





Building Blocks



C.L. 'Butch' Otter Governor

> Gavin M. Gee Director



July 1, 2011

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

Dear Governor Otter:

I am pleased to submit herewith the 106th Annual Report of the Department of Finance for fiscal year 2011, July 1, 2010 through June 30, 2011.

The Department's mission is to aggressively promote access to vigorous, healthy and comprehensive financial services for Idahoans. 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. These goals guide the Department's actions and provide a framework to review items of note from the past year.

The Department is also mindful of your administration's emphasis on growing the Idaho economy and recruiting new businesses and investment to Idaho. These, and other goals of Project 60, have been incorporated into the Department's efforts as we work with small businesses, budding entrepreneurs, financial institutions, and other financial service providers. We anticipate making significant new strides in this area in 2012.

The economic malaise the U.S. has experienced continued this year despite the official end of the recession in June 2009. While there are sporadic signs the economy is picking up, the housing market has not noticeably improved on a large scale; unemployment has remained in the 9 percent range; and, the European debt crisis threatens to further slow the American economy.

Highlights of the Department's fiscal year suggest a more positive economic picture in Idaho than is seen in the national economy. Department-wide, business filings, licenses and registrations exceeded 148,000 submissions, an increase of 9.7 percent over FY 2010. Both the financial institutions and securities areas showed significant growth in the number of those under their jurisdiction, each up more than 10 percent. During the first six months of 2011, the securities bureau saw Idaho registrations of investment professionals increase 24 percent to a record 90,293. The increase in the financial institutions numbers was due largely to the May 2011 conversion of the largest Idaho-based bank, Home Federal Bank of Nampa, from a federal thrift charter to a state chartered commercial bank. The number of consumer finance bureau licensees also increased; however, that growth was virtually all in the number of collection industry participants which reflects the struggles many Idahoans continue to face.

I am happy to report that once again, Idaho had no state-chartered financial institution failures during the fiscal year. Many Idaho institutions weathered this downturn because of the strong capital levels they held entering the recession, and because of their traditionally conservative practices. At the same time, the Department continues to work closely with those financial institutions that are engaged in capital-raising and other efforts in this challenging environment. We are committed to maintaining a strong system of community financial services that stand ready to assist small businesses and individuals as the economy recovers.

Despite the economic conditions, the Department collected more than \$11.2 million in revenue in this fiscal year. As a result, the Department transferred more than \$5.2 million to the General Fund, an amount approaching the Department's entire fiscal year expenses of \$5.3 million.

This Annual Report contains many other highlights of Department initiatives for both industry and consumers. Our employees have done a superb job of carrying out your administration's goals of providing quality and efficient service to our many stakeholders. We have continued our efforts to promote economic development, reduce regulatory burden, improve financial literacy, and protect consumers in the state. 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 Idaho Department of Finance

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About The Cover:

Highlighted are two of Governor Otter's initiatives to secure Idaho's economic future. The Hire One Tax Credit is designed to jump-start Idaho's economy by rewarding employers with a sliding-scale income tax credit. Project 60 is a comprehensive initiative to grow Idaho's Gross Domestic Product. See labor.idaho.gov and project60.idaho.gov.

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-three regulatory statutes:

Idaho Bank Act	Idaho Credit Code
Idaho Bank Holding Company Act	Idaho Mortgage Company Act
Idaho Interstate Banking Act	Idaho Collection Agency Act
Idaho Interstate Branching Act	Idaho Uniform Securities Act
Idaho International Banking Act	Idaho Residential Mortgage Practices Act
Idaho Trust Institutions Act	Business Combination Act
Idaho Savings Bank Act	Control Share Acquisition Act
Business And Industrial Development	Idaho Commodity Code
Corporation Act (BIDCO)	Endowment Care Cemetery Act
Idaho Credit Union Act	Continuing Care Disclosure Act
Idaho Money Transmitters Act	Idaho Escrow Act
Idaho Financial Fraud Prevention Act	Idaho Loan Broker 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 145,000 entities in 15 different financial service industries with billions of dollars in combined assets. 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 Economic Update – The National Bureau of Economic Research (NBER) determined that the recession began in December 2007 and ended in June 2009 when the economy began to expand again. The NBER was careful to note, however, that this did not mean economic conditions were favorable or that the economy had returned to normal. Rather, it indicated that economic expansion activity at the beginning of the business cycle is generally below normal and may remain so for an extended period.

This summer marked the second anniversary of the recovery, but the milestone only served as a reminder of how much more needs to be accomplished. Issues that rose to the forefront in the last several years persist. While economists predicted that the U.S. economic recovery would gain traction in 2011, the recovery hit a soft patch at the beginning of 2011. The U.S. Department of Commerce reported that real GDP output increased only 0.4 percent in the first quarter and 1.3 percent in the second quarter, which was significantly below the 1.9 percent forecasted for the first half of the year. Consumer spending, the cornerstone for economic growth, declined due to sluggish job growth, falling home values, stock market declines, and higher fuel and food prices, according to IHS Global Insight. As such, businesses are not likely to see economic activity increase until employment improves.

At the same time, the housing market remained dismal. In 2010, a record 2.9 million foreclosures were filed, up 2 percent from 2009. On a positive note, however, foreclosures declined 29 percent year over year as of June 30, 2011. Still, the housing sector remains fragile

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with regard to existing and new home sales and housing starts. Despite mortgage rates staying below 5% for all but two weeks in 2011, this year could be the worst for home sales in 14 years.

In Washington, the political parties have been unable to agree on the correct way to address government spending and the country's mounting debt. As we enter a presidential election year, these and the other economic problems facing the U.S. may not be resolved until after the elections.

Idaho Economic Conditions – Idaho's economy has not recovered as quickly as originally anticipated. The unemployment rate topped out at 9.7 percent in December 2010 before beginning a downward trend in 2011. However, in line with the national slowdown in spring 2011, payrolls fell in the second quarter as retail and manufacturing job losses offset growth in the leisure and hospitality sector. Housing prices continued to decline due to distressed sales and suppressed demand for new construction. As noted in the October 2011 *Idaho Economic Forecast*, published by the State of Idaho Division of Financial Management, Idaho's economic forecast was revised downward. Slower than expected growth in the U.S. economy hurt all od Idaho's major employment categories, with the housing-related sectors hardest hit. The forecast for Idaho housing starts was also reduced because of lower forecasts for national housing starts, which dampened the outlook for local construction employment.

Idaho-based financial institutions continued to be adversely impacted by weak economic conditions in fiscal year 2011, but showed signs of improvement, regardless of decreased deposit market share. As of year-end 2010, institutions headquartered in Idaho continued to outperform institutions nationwide with higher capital levels. However, persistent asset quality problems at Idaho institutions affected earnings. Overall, Idaho-based institutions experienced ongoing operating losses last year, but to a lesser degree than the previous year due to lower provision expense needed to cover loan losses.

Credit unions as a whole, including Idaho-chartered credit unions, continued to grow and provide financial security to their membership despite challenging economic conditions. Although total assets declined at Idaho credit unions, positive growth trends in shares (deposits), and loans continued. Furthermore, delinquency ratios declined for the first time since 2006. Overall, net

worth increased from 8.32 percent at year-end 2009 to 9.11 percent at year-end 2010, due primarily to positive earnings. One new credit union branch was approved and opened during the year, which provided an additional resource for Idaho consumers.

Historic Legislation Becomes Law – To address factors believed to have contributed to the severity of the economic decline, the U.S. Congress passed historic financial regulatory reform legislation in July 2010. This legislation, the Dodd–Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank Act"), reaches virtually all aspects of financial regulation and is considered the most sweeping financial regulation since the Great Depression. Implementation of the new law by federal and state financial regulators began during the fiscal year, including initial rulemaking by the Consumer Financial Protection Bureau (CFPB). However, no director has been confirmed to head the CFPB which limits the CFPB's authority over nonbank financial institutions such as payday lenders and mortgage originators.

State Legislation and Rulemaking – House Bill No. 331, the legislation proposed by the Office of the Attorney General to amend Idaho Code §45-1506, Manner of Foreclosure, was signed into law in April 2011. New sections 45-1506A through 45-1506C provide for additional notice to homeowners in foreclosure sales, and promoted better communication between lenders and homeowners about qualifications for loan modifications. The section also adds additional powers under the Idaho Consumer Protection Act for the Attorney General to redress violations of the Act by those charging advance fees for loan modification services who are not licensed by our Department. The bill was co-sponsored by the Idaho Bankers Association and supported by the Idaho Credit Union League, the Idaho Financial Services Association and our Department.

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. The Department and its staff endeavor to improve the quality of its regulation and reduce regulatory burdens, while also expanding educational opportunities for both industry and consumers.

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. This discount has resulted in significant savings for state-chartered financial institutions.

In addition to reducing fees, the Department has implemented ways to reduce other regulatory burdens without reducing the effectiveness of its regulatory oversight. For example, the Department continues to use 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.

Industry and Regulatory Cooperation and Education – 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 also 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 loan 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. Programs presented this year include the following:

- The Department Director and Consumer Finance Bureau staff made presentations at the annual meeting of the Idaho Financial Services Association.
- The Department co-sponsored the ninth annual Conference of State Bank Supervisors (CSBS) Colorado Graduate School of Banking Bank Directors Training Seminar and separate "Bankers Briefing" in Coeur d'Alene. Several prominent speakers shared current information on the future of community banking, interest rate risk and liquidity management in a challenging environment, roles of bank boards and banking supervisors, and regulatory restructuring and the Consumer Financial Protection Bureau.
- The Department hosted a Bankers Roundtable, where the Department and FDIC Regional Director and senior staff discussed areas of concern with Idaho bankers.
- The Department co-hosted a meeting of bankers on the National Guard Youth ChalleNGe Program, a nationwide program designed to help high school drop-outs, ages 16 to 18. The purpose of the meeting was to educate Idaho bankers about the program and their community reinvestment opportunities.
- The Director and the Financial Institutions Bureau Chief presented at the semi-annual Western Region Bank Regulators Conferences.
- The Director spoke at the annual and winter meetings of the Idaho and Oregon Bankers Associations and the Idaho Community Bankers Association.
- The Department provided training and participated in educational sessions with numerous industry and regulatory groups. These groups included the Mortgage Industry Advisory Board, Idaho Mortgage Lenders Association, National Association of Consumer Credit Administrators, Greater Twin Falls Association of Realtors, Nampa Association of Realtors, Idaho Housing Alliance, National Association of Professional Mortgage Women, Willamette Securities Conference, Idaho Tax Commission, Better Business Bureau, Idaho Bankers Association, Certified Commercial Investment Members, Small

Business Development Center, Idaho Credit Union League, National Association of State Credit Union Supervisors, The Eide Bailly Training Seminar for Bankers, and the Mountain West Bank Economic Symposium.

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.

This year staff made presentations at numerous high schools around the state; the College of Western Idaho; Boise State University through the University 101 classes and the Student Success Program; the University of Idaho School of Law; Idaho State Treasurer's Smart Women, Smart Money Financial Conference; Idaho Digital Learning Lab; Centennial Job Corps in Nampa, Idaho; Lewiston Community Library; the Business Professionals of America; DECA (a student marketing and finance group); and the Idaho Summit on Elder Abuse and Exploitation and Senior Scam Jam sponsored by the Boise State Center on Aging, Idaho Commission on Aging and the Department of Finance.

Financial Literacy Month 2011 – Joining state securities regulators and a broad-based coalition of consumer groups and industry members, including the Idaho Financial Literacy Coalition (IFLC), the Department participated in the thirteenth annual Financial Literacy Month during the month of April. On March 31, 2010 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 weekly press releases on financial "hot topics," and presentations on financial subjects to numerous community and government groups and schools, as well as a children's Piggy Bank Beauty Contest. The Get Smart Idaho coalition in northern Idaho once again hosted the area's Financial Literacy Week during April. Together, financial literacy proponents reached hundreds of Idahoans with the important message of getting financially literate.

Idaho Financial Literacy Coalition – The Department remained actively involved in the Idaho Financial Literacy Coalition (IFLC), including participating in its Day at the Legislature,

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.

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 – In general, the banking industry made progress in recovering from the financial crisis. Although operating losses persisted at Idaho-based institutions during calendar year 2010, income improved due to lower loan losses. Positive indicators of asset quality improvement came in two forms. Net loan charge-offs decreased \$6.4 million or 4.4 percent, and delinquencies declined sharply by \$71.1 million or 22.5 percent. Total deposits in Idaho-based institutions increased over the prior period, but decreased \$78 million or 1.7 percent at Idaho-chartered banks. Total assets continued to decline at state-chartered banks, falling 1.8 percent to \$5.9 billion over the same period. As credit demand remained weak, banks invested increased liquidity in securities and interest bearing deposits.

The financial crisis adversely impacted all institutions nationwide. At the 2011 fiscal year-end, the FDIC reported 865 banks nationwide as designated problem institutions, down from a high of 888 banks, all of which were under formal enforcement actions. These enforcement actions are intended to assist institutions avert possible failure. The Department and federal regulators closely monitor Idaho institutions under such actions as they work through specific challenges. Difficult economic conditions negatively affected many businesses and individuals, which directly affected Idaho-chartered institutions. At fiscal year-end 2011, four state-chartered institutions were under formal enforcement actions. Idaho First Bank entered into a Consent Order with the Department and FDIC on February 10, 2010, and Idaho Banking Company entered into a Written Agreement with the Department and the Federal Reserve Board on March 10, 2010. Syringa Bank and Bank of Idaho entered into Consent Orders with the Department and the FDIC on August 19, 2010, and March 18, 2011, respectively.

Credit Unions in Idaho – Idaho state-chartered credit unions experienced a slight reduction in total assets in calendar year 2010, but continued to enjoy growth in shares (deposits) and net worth. Total assets of state-chartered credit unions declined by \$15.7 million, or 0.69 percent, to \$2.3 billion. Total shares increased by \$71.0 million, or 3.64 percent, to \$2.03 billion, and total aggregate net worth increased by \$16.5 million, or 8.71 percent, to \$205.9 million.

Consumer Finance – By the end of fiscal year 2011 the Department observed a decline in the rate of residential mortgage loans that were either seriously delinquent or in foreclosure. These rates fell from 6.75 percent, reported at the end of fiscal year 2010, to 5.58 percent as of June 30, 2011. This year, the Department had regulatory oversight responsibility for 479 licensed regulated lender and title lender office locations, 213 licensed payday lender office locations, 614 licensed mortgage broker/lender office locations, 1,663 individual mortgage loan originator licensees, and 40 licensed escrow agency locations. In addition, the Consumer Finance Bureau had regulatory oversight responsibility for 617 licensed collection agencies, 80 debt buyers, 9 credit repair organizations, and 47 credit/debt counselor agencies. The number of collection agency solicitors/collectors registered in Idaho was 40,948 at fiscal year-end.

Securities – The Securities Bureau processed more than 103,000 submissions in fiscal year 2011, up more than 10 percent from the prior year. The Bureau's oversight also extends to more than 92,000 individuals who currently hold Idaho registrations as broker-dealer agents, investment adviser representatives and issuer agents. This represents an 11.68 percent increase over the prior fiscal year. Through civil and administrative sanctions, the Bureau obtained orders for approximately \$36 million in rescission for Idaho investors. The potential financial impact of securities cases under investigation or in the process of resolution during the fiscal year approached \$90 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 statechartered 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 services 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 statechartered financial institutions filed with the Department.

The Bureau works closely with federal and other state regulators to provide our industries seamless supervision, minimal disruption and costs, and effective use of 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. 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 on-site every five years and took place in 2010. The Department's banking and credit union programs have been continuously accredited by CSBS and NASCUS since 1990.

Education and Examiner Training - Continuing education and training continue to be very important elements to maintaining accreditation, as well as maintaining the confidence of those we regulate. The Department aggressively supports educational opportunities for its examiners. During fiscal year 2011, examiners attended training sessions provided or sponsored by the Federal Deposit Insurance Corporation, the Federal Reserve System, the Pacific Coast Banking School, the National Credit Union Administration, and the National Association of State Credit Union Supervisors. The ten examiners assigned to the banking section attended 17 weeks of offsite training during the fiscal year, and the six credit union examiners attended 16 weeks of training.

Legislation and Regulation - Important legislation and regulations were enacted during this fiscal year. These laws addressed the serious financial challenges facing the economy and the country's financial systems.

In the wake of the new Dodd-Frank Act, the FDIC announced in August 2010 that two new divisions would be created: one to handle systemic resolutions and the other devoted to consumer protection. FDIC's Office of Complex Financial Institutions will conduct "continuous" reviews and oversight of bank holding companies with more than \$100 billion of assets. Moreover, this office will also examine any non-bank financial companies designated as systemically important by the systemic risk council. The office is responsible for carrying out the FDIC's new resolution powers to seize and dismantle any failing large firm. Although the reform law created the Consumer Protection. This new division will provide increased visibility to the FDIC's compliance examination and enforcement program. The agency acknowledged the creation of a consumer protection regulator, but noted that while the CFPB will write new rules, the FDIC still has the responsibility to enforce them for all institutions with less than \$10 billion in assets.

President Obama signed the Small Business Jobs Act of 2010 in September 2010, which created a \$30 billion small business lending fund to provide capital to community banks to boost lending. The bill also contains \$12 billion in small business tax cuts and extensions of Small Business Administration guarantees. Under the program, banks with less than \$10 billion of assets can apply for capital with an initial dividend payment of 5 percent. That required dividend would drop, however, as banks boost small-business lending.

In October 2010, the Idaho Bankers Association invited the Department to participate in a review of Idaho's Public Depository laws. The committee is led primarily by city and county treasurers with other public depositories, the State Treasurer, the Attorney General's Office, the Idaho Bankers Association and others as members. City and county treasurers are primarily concerned with the lack of mandatory pledging of assets, federal deposit insurance, or other guarantees on public deposits in current law. These groups will consider revisions to the law to allow them

more flexibility to deposit and invest funds outside of their depositing units and with non-bank financial institutions and other investment companies.

Also in October 2010, the Federal Reserve Board (FRB) announced an interim final rule on home appraisals required by the Dodd-Frank Act. Provisions of the rule are designed to protect the integrity of the appraisal process when a consumer's home is securing the loan. This rule would replace the Home Valuation Code of Conduct (HVCC) and ensure that real estate appraisers are "free to use their independent professional judgment in assigning home values without influence or pressure from those with interests in the transactions." The rule also seeks to ensure that appraisers will receive customary and reasonable payments for their services.

In May 2011, the Department signed an information sharing Memorandum of Understanding (MOU) between the Consumer Financial Protection Bureau, Conference of State Bank Supervisors, and other state regulators. This MOU is intended to promote the efficient use of state and federal resources, consistent examination procedures and enforcement of state and federal consumer laws.

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).

With the conversion of Home Federal Bank from a national charter to a state charter in May 2011, there were nine bank holding companies, sixteen commercial banks (four with trust powers), and one BIDCO under the Banking Section's direct supervision as of June 30, 2011. 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, 2011, these institutions held \$1.8 billion of Idaho deposits and operated 73 offices throughout the state: AmericanWest Bank (9 branches), Banner Bank (8 branches), Inland Northwest Bank (4 branches), Sterling Savings Bank (18 branches), and Washington Trust Bank (13 branches) are chartered by the State of Washington; Bank of the West (7 branches) is chartered by the State of Oregon; and Lewiston State Bank (1 branch) is chartered by the State of Utah. As a host state supervisor, the Banking Section also has indirect supervision over eleven out-of-state bank or financial holding companies with banking operations in Idaho.

In fiscal year 2011, the Banking Section completed 13 risk management examinations, 9 consumer compliance examinations, and 3 trust examinations. In conjunction with the risk management examinations, the Banking Section also performed information technology examinations and Bank Secrecy Act examinations. The Banking Section participated in 7 risk management visitations, 1 targeted asset review, 1 consumer compliance visitation, and 1 coordinated supervisory review of an out-of-state bank holding company.

IDAHO BANKING INDUSTRY REVIEW

Performance and Condition of Idaho Financial Institutions - As of June 30, 2011, there were 18 financial institutions (16 state-chartered banks, 1 national bank, and 1 federal thrift) based in Idaho with combined assets of \$7.8 billion, net loans and leases of \$4.5 billion, and deposits of \$6.3 billion¹. While Idaho-based financial institutions continued to outperform institutions nationwide with higher capital levels, they continued to incur operating losses due to persistent, albeit declining, asset quality issues. As of June 30, 2011, the core capital ratio for Idaho-based institutions was stronger at 11.03 percent versus 9.20 percent for institutions nationwide. Idaho institutions reported net charge-offs to loans of 1.77 percent, down from 2.66 percent a year earlier, but slightly higher than the 1.70 percent reported for institutions nationwide. The percentage of Idaho's noncurrent loans to total loans decreased from 5.98 percent to 4.69 percent, which exceeded the 4.37 percent for the nation. The Return on Average Assets (ROAA) for both Idaho institutions and all institutions nationwide improved as provision expense declined. Nationwide, banks realized a 48 percent increase in earnings from \$39.0 billion to \$57.7 billion that translated to an increased ROAA of 0.86 percent, up from 0.59 percent. Earnings performance for Idaho institutions lagged behind banks nationwide as these institutions continued to incur losses, but at lower levels than the previous year. Losses at Idaho institutions were \$2.9 million, down from \$12.5 million reported the previous year. Consequently, the ROAA for Idaho institutions remained negative but improved from negative 0.32 percent to negative 0.07 percent.

Idaho continued to experience slow economic growth, high unemployment, and deteriorating real estate markets through fiscal year 2011. Idaho's nonfarm employment did not perform as strongly this summer as anticipated. Job growth made a strong showing in the first quarter, but stalled in the second quarter of 2011. Idaho economists lowered the growth trajectory for nonfarm employment and nominal personal income due to a dampened job outlook. According to the October 2011 Idaho Economic Forecast, published by the Idaho State Division of Financial Management, "expected growth over the forecast period will be lower than in past recoveries." Some areas of the employment sectors, such as leisure and hospitality, education

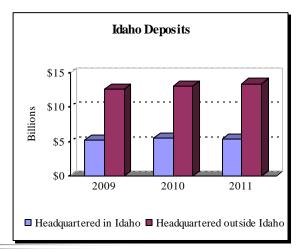
¹ Source: FDIC Statistics on Depository Institutions

and health services, and manufacturing, experienced growth year over year as of July 2011. However, jobs related to housing remained suppressed as permit issuance was near all-time lows. Jobs in the construction sector contracted another 6.1 percent and, coupled with losses in the information sector, nearly offset the gains in the leisure and education sectors. Manufacturing grew for the first time since the recession began; however, restoration of the 14,000 jobs lost during the downturn may likely take some time. Nonetheless, strong population growth is expected to drive Idaho's recovery as it remained above the national average.² Job creation is key for recovery of Idaho's housing market. In concert with national forecasts, the housing market is projected to begin improving by 2012. Depreciating real estate prices will most likely continue to affect financial institutions' performance. Recovery in this area will likely lag the rest of the nation due to excess supply and high foreclosure rates. Nonetheless, Idaho's favorable business costs remain an attractive draw for economic development.

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.

Idaho Deposits Decrease - There were 35 commercial banks and savings institutions operating 537 offices (four fewer offices than the previous year) competing for deposits in Idaho as of June 30, 2011. Institutions headquartered outside of Idaho increased their percentage of deposits held to 71.5 percent, while the 18 institutions based in Idaho lost market share and held 28.6 percent of Idaho deposits, down from 29.6 percent of deposits held last year.

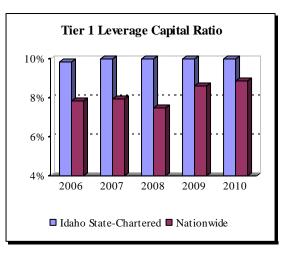
Total deposits in Idaho increased 1.1 percent during the year, to \$18.9 billion as of June 30, 2011. Deposits of institutions based in Idaho decreased 2.5 percent, while institutions based outside Idaho increased market share by 3.1 percent to \$13.5 billion.



² Moody's Analytics, August 2011

Capital Levels Decrease at State-Chartered Banks

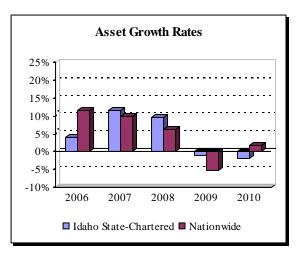
Idaho state-chartered banks reported a decrease in the average Tier 1 Leverage Capital ratio from 11.01 percent as of December 31, 2009, to 10.78 percent as of December 31, 2010. This ratio greatly exceeded the 8.89 percent average of all banks in the nation. Total equity capital of statechartered banks declined 2.61 percent in 2010 from \$704 million to \$686 million. However, statechartered banks reported increases in other key



capital measurements with the average Tier 1 Risk-Based Capital ratio increasing from 13.73 percent to 15.16 percent, and the average Total Risk-Based Capital ratio increasing from 14.98 percent to 16.42 percent, comparing favorably to the national average of all banks of 12.70 percent and 15.27 percent, respectively.

Asset Size Declines in State-Chartered Banks

Idaho state-chartered banks reported total assets of \$5.9 billion as of December 31, 2010, a slight 1.8 percent decrease from \$6.0 billion on December 31, 2009. Conversely, banks nationwide increased assets 1.8 percent. The disparity in 2006 reflected on the chart was due to the acquisition of an Idaho state-chartered institution by an out-of-state bank.



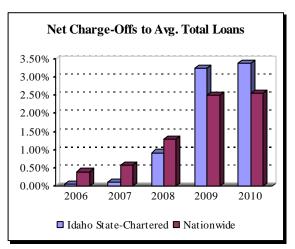
The largest decrease to asset size at Idaho-

chartered banks occurred in total loans and leases, while the size of loan and investment portfolios at banks nationwide increased. Notably, however, loan growth for banks nationwide occurred primarily in the consumer credit card sector of the loan portfolio. Loans and leases held by Idaho-chartered banks totaled \$3.8 billion as of year-end 2010, a reduction of \$513 million or 1.2 percent, compared to a \$93 billion or 1.3 percent increase reported for all banks

nationally. Construction and land development loans held by state-chartered institutions declined 35.3 percent from \$862 million to \$558 million, the largest portion of which consisted predictably of a 66.3 percent decline in residential construction.

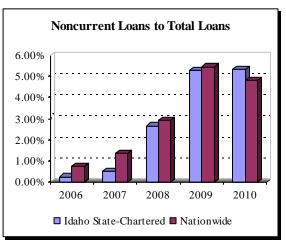
Idaho state-chartered banks reported \$4.6 billion in total deposits as of December 31, 2010, a decrease of \$78 million or 1.7 percent from the \$4.7 billion reported as of December 31, 2009. Deposits at banks nationwide increased from \$9.2 trillion to \$9.4 trillion or 2.1 percent.

Asset Quality and Earnings - Given the continuing challenges in the economy, Idaho state-chartered banks experienced additional deterioration in asset quality in 2010. Although the amount of net charge-offs decreased, the ratio of net charge-offs to total loans and leases for Idaho state-chartered banks increased from 3.24 percent in 2009 to 3.38 percent in 2010, which exceeded the national average of 2.55 percent.



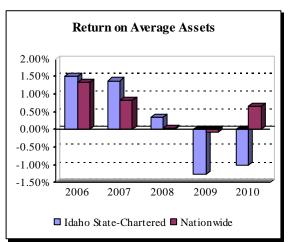
Noncurrent loans decreased 11.0 percent from \$228 million to \$203 million. However, due to

the reduction in size of the loan portfolios, noncurrent loans to total loans for state-chartered banks increased slightly in 2010 from 5.29 percent to 5.34 percent, which exceeded the national rate of 4.87 percent. Idaho state-chartered banks also reported lower reserves for possible loan losses than for all banks nationwide. The allowance for loan and lease losses for Idaho state-chartered banks stood at 2.92 percent of total loans as of



December 31, 2010, compared to 3.14 percent for all banks nationwide.

