

2017

112TH ANNUAL REPORT

C.L. 'Butch' Otter
Governor

Gavin M. Gee
Director



IDAHO

DEPARTMENT OF FINANCE

Protecting the Integrity of Idaho Financial Markets Since 1905



IDAHO
DEPARTMENT OF FINANCE

July 1, 2017

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

Dear Governor Otter:

I am pleased to submit herewith the 112th Annual Report of the Department of Finance for fiscal year 2017, July 1, 2016 through June 30, 2017.

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. Department financial services sector licensing and registrations increased some 5 percent over last fiscal year. As a result, the Department was able to transfer \$5.3 million to the State's General Fund.

The Department provides regulatory oversight for multiple financial services industries and undertakes enforcement actions where necessary. This past fiscal year, Department enforcement actions resulted in over \$800,000 in restitution/rescission/refunds ordered for the benefit of Idaho residents. Beyond its regulatory oversight functions and enforcement activities, the Department continued its efforts to promote economic development, appropriately reduce regulatory burdens, improve financial literacy, and protect financial service consumers in the state. A few examples of these efforts are:

- Supporting federal legislation and regulatory efforts to reduce the federal regulatory burden on Idaho financial services businesses, including "Right-Size Regulation" for community banks and smaller financial institutions.
- Expanding the use of online access to certain data in order to perform more of the Department's regulatory examinations off-site, reducing travel expenses and the amount of time spent in the offices of certain licensees.

Continuing the Department's participation and/or sponsorship of *America Saves and Military Saves Week*, the *18th Annual Financial Literacy Month*, "*Bank On Treasure Valley*," two *Scam Jam events*, and two *Smart Women Smart Money: Idaho Everywoman's Financial Conferences*. Department staff also conducted a number of financial educational outreach events that touched Idaho schools, prisons, and service members.

Finally, the Department again conducted a Town Hall Meeting with Idaho community bankers and participated in a national community banking research/policy initiative alongside the Federal Reserve System and the Conference of State Bank Supervisors. The initiative focused on the challenges and opportunities facing community banks with the goal of developing policy initiatives to support the vital role of community banks.

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 and hard work of our superb employees.

Sincerely,

GAVIN M. GEE, Director
Idaho Department of Finance

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About The Cover:

The water fountain at MK / WGI Plaza, 720 Park Blvd., Boise. This beautiful fountain is designed to work while frozen and at sub-freezing pictures. Photo: David Jensen

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:

<i>Idaho Bank Act</i>	<i>Idaho Credit Code</i>
<i>Idaho Bank Holding Company Act</i>	<i>Idaho Mortgage Company Act</i>
<i>Idaho Interstate Banking Act</i>	<i>Idaho Collection Agency Act</i>
<i>Idaho Interstate Branching Act</i>	<i>Idaho Uniform Securities Act</i>
<i>Idaho International Banking Act</i>	<i>Idaho Residential Mortgage Practices Act</i>
<i>Idaho Trust Institutions Act</i>	<i>Business Combination Act</i>
<i>Idaho Savings Bank Act</i>	<i>Control Share Acquisition Act</i>
<i>Business and Industrial Development Corporation Act (BIDCO)</i>	<i>Idaho Commodity Code</i>
<i>Idaho Credit Union Act</i>	<i>Endowment Care Cemetery Act</i>
<i>Idaho Money Transmitters Act</i>	<i>Continuing Care Disclosure Act</i>
<i>Idaho Financial Fraud Prevention Act</i>	<i>Idaho Escrow Act</i>
	<i>Idaho Loan Broker Act</i>

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. This year the Department processed more than 191,000 business filings, licenses and registrations for companies 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.

REGULATORY 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 endeavors to improve the quality of its regulation and reduce regulatory burdens, while also expanding educational opportunities for both industry and consumers.

Legislation and Rulemaking

The 2017 Idaho Legislature passed House Bill 118, amending the Idaho Endowment Care Cemetery Act to make one technical correction and to grant the Director of the Department of Finance temporary authority regarding the proper administration of cemetery endowment care funds held by an endowment care cemetery.

By way of negotiated rulemaking, the Securities Bureau revised and updated the Rules Pursuant to the Idaho Uniform Securities Act with no objection or revision by the 2017 Idaho Legislature. The Consumer Finance Bureau also undertook a successful rulemaking to update references to federal laws and regulations incorporated into Idaho’s Rules Pursuant to the Idaho Residential Mortgage Practices Act.

Community Banking Initiative - In support of Idaho community banks, the Department participated in the fifth annual Community Banking in the 21st Century Research and Policy Conference, sponsored by the Federal Reserve System and the Conference of State Bank Supervisors (CSBS). The conference was held October 4 – 5, 2017, at the Federal Reserve Bank of St. Louis. The conference brought together community bankers, academic experts, and federal and state policymakers to discuss the latest research on community banking. In preparation, the Department met with Idaho community bank Chief Executive Officers to discuss issues unique to their industry, which were contained within “Five Questions for Five Bankers.” In addition, a National Survey of Community Banks was administered by state banking commissioners in 37 states. A total of 611 community bankers participated in the survey. A report, *Community Banking in the 21st Century*, was issued following the conference, along with the results of the survey taken

by community bankers. The report provides a comprehensive view of opportunities and challenges facing community banks with emphasis on small business lending, compliance costs, and the changing nature of products or services offered by community banks. This is an ongoing initiative that the Department will continue to work on with industry, and state and federal policymakers.

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.
- 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.
- The Department provides online collection agency agent-registration and quarterly reporting capability through the Access Idaho portal. Although use of the online process is optional, approximately 90 percent of Idaho’s licensed collection agencies have transitioned from paper filings with check payments to online filings, record retention, and multiple payment options.
- Consumer finance companies, money transmitters, payday lenders and collection agencies continue to utilize the option of obtaining and renewing licenses through the Nationwide Multistate Licensing System (NMLS). Significant enhancements to the NMLS are projected to be finalized by the third quarter of 2018 with the rollout of NMLS 2.0, which will make the online licensing system even more functional and user friendly across multiple industries. As of the end of fiscal year 2017, 51.3 percent of all companies and 65.6 percent of all branch locations licensed under the Idaho Credit Code had opted to utilize the NMLS for license maintenance. For the same period, 90 percent of companies licensed under the Idaho Money Transmitters Act and 49.6 percent of companies licensed under the Idaho Collection Agency Act had opted to utilize the NMLS over the less efficient and more time-consuming “paper licensing process.” Use of the NMLS improves licensing efficiencies for state regulators and companies and is increasingly being utilized throughout the U.S. by state licensed entities.
- The Department continues to remain abreast of developing issues in the emerging payment systems space, including working with industry and other regulators to address these issues.

EDUCATIONAL INITIATIVES

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. To this end, 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. Program highlights this year include:

- ***FFIEC IT Symposium*** – Financial Institution Examiner James Tunca participated in the 2016 FFIEC IT Symposium to develop a recommendation for the FFIEC IT Subcommittee to consider changes to the supervisory and examination processes relating to Cloud Computing.
- ***State Liaison Committee for the FFIEC*** – Financial Institutions Bureau Chief Mary Hughes was reappointed to the State Liaison Committee for the Federal Financial Institutions Examination Council.
- ***FDIC Idaho Bankers Roundtable*** – The Department participated in the FDIC Idaho Bankers Roundtable to discuss industry issues with Idaho bank management, including cybersecurity, consumer protection and compliance examinations, community bank regulatory burden relief, and economic trends.
- ***Bank Directors' College*** – The Department participated in the 2016 Bank Directors' College, sponsored by the FDIC and the Idaho Bankers Association.
- ***Immediate Past President and Executive Committee Member of the National Association of Consumer Credit Administrators (NACCA)*** – Consumer Finance Bureau Chief Mike Larsen concluded his term as President of the National Association of Consumer Credit Administrators (NACCA) for the 2016-2017 term and assumed his role as “Immediate Past President” on NACCA’s 2017-2018 Executive Committee.
- ***Nationwide Multi-State Licensing System (NMLS)*** Consumer Finance Bureau Supervising Examiner K.C. Schaler is co-chair of the NMLS Steering Committee tasked with a total rebuild of the NMLS for nationwide use.
- ***President of the North American Collection Agency Regulatory Association (NACARA)*** – Consumer Finance Bureau Supervising Examiner Anthony Polidori concluded his record-setting third term as President of NACARA during the 2016-2017 term.

Department staff participated in additional meetings during the year with representatives of the financial services industry and regulators, including: Idaho Bankers Association Annual Convention, CSBS Deputy/Legal Seminar, NASCUS Cybersecurity Symposium, NASCUS Summit, CSBS Performance Standards Committee Meetings, Western Region Interagency Meetings, NASCUS Regional Regulators Meeting, NASCUS National Meeting, CSBS Fly-In, American Association of Residential Mortgage Regulators (AARMR) Annual Regulatory Conference, National Association of Consumer Credit Administrators (NACCA) Annual Meeting

and Regulators' Training Symposium, North American Collection Agency Regulatory Association (NACARA) Annual Regulatory Conference, and the Nationwide Multistate Licensing System (NMLS) Annual Conference and Training.

Consumer Educational Efforts – The Department has a long tradition of providing educational resources to Idahoans. The Department provides educational presentations and materials on a variety of topics including investment fraud and consumer credit issues. Among the Department's efforts this year:

- **Smart Women, Smart Money Financial Conferences** – The Department provided monetary sponsorship and staff support for this important annual conference hosted by the Office of the State Treasurer. Conferences were held in Boise in February 2017 and in Moscow in September 2017. The primary purpose of these events is to educate women in financial matters. At these annual events in Boise and Moscow, the Department provides speakers and staffs a booth from which conference attendees may obtain free financial educational materials.
- **Financial Literacy Month** – Joining other state securities regulators and a broad-based coalition of consumer groups and industry members, the Department participated in the annual Financial Literacy Month during April. Kicked off with Governor C. L. “Butch” Otter’s Proclamation that “April is Financial Literacy Month,” the Department distributed educational materials and made presentations designed to increase financial knowledge and help Idahoans recognize and avoid securities fraud. The Department hosted a Financial Literacy Month section on its website listing many of the activities and events scheduled during the month.
- **Scam Jams** – The Department, a member of the Idaho Scam Jam Alliance (ISJA), joined other ISJA members to host 2017 Scam Jam Conferences in Caldwell and Twin Falls. The ISJA is a coalition of non-profit entities and government agencies dedicated to fighting fraud through sponsorship of free Scam Jams throughout Idaho. Attendees of the 2017 Scam Jams were provided information on investment fraud, financial scams, Medicare fraud, local law enforcement cases, and tips on how to avoid becoming a victim of identity theft. The Department participated in chairing and leading the ISJA while also staffing a booth for the event where free financial educational materials were provided to attendees.
- **Idaho Military Financial Alliance** – The Department has been a participating member of the Idaho Military Financial Alliance (IMFA) since 2013. IMFA is comprised of non-profit entities, credit unions, government and military agencies and strives to build awareness and mobilize the financial community on behalf of service members and their families. In 2017, the Department participated in sponsoring Military Saves Week and “Operation Financial Freedom-Building the Reserves YOU Deserve!”
- **America Saves Week** – The Department joined agencies throughout the United States to celebrate America Saves Week. America Saves Week is an annual nationwide event and an opportunity for organizations to promote savings and a chance for individuals to assess

their own savings status. The America Saves program seeks to encourage and support households to save money, reduce debt, and build wealth.

- ***Bank On Treasure Valley*** – “Bank On” is a program with the United Way that aims to improve the financial health of our community by reducing the number of unbanked and under-banked individuals. The program strives to give a second chance to the unbanked community by providing financial education to its participants and by promoting the use of traditional banking services. The Department worked with area financial institutions to market “Bank On.” In addition, Department staff volunteered their time as instructors.

Notable Trends and Events

- Continuing efforts to reduce data reporting and other burdens for small financial institutions, the Federal Financial Institutions Examination Council implemented a streamlined Call Report for financial institutions with domestic offices only and less than \$1 billion in total assets. Nearly 90 percent of all institutions required to file Call Reports qualified for the streamlined report, which reduced the report from 85 to 61 pages, resulting from the removal of approximately 40 percent of the 2,400 data items. The streamlined Call Report went into effect on March 31, 2017.
- The National Credit Union Administration modified its Member Business Lending (MBL) Rule, which went into effect on January 1, 2017. The modified MBL Rule is meant to provide federally insured credit unions that make business loans with greater flexibility and more autonomy, allowing credit unions to have the ability to better meet the needs of its members. The rule changed from a prescriptive approach to a principles-based methodology that emphasizes sound risk management practices for business lending. The rule eliminates most prescriptive lending limits and the corresponding waiver provisions. The rule also distinguished the policy and program responsibilities for commercial loans from the statutory limit on MBLs.
- Idaho’s federally insured credit unions (both state- and federally-chartered institutions) experienced favorable rankings in numerous key indicators of financial health and viability, as evidenced by a press release issued by the National Credit Union Administration on September 14, 2017. NCUA’s press release references a Quarterly U.S. Map Review, which provides data for the year ending June 30, 2017. Highlights of Idaho credit union successes are detailed below:
 - Idaho had the highest median asset growth in the nation, at 9.0 percent. Nationally, the median asset growth rate was 3.9 percent.
 - Idaho also had the highest median deposit growth in the nation, at 9.8 percent. Nationally, the median deposit growth rate was 4.1 percent.
 - Idaho’s credit unions experienced the fourth highest median membership growth rate in the nation, at 2.1 percent. Nationally, the median membership growth rate was negative 0.1 percent.

- Idaho has the third highest median loan-to-share ratio in the nation, at 87 percent. Nationally, the median loan-to-share ratio was 63 percent.

INDUSTRY RESULTS IN IDAHO

Banking in Idaho – Idaho-based banks continued to exhibit stable or improved performance and financial condition over the past year. As of June 30, 2017, the average aggregate return on assets remained relatively stable and declined 3 basis points to 0.93 percent for Idaho-based banks, compared to a 7 basis-point increase to 1.09 percent for banks nationwide. The net interest margin for Idaho-based banks improved from 3.94 percent to 3.98 percent, which compared favorably to the national average of 3.21 percent. The ratio of net charge-offs to loans and leases improved 11 basis points to negative 0.02 percent for Idaho-based banks, significantly outperforming the national average of 0.49 percent. The ratio of non-current loans to loans increased 29 basis points to 0.76 percent, but compares favorably to the national average of 1.23 percent. The core capital ratio for Idaho-based banks declined 36 basis points to 11.46 percent but continues to outperform the national average, which increased 12 basis points to 9.69 percent.

Credit Unions in Idaho - Idaho state-chartered credit unions exhibited strong financial performance in calendar year 2016, outperforming peer credit unions in several key areas. The aggregate Return on Average Assets ratio for Idaho state-chartered credit unions improved from 1.19 percent in 2015, to 1.30 percent in 2016, which was 54 basis points higher than the national peer group average. Asset quality factors were also favorable for Idaho state-chartered credit unions when compared to the national peer group average. Specifically, the Delinquent Loans to Total Loans ratio of 0.39 percent was 44 basis points lower than that of the national peer group, while the Net Charge-Offs to Average Loans ratio of 0.25 percent was 30 basis points lower than that of the national peer group average. In the aggregate, Idaho state-chartered credit unions generally demonstrated adequate capital levels with an average Net Worth to Total Assets ratio of 9.33 percent, an increase from the 9.08 percent reported as of year-end 2015.

