

APPLICATION
to the
OFFICE OF THE COMPTROLLER OF THE CURRENCY
to organize
FORIS DAX NATIONAL TRUST BANK
October 23, 2025

October 23, 2025

VIA ELECTRONIC DELIVERY

Stephen Lybarger
Senior Deputy Comptroller for Chartering, Organization and Structure
Office of the Comptroller of the Currency
400 7th Street, S.W.
Washington, DC 20219

Re: Charter Application and Confidential Treatment Request for Foris DAX National Trust Bank

Dear Mr. Lybarger:

On behalf of the organizers of Foris DAX National Trust Bank (“FDNTB”), and Foris Holdings US, Inc. (together with its related entities, “Crypto.com”) as the sponsoring organization of FDNTB, we respectfully submit an application to the Office of the Comptroller of the Currency (the “OCC”) to charter FDNTB as a *de novo* national trust bank. The application materials include a main application, a public exhibits volume, and a confidential exhibits volume.

The information contained in the confidential exhibits volume (the “Confidential Information”) includes information regarding the business strategies and plans of Crypto.com and FDNTB, and other information of a similar nature, the public disclosure of which would result in substantial competitive harm to Crypto.com and FDNTB. The Confidential Information also includes non-public personal information, the public disclosure of which would constitute unwarranted invasion of personal property. Accordingly, confidential treatment is respectfully requested with respect to the Confidential Information pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (the “FOIA”) and the OCC’s regulations implementing the FOIA, 12 C.F.R. Part 4, Subpart B. The Confidential Information may also be exempt from disclosure under other provisions of law.

We also request that, if the OCC should make a preliminary determination not to comply with the request for confidential treatment, Crypto.com and FDNTB be given notice thereof with ample time to permit them to make an appropriate submission as to why such information should be preserved in confidence. If the Confidential Information is the subject of a FOIA request or a request or demand for disclosure by any governmental agency, Congressional office or committee, or court or grand jury, we request, pursuant to the OCC’s regulations, that you notify Crypto.com and FDNTB prior to making such disclosure. We further ask that Crypto.com and FDNTB be furnished with a copy of all written materials pertaining to such request and that Crypto.com and FDNTB be given sufficient advance notice of any intended release so that Crypto.com and FDNTB may, if deemed necessary or appropriate, pursue any available remedies.

Stephen Lybarger
October 23, 2025
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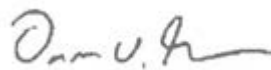
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We sincerely appreciate your time and consideration with respect to FDNTB's charter application. Should you have any questions or require any additional information, please do not hesitate to contact Josh Boehm at (212) 318-6033 or joshboehm@paulhastings.com or Dana Syracuse at (212) 318-6034 or danasyracuse@paulhastings.com.

Sincerely,



Joshua L. Boehm
for PAUL HASTINGS LLP



Dana V. Syracuse
for PAUL HASTINGS LLP

cc: Sebastian Astrada, Office of the Comptroller of the Currency
Joe Anzures, Organizer for Foris DAX National Trust Bank

FORIS DAX NATIONAL TRUST BANK

INTERAGENCY CHARTER APPLICATION

Public Volume

Volume 1

(1 of 3 Volumes)

Contact Person

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INTERAGENCY CHARTER AND FEDERAL DEPOSIT INSURANCE APPLICATION

(Check all appropriate boxes.)

Type of Charter

- ☒ National Bank
☐ State Bank
☐ Federal Savings Bank or Association
☐ State Savings Association
☐ Other

Chartering Agency

- ☒ Comptroller of the Currency
☐ State

Special Focus

- ☐ Community Development
☐ Cash Management
☒ Trust
☐ Bankers' Bank
☐ Credit Card ☐ Non-CEBA ☐ CEBA
☐ Other

Type of Insurance Application

- ☐ De Novo
☐ Operating Noninsured Institution
☐ Other

Federal Reserve Status

- ☒ Member Bank
☐ Nonmember Bank

For OCC: ☒ Standard ☐ Expedited

Proposed Depository Institution (institution)

Name Foris DAX National Trust Bank
Street 200 West Jackson Blvd. City Chicago State IL Zip 60606

Holding Company Identifying Information

Name Foris Holdings US, Inc.
Street 110 N. College Ave., Ste. 500 City Tyler State TX Zip 75702

Contact Person

Daniel Nunez Cohen Vice President, Senior Regulatory Counsel Foris DAX, Inc.	with a copy to:	Josh Boehm & Dana Syracuse, Paul Hastings LLP
Name		
110 N. College Ave., Ste. 500	200 Park Avenue	
Street		
Tyler, TX 75702	New York, NY 10166	
City, State Zip		

Email: dan.nunezcohen@crypto.com

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Foris DAX National Trust Bank

Interagency Charter Application

Foris DAX National Trust Bank Charter Application List of Exhibits

PUBLIC EXHIBIT	Vol 1
Public Notice	A
Residency Waiver Request	B

CONFIDENTIAL EXHIBITS	Vol 2
Business Plan	C
Proposed Form of Articles of Association	D
Proposed Form of Bylaws	E
Proposed Form of Stock Certificates	F
Contact Person Designation	G
Oath of Directors	H
Financial Projections	I
Sample Terms of Intercompany Agreements between FDNTB and Affiliates	J
Crypto.com – Excerpt of Organization Chart	K
Crypto.com – Ownership Chart	L
Corporate Background and Financial Report (with attachments)	M
Resumes	N

IBFR EXHIBITS	Vol 3
<i>IBFR and Related Materials</i>	

INTERAGENCY CHARTER AND FEDERAL DEPOSIT INSURANCE APPLICATION

1. Overview

- (a) Provide a brief overview of the application. The overview should describe the institution's business and any special market niche, including the products, market, services, and any nontraditional activities.