Idaho state-chartered banks reported losses of \$60.1 million in 2010 or an improvement of 21.1 percent, compared to losses of \$76.2 million in 2009. Net interest income decreased 7.2 percent during 2010 to \$226.9 million, due to lower yields on earning assets. The net interest margin for state-chartered institutions contracted 26 basis points from 4.47 percent to 4.21 percent at yearend 2010. Non-interest income increased 4.01



percent, while non-interest expense only increased 3.7 percent. Lower provision expense was the primary reason for lower losses at state-chartered institutions. Provisions for loan and lease losses decreased 32.1 percent from \$185.7 million at year-end 2009 to \$126.0 million at year-end 2010. All of these factors contributed to the overall improvement in the year-end return on average assets (ROAA) for Idaho-chartered institutions. ROAA for Idaho state-chartered banks increased 26 basis points from -1.27 percent in December 2009 to -1.01 percent in December 2010, while the ROAA for banks nationwide increased from -0.07 percent to 0.65 percent over the same period. The negative ROAA for Idaho-chartered banks is indicative of lingering asset quality issues.

Commercial Banks Based in Idaho Aggregate Condition and Performance

IDAHO BANKS	6/30/2011	6/30/2010	\$/# Change	% Change	12/31/2010	12/31/2009	\$/# Change	% Change
(dollar figures in millions)								
Number of institutions reporting	17	16	1	6%	16	16	0	0%
Total employees (full-time equivalent)	2,307	2,008	299	15%	1,975	2,058	-83	-4%
AGGREGATE CONDITION AND	INCOME I	DATA			1			
Net income (year-to-date)	-4	-10	6	-62%	-59	-81	22	-27%
Total assets	7,394	6,349	1,045	16%	6,253	6,380	-127	-2%
Earning assets	6,646	5,752	895	16%	5,687	5,776	-89	-2%
Total loans & leases	4,322	4,408	-86	-2%	4,031	4,601	-570	-12%
Other real estate owned	127	57	70	122%	83	56	27	49%
Total deposits [*]	5,897	5,035	862	17%	4,920	5,019	-99	-2%
Equity capital	891	777	114	15%	734	750	-16	-2%
PERFORMANCE RATIOS (YTD,	%)		BP Change				BP Change	
Yield on earning assets	4.69	5.27	-58		5.22	5.76	-54	
Cost of funding earning assets	0.76	1.12	-36		1.04	1.35	-31	
Net interest margin	3.93	4.14	-21		4.18	4.41	-23	
Noninterest income to earning assets	1.07	0.98	9		1.12	1.06	6	
Noninterest expense to earning assets	4.01	4.02	-1		4.25	4.01	24	
Net charge-offs to loans & leases	1.88	2.68	-80		3.33	3.13	20	
Credit-loss prov. to net charge-offs	91.67	78.18	1,350		88.87	134.22	-4,535	
Net operating income to assets	-0.09	-0.33	24		-0.96	-1.31	35	
Retained earnings to average equity	-1.39	-2.96	157		-8.75	-12.65	390	
Pre tax return on assets	-0.14	-0.46	32		-1.05	-1.73	68	
Return on assets	-0.10	-0.31	21		-0.93	-1.26	33	
Return on equity	-0.85	-2.54	169		-7.77	-10.47	270	
CONDITION RATIOS (%)								
Net loans and leases to assets	56.66	67.48	-1,082		62.53	69.97	-1,128	
Loss allowance to:								
Loans and leases	3.07	2.81	26		2.99	2.99	0	
Noncurrent loans and leases	61.96	46.56	1,540		53.38	52.61	77	
Noncurrent loans to total loans	4.95	6.03	-108		5.61	5.68	-7	
Nonperforming assets to total assets	4.61	5.09	-48		4.94	4.97	-3	
Core deposits to total liabilities ^{*3}	81.95	80.28	167		80.05	71.82	823	
Equity capital to total assets	12.05	12.25	-20		11.72	11.76	-4	
Core capital (leverage) ratio	11.04	11.27	-23		10.85	11.00	-15	
Total capital to risk-weighted assets	18.27	15.96	231		16.52	14.97	155	
1-4 family mortgages to total assets	12.83	13.48	-65		13.34	13.33	1	
Total real estate loans to total assets	41.81	48.85	-704		45.51	50.35	-484	

³Source: FDIC's Statistics on Depository Institutions. *The core deposit definition was changed in March 2011. Core deposits held in domestic offices now include total domestic office deposits minus 1) time deposits of more than \$250,000 held in domestic offices and 2) brokered deposits of \$250,000 or less held in domestic offices. Prior to March 2010, core deposits were calculated by subtracting time deposits of \$100,000 or more held in domestic offices from total domestic office deposits.

Branch and Relocation Application Activity – The Department granted approval for one new bank branch in fiscal year 2011. Community 1st Bank opened a new branch located at 435 West Hanley, Coeur d'Alene, Idaho, in July 2011. Effective January 18, 2011, The Bank of Commerce completed its relocation to the newly constructed branch located at 624 Jensen Grove in Blackfoot, Idaho.

Bank Conversions – Home Federal Bank converted to a state charter in May 2011. Home Federal Bancorp, Inc., is headquartered in Nampa, Idaho, and is the parent company of Home Federal Bank, a community bank originally organized in 1920. The bank serves southwestern Idaho and Central and Western Oregon through 34 full-service branches.

In June 2011, the bank notified the Department of its intent to close the Portland branch effective September 30, 2011. The bank also plans to close five additional branches, two in Idaho and three in Central Oregon later this year and at the beginning of 2012. The closures are the result of the holding company's objectives to improve operating efficiencies, reduce expenses, and restore profitability after fully integrating the acquisition of two banks in 2009 and 2010.

TRUST DEPARTMENTS AND TRUST COMPANIES

The Banking Section is responsible for enforcing the *Idaho Trust Institutions Act* and currently supervises the trust departments of four 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 15.20 percent during the year to \$466.8 million as of December 31, 2010, consisting of \$287.9 million in managed assets, and \$178.9 million in non-managed assets.

The Department has approved three out-of-state trust companies to operate in Idaho. Two of these companies—First Capital Surety and Trust Company (Sioux Falls, South Dakota), and U.S. Trust Company of Delaware (Wilmington, Delaware) —have no offices in Idaho. State Bank & Trust (Fargo, North Dakota), operates a representative trust office in Boise. 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.

	12/31/2010 (\$ amounts in thousands)	12/31/2009 (\$ amounts in thousands)	\$/# Change	% Change
Fiduciary powers granted	7	8	-1	-12.50%
Fiduciary powers exercised	4	4	0	0.00%
Fiduciary or related activity	4	4	0	0.00%
Number of fiduciary and related				
asset accounts	2,008	2,106	-98	-4.65%
Number of managed accounts	1,023	1,007	16	1.59%
Number of non-managed accounts	985	1,099	-114	-10.37%
Total fiduciary and related assets (\$)	466,762	405,189	61,573	15.20%
Managed assets (\$)	287,823	272,251	15,572	5.72%
Non-managed assets (\$)	178,939	132,938	46,001	34.60%

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 1,398 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 2009	Number	Dollar Amount			
Number and dollar amount of financing assistance provided to business firms: Number and dollar amount of financing assistance provided to minority-owned	5	\$23,000			
and woman-owned business firms:	2	\$7,200			
Estimated number of jobs created or retained through financing assistance:	25	NA			
Activity Since Inception	Number	Dollar Amount			
Number and dollar amount of financing assistance provided to business firms: Number and dollar amount of financing assistance provided to minority-owned	249	\$26,172,919			
and woman-owned business firms:	26	\$2,057,916			
Estimated number of jobs created:	1,024	NA			
Estimated number of jobs retained:	374	NA			

CREDIT UNION SECTION

The Credit Union Section is charged with the responsibility of supervising all Idaho statechartered credit unions and ensuring compliance with the Idaho Credit Union Act and numerous federal regulations. As of June 30, 2011, there were 39 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 Global Credit Union has branches in Coeur d'Alene, Moscow, and Post Falls; Horizon Credit Union has branches in Coeur d'Alene, Ponderay, Post Falls, and Sandpoint; Numerica Credit Union has branches in Coeur d'Alene and Hayden; and Spokane Teachers Credit Union has branches in Dalton Gardens, Ponderay, and Post Falls. Californiachartered 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); the Financial Institutions Bureau Chief currently serves on the NASCUS Board of Directors. 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. In November 2010, the Credit Union Section was successfully reaccredited by NASCUS for another 5-year term.

Branching Activity

During fiscal year 2011, Lewis Clark Credit Union opened a new branch, which is located in Clarkston, Washington. Two credit unions relocated branches: Icon Credit Union relocated its branch located on Government Way to Kathleen Avenue in Coeur d'Alene, and Idaho Central Credit Union relocated its Utah Avenue branch to Houston Circle in Idaho Falls.

Mergers and Conversions

During the fiscal year 2011, no mergers or conversions were undertaken by any of Idaho's statechartered credit unions.

Performance and Condition of Idaho Credit Unions

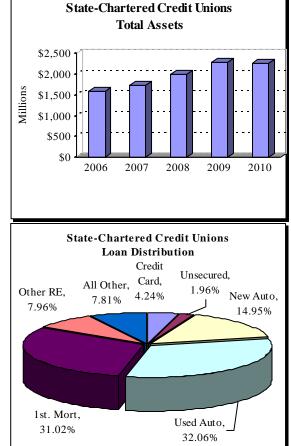
The total amount of assets declined slightly in Idaho state-chartered credit unions in 2010, which was a divergence from the growth trend in assets nationally. Loan growth also reflected a divergence from national trends. Idaho state-chartered credit unions achieved loan growth, while the total of all credit unions nationally recognized declines in total loan assets as of December 31, 2010. Idaho credit unions strived to manage operations and performance in a challenging financial environment. As a group, Idaho credit unions continue to provide financial security to their membership, offering needed products and providing basic financial services. 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, 2010.

Assets

Idaho state-chartered credit unions ended a multiyear asset growth trend in 2010. Total Assets declined by \$15.7 million, a year-to-year growth rate of negative 0.69 percent. Total assets as of December 31, 2010 for Idaho state-chartered credit unions were \$2.36 billion.

Loans

Total loans continued to increase in 2010, but at a slower pace than prior years. Loan growth for the year was 3.85 percent. Total loans for state-chartered credit unions are now almost \$1.69 billion, an increase of nearly \$62.6 million. First mortgage real estate loans increased by 4.36 percent in 2010, but no longer represent the largest section of the portfolio for state-chartered credit unions. Due to the \$54.1 million, or 11.11

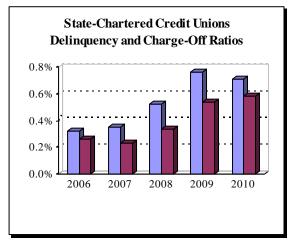


percent, growth in Used Auto Loans, they now comprise the largest portion, 32.06 percent, of the state-chartered loan portfolio. First mortgage real estate loans continued to comprise the largest

section of the national loan portfolio at 39.62 percent. For state-chartered credit unions, first mortgage real estate loans are now the second largest loan segment at 31.02 percent, followed by new autos at 14.95 percent of total loans. The fastest growing loan category in 2010 was unsecured credit card loans, which increased at a strong 29.91 percent and are now 4.24 percent of the loan portfolio. The state-chartered credit unions' aggregate loan portfolio had declines in the following three sectors: new vehicle Loans at a negative 9.74 percent growth rate, other real estate loans/lines of credit at a negative 1.43 percent growth rate, and total all other loans/lines of credit declined at a negative 0.79 percent rate.

Delinquency

Loan delinquency declined for the first time since 2006, falling to 0.71 percent in 2010, from the high of 0.76 percent in 2009. This decrease in delinquency may potentially provide the first sign of asset quality stabilization. Yet, it should be noted that Net Charge-offs to Average Loans increased to 0.58 percent from 0.54 percent in 2009. Nationally, the loan delinquency trend also was negative, falling to 1.77 percent as of

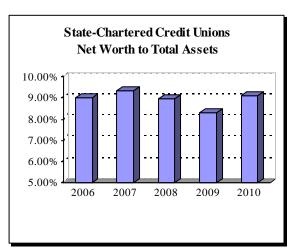


December 31, 2010, from 1.85 percent at year-end 2009. The charge-off ratio for the national aggregate of all credit unions decreased from 1.22 percent to 1.13 percent over the same period. The dollar amount of delinquent loans for Idaho state-chartered credit unions declined from \$12.3 million in 2009, to \$12.0 million. Net charge-offs for these same institutions increased by \$0.8 million and totaled \$21.6 million at the end of 2010.

Net Worth

The Net Worth to Total Assets ratio increased from 8.32 percent to 9.11 percent in 2010. Net worth levels in dollars increased by \$16.5 million to \$205.9 million, a growth rate of 8.71 percent. The increase in the Net Worth to Total Assets ratio stemmed primarily from positive earnings.

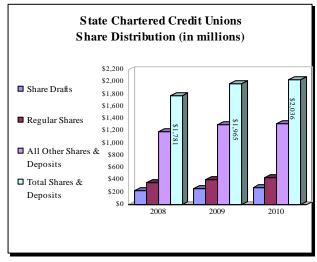
Operating Results



Net income for 2010 was \$16.5 million, an increase of \$4.1 million from the 2009 earnings of \$12.4 million. Total interest income for 2010 of \$101.7 million continued to constitute the largest portion of Idaho state-chartered credit unions' income. Total interest income has declined by almost \$2.2 million, or 2.16 percent, since 2009. Interest income on loans accounted for \$95.3 million of the \$101.7 million total. The largest interest expense remained interest paid on deposits at \$17.9 million or 73.01 percent of total interest expense. Total interest expense decreased by \$11.9 million, or 32.57 percent, from 2009. The largest portion of non-interest income has shifted to other operating income at \$17.1 million, an increase of \$2.7 million since 2009. Fee income, which traditionally has been the largest component of non-interest income, provided \$16.7 million to income, a decrease from the \$18.1 million earned in 2009. Total employee compensation and benefits of \$43.3 million represent the largest non-interest expense and have increased by \$1.0 million since 2009. The total of non-interest expense stayed essentially flat at \$80.5 million. Funding of the allowance for loan and lease loss account required an increase of provision expense in 2010 of \$1.6 million for a total provision expense of \$13.1 million. The Return on Average Assets ratio (ROAA) for 2010 increased by 15 basis points to 0.73 percent, stemming primarily from significantly lower dividend and borrowing costs.

Shares

Total shares increased by 3.64 percent to \$2.03 billion in 2010. Regular shares account for 21.95 percent of total shares, an increase from 20.45 percent in 2009. Growth has shifted from certificates to money market shares, which grew by 14.37 percent, and regular shares, which grew by 11.23 percent. Certificates decreased by 6.45 percent, but continue to be the largest portion of total



shares and deposits at 35.09 percent, or \$715 million.

Liquidity

Cash and cash equivalents decreased by 3.45 percent, or \$6.3 million, and were \$178.2 million as of December 31, 2010. Total investments also decreased to \$279.3 million, down \$75.5 million from \$354.8 million recorded in 2009. The Cash and Short Term Investments to Assets ratio as of 2010 was 12.28 percent, down 445 basis points from the prior year's 16.73 percent. Loans comprise 82.89 percent of shares and 74.67 percent of assets. Borrowing lines of \$147.3 remained available to, but unused by, Idaho state-chartered credit unions.

Summary

Overall, Idaho state-chartered credit unions remain financially viable and operate within their charters. Credit union managers continue to monitor their credit portfolios and economic trends to make certain 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 Idaho Loan Broker Statute

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 service 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 with Idaho residents are required to obtain a license under and comply with the provisions of the Act. Entities that engage in credit counseling, debt counseling, or 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.

The Bureau administers and enforces Idaho's Loan Broker statute that prohibits loan brokers operating in Idaho from receiving any fee, interest, or other charge prior to a loan or extension of credit, or written commitment to loan or extend credit, being made by an authorized lender.

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 financial services and ethical debt collection practices. The Bureau currently has a 16 member staff, which will increase to 23 in FY2012

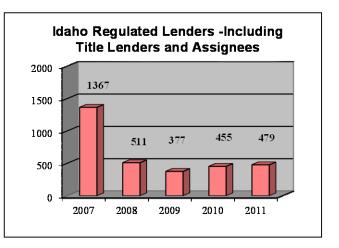
IDAHO CREDIT CODE

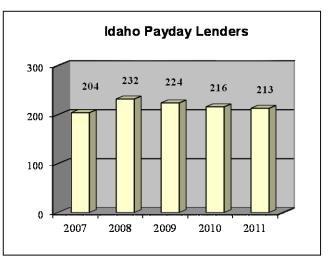
The *Idaho Credit Code* (ICC) is a state law that regulates specific terms and conditions of consumer credit in Idaho. A consumer credit transaction is a credit sale or loan in which the credit or loan is extended by a person who is regularly engaged in the offering of credit or financing to borrowers who will use it for personal, family or household purposes, and in which a finance charge is imposed 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 credit transactions such as automobile loans and extensions of credit through credit cards are subject to the ICC. The ICC also applies to 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 protection consumer provisions, such as a consumer's right to be informed about the costs of a loan before it is made, 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 2011, lending activity by state licensed regulated lenders ranged from a soleproprietor title lender to a national finance company with nearly a billion dollars in outstanding Idaho loans. The composition of regulated lenders consists of finance companies, including second mortgage lenders, consumer loan assignees, and payday/title lenders. As of June 30, 2011, Idaho had 479 licensed regulated lender offices, which includes title lenders, consumer loan assignees, consumer finance companies, and 213 licensed payday lender offices.

Compliance/Enforcement – In addition to answering consumer inquiries and complaints, staff members of the Department's Consumer Finance Bureau conduct routine and "for-cause" on-site examinations of regulated lenders. The Bureau is committed to regularly examining offices of payday and title lenders situated in Idaho to ensure that their business practices comply with Idaho Credit Code requirements. During the past fiscal year, the Bureau's field examiner staff members conducted 51 examinations of payday lender offices, 23 examinations of title loan offices, and 24 examinations of other regulated lender offices. Many licensees examined by the Bureau hold both a regulated lender license and a payday lender license. Therefore, Bureau examiners often have the ability to examine an entity's payday lending activity and other regulated lenders or title loans, during a single examination. The Bureau also received and acted upon 49 complaints from Idaho consumers regarding entities operating as regulated lenders or title lenders, and 10 complaints against payday lenders. The Department issued one cease and desist order against a company engaging in unlicensed payday lending activities and entered into administrative consent orders with two companies to resolve allegations of violations of the Act. Details of these actions are included in Exhibit VI.

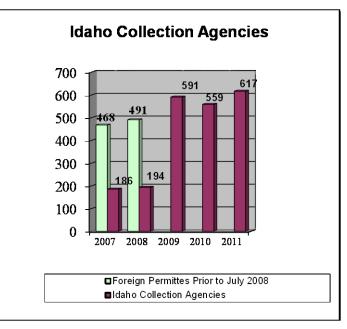
IDAHO COLLECTION AGENCY ACT

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 license:

- 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 either was delinquent or in default at the time it was acquired.



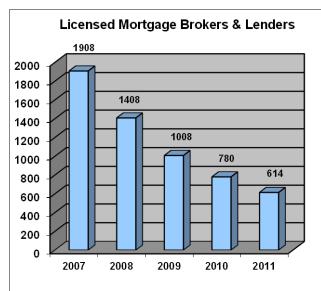
No matter where located, all entities engaged in any of the activities listed above in Idaho are required to obtain a Collection Agency license, which license must be renewed annually on or before March 15 of each year.

As of June 30, 2011, Idaho had 617 Idaho collection agency licensees. These agencies had a combined total of 40,948 individual solicitors/collectors registered with the Department. Additionally, the Department had licensed 47 credit/debt counselors, 9 credit repair organizations, and 80 debt buyers.

Compliance/Enforcement – In addition to answering consumer inquiries and complaints, the Bureau staff regularly conducts on-site compliance examinations of licensed collection agencies. During the past fiscal year, the Bureau's field examiner staff members conducted four examinations of collection agency licensees, two examinations of credit/debt counselor licensees, and one examination of a credit repair organization. The Department received 155 complaints against collection agencies and debt buyers, three complaints against credit/debt counselors, and three complaints against credit repair organizations. The Department entered into administrative consent orders with 20 companies to resolve allegations of violations of the Act. Furthermore, the Department initiated administrative actions to deny the license application of a collection agency applicant. Details of these actions are included in Exhibit VI.

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 mortgage broker and lender licensees. The purpose of the Act is to ensure that companies and individuals offering mortgage services meet minimum standards and that consumers are protected from unfair practices.



Mortgage brokers are companies in the business of:

- (i) assisting borrowers in obtaining mortgage loans from banks or other lenders; or
- (ii) assisting others to obtain an adjustment or compromise of an existing residential mortgage loan.

Mortgage lenders fund mortgage loans and may also perform the mortgage brokering activities mentioned above. Loan originators assist in the preparation of applications for new residential mortgage loans and for modifications of existing residential mortgage loans. The Act applies to those making first mortgage loans as well as to those making subordinated lien loans secured by a dwelling, as defined in section 103(v) of the Truth in Lending Act (15 U.S.C. Section 1601 *et seq.*), located in Idaho, or on residential real estate.

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 location from which they conduct mortgage brokering/lending activities. Licensees are not required to have a physical office location in Idaho. In fact, the Department has license holders nationwide. During the fiscal year, the Department issued 199 mortgage broker/lender licenses and as of June 30, 2011, the Department had 614 active mortgage broker/lender licenses in effect. The Department also had 1,663 mortgage loan originator licenses in effect as of that date.

Compliance – The Bureau conducts on-site examinations, and investigations when warranted, of mortgage brokers, lenders, and mortgage loan originators to verify that business is conducted in compliance with the Act. During fiscal year 2011 the Department conducted examinations of 37 mortgage broker/lender licensees. The Bureau also handles customer complaints and inquiries. In fiscal year 2011 the Department received and processed 62 complaints against mortgage brokers/lenders and mortgage loan originators.

Mortgage Loan Delinquencies – In fiscal year 2011, the Department observed a decrease over the previous year in the rates of residential loans in Idaho reported as seriously delinquent or in foreclosure. At the end of the second quarter of the fiscal year, December 31, 2010, the number of residential mortgage loans in Idaho that were in foreclosure or reported over 90 days delinquent had fallen to 6.21 percent. This trend in delinquencies and foreclosures continued and by the end of fiscal year 2011, these rates had dropped to 5.58 percent, representing a decrease of approximately 1.17 percent over the previous year. At the same time, the percentage of residential mortgage loans nationally that were seriously delinquent or in foreclosure was 7.85 percent.

Enforcement – In fiscal year 2011 the Department initiated 12 administrative actions against licensed mortgage loan originators resulting in administrative consent orders. 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 included 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. Idaho escrow agencies, as defined in the Idaho Escrow Act, are 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, 2011, the Department had issued 40 licenses to entities engaged in escrow activities in the state of Idaho. Additionally, during fiscal year 2011 the Bureau received eight complaints against an escrow company.

IDAHO LOAN BROKER STATUTE

Idaho's Loan Broker statute, Idaho Code § 26-2501 *et seq.*, prohibits anyone who acts as a loan broker in Idaho from receiving any fee, interest, or other charge prior to a loan or extension of credit being made to a borrower by an authorized lender, or prior to a written commitment of the same being made to a borrower by an authorized lender. During fiscal 2011 the Department received numerous inquiries from consumers contemplating paying upfront fees to loan brokers. In response to these inquiries, and in financial literacy trainings throughout the state, Department employees regularly warn Idaho citizens of the perils of falling prey to advance fee loan scams. Perpetrators of advance fee loan scams commonly operate from outside of the United States but use local sounding addresses. Victims are commonly asked to wire money to foreign locations as a part of the scam.

REGULATORY AND EDUCATIONAL INITIATIVES

Mortgage Advisory Board – Pursuant to the provisions of the Idaho Residential Mortgage Practices Act, the Director appoints four members to a Mortgage Advisory Board annually. The Mortgage Advisory Board meets quarterly with members of the Department and provides input on mortgage regulatory issues, market conditions, and industry initiatives. Through fiscal year 2011, the members of the Mortgage Advisory Board, who also represent mortgage industry associations in Idaho, provided the Department with vital support in disseminating legislative and regulatory changes to the mortgage industry in Idaho. As of the date of publication of this Annual Report, the two members of the Mortgage Advisory Board representing the Idaho Mortgage Lenders Association (IMLA) are Allison Gillespie and Michelle Guth. The two members of the Mortgage Advisory Board representing the Idaho Association of Mortgage Professionals (IAMP) are Chuck Anderson and Scott Stingley.

Regulatory Initiatives – The Department continues to be regularly involved in the efforts of the Conference of State Bank Supervisors (CSBS) and the American Association of Residential Mortgage Regulators (AARMR) to develop licensing and regulatory processes that meet the requirements of the S.A.F.E. Act. This includes participation by Bureau employees on various committees to develop procedural standards for licensing, including licensee testing, and continuing education to be implemented through the Nationwide Mortgage Licensing System (NMLS). Following the end of fiscal year 2011, authority for the oversight of the S.A.F.E. Act will transfer from the United States Department of Housing and Urban Development to the federal Consumer Financial Protection Bureau (CFPB). Throughout the fiscal year the Department has been in communication with the staff of the CFPB and will continue to work with its federal counterparts to ensure the effective administration of the S.A.F.E. Act in Idaho.

Mortgage Recovery Fund - The 2009 Idaho Legislature approved a mortgage recovery fund intended for use to reimburse persons damaged because of violations of the Idaho Residential Mortgage Practices Act. Mortgage licensees pay into the fund as a part of their initial license application and at the time of their annual license renewals. On an annual basis, the Department may apply up to \$50,000 of moneys accumulated in the mortgage recovery fund in excess of \$1,500,000 to: (i) fund the department's expenses in administering the mortgage recovery fund; (ii) develop and implement consumer education concerning the residential mortgage industry; (iii) contract for research projects for the state concerning the residential mortgage industry; (iv) fund the training expenses of department staff members and its attorneys concerning the residential mortgage industry; and (v) publish and distribute educational materials to licensees and applicants for licensure under the Idaho Residential Mortgage Practices Act. At the end of fiscal year 2011 the mortgage recovery fund balance was \$825,034. The Department projects that the fund will reach \$1,500,000 by the end of calendar year 2013.

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 Idaho Financial Fraud Prevention 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, the Continuing Care Disclosure Act,* and the *Idaho Financial Fraud Prevention 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.

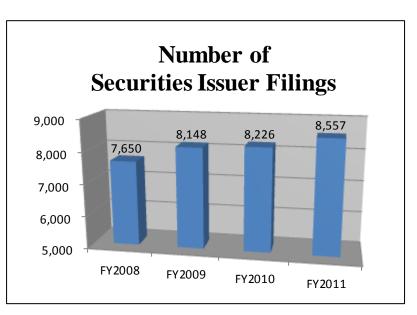
UNIFORM SECURITIES ACT

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. this With information. investors are empowered to reasoned make investment decisions.



Securities Issuer Filings – Generally, any public offering of newly issued securities must registered with be the 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. The accompanying chart includes data for all issuer filings made with the Bureau, including private placements.

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.



