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On November 16th, 2006, three bankers’ banks acquired First St. Louis Securities, Inc. (now First Bankers’ Banc Securities, Inc.).

“The acquisition of an investment company has been beneficial to all organizations involved. It allows MIB to be a “One Source...One Call” correspondent. If you don’t use us today, give us a call. I believe you will be glad you did.”       Matt Sinnett

Celebrating a successful partnership.
Welcome New CBI Member!

Community Bankers of Iowa would like to welcome the following company to the association, and thank them for their support:

Nyemaster Goode PC
CBI holds and sponsors a number of informative and entertaining events throughout the year, intended to educate our members, provide networking opportunities, raise funds for educational and advocacy efforts and support the professional development of Iowa’s community bankers. Below is a schedule of tentative dates for major CBI events being held during 2017. This is not an exhaustive list of all live events, and dates are subject to change.

Find a more comprehensive list of all CBI events, resources and educational programs in our 2017 Annual Planner & Resource Guide. Free copies will be sent to all CBI Members in late December 2016.

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What matters to your bank?

✔ Security
✔ Protecting Customer Information

“Locknet®’s knowledge of the banking industry is invaluable to us. The assistance they provide to us in preparing for our examinations is critical to the success we have had with those exams. They will even talk to the examiners on our behalf if that is necessary. Because we are so prepared that has never been a need. They are dedicated and thorough in everything they do for us.”

— Sean Noonan, President/CEO – Farmers State Bank
Farmers State Bank was chartered in 1895 in Whittemore, IA. Today the bank has three locations – Whittemore, Algona, and West Bend, IA, 21 employees, and $107 M in assets.

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The CBI Education Foundation was formed to help improve the financial literacy of Iowa’s students, to support higher education for Iowa college students and encourage senior level students to consider community banking as a career, to support community bankers’ professional education, and to recognize the accomplishments of community bankers, both to the industry and their communities.

It is the Foundation’s plan to build a self-sustaining source of support for financial education by soliciting both contributions for immediate project funding, and also larger donations to provide for additional funding through investment earnings. The Foundation is an IRS-approved 501(c)(3) organization, governed by the Community Bankers of Iowa Council of Presidents.

Major programs funded by the CBI Education Foundation include:
- Money Smart Week Elementary Poster Contest
- Community Bankers Summer Intern Scholarship Program
- Leaders of Tomorrow Scholarship Program
- Robert D. Dixon Founders Award Program
- Leaders of Tomorrow Up & Coming Banker of the Year Award
- Ongoing educational opportunities for bankers and prospective bankers across Iowa.

Contributions of any size are accepted and encouraged. Various levels of recognition have been established to spotlight those who show enhanced support. Contributions made by both personal and corporate donors are tax deductible to the fullest extent of the law. Also in cooperation with the Community Foundation of Greater Des Moines, donors willing to make an endowment contribution can realize a 25% Iowa state tax credit in addition to deductibility. Contact us for details on this exciting program.

Your donations go right to where they can do immeasurable good in making Iowa’s communities and their banks an ongoing, critical part of everyday life. Never before has there been such a focused effort to support education related to community banking across Iowa. For more information and to find out how you can participate, visit our website.

Would you like to make a tax deductible donation to help ensure the future of community banking in Iowa?

Click here for more information or to download the Brochure and Donation Form.
SIEM Keeps a “Big Eye” on Cyber Criminals

Written By: Steve Smith
EO Johnson

SIEM, not to be confused with “Seim” the language of Papua New Guinea, or a river in the Ukraine, is an acronym for Security Information and Event Management.

SIEM is a complex set of technologies that form a “big eye” in your technical infrastructure watching for every subtle sleight of hand being played by cyber criminals. It’s the big brother to your firewall and antivirus—that provides real-time analysis of security alerts generated by network hardware and applications. It really is complex.

Cybercriminals like simple.

It’s SIEM’s “complexity” that sends the crooks off to find easier jobs. As big banks continue to harden their security—small to midsize banks have become cybercrime’s new sweet spot. As the threats rise, bank examiners are suggesting SIEM. Many smaller banks have been told about SIEM but don’t know how to use it. SIEM is not a simple box that can be dropped in and incident alerts pop out.

Managed Security Service Providers (MSSP) Offer Expertise

Banks are not in the security business, nor can they afford to test out the many SIEM technologies available. Without care and feeding, SIEM is just a log manager.

“Complexity is a big issue, as is issues with cost of ownership. It’s not just an issue of acquiring and installing SIEM. You have to do quite a bit of integration, configuration and ongoing maintenance. And you’ve got to have dedicated resources for it if you want it to be responsive,” says Dean Francis, author of IT Pro Ranking: SIEM.

Some customer focused MSSPs are doing the research. They’re making the investment to test the technologies and find the best SIEM option for their customers. A managed security partner can also add the human expertise needed to interpret SIEM’s core log correlation talent to provide threat information in real time— as it’s happening.

SIEM Needs Attention to be Most Effective

It’s difficult for small to midsize banks to keep up with SIEM logs, catch the irregularities and respond to them appropriately. Looking at the depth of its capabilities, it’s easy to see why.

SIEM logging capabilities include:
• Widespread log collection throughout your network devices, security appliances, databases, workstations and more in your system.
• Real time log correlation that happens in-memory to detect zero-day threat vectors.
• Performance capability to process all time and transaction-based events to provide actionable data and incident awareness.

Logs need analysis. A security partner has quick access to a wealth of historical data, network and user activities for anomalies and patterns that raise red flag in your network—including discovering the root-cause of the threat, breach, failure, or activity that appears to be non-compliant.

Automated quick response actions in SIEM software contains the threats and has even expanded beyond security to cover IT troubleshooting and issue remediation.

Logging analysis software can:
• Send real-time notification and alerts of irregularities in the network.
• Interactively explore historical log data.
• Isolate root-cause threats, breaches, failure, or any other non-compliant activity.
• Perform event forensics to determine what really happened before, during, and after the event.
• Track log activity over time and in context of suspicious events.

One of the key values SIEM brings to banking is regulatory compliance and reporting capability. Be aware that not all SEIM products ensure compliance reporting such as:
• Detailed reports of non-compliant activity and policy violations in your network.
• Historical system-based, user-based and network-based event data for compliance auditing.
• Information on threat responses and mitigation measures used by the system to contain or prevent attacks.

SIEM is the “big eye” watching over your infrastructure. Based on the success of large bank use of SIEM to thwart breaches, it’s time small to midsize banks had the same protection. Partnering with a managed service security provider can be an affordable path to security and your peace of mind.
Everybody knows everybody in a small town. This can create a cocoon of comfort where people think, “Nothing ever happens here.” This familiarity leads to a trust that makes security seem less important. However, that bubble can burst in an instant.