Consumer Finance –This year, the Department had regulatory oversight responsibility for 639 licensed regulated lender and title lender office locations, 158 licensed payday lender office locations, and 894 licensed mortgage broker/lender office locations. The number of licensed mortgage loan originators in Idaho grew from 3,467 in 2016, to 4,241 at 2017 fiscal year-end, a 22.3 percent year-over-year increase. In addition, the Consumer Finance Bureau had regulatory oversight responsibility for 600 licensed collection agencies, 70 debt buyers, 9 credit repair organizations, and 37 credit/debt counselor agencies. The number of collection agency solicitors/collectors registered in Idaho grew from 50,971 in 2016, to 57,704 at 2017 fiscal year-end, a 13.2 percent year-over-year increase. Also in 2017, the Consumer Finance Bureau's consumer affairs office received 230 written complaints against various consumer financial service providers. As a result of mediating several such complaints, the Consumer Finance Bureau returned approximately \$32,235 to Idaho consumers.

Securities – For the eighth year in a row, submissions to the Securities Bureau increased and exceeded more than 126,000 in fiscal year 2017. The Bureau’s oversight extends to nearly 114,000 individuals who currently hold Idaho registrations as broker-dealer agents, investment adviser representatives and issuer agents. Through civil and administrative sanctions, the Bureau obtained orders for over \$800,000 in restitution and rescission for Idaho investors, while imposing fines of nearly \$300,000.

FINANCIAL INSTITUTIONS BUREAU

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

The Financial Institutions Bureau is responsible for promoting the safety and soundness of state-chartered commercial banks, savings banks, credit unions, bank holding companies, trust companies, and business and industrial development corporations operating in Idaho. The Bureau assesses the condition of these institutions so that the public can have confidence in the financial system, and so 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 Credit Union Act*, *Idaho Financial Fraud Prevention Act*, *Idaho International Banking Act*, *Idaho Interstate Banking Act*, *Idaho Interstate Branching Act*, *Idaho Savings Bank Act*, *Idaho Trust Institutions Act*, and the *Business and Industrial Development Corporation Act*. The Bureau provides high quality supervision of state-chartered institutions directed at identifying material 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 state-chartered financial institutions filed with the Department.

The Bureau works closely with federal and other state regulators to provide regulated industries with seamless supervision, minimal disruption and costs, and effective use of resources. The Department continues its joint compliance examination program entered into with the Federal Deposit Insurance Corporation (FDIC) 14 years ago. Idaho is one of few states that have a formal agreement with the FDIC on conducting joint compliance examinations. The joint compliance examinations, in addition to joint risk management examinations, result in more efficient and less burdensome bank examinations.

The Department is strongly committed to providing effective regulation without excessive costs. Our fees remain among the lowest in the nation; we do not charge examination fees and process most applications for nominal or no fees. Idaho financial institutions incur significantly less regulatory costs than their federal counterparts.

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 Department's bank and credit union sections have been continuously accredited by CSBS and NASCUS since 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 most recently occurred in 2015.

Education and Examiner Training - Continuing education and training are important to maintaining accreditation and the confidence of those we regulate. The Department continues to support educational opportunities for its examiners. During fiscal year 2017, examiners attended training sessions provided or sponsored by the FDIC, the Federal Reserve System, the National Credit Union Administration, CSBS, NASCUS, and Pacific Coast Banking School (PCBS) in partnership with the University of Washington. The ten examiners assigned to the Banking Section attended 35 weeks of training during the fiscal year, and the six examiners assigned to the Credit Union Section attended 16 weeks of training. In addition, the examiners complete on-line training and participate in webinars on emerging issues.

BANKING SECTION

The Banking Section is responsible for supervising Idaho's state-chartered commercial banks, savings banks, and bank holding companies 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 trust departments within financial institutions, non-depository trust companies, and business and industrial development corporations (BIDCOs). With the conversion of Twin River Bank (formerly Twin River National Bank) from a federal charter to a state charter in June 2017, the Banking Section directly supervised 12 commercial banks (3 with trust powers) and a single BIDCO as of June 30, 2017.

The section also has regulatory oversight responsibilities, as the host state supervisor, for 11 state-chartered banks operating in Idaho and chartered by other states. As of June 30, 2017, these institutions held \$4.5 billion of Idaho deposits and operated 107 offices throughout the state: Banner Bank (14 branches), Columbia Bank (14 branches), Inland Northwest Bank (3 branches), and Washington Trust Bank (15 branches) are chartered by the State of Washington; Bank of the West (5 branches) and Sunwest Bank (3 branches) are chartered by the State of California; Bank of the Cascades (14 branches) and Umpqua State Bank (15 branches) are chartered by the State of Oregon; Glacier Bank (22 branches) is chartered by the State of Montana; People's Intermountain

Bank, formerly Lewiston State Bank, (1 branch) is chartered by the State of Utah; and Bell Bank, (1 representative trust office) is chartered by North Dakota. As a host state supervisor, the Banking Section also has indirect supervision over 11 bank or financial holding companies.

In fiscal year 2017, the Banking Section completed eight risk management examinations, two of which included concurrent trust examinations, and six consumer compliance examinations. In conjunction with the risk management examinations, information technology and Bank Secrecy Act/Anti-Money Laundering examinations were performed. In addition, the Banking Section participated in one host-state risk management examination.

Branch Activities

Branching and relocation activity in Idaho continued throughout fiscal year 2017. D.L. Evans Bank opened a branch in Rigby; Northwest Bank opened a branch in Liberty Lake, Washington; and Idaho First Bank opened two new branches in New Meadows and Eagle. Two banks relocated branches: D.L. Evans Bank relocated a Caldwell branch and Umpqua Bank relocated a Boise branch. Host state banks closed several branches in Idaho in fiscal year 2017. Columbia State Bank closed two branches in Fruitland and Twin Falls; Inland Northwest Bank closed a branch in Post Falls; and Umpqua Bank closed a branch in Moscow.

Conversions

Twin River Bank converted from a national bank to a state-chartered bank, effective June 9, 2017. Twin River Bank is headquartered in Lewiston, and has four branches: two located in Lewiston, and one each in Clarkston and Asotin, Washington.

IDAHO BANKING INDUSTRY REVIEW

Performance and Condition of Idaho Financial Institutions

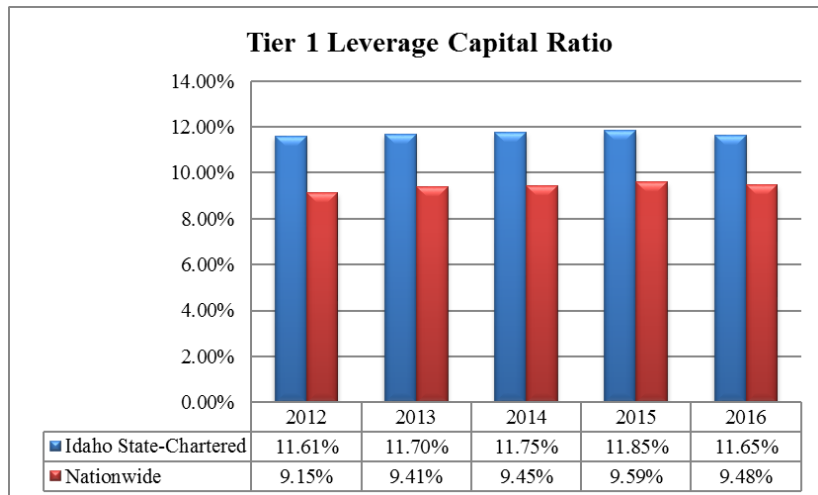
As of June 30, 2017, there were 13 financial institutions (12 state-chartered banks and 1 federal savings bank) based in Idaho with combined assets of \$5.9 billion, net loans and leases of \$3.8 billion, and deposits of \$5.0 billion. Idaho-based institutions outperformed institutions nationwide with higher average core capital (leverage ratio) of 11.46 percent versus 9.69 percent, higher net interest margin of 3.98 percent versus 3.21 percent, lower ratio of net charge-offs to loans of negative 0.02 percent versus 0.49 percent, and lower ratio of noncurrent loans to total loans of 0.76 percent versus 1.23 percent. The return on assets for Idaho-based institutions declined 3 basis points to 0.93 percent as of June 30, 2017, compared to an increase of 7 basis points to 1.09 percent for all institutions nationwide. In addition, all of Idaho's institutions remained "well-capitalized" under state and federal capital standards as of June 30, 2017.

Deposits in Idaho

As of June 30, 2017, 32 commercial banks and savings institutions with 496 offices competed for deposits in Idaho. Total deposits in Idaho increased 7.8 percent during the fiscal year from \$23.2 billion to \$25.0 billion. Institutions headquartered outside of the state retained 81 percent of the market share of Idaho deposits, or \$20.4 billion, as of June 30, 2017. The remaining 19 percent, or \$4.7 billion, of deposits was shared between the 13 Idaho-based institutions.

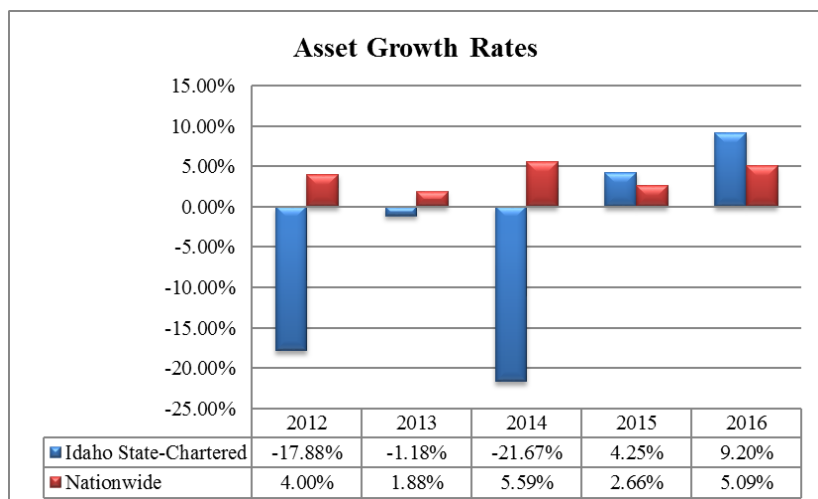
Capital Levels at Idaho State-Chartered Banks

Idaho state-chartered banks reported a decrease in the average Tier 1 Leverage Capital ratio from 11.85 percent as of December 31, 2015, to 11.65 percent as of December 31, 2016, but continued to exceed the 9.48 percent average for all banks in the nation. Total equity capital of state-chartered banks increased 5.1 percent, from \$564.2 million to \$593.2 million, in 2016. The average Tier 1 Risk-Based Capital ratio decreased from 16.30 percent to 15.52 percent, and the average Total Risk-Based Capital ratio decreased from 17.44 percent to 16.63 percent. Despite the declines, both of these ratios compared favorably to the national average of 12.96 percent and 14.34 percent, respectively.



Asset and Deposit Growth in Idaho State-Chartered Banks

Asset and deposit growth continued for Idaho-chartered banks in 2016. As of year-end 2016, total assets in Idaho-chartered banks increased 9.2 percent from \$4.6 billion to \$5.1 billion. Nationwide, total assets in all banks grew 5.1 percent, increasing from \$16.0 trillion to \$16.8 trillion. Asset growth at both Idaho-chartered banks and nationwide was primarily supported by net loan growth. At Idaho-chartered institutions, net loans increased 13.0 percent from \$2.8 billion to \$3.2 billion, while net loans at banks nationwide increased 5.3 percent from \$8.7 trillion to \$9.2 trillion. For

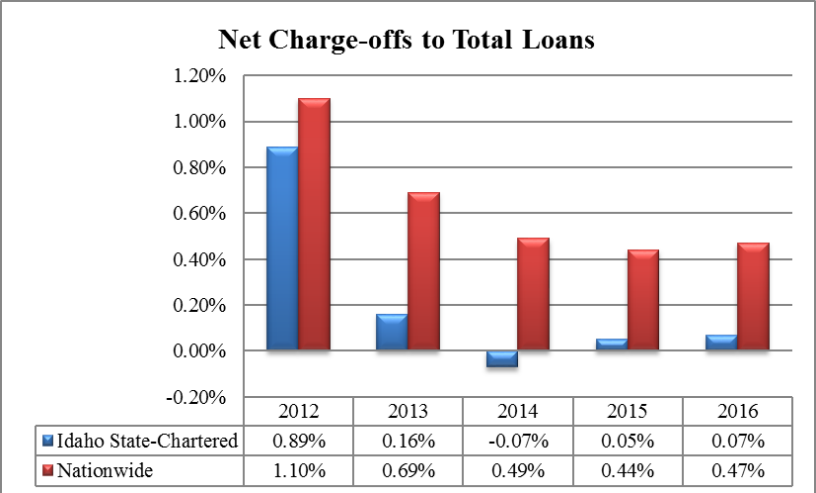


Idaho-chartered banks, real estate lending was the primary contributor to loan growth with a 13.5 percent increase from \$1.8 billion to \$2.0 billion. The majority of real estate loan growth occurred in the construction and development, commercial real estate, and 1-to-4 family residential loan segments. Similarly, all banks nationwide experienced the majority of loan growth in real estate. Real estate loans increased 5.2 percent from \$4.4 trillion to \$4.6 trillion and were primarily comprised of loans in the commercial real estate, multi-family residential, and 1-to-4 family residential loan segments.

Total deposits in Idaho-chartered banks increased 9.3 percent from \$3.9 billion as of December 31, 2015, to \$4.3 billion as of December 31, 2016. Bank deposits nationwide increased 5.8 percent from \$12.2 trillion to \$12.9 trillion over the same period.

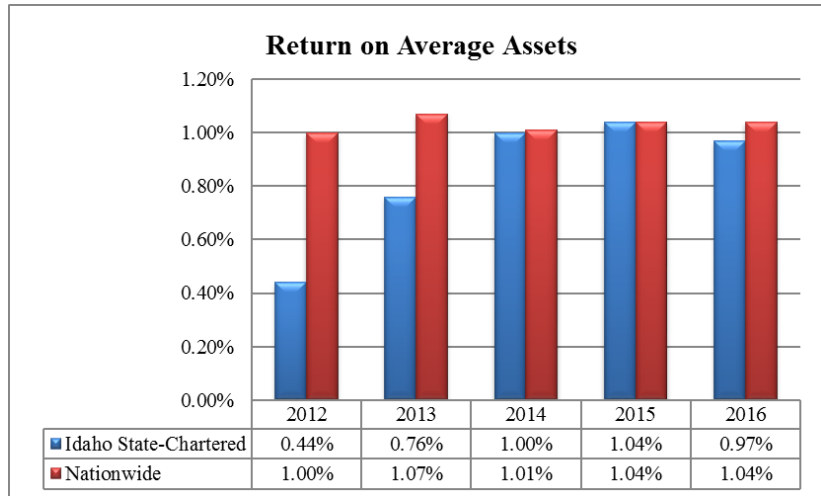
Asset Quality and Earnings in Idaho State-Chartered Banks

Overall, asset quality at Idaho-chartered banks was relatively stable in 2016. The ratio of net charge-offs to total loans for Idaho-chartered banks increased 2 basis points to 0.07 percent in 2016. Nationwide, banks experienced a slight increase in net charge-offs during 2016 as the ratio of net charge-offs to total loans increased from 0.44 percent to 0.47 percent. The ratio of noncurrent loans to total loans for Idaho-chartered banks



declined 1 basis point in 2015, falling to 0.45 percent, which was well below the national average of 1.46 percent. Idaho state-chartered banks reported a ratio of reserves for possible loan losses to total loans of 1.53 percent, which was greater than the 1.31 percent average reported for banks nationwide.