Foris Holdings US, Inc. ("FHUS"), as sponsor, acting through the named organizers, proposes to form Foris DAX National Trust Bank d/b/a/ Crypto.com National Trust Bank ("FDNTB"), a *de novo* national trust bank with its main office in Chicago, Illinois. FDNTB will limit its operations to those of a national trust bank, focusing primarily on providing custody and safekeeping of digital assets in a fiduciary capacity, as well as ancillary staking, settlement, and other customer-directed transactional services in relation to digital assets held in custody accounts, as discussed in Section III of the confidential business plan (the "Confidential Business Plan"), included as Confidential Exhibit C. FDNTB will be a wholly owned subsidiary of FHUS.

FDNTB's primary target market would be U.S.-based institutional investors, asset managers, corporate treasuries, sponsors of exchange-traded funds and exchange-traded products, proprietary traders, and potentially retail clients. FDNTB will provide clients its services through secure mobile and web-based applications that enable clients to create and access accounts readily. By providing a comprehensive set of core fiduciary services for digital asset-focused institutions and retail clients within the highly successful existing Crypto.com ecosystem, FDNTB will have significant competitive advantages, including immediate access to major clients, cost efficiencies with respect to personnel and vendors, and access to existing state-of-the-art technological and human capital infrastructure.

- (b) Describe any issues about the permissibility of the proposal with regard to applicable state or federal laws or regulations. Identify any regulatory waiver requests and provide adequate justification.

FDNTB will exercise the powers authorized for a national trust bank and activities related thereto in accordance with 12 U.S.C. § 24(Seventh) and 12 U.S.C. § 92(a). FDNTB will seek a residency waiver, the application for which is included as Public Exhibit B to this application. The residency waiver application provides the relevant information for the request.

- (c) List and provide a copy of all applications filed in conjunction with this proposal, such as applications for holding company, trust powers, branch offices, service corporations, and other subsidiaries.

The Confidential Business Plan, as set forth at Confidential Exhibit C, establishes FDNTB's request for full fiduciary powers under this application.

- (d) When available, provide a copy of all public or private offering materials and the proposed form of stock certificate, including any required restrictive legends.

No public or private offerings will be conducted. Copies of the proposed stock certificates are included with this application as Confidential Exhibit F.

- (e) Provide a copy of the proposed articles of association, articles of incorporation, or charter, and proposed bylaws.

Copies of the proposed articles of association and bylaws are included with this application as Confidential Exhibit D and Confidential Exhibit E, respectively.

- (f) Provide a copy of the business plan. The business plan should address, at a minimum, the topics contained in the appropriate regulatory agency's Business Plan Guidelines.

The Confidential Business Plan is included as Confidential Exhibit C.

2. Management

- (a) Provide a list of the organizers, proposed directors, senior executive officers, and any individual, or group of proposed shareholders acting in concert, that will own or control 10 percent or more of the institution's stock. For each person listed, attach an Interagency Biographical and Financial Report, a fingerprint card, and indicate all positions and offices currently held or to be held with the institution's holding company and its affiliates, if applicable. Include the signed "Oath of Director" for each proposed director. For an FSA filing, provide a RB 20a Certification for each person listed.

Proposed Organizers

-Joseph Anzures
-Matthew David
-James Grabow
-Rafael de Marco e Melo
-Andrew Snyder

Proposed Directors

-Joseph Anzures
-Andrew Snyder
-Patrick Brady
-Matthew David
-James Grabow

Proposed Senior Executive Officers

-Joseph Anzures (President)
-Kevin Dan (Chief Compliance Officer)
-Duncan DeVille (BSA/Sanctions Officer)
-Evan Horne (Information Security Officer)
-Andrew Snyder (Trust Officer; Treasurer)

Shareholder

-FHUS will own all shares other than the qualifying equity interests in FDNTB owned by each of the proposed directors.

Section V of the Confidential Business Plan includes additional information; *see* Confidential Exhibit C. Interagency Biographical and Financial Reports and information on all positions and offices currently held or to be held by the applicable individuals with respect to FDNTB and its affiliates are provided in the IBFR Exhibits – Volume 3. A copy of each Director’s Oath of Director is included in Confidential Exhibit H.

- (b) Describe each proposed director’s qualifications and experience to serve and oversee management’s implementation of the business plan. Describe the extent, if any, to which directors or major stockholders are or will be involved in the day-to-day management of the institution. Also list the forms of compensation, if any.