Banks and credit unions in small towns are just as susceptible to criminal threats and activities as those in the bigger cities. Don’t fall into the trap of thinking serious criminal activity is a rare occurrence in a rural area. Here’s what you can do.

Cameras are an obvious first step. Make sure there are plenty of external cameras that can capture a person’s face. A shot of the top of someone’s head doesn’t help as much as a facial picture when it comes to recognition and identification.

Inside the building, those cameras are just as important. Employees likely won’t remember what a criminal looks like after a robbery. The stress of a robbery or the threat of a weapon can lead to tunnel vision. They’re not going to remember details about faces, voices and other identifying features.

At the open and close of business every day, make sure there are at least two staff members at your institution. The old adage, “There’s safety in numbers,” is common for a reason.

You can also make the building safer to open and close just by looking around. Eliminate some of the risk by simply updating the building’s landscaping. Are there bushes or other small structures outside the building where a criminal can wait and hide? If so, get rid of them.

When it comes to observing suspicious behaviors, go with your gut reaction and pay attention to seemingly small details. If it doesn’t feel right, it’s probably not. A lot of times, a criminal may be casing your business for 24 – 72 hours prior to the actual robbery or other crime.

Criminals will sometimes come in the lobby and start asking weird, non-financial questions about armed security and business hours. In some cases, they might just walk in, not talk to any employees and only look for cameras and exit doors. If someone is lingering in the lobby without doing business, if it’s an unfamiliar face, or if he or she keeps hanging around outside, it should send up a red flag.

All of these preventative measures should be paired with a thoughtful program on how employees should deal with hypersensitivity after a crime has occurred. A proper care and assistance program must be in place for their mental and physical health.

If you miss this step, it can cause problems that linger long after an incident. One common issue is called group thinking.

After a traumatic situation, the two or three employees who were at the scene might band together in their hypervigilance because their stress issues aren’t being handled appropriately. This can lead to alienation from the rest of the staff, escalation of their fears and potentially resignation of the employees who went through a disturbing situation.

Don’t lose a valued, 20-year employee because a situation wasn’t handled correctly. That could be decades of staff-member experience washed right down the drain.

So, what’s the best way to deal with these issues? Have a plan and discuss it prior to any incident happening.

Security doesn’t change because of geography or demographics. No matter the size of your institution, investing in the safety and security of your customers and staff is time and resources well spent.

Mike Burke joined the SHAZAM Network with more than 30 years of experience in law enforcement, criminal justice instruction and homeland security. His expertise helps SHAZAM’s clients enhance their security measures and ensure regulatory compliance.
Studies of EMV usage in Europe suggest that the technology stripe cards. It is designed to guard against skimming through an on-card computer chip that creates an encrypted code.

Breaches—particularly digital intrusions—have risen over the past several years. Javelin Strategy & Research estimates more than $112 billion was lost over the past six years due to various forms of fraud and identity theft. There is little reason to believe that such threats will decrease in the near future.

And yet, despite the growth in cyber threats, consumers have high regard for how well financial institutions protect their information and assets. In CSI’s poll, 78 percent of respondents said they either somewhat or strongly agree that their financial institution can protect them from hackers and thieves. These high marks were generally consistent across age, gender and region of respondents’ residence.

In short, financial institutions have done a remarkable job in building trust among consumers in their ability to protect their information and assets, despite increasing global threats. The survey data suggests that organizations should continue these efforts, in particular by focusing on:

- Creating, implementing and regularly auditing security policies and procedures
- Developing a robust risk management program to both prevent and manage risk
- Ensuring effective security training and resources for employees
- Cultivating a culture in which all employees – from front-line staff all the way up to corporate boards – function with a security-first mindset

On another security-related topic, financial institutions also have done an excellent job of educating consumers on EMV or “chip cards.” EMV implementation, which began in 2012 and continues today, aims to create more secure credit card transactions through an on-card computer chip that creates an encrypted code for every transaction. It is designed to guard against skimming and cloning – two of the main threats to conventional, magnetic stripe cards.

Studies of EMV usage in Europe suggest that the technology works. FICO, drawing from Mercator Advisory Group research, expects the technology to reduce fraud losses in the United States possibly to the tune of $700 million annually, as implementation increases.

And, despite the magnetic stripe being the standard for more than 40 years, consumers overwhelmingly trust EMV. A full 82 percent of survey respondents said that they strongly or somewhat agree that chip cards are more secure than mag-stripe cards for in-store transactions. Interestingly, trust in EMV technology appears to rise among respondents as they get older, with 88 percent of respondents age 65 and older saying they somewhat or strongly agree that EMV technology offers a more secure payment method than mag-stripe cards. Confidence in EMV similarly rises with education and income levels.

It should be noted that only 33 percent of all respondents strongly agree that EMV is more secure. This indicates there is still room for consumer education on the topic. Additionally, it might suggest that consumers, who are now starting to see more EMV-enabled terminals at local retailers, are still waiting to experience the full effects of this new technology.

Still, this is good news for financial institutions, which have spent significant time, energy and resources working to educate and familiarize consumers with this new technology. In CSI’s 2016 Banking Priorities Study, more than 60 percent of banking executives polled indicated they intend to increase spending on EMV implementation.

The results of this consumer survey show that funding EMV initiatives has been—and is likely to continue to be—a good investment, given how confident consumers already are in this emerging technology.

So, while consumer trust in EMV technology—and overall security—is healthy, banks must continue to prioritize their implementation of the latest security measures and technologies designed to keep consumer data safe. To read more about consumer attitudes toward cybersecurity and banking as a whole, download CSI’s Executive Report: 2016 Consumer Survey Report.
Why a Compliance Mindset Is Hurting Community Banks

Community bank CEOs are wasting money on compliance. They are spending more than ever, hiring additional risk officers, internal auditors, compliance officers, vendors and consultants. They are checking every box and fulfilling every mandate.

And they are doing it all wrong.

A new study by the Federal Reserve Bank of St. Louis’ supervision division found that spending more on compliance isn’t leading to higher regulatory ratings for the smallest community banks. It isn’t elevating their managing scores, or positioning the bank for success.

And that’s because having a compliance mind-set is a recipe for mediocrity, no matter the size of the bank. The banks that will earn the most leeway with regulators—and maximize value for shareholders—will naturally implement and utilize the tools and processes that are a prerequisite for “compliance” as a critical function of their strategic and capital planning processes.

When that happens, compliance becomes a mere after-thought; something that is more icing on a cake that doesn’t need icing to begin with. This type of approach is actually easy to execute. You don’t need expensive, overrated and highly misleading black-box models and software. You don’t need an entire department dedicated toward enterprise risk management.

What you do need is a cultural mindset, which starts with the CEO. This mindset starts with an objective to use these tools to play offense by seeing problems before they materialize. The CEO then positions the bank to gain a competitive edge, while their competitors (from both an operational and capital markets perspective) get blindsided.