Earnings for both Idaho-chartered banks and banks nationwide increased in 2016. Net income for Idaho-chartered banks increased \$718 thousand, or 1.5 percent, from \$46.6 million to \$47.3 million. The Return on Average Assets ratio (ROAA) for Idaho-chartered banks declined from 1.04 to 0.97 percent due to asset growth outpacing earnings growth. All banks in the nation reported a 4.5 percent increase in net income from \$163.4 billion to \$170.8 billion, but the ROAA remained unchanged at 1.04 percent. Improved yields on earning assets resulted in an increase in the net interest



margin (NIM) for Idaho-chartered banks, rising from 3.88 percent to 3.95 percent during 2016. Nationwide, the NIM increased 6 basis points to 3.13 percent during the same period.

**Idaho State-Chartered Commercial Banks
Aggregate Condition and Performance**

IDAHO BANKS	6/30/2017	6/30/2016	\$/# Change	% Change	12/31/2016	12/31/2015	\$/# Change	% Change
<i>(dollar figures in millions)</i>								
Number of institutions reporting	12	11	1	9.09	11	11	0	0
Total employees (full-time equivalent)	1,310	1,223	87	7.11	1,264	1,192	72	6.04
AGGREGATE CONDITION AND INCOME DATA (\$000)								
Net operating income (year-to-date)	25,160	23,695	1,465	6.18	47,316	46,598	718	1.54
Total assets	5,281,111	4,733,408	547,703	11.57	5,062,040	4,635,672	426,368	9.20
Earning assets	4,943,381	4,417,021	526,360	11.92	4,724,962	4,317,832	407,130	9.43
Net loans & leases	3,354,969	2,982,048	342,921	12.51	3,150,974	2,787,627	363,347	13.03
Other real estate owned	15,026	20,075	(5,049)	(25.15)	16,874	23,638	(6,764)	(28.61)
Total deposits	4,485,429	3,943,900	4,485,429	13.73	4,260,193	3,896,989	363,204	9.32
Equity capital	613,273	582,417	613,273	5.30	593,159	564,174	28,985	5.14
	BP Change				BP Change			
Yield on earning assets	4.20%	4.16%	4		4.18%	4.10%	8	
Cost of funding earning assets	0.22%	0.21%	1		0.21%	0.22%	-1	
Net interest margin	3.98%	3.96%	2		3.97%	3.88%	9	
Noninterest income to average assets	0.79%	0.83%	-4		0.85%	0.80%	5	
Noninterest expense to average assets	3.03%	3.05%	-2		3.13%	3.10%	3	
Net charge-offs to loans & leases	-0.02%	0.10%	-12		0.08%	0.05%	3	
Credit-loss prov. to net charge-offs	-741.75%	119.75%	-86150		170.00%	93.72%	7628	
Net operating income to assets	0.97%	1.00%	-3		0.97%	1.02%	-5	
Retained earnings to average equity	5.08%	4.25%	83		5.04%	7.27%	-223	
Pre tax return on assets	1.41%	1.41%	0		1.36%	1.32%	4	
Return on assets	0.98%	1.02%	-4		0.98%	1.04%	-6	
Return on equity	8.37%	8.29%	8		8.06%	8.55%	-49	
Loss allowance to loans	1.51%	1.55%	-4		1.53%	1.65%	-12	
Loss allowance to noncurrent loans	181.76%	301.77%	-12001		341.61%	358.55%	-1694	
Noncurrent assets plus OREO to assets	0.82%	0.75%	7		0.62%	0.79%	-17	
Noncurrent loans to loans	0.83%	0.51%	32		0.45%	0.46%	-1	
Net loans and leases to deposits	74.80%	75.61%	-81		74.41%	71.53%	288	
Net loans and leases to core deposits	80.10%	79.82%	28		79.00%	75.58%	342	
Equity capital to assets	11.61%	12.30%	-69		11.81%	12.17%	-36	
Core capital (leverage) ratio	11.51%	11.96%	-45		11.74%	11.85%	-11	
Tier 1 risk-based capital ratio	15.29%	15.79%	-50		15.53%	16.30%	-77	
Total risk-based capital ratio	16.41%	16.89%	-48		16.64%	17.44%	-80	

TRUST DEPARTMENTS AND TRUST COMPANIES

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

Total trust assets under supervision increased by 0.16 percent during the year to \$463.4 million as of December 31, 2016, and consisted of \$382.2 million in managed assets and \$81.2 million in non-managed assets.

In addition to trust services offered by banks, two non-depository trust companies have received Department approval to operate in Idaho. Columbia Trust Company, a subsidiary of Columbia Banking Systems, Inc., operates a trust office in Coeur d'Alene. Northwest Trustee & Management Services, LLC, a Washington state-chartered trust company, operates a 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.

Trust Departments and Trust Companies				
Activity	12/31/2016	12/31/2015	\$/# Change	% Change
	(\$ in 000's)	(\$ in 000's)		
Fiduciary powers granted	5	5	0	0.00
Fiduciary powers exercised	3	3	0	0.00
Fiduciary or related activity	3	3	0	0.00
Number of fiduciary and related asset accounts	1,281	1,127	101	8.56
Number of managed accounts	1,032	903	65	6.72
Number of non-managed accounts	249	224	36	16.90
Total fiduciary and related assets (\$)	463,353	455,779	753	0.16
Managed assets (\$)	382,188	388,184	30,046	8.53
Non-managed assets (\$)	81,165	67,595	-29,293	-26.52

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 1,399 permanent jobs in the state. The Idaho Company, located in Idaho Falls, is the only licensed BIDCO in Idaho and was inactive in 2016.

Business and Industrial Development Corporations		
Activity for Calendar Year 2016	Number	Dollar Amount
Number and dollar amount of financing assistance provided to business firms:	0	\$0
Number and dollar amount of financing assistance provided to minority-owned and woman-owned business firms:	0	\$0
Estimated number of jobs created or retained through financing assistance:	0	NA
Activity Since Inception	Number	Dollar Amount
Number and dollar amount of financing assistance provided to business firms:	302	\$26,209,484
Number and dollar amount of financing assistance provided to minority-owned and woman-owned business firms:	30	\$2,057,916
Estimated number of jobs created:	1,025	NA
Estimated number of jobs retained:	374	NA

CREDIT UNION SECTION

The Credit Union Section is responsible for supervising all Idaho state-chartered credit unions and ensuring compliance with the Idaho Credit Union Act. As of June 30, 2017, there were 23 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 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, Hayden and Post Falls; and Spokane Teachers Credit Union has branches in Coeur d'Alene, Dalton Gardens, Ponderay, and Post Falls. California-chartered Silverado Credit Union operates one branch in Nampa.

The Credit Union section is an active participant in the National Association of State Credit Union Supervisors (NASCUS). NASCUS 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 2015, the Credit Union Section was successfully reaccredited by NASCUS for another five-year term.

In fiscal year 2017, the Credit Union Section completed 20 examinations and 3 visitations. Additionally, the Credit Union Section participated in one host-state examination and participated in the examination of American Share Insurance Corporation (ASI). Eleven of the examinations and two of the visitations were conducted jointly with examiners from either the NCUA or ASI, depending on whether the institution is federally or non-federally insured.

New Branches

During fiscal year 2017, a total of seven new branches were established by Idaho state-chartered credit unions. Idaho Central Credit Union opened new branches in Caldwell, on August 8, 2016, and in Post Falls, on November 7, 2016. Freedom Northwest Credit Union opened new branches in Lewiston, on February 6, 2017, and in Hayden, on April 24, 2017. Westmark Credit Union opened new branches in Idaho Falls, on August 11, 2016, and April 3, 2017. Lewis Clark Credit Union opened a new branch in Pomeroy, Washington on July 5, 2016.

Branch Closures

Icon Credit Union closed a Boise branch, located on Cole Road, effective December 30, 2016.

Branch Relocations

Clarity Credit Union relocated its Emmett branch from 111 South Hayes Avenue to 415 South Washington Avenue, effective August 9, 2016.

Mergers

Effective August 31, 2016, Jefferson County Public Employees Credit Union merged into Connections Credit Union. Effective October 1, 2016, Clearwater Credit Union merged into Lewis Clark Credit Union; Lewis Clark Credit Union continues to operate the one branch office acquired from Clearwater Credit Union, located in Lewiston.

Conversions

Latah Credit Union converted from a federally-chartered credit union to a state-chartered credit union, effective September 15, 2016. Latah Credit Union is headquartered in Moscow, and has four branches located in Moscow, Kendrick, Plummer, and Potlatch.

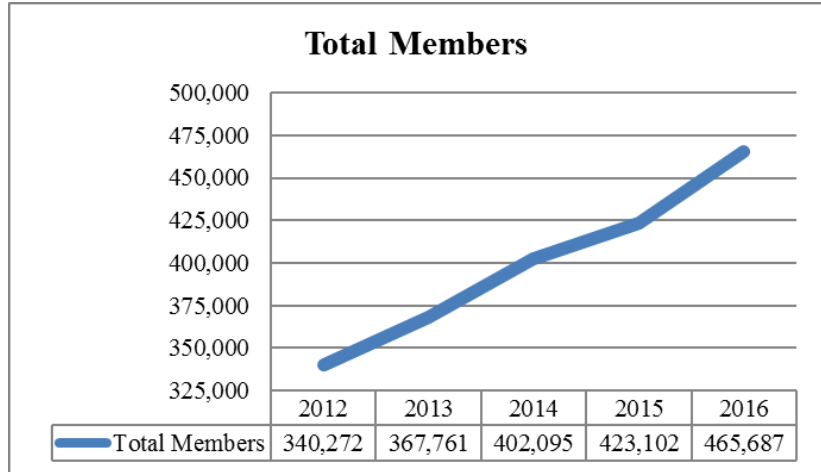
Performance and Condition of Idaho Credit Unions

Idaho state-chartered credit unions exhibited strong financial performance in calendar year 2016. This strong performance occurred despite the increased competitive landscape in the banking and financial technology areas, and in spite of the multi-year low interest rate environment that has compressed the net interest margins of Idaho state-chartered credit unions to historically low levels. As compared to the prior year, Idaho state-chartered credit unions are demonstrating many favorable trends, such as increased earnings, stable asset quality and robust membership growth, as well as strong loan and deposit growth.

Earnings, as measured by the Return on Average Assets ratio, increased 11 basis points in 2016 as compared to 2015. The Delinquent Loans to Total Loans ratio, a key evaluation factor for asset quality, increased slightly by 6 basis points. Another important determinant of asset quality is the Net Charge-Offs to Average Loans ratio, which remained nearly unchanged at 0.25 percent, as compared to 0.22 percent as of year-end 2015. Idaho state-chartered credit unions increased their net worth by 17.18 percent; net worth growth outpaced asset growth of 14.03 percent, allowing for the augmentation of the Net Worth ratio by 25 basis points to 9.33 percent. The information used to compile the dollar amounts and ratios in the below charts and narrative comments was derived from the consolidated Call Reports filed by Idaho's state-chartered credit unions for the period ending December 31, 2016.

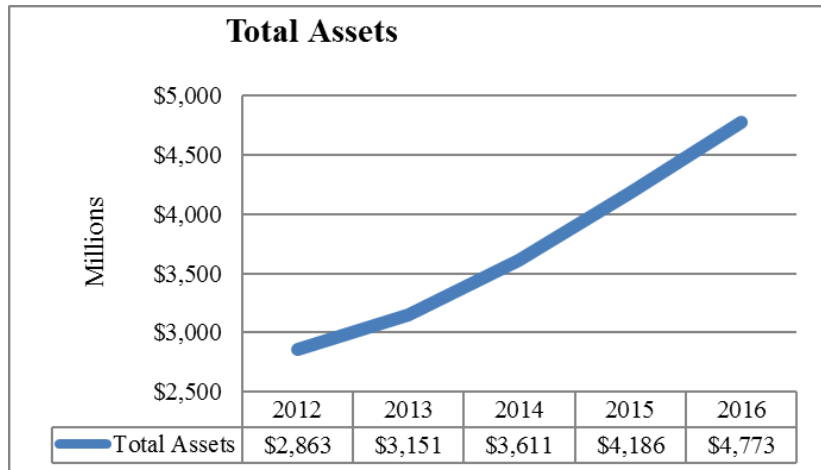
Members

Membership at Idaho state-chartered credit unions totaled nearly 466,000 members as of year-end 2016. Total membership increased by about 43,000 in the last 12 months, representing a 10.06 percent annual growth rate. Nationally, credit unions increased their membership at an annual rate of 4.08 percent.



Assets

Idaho state-chartered credit unions finished calendar year 2016 with total assets of \$4.77 billion, an increase of \$587 million from 2015. This represents an annual growth rate of 14.03 percent and continues the multi-year double-digit annual asset growth experience by Idaho state-chartered credit unions when measured as an average of aggregate growth. Nationally, credit unions experienced asset growth at an annual rate of 7.37 percent.



Loans

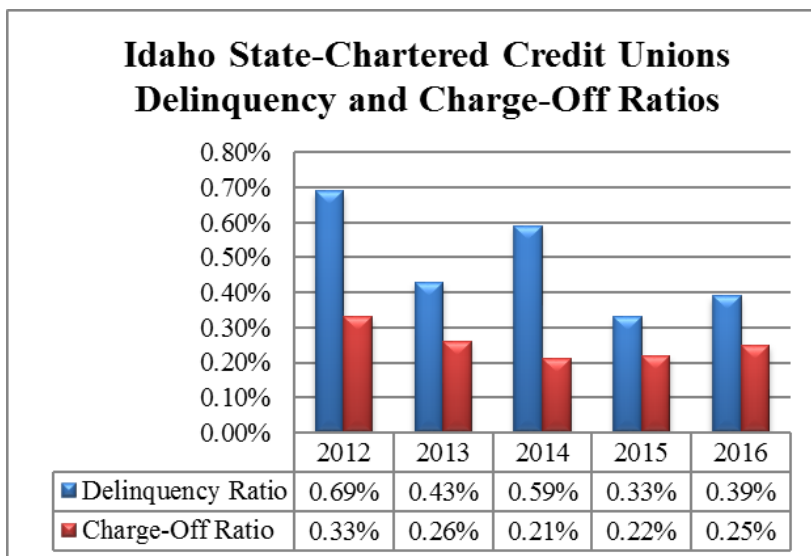
Idaho state-chartered credit unions granted \$3.59 billion in loans in 2016, marking a 29.28 percent increase over the prior year. On the balance sheet, Idaho state-chartered credit unions increased total loans by \$527.92 million in calendar year 2016, providing for an annual growth rate of 14.99 percent. This level of growth is significantly higher than the national credit union loan growth rate of 10.46 percent. The low interest rate environment combined with an increasingly competitive loan market, while beneficial for consumers, continues to place downward pressure on the loan yield earned by Idaho state-chartered credit unions. This is evidenced by the yield on average loans of 3.81 percent reported by Idaho state-chartered credit unions as of December 31, 2015. However, calendar year 2016 marks the first year, following a multi-year decline, with an increase in the yield on average loans, up 11 basis points to 3.81 percent from 3.70 percent as of year-end

2016. The downward trend for yield on average loans continued for credit unions nationwide, with an 8 basis point decline to 4.56 percent from 4.64 percent as of year-end 2015.