The Bureau is prepared for the "Investment Adviser Switch" which was set in motion when President Obama signed the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank") into law on July 21, 2010. Under Dodd-Frank, approximately 4,000 IAs

nationwide with assets under management of less than \$100 million will switch from federal to state regulation by mid-2012. Of these, approximately 13 are based in Idaho and will come under the Department's authority. As noted in the accompanying charts, the Bureau had oversight responsibility for nearly 1,567 broker-dealer firms and state registered investment adviser firms during FY 2011. This oversight also extends to more than 92,000 individuals who currently hold Idaho registrations as broker-dealer agents, investment adviser representatives and issuer agents. While the aggregate number of broker-dealer and investment advisory firms has been somewhat static in recent years, the number of agents has continued to climb to an all-time high this fiscal year of 92,517.

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 or in the process of resolution during the fiscal year approached \$90 million. During FY 2011, the Securities Bureau initiated or completed 16 enforcement actions involving 35 respondents or defendants. Details of the administrative and civil court actions filed or completed by the Bureau during fiscal 2010 are provided in Exhibit V.

Rescission, Refunds and Penalties – As a result of the Bureau's regulatory enforcement efforts, Idaho residents were offered, or awarded in judgments by the courts, nearly \$36 million in

refunds on their securities investments due to the administrative and civil enforcement actions described earlier. This also includes voluntary rescission offers made in accordance with the Act. Unfortunately, only a small portion of this amount is collectible by the Department. For this reason, the Department encourages victims of investment fraud to pursue their own remedies and not rely on the Department to recover any lost funds.

The Bureau assessed total fines and penalties of nearly \$500,000 in fiscal year 2011. Much of this amount is also uncollectible.

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 51 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 the laws of other states. It has proven effective in Department lawsuits against fraudulent commodity investment schemes, including several enforcement cases during recent years. One enforcement case was filed during fiscal 2011 that included alleged violations of the Idaho Commodity Code. Information relating to this case is included in Exhibit V.

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 payment of an advance fee 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 person has registered under this law.

SUPPORTING SERVICES BUREAU

This Bureau provides enterprise 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; maintenance of the Departments vehicles, and maintenance of the Department's information technology systems.

The Supporting Services Bureau completed several large projects fiscal year 2011 including: IT and fiscal or budgetary support for both CSBS and NASCUS accreditations, replacement of key equipment, updating the Strategic IT Plan, and overseeing increased design and transition into a comprehensive records management system. Several large databases including Mortgage Loan Originators, Mortgage Loan Originator Continuing Education, and a Case Management database to aid in investigation and enforcement actions, also all received significant synchronization capabilities and other upgrades.

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

EXHIBIT I

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

Director/Commissioner

Term of Office

C. C. Loveland W. S. Chaney	June 1, 1907 to March 6, 1909
William G. Cruse	
V. W. Platt	
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	
George W. Wedgwood	
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	
William J. Sewell	
E. F. Haworth	January 6, 1947 to August 15, 1952
Austin Schauweiler	
R. U. Spaulding	
J. L. McCarthy	June 1, 1961 to July 9, 1965
Tom D. McEldowney (Acting)	August 10, 1965 to January 31, 1967
John D. Silva	
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
	March 13, 1996 to Present
	•

EXHIBIT II

SUMMARY OF INCOME AND EXPENSES

July 1, 2010 through June 30, 2011

INCOME BY SOURCE	
Dedicated Account	\$11,201,859.71
TOTAL INCOME COLLECTED	\$11,201,859.71
APPROPRIATION	
Dedicated Account	\$5,514,200.00
TOTAL APPROPRIATION	\$5,514,200.00
EXPENDITURES	\$3,775,569.00
Personnel Costs	\$3,775,569.00 \$1,433,739.00
Operating Expenditures	\$78,493.00
Capital Outlay TOTAL EXPENDITURES	
	\$5,287,801.00
BALANCE OF APPROPRIATION	\$226,399.00
EXPENDITURES BY MAJOR CLASSES Salaries & Wages Personnel Benefits	\$2,819,211.00 \$956,358.00
Communication Services	\$40,997.00
Employee Development & Other Services	\$174,811.00
Professional Services	\$445,463.00
Repairs & Maintenance Service	\$24,743.00
Administrative Services	\$7,415.00
DP Services	\$77,366.00
Employee Travel	\$223,283.00
Materials & Supplies	\$87,006.00
Insurance	\$1,142.00
Rentals & Operating Leases	\$321,883.00
Miscellaneous Operating Expenditures	\$29,630.00
Capital Outlay	\$78,493.00
	\$5,287,801.00
TRANSFERRED TO GENERAL FUND	\$5,235,148.00

PERSONNEL STATUS	POSITIONS	POSITIONS	POSITIONS
June 30	AUTHORIZED	APPROPRIATED	FILLED
Full-Time Employees	54	54	53

FUND SOURCE B

Security Investor Fund (Securities Fines Only)	\$50.000.00
	\$50.000.00

EXPENDITURES

Personnel Costs	\$0.00
Operating Expenditures	\$49,484.00
Capital Outlay	\$0.00
	\$49,484.00

\$516.00

FUND SOURCE C

Mortgage Recovery Fund	\$825,034.07
TOTAL COLLECTED	\$825,034.07

EXHIBIT III

STATE OF IDAHO STATE-CHARTERED BANKS AND SAVINGS BANKS^{*} COMPARATIVE STATEMENT Close of Business 12/31/10 and 12/31/09 (000's Omitted)

	2010	2009	\$ Change
Cash and balances due from depository institutions			
Noninterest-bearing balances and currency and coin	96,830	125,801	-28,971
Interest-bearing balances	456,737	230,976	225,761
Securities:			
Held-to-maturity securities	115,155	116,298	-1,143
Available-for-sale securities	966,525	763,544	202,981
Federal funds sold and securities purchased under agreements to resell			
Federal funds sold	104,102	98,687	5,415
Securities purchased under agreements to resell			
Loans and lease financing receivables			
Loans and leases held for sale	74,101	65,778	8,323
Loans and leases, net of unearned income	3,807510	4,321,502	-513,992
LESS: Allowance for loan and lease losses	111,367	124,575	-13,208
Loans and leases, net of unearned income and allowance	3,696,143	4,196,927	-500,784
Trading assets	2,822	2,540	282
Premises and fixed assets (including capitalized leases)	161,881	163,175	-1,294
Other real estate owned	77,892	55,578	22,314
Intangible assets:			
Goodwill	33,089	44,751	-11,662
Other intangible assets	638	1,037	-399
Other assets	171,157	191,000	-19,843
Total assets	5,882,971	5,990,314	-107,343
Deposits:			
In domestic offices:	4,597,517	4,675,800	-78,283
Noninterest-bearing	1,045,596	1,011,540	34,053
Interest-bearing	3,551,921	3,664,260	-112,339
Federal funds purchased and securities sold under agreements to	- , ,-	- , ,	y
repurchase			
Federal funds purchased	5,500	46,275	-40,775
Securities sold under agreements to repurchase	230,716	207,786	22,930
Trading liabilities	2,822	2,540	22,930
Other borrowed money	326,618	320,904	5,714
Bank's liability on acceptances executed and outstanding	520,010	520,704	5,714
Subordinated notes and debentures			
Other liabilities	33,917	32,767	1,150
Total liabilities	5,197,090		<i>.</i>
Minority interest in consolidated subsidiaries	5,197,090	5,286,072	-88,982
Perpetual preferred stock and related surplus			
	107 512	00.845	7 669
Common stock	107,513	99,845 460.004	7,668
Surplus (exclude all surplus related to preferred stock)	503,546	460,094	43,452
Retained earnings and Other Equity Capital Components	74,821	144,303	-69,482
Total equity capital	685,880	704,242	-18,362
Total liabilities, minority interest, and equity capital	5,882,970	5,990,314	-107,344
	5,662,776	5,770,517	107,017

^{*} Includes only state-chartered banks headquartered in Idaho as of 12/31/2010 and 12/31/2009 Source: Federal Deposit Insurance Corporation

DECEMBER 31, 2010 BANK OF IDAHO IDAHO FALLS, IDAHO Charter No. 240 Charter Issued September 13, 1985 Incorporated July 17, 1985

OFFICERS: President & Chief Executive Officer: Park L. Price Chief Financial Officer: Jeff R. Manser	DIRECTORS: Emma L. Atchley; Steven E. Carr; Ralph M. Hartwell; Kenlon P. Johnson; Harold L. Latin; Park L. Price; John Rigby
Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	4,037
Interest-bearing balances	25,748
Securities:	
Held-to-maturity securities	335
Available-for-sale securities	24, 746
Federal funds sold and securities purchased under agreements to resell	0
Federal funds sold	0
Securities purchased under agreements to resell	0
Loans and lease financing receivables Loans and leases held for sale	12 697
Loans and leases, net of unearned income	12,687 164,582
LESS: Allowance for loan and lease losses	7,058
Loans and leases, net of unearned income and allowance	157,524
Trading assets	0
Premises and fixed assets (including capitalized leases)	4,977
Other real estate owned	4,003
Intangible assets:	,
Goodwill	0
Other intangible assets	0
Other assets	3,270
Total assets	237,297
Deposits:	
In domestic offices:	211,133
Noninterest-bearing	56,816
Interest-bearing	154,317
Federal funds purchased and securities sold under agreements to repurch	nase
Federal funds purchased	0
Securities sold under agreements to repurchase	3,286
Trading liabilities	0
Other borrowed money	4,607
Subordinated notes and debentures	0
Other liabilities	2,282
Total liabilities	221,308
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)	9,981
Retained earnings	4,452
Accumulated other comprehensive income	154
Other equity capital components	0
Total equity capital	15,989
	237,297

DECEMBER 31, 2010 bankcda COEUR D'ALENE, IDAHO Charter No. 258 Charter Issued May 3, 2001 Incorporated October 16, 2000

OFFICERS: CEO: Richard C. Emery

President: Wesley R. Veach

Vice President & Cashier: Kim Nordstrom

DIRECTORS: Richard C. Emery; Joseph Haley; C. Richard Nordstrom; John C. Shovic; Wayne R. Sorensen; Craig S. Tedmon Wesley R. Veach

Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	(000 s onnited) 1,640
Interest-bearing balances	10,693
Securities:	10,075
Held-to-maturity securities	0
Available-for-sale securities	3,903
Federal funds sold and securities purchased under agreements to resell	5,705
Federal funds sold	0
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	64,933
LESS: Allowance for loan and lease losses	1,543
Loans and leases, net of unearned income and allowance	63,385
Trading assets	0
Premises and fixed assets (including capitalized leases)	855
Other real estate owned	520
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	3,753
Total assets	84,749
Deposits:	
In domestic offices:	71,637
Noninterest-bearing	11,157
Interest-bearing	60,480
Federal funds purchased and securities sold under agreements to repurchase	00,100
Federal funds purchased	0
Securities sold under agreements to repurchase	0
Trading liabilities	0
Other borrowed money	3,423
Subordinated notes and debentures	0
Other liabilities	680
Total liabilities	75,740
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	6,442
Surplus (exclude all surplus related to preferred stock)	1,804
Retained earnings	733
Accumulated other comprehensive income	
	29
Other equity capital components	0
Total equity capital	9,008

DECEMBER 31, 2010 CITIZENS COMMUNITY BANK POCATELLO, IDAHO Charter No. 254 Charter Issued June 6, 1997 Incorporated April 17, 1996

OFFICERS:

DIRECTORS:

President & Chief Executive Officer: Ralph G. Cottle	J. Loren Azzola; Gary N. Blanchard; Marcia Johnson;
Chief Financial Officer: Terrill R. Schwartz	Ralph G. Cottle; Dave Hermansen; H. Brent Hill;
	Thomas J. Holmes; W. James Johnston; William A. Knick;
	James E. Lee; Diana B. Lyon; Alan E. Stanek; Jim Windmiller

Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	3,546
Interest-bearing balances	236
Securities:	0
Held-to-maturity securities	0
Available-for-sale securities	94,854
Federal funds sold and securities purchased under agreements to resell Federal funds sold	0
Securities purchased under agreements to resell	0
Loans and lease financing receivables	0
Loans and leases held for sale	8,556
Loans and leases, net of unearned income	160,416
LESS: Allowance for loan and lease losses	5,501
Loans and leases, net of unearned income and allowance	154,915
Trading assets	0
Premises and fixed assets (including capitalized leases)	6,970
Other real estate owned	1,848
Intangible assets:	
Goodwill	9,553
Other intangible assets	199
Other assets	8,894
Total assets	289,571
Deposits:	
In domestic offices:	207,473
Noninterest-bearing	34,889
Interest-bearing	172,584
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	5,500
Securities sold under agreements to repurchase	16,151
Trading liabilities	0
Other borrowed money	25,000
Subordinated notes and debentures	0
Other liabilities	1,232
Total liabilities	255,356
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)	19,262
Retained earnings	12,532
Accumulated other comprehensive income	228
Other equity capital components	0
Total equity capital	34,215
Total liabilities, minority interest, and equity capital	289,571

DECEMBER 31, 2010 COMMUNITY 1ST BANK POST FALLS, IDAHO Charter No. 261 Charter Issued May 21, 2007 Incorporated May 10, 2007

OFFICERS:	DIRECTORS:
Chief Executive Officer: David P. Bobbitt	William R. Basom; David P. Bobbitt;
President & Chief Operations Officer: Jerry C. Lyon	William R. Booth; David B. Holloway;
Chief Financial Officer: William R. Basom	Cyndie J. Lempsis; Jerry C. Lyon;
	Gary T. Schneidmiller; Jack P. Tibesar
Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	285
Interest-bearing balances	7,858
Securities:	7,030
Held-to-maturity securities	1,000
Available-for-sale securities	3,724
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	0
Securities purchased under agreements to resell	0
Loans and lease financing receivables	Ŭ
Loans and leases held for sale	0
Loans and leases, net of unearned income	39,111
LESS: Allowance for loan and lease losses	664
Loans and leases, net of unearned income and allowance	38,447
Trading assets	0
Premises and fixed assets (including capitalized leases)	807
Other real estate owned	141
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	453
Total assets	52,715
Deposits:	
In domestic offices:	43,081
Noninterest-bearing	4,056
Interest-bearing	39,025
Federal funds purchased and securities sold under agreements to repur	chase
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	185
Total liabilities	43,266
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)	5,313
Retained earnings	-1,185
Accumulated other comprehensive income	71
Other equity capital components	0
Total equity capital	9,449
Total liabilities, minority interest, and equity capital	52,715
rour nuometes, minority interest, and equity capital	52,715

DECEMBER 31, 2010 D. L. EVANS BANK **BURLEY, IDAHO** Charter No. 26 Charter Issued August 29, 1904 Incorporated August 23, 1904

DIRECTORS:

OFFICERS:	DIRECTORS:
Chief Executive Officer: John V. Evans, Jr.	John V. Evans, Jr.; John V. Evans, Sr.; Don S. Evans, Sr.;
President: John V. Evans, Sr.	Don S. Evans, Jr.; Larry L. Evans; M. DeLell Evans;
Chief Financial Officer: Brenda Sanford	Paula D. Evans; Martha Gilgen; Glen R. Kunau; Lex H. Kunau;
	James J. Lynch; Susan D. Evans Scarlett; David L. Evans

Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	12,523
Interest-bearing balances	73,383
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	225,090
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	471
Securities purchased under agreements to resell	0
Loans and lease financing receivables	
Loans and leases held for sale	8,329
Loans and leases, net of unearned income	567,543
LESS: Allowance for loan and lease losses	14,015
Loans and leases, net of unearned income and allowance	553,528
Trading assets	0
Premises and fixed assets (including capitalized leases)	30,249
Other real estate owned	17,303
Intangible assets:	_
Goodwill	0
Other intangible assets	0
Other assets	18,711
Total assets	939,587
Deposits:	
In domestic offices:	762,200
Noninterest-bearing	139,673
Interest-bearing	622,527
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	76,149
Trading liabilities	0
Other borrowed money	16,000
Subordinated notes and debentures	0
Other liabilities	4,802
Total liabilities	859,151
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	901
Surplus (exclude all surplus related to preferred stock)	56,725
Retained earnings	21,174
Accumulated other comprehensive income	1,635
Other equity capital components	0
Total equity capital	80,435
Total liabilities, minority interest, and equity capital	939,586
i otar naomues, minority interest, and equity capitar	757,580

DECEMBER 31, 2010 HOME FEDERAL BANK NAMPA, IDAHO Charter No. 264 Charter Issued May 31, 2011 Incorporated January 1, 1920

OFFICERS: President & Chief Executive Officer: Len E. Williams Chief Financial Officer: Eric S. Nadeau	DIRECTORS: Charles N. Hedermark; Brad J. Little; Richard J. Navarro; James R. Stamey; Daniel L. Stevens; Robert A. Tintsman; Len E. Williams
Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	16,407
Interest-bearing balances	194,724
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	405,683
Federal funds sold and securities purchased under agreements to resell	0
Federal funds sold	0
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	588,500
LESS: Allowance for loan and lease losses	12,418
Loans and leases, net of unearned income and allowance	576,082
Trading assets	0
Premises and fixed assets (including capitalized leases)	25,488
Other real estate owned	25,143
Intangible assets:	
Goodwill	6,497
Other intangible assets	0
Other assets	107,619
Total assets	1,357,643
Deposits:	
In domestic offices:	1,137,393
Noninterest-bearing	43,498
Interest-bearing	1,093,895
Federal funds purchased and securities sold under agreements to repurc	
Federal funds purchased	0
Securities sold under agreements to repurchase	0
Trading liabilities	0
Other borrowed money	60,369
Subordinated notes and debentures	0
Other liabilities	$\frac{11,793}{1,209,555}$
Total liabilities	1,209,555
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	1
Surplus (exclude all surplus related to preferred stock)	84,935
Retained earnings	62,603
Accumulated other comprehensive income	-1,149
Other equity capital components	1,698
Total equity capital	148,088
Total liabilities, minority interest, and equity capital	1,357,643

DECEMBER 31, 2010 IDAHO BANKING COMPANY BOISE, IDAHO Charter No. 250 Charter Issued October 3, 1996 Incorporated May 14, 1996

OFFICERS:	DIRECTORS:
President & Chief Executive Officer: James Latta	V. Dale Babbitt; M. Dean Buffington;
Chief Credit Officer: Gary Quast	B. Randy Harris; Thomas F. Kealey;
Chief Financial Officer: Bruce Barfuss	James C. Latta; Tom Morgan;
	John S. Simko
Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	12,163
Interest-bearing balances	82
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	26,909
Federal funds sold and securities purchased under agreements to resell Federal funds sold	810
Securities purchased under agreements to resell	0
Loans and lease financing receivables	
Loans and leases held for sale	2,243
Loans and leases, net of unearned income	129,802
LESS: Allowance for loan and lease losses	9,474
Loans and leases, net of unearned income and allowance	120,328
Trading assets	0
Premises and fixed assets (including capitalized leases)	3,961
Other real estate owned	13,742
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	5,415
Total assets	185,653
Deposits:	
In domestic offices:	161,599
Noninterest-bearing	23,967
Interest-bearing	137,632
Federal funds purchased and securities sold under agreements to repurchase	se
Federal funds purchased	0
Securities sold under agreements to repurchase	214
Trading liabilities	0
Other borrowed money	14,000
Subordinated notes and debentures	0
Other liabilities	785
Total liabilities	176,598
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)	21,546
Retained earnings	-16,788
Accumulated other comprehensive income	-2
Other equity capital components	0
Total equity capital	9,055
Total liabilities, minority interest, and equity capital	185,653
i otar naomues, mmorny micrest, and equity capitar	163,033

DECEMBER 31, 2010 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: Don Driscoll; Justin Dye; James F. Fletcher; Daniel C. Krahn; Larry LaRocco; Greg P. Lovell; Mark J. Miller; Daniel A. Neef; William Rawlings

Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	(000 3 0inited) 888
Interest-bearing balances	18,787
Securities:	10,707
Held-to-maturity securities	0
Available-for-sale securities	3,001
Federal funds sold and securities purchased under agreements to resell	5,001
Federal funds sold	0
Securities purchased under agreements to resell	0
Loans and lease financing receivables	0
Loans and leases held for sale	945
Loans and leases, net of unearned income	52,137
LESS: Allowance for loan and lease losses	1,025
Loans and leases, net of unearned income and allowance	51,112
Trading assets	0
Premises and fixed assets (including capitalized leases)	297
Other real estate owned	1.064
Intangible assets:	1,004
Goodwill	0
Other intangible assets	0
Other assets	1,311
Total assets	77.405
1 otal assets	77,403
Deposits:	
In domestic offices:	68,281
Noninterest-bearing	10,417
Interest-bearing	57,864
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	4,000
Subordinated notes and debentures	0
Other liabilities	314
Total liabilities	72,595
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	14,649
Surplus (exclude all surplus related to preferred stock)	14,049
Retained earnings	-9,846
Accumulated other comprehensive income	-9,840 7
Other equity capital components	/ 0
Total equity capital	4,810
Total liabilities, minority interest, and equity capital	77,405
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DECEMBER 31, 2010 IDAHO INDEPENDENT BANK COEUR D'ALENE, IDAHO Charter No. 246 Charter Issued September 7, 1993 Incorporated November 3, 1992

OFFICERS:	DIRECTORS:
Chief Executive Officer: Jack W. Gustavel	Arthur Brown; Michael J. Coughlin;
President & Chief Operating Officer: Kurt R. Gustavel	Roy L. Eiguren; Jack W. Gustavel;
Senior Vice President & Cashier: Paul H. Montreuil	Kurt R. Gustavel; Terry Gustavel;
	Jerald J. Jaeger; Gary L. Mahn
Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	5,530
Interest-bearing balances	65,744
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	29,274
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	1,400
Securities purchased under agreements to resell	0
Loans and lease financing receivables	
Loans and leases held for sale	3,905
Loans and leases, net of unearned income	287,253
LESS: Allowance for loan and lease losses	9,853
Loans and leases, net of unearned income and allowance	277,400
Trading assets	2,822
Premises and fixed assets (including capitalized leases)	20,467
Other real estate owned	10,699
Intangible assets:	0
Goodwill Other inter sible essets	0
Other intangible assets Other assets	0 24,613
Total assets	441,854
Deposits:	
In domestic offices:	368,857
Noninterest-bearing	112,924
Interest-bearing	255,933
Federal funds purchased and securities sold under agreements to repurchase	200,700
Federal funds purchased	0
Securities sold under agreements to repurchase	26,258
Trading liabilities	2,822
Other borrowed money	9,000
Subordinated notes and debentures	0
Other liabilities	4,482
Total liabilities	385,161
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	35,626
Surplus (exclude all surplus related to preferred stock)	44,497
Retained earnings	-12,330
Accumulated other comprehensive income	-62
Other equity capital components	-11,038
Total equity capital	56,693
Total liabilities, minority interest, and equity capital	441,854

DECEMBER 31, 2010 IDAHO TRUST BANK BOISE, IDAHO Charter No. 263 Charter Issued December 4, 2008 Incorporated December 4, 2008

OFFICERS: Chief Executive Officer: Daniel W. Prohaska President: Thomas F. Prohaska Chief Financial Officer: Geri L. Bullard	DIRECTORS: Arthur J. Berry; John B. Dimmer; Stanley K. Fornander; Richard H. Jones; Daniel W. Prohaska; Thomas F. Prohaska
Cash and halanges due from denository institutions	(000's omitted)
Cash and balances due from depository institutions Noninterest-bearing balances and currency and coin.	533
Interest-bearing balances	26,595
Securities:	20,575
Held-to-maturity securities	0
Available-for-sale securities	1,402
Federal funds sold and securities purchased under agreements to resel	
Federal funds sold	428
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	53,739
LESS: Allowance for loan and lease losses	1,199
Loans and leases, net of unearned income and allowance	52,540
Trading assets	0
Premises and fixed assets (including capitalized leases)	3,952
Other real estate owned	927
Intangible assets:	155
Goodwill Other intangible assets	155 0
Other assets	2,743
Total assets	89,275
	<u>_</u>
Deposits:	70.205
In domestic offices:	72,305
Noninterest-bearing	6,725
Interest-bearing Federal funds purchased and securities sold under agreements to repu	65,580
Federal funds purchased and securities sold under agreements to repu	0
Securities sold under agreements to repurchase	12
Trading liabilities	0
Other borrowed money	2,500
Subordinated notes and debentures	2,000
Other liabilities	209
Total liabilities	72,526
Minovity interest in songelideted subsidienti-	0
Minority interest in consolidated subsidiaries	000
Perpetual preferred stock and related surplus Common stock	22,007
Surplus (exclude all surplus related to preferred stock)	3,861
Retained earnings	-9,094
Accumulated other comprehensive income	-9,094
Other equity capital components	-33
Total equity capital	16,749
Total liabilities, minority interest, and equity capital	89,275

DECEMBER 31, 2010 IRELAND BANK MALAD, IDAHO Charter No. 7 Charter Issued May 1, 1899 Incorporated December 8, 1892

OFFICERS:

DIRECTORS:

President & Chief Executive Officer: Bruce Lowry Chief Financial Officer: Lawrence G. Knudsen Timothy P. Deeg; R. Blair Hawkes; David G. Jenkins; Randall E. Marshall; Jeff Schutte; Randon W. Wilson

Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	2,338
Interest-bearing balances	3,782
Securities:	
Held-to-maturity securities	17,358
Available-for-sale securities	31,562
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	0
Securities purchased under agreements to resell	0
Loans and lease financing receivables	
Loans and leases held for sale	862
Loans and leases, net of unearned income	141,907
LESS: Allowance for loan and lease losses	1,804
Loans and leases, net of unearned income and allowance	140,103
Trading assets	0
Premises and fixed assets (including capitalized leases)	1,713
Other real estate owned	1,654
Intangible assets:	
Goodwill	222
Other intangible assets	0
Other assets	7,784
Total assets	207,378
Deposits:	
In domestic offices:	179,591
Noninterest-bearing	47,367
Interest-bearing	132,224
Federal funds purchased and securities sold under agreements to repurchase	_
Federal funds purchased	0
Securities sold under agreements to repurchase	835
Trading liabilities	0
Other borrowed money	7,333
Subordinated notes and debentures	0
Other liabilities	1,096
Total liabilities	188,855
	0
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	705
Surplus (exclude all surplus related to preferred stock)	6,367
Retained earnings	11,792
Accumulated other comprehensive income	-341
Other equity capital components	10 522
Total equity capital	18,523
	207.270
Total liabilities, minority interest, and equity capital	207,378

DECEMBER 31, 2010 MOUNTAIN WEST BANK COEUR D'ALENE, IDAHO Charter No. 256 Charter Issued June 30, 1999 Incorporated June 28, 1999

Chief Executive Officer: Russell Porter	DIRECTORS Mick Blodnick; Don Shepard; Dennis Downer
President & Chief Operating Officer: Rod Colwell	Bradley E. Dugdale, Jr.; James English
Chief Financial Officer: Dennis Durfee	Tom Gibson; Jon Hippler; Russ Porter; Steven Tester
Cinci i manciai Officer. Dennis Durice	Stephen Meyer; Charles Nipp; J. Michael Patano
Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	12,241
Interest-bearing balances	7,905
Securities:	
Held-to-maturity securities	(
Available-for-sale securities	245,225
Federal funds sold and securities purchased under agreemen	nts to resell
Federal funds sold	20,400
Securities purchased under agreements to resell	C
Loans and lease financing receivables	
Loans and leases held for sale	33,107
Loans and leases, net of unearned income	788,028
LESS: Allowance for loan and lease losses	35,064
Loans and leases, net of unearned income and allowance	752,964
Trading assets	(
Premises and fixed assets (including capitalized leases)	30,717
Other real estate owned	8,481
Intangible assets:	
Goodwill	23,159
Other intangible assets	3129
Other assets	37,168
Total assets	1,171,496
Deposits:	
In domestic offices:	770,058
Noninterest-bearing	214,071
Interest-bearing	555,987
Federal funds purchased and securities sold under agreement	
Federal funds purchased	
Securities sold under agreements to repurchase	28,952
Trading liabilities	C
Other borrowed money	188,986
Subordinated notes and debentures	C
Other liabilities	4,736
Total liabilities	992,732
Minority interest in consolidated subsidiaries	C
Perpetual preferred stock and related surplus	(
Common stock	1,789
Surplus (exclude all surplus related to preferred stock)	1,785
Retained earnings	41,413
Accumulated other comprehensive income	41,413 -1,234
Other equity capital components	-1,252
	170 765
Total equity capital	178,765