I participated in a panel this month with regulators from the Office of the Comptroller of the Currency and the Federal Deposit Insurance Corp. at the New York Bankers Association Financial Services Forum. The topic was how best to manage commercial real estate concentrations.

Part of the discussion revolved around the role of stress testing, which can be critical to showing examiners that a bank has enough capital to handle a risky portfolio.

Stress testing is a great tool for the job, but it’s a tool, not the job. Banks that simply submit stress tests to regulators as evidence that they can manage a loan portfolio aren’t going to get what they want.

Instead of viewing stress tests as an end game, bank CEOs need to think of them as tools to provide insights. Reports must be discussed at the board level and understood by the highest levels of management. And then the bank must adjust its strategy if the tests show a potential problem.

The trick to compliance is to not treat it as a compliance exercise. A bank CEO must say, I am going to use this as a strategic planning tool. A CEO cannot give a stress test to the chief risk officer and say make the problem go away. CEOs must look at the results, understand them and use them to adjust their strategic thinking.

A funny thing happened when I began talking about compliance on the New York Bankers Association panel. The regulators nodded their heads in agreement.

Adam Mustafa is Co-Founder and Managing Partner at Invictus Consulting Group. For more information on CBI Affiliate Member Invictus Consulting, visit invictusgrp.com.
Today’s community bank compliance officer is charged with staying current with all the compliance rules and regulations and making sure they are being used effectively within the bank. For 14 years, the Community Bankers of Iowa has partnered with Community Bankers for Compliance (CBC), a program that offers the tools and information needed to implement compliance throughout your bank. The complexity regulatory changes makes it critical that your compliance officer is ready to deal with these changes as they occur.

The CBC program is the most successful and longest running compliance training program in the country and provides up-to-date information on compliance issues and developments in bank regulations, as well as proven techniques for maintaining your in-bank compliance program. Having received approval from regulatory agencies, the program has been instrumental in helping over 2,000 community bankers across the nation develop an increased understanding and ability to deal with regulatory issues.

Annual membership to the CBC Program includes five inter-related compliance services:

1. **Live Regulatory Seminars.** Two live seminars are provided throughout the year. A detailed manual is provided to each participant.

2. **Webcasts - Regulatory Update.** Four regulatory update sessions are presented in webcast format on separate days. Each webcast discusses current news and regulatory changes that may have an impact on community banks. Each webcast will be 1.5 hours, including questions and answers. A detailed manual, written in full narrative, will be provided.

3. **Monthly Newsletter.** The Compliance Update newsletter is sent to program members each month. It provides an update of compliance issues that impact community banks.

4. **Compliance Hotline.** Members of the program may visit Young & Associates’ website or call their toll-free number for compliance officer questions that arise on a daily basis. This service ensures that your bank is just a phone call away from the information you need in order to answer your compliance questions.

5. **CBC Members-Only Web Page.** This dedicated web page is reserved for banks that are registered members of the Community Bankers for Compliance Program. In it you will find special and timely information and tools that can be used to enhance the regulatory compliance function at your bank.

For more info or to register for the Community Bankers for Compliance program, visit our website at cbiaonline.org or contact Pretty Patel at 515.453.1495 or ppatel@cbiaonline.org.
Sowing the Grassroots

ICBA’s advocacy director looks to foster a culture of advocacy

New ICBA Director of Advocacy Joshua Habursky recently joined ICBA to head up grassroots outreach and has been working to expand community bank engagement with their lawmakers and federal regulators. ICBA sat down with him to see how it’s going.

IB: How are you settling in at ICBA?

Habursky: Very nicely. ICBA has a great infrastructure in place and a lot of active advocates among community bankers. So that’s an excellent place to start. My goal is to build on what we’ve achieved so the community banking industry continues to have a powerful grassroots presence in Washington.

IB: How?

Habursky: First we need to ensure we’re maximizing the potential of our industry to engage policymakers with a loud, clear and collective voice. There’s no doubt that we have many community bank executives who closely track policy issues and actively reach out to representatives in Washington. We want to see that same level of passion extend throughout the bank—to staff members at every level, as well as bank directors.

“When lawmakers have questions about banking issues, the community banks in their states and districts should be their first points of contact.”

- Josh Habursky, ICBA director of advocacy

When Congress or the regulators are considering a policy initiative that affects community banks, everyone in the industry should be engaged, because everyone is affected. Community banks employ 700,000 Americans, so we need to tap as many of them as possible to make sure Washington is listening.

IB: Are there any other ways to build on our grassroots efforts?

Habursky: We have an opportunity to engage customers who have a stake in the public policy process, including small-business owners. Community banks have close relationships with customers who often go back many years, so we need to engage those allies who are committed to local banking. Anyone with an interest in promoting community banks can be an ICBA advocate.

IB: How important is grassroots to ICBA’s policy goals?

Habursky: It’s absolutely essential! Lawmakers seek out reliable and trusted sources for information as they make key policy decisions, and they are particularly interested in the views of their constituents. I mean, lobbyists can provide good information, but members of Congress want to hear from the voters who determine whether they stay in office.

So community bankers should be their representatives’ primary source of information on community banking—period. When lawmakers have questions about banking issues, the community banks in their states and districts should be their first points of contact. If we’re not, then we’re not exercising our voice on issues that affect our businesses and livelihoods.

IB: What are the important grassroots issues this fall?

Habursky: Obviously we’re going to be pushing our regulatory relief agenda. We’d like to build on our successes from the end of last year by advancing more provisions from the ICBA Plan for Prosperity regulatory relief legislative agenda. That includes bills supporting relief from Basel III, mortgage rules, the call report. There’s a lot in play.

Meanwhile, we’re going to try to make progress on stricter data-security standards for merchants, build support for a repeal of debit interchange price controls, and fend off pushes from the credit unions and Farm Credit System. So we have our work cut out for us.

IB: All right, so what’s the best way to get involved?

Habursky: A quick and easy way to start is by filling out the “Become an ICBA Advocate” form on ICBA’s Be Heard grassroots website, at www.icba.org/beheard. Those who sign up will receive periodic action alerts asking them to reach out to their elected officials on pressing issues facing the industry.

The next step is to take action. That means making the phone call when it counts, sending the email or tweet, or even meeting in person with lawmakers as an ICBA advocate. This might be old hat for many community bankers out there, but we need as many people in this industry as possible to get involved. So let’s also encourage colleagues, employees, directors and even customers to join us.

ICBA will be providing many new resources, training sessions and interactive content to help bolster our grassroots efforts and give already-active ICBA advocates the platform to recruit others. There’s plenty for us to fight for, so we need to create an industrywide culture of advocacy.

IB: Any final bit of advice for readers?