The composition of the \$4.05 billion Idaho state-chartered credit union loan portfolio is as follows: 40.28 percent in real estate-secured loans, 25.51 percent in used vehicle loans, 17.90 percent in new vehicle loans, 5.95 percent in unsecured credit card loans and other types of unsecured credit, and 10.35 percent in all other secured loans. Idaho state-chartered credit unions experienced strong loan growth in the real estate category, at 21.64 percent, as well as new vehicle loans at 16.63 percent, unsecured credit cards and other unsecured credit at 19.88 percent, and all other secured loans at 49.64 percent; Idaho state-chartered credit unions experienced a decrease in used vehicle loans at negative 4.15 percent. Credit unions are increasingly utilizing indirect lending relationships to generate new loans; total outstanding indirect loans increased by \$113.50 million, or 8.58 percent, in 2016. Indirect loans now represent 35.46 percent of total loans at Idaho state-chartered credit unions as of December 31, 2016.

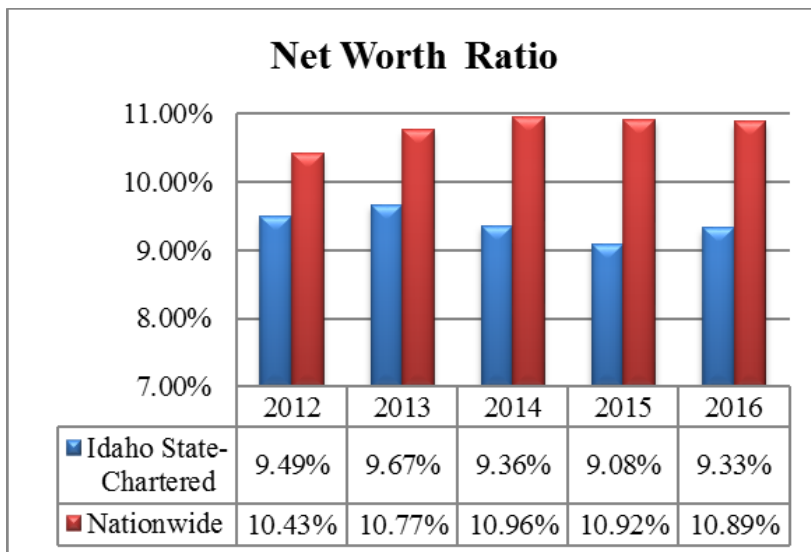
Delinquency and Charge-Offs

As a percentage of total loans, reportable loan delinquency increased to 0.39 percent as of December 31, 2016, up from 0.33 percent as of year-end 2015. One cause for the rise in delinquency is the increase in past due used vehicle loans, as a percentage of all used vehicle loans, from 0.50 percent as of December 31, 2015, to 0.67 percent as of December 31, 2016. The Net Charge-Offs to Average Loans ratio also increased slightly to 0.25 percent as of December 31, 2016, up from 0.22 percent as of year-end 2015. Nationwide, the Delinquent Loans ratio increased 2 basis points to 0.83 percent, and the Net Charge-Offs to Average Loans ratio increased 7 basis points, to 0.55 percent.



Net Worth

The Net Worth to Total Assets ratio (Net Worth ratio) increased from 9.08 percent to 9.33 percent in 2016, marking the first year since 2013 with an increase in the Net Worth ratio. Total Net Worth dollars increased by \$65.33 million, or 17.18 percent, to \$445.70 million. The growth of the Net Worth ratio is attributed to asset growth of 14.03 percent being outpaced by Net Worth growth of 17.18 percent. Idaho state-chartered credit unions continue to trail the national credit union Net Worth ratio average of 10.89 percent.

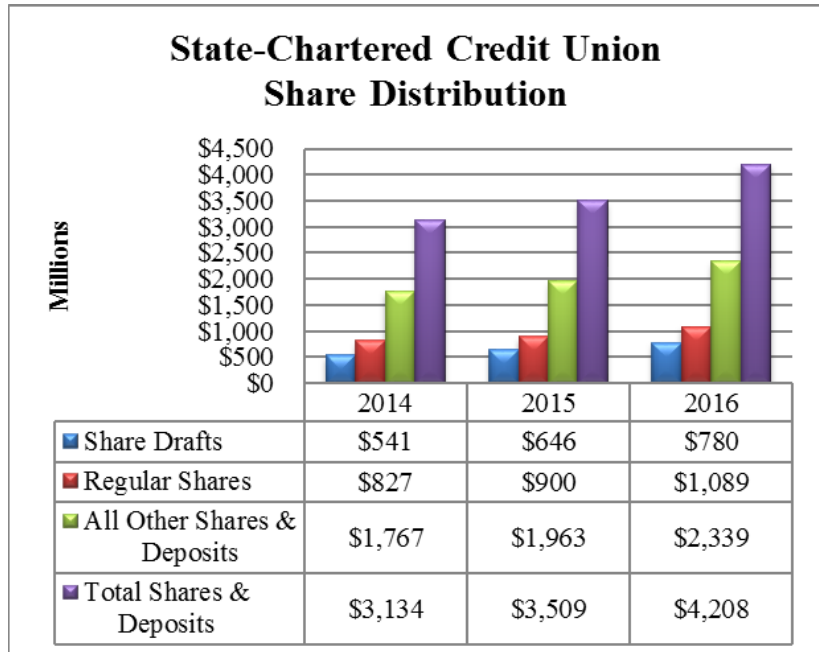


Operating Results

Idaho state-chartered credit unions earned an aggregate \$58.30 million in net income in 2016, an increase of \$12.08 million, or 26.15 percent, from 2015 earnings of \$46.22 million. The Return on Average Assets ratio (ROAA) of 1.30 percent compares very favorably to the ROAA of 0.76 percent reported by all credit unions nationwide for 2016. As discussed above, the continued low interest rate environment combined with a competitive marketplace for loan financing has placed continued compression on financial institutions' operating margins. However, for the first time since year-end 2007, Idaho state-chartered credit unions have been able to increase yields on both loans and investments. The yield on average loans increased to 3.81 percent, up from 3.70 percent as of year-end 2015. The yield on average investments also increased to 1.21 percent, from 1.00 percent as of year-end 2015.

Deposits

In 2016, total shares and deposits increased by 19.92 percent to \$4.21 billion. Total share drafts increased by 20.70 percent to \$779.80 million; total regular shares increased at a similar rate, by 20.94 percent to \$1.09 billion. Regular shares represent 25.88 percent of total deposits, similar to the 25.66 percent level noted as of year-end 2015. Certificates of deposit continue to represent the largest portion of total shares and deposits at 29.71 percent, as compared to 30.21 percent as of year-end 2015. Money market shares grew by 10.87 percent, to \$673.59 million, while



IRA/KEOGH accounts grew by 11.62 percent to \$247.28 million. As a non-core source of funds, Idaho state-chartered credit unions report \$105.47 million in non-member deposits as of year-end 2016, marking an increase of 351.26 percent over year-end 2015.

Liquidity

Cash and cash equivalents increased by \$7.10 million, or 3.71 percent, to \$198.28 million as of December 31, 2016. Total investments less than one year, including cash on deposit and cash equivalents, increased by \$9.16 million, or 4.31 percent, from 2015. The Cash and Short-Term Investments to Total Assets (Liquidity) ratio of 5.51 percent represents a 57 basis point decrease from year-end 2015. Loans comprise 96.24 percent of total shares, down from 100.37 percent as of December 31, 2015. While loans as a percentage of shares have decreased, loans as a percentage of assets remained stable at 84.84 percent, similar to that of 84.13 percent as of year-end 2015. Total off-balance sheet borrowing capacity increased by \$57.58 million, or 5.68 percent, to \$1.07 billion as of December 31, 2016. Outstanding draws against borrowing lines of credit decreased by \$155.52 million, or 93.28 percent, from year-end 2015 to year-end 2016.

CONSUMER FINANCE BUREAU

Idaho Collection Agency Act
Idaho Credit Code
Idaho Residential Mortgage Practices Act
Idaho Financial Fraud Prevention Act

The Consumer Finance Bureau is the regulatory and licensing authority for regulated consumer 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 in Idaho 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 in Idaho are also required to obtain a license and comply with the provisions of the Act.

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, made by an authorized lender.

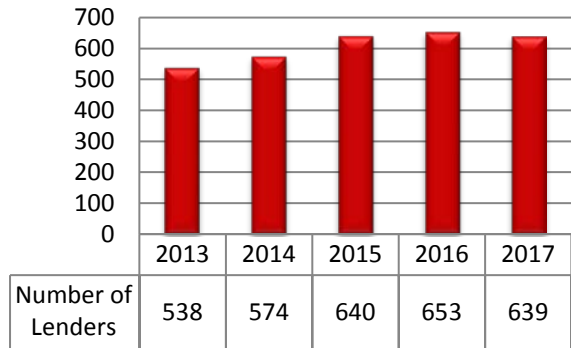
Compliance with the above laws is reviewed through examinations of licensees and by investigations of complaints filed with the Consumer Finance Bureau. The goal of the Bureau is to assure the availability and quality of consumer financial services and lawful debt collection practices. The Consumer Finance Bureau currently has a 23 member staff.

IDAHO CREDIT CODE

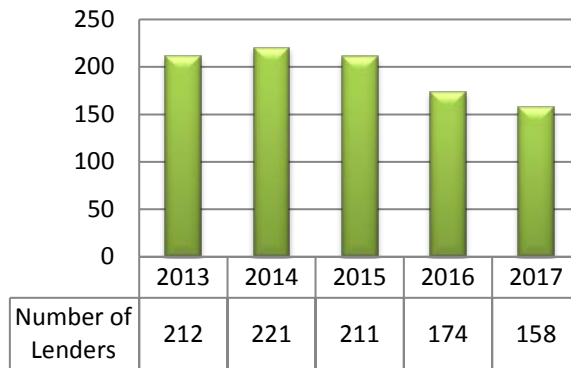
The *Idaho Credit Code* (ICC) is a state law that regulates specific terms and conditions of consumer credit in Idaho. A consumer credit transaction is a credit sale or loan in which the credit or loan is extended by a person who is regularly engaged in the offering of credit or financing to borrowers 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 consumer protection 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, the right, once per year, to an extended payment plan to pay off a payday loan, and the right to cancel certain home solicitation sales and real estate transactions.

Idaho Regulated Lenders-Including Title Lenders and Assignees



Idaho Payday Lenders



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 reports annually.

During fiscal year 2017, lending activity by state licensed regulated lenders ranged from sole-proprietors located in Idaho to national finance companies with several million 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, 2017, there were 639 regulated lender office locations licensed under the ICC, which included title lenders, consumer loan assignees, and consumer finance companies. Additionally, as of June 30, 2017, there were 158 payday lender office locations licensed under the ICC.

Compliance/Enforcement – In addition to answering consumer inquiries and complaints, Consumer Finance Bureau staff members conduct routine and “for-cause” on-site compliance examinations of licensed regulated lenders. The Bureau is committed to regularly examining licensees to ensure that their business practices comply with the provisions of the ICC. During fiscal year 2017, the Bureau’s field examiners conducted eight examinations of payday lender offices, seven examinations of title loan offices, and 20 examinations of other regulated consumer 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 lending activity, including title loans, during a single examination. The Bureau also received and acted upon 46 complaints from Idaho consumers regarding entities operating as regulated lenders or title lenders, and five complaints against payday lenders. Additionally, the Department entered into an administrative Consent Order with one entity for engaging in consumer lending in Idaho without a license. Details of this action are included in Exhibit V.

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.

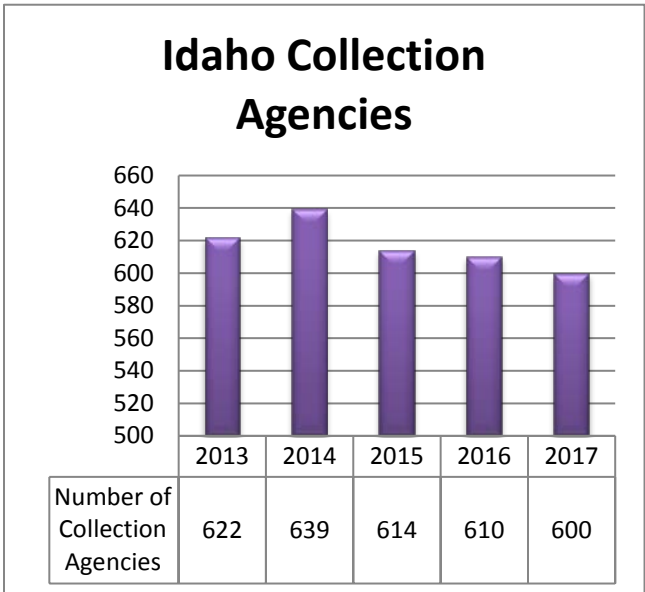
Licensing –It is unlawful under the Act for non-exempt entities to engage in the following activities in Idaho without first obtaining an Idaho collection agency license:

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

No matter where located, all non-exempt 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.

As of June 30, 2017, Idaho had 600 Idaho collection agency licensees. These agencies had a combined total of 57,704 individual solicitors/collectors registered with the Department. Additionally, at fiscal year-end the Department had 37 credit/debt counselors, six credit repair organizations, and 70 debt buyers licensed under the Act.



Compliance/Enforcement – In addition to answering consumer inquiries and complaints, Bureau examiners regularly conduct on-site compliance examinations of licensed collection agencies. During the past fiscal year, Bureau examiners conducted 10 examinations of companies licensed under the Act. The Department received 64 complaints against collection agencies and debt buyers and nine complaints against credit/debt counselors. The Department entered into four Consent Orders to resolve allegations of violations of the Act. Additionally, the Department entered into a Consent Order with one entity, addressing its act of operating a credit repair business in Idaho without a license, and issued Cease and Desist Orders against three collection agencies for violations of the Act. Details of these actions are included in Exhibit V.

**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 in Idaho meet minimum standards and that consumers are protected against unfair practices.

