

# College **SAVE**<sup>TM</sup>

Bank of North Dakota's 529 Plan

(A Fiduciary Fund of the State of North Dakota)

**BASIC FINANCIAL STATEMENTS**

**December 31, 2024 and 2023**

**and**

**SUPPLEMENTARY INFORMATION**

**December 31, 2024**

**(With Independent Auditor's Report Thereon)**

# College **SAVE**<sup>TM</sup>

Bank of North Dakota's 529 Plan  
(A Fiduciary Fund of the State of North Dakota)

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## INDEPENDENT AUDITOR'S REPORT

Bank of North Dakota and  
Ascensus Broker Dealer Services, LLC  
College SAVE

### Report on the Audit of the Basic Financial Statements

#### ***Opinion***

We have audited the accompanying statements of fiduciary net position and statements of changes in fiduciary net position of **College SAVE** (the Plan) as of and for the years ended December 31, 2024 and 2023, and the related notes to the financial statements, which collectively comprise the Plan's basic financial statements.

In our opinion, the basic financial statements present fairly, in all material respects, the fiduciary net position of the Plan as of December 31, 2024 and 2023, and the changes in its fiduciary net position for the years then ended in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP).

#### ***Basis for Opinion***

We conducted our audits in accordance with auditing standards generally accepted in the United States of America (U.S. GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Basic Financial Statements* section of our report. We are required to be independent of the Plan and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

#### ***Emphasis of Matter – Other***

As disclosed in Note 1, the Plan is included in the state of North Dakota's financial reporting entity as a fiduciary fund. The assets of the Plan are held in the College SAVE Trust (the Trust). These basic financial statements present only the activities and balances attributable to the Plan and do not purport to, and do not, present fairly the fiduciary net position or changes in fiduciary net position of the Trust or any other fiduciary funds of the state of North Dakota as of and for the years ended December 31, 2024 and 2023. Our opinion is not modified with respect to this matter.

## **Report on the Audit of the Basic Financial Statements (*Continued*)**

### ***Responsibilities of Management for the Basic Financial Statements***

Management is responsible for the preparation and fair presentation of the basic financial statements in accordance with U.S. GAAP, and for the design, implementation and maintenance of internal control relevant to the preparation and fair presentation of basic financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the basic financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Plan's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

### ***Auditor's Responsibilities for the Audit of the Basic Financial Statements***

Our objectives are to obtain reasonable assurance about whether the basic financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not absolute assurance, and therefore is not a guarantee that an audit conducted in accordance with U.S. GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the basic financial statements.

In performing an audit in accordance with U.S. GAAS and *Government Auditing Standards*, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the basic financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the basic financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Plan's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the basic financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Plan's ability to continue as a going concern for a reasonable period of time.

We are required to communicate to those charged with governance regarding, among other matters, the planned scope and timing of the audits, significant audit findings and certain internal control-related matters that we identified during the audits.

Bank of North Dakota and  
Ascensus Broker Dealer Services, LLC  
College SAVE

## **Report on the Audit of the Basic Financial Statements (*Continued*)**

### ***Required Supplementary Information***

U.S. GAAP requires that management's discussion and analysis on pages 7 through 14 be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board as it is considered to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic or historical context. We have applied certain limited procedures to the required supplementary information in accordance with U.S. GAAS, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

### ***Supplementary Information***

Our audits were conducted for the purpose of forming an opinion on the Plan's basic financial statements. The schedules of fiduciary net position and changes in fiduciary net position by investment option on pages 40 through 43 are presented for purposes of additional analysis and are not a required part of the basic financial statements. These schedules are the responsibility of management and were derived from and relate directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the 2024 basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with U.S. GAAS. In our opinion, the information in these schedules is fairly stated, in all material respects, in relation to the basic financial statements as a whole.

### **Other Reporting Required by *Government Auditing Standards***

In accordance with *Government Auditing Standards*, we have also issued our report dated March 31, 2025, on our consideration of the Plan's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Plan's internal control over financial reporting and compliance.

A handwritten signature in black ink that reads "Landmark PLC". The signature is written in a cursive, flowing style.

Little Rock, Arkansas  
March 31, 2025

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**Management's Discussion and Analysis**  
**(Unaudited)**

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# College SAVE™

Bank of North Dakota's 529 Plan  
(A Fiduciary Fund of the State of North Dakota)

## MANAGEMENT'S DISCUSSION AND ANALYSIS (Unaudited) December 31, 2024 and 2023

This management's discussion and analysis is intended to provide readers an objective discussion of the basic financial statements of College SAVE (the Plan) as of and for the years ended December 31, 2024, 2023 and 2022. This discussion and analysis, which is supplementary information required by the Governmental Accounting Standards Board (GASB), is intended to provide a highly summarized overview of the Plan's assets, liabilities, fiduciary net position and changes in fiduciary net position and should be read in conjunction with the Plan's financial statements and notes thereto, which are included on pages 17 through 37. In addition, readers may find useful the supplementary information on pages 40 through 43, which include information about the investment options offered to account owners.

\* \* \* \* \*

College SAVE was established in September of 2000 to encourage the investment of funds to be used for qualified higher education expenses at eligible institutions, as authorized under North Dakota Century Code Title 6, Chapter 9, Section 38. Plan assets are held for the benefit of account owners and their designated beneficiaries in the College SAVE Trust (the Trust), for which the Bank of North Dakota (the Bank) serves as Trustee. The Plan is administered as a "qualified tuition program" in compliance with Section 529 of the Internal Revenue Code of 1986, as amended, and both the Plan and the Trust are exempt from federal taxation.

The Bank has established rules to administer, manage, promote and market the Plan, which are set forth in North Dakota Administrative Code Title 12.5, Article 2, Chapter 1. As allowed under these rules, the Bank may contract with third-party service providers to perform administrative duties related to the Plan and to manage the Plan's investments.

Pursuant to the College SAVE Plan Management Agreement, as amended, Ascensus Broker Dealer Services, LLC (ABD) serves as the Plan Manager, and Ascensus College Savings Recordkeeping Services, LLC (ACSR) serves as the recordkeeping and servicing agent. Collectively, ABD and ACSR are referred to as "Ascensus Government Savings (AGS)." The Vanguard Group, Inc. (Vanguard) provides investment advisory and related administrative services.

### Financial Highlights

The following highlight some of the Plan's key financial results:

- At December 31, 2024, 2023 and 2022, the Plan's fiduciary net position totaled \$644.0 million, \$602.3 million and \$541.3 million, respectively. Fiduciary net position increased \$41.7 million, or 6.9%, from December 31, 2023, to December 31, 2024, after increasing \$61.0 million, or 11.3%, from December 31, 2022, to December 31, 2023.

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## MANAGEMENT'S DISCUSSION AND ANALYSIS (Unaudited) December 31, 2024 and 2023

### Financial Highlights (*Continued*)

- Withdrawals exceeded contributions by \$13.8 million, \$11.7 million and \$9.8 million for the years ended December 31, 2024, 2023 and 2022, respectively.
- Contributions during the years ended December 31, 2024, 2023 and 2022, totaled \$48.5 million, \$45.6 million and \$45.5 million, respectively. Contributions increased \$2.9 million, or 6.4%, from December 31, 2023, to December 31, 2024, after increasing \$96.9 thousand, or 0.2%, from December 31, 2022, to December 31, 2023.
- Withdrawals during the years ended December 31, 2024, 2023 and 2022, totaled \$62.3 million, \$57.4 million and \$55.4 million, respectively. Withdrawals increased \$5.0 million, or 8.7%, from December 31, 2023, to December 31, 2024, after increasing \$2.0 million, or 3.6%, from December 31, 2022, to December 31, 2023.
- Administrative fees totaled \$3.8 million, \$3.5 million and \$3.6 million for the years ended December 31, 2024, 2023 and 2022, respectively. These fees, which are based on the Plan's fiduciary net position, are paid to the Bank, AGS and Vanguard for performing oversight, administrative and investment duties.
- For the year ended December 31, 2024, the Plan experienced net investment income of \$59.3 million, resulting from the net increase in the fair value of investments of \$41.5 million and dividends, capital gain distributions and interest of \$17.8 million. For the year ended December 31, 2023, the Plan experienced net investment income of \$76.2 million, resulting from the net increase in the fair value of investments of \$60.2 million and dividends, capital gain distributions and interest of \$16.0 million. For the year ended December 31, 2022, the Plan experienced a net investment loss of \$92.5 million, resulting from the net decrease in the fair value of investments of \$104.8 million, somewhat offset by dividends, capital gain distributions and interest of \$12.3 million.
- The number of active accounts has increased from 52,933 at December 31, 2022, to 55,597 at December 31, 2023, to 58,224 at December 31, 2024. The average active account balance increased from approximately \$10.2 thousand at December 31, 2022, to approximately \$10.8 thousand at December 31, 2023, and further increasing to approximately \$11.1 thousand at December 31, 2024.
- BND Match awards totaling approximately \$137.7 thousand, \$155.4 thousand, and \$129.2 thousand in 2024, 2023 and 2022, respectively, were granted to qualifying account owners.
- New Baby Match awards totaling approximately \$242.4 thousand, \$222.9 thousand, and \$214.0 thousand in 2024, 2023 and 2022, respectively, were granted to qualifying account owners.
- Kindergarten Kickoff Match awards totaling approximately \$68.3 thousand, \$73.7 thousand and \$64.2 thousand in 2024, 2023 and 2022, respectively, were granted to qualifying account owners.

