



THE IDAHO COMPLIANCE CONNECTION

SPRING 2012

INSIDE THIS ISSUE:

An Update on the Dodd-Frank Wall Street Reform and Consumer Protection Act	1
Continuing Education Opportunity	2
NMLS Application and Renewal Attestation	3
Certified Mail Notice	4
Top Complaints	5
Did You Know?	6
Welcome to the Department of Finance	6
Consumer Finance Bureau Statistics	7
Warning Letter Notice for Collection Agencies	8
"TIP" Over Box	8
Instructions for the Notification of Agents/Collector Report	9
Enforcement Actions	10



A visitor to our office complex this Spring

An Update on the Dodd-Frank Wall Street Reform and Consumer Protection Act

The Fall 2010 issue of Compliance Connection provided a synopsis of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) and of the responsibilities of the Consumer Financial Protection Bureau (CFPB). In that article the Department discussed many of the provisions of the Dodd-Frank Act with the intent of giving a general overview of the Act and the authorities of the CFPB. Since that time the CFPB has issued various rules and has published several guidance documents that give greater clarity to industries covered by the Dodd-Frank Act as to the compliance requirements and standards established by the CFPB. Because of this, the Department's Consumer Finance Bureau is adapting its examination processes to help aid licensees in preparation of oversight by the CFPB.

First, to briefly recap our previous article, the Dodd-Frank Act covers most of the activities in which the Department's licensees engage, and the CFPB has oversight responsibility of entities that engage in offering or providing consumer financial services or products. Therefore, though the Dodd-Frank Act grants the CFPB specific oversight over mortgage activities, payday lending, and private student lending, it may also extend its oversight to consumer finance activities engaged in by all of the Department's other licensees. The CFPB's oversight of financial product and service providers begins with its authority to interpret, develop, and implement regulations related to financial services. The CFPB also has the authority to require reporting by entities engaged in offering financial services and products and to conduct examinations of such entities.

In October 2011, the CFPB began issuing specific examination guidance documents with the publication of the first edition of its [Supervision and Examination Manual](#). The manual is a substantial guidance document that serves the function of providing supervised entities with a description of the CFPB examination process, the information that will be sought by examiners, and the method of analyzing and reporting examination findings. Though to many licensees the procedures contained within the manual may appear to be

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more applicable to larger financial institutions, it should be noted that the manual serves as a general guidance document that should inform each licensee of the expectations of the CFPB.

Since the publication of the manual, the CFPB also published its Mortgage Origination Examination Procedures in January 2012. This guidance document provides information about the specific segments of the CFPB examination process as it relates to mortgage originations from advertising to closing, and includes modules relative to privacy practices, fair lending issues, and the adequacy of a company’s compliance systems based on the types of products the company offers. Additionally, in January 2012 the CFPB published its Short-Term, Small-Dollar Lending Examination Procedures. This procedure manual serves to describe the process for examinations focused on payday lending activity. However, it should be noted that each of these guidance documents supplement the CFPB’s Supervision and Examination Manual and do not necessarily stand alone as examination procedures. That is, licensees subject to oversight by the CFPB should be prepared to meet the compliance

requirements and standards of the manual and any applicable examination procedures guidance.

With that in mind, the Department is in the process of revising many of its own examination practices to incorporate elements relative to the CFPB’s examination procedures. As a part of these process changes, future Department examinations will include more of a focus on a licensee’s compliance systems. For instance, the Department will devote more time to evaluating the licensee’s ability to monitor, identify, and correct compliance exceptions. By doing so, the Department hopes to provide licensees with recommendations that will not only improve their future compliance but assist them in complying with the standards implemented by the CFPB.

In fulfilling its mission, the CFPB will be adopting more rules and issuing more guidance documents over the next several months. Many of these may relate to the industries regulated by the Department. In conjunction with CFPB’s activities, the Department will continue to assist its licensees in meeting the CFPB’s compliance expectations through the Department’s examination process and through regular communications, such as the Compliance Connection.

SAVE THE DATES

IAMP, IMLA, NAPMW in conjunction with the Idaho Department of Finance present.....

Eight hours of continuing education (meeting all licensing requirements)

BOISE: Thursday, October 18, 2012
 Department of Finance Conference Center (MK Plaza)
COEUR D’ALENE: Tuesday, October 2, 2012
 Location to be determined

Watch for registration information coming in July!