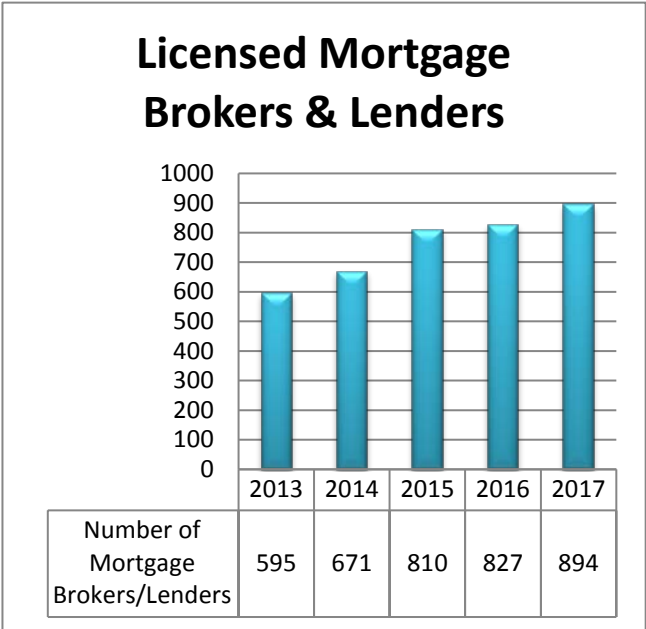
Mortgage brokers are companies in the business of:

- (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 in 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(w) of the Truth in Lending Act (15 USC 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/lenders obtain a license for each location from which they conduct mortgage brokering/lending activities in Idaho. Licensees are not required to have a physical office location in Idaho. In fact, the Department has license holders nationwide. As of June 30, 2017, the Department had 894 active mortgage broker/lender licenses in effect. The Department also had 4,241 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 2017, the Department conducted examinations of 57 licensed mortgage broker/lender companies, which included a review of the activities of approximately 384 mortgage loan originators for compliance with the Act. The Bureau also handles customer complaints and inquiries. During fiscal year 2017, the Department received and processed 35 complaints against mortgage service providers, 19 complaints against mortgage brokers/lenders, and one complaint against an individual mortgage loan originator.

Enforcement – In fiscal year 2017, the Department issued administrative orders denying two mortgage loan originator license applications for failure to meet statutory requirements for licensure. Additionally, the Department entered into separate Consent Orders with two mortgage loan originators and one mortgage broker/lender, addressing violations of the Act. The Department also issued a Cease and Desist Order against one mortgage broker/lender for violations of the Act. Details of these actions are included in Exhibit V.

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. The Department often receives inquiries from consumers contemplating paying upfront fees to loan brokers. In response to these inquiries, and in financial literacy trainings throughout the state, Bureau staff members regularly warn Idaho consumers 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, and rarely recover their funds.

REGULATORY AND EDUCATIONAL INITIATIVES

Mortgage Advisory Board – Pursuant to the provisions of the Idaho Residential Mortgage Practices Act, the Director appoints Idaho mortgage industry members to a Mortgage Advisory Board annually. The Mortgage Advisory Board meets throughout the year with the Department Director and Bureau staff members and provides valuable input on mortgage regulatory issues, market conditions, and industry initiatives. Through fiscal year 2017, the members of the Mortgage Advisory Board, who also represent mortgage industry associations in Idaho, provided the Department with vital information and feedback relative to the Department’s oversight of the mortgage industry in Idaho. The current members of the Mortgage Advisory Board are Chuck Anderson, Ty Porter, Michelle Guth, and Leah Marchbanks.

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 Idaho’s adoption of requirements of the federal Secure and Fair Enforcement for Mortgage Licensing Act (SAFE Act). This includes participation by Bureau staff members on various committees to develop procedural standards for licensing, including licensee testing, and continuing education implemented through the Nationwide Multistate Licensing System (NMLS). Throughout fiscal year 2017 Bureau staff members were in communication with the federal Consumer Financial Protection Bureau (CFPB), the federal agency with oversight responsibility to ensure the effective administration of the SAFE Act in Idaho.

Mortgage Recovery Fund – Idaho law establishes a mortgage recovery fund to provide reimbursement to persons damaged as a result 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 2017 the mortgage recovery fund balance was \$2,220,599.06. As a consequence of attaining a fund balance in excess of \$1,500,000 by fiscal year end, the Department notified its mortgage licensees, pursuant to Idaho Code § 26-31-110(2), of a mortgage recovery fund “fee holiday” for the 2017 mortgage license renewal process.

SECURITIES BUREAU

Business Combination Act
Continuing Care Disclosure Act
Control Share Acquisition Act
Endowment Care Cemetery Act
Idaho Commodity Code
Idaho Escrow Act
Idaho Financial Fraud Prevention Act
Idaho Money Transmitters Act
Uniform Securities 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. Through the *Idaho Escrow Act*, the Bureau provides oversight to independent escrow companies, as well as those providing 1031 exchange accommodation services.

The Bureau has limited duties under Idaho's *Control Share Acquisition Act*, *Business Combination Act*, *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, stored value products).

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

UNIFORM SECURITIES ACT

The *Uniform Securities Act* (Act) seeks to preserve and promote legitimate securities markets by assisting companies in their attempts to raise capital and prevent investment fraud. While the Act is designed to protect investors from fraud, it does not protect investors from the possibility of investment loss resulting from securities price movements, market changes or business failures. The Act requires that persons who solicit investments provide complete disclosure of all the important aspects of the investment being promoted. With this information, investors are empowered to make reasoned investment decisions.

Idaho Registered Broker-Dealers and Investment Advisers

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

Registration of Firms and Agents – The Bureau registers and provides oversight for most broker-dealers, securities sales agents and investment adviser representatives doing business in or from Idaho. Additionally, the Bureau registers and is the sole regulator for investment adviser firms located in Idaho that have assets under management of up to \$100 million. Every application for registration is examined either electronically or manually prior to approval. The Bureau had oversight responsibility for 1,462 broker-dealer firms and state registered investment adviser firms during fiscal year 2017. This oversight also extends to the nearly 114,000 individuals who currently hold Idaho registrations as broker-dealer agents, investment adviser representatives, and issuer agents. While the aggregate number of broker-dealer firms has been somewhat static in recent years, the number of agents has continued to climb to another all-time high this fiscal year.

Compliance – In an effort to assure that the securities industry is complying with the 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 exceeded \$16 million. During fiscal year 2017, the Securities Bureau initiated or completed 13 formal enforcement actions. Details of the administrative and civil court actions filed or completed by the Bureau during fiscal year 2017 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, more than \$800,000 in refunds on their securities investments due to the administrative and civil enforcement actions described earlier. This 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 \$300,000 in fiscal year 2017.

IDAHO MONEY TRANSMITTERS

The Department of Finance is charged with the responsibility of administering and enforcing the *Idaho Money Transmitters 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 of 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 102 licensees under this statute and the Bureau initiated one enforcement action for unlicensed activity. The number of money transmitter licensees has doubled since Fiscal Year 2010 as a result of new business models including Internet-only transmitters, stored value instruments, crypto-currencies and blockchain payment technologies, as well as other “fintech” payment-related entities.

IDAHO ESCROW ACT

The *Idaho Escrow Act* assigns the Department regulatory oversight responsibilities for 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, 2017, the Department had 35 licensees authorized to engage in escrow activities in the state of Idaho.

ENDOWMENT CARE CEMETERIES

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 cemeteries are followed. 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. 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. All “endowed care” or “perpetual care” cemeteries in Idaho are required to be registered with the Securities Bureau.

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.

SUPPORTING SERVICES BUREAU

This Bureau provides enterprise operational support to the Director and the other Bureau Chiefs 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 Department's vehicles, and maintenance of the Department's information technology systems.

The Supporting Services Bureau completed several large projects during fiscal year 2017 including: improvement upgrades on a web-based licensing system for collection agents, IT, fiscal and budgetary support for national accreditations, replacement of key equipment, updating the 2018 – 2023 Department Strategic Plan, the Strategic IT Plan, Emergency Operations Plan, and overseeing increased design and continued transition into a comprehensive records management system. Databases for Mortgage Loan Originators, Mortgage Loan Originator Continuing Education, and CFB Case Management, all received major upgrades. The Bureau also worked with Access Idaho and the Nationwide Multistate Licensing System (NMLS) to improve automated licensing of collection agencies, as well as solicitors and collectors. Many systems received significant synchronization capabilities and other upgrades during fiscal year 2017.

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

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

<u>Director/Commissioner</u>	<u>Term of Office</u>
Charles S. Loveland	March 6, 1905 to June 1, 1907
W. S. Chaney	June 1, 1907 to March 6, 1909
William G. Cruse	March 6, 1909 to June 2, 1911
V. W. Platt	June 2, 1911 to February 1, 1913
A. E. Reid	February 1, 1913 to February 6, 1915
G. R. Hitt	February 6, 1915 to January 25, 1919
Jay Gibson	January 25, 1919 to September 10, 1920
J. G. Fralick	September 10, 1920 to February 7, 1923
E. W. Porter	February 7, 1923 to February 1, 1931
Ben Diefendorf	February 1, 1931 to January 13, 1937
George W. Wedgwood	January 13, 1937 to January 1, 1939
G. L. Jenkins	January 1, 1939 to January 6, 1941
George W. Wedgwood	January 6, 1941 to January 4, 1943
G. L. Jenkins	January 4, 1943 to January 2, 1945
J. B. Newport	January 4, 1945 to December 28, 1946
William J. Sewell	December 28, 1946 to January 6, 1947
E. F. Haworth	January 6, 1947 to August 15, 1952
Austin Schauweiler	August 15, 1952 to May 14, 1954
R. U. Spaulding	June 17, 1954 to April 14, 1961
J. L. McCarthy	June 1, 1961 to July 9, 1965
Tom D. McEldowney (Acting)	August 10, 1965 to January 31, 1967
John D. Silva	February 1, 1967 to January 4, 1971
Tom D. McEldowney (Acting)	January 4, 1971 to August 29, 1971
Tom D. McEldowney	August 30, 1971 to March 31, 1987
Belton J. Patty	April 1, 1987 to January 1, 1995
Gavin M. Gee (Acting)	January 2, 1995 to March 13, 1996
Gavin M. Gee	March 13, 1996 to January 26, 2017
Mary E. Hughes (Acting).....	January 27, 2017 to November 4, 2017
Gavin M. Gee.....	November 5, 2017 to Present

SUMMARY OF INCOME AND EXPENSES

July 1, 2016 through June 30, 2017

INCOME BY SOURCE

Dedicated Account-----	\$13,210,430
TOTAL INCOME COLLECTED-----	\$13,210,430

APPROPRIATION

Dedicated Account-----	\$8,070,300
TOTAL APPROPRIATION-----	\$8,070,300

EXPENDITURES

Personnel Costs-----	\$5,988,709
Operating Expenditures-----	\$1,649,504
Capital Outlay-----	\$73,500
TOTAL EXPENDITURES-----	\$7,711,713
BALANCE OF APPROPRIATION-----	\$358,587

EXPENDITURES BY MAJOR CLASSES

Salaries & Wages-----	\$4,313,464
Personnel Benefits-----	\$1,675,246
Communication Services-----	\$48,495
Employee Development & Other Services-----	\$138,353
Professional Services-----	\$477,185
Repairs & Maintenance Service-----	\$71,357
Administrative Services-----	\$2,123
DP Services-----	\$129,731
Employee Travel-----	\$334,941
Materials & Supplies-----	\$47,379
Insurance-----	\$2,721
Rentals & Operating Leases-----	\$367,069
Miscellaneous Operating Expenditures-----	\$30,149
Capital Outlay-----	\$73,500
	\$7,711,713

TRANSFERRED TO GENERAL FUND -----\$5,266,734

PERSONNEL STATUS June 30	POSITIONS AUTHORIZED	POSITIONS APPROPRIATED	POSITIONS FILLED
Full-Time Employees	66	66	63

FUND SOURCE B

Security Investor Fund (Securities Fines Only)-----	<u>\$50,000.00</u>
	<u>\$50,000.00</u>

EXPENDITURES

Personnel Costs-----	\$0
Operating Expenditures-----	\$29,383
Capital Outlay-----	<u>\$0</u>
	<u>\$29,383</u>
Balance-----	<u>\$20,617</u>

FUND SOURCE C

Mortgage Recovery Fund-----	<u>\$2,220,599</u>
TOTAL COLLECTED -----	<u>\$2,220,599</u>

STATE OF IDAHO
STATE-CHARTERED BANKS AND SAVINGS BANKS*
COMPARATIVE STATEMENT
Close of Business 12/31/16 and 12/31/15
(000's Omitted)

	2016	2015	\$ Change
Cash and balances due from depository institutions			
Noninterest-bearing balances and currency and coin	96,240	85,964	10,276
Interest-bearing balances	504,046	499,815	4,231
Securities:			
Held-to-maturity securities	150,904	154,111	(3,207)
Available-for-sale securities	800,869	808,497	(7,628)
Federal funds sold and securities purchased under agreements to resell			
Federal funds sold	68,030	64,095	3,935
Securities purchased under agreements to resell			
Loans and lease financing receivables			
Loans and leases held for sale	25,041	29,614	(4,573)
Loans and leases, net of unearned income	3,124,945	2,804,700	320,245
LESS: Allowance for loan and lease losses	48,288	46,687	1,601
Loans and leases, net of unearned income and allowance	3,076,657	2,758,013	318,644
Trading assets	3,776		3,776
Premises and fixed assets (including capitalized leases)	102,024	101,906	118
Other real estate owned	16,536	23,638	(7,102)
Investments in unconsolidated subsidiaries and associated companies			
Intangible assets:			
Goodwill	419	419	
Other intangible assets	1,767	1,934	(167)
Other assets	116,265	103,979	12,286
Total assets	<u>4,963,099</u>	<u>4,635,672</u>	<u>327,427</u>
Deposits:			
In domestic offices:			
Noninterest-bearing	4,168,462	3,896,989	271,473
Interest-bearing	1,450,356	1,339,435	110,921
Interest-bearing	2,718,106	2,557,554	160,552
Federal funds purchased and securities sold under agreements to repurchase			
Federal funds purchased			
Securities sold under agreements to repurchase	133,970	123,783	10,187
Trading liabilities	3,776		3,776
Other borrowed money	42,040	22,314	19,726
Bank's liability on acceptances executed and outstanding			
Subordinated notes and debentures			
Other liabilities	28,818	24,725	4,093
Total liabilities	<u>4,377,066</u>	<u>4,071,498</u>	<u>305,568</u>
Minority interest in consolidated subsidiaries			
Perpetual preferred stock and related surplus			
Common stock	91,391	88,656	2,735
Surplus (exclude all surplus related to preferred stock)	252,941	252,713	228
Retained earnings and Other Equity Capital Components	241,701	222,805	18,896
Total equity capital	<u>586,033</u>	<u>564,174</u>	<u>21,859</u>
Total liabilities, minority interest, and equity capital	<u>4,963,099</u>	<u>4,635,672</u>	<u>327,427</u>

* Includes only state-chartered banks headquartered in Idaho as of 12/31/2016 and 12/31/2015

Source: Federal Deposit Insurance Corporation

DECEMBER 31, 2016
BANK OF IDAHO
IDAHO FALLS, IDAHO
Charter No. 240
Charter Issued September 13, 1985
Incorporated July 17, 1985

OFFICERS:

President & CEO: Jeffrey K. Newgard
Chief Financial Officer: Jeff Manser
Chief Credit Officer: Cam Payne
Chief Informatin Officer: Mike Bennett

