



State of North Dakota  
**DEPARTMENT  
of FINANCIAL  
INSTITUTIONS**

DiscoverND.com/dfi

**Volume 1**

**No. 2**

**January 2002**

### NOTES FROM THE COMMISSIONER



As I look back on the year 2001, I am sure I am no different than all of you in that the events of September 11th will leave a lasting impression on all our lives. My sincere prayers go out to all the families, fire fighters, policemen, and other emergency personnel that have been affected by this tragic event. I am

also very proud and thankful for the way the financial institutions industry withstood this severe attack on America and continued to carry out America's financial matters with a very minimal disruption to the industry.

Although the final numbers are not in, it appears the financial industry has weathered a never before precedent, a 3¼% decrease in interest rates in a period of only 12 months. Although margins have been somewhat impacted, it appears bank earnings will continue to be strong for the entire 2001 year. I believe this is a direct reflection of the management skills in our industry. On a side note, I have taught many bank simulation courses over the past several years, and know from experience that when the students face a 2 to 2½% reduction in rates in the same year, they feel this is an unlikely event that they will not have to face in the real world. I guess we will have

to increase this reduction even more sharply in the future.

As you will notice in the enclosed flyer in this Newsletter, the Department has scheduled its "Day with the Commissioner" for January 30, 2002, for the bank industry, and January 31, 2002, for the credit union industry. I have invited Governor John Hoeven to speak on the farm program and update us on any other pertinent issues, and will also have guest speakers from the federal regulators pertaining to the respective industries. The Department feels these will be information packed days for the industries, and will also give you a chance to meet Department staff and visit with your peers. I would encourage all management of state and national banks and credit unions to attend this seminar.

Lastly, I received Senate confirmation for my position as Commissioner for the Department of Financial Institutions on November 28, 2001. Because the Senate is required to confirm certain positions which are appointed by the Governor at the next Legislative Session, it was ruled by the Attorney General that a special session would be considered the next Legislative Session and confirmation was necessary. I again thank you all for your support and look forward to seeing you on January 30th and 31st.



#### MEETINGS AND MINUTES OF STATE BANKING AND CREDIT UNION BOARDS

... located on our web site

[DiscoverND.com/dfi](http://DiscoverND.com/dfi)

[Banking Board](#)

[Credit Union Board](#)

## MJK CLEARING, INC. BANKRUPTCY

Recently, the Department of Financial Institutions became aware of the bankruptcy of MJK Clearing, Inc. ("MJK") when a banker called to inquire as to why he would have to take a write-down on his bank's securities being held for safekeeping by MJK. According to a press release from Stockwalk Group, Inc., the parent company of MJK, officials of Stockwalk notified the Securities and Exchange Commission and other regulators that MJK was in violation of the SECs net capital rules due to the failure of one of its clients being unable to meet a significant financial obligation. According to the press release, had the corporate client been able to meet its obligation to MJK, MJK would have been able to comply with the net capital rule. The bankruptcy of MJK resulted in the Securities Investor Protection Corporation (SIPC) stepping in and taking control of MJK. SIPC is reportedly investigating ways to find and recover the estimated \$60 million liability resulting from the inability of MJK's corporate client to meet its financial obligation.

Approximately 16 financial institutions in North Dakota had securities held for safekeeping with MJK and those assets have been frozen until the SIPC and the bankruptcy trustee determines both the volume of

customer assets and the extent of the liability resulting from the transaction resulting in the net capital rule violation. Preliminarily the financial institutions have been told that approximately 90 percent of the value of the securities can be released with the remaining 10 percent held until the extent of the loss is determined. The financial institutions may submit a claim to the bankruptcy trustee for the 10 percent "loss" which may or may not be covered by SIPC insurance.

What we have learned thus far is that apparently none of the financial institutions had safekeeping agreements with MJK; at this juncture it is not yet clear whether financial institutions are covered by SIPC insurance; and finally, that it is a fairly common occurrence for a brokerage firm to use customer assets as collateral for these stock lending transactions. During future examinations our staff will be looking at safekeeping agreements to determine if language in the agreement allows the third party to use the assets held for safekeeping as collateral for transactions as well as where the securities are being held for safekeeping.

