaho. On September 14, 2007, the Idaho Department of Finance and Strategic Lending entered into an agreement and order addressing the unlicensed activity in Idaho.

Under the terms of the agreement, Strategic Lending paid to the Department an administrative penalty of \$1,000 and \$500 in attorney fees and investigative costs.

Following the Department’s action, Strategic Lending obtained and maintains a mortgage broker/lender license.

September 18, 2007 **COMMUNITY WEST MORTGAGE, LLC** (Englewood, Colorado) – The Idaho Department of Finance and Community West Mortgage, LLC (Community West) entered into an agreement and order following the Department’s issuance of an administrative complaint on September 14, 2007. The complaint alleged that Community West had engaged in mortgage loan origination activity on at least one occasion without a license as required by the Idaho Residential Mortgage Practices Act. To resolve the issues detailed in the complaint, Community West agreed to enter into an agreement and order with the Department.

In that order, Community West paid to the Department an administrative penalty of \$1,000 and \$500 in attorney fees and investigative costs. The company also agreed to comply with all provisions of the Idaho Residential Mortgage Practices Act and rules promulgated thereunder at all times in the future.

Community West no longer retains a mortgage broker/lender license.

September 24, 2007 **MONTGOMERY MORTGAGE, INC.** (Oregon City, Oregon) – On September 24, 2007, the Idaho Department of Finance and Montgomery Mortgage, Inc. (Montgomery) entered into an agreement and order addressing unlicensed loan origination activity in Idaho.

Under the terms of the agreement, Montgomery paid to the Department an administrative penalty of \$1,000 and \$500 in attorney fees and investigative costs.

Montgomery no longer retains a mortgage broker/lender license.

October 9, 2007 **VERITAS IN COMMERCIIUM LLC** (Rupert, Idaho and Saratoga Springs, Utah) – On October 9, 2007, the Idaho Department of Finance and Veritas In Commercium LLC (Veritas) entered into an agreement and order addressing Veritas' violations of the Idaho Residential Mortgage Practices Act. Such violations included engaging in unlicensed loan origination activity on at least six (6) occasions, and failing to disclose information required in an application for licensure.

Under the terms of the agreement and order, Veritas paid to the Department an administrative penalty of \$5,000 and \$500 in attorney fees and investigative costs.

Veritas retains a mortgage broker/lender license.

October 16, 2007 **N A NATIONWIDE MORTGAGE** (Mission Viejo, California) – On May 25, 2005, N A Nationwide Mortgage (Nationwide) entered into an independent contractor agreement with two individuals who would generate and process loans on Nationwide's behalf in Idaho. These two individuals disseminated advertisements to Idaho consumers which were confusing, misleading, deceptive, and which violated the Idaho Residential Mortgage Practices Act, the Idaho Financial Fraud Prevention Act, the Truth in Lending Act, and Regulation Z.

Nationwide admitted that it failed to diligently supervise and control the two individuals it had contracted with to do business in Idaho. As a result, on October 16, 2007, the Idaho Department of Finance and Nationwide entered into an agreement and order under which Nationwide paid an administrative penalty of \$1,000 and \$500 in attorney fees and investigative costs to the Department.

Nationwide retains a mortgage broker/lender license.

October 22, 2007 **FIRST CAPITAL GROUP, LP dba FCG MORTGAGE** (Irvine, California) – On September 14, 2007, the Idaho Department of Finance issued an administrative complaint against First Capital Group, LP dba FCG Mortgage (First Capital) seeking revocation of First Capital's Idaho mortgage broker/lender and regulated lender licenses. The

complaint alleged that First Capital engaged in at least two (2) counts of unlicensed loan origination activity in Idaho.

First Capital failed to file an answer to the complaint and a default order revoking its mortgage broker/lender license and terminating its regulated lender license was issued by the Director on October 22, 2007.

November 5, 2007

SAGE CREDIT COMPANY, INC., dba SAGE CREDIT (Irvine, California) – On May 9, 2007, the Director issued an order requiring Sage Credit Company, Inc., dba Sage Credit (Sage Credit), an Idaho licensed mortgage broker/lender, to cease committing violations of the Idaho Residential Mortgage Practices Act and the federal Truth in Lending Act by disseminating information to Idaho consumers that was confusing, misleading, and deceptive. Following the issuance of the Order to Cease and Desist, the Idaho Department of Finance discovered through numerous consumer complaints that Sage Credit had continued to disseminate the information to Idaho consumers. As a result, on June 26, 2007, a complaint to revoke or suspend Sage Credit’s mortgage broker/lender licenses was issued. The complaint alleged further violations of the Idaho Residential Mortgage Practices Act and the federal Truth in Lending Act due to Sage Credit’s continued dissemination of confusing, misleading, and deceptive advertisements to Idaho consumers, and also due to its failure to employ or contract with licensed loan originators.