Habursky: Yes—call me. Community bankers are welcome to contact me directly at joshua.habursky@icba.org or (202) 821-4355. Grassroots is all about communication, so I welcome questions, comments and feedback any time.
On Bad-News Banks
Written By: Rebeca Romero Rainey, Chairman of ICBA

Disheartened and upset. I used those words to describe how I felt about the Wells Fargo scandal when I was recently interviewed by CNBC’s Steve Liesman. While at the Federal Reserve Bank of Kansas City’s forum for minority bankers, I told him that it was so upsetting to think that anywhere in America consumers could be taken advantage of like that.

When Liesman asked if something like this could happen at a community bank, I immediately said, “No, it would not happen at a community bank, and that’s the difference.”

I explained that at my community bank, I’m an active part of the community and that we work hard to build trust and relationships with our customers. I also know that if something like this were to happen at a community bank, that bank and its executives would be held strictly and personally accountable for overseeing a culture that allowed such abuses to happen.

Yet again, here amid the chaotic news cycle, we see a bright line that distinguishes the large systemically risky megabanks like Wells Fargo from the thousands of community banks across the country. It’s unfortunately events like these scandals that show everyone just how different our business models and playing fields truly are.

But community bankers have the upper hand, if we only play our full hand. We have the customer relationships, we have a time-tested business model that works, we have the sterling reputation all on our side. So let’s take those positives and counter the bad megabank news with our message—the community bank message.

ICBA is with you every step of the way. After all, distinguishing “community banks” from merely “banks” is what your national association is all about. That’s why ICBA exists, because it serves community banks and only community banks. That’s also why ICBA has created marketing and communications resources designed for community banks. ICBA’s Go Local initiative is a perfect example of educating consumers about the power of local community banks. The initiative ultimately helps consumers connect the dots between community banks and how they help their local customers and communities thrive.

“We have the customer relationships, we have a time-tested business model that works, we have the sterling reputation all on our side.”

Think of Go Local in terms of the farmer’s market movement. Does an apple taste better from a local farm or from one seven states away? We all know that answer, and community banking is the same. It’s much sweeter to know your banker and know where your money is going, Is it going to fund big-box businesses seven states away, or is it going to a local entrepreneur who wants to open up a business on Main Street? We all know where we stand.

I encourage you and your customers to spread the Go Local community bank message, if you aren’t already. Make “local” part of your narrative. Local matters. Community banks matter. We are different. It’s times like these when we need to communicate and explain just a little more.

Consumers are listening and they want alternatives to the bad-news banks. Let’s give them a ray of hope in the banking world. Let’s give them community banks.

Rebeca Romero Rainey is chairman and CEO of Centinel Bank of Taos, in Taos, N.M.
Here we go again. Another megabank scandal has stunned ICBA and the nation’s community bankers, who are working to ensure the negative backlash from outraged consumers and policymakers does not rub off on their local institutions. Not only did Wells Fargo violate the trust of its customers by opening as many as two million unwanted accounts, the top executives at the nation’s second-largest bank have generally refused to accept full accountability as Washington considers a policy response.

Although Wells Fargo’s now-retired chief executive, John Stumpf, has directed blame toward the 5,300 employees the bank fired for following its crooked sales practices (or else, paradoxically, be fired), his banking industry allies have responded by merely condemning dishonest or unethical behavior at “any bank, anywhere, any time.” But this fraud and its potentially industry-shaking regulatory aftermath cannot be laid at the feet of anyone other than the $2 trillion-asset institution that perpetrated it. It certainly shouldn’t punish or burden community banks that had nothing to do with the fraud.

Nevertheless, the Wells Fargo scam poses a grave threat to our industry. Community bankers have been down this road before, and it doesn’t end well. We have seen over and over how megabank misdeeds result in dramatic new regulatory demands—not on the perpetrators, but on us. Again and again, systemically risky institutions have made reckless decisions, harmed consumers and wrought a broad-brush policy response that trickles down on community banks.

So ICBA is working diligently to ensure that Washington policymakers and the American public clearly distinguish between community banks and systemically risky, too-big-to-manage institutions. In face-to-face meetings, written communications and media coverage, we have called on Congress and the regulatory agencies to avoid the kinds of overreaching laws and regulations enacted after the financial crisis, which disproportionately affected local institutions.

Furthermore, the Wells Fargo fraud should not inhibit the passage of bills containing tailored regulatory relief for community banks. Much-needed legislation inspired by ICBA’s Plan for Prosperity remains before Congress this very moment, and Wells Fargo should not be allowed to stall its momentum.

Washington can and must be able to differentiate between relationship lenders, who are held directly accountable to their customers, and the megabanks, whose impersonal, transaction-based business model too often exploits consumers and puts the financial system at risk. That is why, of course, ICBA has long advocated a system of tiered and proportional regulation based on an institution’s size and risk. With the Wells Fargo scandal putting immense pressure on policymakers to mount a regulatory response, this tailored approach to regulation has never been more important.

Just as community banks are accountable to their local communities, ICBA takes responsibility for exclusively representing community banks, not the megabanks that make our lives more difficult. Therefore, we will stand up for community banks every step of the way. We must ensure that we are neither tarnished by this scandal nor roped into an unwarranted and burdensome regulatory backlash. Instead, through tailored and proportional regulatory standards, we can fix what’s wrong with our banking system by strengthening what’s right with it—community banks.

Following Mr. Fine
More than 1,000 people are following Camden Fine’s tweets @Cam_Fine—are you? Visit www.twitter.com/cam_fine.
Push and Pull
Two-sided SBA market doubles your chance for success

Rufus Thomas, the late R&B impresario whose hit list included “The Funky Chicken” and “Walking the Dog,” was not known to be a market maker of Small Business Administration (SBA) 7(a) loans. It’s ironic, then, that he was talking about the two-sided benefits of both lending and investing in these products when he released his 1970 hit “Push and Pull.”

Hundreds of community banks have learned that this strategy can satisfy several needs on their balance sheets and income statements. The loan department makes quality loans, which are usually 75 percent guaranteed by the federal government, in many cases to borrowers that are outside the community bank’s traditional lending grid. The investment portfolio manager buys zero percent risk-weighted assets that are true floating rate instruments backed by these loans, at yields that far exceed other money-market alternatives. As Rufus himself might have said, “Let’s boogie!”

Hit it
The 7(a) program has grown exponentially in the last four years as the economy has expanded and borrowers have improved their own balance sheets. In Fiscal Year 2017 the SBA estimates that there will be requests for $29 billion in guarantees, up from $17 billion in 2013.

The growth in the program has had no impact on the national debt. The 7(a) program is “zero subsidy,” meaning that the fees charged the borrowers cover the costs of administration. That is a major reason the government has gradually approved larger appropriations. Of course, supporting private enterprise has been a hallmark of community banking for generations.