Idaho Association of Mortgage Professionals
 P.O. Box 7981, Boise, ID 83707



Phone: 208-321-9309, Fax: 208-321-4819
 Email: jcarrell@amsidaho.com
 www.idahomortgageprofessionals.org

NMLS Application and Renewal Attestation: What is it and What Does it Mean to You?

In the last two years the Department of Finance has sent Letters of Warning to approximately 1,250 of its mortgage loan originator licensees for filing false attestations through the Nationwide Mortgage License System (NMLS). What is an attestation and why does the Department take this information so seriously? Merriam-Webster defines "attestation" as:

- 1A: To affirm to be true or genuine; specifically: to authenticate by signing as a witness
- 1B: To authenticate officially



The attestation each loan originator and company administrator completes in the NMLS is a legal oath to the Department equivalent to a notarized signature. The attestation replaced the 'wet' signature on the applications when the mortgage industry transitioned to the NMLS.

It is important to understand that there are two types of attestations in the NMLS. The first type is completed at the filing of an initial license application and when amendments are made to an application form (i.e. update addresses, phone numbers, disclosures, or other information.) This "application attestation" or "amendment attestation" is filed every time a new license application is submitted or an amendment is made at any time to an existing application.

The second is the "renewal attestation" which must be completed during the annual license renewal period of November 1 through December 31. The "renewal attestation" is specific to the renewal request and serves as the oath to the Department attesting (as of that date), that (i) all license renewal requirements are complete, such as continuing education, background checks, credit authorizations, financial statements (company only), and clearance of any deficiency items, (ii) the application record is current, and (iii) the filing is truthful and accurate.

Specific language of the renewal attestation can be viewed through the following path on the NMLS: Composite View > View Individual/Company/Branch > View Renewals Attestation History > Filter >. Click on the license name link for renewal year 2012. The language may change slightly from year to year as new requirements or refinements to the NMLS are made, so it is very important to read the language carefully before submitting an attestation.

How to avoid filing a false "Renewal Attestation" and receiving a Letter of Warning? The answer is simple: review the "Composite View" information to make sure all renewal requirements have been posted to the NMLS before attesting. For instance, continuing education credits completed should be listed in the "Education Information" section of the "Composite View." To view all credits posted, including state specific credits, go into the detail portion of the "Continuing Education" section for the year completed to see a breakdown of all credits reported. To verify "Credit Report Authorization" and "Criminal Background Check" information, view the dates of posted results through "View Individual Snapshot." If there are outstanding deficient

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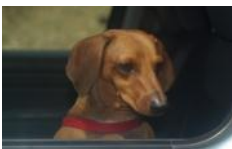
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license items, clear them before attesting. Keep in mind that the "Renewal Attestation" and renewal filing are separate actions and may be completed or submitted at different times. For example, a record may be attested to on November 1st, but not actually submitted for renewal until December 1st. The date of attestation is recorded at the time the attestation is completed, not the date of submitting the renewal request. Do not complete the "Renewal Attestation" until all requirements are fully complete even if the renewal submission is planned for a later date.

Renewal requirements for each state and jurisdiction are posted on the NMLS website annually and can be found in the "Renewal" sec-

tion of the NMLS Resource Center. Additionally, the Department sends e-mail notifications to all mortgage licensees annually in September or October to remind them of the requirements for license renewal. In 2011, a reminder was included: "DO NOT FILE A FALSE ATTESTATION" with instructions on how to avoid filing false information. The Department sends reminders as a courtesy to assist its licensees in submitting a successful renewal!

Questions about license renewal requirements may be directed to the Department's licensing staff at: (208) 332-8002 or by email at: mortgage@finance.idaho.gov or mlo@finance.idaho.gov.



**Knowledge is knowing a tomato is a fruit.
Wisdom is not putting it into a fruit salad. ~
Miles Beresford Kington**

Notice of Mail Delivery



	<p><i>Please pick up certified mail!</i></p> <p>Certain communications are sent to licensees via certified mail. <i>This information is usually time sensitive and requires action from the licensee within a specified time period.</i> If a certified mailing is returned to the Department, contact will be made with the licensee to verify the address. After three failed delivery attempts, the licensee will be required to arrange delivery of the communication at his or her own expense.</p>								

TOP COMPLAINTS RECEIVED BY THE DEPARTMENT

Unlicensed Activity

Of the complaints received by the Department for the time period of 11/1/2011 through 5/31/2012, almost half of these complaints related to unlicensed activity. The top three company types are: unlicensed third-party collection, debt settlement, and online payday loans. The Department's website has a listing of all Department of Finance licenses at <http://finance.idaho.gov>. Consumers are urged to check a company's status prior to conducting business.