---

## DEPARTMENT HIRES NEW EMPLOYEES



Lisa Fischer



Dawn Ystaas



Mitzi Bjorland



Troy Potter



Mike Martin

The Department of Financial Institutions has hired Lisa Fischer as an Administrative Assistant for the Consumer Division. Lisa previously worked for the Child Support Enforcement Agency, a division of the Department of Human Services. The Department also hired four new Financial Institutions Examiners. Dawn Ystaas and Mitzi Bjorland will be working with the Bismarck Examination Crew; and Troy Potter and Mike Martin will be working with the Minot Examination Crew.

Dawn Ystaas graduated from the University of North Dakota, with a major in Accounting and a minor in Office Administration. Mitzi Bjorland graduated from Minot State University, with a major in Finance and a minor in Accounting. Troy Potter graduated from Minot State University, with a major in Management. Mike Martin graduated from Minot State University, with a major in Finance.

We welcome these new employees, and excited to have them as part of the team at the Department of Financial Institutions.

## **NEW LEGISLATION LEGALIZES "PAYDAY LENDERS" IN NORTH DAKOTA**

Legislation introduced in the 2001 session now makes it legal for licensed businesses to make "payday loans." Prior to the 2001 legislative session, companies throughout North Dakota were making these types of short term loans without being regulated or licensed by this Department or any other regulatory agency. With the new rules and regulations set forth, it is now the responsibility of this Department to license, regulate, and examine deferred presentment service providers.

Deferred presentment service provider loans are intended to meet short-term cash needs and should not be used to meet long-term financial needs. A deferred presentment service transaction works in the following manner. A customer can present a check to a "payday" lender, receive cash in the amount of the check, less fees charged, and the lender will hold the check until an agreed upon date. Fees charged for these transactions can be up to 20 percent of the amount borrowed. Renewals of these transactions are allowed if the borrower does not have the funds available to satisfy the outstanding check at the agreed upon date. The length of the renewal must be a minimum of 15 days with the total number of days for the entire transaction not exceeding 45 days.

When a customer obtains a "payday" loan, the licensee usually only requires the customer's last pay stub, their most recent bank statement, and on occasion a utility bill. In most cases credit checks are not obtained, and documentation that is usually found for a conventional loan from a bank or credit union is not required. This process makes obtaining a loan very easy; however, it is also easy to get even further behind in your finances if this service is misused.

As of December 1, 2001, the Department had issued 64 deferred presentment service provider licenses. An applicant for a deferred presentment service provider license must meet several criteria. The following list illustrates the necessary items to become a licensed deferred presentment service provider:

1. Each applicant shall maintain unencumbered assets of at least \$25,000 per licensed location.
2. The financial responsibility, financial condition, business experience, character, and general fitness of the applicant must reasonably warrant the belief that the applicant's business will be conducted lawfully and fairly.

3. The owner and/or any principal cannot have been convicted of a felony.
4. Each applicant must maintain at least a \$20,000 surety bond and a larger bond may be required based on the dollar amount of the applicant's receivables.
5. Credit checks, criminal background checks, and fingerprint cards are required for principal shareholders and any managers.
6. An \$850 investigation and first year license fee are required with the application and there is an annual renewal fee of \$450.
7. A financial statement is required from the applicant and any person owning 25 percent or more of the company stock.
8. Copies of privacy policies and disclosure statements must be included with the application.
9. If the applicant is a corporation it must be registered with the North Dakota Secretary of State's office.
10. Photographs of the exterior and interior of the proposed location of the business are required to be submitted with the application.
11. A resume of the manager is also required with the application.

The above list is not all-inclusive, however it lists the major items the Department investigates prior to issuing a license.