These loans are almost all floating rate tied to the prime rate. Borrowers’ rates can range from 1.00% to 2.75 percent over prime, and loan terms will vary based on use of proceeds. Working capital credits can be seven- to ten-year terms, while real estate-backed loans can be as long as 25 years.

About half of these loans are sold into a lucrative secondary market. The lender/seller is required to retain servicing (with a 1.00 percent servicing fee), as well as the full unguaranteed portion. The sale of the loan is not visible to the small business owner since monthly payments continue to be made to the originating community bank.

Pick up the beat
The sale of the loans is really just a step in the procession. The reason a community bank is able to sell its guarantees at 10
percent premiums and higher is that there are ready buyers of the securities collateralized by these small business loans. A consortium of poolers buys the loans and aggregates them into groups of homogenous maturities, then issues Guaranteed Loan Pool Certificates (GLPCs) backed by the U.S. government.

GLPCs have some obvious and tangible benefits for community bank bond portfolios. As mentioned they’re floating rate, so the risk metric known as “effective duration” is very short. These securities are fairly liquid and pledgeable. They have monthly principal and interest cash flow which further helps manage interest rate risk. Finally, the yields for these have been near that of a three-year Treasury note, in spite of their (usually) quarterly reset window.

Big finish
Let’s walk our way through an example. Currently, 10-year prime plus 2.00 percent loans can be sold to a pooler at a price of about 108.50. You, the lender/seller, would keep the 25 percent unguaranteed portion, and you would retain 1.00 percent of the guaranteed balance as servicing income. (Longer loans and those with higher note rates will have higher prices.) The premium represents gain recognized immediately on sale date.

Once an aggregator has accumulated enough 10-year loans to issue a security, it will do so at a price of about 109.00. (SBA requires a pool to have at least 4 loans and a face of at least $1 million, although most securities have a multiple of both.) The investor assumes one major risk: that the loans behind the pool prepay sooner than expected. This is why it’s vitally important for the buyer to examine detailed loan listings made available by the pooler, which is effectively the DNA. Generally, these investments will produce a yield that is about 100 basis points (1.00 percent) above the effective fed funds rate.

Seeking participants
This column barely scratches the surface of this subject. It is significant, though, that the number and dollar amount of (a) loans being made, and the number of community banks that own GLPCs, have skyrocketed in the last decade. That is argument enough of the benefits seen by the thousands of participants in the push and pull of this two-way market.

Jim Reber is president and CEO of ICBA Securities and can be reached at 800-422-6442 or jreber@icbasecurities.com. Arne Monson is president and CEO of Holtmeyer and Monson, the ICBA’s endorsed lender service provider and can be reached at 800-340-7304 or aamonson@holtandmon.com.
OMAHA, Neb. – The Creighton University Rural Mainstreet Index sank for September and remained below growth neutral for the 13th straight month, according to the monthly survey of bank CEOs in rural areas of a 10-state region dependent on agriculture and/or energy.

September Survey Results at a Glance:
• For a 13th straight month, the Rural Mainstreet Index fell below growth neutral.
• Almost 4 of 5 bank CEOs indicated restructuring farm loans due to weak farm income.
• Farmland prices remained below growth neutral for the 34th consecutive month.
• Almost one-fifth of bankers reported increasing rejection rates on agricultural loans due to weak farm income.

OMAHA, Neb. – The Creighton University Rural Mainstreet Index sank for September and remained below growth neutral for the 13th straight month, according to the monthly survey of bank CEOs in rural areas of a 10-state region dependent on agriculture and/or energy.

Overall: The index, which ranges between 0 and 100 fell to 37.3 from 41.1 in August. This month’s reading is well off the index for September 2015 when it stood at 49.0.

“According to the USDA, 2016 net farm income is expected to decline by almost 12 percent from 2015 levels. Even with an anticipated 25 percent increase in government support payments for 2016, the Rural Mainstreet economy continues to falter according to our surveys of bankers,” said Ernie Goss, Jack A. MacAllister Chair in Regional Economics at Creighton University's Heider College of Business.

“Even though loan defaults have changed little over the past year, downturns in farm income over the past three years are pushing bankers to change the terms of farm loans. According to Creighton’s September survey, almost four of five, or 79.1 percent, of bank CEOs reported a significant upturn in loan restructuring due to weak farm income,” said Goss.

Jim Eckert, president of Anchor State Bank in Anchor, Illinois, expects lower agriculture commodity prices to cause all but the best capitalized producers to only break even or lose money for 2016.

Farming and Ranching: The farmland and ranchland-price index for September expanded to a frail 30.3 from 25.6 in August. This is the 34th straight month the index has languished below growth neutral 50.0.

The September farm equipment-sales index sank to 14.3 from August’s 14.8. “Weakness in farm income and low agricultural commodity prices continue to restrain the sale of agriculture equipment across the region. This is having a significant and negative impact on both farm equipment dealers and agricultural equipment manufacturers across the region,” said Goss.

October Survey Results at a Glance:
• For a 14th straight month, the Rural Mainstreet Index fell below growth neutral.
• Overall index slumps to lowest level since April 2009.
• Bank CEOs project more than one in five farmers with negative 2016 cash flows.
• More than one in four bank CEOs expect rising regulatory costs to be the biggest challenge to their bank operations over the next 5 years.
• Gains reported for Colorado, Iowa, Nebraska and South Dakota while losses were recorded for Illinois, Kansas, Minnesota, Missouri, North Dakota and Wyoming.

OMAHA, Neb. – The Creighton University Rural Mainstreet Index sank for October and remained below growth neutral for the 14th straight month, according to the monthly survey of bank CEOs in rural areas of a 10-state region dependent on agriculture and/or energy.

Overall: The index, which ranges between 0 and 100 fell to 31.8 from September’s 37.3. This month’s reading is the lowest recorded since April 2009.

“Over the past 12 months, livestock commodity prices have tumbled by 19.7 percent and grain commodity prices have slumped by 18.5 percent. The economic fallout from this price weakness continues to push growth into negative territory for six of ten states in the region,” said Ernie Goss, Jack A. MacAllister Chair in Regional Economics at Creighton University's Heider College of Business.

Jon Schmaderer, president of Tri-County Bank in Stuart, Nebraska said, “The calf market has now officially followed suit with grain and other livestock pricing declines.” Another bank CEO reported calf prices are going to be down 30 to 40 percent, which will have a large downward economic impact.

Bank CEOs project that more than one in five grain farmers, or 21.6 percent, will suffer negative cash flows for 2016. “This is 2.0 percent higher than the July 2016 projection when the same question was asked,” said Goss.

Farming and Ranching: The farmland and ranchland-price index for October fell to 25.0 from September’s 40.3. This is the 35th straight month the index has languished below growth neutral 50.0.