Unlicensed Collection

The Department urges consumers to take caution in providing private financial information to third-party collectors prior to verifying whether the company is licensed to conduct collection activity in Idaho.

In some instances, fraudulent collection agencies use illegal and aggressive collection tactics such as threats of violence or criminal prosecution in an attempt to pressure consumers to immediately provide private financial information in order to obtain payment.

Unlicensed Payday Lenders

The Department is seeing instances with Internet payday lending where the Idaho consumer's loan is renewed more than three times, as well as patterns of repeated renewals; renewals make the short-term loan more expensive and ongoing.

The Department is also receiving complaints that involve payday lenders who claim tribal sovereign immunity from the states' licensing requirements. When a borrower contracts with a payday loan company that is unlicensed, the borrower takes a

significant risk in providing his/hers private account information to obtain a payday loan.

Unlicensed Debt Settlement companies

The Idaho Collection Agency Act includes the requirement that debt counselors, debt settlement companies, and credit repair companies be licensed *prior to conducting business in Idaho*. False claims include representations that the company can eliminate a consumer's debt and remove legitimate negative items from a debtor's credit report prior to the true expiration date (usually 7-10 years from date of occurrence).

Foreclosure-related complaints

The Department continues to receive calls from Idaho consumers who are seeking help with their mortgage loans. Primarily, borrowers cite the need for assistance in communicating with their lender to obtain a mortgage modification. Some of the consumers' loans are with Department licensees and the Department actively attempts to assist in communicating with the mortgage servicer in an effort to secure a satisfactory resolution.

Many of the foreclosure-related complaints are related to federally chartered banks / servicers. The Department forwards these complaints on behalf of Idaho consumers to the banks' / servicers' federal regulator to assist in opening the door to communication between parties to the mortgage loan.



"Contentment is not the fulfillment of what you want, but the realization of how much you already have." --Unknown

....Did You Know



Credit Reports — Credit Reports are required of mortgage entity control persons (Form MU2) and MLOs (Form MU4) for each application and *every annual license renewal*. Everyone should become familiar with [Idaho Policy 2011-01](#) pertaining to financial responsibility and the requirements to obtain or retain a license.

Renewal Notices and Forms — The Department does not mail annual renewal forms. For the past four years the Bureau has sent courtesy email notifications as a reminder to renew licenses and how to obtain necessary forms. ***It is important that all licensees keep current (preferably personal) email addresses on file with the Bureau.*** If your internal control systems block batch or bulk emails you may want to consider changing that or adding the department’s domain as a safe sender.

Renewal Licenses — The Department does not issue paper licenses except in the case of mortgage broker broker/lender licensees. Mortgage broker/lender licensees are still required by law to display their current license(s). All approved license information is displayed on the Department’s website at <http://finance.idaho.gov>, as well as renewal confirmation and other detailed information. Licenses may additionally be verified in the NMLS Consumer Access at <http://www.nmlsconsumeraccess.org> for mortgage brokers and lenders, mortgage loan originators and registered regulated lenders and exempt entities.

Enforcement Actions — Department enforcement actions taken against mortgage companies and mortgage loan originators, including those not licensed, may be accessed on the NMLS Consumer Access beginning July 23, 2012. Consumer Access is a centralized location to verify licensure and other information for the mortgage industry and can be accessed at <http://www.nmlsconsumeraccess.org/>.

Nationwide Mortgage Licensing System — The Nationwide Mortgage Licensing System (NMLS) can be reached by phone at (240) 386-4444 AND email at NMLS_CallCenter@statemortgageregistry.com.

Bureau Examiners — Bureau examiners participated in 11 consumer education conferences, high school and college financial education training programs reaching over 321 participants and attendees between November 1, 2011 and May 31, 2012.

The Bureau — The Bureau has processed 31,284 loan originator sponsorship /relationship requests since January 2, 2008 when the NMLS went live.

The Department is expanding its involvement on the NMLS to include licensing programs beyond the mortgage industry. — Later in 2012 money transmitters will be afforded the opportunity to obtain and renew their licenses through NMLS on a voluntary basis. The Department sent a survey to other consumer finance industries---consumer lenders (including payday and title lenders), escrow companies and collection agency licensees (including debt buyers, credit repair, debt settlement and credit counselors)—to gauge interest in NMLS participation. Responses are still being received and results analyzed. Watch for upcoming Department communications on this topic!