DECEMBER 31, 2010 PANHANDLE STATE BANK SANDPOINT, IDAHO Charter No. 238 Charter Issued May 15, 1981 Incorporated December 19, 1980

Held-to-maturity securities 22,21 Available-for-sale securities 183,08 Federal funds sold and securities purchased under agreements to resell 0 Securities purchased under agreements to resell 0 Loans and lease financing receivables 3,42 Loans and leases held for sale 3,42 Loans and leases, net of unearned income 575,72 LESS: Allowance for loan and lease losses 12,45 Cohans and leases, net of unearned income and allowance 563,26 Trading assets 0 Premises and fixed assets (including capitalized leases) 39,45 Other real estate owned 4,422 Intangible assets: 310 Goodwill 0 Other intangible assets 41,311 Total assets 10,004,400 Deposits: 180,400 In domestic offices: 780,722 Noninterest-bearing 170,400 Interst-bearing 170,400 Interst-bearing 170,400 Interst-bearing 0 Federal funds purchased 0 Subordinated notes and debentures 0 Other	Interest-bearing balances	132,693
Interest-bearing balances 132,69 Securities: 22,21' Available-for-sale securities 183,08 Federal funds sold and securities purchased under agreements to resell 6 Coans and lease financing receivables 0 Loans and lease financing receivables 3,42: Loans and leases, net of unearned income 573,72! LESS: Allowance for loan and lease losses 12,45: Loans and leases, net of unearned income and allowance 563,26: Trading assets 0 Goodwill 0 Other real estate owned 4,422 Intangible assets 31 Total assets 31 Obther intangible assets 31 Total assets 31 Indomestic offices: 780,72: Noninterest-bearing 170,400 Interest-bearing 100,400 Interest-bearing 105,111 Trading liabilities 0 Other ontage and securities sold under agreements to repurchase 0 Federal funds purchased 0 Securities sold under agreements to repurchase 0 Indomestic offices:	Cash and balances due from depository institutions	(000's omitted) 14,218
Held-to-maturity securities 22,21 Available-for-sale securities purchased under agreements to resell 183,08 Federal funds sold and securities purchased under agreements to resell 0 Loans and lease funancing receivables 3,42 Loans and lease, het of uncarned income 575,72 LESS: Allowance for loan and lease losses 12,45 Loans and leases, net of uncarned income and allowance 563,26 Trading assets 0 Other real estate owned 4,42 Intangible assets 314 Other intangible assets 314 Other sets 314 Total assets 1,004,400 Interest-bearing 170,400 Interest-bearing 105,11* Trading liabilities 34,000 Securities sold under agreements to repurchase 458 Federal funds purchased 458 Trading liabil		
Available-for-sale securities 183,08 Federal funds sold and securities purchased under agreements to resell 0 Federal funds sold 0 Securities purchased under agreements to resell 0 Loans and lease financing receivables 3,42: Loans and leases, net of unearned income 575,722 LESS: Allowance for loan and lease losses 12,45: Loans and leases, net of unearned income and allowance 563,266 Trading assets 0 Premises and fixed assets (including capitalized leases) 39,45: Other real estate owned 44,42: Intangible assets: 310 Goodwill 0 Other rasets 41,311 Total assets 41,311 India secto 1,004,400 Deposits: 1 In domestic offices: 780,72: Noninterest-bearing 100,414 Federal funds purchased and securities sold under agreements to repurchase 60 Federal funds purchased 0 Sccurities sold under agreements to repurchase 0 Federal funds purchased 0 Scuruities sold under agreements to repurchase		
Available-for-sale securities 183,08 Federal funds sold and securities purchased under agreements to resell 0 Federal funds sold 0 Securities purchased under agreements to resell 0 Loans and lease financing receivables 3,42: Loans and leases, net of unearned income 575,722 LESS: Allowance for loan and lease losses 12,45: Loans and leases, net of unearned income and allowance 563,266 Trading assets 0 Premises and fixed assets (including capitalized leases) 39,45: Other real estate owned 44,42: Intangible assets: 310 Goodwill 0 Other rasets 41,311 Total assets 41,311 India secto 1,004,400 Deposits: 1 In domestic offices: 780,72: Noninterest-bearing 100,414 Federal funds purchased and securities sold under agreements to repurchase 60 Federal funds purchased 0 Sccurities sold under agreements to repurchase 0 Federal funds purchased 0 Scuruities sold under agreements to repurchase	Held-to-maturity securities	22,217
Federal funds sold 0 Securities purchased under agreements to resell 0 Loans and lease financing receivables 3,42: Loans and leases held for sale 3,42: Loans and leases, net of uncarned income 575,72: LESS: Allowance for loan and lease losses 12,45: Loans and leases, net of uncarned income and allowance 563,26: Trading assets 0 Premises and fixed assets (including capitalized leases) 39,45: Other real estate owned 44,42: Intangible assets: 310 Goodwill 0 Other sasets 41,310 Total assets 1,004,400 Deposits: 10,004,400 In domestic offices: 780,72: Noninterest-bearing 170,400 Interest-bearing 100,400 Interest-bearing 100,400 Securities sold under agreements to repurchase 0 Securities sold under agreements to repurchase 0 Federal funds purchased 0 Securities sold under agreements to repurchase 0 Subordinated notes and debentures 0		183,081
Securities purchased under agreements to resell 0 Loans and lease financing receivables 3,422 Loans and leases, net of unearned income 575,722 LESS: Allowance for loan and lease losses 12,455 Loans and leases, net of unearned income and allowance 563,266 Trading assets 0 Premises and fixed assets (including capitalized leases) 39,455 Other real estate owned 44,422 Intangible assets: 310 Goodwill 0 Other state owned 41,311 Total assets 41,311 Total assets 1,004,400 Deposits: 780,722 In domestic offices: 780,722 Noninterest-bearing 610,314 Federal funds purchased and securities sold under agreements to repurchase 610,314 Scurities sold under agreements to repurchase 610,5117 Trading liabilities 34,000 Other borrowed money 34,000 Subordinated notes and debentures 0 Other liabilities 45,58 Total liabilities 924,422 Minority interest in consolidated subsidiaries 0 </td <td>Federal funds sold and securities purchased under agreements to</td> <td>o resell</td>	Federal funds sold and securities purchased under agreements to	o resell
Loans and lease financing receivables3,42Loans and leases held for sale3,42Loans and leases held for sale3,42Loans and leases held for sale575,72LESS: Allowance for loan and lease losses12,45Leass and leases, net of unearned income and allowance563,26Trading assets0Premises and fixed assets (including capitalized leases)39,45Other real estate owned4,422Intangible assets:311Goodwill0Other intangible assets311Total assets41,311Total assets1,004,400Deposits:1,004,400In domestic offices:780,722Noninterest-bearing170,400Interest-bearing100,111Federal funds purchased and securities sold under agreements to repurchase610,31-Federal funds purchased and securities sold under agreements to repurchase0Securities sold under agreements to repurchase0Fother liabilities4,58-Total inabilities924,42Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock2,666Surplus (exclude all surplus related to preferred stock)91,866Retained earnings-13,757Accumulated other comprehensive income-797Other equity capital components-13,757	Federal funds sold	0
Loans and leases held for sale3,422Loans and leases, net of unearned income575,72LESS: Allowance for loan and lease losses12,455Loans and leases, net of unearned income and allowance563,265Trading assets0Premises and fixed assets (including capitalized leases)39,455Other real estate owned44,22Intangible assets:310Goodwill0Other intangible assets310Other assets41,311Total assets41,311Total assets1,004,400Deposits:780,722Noninterest-bearing170,400Interest-bearing170,400Interest-bearing100,311Federal funds purchased and securities sold under agreements to repurchase0Scourities sold under agreements to repurchase0Gother inabilities34,000Subordinated notes and debentures0Other borrowed money34,000Subordinated notes and debentures0Other liabilities45,58Total liabilities924,422Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock2,666Surplus (exclude all surplus related to preferred stock)91,86Retained earnings-13,757Accunulated other comprehensive income-797Other capity capital components-13,757	Securities purchased under agreements to resell	0
Loans and leases, net of unearned income575,72LESS: Allowance for loan and lease losses12,45:Loans and leases, net of unearned income and allowance563,263Trading assets39,45:Other real estate owned4,422Intangible assets:310Goodwill0Other real estate owned41,314Other assets310Other assets310Other assets1,004,400Deposits:1,004,400In domestic offices:780,72: Noninterest-bearingIn domestic offices:780,72: Noninterest-bearingFederal funds purchased0Securities sold under agreements to repurchase0Federal funds purchased0Subordinated notes and debentures0Other liabilities4,58Trading liabilities4,58Other liabilities4,58Other liabilities4,58Other liabilities4,58Other liabilities0Other liabilities2,666Surplus (exclude all surplus related surplus Common stock0Surplus (exclude all surplus related to preferred stock)91,866Retained earnings 		
LESS: Allowance for loan and lease losses12,45:Loans and leases, net of unearned income and allowance563,26Trading assets39,45:Other real estate owned4,42:Intangible assets:310Goodwill0Other intangible assets310Other assets310Other assets310Other assets41,311Total assets1,004,400Deposits:780,722In domestic offices:780,722Noninterest-bearing1610,312Federal funds purchased0Securities sold under agreements to repurchase0Federal funds purchased0Securities sold under agreements to repurchase0Trading liabilities0Other borrowed money34,000Subordinated notes and debentures0Other liabilities45.58Total liabilities45.58Other liabilities45.58Other liabilities0Other liabilities0Other liabilities0Other liabilities2,666Surplus (exclude all surplus related to preferred stock)91,866Retained earnings-13,757Accumulated other comprehensive income-799Other equity capital components-799		3,425
Loans and leases, net of uncarned income and allowance563,260Trading assets39,453Premises and fixed assets (including capitalized leases)39,453Other real estate owned44,422Intangible assets:311Goodwill0Other intagible assets41,310Other assets41,310Inter assets1,004,400Deposits:10In domestic offices:780,722Noninterest-bearing170,400Interest-bearing110,400Federal funds purchased0Sccurities sold under agreements to repurchase0Federal funds purchased0Sccurities sold under agreements to repurchase0Other iabilities0Other liabilities0Other liabilities458Total liabilities224,422Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock2,666Surplus (exclude all surplus related to preferred stock)91,866Retained earnings-13,757Accumulated other comprehensive income-799Other equity capital components-799	Loans and leases, net of unearned income	575,720
Trading assets 0 Premises and fixed assets (including capitalized leases) 39,455 Other real estate owned 4,429 Intangible assets: 310 Goodwill 0 Other intangible assets 310 Other assets 41,310 Total assets 1,004,400 Deposits: 1 In domestic offices: 780,722 Noninterest-bearing 610,314 Federal funds purchased and securities sold under agreements to repurchase 610,314 Federal funds purchased 0 Securities sold under agreements to repurchase 1005,117 Trading liabilities 0 Other borrowed money 34,000 Subordinated notes and debentures 0 Other liabilities 458 Total liabilities 458 Total liabilities 425 Other liabilities 458 Cotal liabilities 458 Other liabilities 458 Total liabilities 458 Total liabilities 458 Other liabilities 458 Other l	LESS: Allowance for loan and lease losses	12,455
Premises and fixed assets (including capitalized leases) 39,452 Other real estate owned 4,422 Intangible assets: 310 Other intangible assets 310 Other assets 41,314 Total assets 41,314 Total assets 1,004,400 Deposits: 1,004,400 In domestic offices: 780,722 Noninterest-bearing 170,400 Interest-bearing 170,400 Interest-bearing 610,31- Federal funds purchased and securities sold under agreements to repurchase 60 Securities sold under agreements to repurchase 0 Securities sold under agreements to repurchase 0 Subordinated notes and debentures 0 Other liabilities 4,58 Total liabilities 4,58 Total liabilities 4,58 Total liabilities 924,42 Minority interest in consolidated subsidiaries 0 Perpetual preferred stock and related surplus 0 Common stock 2,666 Surplus (exclude all surplus related to preferred stock) 91,866 Retained earnings<	Loans and leases, net of unearned income and allowance	563,265
Other real estate owned4,422Intangible assets: Goodwill310Other intangible assets310Other assets41,310Total assets41,310Total assets1,004,400Deposits: In domestic offices: Noninterest-bearing780,722Noninterest-bearing170,400Interest-bearing610,314Federal funds purchased and securities sold under agreements to repurchase610,314Federal funds purchased and securities sold under agreements to repurchase0Securities sold under agreements to repurchase0Other borrowed money34,000Subordinated notes and debentures Other liabilities4,588Total liabilities4,588Total liabilities924,422Minority interest in consolidated subsidiaries Perpetual preferred stock and related surplus Common stock0Prepetual preferred stock and related surplus Common stock2,666Surplus (exclude all surplus related to preferred stock) Accumulated other comprehensive income-13,757Other equity capital components-000000000000000000000000000000000000	Trading assets	0
Intangible assets:(1)Goodwill(1)Other intangible assets310Other assets41,310Total assets1,004,400Deposits:1In domestic offices:780,722Noninterest-bearing170,400Interest-bearing610,314Federal funds purchased and securities sold under agreements to repurchase(1)Federal funds purchased and securities sold under agreements to repurchase(1)Federal funds purchased(1)Securities sold under agreements to repurchase(1)Trading liabilities(1)Other borrowed money34,000Subordinated notes and debentures(2)Other liabilities4,58Total liabilities(2)Minority interest in consolidated subsidiaries(2)Perpetual preferred stock and related surplus(2)Common stock2,666Surplus (exclude all surplus related to preferred stock)91,866Retained earnings-13,753Accumulated other comprehensive income-79'Other equity capital components(2)	Premises and fixed assets (including capitalized leases)	39,452
GoodwillOOther intangible assets310Other assets41,310Total assets1,004,400Deposits:1In domestic offices:780,722Noninterest-bearing170,400Interest-bearing610,314Federal funds purchased and securities sold under agreements to repurchase60Securities sold under agreements to repurchase60Subordinated notes and debentures60Other borrowed money34,000Subordinated notes and debentures60Other liabilities4,588Total liabilities224,422Minority interest in consolidated subsidiaries60Perpetual preferred stock and related surplus60Common stock2,666Surplus (exclude all surplus related to preferred stock)91,866Retained earnings-13,757Accumulated other comprehensive income-790Other equity capital components-790		4,429
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Total assets1,004,400Deposits: In domestic offices: Noninterest-bearing780,722Noninterest-bearing170,400Interest-bearing610,314Federal funds purchased and securities sold under agreements to repurchase600Securities sold under agreements to repurchase000Securities sold under agreements to repurchase000Other borrowed money34,000Subordinated notes and debentures000Other liabilities4,588Total liabilities4,588Total liabilities924,422Minority interest in consolidated subsidiaries000Perpetual preferred stock and related surplus Common stock000Surplus (exclude all surplus related to preferred stock)91,866Retained earnings Accumulated other comprehensive income-799Other equity capital components-000	-	310
Deposits: 780,72: In domestic offices: 780,72: Noninterest-bearing 170,400 Interest-bearing 610,314 Federal funds purchased and securities sold under agreements to repurchase 610,314 Federal funds purchased and securities sold under agreements to repurchase 610,314 Federal funds purchased 015,117 Trading liabilities 0105,117 Other borrowed money 34,000 Subordinated notes and debentures 010 Other liabilities 4,584 Total liabilities 924,424 Minority interest in consolidated subsidiaries 010 Perpetual preferred stock and related surplus 010 Common stock 2,663 Surplus (exclude all surplus related to preferred stock) 91,866 Retained earnings -13,755 Accumulated other comprehensive income -799 Other equity capital components -799		41,310
In domestic offices:780,722Noninterest-bearing170,409Interest-bearing610,314Federal funds purchased and securities sold under agreements to repurchase610,314Federal funds purchased and securities sold under agreements to repurchase105,117Trading liabilities0Other borrowed money34,000Subordinated notes and debentures0Other liabilities4,584Total liabilities4,584Total liabilities924,424Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock2,666Surplus (exclude all surplus related to preferred stock)91,866Retained earnings-13,755Accumulated other comprehensive income-799Other equity capital components-100	Total assets	1,004,400
In domestic offices:780,722Noninterest-bearing170,409Interest-bearing610,314Federal funds purchased and securities sold under agreements to repurchase610,314Federal funds purchased and securities sold under agreements to repurchase105,117Trading liabilities0Other borrowed money34,000Subordinated notes and debentures0Other liabilities4,584Total liabilities924,424Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock2,666Surplus (exclude all surplus related to preferred stock)91,866Retained earnings-13,755Accumulated other comprehensive income-799Other equity capital components-0	Deposits:	
Noninterest-bearing170,400Interest-bearing610,314Federal funds purchased and securities sold under agreements to repurchase(100,114)Federal funds purchased(100,114)Securities sold under agreements to repurchase(100,114)Trading liabilities(100,114)Other borrowed money(100,114)Subordinated notes and debentures(100,114)Other liabilities(100,114)Other liabilities(100,114)Other liabilities(100,114)Other liabilities(100,114)Other liabilities(100,114)Other liabilities(100,114)Common stock(100,114)Surplus (exclude all surplus related to preferred stock)(113,125)Accumulated other comprehensive income(113,125)Accumulated other comprehensive income(113,125)Other equity capital components(113,125)Other equity capital components(113,125)		780,723
Interest-bearing610,314Federal funds purchased and securities sold under agreements to repurchase Federal funds purchased Securities sold under agreements to repurchase(105,117Trading liabilities(105,117Trading liabilities(105,117Other borrowed money(105,117Subordinated notes and debentures(105,117Other liabilities(105,117Total liabilities(105,117Total liabilities(105,117Minority interest in consolidated subsidiaries(105,117Perpetual preferred stock and related surplus(105,117Common stock(105,117Surplus (exclude all surplus related to preferred stock)(115,117Retained earnings Accumulated other comprehensive income(113,755Accumulated other comprehensive income(113,755Other equity capital components(113,755Other equity capital components(113,755		170,409
Federal funds purchased and securities sold under agreements to repurchaseFederal funds purchased(105,117Securities sold under agreements to repurchase(105,117Trading liabilities(105,117Other borrowed money(107,117Subordinated notes and debentures(107,117Other liabilities(107,117Total liabilities(107,117Minority interest in consolidated subsidiaries(107,117Perpetual preferred stock and related surplus(107,117Common stock(107,117Surplus (exclude all surplus related to preferred stock)(113,755Accumulated other comprehensive income(113,755Accumulated other comprehensive income(113,755Other equity capital components(113,755Other equity capital components(113,755Supplies (Stock and related surplus income(113,755Other equity capital components(113,755Other equity capital components(113,755 </td <td></td> <td>610,314</td>		610,314
Federal funds purchased(10)Securities sold under agreements to repurchase105,117Trading liabilities(10)Other borrowed money34,000Subordinated notes and debentures(10)Other liabilities(11)Total liabilities(11)Minority interest in consolidated subsidiaries(11)Perpetual preferred stock and related surplus(11)Common stock(2,663)Surplus (exclude all surplus related to preferred stock)91,864Retained earnings(-13,755)Accumulated other comprehensive income(-79)Other equity capital components(11)		
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Trading liabilities34,000Other borrowed money34,000Subordinated notes and debentures0Other liabilities4,58Total liabilities924,424Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock2,666Surplus (exclude all surplus related to preferred stock)91,866Retained earnings-13,759Accumulated other comprehensive income-797Other equity capital components0		105,117
Other borrowed money34,000Subordinated notes and debentures0Other liabilities4,58Total liabilities924,42Minority interest in consolidated subsidiaries924,42Minority interest in consolidated surplus0Common stock2,663Surplus (exclude all surplus related to preferred stock)91,864Retained earnings-13,755Accumulated other comprehensive income-797Other equity capital components0		0
Other liabilities4,58Total liabilities924,42Minority interest in consolidated subsidiaries92Perpetual preferred stock and related surplus92Common stock2,663Surplus (exclude all surplus related to preferred stock)91,864Retained earnings-13,759Accumulated other comprehensive income-799Other equity capital components0		34,000
Total liabilities924,424Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock2,663Surplus (exclude all surplus related to preferred stock)91,864Retained earnings-13,759Accumulated other comprehensive income-797Other equity capital components0	Subordinated notes and debentures	0
Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock2,66Surplus (exclude all surplus related to preferred stock)91,86Retained earnings-13,75Accumulated other comprehensive income-79Other equity capital components0	Other liabilities	4,584
Perpetual preferred stock and related surplus()Common stock2,66Surplus (exclude all surplus related to preferred stock)91,86Retained earnings-13,75Accumulated other comprehensive income-79Other equity capital components()	Total liabilities	924,424
Perpetual preferred stock and related surplus0Common stock2,66Surplus (exclude all surplus related to preferred stock)91,86Retained earnings-13,75Accumulated other comprehensive income-79Other equity capital components0	Minority interact in consolidated subsidiouiss	0
Common stock2,660Surplus (exclude all surplus related to preferred stock)91,860Retained earnings-13,759Accumulated other comprehensive income-790Other equity capital components000		000
Surplus (exclude all surplus related to preferred stock)91,86Retained earnings-13,75Accumulated other comprehensive income-79Other equity capital components0		
Retained earnings-13,759Accumulated other comprehensive income-79'Other equity capital components0		
Accumulated other comprehensive income -79' Other equity capital components		
Other equity capital components		
10tai equity capital (9,97)		
	Other equity capital components	

DECEMBER 31, 2010 SYRINGA BANK BOISE, IDAHO Charter No. 251 Charter Issued February 13, 1997 Incorporated March 8, 1996

OFFICERS:	DIRECTORS:
President & Chief Executive Officer: Scott Gibson	Hilario "Larry" J. Arguinchona;
Senior V.P. & Controller: Brian Heim	Scott J. Chandler; Don Deters; LaVern Gentry;
	Terry L. Hayden; Louann Krueger; Cheryl A. Larabee;
	Harvey L. Neef; Jody Olson; Bruce C. Parker
Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	6,870
Interest-bearing balances	205
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	11,840
Federal funds sold and securities purchased under agreeme	ents to resell
Federal funds sold	12,422
Securities purchased under agreements to resell	0
Loans and lease financing receivables	
Loans and leases held for sale	72
Loans and leases, net of unearned income	186,250
LESS: Allowance for loan and lease losses	4,290
Loans and leases, net of unearned income and allowance	181,960
Trading assets	0
Premises and fixed assets (including capitalized leases) Other real estate owned	2,764 7,549
Intangible assets:	7,549
Goodwill	0
Other intangible assets	0
Other assets	4,466
Total assets	228,148
Deposits:	
In domestic offices:	192,378
Noninterest-bearing	25,638
Interest-bearing	166,740
Federal funds purchased and securities sold under agreeme	ents to repurchase
Federal funds purchased	0
Securities sold under agreements to repurchase	0
Trading liabilities	0
Other borrowed money	20,269
Subordinated notes and debentures	0
Other liabilities	2,111
Total liabilities	214,758
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)	43,765
Retained earnings	-35,558
Accumulated other comprehensive income	101
Other equity capital components	0
Total equity capital	13,390
Total liabilities, minority interest, and equity capital	228,148

DECEMBER 31, 2010 THE BANK OF COMMERCE IDAHO FALLS, IDAHO Charter No. 225 Charter Issued March 30, 1959 Incorporated March 30, 1959