The report of examination for deferred presentment service providers has been developed and examinations have begun. When conducting these examinations, the Department will be looking to ensure licensees are complying with North Dakota Century Code Chapter 13-08 and North Dakota Administrative Code Chapter 13-06. Samples of transactions that are active, renewed, and completed will be reviewed for compliance. The company's privacy and disclosure statements will be reviewed for accuracy and compliance as well.

If the current trend continues, North Dakota can expect to see more deferred presentment service provider licenses to be issued. As more people become aware of this type of service, the demand for these short-term loans may increase which may lead to more people venturing into the business. Many current licensees are also submitting applications to open multiple locations in the same city and in other cities across North Dakota. Licensees may have more than one business location; however, each location is treated separately with its own license.

# CONSUMER DIVISION GROWS DRAMATICALLY, TAKES ON NEW ISSUES AND RESPONSIBILITIES

By Greg Meidinger, Consumer Licensing Investigator/Examiner

The Department of Financial Institutions has experienced dramatic growth in the Consumer Division over the last six years. The Consumer Division is responsible for licensing and regulating collection agencies, consumer finance companies, deferred presentment service providers (payday lenders), money brokers, and sale of check providers. The largest number of issued licenses comes from the collection agencies and money brokers with total licenses issued as of June 30, 2001, equaling 220 and 267 respectively.

In the past, the Assistant Commissioner of the Department of Financial Institutions was responsible for this division. As the number of licenses issued continued to increase, the need for a full time person in the consumer division became apparent.

In August of 2001, I was hired to fill this position. I have been with the Department for about 16 months. Prior to this position, I was a bank examiner assigned to the Bismarck crew. I view this position as a new opportunity with many challenges ahead.

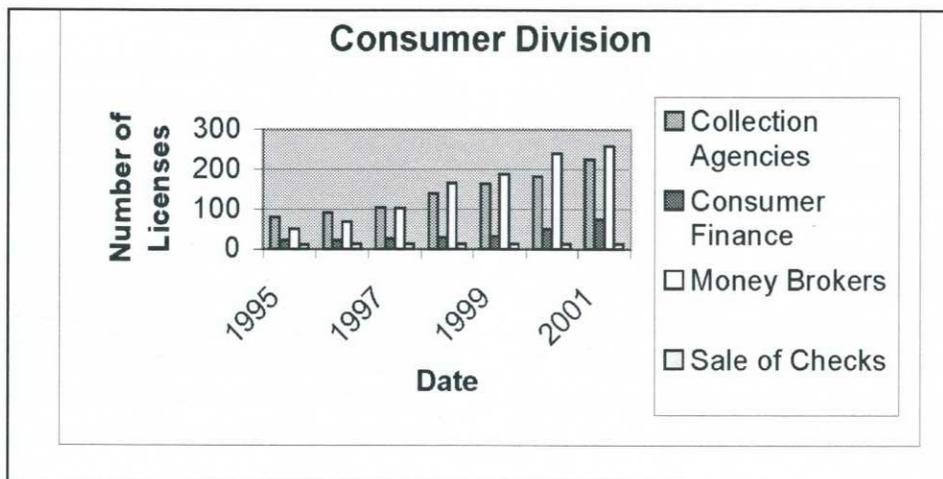
Currently, I have a number of issues I am addressing. The major issues are formulating reports of examination for deferred presentment service providers and out of state collection agencies. Both of these reports of examination will be new to the Department. Out of state collection agencies have been around for quite some time, however have not been examined by our Department. It is my intention to conduct most of the out of state collection agency examinations through mail which will be much less time consuming and inexpensive compared to on site examinations.

My goal is to have the reports of examination completed in early December, 2001 and begin examinations upon completion of the reports.

Other issues I will be facing include updating current rules and regulations for money brokers, collection agencies, and consumer finance companies; updating the consumer finance company report of examination; and the day to day activities such as answering consumer questions and complaints.

