UNITED STATES OF AMERICA
DEPARTMENT OF THE TREASURY
OFFICE OF THE COMPTROLLER OF THE CURRENCY

In the Matter of: United Texas Bank, N.A. Dallas, Texas	)))))	AA-ENF-2026-29

CONSENT ORDER

WHEREAS, effective June 12, 2026, the Office of the Comptroller of the Currency ("OCC") has supervisory authority over United Texas Bank, Dallas, Texas ("Bank");

WHEREAS, prior to June 12, 2026, the Bank was a Texas state-chartered bank, supervised by the Texas Department of Banking, and a member of the Federal Reserve System;

WHEREAS, on August 29, 2024, the Bank consented to the issuance of a cease and desist order under 12 U.S.C. § 1818 and the Texas Banking Act, as amended (Tex. Fine. Code § 31 et seq.), with the Federal Reserve Bank of Dallas and the Texas Department of Banking (the "Agencies") dated August 29, 2024 (Docket No. 24-021-B-SM, Department Order No. 2024-025) (the "2024 Order"), relating to the Agencies' findings of significant deficiencies with its foreign correspondent banking and virtual currency customers.

WHEREAS, the Bank's significant deficiencies specifically relate to its risk management and compliance with applicable laws, rules, and regulations relating to anti-money laundering ("AML"), including the Bank Secrecy Act (the "BSA") (31 U.S.C. § 5311 *et seq.)*, the rules and regulations issued thereunder by the U.S. Department of the Treasury (31 C.F.R. Chapter X), and the AML requirements of Regulation H of the Board of Governors of the Federal Reserve System (12 C.F.R. §§ 208.62 and 208.63) (collectively, the "BSA/AML Requirements"), resulting in a deficient compliance program violation;

WHEREAS, the 2024 Order required the Bank to improve the Bank's oversight and compliance with BSA/AML Requirements and the rules and regulations of the Office of Foreign Assets Control ("OFAC") (31 C.F.R. Chapter V) (the "OFAC Regulations");

WHEREAS, on November 12, 2025, the Bank filed an application to convert to a national bank with the OCC;

WHEREAS, the OCC approved the Bank's conversion application on May 15, 2026, subject to the condition that the Bank, upon consummation of the conversion to a national chartered institution, enter into a consent order incorporating corrective actions required in the 2024 Order addressing the Bank's BSA violations;

WHEREAS, the OCC and the Bank consummated the conversion of the Bank on June 12, 2026;

WHEREAS, the Bank, by and through its duly elected and acting Board of Directors ("Board"), consents to the issuance of this Order, by the OCC through the duly authorized representative of the Comptroller of the Currency ("Comptroller"); and

NOW, THEREFORE, pursuant to the authority vested in the OCC by Section 8(b) of the Federal Deposit Insurance Act, as amended, 12 U.S.C. § 1818(b), the OCC hereby orders that:

Article I

JURISDICTION

(1) The Bank is an "insured depository institution" as that term is defined in 12 U.S.C. § 1813(c)(2).

(2) The Bank is a national banking association within the meaning of 12 U.S.C. § 1813(q)(1)(A), and is chartered and examined by the OCC. *See* 12 U.S.C. § 1 *et seq.*

(3) The OCC is the "appropriate Federal banking agency" as that term is defined in 12 U.S.C. § 1813(q) and is therefore authorized to initiate and maintain this cease and desist action against the Bank pursuant to 12 U.S.C. § 1818(b).

Article II

COMPLIANCE REPORTING

(1) Within thirty (30) days after the end of each calendar quarter, the Board shall submit to the Assistant Deputy Comptroller a written progress report setting forth in detail the specific corrective actions undertaken to comply with each Article of this Order and the status of the corrective actions.

Article III

BOARD OVERSIGHT

(1) Effective as of the date of this Order, Bank management, subject to Board review and ongoing monitoring, shall continue to implement and thereafter ensure adherence to the plan approved under the 2024 Order to strengthen Board oversight of the Bank's compliance with the BSA, as amended (31 U.S.C. § 5311 *et seq.*), and the regulations promulgated thereunder, the rules and regulations of the OCC, and OFAC Regulations, and that includes the following:

(a) actions that the Board will take to maintain effective control over and oversight of Bank management's compliance with the BSA and the OFAC Regulations;

(b) measures to ensure noncompliance with the BSA and OFAC Regulations are appropriately tracked, escalated, and reviewed by the Bank's senior management;

(c) measures to ensure that those at the Bank charged with overseeing the Bank's compliance with BSA/AML Requirements and OFAC Regulations possess appropriate subject matter expertise, stature, and direct reporting access to the Board, or the relevant committee, to carry out such responsibilities; and

(d) measures to ensure the Bank has adequate resources for the BSA/AML Requirements and OFAC Regulations, including sufficient staffing levels, and the performance of periodic re-evaluations of resource and staffing needs.