Joseph Anzures: Mr. Anzures will serve as President of FDNTB and Chairman of the Board. He is the Senior Vice President, General Manager of the Americas for Crypto.com. In that role, Mr. Anzures drives business development and relationships; negotiates contracts with many of the Crypto.com companies’ banks, payment processing partners, and merchants, and supervises a team that oversees the fiat digital wallet services to North American customers. Additionally, he is President of Foris DAX Trust Company, a non-depository trust company chartered by the New Hampshire Banking Department. In that role, he oversees strategy and business operations. Before joining Crypto.com in 2020, Mr. Anzures spent more than twenty years in the financial services industry, working for Charles Schwab, Hyperwallet, and Western Union. He has significant experience in the digital asset and payments industries, particularly retail-facing products and services.

Andrew Snyder, CPA, CAIA: Mr. Snyder will serve as the Vice Chairman of the Board and as Trust Officer and Treasurer of FDNTB. He will lead all of FDNTB’s fiduciary and finance teams on a day-to-day basis, including implementation of its policies and procedures governing the custody of fiduciary assets and capital and liquidity management. He has more than twenty years of accounting, financial statement audit, financial management, financial reporting, and custody/safekeeping experience with highly regulated financial institutions. Currently, he serves as the Head of Finance for Crypto.com’s U.S. operations. In that role, he oversees the finance department, which is responsible for managing the financial statements audit process, supervisory exams with respect to financial functions, fund reconciliation and movements, treasury management, and invoicing. Additionally, he serves as Custody Officer and a Director of Foris DAX Trust Company where he leads the firm’s custody and safekeeping operations. Before joining Crypto.com in 2022, he served as Chief Financial Officer of Nadex for nearly seven years as well as Chief Financial Officer of IG North America for over two years. Additionally, he spent over a decade, collectively, managing financial audits for an accounting firm and conducting accounting, operations, and financial reporting functions at an investment management firm. He is a certified public accountant; a Chartered Alternative Investment Analyst; and holds Series 3 and Series 34 certifications with the Natural Futures Association.

James Grabow: Mr. Grabow will serve as the Corporate Secretary. He has decades of leadership experience in the payments space and has served in senior leadership roles within Crypto.com for several years. He led Crypto.com’s North America operations for four years as President and

Director, including the operations of its North America crypto asset trading platform. In that role, he oversaw business strategy, supervisory exams by state banking regulators, and financial statement audits, and maintained key insurance, banking and payment vendor relationships. Prior to joining Crypto.com, Mr. Grabow led a prepaid card program consultancy firm and oversaw bank-issued prepaid products for Walmart for 13 years.

Matthew David: Mr. David will serve on the Board. He is Chief Corporate Affairs Officer, having previously served as Chief Marketing Officer. In that role, he oversees global corporate affairs, including strategic business relationships, communications, government relations, public policy, and philanthropy. He also served as an organizer and Board member of Foris DAX Trust Company, helping to bring the company to market. Before joining Crypto.com in 2021, he held various senior executive roles at large corporations and within the California government. He was Chief External Affairs Officer for JUUL Labs, Vice President of Global Public Affairs for Match Group, and Deputy Chief of Staff to Governor Arnold Schwarzenegger.

Patrick Brady: Mr. Brady will serve on the Board as an independent director. He has extensive senior leadership experience in the banking industry, having served as a regional president of FirstBank for 32 years. In that role, he led more than 400 employees and oversaw strategic initiatives, business development, and balance sheet management for \$6 billion in assets.

Resumes for each organizer, director, and senior officer are included as Confidential Exhibit N.

The Board will oversee the performance of FDNTB's senior executive team; set the strategic direction of FDNTB; and exercise its oversight function to ensure the safety and soundness of FDNTB's operations and controls, including through review of internal and external audits, annual and quarterly financial statements, and correspondence with the OCC and outside advisors from time-to-time. The senior executive team will be responsible for the day-to-day management of FDNTB's operations. Compensation is discussed in Sections V.A, D of the Confidential Business Plan. See Confidential Exhibit C.

FHUS and the non-director organizers will not be involved in the day-to-day management of FDNTB. FHUS and the organizers will be the only direct shareholders of FDNTB.

(c) Provide a list of board committees and members.

FDNTB will have an Audit Committee of at least three directors.

FDNTB will have a Risk Management Committee of at least three directors.

Additional details about both committees are included in Section V.B of the Confidential Business Plan. See Confidential Exhibit C.

(d) Describe any plans to provide ongoing director education or training.

FDNTB will engage external legal counsel, auditors, and advisors to provide ongoing education to the directors. The education will encompass the roles and responsibilities of the Board; the OCC's regulations and guidance manuals, including its "Directors Book: The Role of Directors

for National Banks and Federal Savings Associations”; and insights into emerging compliance, risk, and market factors. The external advisors will provide such training during the organization phase and no less than semi-annually, but may provide more frequent training at the discretion of the Board.