To put into perspective the growth the Department has experienced in the Consumer Division, as of June 30, 1980, the Department had a total of 76 licensed entities. As of June 30, 2001, there were 558 total licensed entities in the State. The number of money broker licenses issued has increased the most going from 1 license as of June 30, 1980, to 267 licenses as of June 30, 2001. Collection agency licenses grew from 36 licenses to 225 licenses in the same time period. Consumer finance companies and sale of check providers have not experienced the same growth as have the money brokers and collection agencies. As of June 30, 1980, there were a total of 32 consumer finance companies and 7 sale of check providers. As of June 30, 2001, those numbers increased to 74 and 14 respectively. I am expecting the number of money broker licenses to continue to increase with the current low mortgage rates. Collection agency licenses also seem to steadily increase as applications for new licenses come in on a regular basis.

The following table depicts these numbers and illustrates the dramatic increases in the number of licenses issued.



**Report No. 318**  
**Abstract of Consolidated Statement of Condition of**  
**All State Banking Institutions, Trust Companies and Bank of North Dakota**  
**For Call September 30, 2001**  
(In thousands of Dollars)

<b>Assets</b>	<b>92 State Banks</b>	<b>3 Trusts</b>	<b>Bank of North Dakota</b>	<b>Total Reporting</b>
Cash & balance due from depository institution:				
Noninterest-bearing balance and currency and coin	\$181,670	\$34	\$153,691	\$335,395
Interest-bearing balances	\$40,299	\$999		\$41,298
Securities	\$1,286,799	\$1,550	\$341,210	\$1,629,559
Federal funds sold and securities purchased/agreements to sell	\$212,508		\$203,085	\$415,593
Loans & lease financing receivables:				
Loans & leases held for sale	\$14,378			\$14,378
Loans & leases net of unearned income	\$4,173,568		\$1,264,896	\$5,438,464
Less: Allowance for loan & lease losses	<u>\$64,883</u>		<u>\$23,301</u>	<u>\$88,184</u>
Loans & leases, unearned income, allowances & reserve	\$4,108,685		\$1,241,595	\$5,350,280
Trading Assets				
Premises & fixed assets (including capitalized leases)	\$90,488	\$365	\$2,677	\$93,530
Other real estate owned	\$4,706	\$585	\$45	\$5,336
Investments in unconsolidated subsidiaries & assoc. companies	\$153			\$153
Intangible assets	\$20,200		\$3,828	\$24,028
Goodwill	\$18,689			\$18,689
Other Intangible assets	\$1,511		\$3,828	\$5,339
Other assets	<u>\$167,705</u>	<u>\$1,653</u>	<u>\$42,092</u>	\$211,450
<b>Total Assets</b>	<u>\$6,127,591</u>	<u>\$5,186</u>	<u>\$1,988,223</u>	<u>\$8,121,000</u>
<b>Liabilities</b>				
Deposits:				
In domestic offices				
Noninterest-bearing	\$581,984		\$138,260	\$720,244
Interest-bearing	<u>\$4,601,457</u>		<u>\$1,128,454</u>	<u>\$5,729,911</u>
Federal funds purch & secur sold under agreements to repurchase	\$69,691		\$203,713	\$273,404
Trading Liabilities				
Other borrowed money	\$189,246	\$111	\$320,608	\$509,965
Bank's liability on acceptances executed and outstanding				
Subordinated notes and debentures	\$479			\$479
Other liabilities	<u>\$82,138</u>	<u>\$478</u>	<u>\$26,060</u>	<u>\$108,676</u>
<b>Total Liabilities</b>	\$5,524,995	\$589	\$1,817,095	\$7,342,679
Minority interest in consolidated subsidiaries	\$660			\$660
<b>Equity Capital</b>				
Perpetual preferred stock	\$500			\$500
Common Stock	\$37,361	\$787	\$2,000	\$40,148
Surplus	\$256,693	\$344	\$42,000	\$299,037
Retained earnings	\$287,229	\$2,819	\$126,310	\$416,358
Accumulated other comprehensive income	\$20,153		\$818	\$20,971
Other equity capital components		<u>\$647</u>		<u>\$647</u>
<b>Total Equity Capital</b>	<u>\$601,936</u>	<u>\$4,597</u>	<u>\$171,128</u>	<u>\$777,661</u>
<b>Total Liabilities and Equity Capital</b>	<u>\$6,127,591</u>	<u>\$5,186</u>	<u>\$1,988,223</u>	<u>\$8,121,000</u>