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## MANAGEMENT'S DISCUSSION AND ANALYSIS (Unaudited)

December 31, 2024 and 2023

### Overview of the Basic Financial Statements

The Plan's basic financial statements comprise the statement of fiduciary net position, the statement of changes in fiduciary net position and the related notes to the financial statements. The statement of fiduciary net position presents information on the Plan's assets and liabilities, with the difference between them representing net position held in trust for account owners and their beneficiaries. The statement of changes in fiduciary net position shows how the Plan's fiduciary net position changed during the year. The notes to the financial statements provide additional explanatory information about the amounts presented in the financial statements. It is essential that readers of this report consider the information in the notes to obtain a full understanding of the Plan's financial statements.

The Plan is included in the financial reporting entity of the state of North Dakota as a fiduciary fund. Assets are held in a trust for account owners and beneficiaries and cannot be used to support other governmental programs.

The Plan's basic financial statements are prepared in accordance with accounting and financial reporting standards for governmental entities set forth by the GASB. As required under generally accepted accounting principles applicable to fiduciary fund types, the Plan's basic financial statements are prepared using the accrual basis of accounting. Mutual funds are reported at fair value, and investment contracts are reported at contract value. All investment transactions are recorded on a trade-date basis. Realized and unrealized gains and losses are reported as "net increase (decrease) in the fair value of investments" on the statements of changes in fiduciary net position. Dividends and capital gain distributions are recorded on the ex-dividend date rather than when they are received. Contributions are recognized when they are received, provided enrollment in the Plan has been successfully completed, and withdrawals are recognized when the withdrawal request has been received and approved for payment. Administrative fees are recognized in the period when the related services are provided, regardless of when cash is paid.

### Financial Analysis

#### Fiduciary Net Position

The following condensed statements of fiduciary net position provide a "snapshot" of the overall financial position of the Plan:

	<u>December 31, 2024</u>	<u>December 31, 2023</u>	<u>December 31, 2022</u>
Total assets	\$ 645,754,190	\$ 603,611,061	\$ 542,865,229
Total liabilities	<u>1,747,739</u>	<u>1,309,381</u>	<u>1,544,991</u>
Net position held in trust for account owners and beneficiaries	<u>\$ 644,006,451</u>	<u>\$ 602,301,680</u>	<u>\$ 541,320,238</u>

# College **SAVE**<sup>TM</sup>

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## MANAGEMENT'S DISCUSSION AND ANALYSIS (Unaudited)

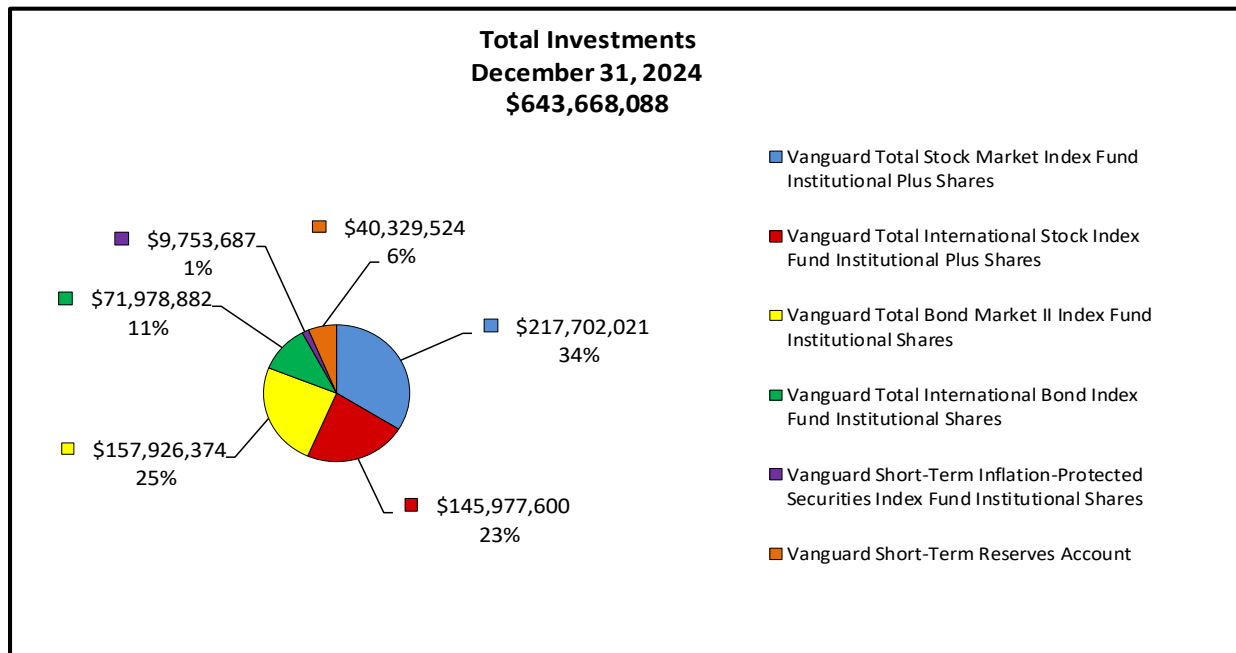
December 31, 2024 and 2023

### Financial Analysis *(Continued)*

#### Fiduciary Net Position *(Continued)*

The reported balance of net position held in trust for account owners and their beneficiaries represents the cumulative total of contributions since the Plan's inception, increased (decreased) by net investment income (loss), and decreased by withdrawals and administrative fees.

Investments, which totaled \$643.7 million, \$602.5 million, and \$541.7 million at December 31, 2024, 2023 and 2022, respectively, represent over 99% of the Plan's total assets. Account owners are able to direct investment of their contributions into one or more investment options and unit classes, each of which is invested in one or more Vanguard mutual funds or investment contracts (the Underlying Funds) in accordance with a predetermined asset allocation strategy approved by the Bank. At December 31, 2024, 2023 and 2022, the Plan's Underlying Funds are as follows:



**Note:** Percentages are stated as a percent of total investment value.

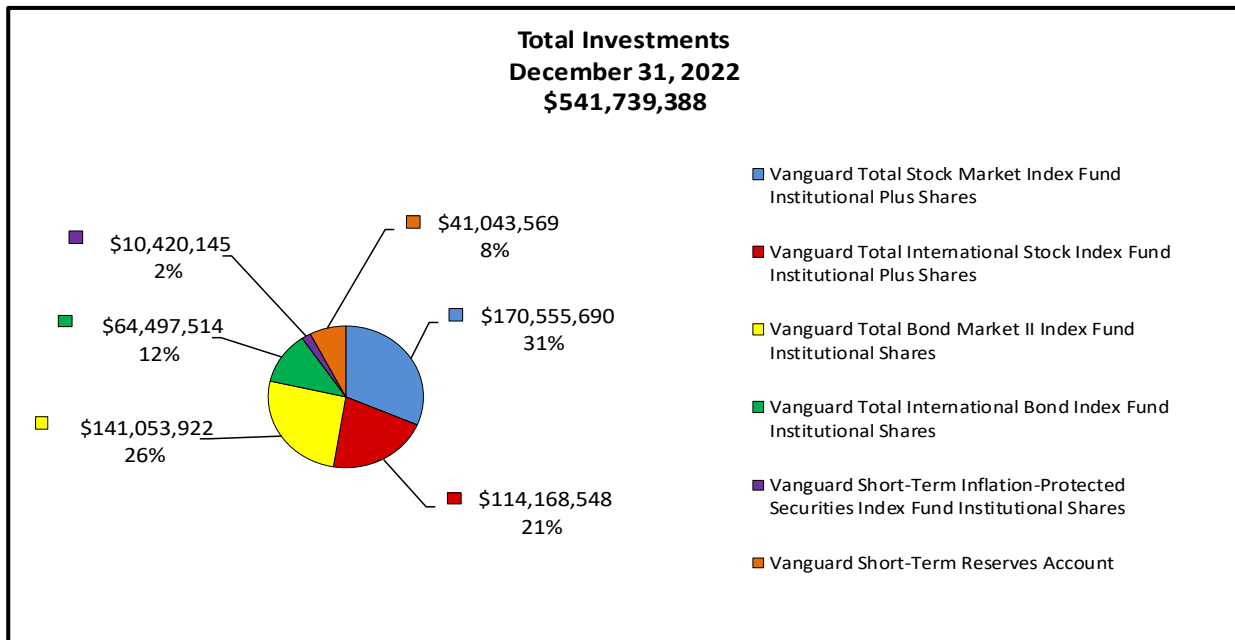
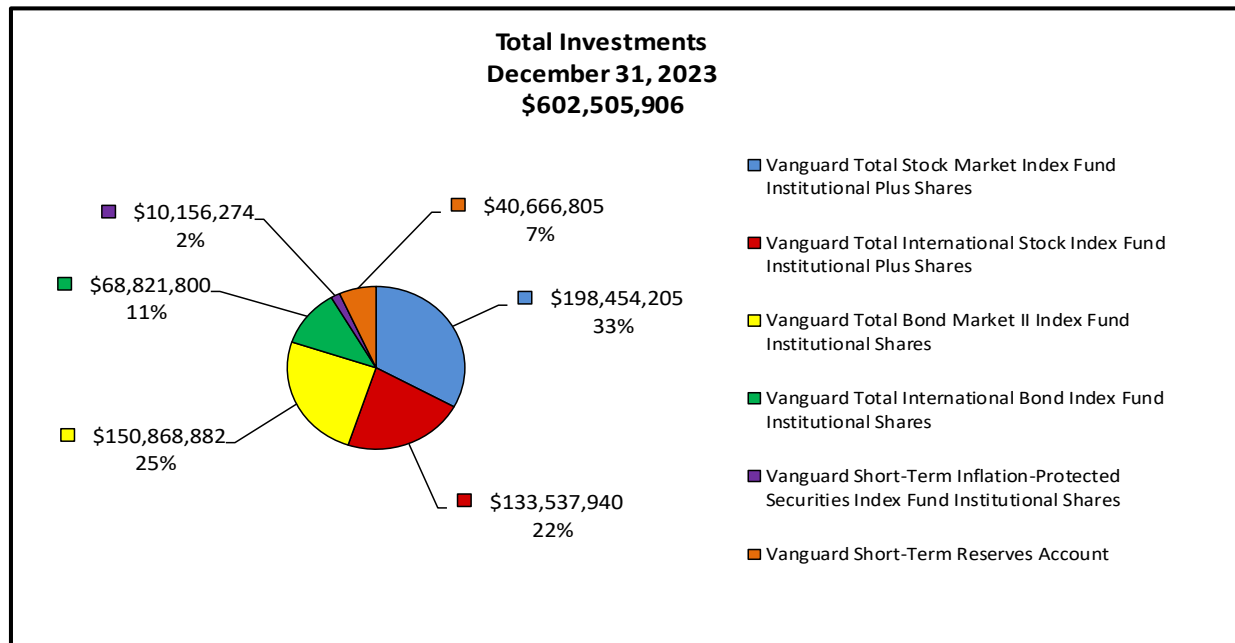
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## MANAGEMENT'S DISCUSSION AND ANALYSIS (Unaudited) December 31, 2024 and 2023