DIRECTORS:

Emma L. Atchley; Steven E. Carr;
Mario Hernandez; Kenlon P. Johnson;
Jeffrey K. Newgard; Park Price; John Spicer

	(000's omitted)
Cash and balances due from depository institutions:	
Noninterest-bearing balances and currency and coin.	4,186
Interest-bearing balances	14,610
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	54,706
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	7,706
Loans and leases, net of unearned income	204,989
LESS: Allowance for loan and lease losses	3,543
Loans and leases, net of unearned income and allowance	201,446
Trading assets	0
Premises and fixed assets (including capitalized leases)	5,927
Other real estate owned	687
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	3,178
Total assets	292,446
Deposits:	
In domestic offices:	259,156
Noninterest-bearing	82,218
Interest-bearing	176,938
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	2,876
Total liabilities	262,032
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)	13,427
Retained earnings	15,627
Accumulated other comprehensive income	(42)
Other equity capital components	0
Total equity capital	30,414
Total liabilities, minority interest, and equity capital	292,446

DECEMBER 31, 2016
bankcda
COEUR D'ALENE, IDAHO
Charter No. 258
Charter Issued May 3, 2001
Incorporated October 16, 2000

OFFICERS:

President & CEO: Wes Veach
Chief Financial Officer: Ashley Lenz
Chief Credit Officer: Shelly Romine
Sr. Operations Officer: Kim Nordstrom

DIRECTORS:

Brad Corkill; William J. Haley;
Suzanne Metzger; C. Richard Nordstrom;
Robert Schmand; John C. Shovic;
Craig S. Tedmon; Wes Veach

Cash and balances due from depository institutions:	(000's omitted)
Noninterest-bearing balances and currency and coin.	2,344
Interest-bearing balances	7,022
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	18,108
Federal funds sold and securities purchased under agreements to resell:	
Federal funds sold	835
Securities purchased under agreements to resell	0
Loans and lease financing receivables:	
Loans and leases held for sale	0
Loans and leases, net of unearned income	70,035
LESS: Allowance for loan and lease losses	1,057
Loans and leases, net of unearned income and allowance	68,978
Trading assets	0
Premises and fixed assets (including capitalized leases)	4,907
Other real estate owned	0
Intangible assets:	
Goodwill	42
Other intangible assets	143
Other assets	3,682
Total assets	<u>106,061</u>
Deposits:	
In domestic offices:	93,335
Noninterest-bearing	26,034
Interest-bearing	67,301
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	2,548
Subordinated notes and debentures	0
Other liabilities	196
Total liabilities	<u>96,079</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	6,488
Surplus (exclude all surplus related to preferred stock)	1,840
Retained earnings	1,821
Accumulated other comprehensive income	(167)
Other equity capital components	143
Total equity capital	<u>9,982</u>
Total liabilities, minority interest, and equity capital	<u>106,061</u>

DECEMBER 31, 2016
COMMUNITY 1ST BANK
POST FALLS, IDAHO
Charter No. 261
Charter Issued May 21, 2007
Incorporated May 10, 2007

OFFICERS:

Chief Executive Officer: David P. Bobbitt
 President & Chief Operations Officer: Jerry C. Lyon
 Chief Financial Officer: Nicole M. Montgomery

DIRECTORS:

William R. Basom; David P. Bobbitt;
 W. Bill Booth; David B. Holloway;
 Cyndie J. Lempesis; 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.	901
Interest-bearing balances	17,625
Securities:	
Held-to-maturity securities	8,213
Available-for-sale securities	8,084
Federal funds sold and securities purchased under agreements to resell:	
Federal funds sold	201
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	66,438
LESS: Allowance for loan and lease losses	882
Loans and leases, net of unearned income and allowance	65,556
Trading assets	0
Premises and fixed assets (including capitalized leases)	2,316
Other real estate owned	0
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	541
Total assets	103,437
Deposits:	
In domestic offices:	91,526
Noninterest-bearing	23,397
Interest-bearing	68,129
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	181
Total liabilities	91,707
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	5,519
Surplus (exclude all surplus related to preferred stock)	5,656
Retained earnings	604
Accumulated other comprehensive income	(49)
Other equity capital components	0
Total equity capital	11,730
Total liabilities, minority interest, and equity capital	103,437

DECEMBER 31, 2016
D. L. EVANS BANK
BURLEY, IDAHO
Charter No. 26
Charter Issued August 29, 1904
Incorporated August 29, 1904

OFFICERS:

President & CEO: John V. Evans, Jr.
Chief Administrative Officer: Brenda Sanford
Chief Financial Officer: Curtis Smith
Chief Credit Officer: H. Scott Horsley

DIRECTORS:

David L. Evans, IV; Don S. Evans, Jr.; Don S. Evans, III;
John V. Evans, Jr.; Larry L. Evans;
Paula D. Evans; Susan D. Evans-Scarlett;
Martha E. Gilgen; Glen R. Kunau

Cash and balances due from depository institutions:	(000's omitted)
Noninterest-bearing balances and currency and coin.	28,002
Interest-bearing balances	90,141
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	292,011
Federal funds sold and securities purchased under agreements to resell:	
Federal funds sold	450
Securities purchased under agreements to resell	0
Loans and lease financing receivables:	
Loans and leases held for sale	6,146
Loans and leases, net of unearned income	828,981
LESS: Allowance for loan and lease losses	15,086
Loans and leases, net of unearned income and allowance	813,895
Trading assets	0
Premises and fixed assets (including capitalized leases)	46,194
Other real estate owned	10,296
Intangible assets:	
Goodwill	0
Other intangible assets	720
Other assets	34,425
Total assets	<u>1,322,280</u>
Deposits:	
In domestic offices:	1,092,420
Noninterest-bearing	397,141
Interest-bearing	695,279
Federal funds purchased and securities sold under agreements to repurchase:	
Federal funds purchased	0
Securities sold under agreements to repurchase	107,011
Trading liabilities	0
Other borrowed money	0
Subordinated notes and debentures	0
Other liabilities	5,357
Total liabilities	<u>1,204,788</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	901
Surplus (exclude all surplus related to preferred stock)	75,525
Retained earnings	41,143
Accumulated other comprehensive income	(77)
Other equity capital components	720
Total equity capital	<u>117,492</u>
Total liabilities, minority interest, and equity capital	<u><u>1,322,280</u></u>

DECEMBER 31, 2016
FARMERS BANK
BUHL, IDAHO
Charter No. 265
Charter Issued December 26, 2014
Incorporated December 23, 2014

OFFICERS:

President: Mike Hamilton
Chief Operations Officer: Lee Cline
Chief Information Officer: Pat Hamilton
Chief Financial Officer: Darcie Upton

DIRECTORS:

John Gibson; Mike Hamilton;
Pat Hamilton; Vince Hamilton;
Walter C. Nelson; Jay L. Nielsen;

Cash and balances due from depository institutions:	(000's omitted)
Noninterest-bearing balances and currency and coin.	11,881
Interest-bearing balances	1,117
Securities:	
Held-to-maturity securities	44,160
Available-for-sale securities	193,659
Federal funds sold and securities purchased under agreements to resell:	
Federal funds sold	384
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	189,998
LESS: Allowance for loan and lease losses	6,158
Loans and leases, net of unearned income and allowance	183,840
Trading assets	0
Premises and fixed assets (including capitalized leases)	884
Other real estate owned	46
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	7,615
Total assets	<u>443,586</u>
Deposits:	
In domestic offices:	379,528
Noninterest-bearing	97,583
Interest-bearing	281,945
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	1,250
Total liabilities	<u>380,778</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	2,000
Surplus (exclude all surplus related to preferred stock)	12,174
Retained earnings	49,037
Accumulated other comprehensive income	(403)
Other equity capital components	0
Total equity capital	<u>62,808</u>
Total liabilities, minority interest, and equity capital	<u><u>443,586</u></u>

DECEMBER 31, 2016
IDAHO FIRST BANK
MCCALL, IDAHO
Charter No. 259
Charter Issued September 3, 2005
Incorporated March 3, 2005

OFFICERS:

President & CEO: P. Greg Lovell
Chief Financial Officer: Don D. Madsen
Chief Credit Officer: Kathleen Lewis

DIRECTORS:

James L. Fletcher; Daniel C. Krahn;
Larry LaRocco; P. Greg Lovell;
Mark J. Miller; William B. Rawlings;
Andrew J. Scoggin

Cash and balances due from depository institutions:	(000's omitted)
Noninterest-bearing balances and currency and coin.	3,808
Interest-bearing balances	6,751
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	9,733
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	2,622
Loans and leases, net of unearned income	118,008
LESS: Allowance for loan and lease losses	1,602
Loans and leases, net of unearned income and allowance	116,406
Trading assets	0
Premises and fixed assets (including capitalized leases)	4,916
Other real estate owned	0
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	5,254
Total assets	<u>149,490</u>
Deposits:	
In domestic offices:	129,460
Noninterest-bearing	27,562
Interest-bearing	101,898
Federal funds purchased and securities sold under agreements to repurchase:	
Federal funds purchased	0
Securities sold under agreements to repurchase	0
Trading liabilities	0
Other borrowed money	3,000
Subordinated notes and debentures	0
Other liabilities	430
Total liabilities	<u>132,890</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	21,911
Surplus (exclude all surplus related to preferred stock)	0
Retained earnings	(5,240)
Accumulated other comprehensive income	(71)
Other equity capital components	0
Total equity capital	<u>16,600</u>
Total liabilities, minority interest, and equity capital	<u>149,490</u>

DECEMBER 31, 2016
IDAHO INDEPENDENT BANK
COEUR D'ALENE, IDAHO
Charter No. 246
Charter Issued September 7, 1993
Incorporated November 3, 1992

OFFICERS:

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

DIRECTORS:

Richard D'Ambrosio; Roy L. Eiguren;
Jack W. Gustavel; Kurt R. Gustavel;
Jerald J. Jaeger; Alicia A. Ritter

Cash and balances due from depository institutions	(000's omitted)
Noninterest-bearing balances and currency and coin.	11,760
Interest-bearing balances	169,954
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	72,577
Federal funds sold and securities purchased under agreements to resell	
Federal funds sold	255
Securities purchased under agreements to resell	0
Loans and lease financing receivables	
Loans and leases held for sale	4,723
Loans and leases, net of unearned income	319,936
LESS: Allowance for loan and lease losses	6,124
Loans and leases, net of unearned income and allowance	313,812
Trading assets	3,776
Premises and fixed assets (including capitalized leases)	15,707
Other real estate owned	1,029
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	25,619
Total assets	<u>619,212</u>
Deposits:	
In domestic offices:	512,429
Noninterest-bearing	205,482
Interest-bearing	306,947
Federal funds purchased and securities sold under agreements to repurchase	
Federal funds purchased	0
Securities sold under agreements to repurchase	26,464
Trading liabilities	3,776
Other borrowed money	4,000
Subordinated notes and debentures	0
Other liabilities	8,464
Total liabilities	<u>555,133</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	44,965
Surplus (exclude all surplus related to preferred stock)	41,954
Retained earnings	(6,810)
Accumulated other comprehensive income	(144)
Other equity capital components	0
Total equity capital	<u>64,079</u>
Total liabilities, minority interest, and equity capital	<u><u>619,212</u></u>

DECEMBER 31, 2016
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: Ronnie Zivanic
Chief Credit Officer: James A. Kinshella

DIRECTORS:

Matthew J. Baker; John B. Dimmer;
Stanley K. Fornander; Richard H. Jones;
Daniel W. Prohaska; Thomas F. Prohaska

	(000's omitted)
Cash and balances due from depository institutions:	
Noninterest-bearing balances and currency and coin.	1,475
Interest-bearing balances	18,893
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	871
Federal funds sold and securities purchased under agreements to resell:	
Federal funds sold	153
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	56,630
LESS: Allowance for loan and lease losses	645
Loans and leases, net of unearned income and allowance	55,985
Trading assets	0
Premises and fixed assets (including capitalized leases)	3,364
Other real estate owned	481
Intangible assets:	
Goodwill	155
Other intangible assets	0
Other assets	7,957
Total assets	89,334
Deposits:	
In domestic offices:	69,263
Noninterest-bearing	17,348
Interest-bearing	51,915
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	486
Total liabilities	69,749
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	2,000
Surplus (exclude all surplus related to preferred stock)	15,214
Retained earnings	2,373
Accumulated other comprehensive income	(2)
Other equity capital components	0
Total equity capital	19,585
Total liabilities, minority interest, and equity capital	89,334

DECEMBER 31, 2016
IRELAND BANK
MALAD CITY, IDAHO
Charter No. 7
Charter Issued May 1, 1899
Incorporated December 8, 1892

OFFICERS:

President & CEO: Bruce Lowry
Chief Operations Officer: Cheryl Sorensen
Chief Financial Officer: Tony McClain
Chief Credit Officer: Blake Marchant

DIRECTORS:

Timothy P. Deeg; David G. Jenkins;
Bruce Lowry; Randall E. Marshall;
Randon W. Wilson

Cash and balances due from depository institutions:	(000's omitted)
Noninterest-bearing balances and currency and coin.	1,716
Interest-bearing balances	3,616
Securities:	
Held-to-maturity securities	11,896
Available-for-sale securities	40,433
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	150,989
LESS: Allowance for loan and lease losses	1,536
Loans and leases, net of unearned income and allowance	149,453
Trading assets	0
Premises and fixed assets (including capitalized leases)	1,716
Other real estate owned	2,027
Intangible assets:	
Goodwill	222
Other intangible assets	0
Other assets	7,347
Total assets	<u>218,426</u>
Deposits:	
In domestic offices:	190,668
Noninterest-bearing	75,490
Interest-bearing	115,178
Federal funds purchased and securities sold under agreements to repurchase:	
Federal funds purchased	0
Securities sold under agreements to repurchase	495
Trading liabilities	0
Other borrowed money	4,413
Subordinated notes and debentures	0
Other liabilities	581
Total liabilities	<u>196,157</u>
Minority interest in consolidated subsidiaries	0
Perpetual preferred stock and related surplus	0
Common stock	705
Surplus (exclude all surplus related to preferred stock)	6,370
Retained earnings	15,763
Accumulated other comprehensive income	(569)
Other equity capital components	0
Total equity capital	<u>22,269</u>
Total liabilities, minority interest, and equity capital	<u><u>218,426</u></u>

DECEMBER 31, 2016
NORTHWEST BANK
BOISE, IDAHO
Charter No. 262
Charter Issued March 25, 2008
Incorporated September 6, 2007

OFFICERS:

President & Chief Executive Officer: James R. Shulman
Chief Financial Officer: Debra L. Johnson
Chief Credit Officer: Thomas A. Vander Ploeg

DIRECTORS:

Tami M. Chafin; Jeffery D. Gow; William K. Ilett;
Gary G. Michael; John W. Mitchell;
James R. Shulman; Steven D. Wasson