Directors and senior management who wish to participate in additional continuing education opportunities will be reimbursed for reasonable expenses as appropriate. Such expenses may include workshops (including those sponsored by the OCC), training sessions by trade associations and external expertise, and conferences. The Board will engage experts, legal counsel, and consultants in key issue areas to advise the Board during Board meetings from time to time.

- (e) Describe each proposed senior executive officer’s duties and responsibilities and qualifications and experience to serve in his/her position. If a person has not yet been selected for a key position, list the criteria that will be required in the selection process. Discuss the proposed terms of employment, including compensation and benefits, and attach a copy of all pertinent documents, including an employment contract or compensation arrangement. Provide the aggregate compensation of all officers.

See Section V.C of the Confidential Business Plan - Confidential Exhibit C.

- (f) Describe any potential management interlocking relationships (12 U.S.C. 1467a(h)(2), 3201-3208, or applicable state law) that could occur with the establishment or ownership of the institution. Include a discussion of the permissibility of the interlock with regard to relevant law and regulations or include a request for an exemption.

There will be no management interlocking relationships within the meaning of 12 U.S.C. 1467a(h)(2), 3201-3208 or applicable state law.

- (g) Describe any potential conflicts of interest.

The organizers are not aware of potential conflicts of interest with respect to FDNTB. FDNTB will comply with 12 C.F.R. § 9.12.

- (h) Describe any transaction, contract, professional fees, or any other type of business relationship involving the institution, the holding company, and its affiliates (if applicable), and any organizer, director, senior executive officer, shareholder owning or controlling 10 percent or more, and other insiders. Include professional services or goods with respect to organizational expenses and bank premises and fixed asset transactions. (Transactions between affiliates of the holding company that do not involve the institution need not be described).

See Section V of the Confidential Business Plan - Confidential Exhibit C.

- 1) State whether the business relationship is made in the ordinary course of business, is made on substantially the same terms as those prevailing at the time for comparable

transactions with non-insiders, and does not present more than the normal risk of such transaction or present other unfavorable features.

See Section V of the Confidential Business Plan - Confidential Exhibit C.

- 2) Specify those organizers that approved each transaction and whether the transaction was disclosed to proposed directors and prospective shareholders.

The intercompany agreements will all be approved by the Board, and the Board will be apprised of the nature of the agreements and counterparties.

- 3) Provide all relevant documentation, including contracts, independent appraisals, market valuations, and comparisons.

See Section V of the Confidential Business Plan - Confidential Exhibit C - and Confidential Exhibit K.

- (i) Describe all stock benefit plans of the institution and holding company, including stock options, stock warrants, and other similar stock-based compensation plans, for senior executive officers, organizers, directors, and other insiders.

FDNTB will not provide stock benefit plans, and FHUS does not provide such plans.

Include in the description:

- 1) The duration limits.

FDNTB will not provide stock benefit plans, and FHUS does not provide such plans.

- 2) The vesting requirements.

FDNTB will not provide stock benefit plans, and FHUS does not provide such plans.

- 3) Transferability restrictions.

FDNTB will not provide stock benefit plans, and FHUS does not provide such plans.

- 4) Exercise price requirements.

FDNTB will not provide stock benefit plans, and FHUS does not provide such plans.

- 5) Rights upon termination.

FDNTB will not provide stock benefit plans, and FHUS does not provide such plans.

6) Any “exercise of forfeiture” clause.

FDNTB will not provide stock benefit plans, and FHUS does not provide such plans.

7) Number of shares to be issued or covered by the plans.

FDNTB will not provide stock benefit plans, and FHUS does not provide such plans.

Provide a list of participants, allocation of benefits to each participant, and a copy of each proposed plan. (Plans must conform to applicable regulatory guidelines.)

FDNTB will not provide stock benefit plans, and FHUS does not provide such plans.

3. Capital

- (a) For each class of stock, provide the number of authorized shares, the number of shares to be issued, par value, voting rights, convertibility features, liquidation rights, and the projected sales price per share. Indicate the amount of net proceeds to be allocated to common stock, paid-in surplus, and other capital segregations.

FDNTB will issue common stock and preferred stock. *See* FDNTB’s proposed form of Articles of Association (Confidential Exhibit D) and proposed form of stock certificates (Confidential Exhibit F) for additional information.

- (b) Describe any noncash contributions to capital, and provide supporting documents for assigned values, including an independent evaluation or appraisal.

Not applicable. All contributions to FDNTB’s capital will be in the form of cash and cash equivalents.

- (c) Discuss the adequacy of the proposed capital structure relative to internal and external risks, planned operational and financial assumptions, including technology, branching, and projected organization and operating expenses. Present a thorough justification to support the proposed capital, including any off-balance-sheet activities contemplated. Describe any plans for the payment of dividends.

FDNTB will maintain adequate capital and liquidity based on the guidance specified in OCC Bulletin 2007-21, Supervision of National Trust Banks: Revised Guidance: Capital and Liquidity. FDNTB’s capital and liquidity will be reviewed periodically by the Board of Directors and adjusted in light of changes to FDNTB’s business model, assets under custody, risk management, growth, revenues against expenses, and strategic direction, among other factors. Additional information is contained in the Confidential Business Plan (Confidential Exhibit C).