Cash and balances due from depository institutions (000° s omitted) Noninterest-bearing balances 62,956 Securities 74,245 Available-for-sale securities 63,718 Federal funds sold and securities purchased under agreements to resell 6 Federal funds sold and securities purchased under agreements to resell 0 Coans and lease financing receivables 0 Loans and leases, net of uncarned income 464,662 LESS: Allowand leases, net of uncarned income and allowance 457,961 Codwill 0 Premises and fixed assets 0 Premises and fixed assets 0 Other assets 0 Codwill 0 Other assets 0 Other assets 0 Deposits: 0 Interest-bearing 107,600 Other assets 0 Other assets 0 Total assets 0 Other assets 0 Total assets 0 Other assets 0 Trading labilities 0 Other assets 0 Trading labilities 0 Other assets 0 Trading labilities 0 Other borrowed money 0 </th <th>OFFICERS: President & Chief Executive Officer: Thomas J. Romrell Chief Financial Officer: Ronald M. Johnson</th> <th>DIRECTORS: Ross Morrell (Mick) Bowen; Julian G. Cowley; Calvin Erb; Richard H. Groberg; Giles Newman; William Reed; Thomas J. Romrell</th>	OFFICERS: President & Chief Executive Officer: Thomas J. Romrell Chief Financial Officer: Ronald M. Johnson	DIRECTORS: Ross Morrell (Mick) Bowen; Julian G. Cowley; Calvin Erb; Richard H. Groberg; Giles Newman; William Reed; Thomas J. Romrell
Noninterest-bearing balances and currency and coin.19,377 Interest-bearing balances19,377 62,956Securities:Held-to-maturity securities74,245Available-for-sale securities purchased under agreements to resell63,718Federal funds sold68,171Securities purchased under agreements to resell0Loans and leases held for sale0Loans and leases held for sale0Loans and leases, net of unearned income464,662LESS: Allowance for loan and lease losses6,701Loans and leases, net of unearned income and allowance457,961Trading assets0Premises and fixed assets (including capitalized leases)14,350Other real estate owned5,532Intangible assets0Goodwill0Other intangible assets0Total assets0Trading liabilities01770.070Deposits:10,760In domestic offices:644,221Noninterest-bearing179,062Trading liabilities0Other barange0Securities sold under agreements to repurchase0Securities sold under agreements to repurchase0Trading liabilities0Other hinds purchased and securities sold under agreements to repurchase0Securities sold under agreements to repurchase0Trading liabilities0Other borrowed money0Other borrowed money0Subordinated notes and debentures0<	Cash and balances due from depository institutions	(000's omitted)
Securities: 74.245 Held-to-maturity securities 74.245 Available-for-sale securities 63.718 Federal funds sold and securities purchased under agreements to resell 68.171 Securities purchased under agreements to resell 0 Loans and leases field for sale 0 Loans and leases, net of unearned income 464.662 LESS: Allowance for loan and lease losses 6.701 Loans and leases, net of unearned income and allowance 457.961 Trading assets 0 Premises and fixed assets (including capitalized leases) 14.350 Other real estate owned 5.532 Intangible assets: 0 Goodwill 0 Other intangible assets 0 Total assets 0 In domestic offices: 10.760 Trading liabilities 0 Other assets 0 Scurities sold under agreements to repurchase 0 Federal funds purchased 0 Scurities sold under agreements to repurchase 0 Federal funds purchased 0 Scurities sold under agreements to repurchase 0		19,377
Held-to-maturity securities 74,245 Available-for-sale securities purchased under agreements to resell 63,718 Federal funds sold and securities purchased under agreements to resell 0 Loans and lease financing receivables 0 Loans and leases, net of uncarned income and allowance 464,662 LESS: Allowance for loan and lease losses 6,701 Loans and leases, net of uncarned income and allowance 457,961 Trading assets 0 Other real estate owned 0 Intangible assets 0 Goodwill 0 Other rintangible assets 0 Goodwill 0 Other intangible assets 0 Goodwill 0 Other intangible assets 0 Total assets 10,760 Total assets 0 Other intangible assets 0 In domestic offices: 644,221 Noiniterest-bearing 179,062 Interest-bearing 179,062 Interest-bearing 0 Subordinated notes and debentures 0 Other inshibitis 61,08 <t< td=""><td></td><td>62,956</td></t<>		62,956
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Federal funds sold and securities purchased under agreements to resell 68,171 Securities purchased under agreements to resell 0 Loans and lease financing receivables 0 Loans and leases, net of unearned income 464,662 LSS: Allowance for loan and lease losses 6,701 Loans and leases, net of unearned income and allowance 457,961 Trading assets 0 Premises and fixed assets (including capitalized leases) 14,350 Other real estate owned 5,532 Intangible assets: 0 Goodwill 0 Other raise state owned 10,760 Total assets 0 Other raise offices: 0 In domestic offices: 644,221 Noninterest-bearing 179,062 Interest-bearing 179,062 Interest-bearing 0 Securities sold under agreements to repurchase 0 Subordinated notes and debentures 0 Other insibilities 0 Other insibilities 61,08 Total liabilities 61,08 Total liabilities 650,329 Minority interest		
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LESS: Allowance for loan and lease losses6,701Loans and leases, net of unearned income and allowance457,961Trading assets0Premises and fixed assets (including capitalized leases)14,350Other real estate owned5,532Intangible assets:0Goodwill0Other intangible assets0Other assets0Other assets0Other assets0Total assets0Deposits:777,070Pederal funds purchased and securities sold under agreements to repurchase0Federal funds purchased0Scurities sold under agreements to repurchase0Trading liabilities0Other liabilities0Other liabilities0Subordinated notes and debentures0Other liabilities0Common stock1,000Suprofinated notes and related surplus0Common stock1,000Suprofice and netated surplus0Common stock1,000Supruls (exclude all surplus related to preferred stock)29,200Minority interest in comprehensive income792Other equity capital0Total equity capital0		
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Other assets10,760Total assets777,070Deposits:644,221In domestic offices:644,221Noninterest-bearing179,062Interest-bearing465,159Federal funds purchased and securities sold under agreements to repurchase0Securities sold under agreements to repurchase0Trading liabilities0Other borrowed money0Subordinated notes and debentures0Other liabilities6108Total liabilities650,329Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Surplus (exclude all surplus related to preferred stock)29,200Retained earnings0Accumulated other comprehensive income792Other equity capital components0Total equity capital0	-	0
Other assets10,760Total assets777,070Deposits:644,221In domestic offices:644,221Noninterest-bearing179,062Interest-bearing465,159Federal funds purchased and securities sold under agreements to repurchase0Securities sold under agreements to repurchase0Trading liabilities0Other borrowed money0Subordinated notes and debentures0Other liabilities650,329Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital0	Other intangible assets	0
Deposits:644,221In domestic offices:644,221Noninterest-bearing179,062Interest-bearing465,159Federal funds purchased and securities sold under agreements to repurchase0Federal funds purchased0Securities sold under agreements to repurchase0Trading liabilities0Other borrowed money0Subordinated notes and debentures0Other liabilities6,108Total liabilities650,329Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital0	-	10,760
In domestic offices:644,221Noninterest-bearing179,062Interest-bearing465,159Federal funds purchased and securities sold under agreements to repurchase0Securities sold under agreements to repurchase0Trading liabilities0Other borrowed money0Subordinated notes and debentures0Other liabilities6,108Total liabilities650,329Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income0Other equity capital0Interest of the comprehensive income0Other equity capital126,741	Total assets	777,070
Noninterest-bearing179,062Interest-bearing465,159Federal funds purchased and securities sold under agreements to repurchase0Federal funds purchased0Securities sold under agreements to repurchase0Trading liabilities0Other borrowed money0Subordinated notes and debentures0Other liabilities6,108Total liabilities650,329Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Italication0Ital equity capital126,741	Deposits:	
Interest-bearing465,159Federal funds purchased and securities sold under agreements to repurchaseFederal funds purchased0Securities sold under agreements to repurchase0Trading liabilities0Other borrowed money0Subordinated notes and debentures0Other liabilities6,108Total liabilities650,329Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741	In domestic offices:	644,221
Federal funds purchased and securities sold under agreements to repurchase 0 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 6,108 Total liabilities 6,108 Total liabilities 0 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 95,749 Accumulated other comprehensive income 0 Total equity capital components 0 Other equity capital components 0		
Federal funds purchased0Securities sold under agreements to repurchase0Trading liabilities0Other borrowed money0Subordinated notes and debentures0Other liabilities6,108Total liabilities650,329Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741	· ·	
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Trading liabilities0Other borrowed money0Subordinated notes and debentures0Other liabilities6,108Total liabilities650,329Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741		
Other borrowed money0Subordinated notes and debentures0Other liabilities6,108Total liabilities650,329Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741		
Subordinated notes and debentures0Other liabilities6,108Total liabilities650,329Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741		
Other liabilities6,108Total liabilities650,329Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741		
Total liabilities650,329Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741		-
Minority interest in consolidated subsidiaries0Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741		
Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741		050,527
Perpetual preferred stock and related surplus0Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741	Minority interest in consolidated subsidiaries	0
Common stock1,000Surplus (exclude all surplus related to preferred stock)29,200Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741		0
Retained earnings95,749Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741		1,000
Accumulated other comprehensive income792Other equity capital components0Total equity capital126,741		
Other equity capital components 0 Total equity capital 126,741		
Total equity capital		
		-
Total liabilities, minority interest, and equity capital 777,070	Total equity capital	126,741
	Total liabilities, minority interest, and equity capital	777,070

DECEMBER 31, 2010 WESTERN CAPITAL BANK BOISE, IDAHO Charter No. 262 Charter Issued March 25, 2008 Incorporated March 31, 2008

OFFICERS:

DIRECTORS:

President & Chief Executive Officer: Rob R. Perez Chief Financial Officer: Neva J. McCormick Tami Michele Chafin; Jeffery D. Gow; William K. Ilett; Rob. R Perez; Steve D. Wasson

Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	641
Interest-bearing balances	20,070
Securities:	,
Held-to-maturity securities	0
Available-for-sale securities	18,196
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	0
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	57,326
LESS: Allowance for loan and lease losses	716
Loans and leases, net of unearned income and allowance	56,610
Trading assets	0
Premises and fixed assets (including capitalized leases)	350
Other real estate owned	0
Intangible assets:	0
Goodwill	0
Other intangible assets	0
Other assets	506
Total assets	96,373
Deposits:	
In domestic offices:	63,980
Noninterest-bearing	8,425
Interest-bearing	55,555
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	311
Total liabilities	64,291
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	3,500
Surplus (exclude all surplus related to preferred stock)	32,564
Retained earnings	-4,067
Accumulated other comprehensive income	85
Other equity capital components	0
Total equity capital	32,082
Total liabilities, minority interest, and equity capital	96,373
	20,375

DECEMBER 31, 2010 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; Shanon Taylor; Fred T. Thompson, Jr.

	(000's Omitted)
ASSETS	
Cash	7
Loan Receivable	349
Less: Allowance for Loan Losses	14
Net Loans and Leases	335
Interest Receivable	74
Prepaid Expenses	0
Other Investments	1,707
Total Assets	2.123
-	,
LIABILITIES AND STOCKHOLDERS' EQUITY	
Accounts Payable	0
Accrued Expenses	0
Notes Payable	350
Accrued Interest	
Total Liabilities	360
Total Elabilities	500
STOCKHOLDERS' EQUITY	
Common Stock	1.137
	627
Retained Earnings	0
Accumulated Other Comprehensive Activity	
Total Stockholders' Equity	1,763
	2 1 2 2
Total Liabilities and Stockholders' Equity	2,123

Financial Institutions Operating in Idaho ⁴				
Institution Name	Address	City	State	Zip
Ireland Bank	386 N. Main Street	Aberdeen	ID	83210
Wells Fargo Bank, N.A.	165 S. Main Street	Aberdeen	ID	83210
D. L. Evans Bank	Main and Market Streets	Albion	ID	83311
Keybank, N.A.	290 Idaho Street	American Falls	ID	83211
The Bank of Commerce	590 Tyhee Avenue	American Falls	ID	83211
U.S. Bank, N.A.	588 Fort Hall Avenue	American Falls	ID	83211
Wells Fargo Bank, N.A.	246 Idaho Street	American Falls	ID	83211
JP Morgan Chase Bank, N.A.	1711 S. 25 th East	Ammon	ID	83406
The Bank of Commerce	3113 S. 25 th East	Ammon	ID	83406
Zions First National Bank	2540 E. Sunnyside Road	Ammon	ID	83406
The Bank of Commerce	120 W. Grand Avenue	Arco	ID	83213
Wells Fargo Bank, N.A.	205 W. Grand Avenue	Arco	ID	83213
Bank of Idaho	600 Main Street	Ashton	ID	83420
Keybank, N.A.	24 S. 5 th Street	Ashton	ID	83420
U.S. Bank, N.A.	625 S. Main Street	Bellevue	ID	83313
U.S. Bank, N.A.	731 N. Main Street, Suite A	Bellevue	ID	83313
Keybank, N.A.	15 N. Ash Street	Blackfoot	ID	83221
The Bank of Commerce	624 Jensen Grove Dr.	Blackfoot	ID	83221
U.S. Bank, N.A.	9 S. Ash Street	Blackfoot	ID	83221
Washington Federal Savings & Loan	715 W. Judicial	Blackfoot	ID	83221
Assoc.				
Wells Fargo Bank, N.A.	109 South Broadway	Blackfoot	ID	83221
Zions First National Bank	1350 Parkway Drive #1	Blackfoot	ID	83221
Bank of America, N.A.	1200 Main Street	Boise	ID	83702
Bank of America, N.A.	280 S. Capitol Boulevard	Boise	ID	83702
Bank of the Cascades	121 N. 9 th Street, Suite 100	Boise	ID	83702
Bank of the Cascades	121 N. 9 th Street, Suite 100	Boise	ID	83702
Bank of the West	827 W. Idaho Street	Boise	ID	83702
Banner Bank	950 W. Bannock, Suite 100	Boise	ID	83702
D. L. Evans Bank	$213 \text{ N}.9^{\text{th}}$ Street	Boise	ID	83702
Home Federal Bank	800 W. State Street	Boise	ID	83702
Idaho Independent Bank	317 N. 9 th Street	Boise	ID	83702
Idaho Independent Bank	401 W. Front Street	Boise	ID	83702
Idaho Trust Bank	888 W. Broad Street	Boise	ID	83702
JP Morgan Chase Bank, N.A.	175 N. Capitol Boulevard	Boise	ID ID	83702
Keybank, N.A.	702 W. Idaho Street	Boise	ID	83702
Mountain West Bank	800 W. Bannock Street	Boise	ID	83702
Mountain West Bank	433 N. 16 th Street	Boise	ID ID	83702
Sterling Savings Bank	420 W. Main Street	Boise	ID ID	83702
Syringa Bank	999 Main Street, Suite 100	Boise	ID ID	83702
U.S. Bank, N.A.	101 S. Capitol Boulevard, Suite 102	Boise	ID ID	83702
U.S. Bank, N.A.	111 S. 27 th Street	Boise	ID ID	83702 83702
	1688 State Street	Boise		
U.S. Bank, N.A. U.S. Bank, N.A.	205 N. 10 th Street	Boise	ID ID	83702 83702
Washington Federal Savings & Loan	1001 W. Idaho Street	Boise	ID	83702
Assoc.	001 West Damas 1 Street	Daire	ID	02702
Washington Trust Bank	901 West Bannock Street	Boise	ID	83702
Wells Fargo Bank, N.A.	877 W. Main Street	Boise	ID ID	83702
Western Capital Bank	1750 Front Street	Boise	ID ID	83702
Zions First National Bank	890 Main Street	Boise	ID	83702

⁴ Source: FDIC Summary of Deposits

Institution NameAddressCityStateZip				
D. L. Evans Bank	3845 W. State Street	Boise	ID	83703
JP Morgan Chase Bank, N.A.	3845 W. State Street 3550 W. State Street	Boise	ID ID	83703 83703
Keybank, N.A.	6700 W. State Street	Boise	ID ID	83703
U.S. Bank, N.A.	3614 W. State Street	Boise	ID ID	83703
U.S. Bank, N.A.	7100 W. State Street	Boise	ID ID	83703
Wells Fargo Bank, N.A.	4630 W. State Street	Boise	ID ID	83703
Bank of America, N.A.	4050 W. State Street 421 N. Cole Road	Boise	ID ID	83703
Bank of America, N.A. Bank of America, N.A.	9780 W. Fairview Avenue	Boise	ID ID	83704
Bank of the West	9140 W. Emerald	Boise	ID ID	83704
Banner Bank	6850 Fairview Avenue	Boise	ID ID	83704
Home Federal Bank	10440 W. Ustick Road	Boise	ID ID	83704
Idaho Banking Company	6010 Fairview Avenue	Boise	ID ID	83704
JP Morgan Chase Bank, N.A.	373 N. Milwaukee Street	Boise	ID ID	83704
Keybank, N.A.	3149 N. Cole Road	Boise	ID ID	83704
Keybank, N.A.	8157 W. Fairview Avenue	Boise	ID ID	83704
U.S. Bank, N.A.	10556 Fairview Avenue	Boise	ID ID	83704
U.S. Bank, N.A.	7230 Fairview Avenue	Boise	ID ID	83704
Washington Federal Savings & Loan	10150 Fairview Avenue	Boise	ID ID	83704
Assoc.	10150 Failview Avenue	Doise	ID	03704
Washington Federal Savings & Loan	3197 N. Cole Road	Boise	ID	83704
Assoc. Weshington Trust Bonk	7020 Ecimicus Ascense	Doise	ID	92704
Washington Trust Bank	7930 Fairview Avenue 7700 Fairview Avenue	Boise Boise	ID ID	83704 83704
Wells Fargo Bank, N.A. Zions First National Bank			ID ID	
	7402 Fairview Avenue	Boise	ID ID	83704
Bank of America, N.A. Bank of the Cascades	3563 S. Federal Way 801 S. Vista Avenue	Boise Boise	ID ID	83705
D. L. Evans Bank	1600 S. Vista Avenue	Boise	ID ID	83705 83705
JP Morgan Chase Bank, N.A.	3527 Federal Way SE, Ste A	Boise	ID ID	83705
Keybank, N.A.	4920 Overland Street	Boise	ID ID	83705
Keybank, N.A.	875 E. Parkcenter Boulevard	Boise	ID ID	83705
U.S. Bank, N.A.	1103 Vista Avenue	Boise	ID ID	83705
U.S. Bank, N.A.	1515 S. Orchard	Boise	ID ID	83705
U.S. Bank, N.A.	2730 Airport Way	Boise	ID ID	83705
Washington Federal Savings & Loan	10 S. Orchard Street	Boise	ID ID	83705
Assoc.	10 S. Ofenard Street	Doise	ID	83705
Wells Fargo Bank, N.A.	1400 Vista Avenue	Boise	ID	83705
Zions First National Bank	1910 University Drive	Boise	ID ID	83705
Home Federal Bank	871 Parkcenter Boulevard	Boise	ID ID	83705
Idaho Banking Company	673 E. Parkcenter Boulevard	Boise	ID ID	83700
JP Morgan Chase Bank, N.A.		Boise	ID ID	83700
JP Morgan Chase Bank, N.A. JP Morgan Chase Bank, N.A.	2423 Apple Street 5120 W. Franklin Road	Boise	ID ID	83700
		Boise	ID ID	83700
Keybank, N.A.	1111 Broadway Avenue			
Syringa Bank	1299 N. Orchard Street 909 E. Park Center Boulevard	Boise Boise	ID ID	83706 83706
U.S. Bank, N.A.		Boise	ID ID	83700
U.S. Bank, N.A.	1000 Broadway Avenue			
U.S. Bank, N.A. Washington Federal Sourings & Lean	301 W. Parkcenter Boulevard	Boise	ID ID	83706
Washington Federal Savings & Loan Assoc.	1789 Broadway Avenue	Boise	ID	83706
Wells Fargo Bank, N.A.	1205 Broadway Avenue	Boise	ID	83706
Wells Fargo Bank, N.A.	421 N. Orchard Avenue	Boise	ID	83706
Wells Fargo Bank, N.A.	505 W. Bannock Street	Boise	ID	83706
Wells Fargo Bank, N.A.	818 E. Boise Avenue	Boise	ID	83706
Bank of the Cascades	6981 Overland Road	Boise	ID	83709
Banner Bank	1550 S. Kimball Way	Boise	ID	83709

Financial Institutions Operating in Idaho				
Institution Name	Address	City	State	Zip
Idaho Independent Bank	8351 W. Overland Road	Boise	ID ID	83709
JP Morgan Chase Bank, N.A.	10751 W. Overland Rd., #D	Boise	ID	83709
Mountain West Bank	80 S. Cole Road	Boise	ID	83709
U.S. Bank, N.A.	10500 Overland Road	Boise	ID	83709
U.S. Bank, N.A.	10541 Overland Road	Boise	ID	83709
U.S. Bank, N.A.	8534 Franklin Road	Boise	ID	83709
Washington Trust Bank	7802 W. Overland Road	Boise	ID	83709
Wells Fargo Bank, N.A.	10342 Overland Road	Boise	ID	83709
D. L. Evans Bank	7450 W. Emerald Street	Boise	ID	83713
Home Federal Bank	3630 N. Eagle Road	Boise	ID	83713
U.S. Bank, N.A.	10700 Ustick Road	Boise	ID	83713
U.S. Bank, N.A.	4700 N. Eagle Road	Boise	ID	83713
Wells Fargo Bank, N.A.	4594 N. Eagle Road	Boise	ID	83713
Wells Fargo Bank, N.A.	3150 N. Five Mile Road	Boise	ID	83713
Zions First National Bank	6176 N. Eagle	Boise	ID	83713
JP Morgan Chase Bank, N.A.	6490 S. Federal Way	Boise	ID	83716
U.S. Bank, N.A.	6560 S. Federal Way	Boise	ID	83716
Mountain West Bank	7186 1 st Street	Bonners Ferry	ID	83805
Panhandle State Bank	6750 Main Street	Bonners Ferry	ID	83805
Wells Fargo Bank, N.A.	6764 Main Street	Bonners Ferry	ID	83805
First Federal Savings Bank of Twin Falls	123 Broadway Avenue, North	Buhl	ID	83316
The Farmers National Bank of Buhl	914 Main Street	Buhl	ID	83316
U.S. Bank, N.A.	819 Main Street	Buhl	ID	83316
Wells Fargo Bank, N.A.	200 Broadway North	Buhl	ID	83316
D. L. Evans Bank	2281 Overland Avenue	Burley	ID	83318
D. L. Evans Bank	397 N. Overland Avenue	Burley	ID	83318
First Federal Savings Bank of Twin Falls	1095 East Main Street	Burley	ID	83318
First Federal Savings Bank of Twin	2059 Overland Avenue	Burley	ID	83318
Falls		D 1	ID	00010
Keybank, N.A.	1301 Overland Avenue	Burley	ID	83318
U.S. Bank, N.A.	112 E. Main Street	Burley	ID	83318
Wells Fargo Bank, N.A.	130 E. Main Street	Burley	ID	83318
Wells Fargo Bank, N.A.	937 E. Main Street	Burley	ID	83318
Zions First National Bank	102 W. Main Street	Burley	ID	83318
Bank of the Cascades	1110 Blaine	Caldwell	ID	83605
Home Federal Bank	923 Dearborn Street	Caldwell	ID	83605
Idaho Independent Bank	620 S. Kimball Avenue	Caldwell	ID	83605
JP Morgan Chase Bank, N.A.	1018 Blaine Street	Caldwell	ID	83605
Keybank, N.A.	309 S. 9 th Street	Caldwell	ID	83605
U.S. Bank, N.A.	607 Cleveland Boulevard	Caldwell	ID	83605
Washington Federal Savings & Loan	515 Cleveland Boulevard	Caldwell	ID	83605
Assoc.		~		
Wells Fargo Bank, N.A.	2500 Blaine Street	Caldwell	ID	83605
Wells Fargo Bank, N.A.	823 Cleveland Boulevard	Caldwell	ID	83605
Zions First National Bank	509 S. Kimball Avenue	Caldwell	ID	83605
Panhandle State Bank	506 S. 10 th Avenue	Caldwell	ID	83606
Wells Fargo Bank, N.A.	5218 Cleveland Boulevard	Caldwell	ID	83607
U.S. Bank, N.A.	95 N. Superior Street	Cambridge	ID	83610
Ireland Bank	20449 Main Street	Carey	ID	83320
Sterling Savings Bank	101 S. Main Street	Cascade	ID	83611
Wells Fargo Bank, N.A.	Fourth & Main	Challis	ID	83226
AmericanWest Bank	223 W. Ironwood Drive	Coeur d'Alene	ID	83814

Institution Value Address Up Address Bank of America, NA. 501 W. Appleway Coeur d'Alene ID 83814 Bank of America, NA. 501 W. Appleway Coeur d'Alene ID 83814 Idaho Independent Bank 1260 W. Riverstone Drive Coeur d'Alene ID 83814 Idaho Trust Bank 608 Northwest Boulevard, Suite A Coeur d'Alene ID 83814 Idaho Trust Bank 125 fromwood Drive Coeur d'Alene ID 83814 Vuis Bank, NA. 1603 N. 4" Strete Coeur d'Alene ID 83814 U.S. Bank, NA. 1603 N. 4" Strete Coeur d'Alene ID 83814 U.S. Bank, NA. 1603 N. 4" Strete Coeur d'Alene ID 83814 U.S. Bank, NA. 104 W. Propeway Coeur d'Alene ID 83814 Wells Fargo Bank, NA. 201 F. Sherman Avenue Coeur d'Alene ID 83814 Wells Fargo Bank, NA. 301 E. Sherman Avenue Coeur d'Alene ID 83815 Inhand Northwest Bank 106 Sherman Avenue C	Financial Institutions Operating in Idano						
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Keybank, N.A.1024 S. Washington AvenueEmmettID83617U.S. Bank, N.A.200 S. WashingtonEmmettID83617U.S. Bank, N.A640 Highway 16EmmettID83617Wells Fargo Bank, N.A.102 W. Main StreetEmmettID83617U.S. Bank, N.A.512 Soldier RoadFairfieldID83327U.S. Bank, N.A.98 Highway 30FilerID83328Bank of the Cascades1850 N. Whitley DriveFruitlandID83619Keybank, N.A.1515 N. Whitley DriveFruitlandID83619Panhandle State Bank1710 N. Whitley Drive, Suite AFruitlandID83619			-				
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Bank of the Cascades1850 N. Whitley DriveFruitlandID83619Keybank, N.A.1515 N. Whitley DriveFruitlandID83619Panhandle State Bank1710 N. Whitley Drive, Suite AFruitlandID83619							
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Panhandle State Bank 1710 N. Whitley Drive, Suite A Fruitland ID 83619							
Zions First National Bank909 NW 16 th Street, Suite BFruitlandID83619		1/10 N. Whitley Drive, Suite A					
	Zions First National Bank	909 NW 16 ^{•••} Street, Suite B	Fruitland	ID	83619		

Tratitation Norse	Financial Institutions Operating in Idan		State.	7
Institution Name	Address	City	State	<u> </u>
Bank of the Cascades	4128 Adams Street	Garden City	ID ID	83714
Home Federal Bank	7319 W. State Street	Garden City	ID ID	83714
JP Morgan Chase Bank, N.A.	5425 Chinden Boulevard	Garden City	ID ID	83714
Mountain West Bank	7107 W. State Street	Garden City	ID ID	83714
State Bank & Trust	7661 W. Riverside Drive, Suite 105	Garden City	ID	83714
U.S. Bank, N.A.	5312 Chinden Boulevard	Garden City	ID	83714
Washington Trust Bank	7309 W. State Street	Garden City	ID	83714
Wells Fargo Bank, N.A.	6788 Glenwood St.	Garden City	ID	83714
Wells Fargo Bank, N.A.	3301 W. Chinden Boulevard	Garden City	ID	83714
Wells Fargo Bank, N.A.	102 E. Walnut Street	Genesee	ID	83832
U.S. Bank, N.A.	4 E. Idaho Avenue	Glenns Ferry	ID	83623
Bank of America, N.A.	645 Main Street	Gooding	ID	83330
Panhandle State Bank	746 Main Street	Gooding	ID	83330
Wells Fargo Bank, N.A.	445 Main Street	Gooding	ID	83330
Zions First National Bank	502 Main Street	Gooding	ID	83330
Ireland Bank	1 N. Main	Grace	ID	83241
U.S. Bank, N.A.	300 S. Main Street	Grand View	ID	83624
Sterling Savings Bank	147 W. Main Street	Grangeville	ID	83530
U.S. Bank, N.A.	104 E. Main Street	Grangeville	ID	83530
Wells Fargo Bank, N.A.	162 E. Main Street	Grangeville	ID	83530
U.S. Bank, N.A.	111 W. Hagerman Avenue	Hagerman	ID	83332
Bank of America, N.A.	215 N. Main Street	Hailey	ID	83333
D. L. Evans Bank	12 E. Bullion Street	Hailey	ID	83333
Mountain West Bank	206 N. Main Street	Hailey	ID	83333
U.S. Bank, N.A.	314 N. Main Street	Hailey	ID	83333
Wells Fargo Bank, N.A.	100 N. Main Street	Hailey	ID	83333
Zions First National Bank	111 N. 1 st Avenue, Suite 1H	Hailey	ID	83333
AmericanWest Bank	255 W. Hayden Avenue	Hayden	ID	83835
Bank of America, N.A.	162 W. Hayden Avenue	Hayden	ID	83835
bankcda	200 W. Honeysuckle Avenue	Hayden	ID	83835
Idaho Independent Bank	8882 N. Government Way	Hayden	ID	83835
Mountain West Bank	305 West Prairie Avenue	Hayden	ID	83835
Sterling Savings Bank	8060 N. Cornerstone Drive	Hayden	ID	83835
U.S. Bank, N.A.	197 W. Prairie Avenue	Hayden	ID	83835
Washington Trust Bank	8050 N. Government Way	Hayden	ID	83835
Wells Fargo Bank, N.A.	204 W. Hayden Avenue	Hayden	ID	83835
U.S. Bank, N.A.	255 Main Street	Hazelton	ID	83335
U.S. Bank, N.A.	112 S. Main Street	Homedale	ID	83628
Bank of America, N.A.	110 N. Holmes Avenue	Idaho Falls	ID	83401
JP Morgan Chase Bank, N.A.	1555 Northgate Mile, SuiteA	Idaho Falls	ID	83401
The Bank of Commerce	1455 Northgate Mile	Idaho Falls	ID	83401
U.S. Bank, N.A.	585 First Street	Idaho Falls	ID	83401
Wells Fargo Bank, N.A.	305 First Street	Idaho Falls	ID	83401
Wells Fargo Bank, N.A.	400 S. Woodruff Avenue	Idaho Falls	ID	83401
Bank of Idaho	151 N. Ridge Avenue	Idaho Falls	ID	83402
Citizens Community Bank	900 S. Utah Avenue	Idaho Falls	ID	83402
The Bank of Commerce	1730 W. Broadway Street	Idaho Falls	ID	83402
The Bank of Commerce	375 Yellowstone Avenue	Idaho Falls	ID	83402
U.S. Bank, N.A.	1555 W. Broadway	Idaho Falls	ID	83402
U.S. Bank, N.A.	330 Shoup Avenue	Idaho Falls	ID	83402
Wells Fargo Bank, N.A.	320 A Street	Idaho Falls	ID	83402
Wells Fargo Bank, N.A.	635 N. Skyline Drive	Idaho Falls	ID	83402
Zions First National Bank	1235 S. Utah Avenue	Idaho Falls	ID	83402
Bank of Idaho	1800 Channing Way	Idaho Falls	ID	83403
		Louis I uno		00100