### Financial Analysis (Continued)

#### Fiduciary Net Position (Continued)



Note: Percentages are stated as a percent of total investment value.

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## MANAGEMENT'S DISCUSSION AND ANALYSIS (Unaudited) December 31, 2024 and 2023

### Financial Analysis (*Continued*)

#### Fiduciary Net Position (*Continued*)

Other assets, which totaled \$2.1 million at December 31, 2024, \$1.1 million at December 31, 2023 and \$1.1 million at December 31, 2022, comprise amounts to be invested or distributed on behalf of account owners and their beneficiaries and receivables for proceeds from Underlying Fund sales transactions. The Plan's liabilities, which totaled \$1.7 million at December 31, 2024, \$1.3 million at December 31, 2023 and \$1.5 million at December 31, 2022, comprise accrued administrative fees, payables for withdrawals approved but not yet paid and payables for Underlying Fund purchase transactions.

#### Changes in Fiduciary Net Position

The following statements of changes in fiduciary net position summarize how the Plan's net position held in trust for account owners and their beneficiaries changed during the years presented:

	<u>Year Ended</u> <u>December 31, 2024</u>	<u>Year Ended</u> <u>December 31, 2023</u>	<u>Year Ended</u> <u>December 31, 2022</u>
Contributions	\$ 48,529,661	\$ 45,631,896	\$ 45,535,022
Net investment income (loss)	59,330,637	76,217,001	(92,537,420)
Withdrawals	(62,329,496)	(57,357,966)	(55,381,845)
Administrative fees	<u>(3,826,031)</u>	<u>(3,509,489)</u>	<u>(3,586,782)</u>
Net increase (decrease)	41,704,771	60,981,442	(105,971,025)
Net position held in trust for account owners and beneficiaries, beginning of year	<u>602,301,680</u>	<u>541,320,238</u>	<u>647,291,263</u>
Net position held in trust for account owners and beneficiaries, end of year	<u>\$ 644,006,451</u>	<u>\$ 602,301,680</u>	<u>\$ 541,320,238</u>

# College SAVE™

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## MANAGEMENT'S DISCUSSION AND ANALYSIS (Unaudited) December 31, 2024 and 2023

### Investment Commentary

The following section provides a brief description of each of the Plan's investments. More complete information can be found in the *College SAVE Plan Disclosure Statement and Participation Agreement* document or in each mutual fund's prospectus and annual report.

The Vanguard Total Stock Market Index Fund Institutional Plus Share Class is passively managed, using index sampling. This fund invests in large-, mid- and small-capitalization stocks diversified across growth and value investment styles and seeks to track the performance of the CRSP U.S. Total Market Index. This fund experienced returns of 23.76%, 26.03% and (19.51%) for the years ended December 31, 2024, 2023 and 2022, respectively. The share price of this fund increased from \$174.63 at December 31, 2022, to \$216.65 at December 31, 2023, to \$264.58 at December 31, 2024.

The Vanguard Total International Stock Index Fund Institutional Plus Share Class employs an indexing investment approach and seeks to track the performance of the FTSE Global All Cap ex U.S. Index, which is designed to measure equity market performance in developed and emerging markets, excluding the United States. This fund experienced returns of 5.19%, 15.54% and (15.97%) for the years ended December 31, 2024, 2023 and 2022, respectively. The share price of this fund increased from \$111.44 at December 31, 2022, to \$124.53 at December 31, 2023, to \$126.75 at December 31, 2024.

The Vanguard Total Bond Market II Index Fund Institutional Share Class is passively managed, using index sampling and seeks to track the performance of the Bloomberg U.S. Aggregate Float Adjusted Index. This fund provides broadly diversified exposure to the entire U.S. investment grade bond market and is intermediate in duration. This fund experienced returns of 1.31%, 5.66% and (13.12%) for the years ended December 31, 2024, 2023 and 2022, respectively. The share price of this fund increased from \$9.37 at December 31, 2022, to \$9.59 at December 31, 2023, but decreased to \$9.36 at December 31, 2024.

The Vanguard Total International Bond Index Fund Institutional Share Class is passively managed, using index sampling and seeks to track the performance of the Bloomberg Global Aggregate ex-USD Float Adjusted RIC Capped Index (USD Hedged). This fund provides broad exposure to non-U.S. investment grade bonds, primarily bonds issued by developed countries, but also some from emerging markets countries. This fund experienced returns of 3.71%, 8.85% and (12.89%) for the years ended December 31, 2024, 2023 and 2022, respectively. The share price of this fund increased from \$28.42 on December 31, 2022, to \$29.60 on December 31, 2023, but decreased to \$29.45 on December 31, 2024.

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## MANAGEMENT'S DISCUSSION AND ANALYSIS (Unaudited) December 31, 2024 and 2023

### Investment Commentary (*Continued*)

The Vanguard Short-Term Inflation-Protected Securities Index Fund Institutional Share Class employs an indexing investment approach designed to track the performance of the Bloomberg U.S. Treasury Inflation-Protected Securities (TIPS) 0-5 Year Index. This index is a market-capitalization-weighted index that includes all inflation-protected public obligations issued by the U.S. Treasury with remaining maturities of less than five years. This fund experienced returns of 4.75%, 4.61% and (2.80%) for the years ended December 31, 2024, 2023 and 2022, respectively. The share price of this fund increased from \$23.44 at December 31, 2022, to \$23.83 at December 31, 2023, to \$24.30 at December 31, 2024.

The Vanguard Short-Term Reserves Account seeks to provide current and stable income while maintaining a \$1 net asset value. This fund seeks to achieve its objective by diversifying among high-credit-quality investments and investment contracts that are structured to smooth market gains and losses over time. This fund experienced returns of 2.88%, 2.55% and 1.59% for the years ended December 31, 2024, 2023, and 2022, respectively.

### Recent Developments

#### Investment Option Changes

Effective April 11, 2025, the three Aged-Based Options will close, and assets will be automatically transferred into either one of eleven new Target Enrollment Portfolios or two existing Individual Portfolios, based on the designated beneficiary's date of birth and the account owner's risk tolerance.

### Requests for Information

This financial report is designed to provide a general overview of the Plan's financial status and changes in financial status. Additional information can be found at [www.collegesave4u.com](http://www.collegesave4u.com). If you have any questions about the information provided, please call the Plan's customer service representatives at 1-866-728-3529.