- (d) List all known subscribers to stock. For organizers, directors, 10 percent shareholders, senior executive officers, and other insiders, include the number of shares and anticipated investment and the amount of direct and indirect borrowings to finance the investment. Discuss how any debt will be serviced.

Each proposed director will own \$1,000.00 worth of stock and FHUS will own the remainder. The purchase of shares will not be financed by debt.

- (e) List recipients and amounts of any fees, commissions, or other considerations in connection with the sale of stock.

There will be no fees, commissions or other considerations distributed in connection with the capitalization of FDNTB by its organizers and FDNTB will not otherwise sell stock.

- (f) Indicate whether the institution plans to file for S Corporation tax status.

No, FDNTB will not file for S Corporation tax status.

4. Convenience and Needs of the Community

NOTE: This information must be consistent with the proposed business plan.

(a) Market Characteristics

- 1) Define the intended geographical market area(s). Include a map of the market area, pinpointing the location of proposed bank's offices and offices of competing depository institutions.

See Sections IV.B, and C of the Confidential Business Plan - Confidential Exhibit C.

- 2) Describe the competitive factors the institution faces in the proposed market and how the institution will address the convenience and needs of that market to maintain its long-term viability.

See Section IV.D of the Confidential Business Plan - Confidential Exhibit C.

- 3) Discuss the economic environment and the need for the institution in terms of population trends, income, and industry and housing patterns.

See Sections IV.B-D of the Confidential Business Plan - Confidential Exhibit C.

(b) Community Reinvestment Act (CRA) Plan¹

NOTE: The CRA Plan must be bound separately.

- 1) Identify the assessment area(s) according to the CRA regulations.²

Not applicable as FDNTB will not be a depository institution; therefore, it will not be subject to the Community Reinvestment Act.

- 2) Summarize the performance context for the institution based on the factors discussed in the CRA regulations.³

Not applicable as FDNTB will not be a depository institution; therefore, it will not be subject to the Community Reinvestment Act.

- 3) Summarize the credit needs of the institution's proposed assessment area(s).

Not applicable as FDNTB will not be a depository institution; therefore, it will not be subject to the Community Reinvestment Act.

- 4) Identify the CRA evaluation test⁴ under which the institution proposes to be assessed.

Not applicable as FDNTB will not be a depository institution; therefore, it will not be subject to the Community Reinvestment Act.

- 5) Discuss the institution's programs, products, and activities that will help meet the existing or anticipated needs of its community(ies) under the applicable criteria of the CRA regulation, including the needs of low- and moderate-income geographies and individuals.

Not applicable as FDNTB will not be a depository institution; therefore, it will not be subject to the Community Reinvestment Act.

5. Premises and Fixed Assets

- (a) Provide a physical description for permanent premises and discuss whether they will be publicly and handicapped accessible. Indicate the level and type of property insurance to be carried.

See Section III.C of Confidential Exhibit C. Standard commercial property and general liability coverage will be maintained.

- (b) If the permanent premises are to be purchased, provide name of seller, purchase price, cost and description of necessary repairs and alterations, and annual depreciation. If the premises are to be constructed, provide the name of the seller, the cost of the land, and the construction costs. Indicate the percentage of the building that will be occupied by the bank. Provide a copy of the appraisal.

The premises will be leased.

- (c) If the permanent premises are to be leased, provide name of owner, terms of the lease, and cost and description of leasehold improvements. Provide a copy of the proposed lease when available.

A copy of the lease will be submitted to the OCC at a later date.

- (d) If temporary quarters are planned, provide a description of interim facility, length of use, lease terms, and other associated commitments and costs.

Not applicable; FDNTB will have a permanent space.

- (e) State whether proposed premises and fixed asset expenditures conform to applicable statutory limitations.

The leased office will conform to the applicable regulations.

- (f) Outline the security program that will be developed and implemented, including the security devices.⁵

See Sections VI.A, VI.A.2 of the Confidential Business Plan (Confidential Exhibit C).

- (g) Discuss any significant effect the proposal will have on the quality of the human environment. Include in the discussion changes in air and/or water quality, noise levels, energy consumption, congestion of population, solid waste disposal, or environmental integrity of private land within the meaning of the National Environmental Policy Act, 42 U.S.C. 4321, et seq.

The proposal will not have a significant effect on the quality of the human environment.

- (h) Describe any plan to establish branches or relocate the main office within the first three years. Any acquisition or operating expenses should be reflected in the financial projections.

FDNTB does not have any plans to relocate the main office within the first three years. FDNTB intends to establish its main office prior to commencing operations.

- (i) Indicate if the establishment of the proposed main office and/or any branch site may affect any district, site, building, structure, or object listed in, or eligible for listing in, the National Register of Historic Places pursuant to the National Historic Preservation Act, 16 U.S.C. 470f. (See the Advisory Council on Historic Preservation at www.achp.gov for the Act and implementing regulations.) Specify how such determination was made:

- 1) Consultation with the State Historic Preservation Officer (SHPO) and/or Tribal Historic Preservation Officer (THPO) (when tribal lands or historic properties of significance to a tribe are involved).

