

April 3, 2012

Michael R. Clappitt  
Jessica Livingston  
Division of Corporation Finance  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, D.C. 20549-3561

Re: Idaho Mutual Trust Community Finance Co-op, LLC  
Regulation A Offering Statement on Form 1-A  
Filed October 31, 2011  
File No. 024-10311

Dear Mr. Clappitt and Ms. Livingston:

We are writing in response to your letter dated March 30, 2012. We have reviewed your letter and have attempted to make the changes and/or address the comments contained therein.

Below is a key outlining the page numbers in which you will find our responses/changes to your comments:

ITEM NO. SEEPAGE

For 1-A Amendment No. 2, filed March 20, 2012  
Part F/S, page 42

Item No. 1

- Clearly state pro forma financial statements presented are for a one year period. Pg. 42
- Disclosure in Note 10, revise the Class AAA Earnings, Equity yield, and Equity Cash Payout amounts and percentages for minimum capital raise to reflect a minimum of five percent return is paid to Class AAA shareholders before any profits are split between these shareholders and the Managers on an 80%/20% basis. Pg. 44

Michael R. Clampitt  
Jessica Livingston  
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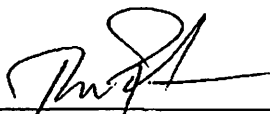

- Disclosure in Note 11, also Risk Factor disclosure, that the accumulated loan loss reserve is an arbitrary calculation.

Pgs. 16/44

Dated **this-** --day of April, 2012.

Idaho Mutual Trust Community Finance Co op, LLC, a  
Delaware limited liability company

By IMTCF, LLC, an Idaho limited liability  
company, as the Manager of Idaho Mutual Trust  
Community Finance Co-op, LLC

  
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Thomas Buuck, Manager  
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Thomas Buuck  
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Michael Hendrichs