<b>Average Ratios of State Banking Institutions</b>	<b>9/30/2001</b>	<b>6/30/2001</b>	<b>3/31/2001</b>	<b>12/31/2000</b>	<b>9/30/2000</b>
<b>Total Capital/Reserves to Total Assets</b>	10.15%	10.21%	10.00%	10.14%	10.29%
<b>Total Capital to Total Deposits</b>	11.61%	11.45%	11.07%	11.04%	11.13%
<b>Total Loans to Total Assets</b>	67.63%	68.44%	63.52%	64.98%	66.71%
<b>Loan Valuation Res to Total Loans (Gross)</b>	1.55%	1.56%	1.65%	1.63%	1.62%
<b>Total Loans to Total Deposits</b>	80.52%	81.54%	74.27%	76.71%	80.31%
<b>Return on Assets (Annualized)</b>	1.12%	1.16%	1.12%	1.09%	1.18%
<b>Increase in Deposits 9-30-00 to 9-30-01</b>	10.34%				
<b>Increase in Loans 9-30-00 to 9-30-01</b>	11.01%				
<b>Increase in Total Assets 9-30-00 to 9-30-01</b>	9.54%				

## BANK PERFORMANCE FOR THIRD QUARTER 2001

Preliminary results for the 3rd quarter of 2001 for North Dakota state-chartered banks looks good compared to the results reported by the Federal Deposit Insurance Corporation, for the banking industry as a whole. Net income for the quarter was \$16,600,000 up from \$16,257,000 for the same quarter last year. Quarterly net income was up 2 percent compared to a nearly 10 percent decline on the national level. The total net income for the 3rd quarter was \$50,450,000 compared to \$49,537,000 for the same period last year. The net income translates into a return on average assets of 1.13% compared to 1.23% for the same quarter last year; however, the average assets for banks in that same year has grown nearly 11 percent while net income grew only 2 percent. The decline in the ROA is consistent with banks across the nation.

Provisions for loan losses in the third quarter were slightly over \$5 million and represented just over 30 percent of net income for the quarter. Provisions for the same quarter in 2000 were just over \$3,600,000 and represented 22 percent of net income. The increase in provisions was 38 percent compared to 71 percent for the industry as a whole. The allowance

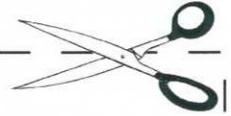
for loan and lease losses grew \$887,000 in the third quarter and represents 1.55 percent of total loans compared to 1.62 percent a year earlier. Gross loans grew over 8 percent in that time frame compared to a 3.4 percent increase in the allowance in the one year period. Net loan charge offs in the quarter was approximately \$4.4 million and was primarily from lease financing receivables and commercial and industrial loans.

The capital for North Dakota banks continues to evidence strength as total capital grew by more than \$15 million in the quarter. The ratio of primary capital to average assets declined slightly from 10.23 percent in the June 2001 quarter to 10.18 percent in the quarter ending September 30, 2001. The decline is attributed primarily to the significant asset growth which is the norm for the third quarter given the agricultural operating season.

Overall North Dakota's state-chartered banks continue to grow and operate profitably. North Dakota's banks have consistently maintained higher capital ratios and evidence strength to withstand the adversities of a weakening economy.

### DAY WITH THE COMMISSIONER

#### Registration form



**Wednesday**  
**January 30, 2002**  
**Banks**

**Thursday**  
**January 31, 2002**  
**Credit Unions**

Number of people attending \_\_\_\_\_

Number of people attending \_\_\_\_\_

From \_\_\_\_\_  
(Name of Bank)

From \_\_\_\_\_  
(Name of Credit Union)

@ \$25.00 per person = \$\_\_\_\_\_ enclosed

@ \$25.00 per person = \$\_\_\_\_\_ enclosed

Please print the names of those attending. We will have name tags available at the time of registration.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please return by January 23, 2002, to: Department of Financial Institutions  
2000 Schafer Street, Suite G  
Bismarck ND 58501-1204

## E-COMMERCE AND HOME BANKING

Several credit unions are either offering a Home Banking product to their members or are in the process of choosing a Home Banking product. Advances in technology and member demand make Home Banking a valuable service for credit unions. The Department of Financial Institutions is committed to seeing that the Home Banking product is offered in a secure environment.