- 2) Reviewed National Register of Historic Places (see www.nps.gov/nr).
- 3) Applied National Register criteria to unlisted properties.⁶
- 4) Reviewed historical records.
- 5) Contact with preservation organizations.
- 6) Other (describe).

The main office is not included in the National Register of Historic Places.

As appropriate, provide a copy of any documentation of consultation with the SHPO and/or THPO. *You are reminded that if a historic property may be affected, no site preparation, demolition, alterations, construction or renovation may occur without the appropriate regulatory agency's authorization.*

6. Information Systems

- (a) State whether the institution plans to market its products and services (the ability to do transactions or account maintenance) via electronic means. If yes, specifically state the products and services that will be offered via electronic banking or the Internet.

All of FDNTB's products and services will be available electronically. The services will be available via a mobile application and website, each of which will require secure personalized account credentials.

- (b) Outline the proposed or existing information systems architecture and any proposed changes or upgrades. The information should describe how: (1) the information system will work within existing technology; (2) the information system is suitable to the type of business in which the institution will engage; (3) the security hardware, software, and procedures will be sufficient to protect the institution from unauthorized tampering or access; and (4) the organizers and directors will allocate sufficient resources to the entire technology plan.

See Sections VI.A, VI.A.2 of the Confidential Business Plan (Confidential Exhibit C).

- (c) Provide lists or descriptions of the primary systems and flowcharts of the general processes related to the products and services. The level of detail in these system descriptions should be sufficient to enable verification of the cost projections in the *pro formas*.

See Sections III, VI.A, and VI.A.2 of the Confidential Business Plan (Confidential Exhibit C).

- (d) Estimate the start-up budget for the information systems related to the products and services and the expected annual operating and maintenance costs (including telecommunications, hardware, software, and personnel).

See Sections VIII of the Confidential Business Plan (Confidential Exhibit C) and the financial projections (Confidential Exhibit I).

- (e) Describe the physical and logical components of security. Describe the security system and discuss the technologies used and key elements for the security controls, internal controls, and audit procedures. Discuss the types of independent testing⁷ the institution will conduct to ensure the integrity of the system and its controls.

See Sections III, VI.A, and VI.A.2 of the Confidential Business Plan (Confidential Exhibit C).

- (f) Describe the information security program that will be in place to comply with the “Interagency Guidelines Establishing Standards for Safeguarding Customer Information.”⁸

See Sections III, VI.A, and VI.A.2 of the Confidential Business Plan (Confidential Exhibit C).

7. Other Information

- (a) List activities and functions, including data processing, that will be outsourced to third parties, identifying the parties and noting any affiliations. Describe all terms and conditions of the vendor management activities and provide a copy of the proposed agreement when available. Describe the due diligence conducted and the planned oversight and management program of the vendors’ or service providers’ relationships (for general vendor management guidance, see the Appendix of the FFIEC’s guidance, Risk Management of Outsourced Technology Services).

See Sections III, V, VI.A, and VI.A.2 of the Confidential Business Plan (Confidential Exhibit C).

- (b) List all planned expenses related to the organization of the institution and include the name of recipient, type of professional service or goods, and amount. Describe how organization expenses will be paid.

See Section VIII of the Confidential Business Plan (Confidential Exhibit C) and the financial projections (Confidential Exhibit I).

- (c) Provide evidence that the institution will obtain sufficient fidelity coverage on its officers and employees to conform with generally accepted banking practices.

See Section VII.D of the Confidential Business Plan as set forth in Confidential Exhibit C.

- (d) If applicable, list names and addresses of all correspondent depository institutions that have been established or are planned.

See Section III of the Confidential Business Plan (Confidential Exhibit C).

- (e) Provide a copy of management's policies for loans, investments, liquidity, funds management, interest rate risk, and other relevant policies. Provide a copy of the Bank Secrecy Act program. Contact the appropriate regulatory agencies to discuss the specific timing for submission.

See Sections VII and VIII of the Confidential Business Plan (Confidential Exhibit C).

- (f) For Federal Savings Banks or Associations, include information addressing the proposed institution's compliance with qualified thrift lender requirements.

Not applicable.

- (g) If the institution is, or will be, affiliated with a company engaged in insurance activities that are subject to supervision by a state insurance regulator, provide:

- 1) The name of insurance company.

Not applicable.

- 2) A description of the insurance activity that the company is engaged in and has plans to conduct.

Not applicable.

- 3) A list of each state and the lines of business in that state in which the company holds, or will hold, an insurance license. Indicate the state where the company holds a resident license or charter, as applicable.

Not applicable.

Endnotes

¹ See applicable state requirements.

² See 12 C.F.R. 25.41, 345.41, 195.41.

³ See 12 C.F.R. 25.21(b), 345.21(b), 195.21.

⁴ See 12 C.F.R. 25.21(a), 345.21(a), 195.21.

⁵ See 12 C.F.R. 21, 326, 168.

⁶ See 36 C.F.R. 60.4.