The October farm equipment-sales index sank to 13.1 from September’s 14.3. “Weakness in farm income and low agricultural commodity prices continue to restrain the sale of agriculture equipment across the region. This is having a significant and negative impact on both farm equipment dealers and agricultural equipment manufacturers across the region,” said Goss.
Tables 1-3 summarize survey findings (click each table to view larger):

### Table 1: Rural Mainstreet Economy September/October 2016: One Year Ago and Last Two Months
(index > 50 indicates expansion)

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<tbody>
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<td>Area economic index</td>
<td>49.0</td>
<td>44.4</td>
<td>41.1</td>
<td>37.3</td>
<td>31.8</td>
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<tr>
<td>Loan volume</td>
<td>72.0</td>
<td>71.6</td>
<td>78.3</td>
<td>72.1</td>
<td>71.6</td>
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<td>Checking deposits</td>
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<td>51.2</td>
<td>41.3</td>
<td>50.0</td>
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<td>Certificates of deposit and savings instruments</td>
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<td>40.9</td>
<td>44.5</td>
<td>51.5</td>
<td>40.9</td>
</tr>
<tr>
<td>Farmland prices</td>
<td>35.5</td>
<td>31.0</td>
<td>25.6</td>
<td>30.3</td>
<td>25.0</td>
</tr>
<tr>
<td>Farm equipment sales</td>
<td>14.2</td>
<td>10.8</td>
<td>14.8</td>
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<tr>
<td>Home sales</td>
<td>56.4</td>
<td>58.1</td>
<td>58.9</td>
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<td>50.1</td>
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<tr>
<td>Hiring</td>
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<td>52.4</td>
<td>47.9</td>
<td>54.8</td>
<td>45.4</td>
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<tr>
<td>Retail business</td>
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<td>44.4</td>
<td>38.1</td>
<td>33.4</td>
<td>36.3</td>
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<tr>
<td>Confidence index (area economy six months out)</td>
<td>43.8</td>
<td>42.1</td>
<td>27.2</td>
<td>21.5</td>
<td>21.6</td>
</tr>
</tbody>
</table>

### Table 2: The Rural Mainstreet Economy September 2016

<table>
<thead>
<tr>
<th></th>
<th>Unchanged</th>
<th>Up 1% - 9%</th>
<th>Up 10% - 20%</th>
<th>Up More than 20%</th>
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</thead>
<tbody>
<tr>
<td>Regarding farm loan defaults in your area over the LAST year, defaults are:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>62.8%</td>
<td>34.9%</td>
<td>2.3%</td>
<td>0.0%</td>
</tr>
</tbody>
</table>

Which of the following has been your bank’s response to weak farm income? (more than one may apply):

|                                      | 7.0%      | 9.3%       | 11.6%        | 18.6%            | 79.1%        |
|                                      |           |            |              |                  |              |

### Table 3: The Rural Mainstreet Economy October 2016

|                                      | 1% - 4%   | 5% - 14%   | 15% - 24%    | 25% - 29%        | Over 29%     |
|                                      |           |            |              |                  |              |
| What percentage of grain farmers in your area are projecting negative cash flow for 2016? | 2.3%      | 25.6%      | 39.6%         | 9.3%           | 23.3%        |

|                                      | Farm foreclosures | Rising competition from Farm Credit & Credit unions | Sinking Farmland prices | Recession | Rising Regulatory costs | Other |
|                                      |                   |                                                      |                          |           |                          |       |
| Regarding farm loan defaults in your area over the next year, what do you expect? | 9.1% | 9.1% | 11.4% | 25.0% | 27.3% | 18.1% |

For historical data and forecasts, visit: [www.creighton.edu/economicoutlook](http://www.creighton.edu/economicoutlook)
For ongoing commentary on recent economic developments, visit: [www.economictrends.blogspot.com](http://www.economictrends.blogspot.com)
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**CBI SERVICES AND INSURANCE - ENDORSED MEMBERS**

**Bankers Solutions**
Tom VandeKamp
2700 Patricia Drive
Des Moines, IA 50322
Phone: 515-276-8512
Fax: 515-276-8557

**Computer Services Inc.**
Bill Evers
Phone: 800-545-4274 ext 19224

**Deluxe Financial Services**
Jeff Curran
1615 Audubon Drive
Waterloo, IA 50701
Phone: 800-332-4234 ext. 159068

**EMC**
Derek Bleil
717 Mulberry
Des Moines, IA 50309
Phone: 515-345-2503
www.emcins.com

**Equips**
Steve Van Eerden
3470 N. 127th St.
Brookfield, WI 53005
Phone: 262-223-6087
Fax: 262-373-0553

**Executive Benefits Network**
Pat Marget
626 E. Wisconsin Ave, Ste 1000
Milwaukee, WI 53202
Phone: 800-780-4326

**ICBA Bancard**
Tina Giorgio, President & CEO
1615 L. Street, Suite 900
Washington, DC 20036
Phone: 800-242-4770
Fax: 703-841-5103

**ICBA Reinsurance**
Mike Miller, President
Unified Financial Services
Agent of ICBA Reinsurance
216 Sycamore Street, Suite 510
Muscate, Iowa 52761
563-288-2433 Office
563-260-1126 Cell

**ICBA Securities/Vining Sparks**
Jim Reber, President & CEO
Gray Allison, Jon Pence
Jonathan Ferebee, Oliver Wade
775 Ridge Lake Blvd, Suite 175
Memphis, TN 38120
Phone: 800-422-6442
Fax: 901-762-5333

**Investment Professionals, Inc.**
Dave Doerflinger
16414 San Pedro Avenue, Suite 300
San Antonio, Texas 78232
Direct: 210-542-0191
Phone: 210-308-8800
Toll Free: 1-800-593-8800
Fax: 210-308-8707

**ProfitStars**
John Yanacek
1021 Central Expwy South
Allen, TX 75013-2790
Phone: 615-250-2111

**SHAZAM**
Jim Ghiglieri
Dan Kramer
6700 Pioneer Parkway
Johnston, IA 50131-1605
Phone: 515-288-2828
Toll Free: 800-844-5493

**Storey Kenworthy**
Lincoln Dix
Jessica Bartels
1333 Ohio Street
Des Moines, Iowa 50314
515.558.6059

**UPS**
Josh McCabe
Phone: 314-344-3686

**Young & Associates Inc.**
Anne Coyne
121 E Main St
Kent, Ohio 44240
Phone: 330-678-0524

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CBI SERVICES AND INSURANCE - AFFILIATE MEMBERS

21st Century Financial Services
Tanna Faulkner, Sr. Vice President
National Sales
Johannah Moore, Sales Specialist
10711 Burnet Rd., Ste. 306
Austin, Texas 78758
Phone: (512) 490-2542