With these rapid advances in technology, credit union management needs to ensure that the security risks in offering such a program as Home Banking are addressed and are continuously monitored. Since Home Banking is a web based product that accesses a credit union's database, credit unions that offer this product need to be aware that their database is now potentially open to anyone in the world with the ability to hack into their system. The types of attacks are numerous and are constantly changing. Having a firewall helps to reduce these risks, but attackers have tools available that can discover access paths through the router and firewall. Additional vulnerabilities are due to firewalls being misconfigured or not adequately monitored. Once an attacker can get through the firewall, he can obtain root access to your system.

Most credit unions outsource their technology services to vendors such as an Internet Service Providers (ISP), a Web Host, and/or an Application Service Provider (ASP). It is the board of directors and management's responsibility to oversee these vendor relationships to ensure the risks associated with these technology services are being properly addressed. For the ISP and the Web Host, there needs to be a clear understanding (a contract) that addresses both the credit union's and the service provider's responsibility for providing network security, network performance, and availability. This contract should address who has responsibility for identifying potential threats, implementing the necessary protective measures, what network support is available, and who has responsibility for the connectivity and the connectivity components (routers, CSU/DSU, etc.). For the Application Service Provider, management needs to have a clear understanding of how the applications are developed and maintained, how these applications are accessed, how session management controls operate, and how regulatory compliance issues are addressed.

Technology service contracts should address the scope of services, the cost and duration, security and confidentiality, the audit and control function, perfor-

mance standards, indemnification to hold both the credit union and the service provider harmless, any limitation of liability, a dispute resolution clause resolve problems quickly, termination rights, and a prohibition of the assignment of the contract without the credit union's permission. The contract should specify that the service provider and its agents are prohibited from using or disclosing member information to any party other than the credit union or its regulator / share insurer. The contract should also specify the types of audit reports on the service provider the credit union will receive, the frequency of those audits, and the right of the credit union to obtain documentation pertaining to the resolution of any deficiencies noted in the audit.

Proper Service Provider oversight should include a review of the financial condition and operations of the Service Provider by credit union management. Credit union management should also review the quality of service and support from the Service Provider, contract compliance, access to the credit union's system, and business contingency plans.

The advancements in technology have opened up a whole new world of risk to credit unions. Overseeing vendor relationships and vendor contracts a only two of several areas that need to be addressed by credit union management. It is the Department's goal to strengthen credit union awareness of these risks and help credit unions mitigate these risks. We will do this through forums such as this newsletter and the "Day with the Commissioner", as well as the examination process. We have adopted the NCUA EC-1 and EC-2 checklists and will make e-Commerce a priority in the examination process.



**Please change your records...**

...we have a 'New Name'

and

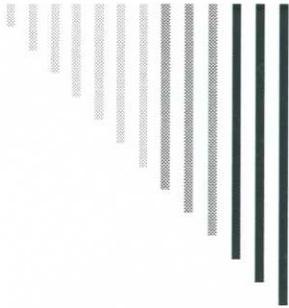
'New Commissioner'

We are now:

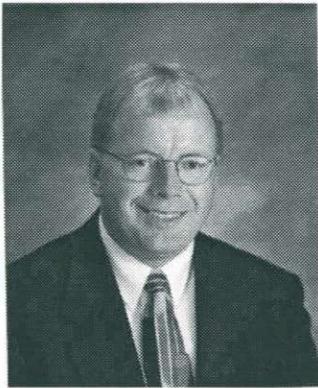
**The Department of Financial Institutions**  
Commissioner Timothy J. Karsky