⁷ Independent tests should cover general and environmental controls as well as audit, monitoring, and balancing controls. Independent testing will provide an objective opinion on the adequacy of these controls.

⁸ See 15 U.S.C. 6801, 6805(b); 12 C.F.R. 30; 308 and 364; 168 and 170.

OCC CERTIFICATION

We, the organizers, certify that the information contained in this application has been examined carefully and is true, correct, and complete, and is current as of the date of this submission. We also certify that any misrepresentations or omissions of material facts with respect to this application, any attachments to it, and any other documents or information provided in connection with the application for the organization of the proposed financial institution and federal deposit insurance may be grounds for denial or revocation of the charter and/or insurance, or grounds for an objection to the undersigned as proposed director(s) or officer(s) of the proposed financial institution, and may subject the undersigned to other legal sanctions, including the criminal sanctions provided for in 18 U.S.C. 1001, 1007, and 1014. We request that examiners be assigned to make any investigations necessary.

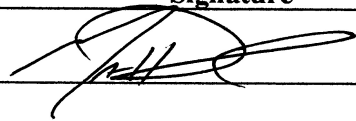
We acknowledge that approval of this application is in the discretion of the appropriate federal banking agency or agencies. Actions or communications, whether oral, written, or electronic, by an agency or its employees in connection with this filing, including approval of the application if granted, do not constitute a contract, either express or implied, or any other obligation binding upon the agency, other federal banking agencies, the United States, any other agency or entity of the United States, or any officer or employee of the United States. Such actions or communications will not affect the ability of any federal banking agency to exercise its supervisory, regulatory, or examination powers under applicable law and regulations. We further acknowledge that the foregoing may not be waived or modified by any employee or agent of a federal banking agency or of the United States.

Signature	Date	Typed Name
	10-08-25	Joseph Anzures

OCC CERTIFICATION

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Signature	Date	Typed Name
	10/1/25	Matthew David

OCC CERTIFICATION

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Signature	Date	Typed Name
	10/5/25	James Grabow

OCC CERTIFICATION

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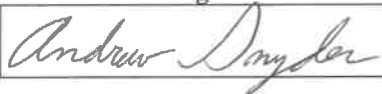
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Signature	Date	Typed Name
	October 7, 2025	Rafael De Marco E Melo

OCC CERTIFICATION

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Signature	Date	Typed Name
	10/01/2025	Andrew Snyder

Public Exhibits

Public Exhibit A

Public Notice

**An Application to Organize a National Trust Bank
Has Been Filed
with the Office of the Comptroller of the Currency**

The organizers, identified below, intending to organize and operate a national trust bank according to the provisions of the National Bank Act, as amended, submitted an application to the Office of the Comptroller of the Currency for permission to organize a national trust bank, and propose as follows:

1. That the national trust bank will have the following title: Foris DAX National Trust Bank.
2. That the main office of the national trust bank will be located at 200 West Jackson Blvd., Chicago, Illinois 60606.

The organizers and sponsoring organization of Foris DAX National Trust Bank are:

Joseph Anzures
Matthew David
James Grabow
Rafael de Marco e Melo
Andrew Snyder

Foris Holdings US, Inc., 110 N. College Ave., Ste 500, Tyler, TX 75702

Any person desiring to comment on this application may do so by submitting written comments within 30 days following the date of publication of this notice to Sebastian Astrada, Director for Licensing, 400 7th St., NW, Washington, DC 20219, or by emailing LicensingPublicComments@occ.treas.gov.

A person who wishes to view the public file should submit a request to Sebastian Astrada, Director for Licensing, 400 7th St., NW, Washington, DC 20219, or by emailing Licensing@occ.treas.gov. The public may find information regarding this application, including the date of the end of the public comment period, in the OCC Weekly Bulletin at www.occ.gov.

Public Exhibit B
Residency Waiver Request

Residency Waiver Request

Applicant

Name	Foris DAX National Trust Bank	Charter Number	TBD
Street Address	200 West Jackson Blvd.		
City	Chicago	County	Cook
		State	IL
		Zip Code	60606

Parent Company Identifying Information (if applicable):

Name	Foris Holdings US, Inc.				
Street Address	110 N. College Avenue				
City	Tyler	State	TX	Zip Code	75702

Contact Person:

Name	Daniel Nunez Cohen	Title	VP, Senior Regulatory Counsel		
Employer	Foris DAX, Inc.				
Street Address	110 N. College Avenue, Suite 500				
City	Tyler	State	TX	Zip Code	75702
Phone No.		Fax No.			
E-mail	dan.nunezcohen@crypto.com				

1. Overview

Include the following information:

~~For individual waivers:~~

- ~~• Name of individual seeking a residency waiver.~~
- ~~• The biographical portion only of the Interagency Biographical and Financial Report.~~

For multiple waivers:

If seeking multiple waivers of the residency requirement of 12 USC 72, so that a majority of the bank's directors will not be required to satisfy the residency requirement, indicate the number of board of directors who meet the residency requirements and number of directors who do not.