(2) The Board shall review the effectiveness of the plan required by paragraph (1) of this Article at least annually, and more frequently if necessary or if required by the OCC in writing, and amend the plan as needed or directed by the OCC.

Article IV

BSA/AML COMPLIANCE PROGRAM

(1) Effective as of the date of this Order, Bank management, subject to Board review and ongoing monitoring, shall continue to implement and thereafter ensure adherence to the plan approved under the 2024 Order, for a revised BSA/AML compliance program to achieve compliance with the BSA, and that shall include the following:

(a) measures to fully address the findings and recommendations in the Agencies' report of examination that commenced on September 2, 2025;

(b) a system of internal controls reasonably designed to ensure ongoing compliance with the BSA;

(c) a comprehensive risk assessment that appropriately identifies and considers all products and services of the Bank, customer types, geographic locations, and transaction volumes, as appropriate, in determining inherent and residual risks;

(d) enhanced independent testing procedures to ensure that comprehensive reviews of the Bank's BSA/AML compliance Program are performed on a regular basis by qualified parties who are independent of the Bank's business lines and compliance function;

(e) management of the Bank's BSA/AML compliance Program by a qualified compliance officer, who is given full autonomy, independence, and responsibility for implementing and maintaining an effective BSA/AML compliance Program that is commensurate with the Bank's size and risk profile, has meaningful decision-making authority, and is supported by adequate staffing levels and resources; and

(f) enhanced policies and procedures to ensure effective training for all personnel, including targeted training for personnel with compliance-related responsibilities, in all aspects of the BSA.

(2) The Board shall review the effectiveness of the program required by paragraph (1) of this Article at least annually, and more frequently if necessary or if required by the OCC in writing, and amend the program as needed or directed by the OCC.

Article V

CUSTOMER DUE DILIGENCE

(1) Effective as of the date of this Order, Bank management, subject to Board review and ongoing monitoring, shall continue to implement and thereafter ensure adherence to the revised customer due diligence ("CDD") program approved under the 2024 Order that shall include the following:

(a) policies, procedures, and controls to ensure that the Bank collects, analyzes, and retains complete and accurate customer information for all account holders, including, but not limited to:

(i) documentation necessary to verify the identity, source of wealth, and business activities of the customer; and

(ii) documentation necessary to understand the normal and expected transactions of the customer;

(b) a plan, with intermediate timelines and milestones, to remediate deficient due diligence for existing customer accounts;

(c) a methodology for assigning risk ratings to customers that considers factors such as type of customer, type of products and services, geographic location, and transaction type and volume;

(d) a risk-focused assessment of the Bank's customer base to:

(i) identify the categories of customers whose transactions and banking activities are routine and usual;

(ii) identify the categories of customers that pose a heightened risk of conducting potentially illicit activities at or through the Bank;

(iii) determine the appropriate level of additional due diligence necessary for those categories of customers that pose a heightened risk of conducting potentially illicit activities at or through the Bank, including the level needed to identify any nested financial institution or foreign shell banking activity; and

(iv) procedures to ensure that periodic reviews and evaluations of customer and account information are conducted and documented for all account holders.

(2) The Board shall review the effectiveness of the program required by paragraph (1) of this Article at least annually, and more frequently if necessary or if required by the OCC in writing, and amend the program as needed or directed by the OCC.

Article VI

SUSPICIOUS ACTIVITY MONITORING AND REPORTING

(1) Effective as of the date of this Order, Bank management, subject to Board review and ongoing monitoring, shall continue to implement and thereafter ensure adherence to the revised program approved under the 2024 Order, to reasonably ensure the identification and timely, accurate, and complete reporting by the Bank of all known or suspected violations of law or suspicious transactions to law enforcement and supervisory authorities, as required by applicable suspicious activity reporting laws and regulations, that shall include the following:

(a) a well-documented methodology for establishing monitoring rules and processes that take into consideration the Bank's risk profile, type of customer, type of product or service, geographic location, and banking activities;