2000 Schafer Street, Suite G  
Bismarck, North Dakota 58501-1204

701-328-9933  
[www.DiscoverND.com/dfi](http://www.DiscoverND.com/dfi)



State of North Dakota  
**DEPARTMENT**  
*of* **FINANCIAL**  
**INSTITUTIONS**



# Day with the Commissioner

*for* **Banks - Wednesday, January 30, 2002**

Speakers from FDIC, Federal Reserve and OCC

*for* **Credit Unions - Thursday, January 31, 2002**

Speaker from NCUA

\*\*\*\*\*

**Governor John Hoeven has been invited to address each group.  
Topics will include: Privacy, Industry Trends and Current Events**

\*\*\*\*\*

**Radisson Inn**

**9:00 am - 3:00 pm**

**Registration Fee: \$25**

**Registration Deadline: January 25, 2002**

**(Registration form included in this newsletter.)**

**DEPARTMENT OF FINANCIAL INSTITUTIONS STAFF**

Timothy J. Karsky .....	Commissioner.....	328-9933
Robert J. Entringer .....	Assistant Commissioner.....	328-9936
Vacant.....	Chief Examiner - Banks.....	328-9933
James M. Laidlaw .....	Chief Examiner - Credit Unions.....	328-9933
Lori L. Laschkewitsch .....	Director of Administration and Information Technology.....	328-9933
Greg Meidinger.....	Consumer Licensing Investigator/Examiner.....	328-9933
Wayne Hatzenbuehler .....	Credit Union Examiner.....	328-9933
Suzette Richardson .....	Administrative Assistant (Bank/Credit Union).....	328-9933
Lisa Fischer .....	Administrative Assistant (Licensing/Consumer).....	328-9934
Scott Miller.....	Assistant Attorney General.....	328-2100

**Bismarck Examination Crew**

Doug Grenz, Supervising Examiner  
 Monte Wolf, FI Examiner II  
 Dawn Ystaas, FI Examiner I  
 Mitzi Bjorland, FI Examiner I

**Fargo Examination Crew**

Dave Lessard, Supervising Examiner  
 Joe Banister, FI Examiner III  
 Mike George, FI Examiner III  
 Mike Aschauer, FI Examiner

**Minot Examination Crew**

Doug Grenz, Supervising Examiner  
 Craig Marsh, FI Examiner III  
 Mike Martin, FI Examiner II  
 Troy Potter, FI Examiner I

**Grand Forks Examination Crew**

Doug Hoselton, Supervising Examiner  
 Vacant, FI Examiner  
 Tom Metelmann, FI Examiner I

**STATE BANKING BOARD**

Dee Ann Baertsch .....	First State Bank of Golva.....	Golva.....	872-3656
Ronald Braseth.....	The Goose River Bank.....	Mayville.....	786-3110
Bill Daniel.....	Public Member.....	Bismarck.....	223-8488
Launa Moldenhauer.....	Kirkwood Bank & Trust Co.....	Bismarck.....	258-6550
Gary Petersen .....	Lakeside State Bank.....	New Town.....	627-4717
Terry Zeltinger .....	United Community Bank of ND.....	Minot.....	839-3500

**STATE CREDIT UNION BOARD**

Charles Gates .....	Director - Area Community CU.....	Grand Forks.....	772-5029
Judy Millar .....	Public Member.....	West Fargo.....	282-4692
Ervin Mund .....	St. Alexius Medical Center CU.....	Bismarck.....	530-7189
Steven Tonneson .....	Prairie Federal CU.....	Minot.....	837-5353

PRESORTED  
 STANDARD  
 US POSTAGE PAID  
 BISMARCK ND  
 PERMIT NO. 386

OFFICIAL MAIL, State of North Dakota RETURN SERVICE REQUESTED

2000 Schafer Street, Suite G • Bismarck, ND 58501-1204  
**DEPARTMENT of FINANCIAL INSTITUTIONS**  
 State of North Dakota