Cash and balances due from depository institutions:	(000's omitted)
Noninterest-bearing balances and currency and coin.	5,660
Interest-bearing balances	29,655
Securities:	
Held-to-maturity securities	0
Available-for-sale securities	23,750
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	1,899
Loans and leases, net of unearned income	454,245
LESS: Allowance for loan and lease losses	5,370
Loans and leases, net of unearned income and allowance	448,875
Trading assets	0
Premises and fixed assets (including capitalized leases)	499
Other real estate owned	0
Intangible assets:	
Goodwill	0
Other intangible assets	904
Other assets	9,303
Total assets	521,070
Deposits:	
In domestic offices:	419,975
Noninterest-bearing	123,807
Interest-bearing	296,168
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	28,079
Subordinated notes and debentures	0
Other liabilities	3,223
Total liabilities	451,277
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)	51,581
Retained earnings	14,671
Accumulated other comprehensive income	41
Other equity capital components	904
Total equity capital	69,793
Total liabilities, minority interest, and equity capital	521,070

DECEMBER 31, 2016
THE BANK OF COMMERCE
IDAHO FALLS, IDAHO
Charter No. 225
Charter Issued March 30, 1959
Incorporated March 30, 1959

OFFICERS:

President & CEO: Thomas J. Romrell
Chief Financial Officer: Ronald M. Johnson
Chief Credit Officer: A. Michael Morrison
Chief Operating Officer: Carlan McDaniel

DIRECTORS:

Ross M. Bowen;
Calvin Erb; Newman Giles;
Todd Groberg; Bruce Lake;
William Reed; Thomas J. Romrell

Cash and balances due from depository institutions:	(000's omitted)
Noninterest-bearing balances and currency and coin.	24,507
Interest-bearing balances	144,662
Securities:	
Held-to-maturity securities	86,635
Available-for-sale securities	86,937
Federal funds sold and securities purchased under agreements to resell:	
Federal funds sold	65,752
Securities purchased under agreements to resell	0
Loans and lease financing receivables:	
Loans and leases held for sale	1,945
Loans and leases, net of unearned income	664,696
LESS: Allowance for loan and lease losses	6,285
Loans and leases, net of unearned income and allowance	658,411
Trading assets	0
Premises and fixed assets (including capitalized leases)	15,594
Other real estate owned	1,970
Intangible assets:	
Goodwill	0
Other intangible assets	0
Other assets	11,344
Total assets	1,097,757
Deposits:	
In domestic offices:	
Noninterest-bearing	930,702
Interest-bearing	374,294
Federal funds purchased and securities sold under agreements to repurchase:	556,408
Federal funds purchased	
Securities sold under agreements to repurchase	0
Trading liabilities	0
Other borrowed money	0
Subordinated notes and debentures	0
Other liabilities	5,774
Total liabilities	936,476
Minority interest in consolidated subsidiaries	
Perpetual preferred stock and related surplus	
Common stock	2,000
Surplus (exclude all surplus related to preferred stock)	29,200
Retained earnings	129,688
Accumulated other comprehensive income	393
Other equity capital components	0
Total equity capital	161,281
Total liabilities, minority interest, and equity capital	1,097,757

STATE OF IDAHO
STATE-CHARTERED CREDIT UNIONS
COMPARATIVE STATEMENT
Close of Business 12/31/16 and 12/31/15

<u>ASSETS</u>	2016	2015	% Change
Cash and Cash Equivalents	198,277,648	191,177,502	3.7
Unsecured Credit Card Loans	181,793,382	155,628,243	16.8
All Other Unsecured Loans	59,128,282	45,348,491	30.4
New Auto Loans	724,800,036	621,473,629	16.6
Used Auto Loans	1,033,280,795	1,077,973,151	(4.1)
First Mortgage Real Estate Loans/Lines of Credit	1,391,249,719	1,147,211,527	21.3
Other Real Estate Loans	240,276,973	194,110,338	23.8
Other Loans, Leases, and Non-Federally Gtd Student Loans	419,487,344	280,355,728	49.6
Total Loans	4,050,016,531	3,522,101,107	15.0
Allowance for Loan and Lease Losses	(17,628,881)	(12,669,578)	39.1
Loans Held For Sale	17,614,042	14,373,347	22.5
Loans Including Loans For Sale Less ALLL	4,050,001,692	3,523,804,876	14.9
Available for Sale (AFS) Securities	56,842,864	59,764,828	(4.9)
Held-to Maturity Securities	8,560,044	22,052,193	(61.2)
Deposits in Commercial Banks, Savings & Loans, Savings Banks	121,051,237	101,334,126	19.5
Loans to, Deposits in, & Investments in Natural Person CUs	21,073,118	15,165,030	39.0
Membership Capital and Paid-in Capital at Corporate CUs	2,963,316	2,878,592	2.9
All Other Investments in Corporate Credit Unions	100,000	563,000	(82.2)
All Other Investments	35,422,019	38,525,622	(8.1)
Total Investments	246,012,598	240,283,391	2.4
Land and Building (Net of Dep)	151,361,550	126,852,107	19.3
Other Fixed Assets	15,771,876	15,660,372	0.7
NCUA Share Insurance Capitalization Deposit	34,251,421	30,045,838	14.0
Other Assets	77,845,457	58,456,808	33.2
TOTAL ASSETS	4,773,522,242	4,186,280,894	14.0
<u>LIABILITIES, SHARES AND EQUITY</u>			
Promissory and other Notes Payable	38,200,349	250,937,807	(84.8)
Accrued Dividends and Interest Payable	5,309,710	3,864,086	37.4
Accounts Payable & Other Liabilities	86,237,629	49,463,933	74.3
Total Liabilities	129,747,688	304,265,826	(57.4)
Share Drafts	779,798,727	646,067,028	20.7
Regular Shares	1,088,999,892	900,457,553	20.9
All Other Shares and Deposits	2,339,414,238	1,962,689,818	19.2
Total Shares And Deposits	4,208,212,857	3,509,214,399	19.9
Undivided Earnings	335,904,486	279,422,986	20.2
Regular Reserves	94,751,929	87,232,540	8.6
Other Reserves	229,118	229,118	-
Equity Acquired in Merger	9,468,549	13,649,054	(30.6)
Miscellaneous Equity	5,978,825	-	-
Unrealized Gain/Loss on AFS Securities	(1,051,721)	(253,5800)	314.7
Other Comprehensive Income	(9,719,489)	(7,479,449)	29.9
Total Equity	435,561,697	372,800,669	16.8
TOTAL LIABILITIES, SHARES, AND EQUITY	4,773,522,424	4,186,280,894	14.0

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

Name	City	State	12/31/2016	12/31/2015	% Change
<u>Idaho State-Chartered Credit Unions</u>					
Boise Fire Department Credit Union	Boise	ID	\$8,563,898	\$8,676,652	(1.3)
Clarity Credit Union (previously known as Idadiv)	Nampa	ID	68,606,826	65,493,494	4.8
Clearwater Credit Union	Lewiston	ID	n/a	23,045,555	-
Connections Credit Union (previously known as Potelco United)	Pocatello	ID	149,598,492	142,166,068	5.2
Cornerstone Credit Union	Caldwell	ID	n/a	15,602,660	-
E.S.A. Credit Union	Boise	ID	6,152,357	6,342,415	(3.0)
East Idaho Credit Union	Idaho Falls	ID	268,107,334	262,657,459	2.1
Freedom Northwest Credit Union (previously known as Kamiah Community)	Kamiah	ID	83,283,016	66,305,324	25.6
Health Care Idaho Credit Union	Boise	ID	13,190,620	12,645,119	4.3
Icon Credit Union (previously known as Idahy)	Boise	ID	269,291,034	253,328,765	6.3
Idaho Central Credit Union	Pocatello	ID	2,810,896,842	2,418,391,383	16.2
Idaho United Credit Union	Boise	ID	32,436,713	29,434,498	10.2
Jefferson County Public Employees Credit Union	Menan	ID	n/a	278,391	-
Latah Credit Union	Moscow	ID	88,994,765	n/a	-
Lewis Clark Credit Union	Lewiston	ID	91,976,250	57,120,167	61.0
Members Preferred Credit Union	Idaho Falls	ID	23,775,098	21,149,667	12.4
Mini-Cassia Employees Credit Union	Burley	ID	562,667	583,001	(3.5)
Mountain Gem Credit Union	Nampa	ID	20,582,618	19,489,036	5.6
Northwest Christian Credit Union	Nampa	ID	55,797,928	50,711,394	10.0
Pine Tree Community Credit Union	Grangeville	ID	43,448,272	42,330,096	2.6
Pocatello Simplot Credit Union	Pocatello	ID	30,055,820	31,219,274	(3.7)
Simplot Employees Credit Union	Caldwell	ID	19,555,681	18,690,142	4.6
St. Alphonsus Medical Credit Union	Boise	ID	5,474,339	4,814,296	13.7
St. Joe Valley Credit Union	St. Maries	ID	8,228,635	7,268,167	13.2
Westmark Credit Union	Idaho Falls	ID	667,202,719	620,577,403	7.5
Total Idaho State-Chartered Credit Union Assets			\$4,773,522,242	\$4,186,280,894	14.0
<u>Other State-Chartered Credit Unions Operating in Idaho (Idaho Assets)</u>					
Global Credit Union	Spokane	WA	\$19,451,550	\$20,174,099	(3.6)
Horizon Credit Union	Spokane	WA	56,770,228	58,313,026	(2.6)
Numerica Credit Union	Spokane	WA	279,887,337	208,370,786	34.3
Spokane Teachers Credit Union	Spokane	WA	150,902,667	122,088,332	23.6
Silverado Credit Union	Angwin	CA	1,112,103	1,239,011	(10.2)
Total Other State-Chartered Credit Unions			\$508,123,885	\$410,185,254	23.9
Total Idaho Assets			\$5,281,646,127	\$4,596,466,148	14.9

SECURITIES BUREAU SANCTIONS REPORT

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

March 6, 2017

JEFFREY GRANT JEROME, Ada County, ID – A civil securities lawsuit was filed against Boise resident, Jeffrey Grant Jerome (Jerome). The suit alleged that Jerome violated registration and anti-fraud provisions of the Idaho Uniform Securities Act in connection with the offer and sale of promissory notes and investment contract securities related to the Boise event center Powerhouse.

The complaint further alleged that Mr. Jerome raised approximately \$238,500 from at least 17 Idaho investors and falsely led many investors to believe that they would have an ownership interest in the Powerhouse building. Mr. Jerome is also alleged to have defrauded investors by not using their money for the stated purposes and for engaging in false and misleading statements regarding material facts.

The Department seeks \$141,176 in restitution, civil penalties of at least \$60,000 and restrictions on Mr. Jerome’s future business dealings.

April 13, 2017

RICHARD “RICK” F. GUYON and JANE DOES 1 through 5, Ada County, ID – A civil securities lawsuit was filed against Boise resident, Richard F. Guyon (Guyon). The suit alleges that Mr. Guyon violated the registration and anti-fraud provisions of the Idaho Uniform Securities Act in connection with a fraudulent money-raising scheme.

The complaint alleged that Guyon raised over \$2 million from several Idaho investors and falsely led the investors to believe that he was managing a \$12 million portfolio of family money and would invest in various securities on their behalf. Further, Guyon is alleged to have defrauded investors by not using their money for the stated purposes and by engaging in false and misleading statements regarding material facts. The Department seeks \$2,223,450 in restitution while asking the court for civil penalties of at least \$60,000.

The complaint had alleged that other parties may have materially aided Guyon in his scheme and, on July 6, 2017, Deborah French (aka Deborah Thomas) and Julia Ovando were named as additional defendants in this matter.

II. ADMINISTRATIVE SANCTIONS & ORDERS ISSUED UNDER THE IDAHO UNIFORM SECURITIES ACT/IDAHO ESCROW ACT/IDAHO MONEY TRANSMITTERS ACT

July 18, 2016

BROOKES VENTURES, LLC dba AULTERRA INTERNATIONAL, and KIM ARMOND DANDURAND, Hayden, ID – Agreement and Order – The Department alleged that the Respondents engaged in omissions of material facts in connection with the offer and sale of unregistered securities. In addition, the Department alleged that Dandurand was not licensed to sell securities in or from Idaho as required by Idaho securities laws. In resolution of the State’s investigation, the Respondents agree to 1) pay restitution of \$25,000 within 3 years of the date of the order, and 2) pay a civil penalty of \$5,000. The civil penalty is to be waived if the Respondents comply with all the terms of the order.

September 13, 2016

UCI WEALTH ADVISORS, LLC and TRAVIS L. HIGGINS, Meridian, ID – Agreement and Order – In resolution of the State’s investigation, the Respondents neither admitted nor denied the findings of violations of Idaho law set forth in the Agreement and Order which included 1) unlawful compensation and unregistered “agent” activities, 2) undisclosed conflicts and misrepresentations/omissions, 3) taking loans from customers, 4) maintaining custody of client funds without complying with the custody safekeeping requirements, and 5) failing to amend Form ADV to properly disclose UCI’s affiliations and compensation arrangements.

Respondents agreed to 1) withdraw the Investment Adviser registration of UCI, 2) repay the client loans as proscribed in the order, and 3) pay \$19,700 in fines and penalties. Higgins also agreed to be subject to a heightened supervision plan upon employment as an investment adviser representative.

January 18, 2017

CACHE PRIVATE CAPITAL DIVERSIFIED FUND, LLC, Meridian, ID – Agreement and Order – In connection with an investigation, the Respondent neither admitted nor denied the findings of violations of Idaho law set forth in the Agreement and Order which included unlawful “agent” association, and material omissions and undisclosed conflicts associated with its relationship with Travis L. Higgins and UCI Wealth Advisors, LLC.

In resolution of the state’s allegations, the Respondent agreed to 1) provide certain Idaho investors with written supplemental disclosure information, 2) provide the Department with semi-annual reports detailing all redemption requests, 3) provide the Department with certain financial statements until December 31, 2019, 4) not offer, sell, or issue securities in or into Idaho to new investors for 3 years from the execution of the order, and 5) pay \$25,000 in fines and penalties.

February 20, 2017

RELIANT ESCROW TRANSACTION & COORDINATION, Boise, ID – Order To Cease And Desist – The Department issued this order against Reliant Escrow Transaction & Coordination (Reliant) citing violations of the Idaho Escrow Act and the Financial Fraud Prevention Act for falsely representing that Reliant was an escrow agency in Idaho. Reliant claimed to offer escrow services to prospective sellers of timeshare units in Mexico. However, Reliant does not reside in Boise and was not licensed by the Department as an escrow company or as any other type of financial service provider. The Director ordered that Reliant cease and desist from falsely purporting to be an Idaho escrow agency until such time as Reliant is licensed in Idaho as an escrow agency.

February 23, 2017

LIFELONG INVESTMENT MANAGEMENT SERVICES LLC and ERIC LEE, Boise, ID – Agreement and Order – the Department entered the order with Lifelong Investment Management Services LLC (Lifelong) after the Department determined that Lifelong had been conducting investment advisory business in Idaho without first registering as an investment adviser. Lifelong was an Alaska registered investment adviser when it moved its primary place of business to Idaho. To resolve the matter, Respondents agreed to pay an administrative penalty of \$500 and to refund all fees charged to Idaho clients from October 2015 through the date of the order.