(b) policies and procedures that provide for periodic review of the monitoring rules and thresholds;

(c) enhanced monitoring and investigation criteria and procedures to ensure the timely detection, investigation, and reporting of all known or suspected violations of law and suspicious transactions, including:

  (i) effective monitoring of customer accounts and transactions;

  (ii) appropriate allocation of resources to manage alert and case inventory;

  (iii) adequate escalation of information about potentially suspicious activity through appropriate levels of management; and

  (iv) maintenance of sufficient documentation with respect to the investigation and analysis of potentially suspicious activity, including the resolution and escalation of concerns;

(d) policies, procedures, and processes for identifying subjects of law enforcement requests, monitoring the transaction activity of those subjects when appropriate, identifying unusual or potentially suspicious activity related to those subjects, and filing, as appropriate, suspicious activity reports related to those subjects;

(e) measures to ensure that alert dispositions are supported with adequate rationale and documentation; and

(f) controls to ensure that transaction monitoring systems and associated processes are subject to periodic reviews and timely updates.

(2) The Board shall review the effectiveness of the program required by paragraph (1) of this Article at least annually, and more frequently if necessary or if required by the OCC in writing, and amend the program as needed or directed by the OCC.

Article VII

OFFICE OF FOREIGN ASSETS CONTROL COMPLIANCE

(1) Effective as of the date of this Order, Bank management, subject to Board review and ongoing monitoring, shall continue to implement and thereafter ensure adherence to the plan approved under the 2024 Order to enhance the Bank's compliance with OFAC Regulations, including, but not limited to, enhanced OFAC screening procedures, an improved methodology for assessing OFAC risks, training related to compliance with OFAC Regulations appropriate to the employee's job responsibilities that is provided on an ongoing, periodic basis, and enhanced policies and procedures to ensure compliance with OFAC Regulations.

(2) The Board shall review the effectiveness of the program required by paragraph (1) of this Article at least annually, and more frequently if necessary or if required by the OCC in writing, and amend the program as needed or directed by the OCC.

Article VIII

GENERAL BOARD RESPONSIBILITIES

(1) The Board shall ensure that the Bank has timely adopted and implemented all corrective actions required by this Order, and shall verify that the Bank adheres to the corrective actions and they are effective in addressing the Bank's deficiencies that resulted in this Order. The Board shall hold Bank management and personnel accountable for executing their duties and responsibilities pertaining to or resulting from this Order.

Article IX

WAIVERS

(1) The Bank, by executing and consenting to this Order, waives:

(a) any and all rights to the issuance of a Notice of Charges pursuant to 12 U.S.C. § 1818;

(b) any and all procedural rights available in connection with the issuance of this Order;

(c) any and all rights to a hearing and a final agency decision pursuant to 12 U.S.C. § 1818 and 12 C.F.R. Part 19;

(d) any and all rights to seek any type of administrative or judicial review of this Order;

(e) any and all claims for fees, costs, or expenses against the OCC, or any of its officers, employees, or agents related in any way to this enforcement matter or this Order, whether arising under common law or under the terms of any statute, including, but not limited to, the Equal Access to Justice Act, 5 U.S.C. § 504 and 28 U.S.C. § 2412;

(f) any and all rights to assert these proceedings, the consent to and/or the issuance of this Order, as the basis for a claim of double jeopardy in any pending or future proceedings brought by the United States Department of Justice or any other governmental entity; and

(g) any and all rights to challenge or contest the validity of this Order.

Article X

CLOSING

(1) This Order is a settlement of the cease and desist proceedings against the Bank contemplated by the OCC. The OCC releases and discharges the Bank from all potential liability for a cease and desist order that has been or might have been asserted by the OCC, to the extent known to the OCC as of the effective date of this Order. The OCC expressly reserves its right to assess civil money penalties or take other enforcement actions if the OCC determines that the Bank fails to correct the violations found in the 2024 Order or that the Bank otherwise is violating or has violated this Order.

(2) Nothing in this Order shall prevent the OCC from:

(a) instituting enforcement actions other than a cease and desist order against the Bank that is based on the violations found in the 2024 Order;

(b) instituting enforcement actions against the Bank based on any other findings, including if the OCC determines that the Bank has continued, or failed to correct, the violations found in the 2024 Order or that the Bank otherwise is violating or has violated this Order;

(c) instituting enforcement actions against institution-affiliated parties (as defined by 12 U.S.C. § 1813(u)) in consideration of the violations found in the 2024 Order or any other findings; or

(d) utilizing the violations found in the 2024 Order in future enforcement actions against the Bank or its institution-affiliated parties to establish a pattern or the continuation of a pattern.

