GIBSON DUNN

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August 4, 2026

Via CATS

Jason Almonte
Deputy Comptroller for Chartering, Organization and Structure
Office of the Comptroller of the Currency
400 7th Street, SW
Washington, D.C. 20219

Carolina Ledesma
Director for Licensing
Chartering, Organization and Structure
Office of the Comptroller of the Currency
400 7th Street, SW
Washington, D.C. 20219

Re: Texas Global Bank & Trust Company, National Association: Charter Application

Dear Mr. Almonte and Ms. Ledesma:

On behalf of the organizers of Texas Global Bank & Trust Company, National Association (the “Applicant”), a proposed de novo national trust bank, we hereby respectfully submit to the Office of the Comptroller of the Currency (the “OCC”) an Interagency Charter and Federal Deposit Insurance Application (the “Application”). The Application materials consist of the completed Application form, a volume of public exhibits to the Application, and a volume of confidential exhibits to the Application (the “Confidential Exhibits”).

CONFIDENTIAL TREATMENT REQUEST

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, and the OCC’s implementing regulations, 12 C.F.R. Part 4, Subpart B, the Applicant hereby respectfully requests that the Confidential Exhibits (the “Confidential Materials”) be treated confidentially and not be made available for public inspection or copying. The Confidential Materials have been marked “Confidential Treatment Requested.” The Confidential Materials include nonpublic commercial or financial information that is privileged or confidential within the meaning of Section 4.12(b)(4) of the OCC’s regulations or information that is otherwise exempt from public disclosure under Part 4, Subpart B of the OCC’s regulations, the disclosure of which would cause significant harm to the Applicant. The Confidential Materials also include nonpublic personal or financial information that is confidential within the meaning of Section 4.12(b)(6) of the OCC’s regulations, the disclosure of which would constitute an unwarranted invasion of personal privacy.

The Confidential Materials have not been publicly disclosed and are not required to be publicly disclosed. They have been actually and customarily kept confidential, and are being provided to the OCC under an expectation and implied assurance of privacy. Disclosure of this information would reveal to competitors the business strategies, market plans, and pro forma financial projections of the Applicant and would place the Applicant at a competitive disadvantage relative to firms that do not disclose such information. Accordingly, the Applicant believes that the Confidential Materials are privileged or confidential within the meaning of Section 4.12(b)(4) of the OCC's regulations.

The Confidential Materials also include nonpublic personal information regarding individuals that is not required to be publicly disclosed and that would constitute an unwarranted invasion of personal privacy if disclosed. For example, the information contained in the Interagency Biographical and Financial Reports falls within the definition of personally identifiable information ("PII"), the disclosure of which could cause substantial harm to those individuals. Accordingly, the Applicant believes that the Confidential Materials are also exempt from disclosure within the meaning of Section 4.12(b)(6) of the OCC's regulations, and the Applicant requests confidential treatment for the portions of the Confidential Materials that contain PII.

The Applicant further notes that, pursuant to 12 U.S.C. § 1828(x), the submission of the Confidential Materials to the OCC shall not be construed as waiving, destroying, or otherwise affecting any privilege the Applicant may claim with respect to the Confidential Materials as to any person or entity other than the OCC.

The Applicant also respectfully requests that any internal OCC records, including memoranda, notes, correspondence, or other writings made by an employee, agent, or other person under the control of the OCC, that incorporate, include, reflect, or relate to any of the Confidential Materials, likewise be maintained in confidence, not be made part of any public record, and not be disclosed to any person, to the same extent as the Confidential Materials themselves.

Finally, the Applicant requests that it be given notice before any public release of the Confidential Materials pursuant to a request under FOIA or the OCC's regulations, or a request or demand for disclosure by any governmental agency, congressional office or committee, court, or grand jury, to permit the Applicant to make an appropriate submission as to why such information should be preserved in confidence.

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We appreciate your consideration of this matter and the related materials. If you have any questions with respect to any of the matters disclosed in this letter or the materials submitted herewith, please feel free to contact me at (212) 351-6267 or jcabral@gibsondunn.com. Thank you.