Welcome to the Department of Finance —

Karen Holcomb — Administrative Assistant to Examinations and Complaints — Karen holds an MBA from California State University San Bernardino and comes to the DOF with 15 years of marketing and business experience. She began her career working in an advertising agency before she moved into marketing for many different industries including high technology process control equipment, ophthalmic surgical equipment, and grocery and convenience stores. Karen is enjoying her transition into government work from the private sector and applying her skills in the Consumer Finance Bureau.



CONSUMER FINANCE BUREAU STATISTICS

AS OF MAY 31, 2012

Active Licensees (as of 05/31/12)	
Mortgage Brokers/Lenders	576
Mortgage Loan Originators (Approved-Active)	1,366
Mortgage Loan Originator (Approved-Inactive)	158
Escrow /1031 Exchange Companies	40
Regulated Lenders (inc. title lenders)	426
Payday Lenders	194
Collection Agencies	616
Debt/Credit Counselors	48
Debt Buyers	98
Credit Repair Company/Organization	8
Collection Agency Agents/Solicitors	41,055
 New Applications Received (11-1-11 to 5-31-12)	
Mortgage Brokers/Lenders	112
Mortgage Loan Originators	374
Regulated Lenders (inc. payday/title)	56
Collection Agencies (all categories)	90
Escrow/1031 Exchange Companies	3
 Revocations/Denials (11-1-11 to 5-31-12)	3
 Withdrawals (11-1-11 to 5-31-12)	
Mortgage Broker/Lenders	140
Mortgage Loan Originators	163
Escrow	3
Regulated Lenders (inc. payday/title)	32
Collection (all categories)	34
 Terminations (failed to renew licenses) (11-1-11 to 5-31-12)	
Mortgage Broker/Lenders	21
Mortgage Loan Originators	422
Escrow	3
Regulated Lenders (inc. payday/title)	9
Collection (all categories)	45
 Exams Conducted (11-1-11 to 5-31-12)	
Mortgage Brokers/Lenders	10
Escrow	0

Regulated Lenders (inc payday/title)	117
Collection Agency	43
 Complaints filed (written) (11-1-11 to 5-31-12)	
Mortgage (origination/servicing)	4
Loan Originators	0
Escrow/1031 Exchange	0
Collection Agency	22
Payday Lender, Regulated	
Lender (finance co., payday, title)	12
Idaho/Federal chartered banks	
and credit unions	12
Unlicensed activity (all categories)	86
 Complaints Closed (all) (11-1-11 to 5-31-12)	202



Act as if what you do makes a difference.
It does ~ Williams James



Collection agency licensees—Did you receive a warning letter for not filing the Notification of Agents report in the required format? Or for not filing timely? Did you receive a deficiency notice for failing to include your RPIC in the Notification of Agents or including the registration fee? Please take that extra moment to review the instructions that accompany this report form and call Karen Carlyle at 208-332-8085 prior to filing if you have questions.

Forms and instructions are available on the Department's website at <http://finance.idaho.gov> in the Collection Agency Forms section. Quarterly reports should be filed **no earlier** than a week prior to the deadline in order to provide the most current and accurate information. Quarterly filing dates should target between June 8-15, September 8-15 and December 8-15. Font size and format requirements are contained within the form instructions—please comply with the instructions to avoid having a filing returned.



“TIP” OVER BOX

Please keep your **email addresses and contact personnel information current!** The Department's primary method of communication and information distribution is electronic. Electronic communications include, but are not limited to:

- ▶ training notices;
- ▶ newsletters;
- ▶ renewal reminders and information;
- ▶ application and license deficiency notifications.

Companies are encouraged to have a **general** email on record that more than one party in their business can access and is not subject to change due to employee turnover. Individual licensees are encouraged to keep a personal, non-work related email address current. Ultimately, it is the licensee's responsibility to know the requirements of the law, rules and policies to maintain their licenses and operate their business activities within those standards.