## **Basic Financial Statements**

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# College **SAVE**<sup>TM</sup>

Bank of North Dakota's 529 Plan  
(A Fiduciary Fund of the State of North Dakota)

## STATEMENTS OF FIDUCIARY NET POSITION December 31, 2024 and 2023

	2024	2023
<b>ASSETS</b>		
Investments	\$ 643,668,088	\$ 602,505,906
Cash and cash equivalents	1,376,475	795,752
Receivables from investments sold	709,627	309,403
<b>Total Assets</b>	<u>645,754,190</u>	<u>603,611,061</u>
<b>LIABILITIES</b>		
Payables for investments purchased	527,233	203,565
Withdrawals payable	888,625	798,667
Accrued administrative fees	331,881	307,149
<b>Total Liabilities</b>	<u>1,747,739</u>	<u>1,309,381</u>
<b>NET POSITION HELD IN TRUST FOR ACCOUNT OWNERS AND BENEFICIARIES</b>	<u>\$ 644,006,451</u>	<u>\$ 602,301,680</u>

## STATEMENTS OF CHANGES IN FIDUCIARY NET POSITION Years Ended December 31, 2024 and 2023

	2024	2023
<b>ADDITIONS</b>		
Contributions	\$ 48,529,661	\$ 45,631,896
Investment income:		
Dividends, capital gain distributions and interest	17,762,172	16,048,137
Net increase in the fair value of investments	41,568,465	60,168,864
Net investment income	59,330,637	76,217,001
<b>Total Additions</b>	<u>107,860,298</u>	<u>121,848,897</u>
<b>DEDUCTIONS</b>		
Withdrawals	62,329,496	57,357,966
Administrative fees	3,826,031	3,509,489
<b>Total Deductions</b>	<u>66,155,527</u>	<u>60,867,455</u>
<b>NET INCREASE</b>	41,704,771	60,981,442
<b>NET POSITION HELD IN TRUST FOR ACCOUNT OWNERS AND BENEFICIARIES, BEGINNING OF YEAR</b>	<u>602,301,680</u>	<u>541,320,238</u>
<b>NET POSITION HELD IN TRUST FOR ACCOUNT OWNERS AND BENEFICIARIES, END OF YEAR</b>	<u>\$ 644,006,451</u>	<u>\$ 602,301,680</u>

See accompanying notes to financial statements.

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# College SAVE™

Bank of North Dakota's 529 Plan  
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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### **NOTE 1: ORGANIZATION AND NATURE OF OPERATIONS**

The following provides a brief description of College SAVE (the Plan). For more information and disclosures about the Plan, refer to the *College SAVE Plan Disclosure Statement and Participation Agreement* available on the Plan's website ([www.collegesave4u.com](http://www.collegesave4u.com)) or call 1-866-728-3529.

#### **(a) General**

The Plan was created in September of 2000, pursuant to North Dakota Century Code Title 6, Chapter 9, Section 38, to enable residents of North Dakota (and other states) to save on a tax-favored basis for qualified higher education expenses. The Plan is designed to comply with the requirements for treatment as a "qualified tuition program" under Section 529 of the Internal Revenue Code of 1986, as amended, and any regulations and other guidance issued thereunder (Section 529).

The College SAVE Trust (the Trust) was created to hold the assets of the Plan. The Bank of North Dakota (the Bank), an enterprise fund of the state of North Dakota, is the designated Trustee. Assets of the Plan can only be used for the benefit of account owners and their beneficiaries and cannot be used by the state of North Dakota or the Bank to support other programs or operations. The Plan is included in the financial reporting entity of the state of North Dakota as a fiduciary fund.

These basic financial statements present only the balances that are directly attributable to the Plan. These basic financial statements are not intended to, and do not, represent a complete presentation of the financial position and changes in financial position of the Trust or any other fiduciary funds of the state of North Dakota.

#### **(b) Administration**

As Trustee, the Bank is the authority responsible for oversight and overall administration of the Plan. Rules governing the operation of the Plan, as adopted by the Bank, are set forth in the North Dakota Administrative Code Title 12.5, Article 2, Chapter 1 (the Administrative Code). The Administrative Code allows the Bank to enter into contracts with service providers, agents or third-party contractors to administer the Plan, provide investment advice for the Plan, provide accounting and recordkeeping services for the Plan, enroll participants, process account owner transactions and market the Plan.

Pursuant to the College SAVE Plan Management Agreement, as amended (the Management Agreement), Ascensus Broker Dealer Services, LLC (ABD) serves as the Plan Manager and Ascensus College Savings Recordkeeping Services, LLC (ACSR) serves as the recordkeeping and servicing agent. Collectively, ABD and ACSR are referred to as "Ascensus Government Savings (AGS)."

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### **NOTE 1: ORGANIZATION AND NATURE OF OPERATIONS (Continued)**

#### **(b) Administration (Continued)**

Pursuant to the terms of the North Dakota 529 Program Operational Agreement, as amended (the Operational Agreement), The Vanguard Group, Inc. (Vanguard) provides investment advisory and related administrative services.

The Bank of New York Mellon Corporation (BNY Mellon) is the custody agent for the Plan, responsible for maintaining a custody account to provide for the safekeeping and recordkeeping of certain assets invested in the Plan.

### **NOTE 2: SIGNIFICANT ACCOUNTING POLICIES**

#### **(a) Basis of Accounting**

In accordance with accounting principles generally accepted in the United States of America (U.S. GAAP) applicable to fiduciary fund types prescribed by the Governmental Accounting Standards Board (GASB), the Plan's basic financial statements are prepared using the flow of economic resources measurement focus and accrual basis of accounting.

#### **(b) Income Taxes**

The Plan has been designed to comply with the requirements for treatment as a "qualified tuition program" under Section 529. As such, the Plan is exempt from federal and state income tax.

#### **(c) Estimates**

The preparation of basic financial statements, in conformity with U.S. GAAP, requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results may differ from those estimates.

#### **(d) Investments**

The Plan's investments consist of Vanguard mutual funds and investment contracts (the Underlying Funds).

The mutual funds are reported at fair value, determined by Vanguard based on the net asset value per share of each mutual fund as of the close of the New York Stock Exchange (NYSE) on the reporting date. Net realized and unrealized gains (losses) are included in "net increase (decrease) in the fair value of investments" on the statements of changes in fiduciary net position. Purchase and sales of shares of mutual funds, as well as investments into or withdrawals from the investment contracts, are recorded on a trade-date basis. Dividends and capital gain distributions are recorded on the ex-dividend date and are automatically reinvested in additional shares of the respective mutual fund.

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### **NOTE 2: SIGNIFICANT ACCOUNTING POLICIES (Continued)**

#### **(d) Investments (Continued)**

The investment contracts, which include contracts issued by financial institutions and insurance companies, are fully benefit-responsive and are reported at contract value, which is equal to contributions, plus interest credited at a guaranteed rate, less withdrawals and any applicable fees and expenses. Interest is accrued as it is earned.

Accounting standards categorize fair value measurements according to a hierarchy that is based on valuation inputs that are used to measure fair value. Level 1 inputs are quoted prices for identical assets in active markets that can be accessed at the measurement date. Level 2 inputs are inputs other than quoted market prices that are observable for an asset, either directly or indirectly. Level 3 inputs are unobservable. The fair values of the Plan's mutual funds are determined using Level 1 inputs. The fair value standards are not applicable to the investment contracts, since they are reported at contract value, rather than fair value.

#### **(e) Cash and Cash Equivalents**

Cash and cash equivalents generally include contributions received that have not yet been invested in Underlying Funds and/or redemption proceeds from Underlying Funds for withdrawals that have not yet been distributed in accordance with account owners' instructions.

Contribution and withdrawal transactions are processed through a non-interest-bearing account maintained at BNY Mellon in the Plan's name. The bank balances of this account at December 31, 2024 and 2023, are \$92,770 and \$29,590, respectively. Balances in this account are insured by the Federal Deposit Insurance Corporation (FDIC), along with any other accounts maintained at BNY Mellon under the same taxpayer identification number, in the aggregate, up to the maximum amount allowable under federal law. Amounts in excess of FDIC insurance limits are not collateralized or covered by supplementary insurance.

Excess cash balances are swept daily from the BNY Mellon account described in the preceding paragraph into a separate account and invested in a government money market mutual fund structured to maintain a net asset value per share equal to \$1. The balances of this account at December 31, 2024 and 2023, are \$1,946,632 and \$1,688,457, respectively.

Cash and cash equivalents also include the Plan's equity position in a non-interest-bearing pooled cash account maintained by Vanguard for the benefit of the Plan and other Vanguard clients to settle investment buy and sell transactions. This account is held in the name of Vanguard and is insured by the FDIC up to the maximum amount allowable under federal law. Balances in excess of FDIC insurance limits are not collateralized or covered by supplementary insurance. The Plan's equity position in this account, which is (\$182,394) and (\$105,838) at December 31, 2024 and 2023, respectively, is segregated from balances attributable to other Vanguard clients on Vanguard's books and records.

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### **NOTE 2: SIGNIFICANT ACCOUNTING POLICIES (Continued)**

#### **(f) Contributions**

Individuals or entities meeting eligibility requirements who execute a participation agreement with the Plan may establish an account to which cash contributions may be made, subject to certain minimum contribution requirements and limitations on the aggregate amount of contributions. Contributions received by AGS prior to the close of the NYSE are recorded as increases in fiduciary net position on the date they are received, provided that all related documentation is found to be in good order and approved by AGS.

Account owners may elect to invest their contributions in one or more investment options offered by the Plan, consisting of six (6) Individual Portfolios and three (3) Age-Based Options. The Individual Portfolios are structured for various time horizons and levels of risk tolerance and are designed to allow account owners flexibility in managing their asset allocations. The Age-Based Options allow account owners to choose a predetermined investment strategy based on their risk tolerance and the age of the beneficiary. Over time, as the beneficiary approaches college age, the asset allocation becomes more conservative.