Very truly yours,

//signed// Jason J. Cabral

Jason J. Cabral
Gibson, Dunn & Crutcher LLP

Attachments

APPLICATION

to the

OFFICE OF THE COMPTROLLER OF THE CURRENCY

by

the Organizers of the proposed

TEXAS GLOBAL BANK & TRUST COMPANY, NATIONAL ASSOCIATION,

a nondepository trust company,

pursuant to

12 U.S.C. §§ 21 et seq. and 92a and 12 C.F.R. §§ 5.20 and 5.26

August 4, 2026

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

For OCC: ☒ Standard ☐ Expedited

Type of Insurance Application

- ☐ De Novo
- ☐ Operating Noninsured Institution
- ☐ Other

Federal Reserve Status

- ☒ Member Bank
- ☐ Nonmember Bank

Proposed Depository Institution (institution)

Name: Texas Global Bank & Trust Company, National Association

Street: 10440 N. Central Expressway, Suite 240 City: Dallas State: TX Zip: 75231

Holding Company Identifying Information (if applicable)

Name: Dade Hollow Holdings, LLC

Street: 10440 N. Central Expressway, Suite 240 City: Dallas State: TX Zip: 75231

Contact Person

Name: Jason Cabral

Title/Employer: Partner, Gibson, Dunn & Crutcher LLP

Street: 200 Park Avenue City: New York State: NY Zip: 10166

Phone #: 212.351.6267 Fax #: E-mail Address: jcabral@gibsondunn.com

<u>TEXAS GLOBAL BANK & TRUST COMPANY, NATIONAL ASSOCIATION</u>

Exhibit List

Volume I – Public Exhibits	
<u>Exhibit</u>	**<u>Description</u>**
Public Exhibit A	Form of Newspaper Notice

Volume II – Confidential Exhibits	
<u>Exhibit</u>	**<u>Description</u>**
Confidential Exhibit A	Strategic Business Plan
Confidential Exhibit A-1	Pro Forma Financial Statements
Confidential Exhibit B	Permissibility Analysis
Confidential Exhibit C	Residency Waiver Request
Confidential Exhibit D	Proposed Articles of Association
Confidential Exhibit E	Proposed Bylaws
Confidential Exhibit F	Interagency Biographical and Financial Reports
Confidential Exhibit G	Fiduciary Committee Charter
Confidential Exhibit H	Audit Committee Charter
Confidential Exhibit I	Risk and Compliance Committee Charter
Confidential Exhibit J	Conflicts of Interest Policy
Confidential Exhibit K	Lease Agreement for Main Office
Confidential Exhibit L	Information Security Policy
Confidential Exhibit M	Third-Party Risk Management Policy
Confidential Exhibit N	Fiduciary Investment Policy
Confidential Exhibit O	Customer Due Diligence & Enhanced Due Diligence Procedure

Volume II – Confidential Exhibits	
Exhibit	**Description**
Confidential Exhibit P	Suspicious Activity Monitoring & Reporting Procedure
Confidential Exhibit Q	BSA/AML Policy
Confidential Exhibit R	Capital & Liquidity Policy
Confidential Exhibit S	Asset Liability Management Policy
Confidential Exhibit T	Investment Portfolio Management Policy
Confidential Exhibit U	Code of Business Conduct and Ethics

PRELIMINARY STATEMENT

Texas Global Bank & Trust Company, National Association (the "Trust Bank") is a proposed nondepository national trust bank designed to serve as a regulated access point to U.S. dollar financial infrastructure for small-to-medium sized international financial institutions ("SMIFIs"), providing integrated custody, fiduciary, and payment capabilities within a single regulated entity.

The organizers submit this application (the "Application") to the Office of the Comptroller of the Currency (the "OCC") and respectfully request approval to organize the Trust Bank as a national nondepository trust bank pursuant to 12 U.S.C. §§ 21 *et seq*., to conduct activities that are part of, or incidental to, the business of banking under 12 U.S.C. § 24(Seventh), and to exercise fiduciary powers under 12 U.S.C. § 92a, in accordance with 12 C.F.R. §§ 5.20 and 5.26.