INSTRUCTIONS FOR THE NOTIFICATION OF AGENTS/COLLECTOR REPORT

NEW APPLICATION INSTRUCTIONS:

- ✓ Complete the entire top left portion of the report (information about the licensee) and mark the box on the right indicating it is a new application;
- ✓ The list must be in alphabetical order and by location order;
- ✓ List terminated employees at the end of the Quarterly Report in alphabetical order and location order;
- ✓ Attach Legal Dispositions and explanations for checked Felony or Misdemeanor answers;
- ✓ A fee of \$20.00 (each) for all **new** active agents, including the RPIC(s), must accompany this report;
- ✓ Attach ONE check payable to the Idaho Department of Finance for the total fees due (\$20 for **each** Agent you are registering)

QUARTERLY REPORT INSTRUCTIONS:

- ✓ Quarterly Notification is DUE June 15, September 15, and December 15;
- ✓ Send the Quarterly Report only once a quarter **on or near the due date**;
- ✓ Complete the entire top left portion of the report (information about the licensee);
- ✓ Mark the quarter being reported with the year (i.e. 2009, 2010 etc) on the top right portion of the report;
- ✓ The list must be in alphabetical order and by location order;
- ✓ List terminated employees at the end of the Quarterly Report in alphabetical order and location order;
- ✓ Attach Legal Dispositions and explanations for checked Felony or Misdemeanor answers;
- ✓ A fee of \$20.00 (each) for all **new** active agents must accompany this report for reporting on June 15th, September 15th and December 15th;
- ✓ Attach ONE check payable to the Idaho Department of Finance for the total fees due (\$20 for **each new** agent you are registering);
- ✓ The Quarterly Report form may be copied or downloaded as needed; be sure the form is signed.

ANNUAL REPORT INSTRUCTIONS:

- Complete the entire top left portion of the report (information about the licensee);
- List **all ACTIVE** agents, including the **RPIC(s)**, in alphabetical order, by location;
- List terminated employees since last Quarterly Report;
- Attach Legal Dispositions and explanations for checked Felony or Misdemeanor answers;
- Attach ONE check payable to the Idaho Department of Finance for the total fees due (\$20 for **each active** Agent including the RPIC you are registering for the renewal);
- The Annual Report form may be copied or downloaded and reproduced as needed; be sure the form is signed.

IDAHO COLLECTION AGENCY ACT Idaho Code §26-2240: *Each applicant for a license under this act, with its initial license application, and each licensee at annual renewal, shall file with the director a list of all agents including the name of each agent and any other identifying information the director may require. A fee of twenty dollars (\$20.00) for each listed agent shall accompany the list. Each licensee shall notify the director in writing of any additions to its agent list no less often than every calendar quarter. A fee of twenty dollars (\$20.00) shall be paid to the director for each additionally identified agent in the quarterly notification of additions to a licensee's agent list. An agent is not required to be listed, nor the fee paid therefor, unless the agent acted for the licensee for more than thirty (30) business days.*

If you have any questions, please feel free to contact the licensing administrative assistant at 208-332-8085.

☛ UNITED STATES –
###-##-#### (SSN)

☛ CANADA –
###-###-### (SIN)

☛ INDIA –
LLLL####L (PAN)

☛ PHILLIPINES –
##-#####-# OR
#####-# (TIN)

☛ WEST INDIES –
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☛ MEXICO –
LLLL#####LLLLL##
(CURP)

☛ HONDURAS
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= NUMBER L= LETTER

Social Security Number
or Other Country
Equivalent



ENFORCEMENT ACTIONS

November 1 , 2011 through May 31, 2012

COLLECTION AGENCIES, DEBT/CREDIT COUNSELORS, DEBT BUYERS, CREDIT REPAIR COMPANIES

AVADANIAN & ADLER, LLC (Boca Raton, Florida) – November 2, 2011 – Administrative complaint issued to revoke Avadanian’s collection agency license due to its failure to maintain a surety bond pursuant to the Idaho Collection Agency Act. Avadanian failed to timely file an answer to the Department’s complaint, and on November 2, 2011, the Department issued a default order revoking Avadanian’s Idaho collection agency license.

DTA SOLUTIONS, LLC formerly known as FASLO SOLUTIONS, LLC (Watauga, Texas) –December 1, 2011 – Consent order issued addressing violations of the Idaho Collection Agency Act. Although the company contended that the violations alleged in the consent order were neither willful nor intentional, the company paid \$11,000 to the Department constituting penalties, investigative costs, and attorney fees. Later, the company applied for and was granted an Idaho collection agency license.

BEACON DEBT SOLUTIONS, INC. (Irvine, California) – December 13, 2011 – Order to Cease and Desist issued against Beacon Debt Solutions for operating a debt settlement business in Idaho without the license required by the Idaho Collection Agency Act.