Adrenaline
Joe Walker, Vice President
Business Development & Account Mgmt
3405 Piedmont Road NE, Suite 300
Atlanta, Georgia 30305
Phone: (404) 252-9995
Fax: (404) 843-2939
Mobile: (314) 440-7204

American Mortgage & Equity Consultants
Steve Greig, Branch Manager
3303 109th St
Urbandale, IA 50323
Phone: (515) 274 - 8504
Fax: (515) 313-0833

AmTrust North America
Matt Craven
800 Superior Avenue E
Cleveland, OH 44114
Phone: (216) 643-5884

Atris Technology
Scott McElhiney, Sales Manager
3405 NW 97th Blvd, Suite A-200
Gainesville, FL 32606
Phone: (352) 331-3100

Baird Holm, LLP
Jonathan Wegner, Attorney
Steven Turner, Attorney
1700 Farnam Street
Omaha, Nebraska 68102
Phone: (402) 344-0500
Fax: (402) 344-0588

The Baker Group
Charlie Amis
1601 NW Expressway, 20th Floor
Oklahoma City, Oklahoma 73118
Phone: (405) 415-7200

BancVue
Jason Ryskamp
VP - Senior Regional Director
Vickie King-Ganrude
VP - Regional Director
4516 Seton Center Pkwy Ste 300
Austin, TX 78759-5272
Phone: (877) 342-2557
Fax: (512) 795-9488

Bank Compensation Consulting
Rob Barton, Senior Consultant
1255 W. 15th St., Suite 830
Plano, TX 75075
Phone: (972) 781-2020
Fax: (972) 398-3009

BankOnIt
Roger Claypool
8601 Commerce Park Dr
Oklahoma City, OK 73132
Phone: (800) 498-8877

BCC Advisers
Lindy Ireland, Director
1707 High Street
Des Moines, IA 50309
Phone: (515) 777-7071

BFS Group
Bank Financial Services Group
Mark A. Blake,
Regional Managing Director
8000 W 78th Street, Suite 100
Edina, Minnesota 55439
Phone: (800) 931-7782
Fax: (952) 828-0893

BOK Financial Services, Inc.
Marc Gail, Vice President
Mark Khariou, Vice President
1200 North Mayfair Road, Suite 303
Milwaukee, WI 53226
Phone: 866-440-6515
Fax: 414-203-6565

Cain Ellsworth & Company, LLP
Shane Jager, CPA
1008 3rd Avenue
Sheldon, Iowa 51201
Phone: (712) 324-4614

CFC Technology Corporation
Jim Brummer
212 3rd Ave., North Ste 415
Minneapolis, MN 55401
Phone: (763) 235-5300

CliftonLarsonAllen, LLP
Roger Jones, Principal
5550 Wild Rose Lane, Suite 300
West Des Moines, Iowa 50266-5304
Phone: (515) 222-4400
Fax: (515) 222-4444

Convergint Technologies
Scott Swansen, Regional Vice President
201 Shurfine Drive, Suite 3
Ankeny, Iowa 50021
Phone: (877) 990-9430

Corporate Contracts
Randy Roth, Managing Partner
1200 Valley West Dr, Suite 500
West Des Moines, IA 50266
Phone: (515) 309-5600
Mobile: (515) 360-0283

Country Banker Systems
Tim Ohlde, CEO
328 Washington
Clyde, KS 66938
Phone: (800) 780-5479
Fax: (785) 446-3654

D+H
Jim Beran, Sr. Sales Executive
Pete Smith, National Sales Manager
12080 North Corporate Parkway
Mequon, WI 53093
Phone: 262-292-0870
Fax: 262-292-0970

Data Business Equipment
Toby Geiger, President
Josh Banta, Vice President
10315 Buena Vista Court
Urbandale, Iowa 50322
Phone: (515) 254-1122
Fax: (515) 254-0299
Toll Free: (800) 373-3000

Dickinson Mackaman
Tyler & Hagen PC
Howard Hagen
699 Walnut Street, Suite 1600
Des Moines, Iowa 50309
Phone: (515) 244-2600

Eide Bailly LLP
Rhea Hemish, CPA, Partner
1911 Excel Drive
Mankato, Minnesota 56001
Phone: (888) 777-2015
Fax: (507) 387-6436
CBI SERVICES AND INSURANCE - AFFILIATE MEMBERS

EO Johnson - Locknet IT Solutions
Brooke Schmaltz
3310 South Kinney Coulee Road
Onalaska, WI 54650
Phone: (800) 967-2645
Fax: (608) 785-7180

EPCOR
Jennifer Kirk
3100 Broadway Blvd, Suite 555
Kansas City, MO 64111
Phone: (800) 967-2645
Fax: (608) 785-7180

Equias Alliance LLC
Eric Hilgenberg, Client Relationship Mgr
18526 Judicial Road
Prior Lake, Minnesota 55372
Phone: (952) 435-7737
Fax: (952) 435-7787

Executive Compensation Institute
Tom Lynch
1650 West 82nd Street, Ste 850
Minneapolis, MN 55431
Phone: (800) 895-1363

Expense Reduction Analysts
Deonna Fritz, Director
237 Clark Drive
Cedar Falls, Iowa 50613
Phone: (319) 240-1919
Fax: (319) 378-0460

Farmer Mac
Mark Rickels
1999 K Street, NW, 4th Floor
Washington, D.C. 20006
Phone: (202) 872-7700

Federated Investors
Milton E. Klohn
600 Inwood Avenue N
Oakdale, Minnesota 55128
Phone: (651) 748-4803
Fax: (651) 748-4817

FIPCO
Pam Kelly, President
Phone: (608) 441-1234
Art Weber, Director - Sales
Phone: (608) 441-1254
4721 South Blitmore Lane
Madison, WI 53718
Main Phone: (800) 722-3498
Fax: (608) 661-9382

First Bankers’ Banc Securities Inc.
A.W. Spellmeyer, President
Main Office:
1714 Deer Tracks Trail, Suite 110
St. Louis, MO 63131
Kansas City Office:
6800 College Blvd., Ste. 420
Overland Park, KS 66211
Phone: (888) 726-2880
Fax: (314) 863-1721

First Data Online Banking
Jason Weida
14109 Haskins Street
Overland Park, KS 66221
Phone: (913) 375-6117

Fiserv
Steve Turner
255 Fiserv Drive
Brookfield, WI 53045
Phone: (800) 872-7882

Fredrikson & Byron, P.A.
(Denver Office)
Marc Ward, Attorney
309 E 5th St, Ste. 202A
Des Moines, Iowa 50309
Phone: (515) 242-8940
Fax: (515) 242-8950

(Minneapolis Office)
Beau Hurtig, Attorney
200 South Sixth St., Ste. 4000
Minneapolis, Minnesota 55402
Phone: (612) 492-7267
Fax: (612) 492-7077