The Trust Bank's business model responds to a structural gap in the global financial system. Since the Global Financial Crisis, many global banking organizations have reduced their correspondent banking relationships with smaller international financial institutions in response to rising compliance costs, regulatory expectations, and internal risk constraints. Over the same period, cross-border payment flows and international trade activity have continued to grow. This divergence between declining correspondent banking relationships and continued growth in cross-border payment volumes has produced a persistent shortage of reliable access to U.S. dollar custody, fiduciary, and payment infrastructure for regulated financial institutions across Europe, the Middle East, Africa, Latin America, the Caribbean, and Asia.

The Trust Bank's model is deliberately focused to address this structural gap. Its business is organized around three primary categories of service: (i) custody services, comprising both fiduciary and non-fiduciary custody of institutional funds and investments; (ii) investment advisory services provided in connection with client assets held in custody; and (iii) U.S. dollar payment processing, including domestic and international wire and ACH services.

The Trust Bank will be organized within a holding company structure designed to support the development of its operational platform and the conduct of regulated fiduciary, custody, and payment services within the Trust Bank itself. The Trust Bank will be a direct, wholly owned subsidiary of Texas Global, LLC ("Texas Global"), which is in turn a direct, wholly owned subsidiary of Dade Hollow Holdings, LLC ("Dade Hollow"). Dade Hollow serves as the parent holding company and source of capital for the organization. Texas Global currently operates as a separate legal entity and serves as the pre-charter development and operating platform responsible for building the operational infrastructure, technology systems, compliance framework, vendor relationships, staffing, and institutional client relationships expected to support the Trust Bank.

During the period prior to the Trust Bank's commencement of operations (the "pre-charter period"), institutional client relationships will be established through the Texas Global platform, and related non-fiduciary custody and payment activity for those clients will be facilitated through partner banking arrangements with regulated financial institutions, in accordance with the phased development approach described in the Business Plan (as defined below). If the Application is approved, the Trust Bank will, upon commencement of operations, onboard institutional client relationships developed through the Texas Global platform, subject to the Trust Bank's applicable onboarding, due diligence, and regulatory requirements, and provide fiduciary and non-fiduciary custody, fiduciary and investment advisory services, and U.S. dollar payment services to its institutional clients. For U.S. dollar payment services, the Trust Bank, acting as custodian of client funds held in its omnibus custody accounts, will direct the disposition of those funds and settle the resulting transfers through one or more regulated partner banks that provide access to U.S. payment systems.

RESPONSES TO THE 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.

The Trust Bank is a proposed nondepository national trust bank to be headquartered in Dallas, Texas and organized and supervised by the OCC. It is designed to operate as a regulated platform through which SMIFIs can reliably access U.S. dollar custody, fiduciary, and payment services within a single regulated entity. These SMIFIs operate in an environment where access to U.S. dollar financial infrastructure has become limited as a result of correspondent banks requiring higher customer revenue hurdles due to increased operating costs, as further described in the Preliminary Statement and the Business Plan.

The Trust Bank will provide three primary categories of service:

(1) Custody services — fiduciary and non-fiduciary custody of institutional funds and investments, including the safekeeping and administration of client assets held pursuant to fiduciary agreements;

(2) Investment advisory services — investment advisory services provided in connection with client assets held in custody, which the Trust Bank will conduct in a fiduciary capacity; and

(3) U.S. dollar payment services — domestic and international payment processing, including wire transfer and ACH processing. The Trust Bank will provide these payment services as custodian, directing the disposition of client funds held in its omnibus custody accounts and settling the resulting transfers through one or more regulated bank partners that provide access to U.S. payment systems. The custodied funds are client-owned, segregated custodial assets and are not deposit liabilities of the Trust Bank, consistent with its status as a nondepository national trust bank.

The Trust Bank will exercise fiduciary powers pursuant to 12 U.S.C. § 92a and will conduct its regulated fiduciary activities in accordance with 12 C.F.R. Part 9. Its non-fiduciary custody and payment services will be conducted under 12 U.S.C. § 24(Seventh) as activities that are part of, or incidental to, the business of banking.