To resolve the issues described in the complaint, on November 5, 2007 Sage Credit entered into a consent agreement and order with the Department, under which Sage Credit agreed to cease disseminating advertisements or solicitations to Idaho consumers that is confusing, misleading, and deceptive, and to ensure that it implements business procedures designed to prevent such violations from reoccurring. Further, Sage Credit paid an administrative penalty of \$10,000 to the Department and \$5,000 in investigative/examination expenses and attorney fees. Sage Credit also agreed to submit advertisements/solicitations it intends to disseminate to Idaho consumers for one (1) year, and to comply with all requirements of the Idaho Residential Mortgage Practices Act and rules promulgated thereunder at all times in the future.

Sage Credit retains a mortgage broker/lender license.

May 1, 2008

ASSURITY FINANCIAL SERVICES, LLC (Englewood, Colorado) – On May 1, 2008, the Director issued an Order to Cease and Desist against Assurity Financial Services, LLC (Assurity), a Colorado-based mortgage broker/lender licensed under the Idaho Residential Mortgage Practices Act (the Act). The Order to Cease and Desist required Assurity to cease forwarding to Idaho residents advertisements concerning mortgage loans, which advertisements were misleading,

confusing, false, and deceptive. After receiving the Order to Cease and Desist, Assurity informed the Department that it intended to become compliant with Idaho rules and regulations and would work with the Department to achieve full compliance.

Assurity maintains a mortgage broker/lender license.

May 16, 2008

21ST CENTURY FINANCIAL CORPORATION, INC. (Oakland, California) – On March 4, 2008, the Director issued a Cease and Desist Order against 21st Century Financial Corporation, Inc. (21st Century), ordering that the company cease disseminating information to Idaho consumers that was confusing, misleading, deceptive, and in some cases, false. On May 16, 2008, the Idaho Department of Finance and 21st Century entered into a consent order to resolve the issues addressed by the Cease and Desist Order.

In the consent order, 21st Century agreed to provide the Department with information concerning its dissemination to Idaho residents of the information that led to the issuance of the Cease and Desist Order and copies of files concerning loans that resulted from such dissemination. The company also agreed to pay to the Department an administrative penalty of \$2,500 plus \$1,000 in investigative costs and attorney fees. 21st Century also agreed for a period of twelve (12) months to provide to the Department copies of all proposed advertisements or solicitations prior to dissemination to Idaho residents.

21st Century retains a mortgage broker/lender license.

June 5, 2008

RIVERSIDE MORTGAGE, LLC (Rupert, Idaho) – On June 5, 2008, Riverside Mortgage LLC (Riverside) and the Idaho Department of Finance entered into a consent order revoking Riverside's mortgage broker/lender license. In the consent order, Riverside admitted to violations of the Idaho Residential Mortgage Practices Act and federal regulations applicable to mortgage brokering/lending. Such violations included engaging in unlicensed mortgage brokering activity; failure to disclose yield spread premium; and obtaining documents signed by borrowers in which blanks were left to be filled in later.

Riverside agreed to wind down and close its business by a set date, and agreed not to reapply for an Idaho mortgage broker/lender license for at least one year.

IV. ORDERS ISSUED UNDER THE IDAHO RESIDENTIAL MORTGAGE PRACTICES ACT—Loan Originators

September 13, 2007 **JAMES JOSEPH KNIGHT** (San Diego, California) – On June 15, 2007 the Idaho Department of Finance issued a complaint for revocation of this mortgage loan originator’s Idaho license for failure to maintain the surety bond required by Idaho law. Mr. Knight failed to respond to the Department’s complaint.

On September 13, 2007, the Director issued a default order revoking Mr. Knight’s mortgage loan originator license.

September 14, 2007 **GARY JAMES SROKA and JOSEPH TERRAZAS** (San Clemente, California) – Beginning in July 2007, the Idaho Department of Finance began receiving consumer complaints regarding advertisements and other solicitations that Gary James Sroka and Joseph Terrazas had disseminated in Idaho. During its investigation of the consumer complaints, the Department learned that Mr. Sroka’s and Mr. Terrazas’s employer had not approved the disseminated materials.