	ncial Institutions Operating in Ic			
Institution Name	Address	City	State	Zip
Keybank, N.A.	1625 Northgate Mile	Idaho Falls	ID	83403
D. L. Evans Bank	888 E. 17 th Street	Idaho Falls	ID	83404
The Bank of Commerce	1770 E. 17 th Street	Idaho Falls	ID	83404
Wells Fargo Bank, N.A.	1798 Hitt Road	Idaho Falls	ID	83404
Wells Fargo Bank, N.A.	576 E. 17 th Street	Idaho Falls	ID	83404
Keybank, N.A.	501 Broadway	Idaho Falls	ID	83405
Washington Federal Savings & Loan	500 N. Capital	Idaho Falls	ID	83405
Assoc.	L			
Citizens Community Bank	2797 S. 25 th East	Idaho Falls	ID	83406
Keybank, N.A.	2655 E. 17 th Street	Idaho Falls	ID	83406
Ireland Bank	Main Street and Highway 30	Inkom	ID	83245
Bank of Idaho	3976 U.S. Highway 20	Island Park	ID	83429
D. L. Evans Bank	1014 S. Lincoln Avenue	Jerome	ID	83338
First Federal Savings Bank of Twin	1515 S. Lincoln Avenue	Jerome	ID	83338
Falls			12	00000
The Farmers National Bank of Buhl	1441 S. Lincoln Avenue	Jerome	ID	83338
U.S. Bank, N.A.	300 S. Lincoln Avenue	Jerome	ID	83338
Washington Federal Savings & Loan	140 E. Main Street	Jerome	ID	83338
Assoc.			12	00000
Wells Fargo Bank, N.A.	100 E. Main Street	Jerome	ID	83338
Wells Fargo Bank, N.A.	320 Idaho Street	Kamiah	ID	83536
AmericanWest Bank	120 Railroad Avenue	Kellogg	ID	83837
Panhandle State Bank	302 W. Cameron Avenue	Kellogg	ID	83837
U.S. Bank, N.A.	7 McKinley Avenue	Kellogg	ID	83837
Wells Fargo Bank, N.A.	100 McKinley Avenue	Kellogg	ID	83837
Wells Fargo Bank, N.A.	501 E. Main Street	Kendrick	ID	83537
Bank of America, N.A.	311 Main Street	Ketchum	ID	83340
Bank of the West	600 Sun Valley Road	Ketchum	ID	83340
D. L. Evans Bank	680 Sun Valley Road	Ketchum	ID	83340
Idaho Independent Bank	491 N. Main Street, Suite 101	Ketchum	ID	83340
Mountain West Bank	331 N. Leadville Avenue	Ketchum	ID	83340 83340
U.S. Bank, N.A.	111 Main Street	Ketchum	ID ID	83340
		Ketchum	ID	83340
Wells Fargo Bank, N.A.	600 Sun Valley Road 291 Washington Avenue			
Zions First National Bank	e e	Ketchum	ID ID	83340 83341
First Federal Savings Bank of Twin Falls	22349 Kimberly Road	Kimberly	ID	03341
Wells Fargo Bank, N.A.	242 Main Street North	Vimborly	ID	83341
6	1 Main Street	Kimberly		83539
Sterling Savings Bank		Kooskia	ID ID	
Bank of the Cascades	840 E. Avalon Street	Kuna	ID ID	83634
U.S. Bank, N.A.	485 W. Third Street	Kuna	ID ID	83634
Ireland Bank	110 Main Street	Lava Hot	ID	83246
		Springs	ID	02501
AmericanWest Bank	2201 Thain Grade	Lewiston	ID	83501
Banner Bank	1031 21 st Street	Lewiston	ID	83501
Banner Bank	639 Bryden Avenue	Lewiston	ID	83501
Sterling Savings Bank	2250 Thain Grade Road	Lewiston	ID	83501
Sterling Savings Bank	444 Thain Road	Lewiston	ID	83501
Sterling Savings Bank	921 F Street	Lewiston	ID	83501
Syringa Bank	1005 Bryden	Lewiston	ID	83501
Twin River National Bank	1507 G Street	Lewiston	ID	83501
Twin River National Bank	3330 10 th Street	Lewiston	ID	83501
U.S. Bank, N.A.	1900 19 th Avenue	Lewiston	ID	83501
U.S. Bank, N.A.	835 Main Street	Lewiston	ID	83501
Wells Fargo Bank, N.A.	303 Thain Road	Lewiston	ID	83501

	ncial Institutions Operating in Id			
Institution Name	Address	City	State	Zip
Wells Fargo Bank, N.A.	868 Main Street	Lewiston	ID	8350
Zions First National Bank	623 Main Street	Lewiston	ID	8350
Zions First National Bank	500 8 th Avenue	Lewiston	ID	8350
Zions First National Bank	3506 12 th Street	Lewiston	ID	8350
Ireland Bank	208 S. Main Street	Mackay	ID	8325
U.S. Bank, N.A.	202 S. Main Street	Mackay	ID	8325
Ireland Bank	33 Bannock Street	Malad City	ID	8325
U.S. Bank, N.A.	25 E. 50 South	Malad City	ID	8325
U.S. Bank, N.A.	445 Main Street	Marsing	ID	8363
Idaho First Bank	475 E. Deinhard Lane	McCall	ID	8363
Sterling Savings Bank	900 Second Street	McCall	ID	8363
U.S. Bank, N.A.	905 N. Second Street	McCall	ID	8363
Washington Federal Savings & Loan Assoc.	204 E. Park Street	McCall	ID	8363
Bank of the Cascades	30 E. Broadway Avenue	Meridian	ID	8364
Bank of the Cascades	3135 E. Overland Road	Meridian	ID	8364
Bank of the West	1630 S. Wells Avenue	Meridian	ID	8364
Banner Bank	900 E. Fairview Avenue	Meridian	ID	8364
D. L. Evans Bank	2560 E. Fairview Avenue	Meridian	ID	8364
Home Federal Bank	3405 E. Overland Road	Meridian	ID	8364
Home Federal Bank	55 E. Franklin Road	Meridian	ID	8364
daho Banking Company	1875 S. Eagle Road	Meridian	ID	8364
daho Independent Bank	113 E. Idaho Street	Meridian	ID	8364
IP Morgan Chase Bank, N.A.	1850 E. Fairview Avenue	Meridian	ID	8364
Keybank, N.A.	1650 E. Fairview Avenue	Meridian	ID	8364
Keybank, N.A.	3270 Eagle Road	Meridian	ID	8364
Keybank, N.A.	3055 E. Overland Road	Meridian	ID	8364
Mountain West Bank	2970 E. St. Lukes Drive	Meridian	ID	8364
Mountain West Bank	4250 Fairview Avenue East	Meridian	ID	8364
Sterling Savings Bank	1595 S. Eagle Road	Meridian	ID	8364
Syringa Bank	3671 E. Fairview Avenue	Meridian	ID	8364
U.S. Bank, N.A.	20 East Fairview Avenue	Meridian	ID	8364
U.S. Bank, N.A.	220 West Cherry Lane	Meridian	ID	8364
U.S. Bank, N.A.	3301 West Cherry Lane	Meridian	ID	8364
Washington Federal Savings & Loan Assoc.	575 E. Franklin Road	Meridian	ID	8364
Washington Trust Bank	3251 E. Presidential Drive	Meridian	ID	8364
Washington Trust Bank	4037 E. Clocktower Lane, #12	Meridian	ID	8364
Wells Fargo Bank, N.A.	1682 N. Main Street	Meridian	ID	8364
Wells Fargo Bank, N.A.	210 E. Corporate Drive	Meridian	ID	8364
Zions First National Bank	3715 E. Overland Road	Meridian	ID	8364
Syringa Bank	1028 W. Main Street	Middleton	ID	8364
Ireland Bank	420 N. 4 th Street	Montpelier	ID	8325
U.S. Bank, N.A.	672 Washington	Montpelier	ID	8325
Wells Fargo Bank, N.A.	830 Washington Street	Montpelier	ID	8325
Zions First National Bank	902 Washington Street	Montpelier	ID	8325
AmericanWest Bank	600 S. Jackson	Moscow	ID	8384
IP Morgan Chase Bank, N.A.	1790 W. Pullman Road	Moscow	ID ID	8384
Sterling Savings Bank	201 S. Jackson Street	Moscow	ID ID	8384
	609 S. Washington	Moscow	ID ID	8384
Sterling Savings Bank	1314 S. Blaine Street	Moscow	ID ID	8384
U.S. Bank, N.A.				
U.S. Bank, N.A.	301 S. Main Street	Moscow	ID ID	8384
Wells Fargo Bank, N.A.	1313 S. Blaine Street	Moscow	ID ID	8384
Wells Fargo Bank, N.A.	221 S. Main Street	Moscow	ID	8384

Institution Name Address City State Zip						
	105 S. Main Street	,		_		
Zions First National Bank	$400 \text{ N}. 3^{rd} \text{ East}$	Moscow Mountain Hama	ID ID	83843		
Home Federal Bank		Mountain Home	ID ID	83647		
Idaho Independent Bank	310 American Legion Boulevard	Mountain Home	ID ID	83647		
JP Morgan Chase Bank, N.A.	290 N. 2 nd Avenue East	Mountain Home	ID ID	83647		
U.S. Bank, N.A.	305 N. Second East	Mountain Home	ID	83647		
Wells Fargo Bank, N.A.	210 E. Jackson Street	Mountain Home	ID	83647		
Bank of America, N.A.	1460 Caldwell Boulevard	Nampa	ID	83651		
Bank of the Cascades	112 2 nd Street South	Nampa	ID	83651		
Bank of the West	1313 Caldwell Boulevard	Nampa	ID	83651		
D. L. Evans Bank	1536 Caldwell Boulevard	Nampa	ID	83651		
Home Federal Bank	1820 Caldwell Boulevard	Nampa	ID	83651		
Home Federal Bank	500 12 th Avenue South	Nampa	ID	83651		
Idaho Independent Bank	804 12 th Avenue South	Nampa	ID	83651		
JP Morgan Chase Bank, N.A.	50 2 nd Street South	Nampa	ID	83651		
Keybank, N.A.	1020 Caldwell Boulevard	Nampa	ID	83651		
Keybank, N.A.	324 12 th Avenue South	Nampa	ID	83651		
Mountain West Bank	1223 12 th Avenue Road	Nampa	ID	83651		
Mountain West Bank	2024 Caldwell Boulevard	Nampa	ID	83651		
Panhandle State Bank	521 12 th Avenue, South	Nampa	ID	83651		
U.S. Bank, N.A.	1112 1 st Street South	Nampa	ID	83651		
U.S. Bank, N.A.	1515 Caldwell Boulevard	Nampa	ID	83651		
Washington Federal Savings & Loan	223 11 th Avenue South	Nampa	ID	83651		
Assoc.		1				
Washington Trust Bank	2200 N. Cassia Street	Nampa	ID	83651		
Washington Trust Bank	6010 E. Franklin Road	Nampa	ID	83651		
Wells Fargo Bank, N.A.	103 12 th Avenue South	Nampa	ID	83651		
Wells Fargo Bank, N.A.	1401 12 th Avenue South	Nampa	ID	83651		
Wells Fargo Bank, N.A.	2122 W. Karcher Road	Nampa	ID	83651		
Zions First National Bank	2121 W. Karcher Road	Nampa	ID	83651		
Bank of the Cascades	1513 12 th Avenue Road	Nampa	ID	83686		
D. L. Evans Bank	2071 12 th Avenue Road	Nampa	ID	83686		
JP Morgan Chase Bank, N.A.	164 E. Maine Avenue	Nampa	ID	83686		
U.S. Bank, N.A.	2400 12 th Avenue Road	Nampa	ID	83686		
Banner Bank	16292 N. Marketplace Boulevard	Nampa	ID	83687		
Wells Fargo Bank, N.A.	5607 E. Franklin Road	Nampa	ID	83687		
Sterling Savings Bank	308 Virginia Avenue	New Meadows	ID	83654		
Zions First National Bank	130 Plymouth Avenue, North	New Plymouth	ID ID	83655		
U.S. Bank, N.A.	410 Oak Street		ID ID	83543		
AmericanWest Bank	100 Main Street	Nezperce Orofino	ID ID	83543 83544		
		Orofino				
U.S. Bank, N.A.	333 Michigan Avenue		ID ID	83544		
Wells Fargo Bank, N.A.	210 Michigan Avenue	Orofino	ID ID	83544		
Bank of America, N.A.	733 E. Mullen Avenue	Osburn	ID ID	83849		
U.S. Bank, N.A.	Third and Grove Streets	Parma	ID ID	83660		
Wells Fargo Bank, N.A.	202 E. Grove Street	Parma	ID ID	83660		
Keybank, N.A.	108 E. Ellis	Paul	ID	83347		
Bank of America, N.A.	102 S. Main Street	Payette	ID	83661		
Panhandle State Bank	175 N. 16 th Street	Payette	ID	83661		
U.S. Bank, N.A.	101 S. Main Street	Payette	ID	83661		
Wells Fargo Bank, N.A.	2 S. Main Street	Payette	ID	83661		
U.S. Bank, N.A.	1 Country Club Lane	Pinehurst	ID	83850		
Sterling Savings Bank	365 10 th and D Street	Plummer	ID	83851		
Bank of America, N.A.	860 Yellowstone Avenue	Pocatello	ID	83201		
Bank of Idaho	1230 Yellowstone Avenue	Pocatello	ID	83201		
Bank of Idaho	2300 Via Caporatti Drive	Pocatello	ID	83201		

Financial Institutions Operating in Idaho						
Institution Name D. L. Evans Bank	Address 333 Yellowstone Avenue	City Pocatello	State ID	Zip		
D. L. Evans Bank D. L. Evans Bank		Pocatello	ID ID	83201		
	4080 Yellowstone Avenue			83201		
Ireland Bank	486 Yellowstone Avenue	Pocatello	ID ID	83201		
Ireland Bank	2715 Pole Line Road	Pocatello	ID ID	83201		
JP Morgan Chase Bank, N.A.	800 Yellowstone Avenue	Pocatello	ID	83201		
Keybank, N.A.	910 Yellowstone Avenue	Pocatello	ID	83201		
The Bank of Commerce	241 W. Quinn Road	Pocatello	ID	83201		
U.S. Bank, N.A.	855 Yellowstone Avenue	Pocatello	ID	83201		
Wells Fargo Bank, N.A.	751 E. Clark Street	Pocatello	ID	83201		
Wells Fargo Bank, N.A.	950 Yellowstone Avenue	Pocatello	ID	83201		
Zions First National Bank	1590 Yellowstone Avenue	Pocatello	ID	83201		
Citizens Community Bank	2000 Flandro Drive	Pocatello	ID	83202		
Keybank, N.A.	4730 Yellowstone Avenue	Pocatello	ID	83202		
Wells Fargo Bank, N.A.	4195 Yellowstone Avenue	Pocatello	ID	83202		
Citizens Community Bank	280 S. Arthur Avenue	Pocatello	ID	83204		
Keybank, N.A.	105 N. Arthur Street	Pocatello	ID	83204		
U.S. Bank, N.A.	120 N. Arthur Avenue	Pocatello	ID	83204		
Wells Fargo Bank, N.A.	333 S. Main Street	Pocatello	ID	83204		
Zions First National Bank	253 S. Main Street	Pocatello	ID	83204		
Ireland Bank	2715 Poleline Road	Pocatello	ID	83205		
Washington Federal Savings & Loan	1045 Yellowstone Avenue	Pocatello	ID	83206		
Assoc.						
Zions First National Bank	921 S. 8 th Avenue	Pocatello	ID	8320		
Mountain West Bank	476655 Highway 95 North	Ponderay	ID	83852		
Panhandle State Bank	300 Kootenai Cutoff Road	Ponderay	ID	83852		
Bank of America, N.A.	405 E. Seltice Way	Post Falls	ID	83854		
Community 1 st Bank	707 N. Post Street	Post Falls	ID	83854		
Inland Northwest Bank	1729 E. Seltice Way	Post Falls	ID	83854		
JP Morgan Chase Bank, N.A.	3134 E. Mullan Avenue, Suite E	Post Falls	ID	83854		
Mountain West Bank	709 E. Seltice Way	Post Falls	ID	83854		
Panhandle State Bank	3235 E. Mullan Avenue	Post Falls	ID	83854		
U.S. Bank, N.A.	E. 415 Seltice Way	Post Falls	ID	83854		
Washington Trust Bank	1601 E. Seltice Way	Post Falls	ID	83854		
Wells Fargo Bank, N.A.	701 Goude Street	Post Falls	ID ID	83854		
U.S. Bank, N.A.	200 6 th and Pine Street	Potlatch	ID ID	83855		
Ireland Bank	85 E. Oneida		ID ID			
		Preston		83263		
Lewiston State Bank	217 S. State	Preston Preston	ID ID	83263		
U.S. Bank, N.A.	1 S. State		ID ID	83263		
Wells Fargo Bank, N.A.	5 N. State Street	Preston	ID	83263		
Panhandle State Bank	6568 Highway 2	Priest River	ID	83856		
U.S. Bank, N.A.	102 Treat Street	Priest River	ID	83856		
Wells Fargo Bank, N.A.	U.S. Highway #2	Priest River	ID	83856		
Panhandle State Bank	662 Commercial Park Avenue	Rathdrum	ID	83858		
Washington Trust Bank	16102 Highway 41	Rathdrum	ID	83858		
Wells Fargo Bank, N.A.	16234 N. Highway 41	Rathdrum	ID	83858		
Citizens Community Bank	452 N. 2 nd East	Rexburg	ID	83440		
Keybank, N.A.	110 E. Main Street	Rexburg	ID	83440		
The Bank of Commerce	184 E. 2 nd North	Rexburg	ID	83440		
The Bank of Commerce	859 S. Yellowstone Hwy, Suite 2001	Rexburg	ID	83440		
U.S. Bank, N.A.	77 E. Main	Rexburg	ID	83440		
Washington Federal Savings & Loan	80 N. 2 nd East	Rexburg	ID	83440		
Assoc.						
Wells Fargo Bank, N.A.	39 E. Main Street	Rexburg	ID	83440		
Zions First National Bank	149 W. Main Street	Rexburg	ID	83440		
		U				

Financial Institutions Operating in Idaho ⁺					
Institution Name	Address	City	State	Zip	
The Bank of Commerce	463 Rigby Lake Drive	Rigby	ID	83442	
U.S. Bank, N.A.	183 S. State	Rigby	ID	83442	
Wells Fargo Bank, N.A.	127 N. State Street	Rigby	ID	83442	
Zions First National Bank	219 E. Main Street	Rigby	ID	83442	
Sterling Savings Bank	402 S. Main Street	Riggins	ID	83549	
The Bank of Commerce	386 Main Street	Ririe	ID	83443	
D. L. Evans Bank	418 S. Oneida Street	Rupert	ID	83350	
First Federal Savings Bank of Twin	701 Seventh Street	Rupert	ID	83350	
Falls					
U.S. Bank, N.A.	612 Fifth Street	Rupert	ID	83350	
Wells Fargo Bank, N.A.	602 E. Street	Rupert	ID	83350	
Bank of America, N.A.	603 Shoup Street	Salmon	ID	83467	
U.S. Bank, N.A.	501 Main Street	Salmon	ID	83467	
Wells Fargo Bank, N.A.	116 N. Andrews Street	Salmon	ID	83467	
AmericanWest Bank	605 5 th Avenue	Sandpoint	ID	83864	
Bank of America, N.A.	405 N. Second Avenue	Sandpoint	ID	83864	
Mountain West Bank	1319 Highway 2	Sandpoint	ID	83864	
Panhandle State Bank	231 N. Third Avenue	Sandpoint	ID	83864	
Panhandle State Bank	414 Church Street	Sandpoint	ID	83864	
U.S. Bank, N.A.	201 Main Street	Sandpoint	ID	83864	
Washington Trust Bank	515 Pine Street, Suite D	Sandpoint	ID	83864	
Wells Fargo Bank, N.A.	320 N. Fourth Avenue	Sandpoint	ID	83864	
The Bank of Commerce	270 S. Emerson Avenue	Shelley	ID	83274	
U.S. Bank, N.A.	201 W. Pine Street	Shelley	ID	83274	
Wells Fargo Bank, N.A.	103 S. Birch Street	Shoshone	ID	83352	
Ireland Bank	98 W. 2 nd South	Soda Springs	ID	83276	
U.S. Bank, N.A.	189 S. Main	Soda Springs	ID	83276	
Inland Northwest Bank	31845 N. 5 th Avenue	Spirit Lake	ID	83869	
Bank of Idaho	135 N. Bridge Street	St. Anthony	ID	83445	
Keybank, N.A.	30 W. Main	St. Anthony	ID	83445	
Wells Fargo Bank, N.A.	40 S. Bridge Street	St. Anthony	ID	83445	
AmericanWest Bank	1500 Main	St. Maries	ID	83861	
U.S. Bank, N.A.	138 N. Eighth Street	St. Maries	ID	83861	
Wells Fargo Bank, N.A.	729 Main Avenue	St. Maries	ID	83861	
Idaho Independent Bank	90 S. Star Road	Star	ID	83669	
Wells Fargo Bank, N.A.	Boardwalk Mall	Sun Valley	ID	83353	
The Bank of Commerce	1098 E. 1500 North	Terreton	ID	83450	
Sterling Savings Bank	424 S. Main Street	Troy	ID	83871	
Bank of America, N.A.	1040 Shoshone Drive	Twin Falls	ID	83301	
Banner Bank	1340 Blue Lakes Boulevard, North	Twin Falls	ID	83301	
D. L. Evans Bank	215 Blue Lakes Boulevard, North	Twin Falls	ID ID	83301	
D. L. Evans Bank	213 Due Eakes Boulevard, North 222 Main Avenue, South	Twin Falls	ID	83301	
D. L. Evans Bank	906 Blue Lakes Boulevard, North	Twin Falls	ID ID	83301	
First Federal Savings Bank of Twin		Twin Falls	ID ID	83301	
•	110 Falls Avenue	I will Falls	ID	85501	
Falls First Federal Servings Death of Twin	149 Eastland Drive	Turin Falls	ID	02201	
First Federal Savings Bank of Twin	148 Eastland Drive	Twin Falls	ID	83301	
Falls	202 Gl 1 G(N	T '. D.11.	ID	02201	
First Federal Savings Bank of Twin	383 Shoshone Street North	Twin Falls	ID	83301	
Falls		т : г 11	ID	02201	
First Federal Savings Bank of Twin	886 Blue Lakes Boulevard, North	Twin Falls	ID	83301	
Falls		т · г и	ID	02201	
JP Morgan Chase Bank, N.A.	705 Blue Lakes Boulevard, North,	Twin Falls	ID	83301	
IZ L. I. N. A	Suite G	T ' F 11	ID	02201	
Keybank, N.A.	103 Main Avenue, East	Twin Falls	ID	83301	

	inclui institutions operating in Idar		<u> </u>	
Institution Name	Address	City	State	Zip
Panhandle State Bank	113 Main Avenue West	Twin Falls	ID	83301
Panhandle State Bank	1715 Poleline Road, East	Twin Falls	ID	83301
The Farmers National Bank of Buhl	1097 Blue Lakes Boulevard, North	Twin Falls	ID	83301
The Farmers National Bank of Buhl	341 Pole Line Road	Twin Falls	ID	83301
U.S. Bank, N.A.	241 Shoshone Street North	Twin Falls	ID	83301
U.S. Bank, N.A.	748 Blue Lakes Boulevard North	Twin Falls	ID	83301
Washington Federal Savings & Loan	494 Blue Lake Boulevard, North	Twin Falls	ID	83301
Assoc.				
Wells Fargo Bank, N.A.	102 Main Avenue South	Twin Falls	ID	83301
Wells Fargo Bank, N.A.	1303 Addison Avenue East	Twin Falls	ID	83301
Wells Fargo Bank, N.A.	1329 Filer Avenue East	Twin Falls	ID	83301
Wells Fargo Bank, N.A.	1864 Blue Lakes Boulevard North	Twin Falls	ID	83301
Zions First National Bank	1863 Blue Lakes Boulevard, North	Twin Falls	ID	83301
Zions First National Bank	1913 Addison Avenue	Twin Falls	ID	83301
The Farmers National Bank of Buhl	890 Shoshone Street	Twin Falls	ID	83303
Keybank, N.A.	1665 Blue Lakes Boulevard North	Twin Falls	ID	83303
U.S. Bank, N.A.	138 N. Main Street	Victor	ID	83455
AmericanWest Bank	806 Bank Street	Wallace	ID	83873
U.S. Bank, N.A.	528 Cedar Street	Wallace	ID	83873
Bank of the West	34 E. Main Street	Weiser	ID	83672
Panhandle State Bank	440 E. Main Street	Weiser	ID	83672
Wells Fargo Bank, N.A.	407 State Street	Weiser	ID	83672
Zions First National Bank	606 State Street	Weiser	ID	83672
The Farmers National Bank of Buhl	Main and Idaho Streets	Wendell	ID	83355
U.S. Bank, N.A.	15 S. Idaho Street	Wendell	ID	83355
Zions First National Bank	315 Avenue A	Wilder	ID	83676

EXHIBIT IV

STATE OF IDAHO

STATE-CHARTERED CREDIT UNIONS COMPARATIVE STATEMENT Close of Business 12/31/10 and 12/31/09

			%
	2010	2009	Change
ASSETS			
Cash and Cash Equivalents	178,227,695	184,601,894	-3.45%
Unsecured Credit Cards	71,546,189	55,075,682	29.91%
All Other Unsecured Loans	33,022,201	32,717,505	0.93%
New Auto Loans	252,333,298	279,562,731	-9.74%
Used Auto Loans	541,110,829	486,986,414	11.11%
First Mortgage Real Estate Loans	523,583,386	501,705,395	4.36%
Other Real Estate Loans	134,421,906	136,372,558	-1.43%
Other Loans and Leases	131,769,027	132,803,078	-0.78%
Total Loans	\$1,687,786,836	\$1,625,223,363	3.85%
Allowance for Loan and Lease Losses	-13,482,866	-9,863,168	36.70%
Loans Held For Sale	5,416,151	5,772,134	-6.17%
Loans Including Loans For Sale Less ALLL	1,679,720,121	1,621,132,329	3.61%
Available for Sale Securities	64,853,650	39,930,250	62.42%
Held-to Maturity	22,358,120	23,484,697	-4.80%
Deposits in Commercial Banks, Savings & Loans, Savings Banks	87,688,903	67,109,425	30.67%
Loans to, Deposits in, and Investments in Natural Person Credit Unions	4,146,505	2,331,375	77.86%
Membership Capital and Paid-in Capital at Corporate Credit Unions	469,313	1,487,527	-68.45%
All Other Investments in Corporate Credit Unions	92,690,366	217,847,366	-57.45%
All Other Investments	7,131,014	2,637,145	170.41%
Total Investments	\$279,337,871	\$354,827,785	-21.28%
Land and Building (Net of Dep)	77,049,417	73,009,319	5.53%
Other Fixed Assets	9,532,962	10,625,444	-10.28%
Shares Insurance Capitalization Deposit	17,916,850	16,265,140	10.15%
Other Assets	17,990,598	15,494,663	16.11%
	1,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	10,19 1,000	10111/0
Total Other Assets	122,965,119.00	115,394,566.00	6.56%
TOTAL ASSETS	\$2,260,250,806	\$2,275,956,574	-0.69%
LIABILITIES, SHARES AND EQUITY			
Promissory and other Notes Payable	0	103,195,746	-100.00%
Dividends / Interest Payable	2,909,472	4,602,304	-36.78%
Accounts Payable & Liabilities	20,165,877	20,218,919	-0.26%
Total Liabilities	\$23,075,349	\$128,016,969	-81.97%
Share Drafts	275,369,237	260,302,334	5.79%
Regular Shares	446,970,055	401,841,213	11.23%
All Other Shares and Deposits	1,313,877,659	1,302,520,663	0.87%
Total Shares And Deposits	\$2,036,216,951	\$1,964,664,210	3.64%
Undivided Earnings	140,298,705	127,411,964	10.11%
Regular Reserves	65,369,909	61,748,519	5.86%
Other Reserves	269,367	269,367	0.00%
Unrealized Gain/Loss A-F-S SEC	-146,350	-46,290	216.16%
Other Comprehensive Income	-4,833,125	-6,108,165	-20.87%
Total Equity	\$200,958,506	\$183,275,395	-20.87% 9.65%
TOTAL LIABILITIES AND EQUITY	\$2,260,250,806	\$2,275,956,574	-0.69%
TOTAL LIADILITIES AND EQUIT I	φ2,200,230,600	φ2,213,930,374	-0.09%