CAMBRIDGE HUXLEY & ASSOCIATES, LLC (Amherst, New York) – February 13, 2012 – Order to Cease and Desist issued against Cambridge Huxley & Associates, LLC for operating a collection agency business in Idaho without the license required by the Idaho Collection Agency Act and for making numerous misrepresentations about the alleged debts owed, including the threat that failure to pay the alleged debts would result in felony criminal charges.

THE CREDIT PROS INTERNATIONAL CORPORATION (Newark, New Jersey) – March 30, 2012 – Consent order issued addressing violations of the Idaho Collection Agency Act. The company refunded to all Idaho residents the fees collected for its credit repair services and paid \$1,000 to the Department constituting penalties, investigative costs, and attorney fees.



REGULATED LENDERS, TITLE LENDERS AND PAYDAY LENDERS

T & L BROKERAGE, INC., dba TLC CHECK CASHING (Emmett, Idaho) – February 29, 2012 – Administrative complaint issued to revoke T & L Brokerage’s payday lender license due to

the company’s misrepresentations to the Department in its payday lender renewal application that it maintained at least \$30,000 in liquid assets on a continuing basis. Such misrepresentation demonstrated that the company lacked the financial responsibility, character, and fitness necessary to warrant the belief that it would engage in the payday lending business honestly and fairly, within the purposes of the Idaho Credit Code. Further, the company’s failure to maintain, on a continuing basis, \$30,000 in liquid assets also justified the Director in denying its license application. T & L Brokerage failed to timely file an answer to the Department’s complaint, and on February 29, 2012, the Department issued a default order revoking T & L Brokerage’s Idaho payday lender license.



MORTGAGE LOAN ORIGINATORS

WILLIAM CHARLES RANDAL (Spokane, Washington) – January 9, 2012 – Order denying Mr. Randal’s request for a mortgage loan originator license based on financial related requirements of the SAFE Act. Mr. Randal did not request a hearing on the matter, and on January 9, 2012, the denial order became a final order of the Director.

AUDREY P. D’ORAZIO (Nampa, Idaho) – February 6, 2012 – Order denying Ms. D’Orazio’s mortgage loan originator renewal application based on her application and based on financial related requirements of the SAFE Act. On March 5, 2012, Ms. D’Orazio appealed the order and the matter is pending.

MARY ELIZABETH ANNE SPERRY (Nampa, Idaho) – March 28, 2012 – Order denying Ms. Sperry’s mortgage loan originator renewal application based on financial related requirements of the SAFE Act. Ms. Sperry did not request a hearing on the matter, and on March 28, 2012, the denial order became a final order of the Director.





**Idaho Department
of Finance**



**USPS
(Regular Mail)**

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

OVERNIGHT DELIVERY

IDAHO DEPARTMENT OF FINANCE
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Phone:
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Consumer Finance Bureau:
(208) 332-8002

Facsimile:
(208) 332-8096

Toll Free in Idaho:
888-346-3378

Website:
<http://finance.idaho.gov>

Email Contacts
mortgage@finance.idaho.gov
or **NEW!!**
mlo@finance.idaho.gov



“The Niagara of the West—Shoshone Falls

This newsletter is produced semi-annually as a part of the Consumer Finance Bureau’s continued communication outreach with the companies it regulates. Delivery is provided by electronic notification of its availability on the Department’s website at <http://finance.idaho.gov>.

Suggestions and comments concerning the newsletter or its contents should be sent to the Bureau at PO Box 83720, Boise, Idaho 83720-0031 or via email to kc.schaler@finance.idaho.gov

IMPORTANT DATES TO REMEMBER!

Annual License Renewals

Last Date to Complete

Collection Agencies	March 15 th
Escrow/1031 Exchange Companies	April 30 th
Regulated Lenders (includes payday and title lenders)	May 31 st
Mortgage Brokers/Lenders	December 31st
Mortgage Loan Originators	December 31st

Annual Reporting of Activity

Final Date To File

Collection Agencies	March 15 th
Mortgage Brokers/Lenders Call Reports	Qtr1-May 15 th
	Qtr2—August 14th
	Qtr3—November 14th
	Qtr4—February 14th
Escrow/1031 Exchange Companies	April 30 th
Regulated Lenders	May 31 st

*Idaho Collection Agency Quarterly Agent Report filings are due on June 15, **September 15** and **December 15**. These should be filed **as close to the 15th** as possible to report accurate hiring additions and terminations **as of that date**—not weeks in advance or after. ***Please mark your calendar.***

Please make a note on your Calendar