To address the concerns identified during the Department’s investigation and in the consumer complaints, on September 14, 2007 the Director issued an Order to Cease and Desist against Mr. Sroka and Mr. Terrazas. The order required Mr. Sroka and Mr. Terrazas to immediately cease disseminating information to Idaho consumers that is confusing, misleading, deceptive, false, and that violates the federal Truth in Lending Act and the Idaho Financial Fraud Prevention Act.

Mr. Sroka has never obtained a mortgage loan originator issued by the Department. Mr. Terrazas no longer retains a mortgage loan originator license.

October 16, 2007 **RONALD OTIS POPE** (Hayden, Idaho) – On December 5, 2003, the Director issued an Order to Cease and Desist against Ronald Otis Pope and his company for offering credit counseling activities in Idaho without the license required by the Idaho Collection Agency Act. On May 31, 2005, the Idaho Attorney General’s Office and Mr. Pope entered into an Assurance of Voluntary Compliance under the Idaho Consumer Protection Act after the Idaho Attorney General’s Office conducted an investigation of Mr. Pope’s business activities.

On July 12, 2007, the Idaho Department of Finance received an application for a mortgage loan originator license from Mr. Pope. In his application, Mr. Pope failed to disclose the administrative action and lawsuit described above and also provided false or misleading answers in his application.

For these reasons, on October 16, 2007, the Director concluded that Mr. Pope was not fit to hold the license he sought and denied the license application.

March 24, 2008

OSA JEREMIAH McDONALD (Boise, Idaho) – On August 16, 2006, the Idaho Department of Finance entered into an Agreement and Undertaking with Osa Jeremiah McDonald allowing him to be issued a mortgage loan originator license based on his showing of responsibility despite his past criminal record. The Agreement and Undertaking also required Mr. McDonald to fulfill all the terms of his probation and to pay full restitution to his victims. Additionally, his employer was required to maintain heightened supervision over Mr. McDonald.

On March 24, 2008, the Director issued an order revoking Mr. McDonald's mortgage loan originator license, because Mr. McDonald had failed to comply with the terms of the Agreement and Undertaking, to include being arrested and charged with DUI, which violated his probation. Mr. McDonald was later sent to prison for the crime of felony burglary.

Given those circumstances, the Director determined that it was in the public interest to revoke Mr. McDonald's mortgage loan originator license.

April 9, 2008

WILLIE LEON REAMS (Nampa, Idaho) – On April 9, 2008, the Director issued a default order revoking the mortgage loan originator license that the Idaho Department of Finance had issued to Willie Leon Reams on October 31, 2007. In the order, the Director found that Mr. Reams had failed to disclose to the Department in his mortgage loan originator license application that he had previously been charged with two felonies, theft and burglary, and that he had been convicted of grand theft, which information would have justified the Director in denying Mr. Reams' license application. Further, such omissions resulted in a false or misleading license application, also justifying the Director in denying Mr. Reams' license application. The Director found that the public interest required revocation of Mr. Reams' mortgage loan originator license due to his failure to disclose such material information.

The default revocation order resulted from Mr. Reams' failure to file an answer to the Department's complaint seeking revocation of his license.

DEPARTMENT OF FINANCE STAFF – JUNE 30, 2008

ADMINISTRATION

Gavin M. Gee	Director of Finance
Shirley A. Whitney	Administrative Assistant 2
A. Rene Martin	Deputy Attorney General (on assignment from AG)
Joseph B. Jones	Deputy Attorney General (on assignment from AG)
Alan Conilogue	Deputy Attorney General (on assignment from AG)
Rita Jensen	Paralegal (on assignment from AG)

SUPPORTING SERVICES BUREAU

David L. Jensen	Supporting Services Bureau Chief
David S. Wentland	IT Systems Integration Analyst, Sr.
Erik P. Jorgensen	Web Developer
Dan J. Hoard	IT Database Analyst, Associate
Paula J. Kaptan	Personnel Technician
Jill R. Peterson-Pate	Financial Technician
Caroline C. Dickson	Office Specialist 2