In addition to the various investment options, the Plan offers two unit classes, the Direct Class (available to account owners who do not utilize a financial advisor to invest in the Plan) and the Advisor Class (available to account owners who utilize a financial advisor to invest in the Plan). As more fully disclosed in Note 4, each unit class is subject to a different fee structure.

In exchange for contributions to the Plan, account owners receive full and/or fractional interests, or units, issued by the Trust. These units are municipal fund securities. Although money contributed to the Plan is invested in investment options that hold mutual funds or investment contracts, the units themselves are not direct investments in the mutual funds or the investment contracts. These units are not insured by the FDIC, the Bank or the state of North Dakota, nor have they been registered with the Securities and Exchange Commission or any state commission.

In addition, although account owners can select the investment options in which their contributions are invested, they cannot direct the selection or allocation of the Underlying Funds composing each investment option.

The Trustee allows North Dakota resident account owners who meet certain eligibility requirements to be considered for a BND Match award. Once all requirements are met, and the account owner has contributed to their account within twelve (12) months from the enrollment date, a dollar for dollar match up to \$300 will be awarded. BND Match awards total approximately \$137.7 thousand and \$155.4 thousand for the years ended December 31, 2024 and 2023, respectively, and are included in contributions on the statements of changes in fiduciary net position.



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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### **NOTE 2: SIGNIFICANT ACCOUNTING POLICIES (Continued)**

#### **(f) Contributions (Continued)**

New Baby Match allows North Dakota newborns to be considered for a one-time award. To be eligible to receive this award, interested persons must complete and return an enrollment form during the time the beneficiary, who must be a North Dakota resident, is twelve (12) months old or younger. In addition, the account owner has up to twelve (12) months from enrollment date to contribute to the account in order to be eligible to receive a dollar for dollar match in an amount of up to \$200. New Baby Match awards total approximately \$242.4 thousand and \$222.9 thousand for the years ended December 31, 2024 and 2023, respectively, and are included in contributions on the statements of changes in fiduciary net position.

The Kindergarten Kickoff Match allows North Dakota resident beneficiaries who meet certain requirements to be considered for a one-time award. To be eligible to receive this award, interested persons must complete and return an enrollment form during the time the beneficiary, who must be a North Dakota resident, is five (5) or six (6) years old. In addition, the account owner has up to twelve (12) months after being awarded the grant or prior to the beneficiary's seventh birthday to contribute to the account in order to be eligible to receive a dollar for dollar match in an amount of up to \$100. Kindergarten Kickoff Match awards total approximately \$68.3 thousand and \$73.7 thousand for the years ended December 31, 2024 and 2023, respectively, and are included in contributions on the statements of changes in fiduciary net position.

The Bank, on behalf of the account owner and designated beneficiary, will open a single matching account when their application for a specific match is verified. This matching account holds all match designations and assets regardless of the combination of matches applicable. The Bank retains ownership of the assets in this matching account until the account owner submits a request in good order for a qualified withdrawal to an eligible educational institution.

#### **(g) Withdrawals**

Account owners may request withdrawals for qualified or non-qualified expenses. It is the responsibility of the account owner to determine whether or not the withdrawal is for qualified educational expenses and to calculate the applicable amount of federal or state tax or penalties for non-qualified withdrawals, if any. Withdrawals are recorded as deductions from fiduciary net position on the date the withdrawal request is found to be in good order and approved by AGS.

Withdrawals include annual account maintenance fees, which are \$20 for each account and are assessed annually during the anniversary month of the account opening. This fee is not charged to BND Match, New Baby Match or Kindergarten Kickoff Match accounts, nor is it charged to those accounts for which the account owner or the beneficiary is a North Dakota resident. In addition, accounts established prior to February 28, 2002, where either the account owner or the beneficiary was a resident of South Dakota

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### **NOTE 2: SIGNIFICANT ACCOUNTING POLICIES (Continued)**

#### **(g) Withdrawals (Continued)**

at the time of account opening, are not subject to this fee. Withdrawals also may include service fees for other transactions, such as returned checks, overnight delivery charges, outgoing wire transfers and requests for historical statements. These annual account maintenance fees and service fees, which total approximately \$170.5 thousand and \$178.0 thousand for the years ended December 31, 2024 and 2023, respectively, are paid to AGS.

#### **(h) Exchanges and Transfers**

For each of the Age-Based Options, account balances will automatically be exchanged from one investment option to another more conservative investment option as the beneficiary approaches college age. In addition, subject to certain limitations and restrictions, account owners may generally direct that their account balance be reinvested in one or more different investment options twice per calendar year. Transfers of funds between investment options are referred to as "exchanges." Under certain conditions, account assets may be transferred from one beneficiary to another or from one account owner to another. These transactions are referred to as "transfers." The amounts of contributions and withdrawals reported on the statements of changes in fiduciary net position do not include exchanges or transfers, as these transactions have no impact on the net position of the Plan.

#### **(i) Unit Valuation**

Each account owner's full and/or fractional interest in an investment option is evidenced by a unit. The net asset value of a unit is calculated daily based on the value of the Underlying Funds, adjusted for the effects of such transactions as accrued administrative fees and investment income that has not been reinvested. The value of any individual account is determined by multiplying the number of units in an investment option attributable to that account owner by the net asset value per unit of that investment option.

#### **(j) Indemnification**

Neither the Bank, Vanguard, AGS nor any other person or entity, indemnifies any account owner or designated beneficiary against losses or other claims arising from the official or unofficial acts, negligent or otherwise, of members of the Bank, Vanguard or AGS. The Bank, Vanguard and AGS have entered into contracts related to the operation and administration of the Plan that contain a variety of representations and warranties that provide general indemnifications. The maximum exposure under these arrangements is unknown, as this would involve future claims that may be made against the Bank, Vanguard or AGS that have not yet occurred. However, the Bank, Vanguard and AGS have not experienced any prior claims or losses pursuant to these contracts, and the risk of loss is expected to be remote.

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### NOTE 3: INVESTMENTS

#### (a) Investments by Type

At December 31, 2024 and 2023, investments held in the various investment options are detailed in the schedules that follow. Percentages are rounded to the nearest tenth of a percent.

2024			
Underlying Fund	Designation	Balance as of December 31, 2024	Percent of Total Balance
<b>Aggressive Growth Portfolio</b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	\$ 95,369,053	59.9%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	63,887,228	40.1%
		<u>159,256,281</u>	<u>100.0%</u>
<b>Aggressive Portfolio <sup>(1)</sup></b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	24,676,651	52.2%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	16,629,920	35.1%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	4,193,312	8.9%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	1,798,836	3.8%
		<u>47,298,719</u>	<u>100.0%</u>
<b>Growth Portfolio</b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	39,802,393	44.8%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	26,651,119	29.9%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	15,765,961	17.7%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	6,782,083	7.6%
		<u>89,001,556</u>	<u>100.0%</u>

<sup>(1)</sup> Age-Based Option portfolio only. Not available for investment as an Individual Portfolio.

(Continued)

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### NOTE 3: INVESTMENTS (Continued)

#### (a) Investments by Type (Continued)

2024			
Underlying Fund	Designation	Balance as of December 31, 2024	Percent of Total Balance
<b>Blended Growth Portfolio <sup>(1)</sup></b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	\$ 14,613,730	37.2%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	9,786,151	25.0%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	10,365,753	26.4%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	4,464,866	11.4%
		<u>39,230,500</u>	<u>100.0%</u>
<b>Moderate Growth Portfolio</b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	20,790,952	29.7%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	13,987,596	20.0%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	24,690,152	35.2%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	10,598,737	15.1%
		<u>70,067,437</u>	<u>100.0%</u>
<b>Blended Moderate Growth Portfolio <sup>(1)</sup></b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	10,023,822	22.4%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	6,643,942	14.9%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	19,585,859	43.9%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	8,415,235	18.8%
		<u>44,668,858</u>	<u>100.0%</u>

<sup>(1)</sup> Age-Based Option portfolio only. Not available for investment as an Individual Portfolio.

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### NOTE 3: INVESTMENTS (Continued)

#### (a) Investments by Type (Continued)

2024			
Underlying Fund	Designation	Balance as of December 31, 2024	Percent of Total Balance
<b>Conservative Growth Portfolio</b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	\$ 8,160,567	14.7%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	5,513,760	10.0%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	29,133,212	52.7%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	12,494,140	22.6%
		<u>55,301,679</u>	<u>100.0%</u>
<b>Conservative Portfolio <sup>(1)</sup></b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	4,264,853	7.4%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	2,877,884	5.0%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	35,525,963	61.3%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	15,235,027	26.3%
		<u>57,903,727</u>	<u>100.0%</u>
<b>Income Portfolio</b>			
Vanguard Short-Term Reserves Account	Stable Value	12,923,880	25.0%
Vanguard Short-Term Inflation-Protected Securities Index Fund Institutional Shares	Inflation-Protected Bond	9,308,319	18.0%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	17,816,390	34.5%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	11,634,553	22.5%
		<u>51,683,142</u>	<u>100.0%</u>

<sup>(1)</sup> Age-Based Option portfolio only. Not available for investment as an Individual Portfolio.