Four of the five identified and proposed directors (Joseph Anzures, Patrick Brady, Matthew David, and James Grabow) for the proposed Foris DAX National Trust Bank ("FDNTB") will not meet the residency requirement. One of the five identified directors (Andrew Snyder) will meet the residency requirement.

- Joseph Anzures is a resident of Colorado.

- Patrick Brady is a resident of Colorado.
- Matthew David is a resident of California.
- James Grabow is a resident of Florida.

While FDNTB will be physically located in Chicago, Illinois, each director will, through electronic means, have ready access to bank documents and management reports in order to fulfill their duties to the trust bank. Each proposed director was selected for their respective business acumen and each director's respective skills will provide for oversight of FDNTB's operations.

For all waivers:

Upon election to the board of directors and with the approval of this request, indicate the number of directors who reside in the state(s), territory, or district in which the bank has its main office or branches, or within 100 miles of the national bank's main office for at least one year immediately preceding their election, and the number of who do not.

One of the directors (Andrew Snyder) is a resident of Illinois.

Four of the directors are not residents of Illinois and will not reside within 100 miles of the national trust bank's main office for at least one year immediately preceding their election.

Include a discussion of the proposed director's specific qualifications and experience, how (*he, she, they*) will carry out (*his, her, their*) duties and responsibilities effectively to ensure that the bank is meeting its operating goals, and how this waiver will support the safety and soundness of the bank.

The organizers have concluded that the board of directors of FDNTB can provide effective oversight of the trust bank's activities without needing to be physically working at FDNTB's offices in Chicago, Illinois. As detailed in Section IV.A of the confidential business plan for FDNTB, the proposed business for FDNTB is not a physical retail operation requiring in-person supervision of its operations. Meetings of the board of directors will be held in accordance with FDNTB's bylaws, either in-person or electronically.

Each of the proposed directors was selected because he brings unique experiences that separates him from other potential candidates for directors of FDNTB. Because Mr. Anzures, Mr. David, Mr. Grabow, and Mr. Snyder currently serve in executive-level roles at Crypto.com, they are intimately familiar with Crypto.com's business, operations, and strategy. This will enhance the FDNTB board's ability to oversee FDNTB efficiently and effectively as a new regulated subsidiary within the Crypto.com family of companies.

In addition, each has served in senior policymaking, banking, financial services, and corporate strategy positions prior to joining Crypto.com, which will benefit FDNTB by ensuring it is overseen by directors with significant familiarity to operating a financial institution in a regulated environment. For example, Mr. Anzures, who will chair the board of directors of FDNTB, is the Senior Vice President, General Manager of the Americas for Crypto.com. He previously served in senior roles relating to digital product growth, sales, and account management at Charles Schwab, Hyperwallet, and Western Union Financial Services. As a proposed independent director of FDNTB, Mr. Brady brings extensive and distinguished experience in banking, particularly as serving as the Regional President of FirstBank for over 30 years. Mr. David served in various senior leadership capacities, including as Chief External Affairs Officer of JUUL Labs and Deputy Chief of Staff to former California Governor Arnold Schwarzenegger. Mr. Grabow served as Chief Executive Officer of iPrepaid for 12 years after spending nearly 20 years at Walmart, 13 of which was in a leadership position within Walmart's Card Products Group. Each of the four individuals requiring a waiver

of residency are highly qualified candidates who maintain the requisite experience to oversee the proposed business of FDNTB.

2. Other information

The applicant certifies it is aware of the citizenship and stock ownership requirements of the persons nominated to serve as directors on its board and will review their qualifications to ensure compliance with those requirements in 12 USC 72.

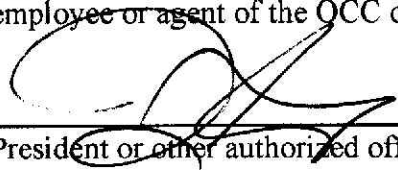
All five identified directors are citizens of the United States. Each director will have at least \$1,000 in qualifying equity interest in FDNTB.

OCC CERTIFICATION

I certify that the bank's board of directors, shareholders or a designated official has authorized the filing of this application. I certify that the information contained in this application has been examined carefully and is true, correct, complete and current as of the date of this submission. Additionally, I agree to notify the OCC if the facts described in the filing materially change prior to receiving a decision or at any time prior to consummation of the action contemplated herein.

I acknowledge that any misrepresentation or omission of a material fact with respect to this application, any attachments to it, and any other documents or information provided in connection with this application may be grounds for denial of the application or revocation of its approval, and may subject the undersigned to legal sanctions, including the criminal sanctions provided for in Title 18 of the United States Code.

I acknowledge that the approval of this application is in the discretion of the OCC. The activities and communications by OCC employees in connection with the filing, including approval of the application if granted, do not constitute a contract, express or implied, or any other obligation binding upon the OCC, the United States, any agency or entity of the United States, or any officer or employee of the United States, and do not affect the ability of the OCC to exercise its supervisory, regulatory and examination authorities under applicable law and regulations. I further acknowledge that the foregoing may not be waived or modified by any employee or agent of the OCC or the United States.



President or other authorized officer

Joseph Anzures

Typed Name

Organizer

Title

Foris DAX National Trust Bank

Employer