FINANCIAL INSTITUTIONS BUREAU

Mary E. Hughes	Financial Institutions Bureau Chief
Nancy G. Page	Administrative Assistant 1
Bryce C. J. Baertsch	Financial Institutions Examiner, Commissioned Sr.
George L. Baker	Financial Institutions Examiner, Commissioned Sr.
Brad P. Bergquist	Financial Institutions Examiner, Commissioned Sr.
Bruce M. Eames	Financial Institutions Examiner, Commissioned Sr.
Connie D. Newgard	Financial Institutions Examiner, Commissioned
Rita R. Roach	Financial Institutions Examiner, Commissioned
Rick J. Sherrick	Financial Institutions Examiner, Commissioned
Sam F. Blake	Financial Institutions Examiner 3*
Mark W. Boschulte	Financial Institutions Examiner 3*
Seth J. Ruhter	Financial Institutions Examiner 3*
Megan L. Conrad	Financial Institutions Examiner 2*
Andrew C. Forth	Financial Institutions Examiner 2*
Geoff L. Coonce	Financial Institutions Examiner 1*
Honalee R. Smith	Financial Institutions Examiner 1*

*underfilling Financial Institutions Examiner, Commissioned

CONSUMER FINANCE BUREAU

Mike Larsen	Consumer Finance Bureau Chief
Audrey L. Bath	Administrative Assistant 1
Karen A. Carlyle	Administrative Assistant 1
Martha (Marti) L. Cooper	Administrative Assistant 1
Carol A. Berenger	Office Specialist 2
Linda J. Tennyson	Office Specialist 2
Anthony T. Polidori	Financial Examiner/Investigator 4
Karlyne C. (K.C.) Schaler	Financial Examiner/Investigator 4
Jo Ann Lanham	Consumer Affairs Specialist
Rich A. Dekker	Financial Examiner/Investigator 2
Billie K. Havery	Financial Examiner/Investigator 2
Dan D. Kline	Financial Examiner/Investigator 2
Jan L. Kochan	Financial Examiner/Investigator 2
Tom S. Little	Financial Examiner/Investigator 2
Erin J. Van Engelen	Financial Examiner/Investigator 2
Vacant	Financial Examiner/Investigator 2

DEPARTMENT OF FINANCE STAFF - Continued

SECURITIES BUREAU

Marilyn T. Chastain	Securities Bureau Chief
Katy M. Witt	Administrative Assistant 1
Ginnie L. Sorensen	Securities Technician
Mary J. Harper	Technical Records Specialist 1
James A. Burns	Financial Examiner/Investigator 4
Patricia R. Highley	Financial Examiner/Investigator 4
Nancy C. Ax	Financial Examiner/Investigator 3
Walter L. Bitner	Financial Examiner/Investigator 3
Coleen F. Hodson	Financial Examiner/Investigator 3
Timothy D. Martin	Financial Examiner/Investigator 3
Kurt V. Merritt	Financial Examiner/Investigator 2

YEARS OF STATE SERVICE AS OF JUNE 30, 2008
Recognizing Over 500 years of Combined Service to the State of Idaho

Shirley A. Whitney	38.7	Years of Service
Gavin M. Gee	33.4	Years of Service
Nancy G. Page	31.9	Years of Service
Bryce C. J. Baertsch	31.8	Years of Service
Brad P. Bergquist	27.7	Years of Service
Paula J. Kaptan	26	Years of Service
George L. Baker	25.6	Years of Service
Katy M. Witt	24.5	Years of Service
Ginnie L. Sorensen	24	Years of Service
Marilyn T. Chastain	21.2	Years of Service
Jim A. Burns	21	Years of Service
Tim D. Martin	19.3	Years of Service
Patty R. Highley	18.7	Years of Service
Mary E. Hughes	18.4	Years of Service
Marti L. Cooper	17.2	Years of Service
Jo Ann Lanham	16.6	Years of Service
Coleen F. Hodson	15.8	Years of Service
Bruce M. Eames	14.7	Years of Service
Mike Larsen	12.9	Years of Service
Mary J. Harper	11.5	Years of Service
Billie K. Havery	11.5	Years of Service
Jill R. Peterson-Pate	11.3	Years of Service
Karlyne (K.C.) Schaler	10.5	Years of Service
Nancy C. Ax	10.3	Years of Service
Tony T. Polidori	7.7	Years of Service
Mark W. Boschulte	7.2	Years of Service
Walt L. Bitner	7.1	Years of Service
Sam F. Blake	6	Years of Service
Karen A. Carlyle	5.9	Years of Service
Rick J. Sherrick	4.8	Years of Service
Connie D. Newgard	4.7	Years of Service
Rita R. Roach	4.5	Years of Service
Jan L. Kochan	4	Years of Service
Andy C. Forth	3.9	Years of Service
Seth J. Ruhter	3.8	Years of Service
Dave L. Jensen	3.7	Years of Service
Daniel D. Kline	3.4	Years of Service
Erin J. Van Engelen	3	Years of Service
Rich A. Dekker	3	Years of Service
Dave S. Wentland	2.8	Years of Service
Megan L. Conrad	2.1	Years of Service
Erik P. Jorgensen	2	Years of Service
Thomas S. Little	1.9	Years of Service
Daniel J. Hoard	1.7	Years of Service
Linda J. Tennyson	0.8	Years of Service
Carol A. Berenger	0.6	Years of Service
Audrey L. Bath	0.4	Years of Service
Caroline C. Dickson	0.2	Years of Service
Kurt V. Merritt	0.1	Years of Service
Honalee R. Smith	0.1	Years of Service
Geoff L. Coonce	0.1	Years of Service
	580.0	Years of Service