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### NOTE 3: INVESTMENTS (Continued)

#### (a) Investments by Type (Continued)

2024			
Underlying Fund	Designation	Balance as of December 31, 2024	Percent of Total Balance
<b>Balanced Income Portfolio <sup>(1)</sup></b>			
Vanguard Short-Term Reserves Account	Stable Value	\$ 1,246,220	50.1%
Vanguard Short-Term Inflation-Protected Securities Index Fund Institutional Shares	Inflation-Protected Bond	298,625	12.0%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	569,053	22.9%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	371,998	15.0%
		<u>2,485,896</u>	<u>100.0%</u>
<b>Conservative Income Portfolio <sup>(1)</sup></b>			
Vanguard Short-Term Reserves Account	Stable Value	1,833,107	75.0%
Vanguard Short-Term Inflation-Protected Securities Index Fund Institutional Shares	Inflation-Protected Bond	146,743	6.0%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	280,719	11.5%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	183,407	7.5%
		<u>2,443,976</u>	<u>100.0%</u>
<b>Interest Accumulation Portfolio</b>			
Vanguard Short-Term Reserves Account	Stable Value	24,326,317	100.0%
<b>Total Investments</b>		<u>\$ 643,668,088</u>	

<sup>(1)</sup> Age-Based Option portfolio only. Not available for investment as an Individual Portfolio.

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### NOTE 3: INVESTMENTS (Continued)

#### (a) Investments by Type (Continued)

2023			
Underlying Fund	Designation	Balance as of December 31, 2023	Percent of Total Balance
<b>Aggressive Growth Portfolio</b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	\$ 83,681,552	59.8%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	56,359,738	40.2%
		<u>140,041,290</u>	<u>100.0%</u>
<b>Aggressive Portfolio <sup>(1)</sup></b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	23,135,292	52.4%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	15,541,845	35.2%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	3,863,081	8.7%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	1,651,613	3.7%
		<u>44,191,831</u>	<u>100.0%</u>
<b>Growth Portfolio</b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	36,374,115	45.0%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	24,447,264	30.2%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	14,105,685	17.4%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	6,027,399	7.4%
		<u>80,954,463</u>	<u>100.0%</u>

<sup>(1)</sup> Age-Based Option portfolio only. Not available for investment as an Individual Portfolio.

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### NOTE 3: INVESTMENTS (Continued)

#### (a) Investments by Type (Continued)

2023			
Underlying Fund	Designation	Balance as of December 31, 2023	Percent of Total Balance
<b>Blended Growth Portfolio <sup>(1)</sup></b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	\$ 13,585,963	37.3%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	9,153,648	25.3%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	9,494,102	26.2%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	4,056,438	11.2%
		<u>36,290,151</u>	<u>100.0%</u>
<b>Moderate Growth Portfolio</b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	20,041,972	30.0%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	13,461,146	20.2%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	23,245,631	34.9%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	9,932,364	14.9%
		<u>66,681,113</u>	<u>100.0%</u>
<b>Blended Moderate Growth Portfolio <sup>(1)</sup></b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	9,170,876	22.6%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	6,188,111	15.2%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	17,744,168	43.6%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	7,583,596	18.6%
		<u>40,686,751</u>	<u>100.0%</u>

<sup>(1)</sup> Age-Based Option portfolio only. Not available for investment as an Individual Portfolio Option.

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### NOTE 3: INVESTMENTS (Continued)

#### (a) Investments by Type (Continued)

2023			
Underlying Fund	Designation	Balance as of December 31, 2023	Percent of Total Balance
<b>Conservative Growth Portfolio</b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	\$ 8,366,957	15.0%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	5,631,832	10.1%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	29,344,036	52.5%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	12,543,318	22.4%
		<u>55,886,143</u>	<u>100.0%</u>
<b>Conservative Portfolio <sup>(1)</sup></b>			
Vanguard Total Stock Market Index Fund Institutional Plus Shares	Domestic Large Blend	4,097,478	7.5%
Vanguard Total International Stock Index Fund Institutional Plus Shares	International Large Blend	2,754,356	5.0%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	33,584,699	61.3%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	14,352,195	26.2%
		<u>54,788,728</u>	<u>100.0%</u>
<b>Income Portfolio</b>			
Vanguard Short-Term Reserves Account	Stable Value	13,500,656	25.0%
Vanguard Short-Term Inflation-Protected Securities Index Fund Institutional Shares	Inflation-Protected Bond	9,732,801	18.0%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	18,670,651	34.5%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	12,144,350	22.5%
		<u>54,048,458</u>	<u>100.0%</u>

<sup>(1)</sup> Age-Based Option portfolio only. Not available for investment as an Individual Portfolio.

(Continued)

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### NOTE 3: INVESTMENTS (Continued)

#### (a) Investments by Type (Continued)

2023			
Underlying Fund	Designation	Balance as of December 31, 2023	Percent of Total Balance
<b>Balanced Income Portfolio <sup>(1)</sup></b>			
Vanguard Short-Term Reserves Account	Stable Value	\$ 938,801	49.7%
Vanguard Short-Term Inflation-Protected Securities Index Fund Institutional Shares	Inflation-Protected Bond	225,796	12.0%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	438,030	23.2%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	284,223	15.1%
		<u>1,886,850</u>	<u>100.0%</u>
<b>Conservative Income Portfolio <sup>(1)</sup></b>			
Vanguard Short-Term Reserves Account	Stable Value	2,469,931	75.0%
Vanguard Short-Term Inflation-Protected Securities Index Fund Institutional Shares	Inflation-Protected Bond	197,677	6.0%
Vanguard Total Bond Market II Index Fund Institutional Shares	Intermediate-Term Bond	378,799	11.5%
Vanguard Total International Bond Index Fund Institutional Shares	Intermediate-Term Bond	246,304	7.5%
		<u>3,292,711</u>	<u>100.0%</u>
<b>Interest Accumulation Portfolio</b>			
Vanguard Short-Term Reserves Account	Stable Value	23,757,417	100.0%
<b>Total Investments</b>		<u>\$ 602,505,906</u>	

<sup>(1)</sup> Age-Based Option portfolio only. Not available for investment as an Individual Portfolio Option.

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### NOTE 3: INVESTMENTS (Continued)

#### (b) Vanguard Short-Term Reserves Account

The Plan maintains a stable value separate account that serves as an underlying asset for certain investment options. This account, which is managed by Vanguard, invests in traditional and synthetic (wrap) contracts issued by insurance companies, bank investment contracts issued by financial institutions and a money market mutual fund. These contracts are held in the name of the Bank, as Trustee of the Trust in which the Plan's assets are held. The underlying holdings of this account at December 31, 2024 and 2023, are as follows:

	2024	2023
<b>Investment contracts, at contract value</b>		
Traditional contracts:		
Metropolitan Life	\$ 690,175	\$ 779,020
New York Life Insurance Company	222,949	217,502
Total traditional contracts	<u>913,124</u>	<u>996,522</u>
Wrap contracts:		
American General Life Insurance Company	3,096,979	3,010,913
Citibank	3,008,683	2,927,434
JPMorgan Chase Bank	2,119,610	2,061,538
Massachusetts Mutual Life Insurance Company	4,126,762	4,010,875
Metropolitan Life	3,646,778	3,551,074
Nationwide Life	4,025,675	3,916,645
New York Life Insurance Company	4,285,182	4,173,675
Pacific Life	3,563,547	3,467,577
Prudential Insurance Company	3,907,103	3,798,381
State Street Bank	4,098,864	3,984,422
Transamerica	3,052,418	2,968,340
Total wrap contracts	<u>38,931,601</u>	<u>37,870,874</u>
<b>Vanguard Federal Money Market Fund</b>	<u>484,799</u>	<u>1,799,409</u>
<b>Total Vanguard Short-Term Reserves Account</b>	<u>\$ 40,329,524</u>	<u>\$ 40,666,805</u>

The crediting rates on these contracts range from 1.95% to 4.90% at December 31, 2024, and from 0.90% to 3.33% at December 31, 2023. These rates may reset periodically.

The underlying assets of the wrap contracts are set forth in the related agreements and are the Vanguard Institutional Short-Term Bond Fund and the Vanguard Institutional Intermediate-Term Bond Fund. The fair value of these underlying assets at December 31, 2024 and 2023, is \$36,933,734 and \$35,687,186, respectively.

# College SAVE™

Bank of North Dakota's 529 Plan  
(A Fiduciary Fund of the State of North Dakota)

## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### NOTE 3: INVESTMENTS (Continued)

#### (b) Vanguard Short-Term Reserves Account (Continued)

The bank investment contracts are not insured by the FDIC or otherwise covered by collateral or supplementary insurance.

#### (c) Net Increase in the Fair Value of Investments

The following table calculates the net increase in the fair value of investments during the years ended December 31, 2024 and 2023:

	2024	2023
Value of investments, end of year	\$ 643,668,088	\$ 602,505,906
Less cost of investments purchased and investment income reinvested during the year	(109,115,253)	(100,905,789)
Plus proceeds from investments sold during the year	109,521,536	100,308,135
Less value of investments, beginning of year	(602,505,906)	(541,739,388)
Net increase in the fair value of investments	<u>\$ 41,568,465</u>	<u>\$ 60,168,864</u>

#### (d) Investment Risk

The mutual funds in which the Plan invests include various types of investment securities in their asset holdings, such as corporate debt and equity securities, obligations of the U.S. government and government agencies and international debt and equity securities. These securities are exposed to interest rate, market and credit risk, and it is at least reasonably possible that changes in their fair values could occur in the near term, materially affecting account owner balances and the amounts reported in the Plan's basic financial statements.