STATE OF IDAHO STATE-CHARTERED CREDIT UNIONS TOTAL ASSETS

Name	City	State	12/31/2010	12/31/2009	% Change
Idaho State-Chartered Credit Unions					
A+ Credit Union	Idaho Falls	ID	17,545,413	16,020,731	9.52%
Boise Fire Department Credit Union	Boise	ID	7,567,400	6,515,646	16.14%
Boise Valley Credit Union	Boise	ID	1,028,451	1,078,134	-4.61%
Cassia County Education Association Credit Union	Burley	ID	2,970,017	2,837,668	4.66%
Clearwater Credit Union	Lewiston	ID	22,494,780	23,116,953	-2.69%
Cornerstone Credit Union	Caldwell	ID	19,880,736	23,421,650	-15.12%
E.S.A. Credit Union	Boise	ID	4,885,079	5,119,922	-4.59%
East Idaho Credit Union	Idaho Falls	ID	237,695,149	227,463,018	4.50%
Health Care Idaho Credit Union	Boise	ID	9,070,959	8,757,210	3.58%
Idadiv Credit Union	Nampa	ID	44,554,267	47,630,143	-6.46%
ICON Credit Union (previously known as Idahy)	Boise	ID	137,047,489	135,304,912	1.29%
Idaho Advantage Credit Union	Boise	ID	52,625,384	52,864,180	-0.45%
Idaho Central Credit Union	Pocatello	ID	865,899,955	919,641,924	-5.84%
Idaho United Credit Union	Boise	ID	25,800,169	22,748,205	13.42%
Jefferson County Public Employees Credit Union	Menan	ID	399,894	404,184	-1.06%
Kamiah Community Credit Union	Kamiah	ID	40,584,131	40,713,628	-0.32%
Lewis Clark Credit Union	Lewiston	ID	49,105,112	39,108,253	25.56%
Lewiston Catholic Credit Union	Lewiston	ID	352,758	355,643	-0.81%
M.A.P. Credit Union	Burley	ID ID	1,945,779	1,937,719	-0.81%
Members Preferred Credit Union	Idaho Falls	ID ID	25,770,692	27,502,070	-6.30%
			577,544	27,502,070 564,047	-0.30%
Mini-Cassia Employees Credit Union	Burley	ID ID	,	,	
Mountain Gem Credit Union	Nampa	ID ID	13,734,140	13,868,384	-0.97%
Northwest Christian Credit Union	Nampa	ID ID	33,367,246	30,174,706	10.58%
Payette River Credit Union	Emmett	ID	6,723,017	6,598,069	1.89%
Pine Tree Credit Union	Grangeville	ID	29,166,341	27,120,106	7.55%
Pocatello Simplot Credit Union	Pocatello	ID	33,408,262	32,624,083	2.40%
Potelco United Credit Union (Includes merged ICE)	Pocatello	ID	62,460,166	57,472,924	8.68%
Public Employees	Coeur d'Alene	ID	8,270,219	8,608,232	-3.93%
Shell-Fir Credit Union	Shelley	ID	963,993	970,675	-0.69%
Shoshone County School Employees Credit Union	Wardner	ID	888,041	880,374	0.87%
SIMCOE Credit Union	Burley	ID	5,654,142	5,456,942	3.61%
Simplot Employees Credit Union	Caldwell	ID	18,494,473	18,985,468	-2.59%
St. Alphonsus Medical Credit Union	Boise	ID	6,319,599	6,276,914	0.68%
St. Joe Valley Credit Union	St. Maries	ID	7,222,870	7,192,639	0.42%
Times- News Employees Credit Union	Twin Falls	ID	213,986	212,922	0.50%
Tribune Credit Union	Lewiston	ID	717,963	742,586	-3.32%
Valley Community Credit Union	Nampa	ID	8,458,149	8,679,075	-2.55%
Westmark Credit Union	Idaho Falls	ID	447,348,629	439,067,154	1.89%
White Pine Credit Union	Pierce	ID	9,038,412	7,919,481	14.13%
Total Idaho State-Chartered Credit Unions			2,260,250,806	2,275,956,574	-0.69%
Other State-Chartered Credit Unions Operating in I				10	
Global Credit Union	Spokane	WA	37,284,200	40,587,770	-8.14%
Horizon Credit Union	Spokane	WA	82,475,692	86,166,495	-4.28%
Numerica Credit Union	Spokane	WA	63,318,190	67,539,129	-6.25%
Spokane Teachers Credit Union	Spokane	WA	52,297,049	41,246,287	26.79%
Silverado Credit Union	Angwin	CA	1,264,747	1,076,263	17.51%
Total Other State-Chartered Credit Unions			236,639,878	236,615,944	0.01%
Total State-Chartered Credit Unions (Idaho Assets)			2,496,890,684	2,512,572,518	-0.62%
Total State-Charteleu Cicult Unions (Iuano Assets)		_	2,490,090,004	2,512,572,518	-0.02%

EXHIBIT V

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

July 6, 2010 August 4, 2010 December 12, 2010

BROCK BRUEGEMAN; BRANDON JOHNSON, Idaho Falls, ID; BRIAN BIRCH, Rigby, ID; SONNY JENSEN; UT - On July 6, 2010, the Department filed a civil lawsuit in Bonneville County District Court alleging the defendants sold unregistered promissory notes and investment contracts to Idaho investors in the amount of The Department also alleged that the defendants \$2.1 million. misrepresented and omitted material facts about the investments. On August 4, 2010, Mr. Birch consented to the entry of a judgment and permanent injunction against him. On December 12, 2010, Mr. Bruegeman consented to the entry of a judgment and permanent injunction against him. Also on December 12, 2010, the Court entered a default Judgment and Permanent Injunction against Mr. Jensen. Each defendant was ordered to pay partial restitution to injured investors and was permanently enjoined from selling investment securities in Idaho.

August 16, 2010 October 22, 2010 January 7, 2011

GERALD SILENCE; SHAUNA SILENCE; WISE LENDING, LLC; WISE ENTERPRISES, LLC, Middleton and Boise, ID – The Department filed a civil lawsuit against Gerald silence and his companies, Wise Lending LLC and Wise Enterprises, LLC, on August 16, 2010. Shauna Silence was also named in the complaint, but solely as a relief defendant for receipt of alleged ill-gotten gains. The complaint alleged registration and anti-fraud violations of the Idaho Uniform Securities Act. Specifically, the complaint alleged that the defendants raised \$2.3 million from at least 16 Idaho investors claiming investor funds would be used to funds bridge loans and other short-term loans, and that the loans would be secured. Defendants offered annual rates of return between 12 and 15 percent. Instead, defendants used some investor funds repay other investors and to pay his own personal expenses.

On October 22, 2010, the Court entered a default judgment against Wise Lending and Wise Enterprises after neither appeared to defend the lawsuit. On January 7, 2011, a stipulated judgment and permanent

injunction was entered against Gerald Silence in which Silence consented to imposition of a judgment and permanent injunction, as well as to a money judgment for restitution to investors of \$2,276,636.79.

July 23, 2010 December 17, 2010

DEREK F.C. ELLIOTT; SUN VILLAGE JUAN DOLIO ASSOCIATES, INC., Dominican **Republic;** JAMES В. CATLEDGE: **BRIMLEY;** DAVID BARBARA NAGEL; IMPACT, INC.; IMPACT NET WORTH, LLC, Henderson, NV; STEVE CABEZUD, Santa Rosa, CA; JOHN THOMPSON, Orem, UT; TREVOR WALKER, Idaho Falls, ID - A civil securities lawsuit was filed against these defendants in February of 2009 alleging that they sold, or materially aided in the offer or sale of investment contract securities in violation of the registration and antifraud provisions of the Idaho Uniform Securities Act.

The Department's complaint alleges that the defendants offered and sold over \$3 million in various types of unregistered Dominican Republic resort-related securities to Idaho investors. More specifically, various defendants are alleged to have a) misrepresented that the investments were safe, b) misrepresented that investors would receive a fee simple deeded title to their portion of the resort property, c) misrepresented the terms of an allegedly fixed-term income investment that was actually a 45 year resort time-share interest, and d) violated the mortgage loan originator licensing provisions of the Idaho Residential Mortgage Practices Act (IRMPA).

On July 23, 2010, default judgments and permanent injunctions were entered against Derek F.C. Elliott and Sun Village Juan Dolio Associates. The court also ordered restitution of \$2,598,880.65 as well as civil penalties and attorney fees.

On November 12, 2010, the Department was granted partial summary judgment against James Catledge, Impact, Inc. and Impact Net Worth, LLC, requiring these defendants to comply with a consent order previously reached with the Department. On December 17, 2010, the court order more than \$2 million in rescission for the benefit of investors and prejudgment interest of more than \$400,000.

December 3, 2010 JERRY FRANCIS WARD individually and dba MED-LIFE, filed in Ada County, ID – The Department's original complaint was filed in February 2010, and alleged that the defendant violated the registration and anti-fraud provisions of the Idaho Uniform Securities Act. Defendant is alleged to have offered investors higher-than-market returns on purported "insured certificates of deposit" that were neither FDIC insured nor issued by a financial institution, as well as by promoting a fictitious development of a senior housing facility in northern Idaho. In June, 2009, the Department had ordered Ward to Cease and Desist these fund-raising efforts, but the Department alleges Ward continued to raise money.

A default judgment and permanent injunction was entered against Ward on December 3, 2010.

February 7, 2010 DEREK F.C. ELLIOTT; SUN VILLAGE JUAN DOLIO ASSOCIATES, INC., Dominican **Republic;** JAMES **B**. CATLEDGE; DAVID **BRIMLEY;** BARBARA NAGEL; IMPACT, INC.; IMPACT NET WORTH, LLC, Henderson, NV; STEVE CABEZUD, Santa Rosa, CA; JOHN THOMPSON, Orem, UT; TREVOR WALKER, Idaho Falls, ID - A civil securities lawsuit was filed against these defendants in February of 2009 alleging that they sold, or materially aided in the offer or sale of investment contract securities in violation of the registration and antifraud provisions of the Idaho Uniform Securities Act.

> The Department's complaint alleges that the defendants offered and sold over \$3 million in various types of unregistered Dominican Republic resort-related securities to Idaho investors. More specifically, various defendants are alleged to have a) misrepresented that the investments were safe, b) misrepresented that investors would receive a fee simple deeded title to their portion of the resort property, c) misrepresented the terms of an allegedly fixed-term income investment that was actually a 45 year resort time-share interest, and d) violated the mortgage loan originator licensing provisions of the Idaho Residential Mortgage Practices Act (IRMPA).

> During this fiscal year, the Department obtained a default judgment against defendant David Brimley who was alleged to have solicited and accepted mortgage application forms in Idaho while unlicensed. The Court found Brimley to have violated the IRMPA and entered a default judgment and permanent injunction prohibiting future violations of the IRMPA. The Department was awarded \$25,000 in civil penalties and \$1,000 in attorney fees. The case continues against the remaining defendants.

February 28, 2011 **KEITH EUGENE MITCHELL, Coeur d'Alene, ID** – The Department filed a civil securities lawsuit against Mr. Mitchell alleging that he violated the registration and anti-fraud provisions of Idaho Uniform Securities Act. Mitchell is alleged to have solicited investors to invest in commodity futures options beginning in 2007. Mitchell claimed his investment system would provide investor returns of between 36 and 60 percent and any losses would be limited to 5 percent of their principal investment. Among the anti-fraud violations alleged is that Mitchell failed to tell investors that in 2003, the Department had ordered him to cease and desist from securities violations and to pay a \$25,000.

January 20, 2011 March 4, 2011

DUANE LEE YOST, Idaho Falls, ID – The Department filed a civil securities lawsuit against Mr. Yost alleging that he violated the registration and anti-fraud provisions of Idaho Uniform Securities Act. Yost is alleged to have solicited investors to invest in a trading program operated by Trigon Group, Inc., a company owned by Daren Palmer. Investors invested at least \$27,270,784 in promissory notes and investment contracts which Yost forwarded on to Trigon. The program operated by Palmer turned out to be a Ponzi scheme. Yost is alleged to have defrauded investors by misrepresenting the investment and by omitting material information from the investor solicitations. Yost also failed to register the securities and failed to register as a securities broker-dealer or agent.

On March 4, 2011, a default judgment was entered against Yost. The court ordered that Yost pay \$27,270,784 in restitution, found he had violated the Uniform Securities Act and permanently enjoined him from future violations of the securities laws.

April 11, 2011 GERALD R. THOMPSON, individually and dba SKY DETECTIVE, INC., Boise, ID – The Department filed a civil securities lawsuit against Mr. Thompson alleging that he violated the registration and anti-fraud provisions of Idaho Uniform Securities Act. The complaint alleges that Thompson created Sky Detective for the purpose of developing and marketing a tracking and surveillance device for law enforcement. The case is ongoing.

April 11, 2011 **DAREN L. PALMER, individually and dba TRIGON GROUP, INC., Idaho Falls, ID** - The Department filed a civil securities lawsuit against Mr. Palmer alleging that he violated the registration and antifraud provisions of Idaho Uniform Securities Act. Palmer is alleged to have solicited investors to invest in a trading program operated by Trigon Group, Inc., a company owned by Daren Palmer. Investors invested more than \$61,000,000 in promissory notes and investment contracts with Palmer and Trigon. The program operated by Palmer turned out to be a Ponzi scheme. Palmer is alleged to have defrauded investors by misrepresenting the investment and by omitting material information from the investor solicitations. Palmer also failed to register the securities and failed to register as a securities broker-dealer or agent.

On June 2, 2011, a default judgment was entered against Palmer. The court ordered that Palmer pay \$29,226,399.79 in restitution, \$40,000 in

penalties found he had violated the Uniform Securities Act and permanently enjoined him from future violations of the securities laws.

In a separate criminal action brought by the Office of the U.S. Attorney for Idaho, Palmer was sentenced in May 2011, to 8 years in prison and ordered to pay restitution of \$29,842,731 to the victims of his scheme.

May 27, 2011 LOUIS C. NARDONE, III, individually and dba Precision Marketing Group, Lake Mohegan, NY - The Department filed a civil securities lawsuit against Mr. Nardone alleging that he violated the registration and anti-fraud provisions of Idaho Uniform Securities Act. The complaint alleges that Nardone raised Approximately \$300,000 from nearly two dozen Idahoans and promised rates of return of 115 – 175 percent annually. The complaint alleges Nardone failed to disclose that he would use some of the investment funds for his personal expenses as well as to pay returns to earlier investors. The case is ongoing.

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

January 4, 2010 <u>W.M "Bill" McIntosh, Yellow Piine, ID</u> – Consent Order to Cease and Desist – Respondent McIntosh, an Idaho licensed insurance agent, became associated with ABC Viaticals, Inc. as a sales and service agent. Between the summer of 2004 and November 2006, McIntosh sold approximately \$300,000 in ABC securities to Idaho residents. In connection with the offer and sale of these securities, McIntosh and ABC made material misrepresentations of material information and omitted to disclose material information to Idaho residents and others.

In resolution of the matter, McIntosh a) admitted the violations, b) waived any securities-related statute of limitations defenses for two years in the event a private investor suit is brought against him and c) agreed to restriction of his future securities activities.

In a related federal criminal prosecution, ABC's principals, C. Keith LaMonda and Jess W. LaMonda, Jr., were found guilty of mail and wire fraud for their actions in operating the fraudulent investment scheme through ABC. Each received a lengthy prison sentence and were ordered to Pay \$88 million in restitution to ABC victims. A receiver was appointed to manage the affairs of ABC with a view to protecting the remaining assets of those defrauded by ABC.

April 15, 2011 HARRISON INVESTMENTS, LLC; DENSMORE FINANCIAL GROUP; ALLAN DENSMORE, Nampa, ID – Agreement and Order – Respondents admitted to violations of the Uniform Securities Act (2004) when they offered and/or sold investment interests in Harrison Investments, LLC. Specifically, Respondents admitted offering and/or selling unregistered securities, Densmore and Harrison admitted providing an inaccurate balance sheet to investors, and Densmore admitted making verbal representations to investors that were contrary to the information provided in the offering documents.

> Among the remedies agreed to by Respondents were that they would correct the inaccurate information and not issue any securities or engage in issuer activities for a period of five years.

April 15, 2011 **DENSMORE FINANCIAL GROUP; ALLAN DENSMORE, Nampa, ID** – Agreement and Order – The Respondents acknowledged that a factual basis existed from which a reasonable trier of fact could conclude that Respondents failed to comply with the Uniform Securities Act (2004) and the rules promulgated thereunder. Specifically, the Department alleged that Respondents failed to file certain items of sales literature with their affiliated broker-dealer or investment advisory firm or with the Department; Respondents failed to keep true and complete books and records; and, Respondents used testimonials and other prohibited information in their advertising.

Respondents agreed to pay a fine of \$10,000 and agreed to restrictions on their future investment advisory activities.

June 21, 2011 **DOUGLAS PAUL HOLM, Roberts, ID** – Agreement and Order – The Order alleged the Respondent failed to disclose on his CRD record that his Resident Producer License had been revoked by the Idaho Department of Insurance in July 2010. The basis for the revocation was that Holm had knowingly provided false information in order to have two insurance policies issued. Respondent admitted to the violations alleged, agreed to revocation of his broker-dealer agent registration in Idaho and agreed to comply with the Uniform Securities Act (2004) in the future.

EXHIBIT VI

CONSUMER FINANCE BUREAU SANCTIONS REPORT

I. ORDERS ISSUED UNDER THE IDAHO CREDIT CODE

September 9, 2010 MONEY TRAIN TITLE LOANS, LLC (Midvale, Utah) – On September 9, 2010, the Idaho Department of Finance and Money Train Title Loans, LLC (Money Train) entered into a consent order addressing this Utah company's acts of operating a title lending business in Idaho without the license required by the Idaho Credit Code and Idaho's Title Loan Act. Under the terms of the consent order, Money Train admitted to the allegations contained in the consent order, to include extending at least forty-three (43) title loans in Idaho without a license and paid to the Department an administrative penalty of \$10,000 and attorney fees and investigative costs in the amount of \$1,000. In addition, Money Train agreed that, pursuant to Idaho Code § 28-46-503(2), all title loans extended in Idaho while it was not licensed were void; that it would not attempt to collect on such loans; that it would forfeit the loan amounts extended; and that any moneys collected in connection with such loans would be returned to borrowers, to include any certificate of title Money Train held as a result of such loans. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

Money Train applied for and was granted an Idaho regulated lender license.

December 16, 2010 FLOBRIDGE GROUP, LLC, dba FLOWBRIDGE.COM AND MAINSTREETLOANSONLINE.COM (Springville, Utah) – On December 16, 2010, the Director of the Idaho Department of Finance issued an Order to Cease and Desist against FloBridge Group, LLC, dba Flowbridge.com and Mainstreetloansonline.com (FloBridge), a Utah payday lender. The Order alleges that FloBridge engaged in unlicensed payday lending activities in Idaho in violation of the Idaho Credit Code and Idaho's Payday Lending Act. The Order also alleges that FloBridge, after extending payday loans to two Idaho residents, served wage garnishments on each of the resident's respective employers which represented that FloBridge was authorized by federal law to garnish a debtor's wages without complying with Idaho collection statutes. Idaho collection statutes provide that wage garnishments are allowed only with a state court's authority and provide an avenue for a debtor to challenge the wage garnishment. The Order requires FloBridge and its agents or employees to immediately cease and desist from engaging in payday lending activities without the license required by the Idaho Credit Code and Idaho's Payday Lending Act. The Order further requires FloBridge and its agents or employees to immediately cease and desist from engaging in fraudulent or unconscionable acts in connection with payday lending activities in Idaho,

to include garnishing or attempting to garnish a debtor's wages in violation of the Idaho Credit Code and Idaho's Payday Lending Act.

May 24, 2011 **GOODWILL FINANCE, LLC** (Boise, Idaho) – On May 24, 2011, the Idaho Department of Finance and Goodwill Finance, LLC entered into a consent order addressing this Idaho company's acts of operating a regulated lending business in Idaho without the license required by the Idaho Credit Code. Under the terms of the consent order, the company admitted to the allegations contained in the consent order, to include extending numerous regulated loans to Idaho residents between June 2008 and February 1, 2011 without a license; and paid to the Department attorney fees and investigative costs in the amount of \$5,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

Goodwill Finance, LLC applied for and was granted an Idaho regulated lender license.

II. ORDERS ISSUED UNDER THE IDAHO COLLECTION AGENCY ACT

July 8, 2010 **FEDERAL RECOVERY ACCEPTANCE, INC., dba PARAMOUNT ACCEPTANCE** (Holladay, Utah) – On July 8, 2010, the Idaho Department of Finance and Federal Recovery Acceptance, Inc., dba Paramount Acceptance, entered into a consent order addressing this Utah company's acts of operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act (the Act). Under the terms of the consent order, the company admitted to the allegations contained in the consent order; agreed to submit to the Department a complete license application, or otherwise cease and desist from all activities in Idaho that would require licensure under the Act; and agreed to pay to the Department an administrative penalty of \$50,000 and attorney fees and investigative costs in the amount of \$5,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company applied for and was issued a collection agency license by the Department.

September 9, 2010 **ARMADA CORP.** (Wenatchee, Washington) – On September 9, 2010, the Idaho Department of Finance and Armada Corp. entered into a consent order addressing this Washington company's acts of operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act (the Act). Under the terms of the consent order, the company admitted to the allegations contained in the consent order, to include collecting against Idaho residents without a license; agreed to cease

and desist from all collection activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$15,000 and attorney fees and investigative costs in the amount of \$1,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company applied for and was granted an Idaho collection agency license.

September 21, 2010 **VISION FINANCIAL CORP.** (White Plains, New York) – On September 21, 2010, the Idaho Department of Finance and Vision Financial Corp. entered into a consent order addressing this New York company's acts of operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act (the Act). Under the terms of the consent order, the company admitted to the allegations contained in the consent order, to include collecting against Idaho residents without a license; agreed to cease and desist from all collection activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$15,000 and attorney fees and investigative costs in the amount of \$1,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company applied for and was granted an Idaho collection agency license.

September 28, 2010 **PROFESSIONAL RECOVERY CONSULTANTS, INC.** (Durham, North Carolina) – On September 28, 2010, the Idaho Department of Finance and Professional Recovery Consultants, Inc. entered into a consent order addressing this North Carolina company's acts of operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act (the Act). Under the terms of the consent order, the company admitted to the allegations contained in the consent order, to include collecting against Idaho residents without a license; agreed to cease and desist from all collection activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$9,000 and attorney fees and investigative costs in the amount of \$1,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company applied for and was granted an Idaho collection agency license.

October 13, 2010 CHRISTIAN DEBT CONSOLIDATION, INC. (Boca Raton, Florida) – On October 13, 2010, the Idaho Department of Finance and Christian Debt Consolidation, Inc. entered into a consent order addressing the company's acts of contracting with Idaho consumers to provide debt and credit counseling services without the license required under the Idaho Collection Agency Act (the Act). The consent order further addressed the company's acts of charging excessive fees to Idaho consumers for its debt and credit counseling services. Under the terms of the consent order, the company admitted to the allegations contained in the consent order; and agreed to pay to the Department an administrative penalty of \$15,000 and attorney fees and investigative costs in the amount of \$1,000. The company also agreed to refund to each Idaho client, whether such client's account was open or closed, all fees charged to such client for the company's services and all moneys being held in trust for such Idaho client that had not been applied to compromise that client's debt, in the total amount of \$88,735.09. The company further agreed to not engage in any activity in Idaho which requires a debt and credit counselor license; to close all Idaho accounts; to exclude the state of Idaho from all advertising and promotion of its debt or credit counseling services until it obtains the appropriate Idaho license to engage in such activities; and to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

October 26, 2010 **AUTOMATED COLLECTION** SYSTEMS, INC., dba **RECEIVABLES MANAGEMENT, INC.** (Southfield, Michigan) – On October 26, 2010, the Idaho Department of Finance and Automated Collections Systems, Inc., dba Receivables Management, Inc. entered into a consent order addressing this Michigan company's acts of operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act (the Act). Under the terms of the consent order, the company admitted to the allegations contained in the consent order, to include making collection contacts directed to Idaho residents while the company failed to hold a collection agency license; agreed to cease and desist from all collection activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$10,000 and attorney fees and investigative costs in the amount of \$1,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company applied for and was granted an Idaho collection agency license.

November 18, 2010 **MAGIC VALLEY CREDIT REPAIR, LLC** (Twin Falls, Idaho) – On November 18, 2010, the Idaho Department of Finance and Magic Valley Credit Repair, LLC entered into a consent order addressing this Idaho limited liability company's acts of operating a credit repair business in Idaho without the license required by the Idaho Collection Agency Act (the Act). The company collected approximately \$1,175 in fees from Idaho residents prior to the performance of the services to be performed. Under the terms of the consent order, the company admitted to operating a credit repair business in Idaho while unlicensed to do so; agreed to refund to all Idaho residents the fees collected for its credit repair services; agreed to cease and desist from all credit repair activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$1,000 and attorney fees and investigative costs in the amount of \$500. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

Magic Valley Credit Repair, LLC applied for and was granted an Idaho credit repair license.

December 16, 2010 **CRESTWOOD MGMT LLC** (Beachwood, Ohio) – On December 16, 2010, the Idaho Department of Finance and Crestwood Mgmt LLC entered into a consent order addressing this Delaware limited liability company's acts of operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act (the Act). Under the terms of the consent order, the company admitted to the allegations contained in the consent order, to include engaging in collection activities in Idaho between March 16, 2010 through at least July 5, 2010 without a license; agreed to cease and desist from all collection activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$10,000 and attorney fees and investigative costs in the amount of \$1,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company applied for and was granted an Idaho collection agency license.