AMERICANS WITH DISABILITIES ACT COMPLIANCE

It is the policy of the Idaho Department of Finance to comply with Title II of the Americans With Disabilities Act which mandates that no qualified individual shall be excluded from participation, denied benefits, services, or access to programs or activities, or be subjected to discrimination by any public entity.

The Department of Finance does not discriminate on the basis of disability in access to, admission to, or operation of its programs, services, or activities or in its hiring or employment practices.

Individuals who need accessible communication or other accommodations in order to participate in programs and services of the Department of Finance are invited to make their needs and preferences known to the ADA Compliance Coordinator.

Questions, concerns, complaints, or requests for additional information should be forwarded to:

ADA COMPLIANCE COORDINATOR
DEPARTMENT OF FINANCE
800 Park Blvd., Suite 200
P O BOX 83720
BOISE ID 83720-0031

Phone: (208) 332-8001
Fax: (208) 332-8098
TDD to Voice Relay: 1-800-377-3529

This notice is also available audibly from the ADA Compliance Coordinator.

CIVIL RIGHTS GRIEVANCE PROCEDURES

The Idaho Department of Finance presents the following grievance procedure for the quick and fair investigation of discrimination complaints. Persons who feel they may have been discriminated against under conditions prohibited by law may file a complaint. The laws are those relating to nondiscrimination in the use of any of the Department's public facilities, programs or activities. These laws include protected classes of race, color, national origin, age, disability, sex and religion.

Complaints should be addressed to:

DIRECTOR OF FINANCE
DEPARTMENT OF FINANCE
P O BOX 83720
BOISE ID 83720-0031

1. A complaint may be filed in writing or by cassette tape and should be submitted with the signature of the complainant.
2. The complaint should contain the name, address and telephone number of the complainant, the date of the alleged discrimination, and a description of what happened.
3. The complaint shall be filed within 90 days from the date of the alleged discrimination.
4. The Department will contact the complainant in writing within 10 working days of receiving the complaint to acknowledge receipt and relate what action the Department has taken or will take in an attempt to resolve the complaint.
5. An investigation will be conducted within 30 working days of the date the Department receives the complaint. Investigations are authorized by the Director and may be conducted by a designee. The complainant or complainant's representative may submit evidence to support the complaint.
6. The Director or the Director's designee will send a written response to the complainant regarding the results of the investigation within 30 working days of the time the investigation began.
7. If dissatisfied with the results of the investigation, the complainant may request that the case be reconsidered. The request for reconsideration shall be made in writing or by tape to the Director of the Department of Finance within 10 days of the receipt of the Department's resolution letter.

8. The complainant may also file a complaint with the following state and federal agencies:

IDAHO HUMAN RIGHTS COMMISSION
1109 MAIN STREET
BOISE ID 83720-0040

THE OFFICE FOR EQUAL OPPORTUNITY
U S DEPARTMENT OF THE INTERIOR
WASHINGTON DC 20240

9. The Supporting Services Bureau within the Department of Finance will maintain the files and records relating to complaints for a period of three years.

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Consumer Finance Bureau Chief.....	Mike Larsen
Supporting Services Bureau Chief.....	David Jensen

About the Cover:

The cover picture shows the Idaho State Capitol in August of 2008, halfway through a \$120 million dollar restoration and expansion. The Capitol Restoration Project includes repair and/or replacement of basic building services and features, and refurbishing of all public areas in the Capitol to their 1920 grandeur. Two new garden level wings, each 25,000 square feet, were added on either side of the legislative chambers. The wings will provide much needed office and meeting space.

Photo Credit: The Idaho Capitol Commission - used with permission
Photo by Paul Hosefros

For more information visit <http://capitolcommission.idaho.gov/>