U.S. GAAP requires that certain disclosures be made related to the Plan's investment policy and exposure to credit risk, interest rate risk and foreign currency risk, which are included in the paragraphs that follow.

#### Investment Policy

The Underlying Funds in which the Plan's assets are invested and the allocation of the Underlying Funds within each investment option are specified in the Management Agreement and the Operational Agreement and may not be changed without approval of the Bank. There is no separate investment policy that specifically addresses credit risk, interest rate risk, concentrations of credit risk or foreign currency risk.

# College SAVE™

Bank of North Dakota's 529 Plan  
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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### NOTE 3: INVESTMENTS (Continued)

#### (d) Investment Risk (Continued)

##### Credit Risk

Certain mutual funds invest in bonds issued by corporations, foreign governments, the U.S. government, its agencies and instrumentalities. Through its investment in bond funds, the Plan is indirectly exposed to credit risk, which is the risk that a bond issuer will fail to pay interest and principal, when due, as a result of adverse market or economic conditions. The bond funds in which the Plan invests are not rated as to credit quality by a nationally recognized statistical rating organization.

The Plan's mutual funds are not subject to classification by custodial credit risk, which is the risk the Plan will not recover the value of investments that are in the possession of an outside party.

##### Interest Rate Risk

The Plan is indirectly exposed to interest rate risk through its investment in bond funds. Interest rate risk is the risk that changes in interest rates will adversely impact the fair value of an investment. Average maturity, which is a measure of interest rate risk, is the average length of time until fixed-income securities held by a fund reach maturity and will be repaid, taking into consideration the possibility that the issuer may call a bond before its maturity date. In general, the longer the average maturity, the more a fund's share price will fluctuate in response to a change in interest rates. Average duration is also a measure of how much the value of the bonds held by a fund will fluctuate in response to changes in interest rates. As of December 31, 2024, the average maturity and average duration of the bond funds in which the Plan invests are as follows:

	<u>Average Maturity</u>	<u>Average Duration</u>
Vanguard Short-Term Inflation-Protected Securities Index Fund Institutional Shares	2.4 years	2.3 years
Vanguard Total Bond Market II Index Fund Institutional Shares	8.3 years	5.9 years
Vanguard Total International Bond Index Fund Institutional Shares	8.7 years	7.1 years
Vanguard Federal Money Market Fund	25 days	N/A

##### Foreign Currency Risk

The Vanguard Total International Stock Index Fund Institutional Plus Shares invests in a diversified index of non-U.S. stocks representing the major developed and emerging equity markets, and the Vanguard Total International Bond Index Fund Institutional Shares invests in diversified investment grade, fixed-income investments issued in currencies other than the U.S. dollar. There are certain inherent risks involved when investing in international securities that are not present with investments in domestic securities, such as foreign currency exchange rate fluctuations, adverse political and economic developments and the possible prevention or delay of currency exchange due to foreign governmental laws or restrictions.

# College SAVE™

Bank of North Dakota's 529 Plan  
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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### NOTE 4: ADMINISTRATIVE FEES AND OTHER EXPENSES

#### (a) Administrative Fees

As provided in the Management Agreement and the Operational Agreement, AGS, Vanguard and the Bank are entitled to service fees, including plan management fees and state administrative fees, which are calculated based on the fiduciary net position of each investment option, accrued daily and paid monthly.

In addition, Advisor Class units of each investment option, excluding the Interest Accumulation Portfolio, are subject to an ongoing distribution and service fee, which is calculated based on net position of Advisor Class units in each investment option and accrued daily. This fee is paid monthly to AGS, and on a quarterly basis is distributed to financial advisors for certain distribution and account-related services. Direct Class units are not subject to the distribution and service fee.

Administrative fees related to the years ended December 31, 2024 and 2023, are as follows:

	2024	2023
AGS	\$ 2,703,598 <sup>(1)</sup>	\$ 2,483,287 <sup>(1)</sup>
Vanguard	490,241	456,837
Bank	632,192	569,365
Total administrative fees	<u>\$ 3,826,031</u>	<u>\$ 3,509,489</u>

<sup>(1)</sup> Includes distribution and service fees ultimately paid to financial advisors.

#### (b) Underlying Fund Expenses

Vanguard also receives compensation for management of the mutual funds in which the Plan invests. This compensation is not included in administrative fees presented on the Plan's statements of changes in fiduciary net position since it reduces the amount of investment income available for distribution to the Plan and is not a direct expense paid from Plan assets.

#### (c) Other Administrative Expenses

The Bank incurs certain costs in performing administrative, marketing and oversight services for the Plan and funding BND Match, New Baby Match and Kindergarten Kickoff Match for qualifying account owners. These costs, which total \$563,485 and \$748,543 for the years ended December 31, 2024 and 2023, respectively, are not paid directly from Plan assets and are not reported as expenses in the accompanying basic financial statements.

# College SAVE™

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## NOTES TO FINANCIAL STATEMENTS December 31, 2024 and 2023

### **NOTE 4: ADMINISTRATIVE FEES AND OTHER EXPENSES (Continued)**

#### **(c) Other Administrative Expenses (Continued)**

Pursuant to the terms of the Management Agreement, AGS is required, on an annual basis, to provide a cash marketing commitment to the Bank for marketing of the Plan and a marketing support commitment for the design, production and distribution of collateral marketing materials, including the Plan's disclosure statement, and for phone and email sales and service support. The commitment amounts vary each year. The annual cash marketing commitment and marketing support commitment, which total \$337,384 and \$327,557 for the years ended December 31, 2024 and 2023, respectively, are not paid directly from Plan assets and are not reported as expenses in the accompanying basic financial statements.

## **Supplementary Information**



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# College SAVE™

Bank of North Dakota's 529 Plan

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## SCHEDULE OF FIDUCIARY NET POSITION BY INVESTMENT OPTION December 31, 2024

	Aggressive Growth Portfolio	Aggressive Portfolio*	Growth Portfolio	Blended Growth Portfolio*	Moderate Growth Portfolio	Blended Moderate Growth Portfolio*	Conservative Growth Portfolio
<b>ASSETS</b>							
Investments	\$ 159,256,281	\$ 47,298,719	\$ 89,001,556	\$ 39,230,500	\$ 70,067,437	\$ 44,668,858	\$ 55,301,679
Cash and cash equivalents (cash overdraft)	533,619	138,288	230,873	209,685	134,844	57,828	116,619
Receivables from investments sold	-	-	-	-	-	-	60,733
<b>Total Assets</b>	<u>159,789,900</u>	<u>47,437,007</u>	<u>89,232,429</u>	<u>39,440,185</u>	<u>70,202,281</u>	<u>44,726,686</u>	<u>55,479,031</u>
<b>LIABILITIES</b>							
Payables for investments purchased	279,142	46,144	49,801	73,198	68,893	9,610	-
Withdrawals payable	113,291	3,889	70,879	10,357	17,192	7,334	110,126
Accrued administrative fees	83,486	22,801	47,127	19,102	35,940	22,597	28,352
<b>Total Liabilities</b>	<u>475,919</u>	<u>72,834</u>	<u>167,807</u>	<u>102,657</u>	<u>122,025</u>	<u>39,541</u>	<u>138,478</u>
<b>NET POSITION HELD IN TRUST FOR ACCOUNT OWNERS AND BENEFICIARIES</b>	<u>\$ 159,313,981</u>	<u>\$ 47,364,173</u>	<u>\$ 89,064,622</u>	<u>\$ 39,337,528</u>	<u>\$ 70,080,256</u>	<u>\$ 44,687,145</u>	<u>\$ 55,340,553</u>
<b>UNIT INFORMATION<sup>(1) (2)</sup></b>							
<b>Advisor Class</b>							
Units outstanding	2,183,636	1,025,085	1,419,505	987,769	1,278,392	1,498,026	1,256,921
Net asset value per unit	\$ 35.76	\$ 16.32	\$ 31.34	\$ 14.50	\$ 24.69	\$ 12.72	\$ 19.09
<b>Direct Class</b>							
Units outstanding	3,995,434	1,835,517	2,540,019	1,689,053	2,560,955	1,971,712	2,464,303
Net asset value per unit	\$ 20.33	\$ 16.69	\$ 17.55	\$ 14.81	\$ 15.04	\$ 13.00	\$ 12.72

<sup>(1)</sup> Rounded to the nearest whole unit.

<sup>(2)</sup> Rounded to the nearest hundredth.

\* Age-based Option portfolio only. Not available for investment as an Individual Portfolio Option.

See Independent Auditor's Report.

