

FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

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| In the Matter of |) | |
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| SYRINGA BANK |) | |
| BOISE, IDAHO |) | ORDER TO PAY |
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| (INSURED STATE NONMEMBER BANK) |) | FDIC-06-180k |
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SYRINGA BANK, BOISE, IDAHO ("Bank"), has been advised of the right to receive a NOTICE OF ASSESSMENT OF CIVIL MONEY PENALTY, FINDINGS OF FACT AND CONCLUSIONS OF LAW, AND NOTICE OF HEARING ("Notice") issued by the Federal Deposit Insurance Corporation ("FDIC") detailing the violations for which a civil money penalty may be assessed against the Bank pursuant to the Flood Disaster Protection Act ("FDPA"), as amended, 42 U.S.C. § 4012a, section 8(i)(2) of the Federal Deposit Insurance Act ("FDI Act") 12 U.S.C. § 1818(i)(2), and Part 339 of the FDIC Rules and Regulations, 12 C.F.R. Part 339, and has been further advised of the right to a hearing on the alleged charges under the FDPA, 42 U.S.C. 4012a(f), section 8(i) of the FDI Act, 12 U.S.C. § 1818(i), and the FDIC Rules of Practice and Procedure, 12 C.F.R. Part 308.

Having waived those rights, the Bank entered into a STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER TO PAY

("CONSENT AGREEMENT") dated October 20, 2006, with a representative of the Legal Division of the FDIC, whereby, solely for the purpose of this proceeding and without admitting or denying any violations, the Bank consented and agreed to pay a civil money penalty in the amount of \$24,480.00, related to the Bank's failure to place flood insurance on designated loans at the time of the origination of those loans, its failure to obtain adequate insurance on designated loans at the time of the origination or renewal of those loans, its failure to provide timely written notice to borrowers that collateral securing designated loans is located in a designated flood area, its failure to provide written notifications to borrowers concerning the availability of flood insurance, and its failure to follow forced-placement procedures upon becoming aware of either inadequate flood insurance coverage or the lack of flood insurance, as evidenced by the findings of the FDIC's Compliance Examination of the Bank as of March 15, 2006.

After taking into account the CONSENT AGREEMENT, the appropriateness of the penalty with respect to the financial resources and good faith of Respondent, the gravity of the violation by Respondent, the history of previous violations by Respondent, and such other matters as justice may require, the FDIC accepts the CONSENT AGREEMENT and issues the following:

ORDER TO PAY

IT IS HEREBY ORDERED that SYRINGA BANK, BOISE, IDAHO, be, and hereby is, assessed a civil money penalty of \$24,480.00 pursuant to the FDPA, 42 U.S.C. § 4012a, section 8(i)(2) of the FDI Act, 12 U.S.C. § 1818(i)(2), and Part 339 of the FDIC Rules and Regulations, 12 C.F.R. Part 339, the receipt of which is acknowledged.

This Order to Pay shall be effective upon issuance.

Pursuant to delegated authority.

Dated at Washington, D.C., this 5th day of January, 2007.

April A. Breslaw
Acting Associate Director
Division of Supervision
and Consumer Protection