FRSecure
Jon Anderson, VP of Sales & Marketing
Robb Stiffler, Director of Marketing & Partner Development
141 W. 1st St, Suite 300
Waconia, MN 55387
Phone: (888) 676-8657

Glory Global
Jeff C. Glantz, Account Manager
James McAllister, Vice President, Sales
3005 Pinney Woods Ct. SE
Cedar Rapids, Iowa 52403
Telephone - Jeff: (319) 369-0295

IBA Securities - Broker Dealer Financial Services Corp.
Cody Phelps, Relationship Manager
140 S. 68th Street, Suite 2200
West Des Moines, IA 50266
Phone: (844) 468-5800 or (515) 727-6717

Inspired Financial Services
John Stull, Vice President
410 Main St.
Reinbeck, IA 50669
Phone: (319) 268-7149

The Invictus Consulting Group, LLC
Jeremy Kowalski, Sales Director
2 Nelson Street
Stanford, CT 06902
Phone: (860) 919-2813

Iowa Business Growth Company
Daniel Robeson, EVP
5409 NW 88th Street, Ste 100
Johnston, IA 50131
Phone: (515) 223-4511

Iowa Finance Authority
Steve Ferguson
5409 NW 88th Street, Ste 100
Johnston, IA 50131
Phone: (515) 725-4900

Iowa Land Records
Lisa Long, Account Manager
Phil Dunshee, Project Manager
8711 Windsor Pkwy, Suite 2
Johnston, IA 50131
Phone - Lisa: (515) 447-4157
Phone - Phil: (515) 309-0144

Iowa Student Loan
Steve McCullough, President and CEO
Suzanne Lowman, Exec. Lender Liaison
Ashford II Building, 6775 Vista Drive
West Des Moines, Iowa 50266-9305
Phone: (515) 243-5626

KBS - Kansas Bankers Surety
Paul R. Bures, Vice President
1220 SW Executive Drive
P.O. Box 1654
Topeka, Kansas 66601
Phone: (785) 228-0000
Fax: (785) 228-0079

KPMG LLP
Mark Dicken, Mike Wiskirchen
666 Grand Avenue, 2500 Ruan Center
Des Moines, IA 50309
Phone: (515) 725-4900

Kirk Gross Company
Chuck Yagla
4015 Alexandria Drive
P.O. Box 2097
Waterloo, Iowa 50704
Phone: (319) 234-6641
Fax: (319) 234-7901

KPMG LLP
Mark Dicken, Mike Wiskirchen
666 Grand Avenue, 2500 Ruan Center
Des Moines, Iowa 50309
Phone: (515) 288-7465
Fax: (515) 280-3202
LSB Wholesale
Jordan Schick, VP Manager
999 Home Plaza, Suite 301
Waterloo, IA 50701
Phone: (319) 433-3777
Fax: (319) 433-3977

Mattan Pratt Consulting LLC
Becky Pratt, President/Owner
524 S. Delaware St
Boone, IA 50036
Phone: (515) 689-2114

MIB Banc Services, LLC
Holly House, President
910 Weathered Rock Road
Jefferson City, MO 65110
Phone: (888) 818-7206
Fax: (573) 635-3504

Northland Securities, Inc.
Linda Knutson
45 South 7th Street, Suite 2000
Minneapolis, Minnesota 55402
Phone: (612) 851-5992

Promontory Interfinancial Network
Brad Cole
1515 N. Courthouse Road, Suite 1200
Arlington, VA 22201
Phone: (402) 212-4145

Raymond James
Fixed Income Securities
Leila Coggins
50 N. Front St, 13th Floor
Memphis, TN 38103
Phone: (901) 579-4392 or (901) 531-3347
Fax: (901) 524-4189

Roth & Company, PC
Les Heimsoth and Tim Breitbach
666 Walnut Street, Suite 1450
Des Moines, Iowa 50309
Phone: (515) 244-0266

RSM US LLP
Jeffery Baker
Paul Cain
400 Locust Street, Suite 640
Des Moines, Iowa 50309
Phone: (515) 284-8660

Sentry Networks
Tom Weaver, President
2310 SE Delaware, Suite G PMB238
Ankeny, Iowa 50023
Phone: (888) 878-8854

SHAZAM Core Services
Bill Micek, Regional Sales Manager
6700 Pioneer Pkwy
Johnston, IA 50131
Phone: (972) 734-6434

Shuttleworth & Ingersoll PLC
William J. Daly, Associate Attorney
Wes Huisenga, Senior Vice President
115 3rd Street, Suite 500
Cedar Rapids, Iowa 52406
Phone: (319) 365-9461

Single Source Architects & Master Builders
James Christensen,
Director of Sales, CFO
112 W. Park Lane
Waterloo, Iowa 50701
Phone: (319) 232-6554

Spectrum Financial Services
Larry Carroll
9290 W Dodge Road, Suite 203
Omaha, Nebraska 68114
Phone: (319) 540-9955

Travelers
Patty Schutz
385 Washington Street MCSB04F
St. Paul, Minnesota 55102
Phone: (651) 310-3238

TurnKey Associates, LC
Scott A. Voigt, President
Steph Weiand, Vice President, Architect
216 E 4th Street
Waterloo, Iowa 50702
Phone: (319) 232-4242

TurnKey Security Equipment
Joe Petchulat, President and CEO
310 East Main Street, Suite 110
Manchester, Iowa 52057
Phone: (563) 927-5445

Universal Printing Services
Bruce Hoium
2828 5th Ave
Des Moines, IA 50313
Phone: (515) 244-1656

Vantage Point Solutions
Kelly Pfeifer
2211 North Minnesota Street
Mitchell, SD 57301
Phone: (605) 995-1796

Vital Financial Services
Michael Slater, President
12257 University Ave., Suite 206
Clive, Iowa 50325
Phone: (515) 306-1896

Whitfield & Eddy PLC
Marc Hollander,
Bus Development Coordinator
G. Mark Rice,
Attorney At Law
699 Walnut Street
Des Moines, IA 50309
Phone: (515) 288-6041
Fax: (515) 246-1474

Wipfli LLP
JoAnn Cotter
7601 France Avenue South, Suite 400
Edina, Minnesota 55435
Phone: (800) 486-3454

WRK Systems Inc.
Dave Ward
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Omaha, NE 68137
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Jonathan Ferebee  
800-786-1276  
Jferebee@viningsparks.com

Gray Allison  
800-786-2862  
gallison@viningsparks.com

Steve Lamb  
800-957-0452  
slamb@viningsparks.com

Jonathan Pence  
800-786-0059  
jpence@viningsparks.com

Wade Oliver  
800-786-0887  
wade.oliver@viningsparks.com