# College SAVE™

Bank of North Dakota's 529 Plan

(A Fiduciary Fund of the State of North Dakota)

## SCHEDULE OF FIDUCIARY NET POSITION BY INVESTMENT OPTION December 31, 2024

	Conservative Portfolio*	Income Portfolio	Balanced Income Portfolio*	Conservative Income Portfolio*	Interest Accumulation Portfolio	Plan Total
<b>ASSETS</b>						
Investments	\$ 57,903,727	\$ 51,683,142	\$ 2,485,896	\$ 2,443,976	\$ 24,326,317	\$ 643,668,088
Cash and cash equivalents (cash overdraft)	49,041	24,539	1,937	6,820	(127,618)	1,376,475
Receivables from investments sold	155,848	295,798	-	7,923	189,325	709,627
<b>Total Assets</b>	<b>58,108,616</b>	<b>52,003,479</b>	<b>2,487,833</b>	<b>2,458,719</b>	<b>24,388,024</b>	<b>645,754,190</b>
<b>LIABILITIES</b>						
Payables for investments purchased	-	-	445	-	-	527,233
Withdrawals payable	239,684	279,330	-	-	36,543	888,625
Accrued administrative fees	31,993	28,749	1,008	1,140	9,586	331,881
<b>Total Liabilities</b>	<b>271,677</b>	<b>308,079</b>	<b>1,453</b>	<b>1,140</b>	<b>46,129</b>	<b>1,747,739</b>
<b>NET POSITION HELD IN TRUST FOR ACCOUNT OWNERS AND BENEFICIARIES</b>	<b>\$ 57,836,939</b>	<b>\$ 51,695,400</b>	<b>\$ 2,486,380</b>	<b>\$ 2,457,579</b>	<b>\$ 24,341,895</b>	<b>\$ 644,006,451</b>
<b>UNIT INFORMATION<sup>(1) (2)</sup></b>						
<b>Advisor Class</b>						
Units outstanding	2,942,759	2,037,974	21,841	57,475	952,314	
Net asset value per unit	\$ 11.07	\$ 14.42	\$ 10.82	\$ 10.88	\$ 11.35	
<b>Direct Class</b>						
Units outstanding	2,225,603	2,006,099	203,626	164,771	1,193,398	
Net asset value per unit	\$ 11.35	\$ 11.12	\$ 11.05	\$ 11.12	\$ 11.34	

<sup>(1)</sup> Rounded to the nearest whole unit.

<sup>(2)</sup> Rounded to the nearest hundredth.

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See Independent Auditor's Report.

# College SAVE™

Bank of North Dakota's 529 Plan  
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## SCHEDULE OF CHANGES IN FIDUCIARY NET POSITION BY INVESTMENT OPTION Year Ended December 31, 2024

	Aggressive Growth Portfolio	Aggressive Portfolio*	Growth Portfolio	Blended Growth Portfolio*	Moderate Growth Portfolio	Blended Moderate Growth Portfolio*	Conservative Growth Portfolio
<b>ADDITIONS</b>							
Contributions	\$ 15,446,885	\$ 6,033,366	\$ 5,714,050	\$ 3,550,805	\$ 4,764,957	\$ 2,607,908	\$ 3,061,934
Investment income:							
Dividends, capital gain distributions and interest	3,302,922	1,096,479	2,221,695	1,058,549	2,068,640	1,394,330	1,893,842
Net increase (decrease) in the fair value of investments	19,201,612	5,112,610	7,959,736	2,830,416	3,936,512	1,657,100	1,110,858
Net investment income	22,504,534	6,209,089	10,181,431	3,888,965	6,005,152	3,051,430	3,004,700
Exchanges and transfers in	8,229,631	9,269,784	18,949,799	17,120,281	23,263,972	23,503,782	26,420,196
<b>Total Additions</b>	<b>46,181,050</b>	<b>21,512,239</b>	<b>34,845,280</b>	<b>24,560,051</b>	<b>34,034,081</b>	<b>29,163,120</b>	<b>32,486,830</b>
<b>DEDUCTIONS</b>							
Withdrawals	8,962,978	1,178,007	5,854,963	736,987	3,916,115	1,364,254	6,931,667
Administrative fees	944,087	264,640	537,424	217,324	419,384	256,315	339,194
Exchanges and transfers out	16,980,855	16,963,655	20,341,619	20,567,935	26,291,637	23,561,466	25,612,215
<b>Total Deductions</b>	<b>26,887,920</b>	<b>18,406,302</b>	<b>26,734,006</b>	<b>21,522,246</b>	<b>30,627,136</b>	<b>25,182,035</b>	<b>32,883,076</b>
<b>NET INCREASE (DECREASE)</b>	<b>19,293,130</b>	<b>3,105,937</b>	<b>8,111,274</b>	<b>3,037,805</b>	<b>3,406,945</b>	<b>3,981,085</b>	<b>(396,246)</b>
<b>NET POSITION HELD IN TRUST FOR ACCOUNT AND BENEFICIARIES, BEGINNING OF YEAR</b>	<b>140,020,851</b>	<b>44,258,236</b>	<b>80,953,348</b>	<b>36,299,723</b>	<b>66,673,311</b>	<b>40,706,060</b>	<b>55,736,799</b>
<b>NET POSITION HELD IN TRUST FOR ACCOUNT AND BENEFICIARIES, END OF YEAR</b>	<b>\$ 159,313,981</b>	<b>\$ 47,364,173</b>	<b>\$ 89,064,622</b>	<b>\$ 39,337,528</b>	<b>\$ 70,080,256</b>	<b>\$ 44,687,145</b>	<b>\$ 55,340,553</b>

\* Age-based Option portfolio only. Not available for investment as an Individual Portfolio Option.

See Independent Auditor's Report.

# College SAVE™

Bank of North Dakota's 529 Plan  
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## SCHEDULE OF CHANGES IN FIDUCIARY NET POSITION BY INVESTMENT OPTION Year Ended December 31, 2024

	Conservative Portfolio*	Income Portfolio	Balanced Income Portfolio*	Conservative Income Portfolio*	Interest Accumulation Portfolio	Plan Total
<b>ADDITIONS</b>						
Contributions	\$ 2,639,596	\$ 2,844,525	\$ 255,736	\$ 229,090	\$ 1,380,809	\$ 48,529,661
Investment income:						
Dividends, capital gain distributions and interest	2,071,261	1,809,676	70,885	86,957	686,936	17,762,172
Net increase (decrease) in the fair value of investments	49,623	(276,560)	(9,424)	(4,018)	-	41,568,465
Net investment income	2,120,884	1,533,116	61,461	82,939	686,936	59,330,637
Exchanges and transfers in	25,523,964	11,789,054	1,462,872	1,374,546	7,866,019	174,773,900
<b>Total Additions</b>	<b>30,284,444</b>	<b>16,166,695</b>	<b>1,780,069</b>	<b>1,686,575</b>	<b>9,933,764</b>	<b>282,634,198</b>
<b>DEDUCTIONS</b>						
Withdrawals	13,626,185	13,310,624	36,204	457,920	5,953,592	62,329,496
Administrative fees	363,490	346,697	10,622	15,970	110,884	3,826,031
Exchanges and transfers out	13,123,479	4,870,550	1,134,870	2,046,524	3,279,095	174,773,900
<b>Total Deductions</b>	<b>27,113,154</b>	<b>18,527,871</b>	<b>1,181,696</b>	<b>2,520,414</b>	<b>9,343,571</b>	<b>240,929,427</b>
<b>NET INCREASE (DECREASE)</b>	<b>3,171,290</b>	<b>(2,361,176)</b>	<b>598,373</b>	<b>(833,839)</b>	<b>590,193</b>	<b>41,704,771</b>
<b>NET POSITION HELD IN TRUST FOR ACCOUNT AND BENEFICIARIES, BEGINNING OF YEAR</b>	<b>54,665,649</b>	<b>54,056,576</b>	<b>1,888,007</b>	<b>3,291,418</b>	<b>23,751,702</b>	<b>602,301,680</b>
<b>NET POSITION HELD IN TRUST FOR ACCOUNT AND BENEFICIARIES, END OF YEAR</b>	<b>\$ 57,836,939</b>	<b>\$ 51,695,400</b>	<b>\$ 2,486,380</b>	<b>\$ 2,457,579</b>	<b>\$ 24,341,895</b>	<b>\$ 644,006,451</b>

\* Age-based Option portfolio only. Not available for investment as an Individual Portfolio Option.

See Independent Auditor's Report.



**INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING  
AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS  
PERFORMED IN ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS***

Bank of North Dakota and  
Ascensus Broker Dealer Services, LLC  
College SAVE

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of **College SAVE** (the Plan), as of and for the year ended December 31, 2024, and the related notes to the financial statements, which collectively comprise the Plan's basic financial statements, and have issued our report thereon dated March 31, 2025.

**Report on Internal Control Over Financial Reporting**

In planning and performing our audit of the basic financial statements, we considered the Plan's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the basic financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Plan's internal control. Accordingly, we do not express an opinion on the effectiveness of the Plan's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's basic financial statements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Bank of North Dakota and  
Ascensus Broker Dealer Services, LLC  
College SAVE

### **Report on Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the Plan's basic financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and agreements, noncompliance with which could have a direct and material effect on the basic financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

### **Purpose of this Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Plan's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Plan's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

A handwritten signature in black ink that reads "Landmark PLC". The signature is written in a cursive, flowing style.

Little Rock, Arkansas  
March 31, 2025