February 28, 2017

COMMONWEALTH FOREIGN EXCHANGE, INC., Providence, RI – Consent Order – In connection with a review of the business

activities of Commonwealth Foreign Exchange, Inc (Commonwealth), the Department alleged that unlicensed money transmission activity had occurred in Idaho prior to the submission of the Respondent's money transmitter application. In resolution of the Department's allegations, Commonwealth neither admitted nor denied the State's findings of violations and agreed to pay a fine of \$20,000.

March 17, 2017

SEAQUEST HOLDINGS LLC and VINCENZO (VINCE) COVINO, Boise, ID – Agreement and Order – In connection with a Regulation D issuer filing and resulting investigation, the Department alleged material omissions of information in connection with the offer and sale of a security and unregistered agent activity. In resolving this matter, the issuer made additional disclosures, remedied the unregistered agent issue and agreed to pay a \$5,000 administrative penalty.

April 3, 2017

SUN VALLEY ADVISORS, INC and NEIL M. JESSEN, Ketchum, ID – Agreement and Order – In connection with a review of the business activities of Sun Valley Advisors, Inc., the Department alleged that unregistered investment adviser and unregistered investment adviser representative activity had occurred in Idaho prior to the submission of a completed investment adviser application. In resolution of the Department's allegations, the Respondents agreed to pay an administrative penalty of \$500 and to return all fees charged to Idaho clients from July 2016 through the date of the order.

May 4, 2017

HALLMARK INVESTMENTS INC., New York, NY – Order Denying Application For Registration – The Department issued an order denying the Hallmark Investments Inc. (Hallmark) application for broker-dealer registration in Idaho after it failed to produce supplemental information and records required by the Department as part of the application process. The Department sought information about the facts and circumstances of a disciplinary proceeding filed by the Financial Regulatory Authority (FINRA) against Hallmark shortly before it applied for registration in Idaho. FINRA alleged serious, illegal misconduct by Hallmark in its disciplinary proceeding, including selling stock to clients at fraudulently inflated prices.

May 19, 2017

RUSS TRADING INC., NICOLAS RUSSO JR., CACTUS PARTNERS LP., Sandpoint, ID – Agreement and Order - In connection with a review of the business activities of Russ Trading Inc. (RT), the Department alleged Nicolas Russo Jr. (Russo) and RT

conducted business as an investment adviser and gave investment advice without proper registration during January 2015. Further, the Department alleged that Russo had custody of client funds in Cactus Partners LP (Cactus) but had failed to conduct an annual, independent audit as required by the Investment Advisers Act of 1940. Respondents admitted to the violations and agreed to 1) pay an administrative penalty in the amount of \$5,000, 2) a 1 day suspension of the Idaho investment adviser registration of RT, 3) withdraw the Idaho investment adviser firm registration for RT, 4) not reapply for investment adviser or investment adviser representative registration in Idaho, and 5) liquidate Cactus Partners LP and disburse all investment funds back to investors in the fund.

June 12, 2017

TEDDY L. ROBERTS, Pocatello, ID – Agreement and Order – In connection with an investigation, the Respondent admitted to the violations of the Idaho Uniform Securities Act, including the offer and sale of unregistered gold bullion purchase contracts, as well as misrepresentations and omissions of material facts to Idaho investors under both the Idaho Uniform Securities Act and the Idaho Commodity Code.

The action results from Robert's offer and sale of Clean Energy Association (CEA) gold bullion purchase contracts. CEA owner Lloyd Benton Sharp aka Kevin Thomas was convicted of securities fraud by an Oregon District Court in April of 2015 regarding a \$1.3 million international bio-diesel fuel investment offering and was ordered to pay restitution in the amount of \$6,021,482 to victims of all his investment schemes. The Idaho investors in CEA were included in the restitution ordered by the Oregon District Court. Roberts was implicated in the same federal action but was not charged. Roberts agreed to a \$20,000 civil penalty with \$19,000 waived due to Roberts' stated financial inability to pay.

CONSUMER FINANCE BUREAU SANCTIONS REPORT

I. ORDERS ISSUED UNDER THE IDAHO CREDIT CODE

January 31, 2017 **MAGIC VALLEY FINANCE, INC.** (Twin Falls, Idaho) – Consent Order issued addressing unlicensed activity under the Idaho Credit Code (ICC). The Respondent admitted to the allegations, including extending regulated loans to Idaho residents between October 27, 2014 and August 17, 2017, without a license. The Respondent paid the Department \$5,500 in investigative costs and attorney fees. Magic Valley Finance, Inc. subsequently applied for and was granted an Idaho regulated lender license.

II. ORDERS ISSUED UNDER THE IDAHO COLLECTION AGENCY ACT

December 27, 2016 **PROCOLLECT, INC.** (Dallas, Texas) – Order to Cease and Desist for engaging in collection activities in Idaho without the license required by the Idaho Collection Agency Act. The order required the Respondent, ProCollect, Inc., to immediately cease and desist from engaging in unlicensed debt collection activities in Idaho. The Respondent did not contest the Order.

January 10, 2017 **NATIONAL PRINCIPAL GROUP, LLC** (Buffalo, New York) – Order to Cease and Desist for engaging in collection activities in Idaho without the license required by the Idaho Collection Agency Act. The order required the Respondent, National Principal Group, LLC, to immediately cease and desist from engaging in unlicensed debt collection activities in Idaho. The Respondent did not contest the Order.

January 31, 2017 **RENT RECOVERY SOLUTIONS, LLC** (Atlanta, Georgia) – Order to Cease and Desist for engaging in collection activities in Idaho without the license required by the Idaho Collection Agency Act. The order required the Respondent, Rent Recovery Solutions, LLC, to immediately cease and desist from engaging in unlicensed debt collection activities in Idaho. The Respondent did not contest the Order.

March 4, 2017 **THE CREDIT PROS INTERNATIONAL CORPORATION** (Newark, New Jersey) – Consent Order issued addressing this New Jersey

corporation's acts of operating a credit repair business in Idaho without the license required by the Idaho Collection Agency Act. Under the terms of the Consent Order, the company agreed: (i) to refund all Idaho residents the fees collected for its credit repair services, (ii) not to engage in any further unlicensed activities in Idaho, and (iii) to pay the Department attorney fees and investigative costs in the amount of \$2,500. The company had previously entered into a Consent Order with the Department on March 30, 2012, for similar violations. The Respondent subsequently applied for and was granted an Idaho collection agency license.

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

April 13, 2017 **AMERICAN ADVISORS GROUP dba AMERICAN ADVISORS GROUP, INC.** (Orange, California) – Consent Order addressing Respondent's over-collecting of government recording charges (GRCs) from Idaho borrowers despite prior notices. Under the terms of the Consent Order, American Advisors Group (AAG) agreed to pay to the Department an administrative penalty in the amount of \$125,000, with \$50,000 of that amount suspended pending results of the Department's examination of AAG during calendar year 2018. If AAG does not rectify the problem and is still overcharging for GRCs, it will be required to pay to the Department the \$50,000 suspended penalty.

April 20, 2017 **OCWEN LOAN SERVICING, LLC** (West Palm Beach, Florida) – Order to Cease and Desist issued as a result of the discovery of violations of Idaho mortgage laws and rules stemming from a multi-state examination (the examination) of Ocwen. During the examination, the Department and representatives of other examining states identified violations of state and federal laws including, but not limited to, consumer escrow accounts that could not be reconciled. The examination also found that Ocwen failed to make timely disbursements to pay for tax and insurance from consumer escrow accounts. The examination also found that Ocwen routinely sent consumers inaccurate, confusing and/or misleading escrow statements. The order required Ocwen to immediately cease and desist from acts, practices, or omissions that constitute violations of the Idaho Residential Mortgage Practices Act and corresponding rules, including specifically misapplying consumer escrow accounts, and providing inaccurate information to consumers about their escrow accounts.

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

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- November 17, 2016 **SASSAN MESDAGHI** (Laguna Beach, California) – Order denying an application for a mortgage loan originator license for failing to disclose outstanding federal tax liens on the license application. Mr. Mesdaghi did not request a hearing to contest the denial.
- February 16, 2017 **ALLAN RAY EICHHORN** (Meridian, Idaho) – Final Order concluding the matter in the Department’s administrative denial of Mr. Eichhorn’s loan originator license application. A Notice of Denial and Notice of Opportunity to Request a Hearing was issued on February 9, 2017, after Mr. Eichhorn failed to disclose outstanding court judgments on his license application. Eichhorn waived his right to an administrative hearing on February 15, 2017 and the Final Order was issued.
- March 23, 2017 **ANTERO DAVID ITURRIRA** (San Diego, California) –Consent Order addressing Mr. Iturriria’s submission of falsified bank statements to the Department in the process of renewing his Idaho mortgage loan originator license. Mr. Iturriria admitted to submitting to the Department bank statements that, without his knowledge, had been materially altered by a family member. Mr. Iturriria agreed not to reapply for an Idaho loan originator license for a period of five years.
- May 18, 2017 **DANIEL LANE FULLMER** (Meridian, Idaho) – Consent Order addressing violations of the Idaho Residential Mortgage Practices Act (Act), involving attempts to influence appraiser valuations of properties. Mr. Fullmer consented to a suspension of his Idaho mortgage loan originator license for the remainder of the year and agreed not to reapply for an Idaho loan originator license for a period of two years. Mr. Fullmer also agreed not to become a designated “control person” (as defined by Idaho Code § 26-31-102(2)) of an Idaho licensed mortgage broker/lender location for a period of three years.
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FINANCIAL INSTITUTIONS BUREAU SANCTIONS REPORT

I. ORDERS ISSUED UNDER THE IDAHO TRUST INSTITUTIONS ACT

- August 16, 2016 **LEGACY FIDUCIARY SERVICES, LLC AND KENNETH LEROY JOHNSON, Meridian, ID** – Consent Order with Legacy Fiduciary Services, LLC (Legacy) and Kenneth Leroy Johnson for violating the Idaho

Trust Institutions Act. Johnson is the President and Managing Member of Legacy. Legacy and Johnson acted as a fiduciary and conducted trust business in the state without authorization or issuance of a charter by the Director to act as a fiduciary and engage in trust business in Idaho. The Consent Order states that Legacy and Johnson's activity violated the Act, and requires Legacy and Johnson to transfer all fiduciary property, accounts, and relationships, that they administer which do not meet the exceptions listed in the Act. The Consent Order also requires Legacy and Johnson to not engage in unauthorized trust activity or act in a fiduciary capacity until the Director has given authorization or issued a state trust company charter.

YEARS OF STATE SERVICE AS OF JUNE 30, 2017
Recognizing over 730 years of Combined Service to the State of Idaho

Employee	Years of Service	Title
ADMINISTRATION		
Gavin M. Gee	42.4	Director of Finance
James A. Burns	30.0	Securities Bureau Chief
Mary E. Hughes	27.2	Financial Institutions Bureau Chief
Mike Larsen	21.9	Consumer Finance Bureau Chief
David L. Jensen	12.7	Supporting Services Bureau Chief
Lisa A. Baker	6.3	Administrative Assistant 2
SUPPORTING SERVICES BUREAU		
Jill R. Peterson-Pate	20.3	Financial Specialist
Barbara H Jones	4.6	Human Resources Specialist
Blake Wickham	7.6	IT Systems Integration Analyst, Sr.
Homero P. Rodriguez	6.7	Web Developer
Richard Baker	4.2	IT Programmer Analyst, Sr.
Aaron Hundt	1.4	Office Specialist 2
FINANCIAL INSTITUTIONS BUREAU		
Brad P. Bergquist	36.7	Financial Institutions Examiner, Commissioned Sr.
Mark W. Boschulte	16.1	Financial Institutions Examiner, Commissioned Sr.
Richard J. Sherrick	14.0	Financial Institutions Examiner, Commissioned Sr.
Connie D. Newgard	13.7	Financial Institutions Examiner, Commissioned Sr.
Andrew C. Forth	12.9	Financial Institutions Examiner, Commissioned Sr.
Jeffrey C. Reinhardt	8.0	Financial Institutions Examiner, Commissioned Sr.
James J. Tunca	6.9	Financial Institutions Examiner, Commissioned Sr.
Salvador Cruz	3.8	Financial Institutions Examiner, Commissioned Sr.
Gordon E. Titus	7.4	Financial Institutions Examiner, Commissioned
Robert Moore	4.2	Financial Institutions Examiner, Commissioned
Sydney M. Hanchey	2.7	Financial Institutions Examiner 3*
Gabriel Quintero Corredor	1.8	Financial Institutions Examiner 2*
Marquita L Gonzales	1.6	Financial Institutions Examiner 2*
Joanna Johnson	.7	Financial Institutions Examiner 2*
Vacant		Financial Institutions Examiner
Vacant		Financial Institutions Examiner
Vacant		Financial Institutions Examiner
Tracy L. English	4.4	Administrative Assistant 1
Elizabeth Adcock	4.7	Office Specialist 2
		*underfilling Financial Institutions Examiner, Commissioned

CONSUMER FINANCE BUREAU

Karlyne C. (K.C.) Schaler	19.4	Financial Examiner/Investigator 4
Anthony T. Polidori	16.7	Financial Examiner/Investigator 4
Dustin Mortimer	5.7	Financial Examiner/Investigator 3
Gabe Gerrish	5.7	Financial Examiner/Investigator 3
Brad C. Carpenter	5.8	Financial Examiner/Investigator 3
Jillian K. Laine	5.8	Financial Examiner/Investigator 3
Laurie J. Coburn	5.8	Financial Examiner/Investigator 3
Tom H. Nate	8.5	Financial Examiner/Investigator 3
Tom S. Little	10.9	Financial Examiner/Investigator 3
Erin J. Van Engelen	12.1	Financial Examiner/Investigator 3
Daniel D. Kline	12.4	Financial Examiner/Investigator 3
Janet L. Kochan	12.9	Financial Examiner/Investigator 3
Bennie J Bourn	5.9	Financial Examiner/Investigator 1*
Zhunshuai 'Mike' Li	4.3	Financial Examiner/Investigator 1*
Glenn P Lyons	1.2	Financial Examiner/Investigator 1*
Jo Ann Lanham	25.6	Consumer Affairs Officer
Mel White	5.9	Administrative Assistant 1
Matthew Melton	2.7	Administrative Assistant 1
Christian M Taroreh	1.6	Administrative Assistant 1
Brenda L Clement	1.4	Administrative Assistant 1
Kimberley A. Banner	3.7	Office Specialist 2
Stephanie M. Sanders	3.0	Office Specialist 2

**underfilling Financial Examiner/Investigator 3*

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Timothy D. Martin	28.3	Financial Examiner/Investigator 3
Nancy C. Ax	19.3	Financial Examiner/Investigator 3
Walter L. Bitner	16.1	Financial Examiner/Investigator 3
Kurt V. Merritt	9.1	Financial Examiner/Investigator 3
Jeffrey R. Flora	3.8	Financial Examiner/Investigator 3
Kristen D. Butler	8.1	Financial Examiner/Investigator 2*
Norman J. Real	4.4	Financial Examiner/Investigator 2*
Mary J. Harper	20.5	Program Information Coordinator
Karabeth Tillman	3.6	Securities Technician

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Brian Nicholas	30.0	Deputy Attorney General
Alan Conilogue	17.5	Deputy Attorney General
Stephanie Sze	4.5	Paralegal

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