December 20, 2010 GHS SOLUTIONS, LLC (Delray Beach, Florida) – On December 20, 2010, the Idaho Department of Finance and GHS Solutions, LLC entered into a consent order addressing this Florida limited liability company's acts of contracting with Idaho consumers to provide debt settlement services without the license required under the Idaho Collection Agency Act (the Act). Under the terms of the consent order, the company admitted to the allegations contained in the consent order; and agreed to pay to the Department an administrative penalty of \$10,000 and attorney fees and investigative costs in the amount of \$5,000. The company also agreed to refund to each Idaho client all fees charged to such client for the company's services and all moneys being held in trust for each Idaho client that had not been applied to compromise that client's debt, in the total amount of \$303,218.23. The company further agreed to refrain from engaging in any activity in Idaho which requires a debt and credit counselor license; to close all Idaho accounts; and to affirmatively and conspicuously disclose in all of its advertising and promotion of its credit counseling and/or debt settlement services that such services are not available in Idaho.

December 22, 2010 THE AFFILIATED GROUP, INC., dba AFFILIATED CREDIT SERVICES (Rochester, Minnesota) – On December 22, 2010, the Idaho Department of Finance and The Affiliated Group, Inc., dba Affiliated Credit Services entered into a consent order addressing this Minnesota company's acts of operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act (the Act), to include maintaining active collection accounts in Idaho. Under the terms of the consent order, the company admitted to operating a collection agency business in Idaho while unlicensed to do so; agreed to cease and desist from all collection activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$10,000 and attorney fees and investigative costs in the amount of \$1,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company applied for and was granted an Idaho collection agency license.

NATIONAL PATIENT ACCOUNT SERVICES, INC. (Louisville, January 20, 2011 Kentucky) - On January 20, 2011, the Idaho Department of Finance and National Patient Account Services, Inc. entered into a consent order addressing this company's acts of operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act (the Act). The Department and the company agreed that the consent order resolved all matters at issue in the action without trial or adjudication of any issue of law or fact contained in the consent order, and without the company admitting the truth of, or liability for, any of the matters alleged The company paid to the Department an in the consent order. administrative penalty of \$100,000 and attorney fees and investigative costs in the amount of \$10,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company's affiliate, NPAS, Inc., applied for and was granted an Idaho collection agency license.

January 31, 2011 UNIVERSAL FIDELITY LIMITED PARTNERSHIP (Houston, Texas) – On January 7, 2011, the Director issued an order denying Universal Fidelity Limited Partnership's (UFLP) application for an Idaho collection agency license under the Idaho Collection Agency Act (the Act). The denial order was based on UFLP's acts of engaging in unlicensed collection activity in Idaho; falsely representing on UFLP's website that it held an Idaho collection agency license, when it did not; and failing to update the Department on changes concerning information required on a license application, all of which were violations of the Act.

After the Director issued the order denying UFLP's application for a collection agency license, UFLP communicated with the Department and indicated a desire to resolve the issues that led to the denial of UFLP's application for an Idaho collection agency license. On January 31, 2011,

the Department and UFLP entered into a consent order addressing UFLP's acts of operating a collection agency business in Idaho without the license required under the Act and other violations of the Act. Under the terms of the consent order, UFLP admitted to the allegations contained in the consent order, to include collecting against Idaho residents without a license; agreed to cease and desist from all collection activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$3,000 and attorney fees and investigative costs in the amount of \$2,000. UFLP further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

UFLP applied for and was granted an Idaho collection agency license.

February 4, 2011 SEATTLE SERVICE BUREAU, INC., dba NATIONAL SERVICE BUREAU (Shoreline, Washington) – On February 4, 2011, the Idaho Department of Finance and Seattle Service Bureau, Inc., dba National Service Bureau entered into a consent order addressing this Washington company's acts of operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act (the Act). Under the terms of the consent order, the company admitted to the allegations contained in the consent order, to include collecting against Idaho residents without a license; agreed to cease and desist from all collection activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$1,000 and attorney fees and investigative costs in the amount of \$1,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company applied for and was granted an Idaho collection agency license.

February 9, 2011 A NEW HORIZON CREDIT COUNSELING SERVICES, INC. (Fort Lauderdale, Florida) – On February 9, 2011, the Idaho Department of Finance and A New Horizon Credit Counseling Services, Inc. entered into a consent order addressing the company's acts of providing credit counseling services to Idaho consumers without a debt or credit counselor license under the Idaho Collection Agency Act (the Act). Under the terms of the consent order, the company admitted to the allegations contained in the consent order; and agreed to pay to the Department an administrative penalty of \$3,000 and attorney fees and investigative costs in the amount of \$1,000. The company also agreed to refund to each Idaho client all fees charged to such client for the company's services, in the total amount of \$1,259.85. The company further agreed to cease and desist from all credit and debt counseling activities in Idaho until the company obtained a license to do so in Idaho and to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company applied for, and was granted an Idaho debt and credit counselor license.

CREDIT JUSTICE SERVICES, LLC (Jacksonville, Florida) - On February 23, 2011 February 23, 2011, the Idaho Department of Finance and Credit Justice Services, LLC (Credit Justice) entered into a consent order addressing this Florida limited liability company's acts of operating a credit repair business in Idaho without the license required by the Idaho Collection Agency Act (the Act), using an Idaho-licensed loan originator as its agent with Idaho residents. Credit Justice collected approximately \$600 in fees from such Idaho residents prior to the performance of the services promised. Under the terms of the consent order, Credit Justice admitted to operating a credit repair business in Idaho while unlicensed to do so; agreed to refund to all Idaho residents the fees collected for its credit repair services; agreed to cease and desist from all credit repair activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$3,000 and attorney fees and investigative costs in the amount of \$500. Credit Justice further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

Credit Justice applied for and was granted an Idaho credit repair license.

March 3, 2011
 TODD, BREMER & LAWSON, INC. (Rock Hill, South Carolina) – On March 3, 2011, the Idaho Department of Finance and Todd, Bremer & Lawson, Inc. entered into a consent order addressing this South Carolina company's acts of operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act (the Act). Under the terms of the consent order, the company admitted to the allegations contained in the consent order, to include collecting against Idaho residents without a license; agreed to cease and desist from all collection activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$10,000 and attorney fees and investigative costs in the amount of \$1,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company applied for and was granted an Idaho collection agency license.

 March 29, 2011
 DISCOUNT DEBT SOLUTIONS, INC. (West Palm Beach, Florida) – On March 29, 2011, the Idaho Department of Finance and Discount Debt Solutions, Inc. (DDS) entered into a consent order addressing this Florida company's acts of operating a debt and credit counseling business in Idaho without the license required by the Idaho Collection Agency Act (the Act). Through the investigation of a complaint the Department received on a related company, the Department discovered that DDS had engaged in unlicensed debt and credit counseling activity in Idaho over a time period beginning in at least August 2007 to at least September 2010. That activity resulted in the company contracting with Idaho consumers and collecting at least \$8,334 in monthly fees for its services from such Idaho consumers. Under the terms of the consent order, DDS admitted to operating a debt and credit counseling business in Idaho while unlicensed to do so; agreed to refund to all Idaho consumers the fees collected for its debt and credit counseling services; agreed to cease and desist from all debt and credit counseling activities in Idaho until the company obtained a license to do so in Idaho; agreed to not apply for a debt and credit counselor license under the Act for a period of 5 years; and paid to the Department an administrative penalty of \$13,000 and attorney fees and investigative costs in the amount of \$3,000.

- DEBT SETTLEMENT SOLUTIONS, INC. (West Palm Beach, Florida) March 29, 2011 - On March 29, 2011, the Idaho Department of Finance and Debt Settlement Solutions, Inc. (DSS) entered into a consent order addressing the company's acts of contracting with Idaho consumers to provide credit counseling and/or debt settlement services to such consumers without the license required under the Idaho Collection Agency Act (the Act). Under the terms of the consent order, DSS admitted to the allegations contained in the consent order; agreed to pay to the Department an administrative penalty of \$15,000 and attorney fees and investigative costs in the amount of \$5,000. DSS also agreed to refund to each Idaho client all fees charged to such client for the company's services and all moneys being held in trust for each Idaho client that had not been applied to compromise that client's debt, in the total amount of \$46,699.86. DSS further agreed to not engage in any activity in Idaho which requires a debt and credit counselor license without holding the required license to do so; to close all Idaho accounts; to affirmatively and conspicuously disclose in all of its advertising and promotion of its credit counseling and/or debt settlement services that such services are not available in Idaho; to withdraw its pending application for a license under the Act previously filed with the Department; and to not reapply for a license under the Act for a period of 5 years from the date of the consent order.
- April 15, 2011 AMERICA'S RECOVERY SOLUTIONS, LLC (Amherst, Ohio) On April 15, 2011, the Idaho Department of Finance and America's Recovery Solutions, LLC entered into a consent order addressing this Ohio limited liability company's acts of operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act (the Act). Under the terms of the consent order, the company admitted to the allegations contained in the consent order, to include collecting against Idaho residents without a license; agreed to cease and desist from all collection activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$1,000 and attorney fees and investigative costs in the amount of \$1,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company applied for and was granted an Idaho collection agency license.

April 22, 2011 **RAUCH-MILLIKEN INTERNATIONAL, INC.** (Metairie, Louisiana) – On April 22, 2011, the Idaho Department of Finance and Rauch-Milliken International, Inc. entered into a consent order addressing this Louisiana company's acts of operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act (the Act). Under the terms of the consent order, the company admitted to the allegations contained in the consent order; agreed to cease and desist from all collection activities in Idaho until the company obtained a license to do so in Idaho; and paid to the Department an administrative penalty of \$10,000 and attorney fees and investigative costs in the amount of \$1,000. The company further agreed to abide by all provisions of the Act and rules promulgated thereunder at all times in the future.

The company applied for and was granted an Idaho collection agency license.

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

July 9, 2010 KARL RICHARD AGUILERA (Boise, Idaho) - On February 18, 2010, the Idaho Department of Finance, Consumer Finance Bureau rejected Karl Richard Aguilera's loan originator license renewal application for failure to disclose information in his renewal application and for attesting that information contained in his renewal application was true and correct, when it was not. On March 10, 2010, Mr. Aguilera requested that the Department reconsider its decision to reject his license renewal application, and on March 16, 2010, a hearing officer was appointed. Subsequently, on July 9, 2010, the Department and Mr. Aguilera entered into a consent order, resolving issues surrounding the rejection of Mr. Aguilera's renewal application. Under the terms of the consent order, Mr. Aguilera admitted that the facts contained in the consent order were true and correct and agreed to timely and sufficiently comply with all requirements of the Idaho Residential Mortgage Practices Act at all times in the future. Mr. Aguilera further agreed to update, through the Nationwide Mortgage Licensing System (NMLS), his responses to all questions included in the disclosure sections of his license renewal application.

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

- September 21, 2010 **TIMOTHY EDMUND SAMUELS** (Tracyton, Washington) On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Timothy Edmund Samuels seeking termination of his mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On September 21, 2010, the Department and Mr. Samuels entered into a consent order, resolving issues contained in the complaint. Under the terms of the consent order, Mr. Samuels admitted that he did not meet the license requirements alleged in the complaint; and that his Idaho mortgage loan originator license should be immediately terminated for failing to timely meet the licensing requirements of the Idaho S. A. F. E. Act.
- September 23, 2010 DANIEL FRANCIS NOVAR (Bloomingdale, Illinois) On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Daniel Francis Novar seeking termination of his mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On that same day, the Department received a request from Mr. Novar to voluntarily surrender his Idaho mortgage loan originator license. As a result, the action was dismissed on September 23, 2010.
- September 23, 2010 **JACK WHEELER SCOFIELD** (Liberty Lake, Washington) On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Jack Wheeler Scofield seeking termination of his mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On September 15, 2010, the Department received a request from Mr. Scofield to voluntarily surrender his Idaho mortgage loan originator license. As a result, the action was dismissed on September 23, 2010.
- September 24, 2010 **RENEE LYNN DICKINSON** (Nampa, Idaho) On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Renee Lynn Dickinson seeking termination of her mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On September 24, 2010, the Department and Ms. Dickinson entered into a consent order, resolving issues contained in the complaint. Under the terms of the consent order, Ms. Dickinson admitted that she did not meet the license requirements alleged in the complaint; and that her Idaho mortgage loan originator license should be immediately terminated for failure to timely meet the licensing requirements of the Idaho S. A. F. E. Act.

- September 28, 2010 **YELENA ANDRONIKOVNA SAAKOVA** (Post Falls, Idaho) On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Yelena Andronikovna Saakova seeking termination of her mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On September 28, 2010, the Department and Ms. Saakova entered into a consent order, resolving issues contained in the complaint. Under the terms of the consent order, Ms. Saakova admitted that she did not meet the license requirements alleged in the complaint; and that her Idaho mortgage loan originator license should be immediately terminated for failing to timely meet the licensing requirements of the Idaho S. A. F. E. Act.
- September 29, 2010 **CHARLES GRANT SAYERS** (Dove Canton, California) On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Charles Grant Sayers seeking termination of his mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On September 29, 2010, the Department and Mr. Sayers entered into a consent order, resolving issues contained in the complaint. Under the terms of the consent order, Mr. Sayers admitted that he did not meet the license requirements alleged in the complaint; and that his Idaho mortgage loan originator license should be immediately terminated for failing to timely meet the licensing requirements of the Idaho S. A. F. E. Act.
- September 30, 2010 LAURA KAE FISCHER (Nampa, Idaho) On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Laura Kae Fischer seeking termination of her mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On September 30, 2010, the Department and Ms. Fischer entered into a consent order, resolving issues contained in the complaint. Under the terms of the consent order, Ms. Fischer admitted that she did not meet the license requirements alleged in the complaint; and that her Idaho mortgage loan originator license should be immediately terminated for failing to timely meet the licensing requirements of the Idaho S. A. F. E. Act.
- September 30, 2010 ERIK FREDERICK GRIMMER (Bolingbrook, Illinios) On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Erik Frederick Grimmer seeking termination of his mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On September 30, 2010, the Department and Mr. Grimmer entered into a consent order, resolving issues contained in the complaint. Under the terms of the consent order, Mr. Grimmer admitted that he did not meet the license requirements alleged in the complaint; and that his Idaho mortgage loan originator license should be immediately terminated for failing to timely meet the licensing requirements of the Idaho S. A. F. E. Act.

- October 5, 2010 **JASON SKINROOD** (Pleasant Grove, Utah) On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Jason Skinrood seeking termination of his mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On October 5, 2010, the Department and Mr. Skinrood entered into a consent order, resolving issues contained in the complaint. Under the terms of the consent order, Mr. Skinrood admitted that he did not meet the license requirements alleged in the complaint; and that his Idaho mortgage loan originator license should be immediately terminated for failing to timely meet the licensing requirements of the Idaho S. A. F. E. Act.
- October 5, 2010 **JOHN MICHAEL REDDINGTON** (Pawtucket, Rhode Island) On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against John Michael Reddington seeking termination of his mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On October 5, 2010, the Department and Mr. Reddington entered into a consent order, resolving issues contained in the complaint. Under the terms of the consent order, Mr. Reddington admitted that he did not meet the license requirements alleged in the complaint; and that his Idaho mortgage loan originator license should be immediately terminated for failing to timely meet the licensing requirements of the Idaho S. A. F. E. Act.
- October 5, 2010 **EMANUELE DEMONTE** (Manorville, New York) On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Emanuele Demonte seeking termination of his mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On October 5, 2010, the Department and Mr. Demonte entered into a consent order, resolving issues contained in the complaint. Under the terms of the consent order, Mr. Demonte admitted that he did not meet the license requirements alleged in the complaint; and that his Idaho mortgage loan originator license should be immediately terminated for failing to timely meet the licensing requirements of the Idaho S. A. F. E. Act.
- October 7, 2010 **TREVOR WILLIAM ADAMS, JR.** (Kuna, Idaho) On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Trevor William Adams, Jr. seeking termination of his mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On October 7, 2010, the Department and Mr. Adams entered into a consent order, resolving issues contained in the complaint. Under the terms of the consent order, Mr. Adams admitted that he did not meet the license requirements alleged in the complaint; and that his Idaho mortgage loan originator license should be immediately terminated for failing to timely meet the licensing requirements of the Idaho S. A. F. E. Act.

October 7, 2010 **ROBERT JAMES LEWIS IV** (Frisco, Texas) – On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Robert James Lewis IV seeking termination of his mortgage loan originator license for failure to meet the new Idaho S. A. F. E. Act requirements by the July 31, 2010 deadline. On October 7, 2010, the Department and Mr. Lewis IV entered into a consent order, resolving issues contained in the complaint. Under the terms of the consent order, Mr. Lewis IV admitted that he did not meet the license requirements alleged in the complaint; and that his Idaho mortgage loan originator license should be immediately terminated for failing to timely meet the licensing requirements of the Idaho S. A. F. E. Act.

October 26, 2010 **DEFAULT ORDERS TERMINATING IDAHO MORTGAGE LOAN ORIGINATOR LICENSES** – On September 14, 2010, the Idaho Department of Finance issued an administrative complaint against Idaho licensed mortgage loan originators seeking termination of such mortgage loan originator licenses for failure to meet the Idaho S.A.F.E. Act requirements by the July 31, 2010 deadline. Then, on October 26, 2010, the Director issued a default order terminating the mortgage loan originator licenses issued to the following individuals:

- 1. Anthony Edward Agolini (Jacksonville, Florida)
- 2. Jose L. Alamo (Auburn, Washington)
- 3. Nancy Lea Arnold (Lewisville, Texas)
- 4. Lori Anne Burruss (Coeur d'Alene, Idaho)
- 5. Russell Jeremy Carpenter (Caldwell, Idaho)
- 6. Craig Corey Christensen (Pocatello, Idaho)
- 7. Joshua Gary Christian (Gallup, New Mexico)
- 8. Kraige Michael Clark (Sagle, Idaho)
- 9. Adam Ryan Conklin (Star, Idaho)
- 10. Robert Terrell Cooper (Mount Airy, Maryland)
- 11. George Ellsworth Cremeans, Jr. (Westerville, Ohio)
- 12. Amber Danielle Dilworth (Boise, Idaho)
- 13. Tracye Lyn Dudzinski (Frisco, Texas)
- 14. Richard Scott Ferguson (Irving, Texas)
- 15. Todd Garcia (Twin Falls, Idaho)
- 16. Richard Christopher Hardy (McKinney, Texas)
- 17. Daniel Richard Hunt, Jr. (Irving, Texas)
- 18. Todd Jeremy Husson (Martinsburg, West Virginia)
- 19. Matthew R. Koppel (Hayden, Idaho)
- 20. Anton Levdanskiy (Jerome, Idaho)
- 21. Brian Anthony Lima (Newport, Rhode Island)
- 22. Jeremy Melvin Madsen (Rigby, Idaho)
- 23. David Leslie Miles, Jr. (Denton, Texas)
- 24. Michael Tobey Minier (Costa Mesa, California)
- 25. Elisabet Montoya (Nampa, Idaho)
- 26. Mark Neesham (Irvine, California)

- 27. Greg Paul Newman (Agoura Hills, California)
- 28. Lauren Tu Nguyen (Dallas, Texas)
- 29. Terri M. O'Neal (Boise, Idaho)
- 30. Lindsay Rachelle Osborn (Boise, Idaho)
- 31. Kristin Noel Pechstein (Aliso Viejo, California)
- 32. Emily Ann Phenix (Fall River, Massachusetts)
- 33. Alfred Piccinini (Baltimore, Maryland)
- 34. Josh David Polfer (Nampa, Idaho)
- 35. Justin Shane Ragan (Keller, Texas)
- 36. Aaron M. Rios (Pocatello, Idaho)
- 37. Patrick Anthony Sanchez (Plano, Texas)
- 38. Pedro Enrique Sanchez (Huntington Beach, California)
- 39. Michael Peter Segovia (Costa Mesa, California)
- 40. Elizabeth Segoviano (Dallas, Texas)
- 41. Andrew Sivilay (Boise, Idaho)
- 42. Anna Elizabeth Smylie (Star, Idaho)
- 43. David Joseph Spencer (Haddon Heights, New Jersey)
- 44. Wesley Eugene Sutterer (O'Fallon, Missouri)
- 45. Kenneth Craig Taitt (Los Angeles, California)
- 46. Lisa-Marie Thompson (Sanger, Texas)
- 47. Brian Emmet Thorell (Boise, Idaho)
- 48. Cynthia Velazquez (Irving, Texas)
- 49. William Douglas Vincent II (Upper Marlboro, Maryland)
- 50. Shannon J. Walker (Dallas, Texas)
- 51. John Jacob Wert III (Newmanstown, Pennsylvania)
- 52. Clint Allen Whitney (Boise, Idaho)
- 53. Ryan Michael Wilkerson (Hampstead, Maryland)
- 54. Dale Michael Wood (Orem, Utah)
- 55. Trisha Marie Zazueta (Jerome, Idaho)

In each order, the Director found that the above-referenced mortgage loan originators had failed to meet the Idaho S.A.F.E. Act requirements. The default termination orders resulted from the above-referenced mortgage loan originators' failure to file an answer to the Department's complaint seeking termination of their respective licenses.

EXHIBIT VII

DEPARTMENT OF FINANCE STAFF – JUNE 30, 2011

ADMINISTRATION

Gavin M. Gee Shirley A. Whitney Director of Finance Administrative Assistant 2

SUPPORTING SERVICES BUREAU

David L. Jensen David S. Wentland Homero P. Rodriguez Vacant Angela M. Baker Jill R. Peterson-Pate Caroline C. Dickson Supporting Services Bureau Chief IT Systems Integration Analyst, Sr. Web Developer IT Programmer Analyst, Sr. Personnel Technician Financial Specialist Office Specialist 2

FINANCIAL INSTITUTIONS BUREAU

Mary E. Hughes Nancy Page Lisa A. Baker Richard J. Sherrick George L. Baker Brad P. Bergquist Bruce M. Eames Mark W. Boschulte Connie D. Newgard Andrew C. Forth Krista M. Bolt Honalee R. Thomas Michael Worthington Jeffrey C. Reinhardt Geoff L. Coonce James J. Tunca Gordon E. Titus Kayce C. Lamb Michael Bergey

CONSUMER FINANCE BUREAU

Mike Larsen Christina Courtright Karen A. Carlyle Martha (Marti) L. Cooper Carol Berenger Linda J. Tennyson Anthony T. Polidori Karlyne C. (K.C.) Schaler Jo Ann Lanham Erin J. Van Engelen Billie K. Havery Dan D. Kline Jan L. Kochan Tom S. Little Tom H. Nate Vacant

Financial Institutions Bureau Chief Administrative Assistant 1 (Doublefill - Retired July 2011) Administrative Assistant 1 Financial Institutions Examiner, Commissioned Sr. Financial Institutions Examiner, Commissioned Financial Institutions Examiner, Commissioned Financial Institutions Examiner, Commissioned Financial Institutions Examiner 3* Financial Institutions Examiner 3* Financial Institutions Examiner 2* Financial Institutions Examiner 2* Financial Institutions Examiner 2* Financial Institutions Examiner 1* Financial Institutions Examiner 1* Financial Institutions Examiner 1* Financial Institutions Examiner 1* *underfilling Financial Institutions Examiner, Commissioned

Consumer Finance Bureau Chief Administrative Assistant 1 Administrative Assistant 1 Administrative Assistant 1 Office Specialist 2 Office Specialist 2 Financial Examiner/Investigator 4 Financial Examiner/Investigator 4 Consumer Affairs Officer Financial Examiner/Investigator 3 Financial Examiner/Investigator 2* Financial Examiner/Investigator 1* *underfilling Financial Examiner/Investigator 3

SECURITIES BUREAU

Marilyn T. Chastain Katy M. Witt Virginia L. Sorensen Mary J. Harper James A. Burns Patricia R. Highley Nancy C. Ax Walter L. Bitner Coleen F. Hodson Timothy D. Martin Kurt V. Merritt

LEGAL STAFF

Joseph B. Jones Alan Conilogue Rene A. Martin Rita Jensen Securities Bureau Chief Administrative Assistant 1 Securities Technician Technical Records Specialist 1 Financial Examiner/Investigator 4 Financial Examiner/Investigator 3 Financial Examiner/Investigator 2* *underfilling Financial Examiner/Investigator 3

Deputy Attorney General (On assignment from AG) Deputy Attorney General (On assignment from AG) Deputy Attorney General (On assignment from AG) Paralegal (On assignment from AG)

YEARS OF STATE SERVICE AS OF JUNE 30, 2011 Recognizing Almost 600 years of Combined Service to the State of Idaho

Shirley A. Whitney	41.6	Years of Service
Gavin M. Gee	36.2	Years of Service
Brad P. Bergquist	30.6	Years of Service
George L. Baker	28.5	Years of Service
Katy M. Witt	27.3	Years of Service
Ginnie L. Sorensen	26.8	Years of Service
Marilyn T. Chastain	23.8	Years of Service
James A. Burns	23.8	Years of Service
Tim D. Martin	22.1	Years of Service
Patricia R. Highley	21.5	Years of Service
Mary E. Hughes	21.0	Years of Service
Marti L. Cooper	20.0	Years of Service
Jo Ann Lanham	19.4	Years of Service
Coleen F. Hodson	18.4	Years of Service
Bruce M. Eames	17.5	Years of Service
Mike Larsen	15.7	Years of Service
Mary J. Harper	14.3	Years of Service
Billie K. Havery	14.3	Years of Service
Jill R. Peterson-Pate	14.2	Years of Service
K. C. Schaler	13.2	Years of Service
Nancy C. Ax	13.1	Years of Service
Anthony T. Polidori	10.5	Years of Service
Mark W. Boschulte	10.0	Years of Service
Walt L. Bitner	9.9	Years of Service
Karen A. Carlyle	8.7	Years of Service
Rick J. Sherrick	7.7	Years of Service
Connie D. Newgard	7.5	Years of Service
Andy C. Forth	6.8	Years of Service
Jan L. Kochan	6.7	Years of Service
David L. Jensen	6.5	Years of Service
Daniel D. Kline	6.2	Years of Service
Erin J. Van Engelen	5.8	Years of Service
David S. Wentland	5.7	Years of Service
Angela M. Baker	5.1	Years of Service
Tom S. Little	4.7	Years of Service
Honalee R. Thomas	4.1	Years of Service
Linda J. Tennyson	3.6	Years of Service
Carol A. Berenger	3.5	Years of Service
Kurt V. Merritt	3.0	Years of Service
Geoff L. Coonce	3.0	Years of Service
Caroline C. Dickson	2.8	Years of Service
Krista M. H. Bolt	2.8	Years of Service
Tom H. Nate	2.3	
	2.4 1.8	Years of Service
Jeffrey C. Reinhardt	1.8	Years of Service
Gordon E. Titus James J. Tunca		Years of Service
	.9	Years of Service
Homero P. Rodriguez	.7	Years of Service
Lisa A. Baker	.3	Years of Service
Kayce C. Lamb	.2	Years of Service
Michael H. Bergey	.2	Years of Service

EXHIBIT VIII

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.

EXHIBIT IX

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.

EXHIBIT X

Annual Report Credits

Project Management, Compilation, Layout, and Design	David Jensen
Compilation of Financial Institutions SectionConnie N Lisa	Newgard, Krista Bolt, Rick Sherrick, 1 Baker, Brad Bergquist, Mary Hughes
Compilation of Securities Section	Marilyn Chastain, Jim Burns
Compilation of Consumer Finance Section	Anthony Polidori, Mike Larsen, C. Schaler, Rene' Martin, Rita Jensen
Compilation of Department Financial Report	Jill Peterson-Pate
Director	Gavin M. Gee
Financial Institutions Bureau Chief	Mary E. Hughes
Securities Bureau Chief	Marilyn Chastain
Consumer Finance Bureau Chief	Mike Larsen
Supporting Services Bureau Chief	David Jensen