(3) Nothing in this Order is a release, discharge, compromise, settlement, dismissal, or resolution of any actions, or in any way affects any actions that may be or have been brought by any other representative of the United States or an agency thereof, including, without limitation, the United States Department of Justice.

(4) This Order is:

(a) a "cease-and-desist order issued upon consent" within the meaning of 12 U.S.C. § 1818(b);

(b) a "cease-and-desist order which has become final" within the meaning of 12 U.S.C. § 1818(e);

(c) an "order issued with the consent of the depository institution" within the meaning of 12 U.S.C. § 1818(h)(2);

(d) an "effective and outstanding . . . order" within the meaning of 12 U.S.C. § 1818(i)(1); and

(e) a "final order" within the meaning of 12 U.S.C. § 1818(i)(2) and (u).

(5) This Order is effective upon its issuance by the OCC, through the Comptroller's duly authorized representative. Except as otherwise expressly provided herein, all references to "days" in this Order shall mean calendar days and the computation of any period of time imposed by this Order shall not include the date of the act or event that commences the period of time.

(6) The provisions of this Order shall remain effective except to the extent that, and until such time as, such provisions are amended, suspended, waived, or terminated in writing by the OCC, through the Comptroller's duly authorized representative. If the Bank seeks an extension, amendment, suspension, waiver, or termination of any provision of this Order, the

Board or a Board-designee shall submit a written request to the Assistant Deputy Comptroller asking for the desired relief. Any request submitted pursuant to this paragraph shall include a statement setting forth in detail the circumstances that warrant the desired relief or prevent the Bank from complying with the relevant provision(s) of the Order, and shall be accompanied by relevant supporting documentation. The OCC's decision concerning a request submitted pursuant to this paragraph, which will be communicated to the Board in writing, is final and not subject to further review.

(7) The Bank will not be deemed to be in compliance with this Order until it has adopted, implemented, and adhered to all of the corrective actions set forth in each Article of this Order; the corrective actions are effective in addressing the Bank's deficiencies; and the OCC has verified and validated the corrective actions. An assessment of the effectiveness of the corrective actions requires sufficient passage of time for the Bank to demonstrate the sustained effectiveness of the corrective actions.

(8) This Order is not a contract binding on the United States, the United States Treasury Department, the OCC, or any officer, employee, or agent of the OCC and neither the Bank nor the OCC intends this Order to be a contract.

(9) Each citation, issuance, or guidance referenced in this Order includes any subsequent citation, issuance, or guidance that replaces, supersedes, amends, or revises the referenced cited citation, issuance, or guidance.

(10) No separate promise or inducement of any kind has been made by the OCC, or by its officers, employees, or agents, to cause or induce the Bank to consent to the issuance of this Order.

(11) All reports, plans, or programs submitted to the OCC pursuant to this Order shall be forwarded by email to Assistant Deputy Comptroller Kimberly Einspahr.

(12) The terms of this Order, including this paragraph, are not subject to amendment or modification by any extraneous expression, prior agreements, or prior arrangements between the parties, whether oral or written.

IN TESTIMONY WHEREOF, the undersigned, authorized by the Comptroller as his duly authorized representative, has hereunto set her signature on behalf of the Comptroller.

//s// Digitally Signed, Dated: 2026.06.16

Kimberly Einspahr
Assistant Deputy Comptroller
Dallas/Ft. Worth Field Office

IN TESTIMONY WHEREOF, the undersigned, as the duly elected and acting Board of Directors of United Texas Bank, N.A. have hereunto set their signatures on behalf of the Bank.

//s// Digitally Signed	6/15/2026
Jarrod Beck	Date
//s// Digitally Signed	6/15/2026
Scott Beck	Date
//s// Digitally Signed	6/15/2026
James Huggins	Date
//s// Digitally Signed	6/15/2026
Benjamin Max Green	Date
//s// Digitally Signed	6/15/2026
Steve Gundy	Date
//s// Digitally Signed	6/15/2026
Alexander Holmes	Date
//s// Digitally Signed	6/15/2026
Jordan Licht	Date
//s// Digitally Signed	6/15/2026
David O’Hara	Date
//s// Digitally Signed	6/15/2026
Michael Patterson	Date
//s// Digitally Signed	6/15/2026
Reubin Robin	Date