In delivering these services, the Trust Bank is intended to operate as an integrated platform through which institutional clients can access U.S. dollar custody, fiduciary, and payment capabilities within a single regulated environment, rather than through fragmented correspondent banking relationships.

The Trust Bank will operate under a phased development approach pursuant to which Texas Global will develop the operational infrastructure, technology systems, compliance programs, and institutional client relationships during the pre-charter period. Upon commencement of operations, institutional client relationships developed through the Texas Global platform are expected to be onboarded to the Trust Bank, with associated client assets administered in fiduciary and non-fiduciary custody arrangements. The Trust Bank will operate within the holding company structure described in the Preliminary Statement and the Business Plan.

The Trust Bank's business model is fee-based. It will not engage in deposit-taking, lending, or proprietary trading activities.

For additional information please see the Trust Bank's confidential strategic business plan (the "Business Plan"), provided as Confidential Exhibit A.

(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.

The Trust Bank will operate as a nondepository national trust bank whose activities are limited to "the operations of a trust company and activities related thereto" within the meaning of 12 U.S.C. § 27(a). Within that scope, the Trust Bank will engage in fiduciary and non-fiduciary custody, investment advisory services, and institutional U.S. dollar payment services.

The Trust Bank's fiduciary activities are authorized pursuant to 12 U.S.C. § 92a and will be conducted in accordance with 12 C.F.R. Part 9. The Trust Bank's non-fiduciary activities, including custody and payment services, are authorized as part of or incidental to the business of banking under 12 U.S.C. § 24(Seventh).

As clarified by the OCC's recent amendments to 12 C.F.R. § 5.20 and the accompanying release, national trust banks are not limited to fiduciary activities but may engage in non-fiduciary activities that are part of the business of banking. The OCC reaffirmed that such activities reflect longstanding statutory authority and supervisory practice.

The Trust Bank's proposed activities are consistent with this framework. Custody and safekeeping services are among the most fundamental and longstanding activities conducted by banks and trust companies and have been recognized by the OCC as part of the business of banking. The Trust Bank's U.S. dollar payment services likewise support its custody and fiduciary relationships with institutional clients and are part of, or incidental to, the business of banking. As described in Response 1(a) and the Preliminary Statement, the Trust Bank will provide payment services as custodian by directing the disposition of client funds held in its omnibus custody accounts and settling the resulting transfers through one or more regulated bank partners, consistent with its status as a nondepository national trust bank.

The Trust Bank will be headquartered in Texas, and its proposed fiduciary activities are consistent with those permitted for Texas state trust companies under Tex. Fin. Code Ann. § 182.001(b), including acting as custodian and investment advisor. Such activities are therefore within the scope of fiduciary powers available to the Trust Bank under 12 U.S.C. § 92a.

Based on the foregoing, the organizers are not aware of any issues regarding the permissibility of the Trust Bank's proposed activities under applicable state or federal laws or regulations. A detailed analysis of the permissibility of the Trust Bank's proposed activities is provided as Confidential Exhibit B.

The Trust Bank is seeking residency waiver requests for Messrs. Young, Head and Pedreira pursuant to 12 C.F.R. § 5.43(c)(1), which provides that a national bank "may request a waiver of the residency requirement for any number of directors by filing a written application with the OCC. The OCC may grant a waiver on an individual basis or for any number of director positions." Please see the Residency Waiver Request provided as Confidential Exhibit C for additional information.

(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.

As part of this Application, the Trust Bank is requesting approval to exercise full fiduciary powers pursuant to 12 U.S.C. § 92a and 12 C.F.R. Part 9. The Trust Bank is not required to submit a separate application for fiduciary powers pursuant to 12 C.F.R. § 5.20 and the request for fiduciary powers is included in this Application and supported by the Business Plan, provided as Confidential Exhibit A.

No additional applications for branch offices, subsidiaries, or other authorities are being submitted at this time.

(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.

Not applicable. No public or private offering materials are contemplated. The Trust Bank will be capitalized through equity contributions from Dade Hollow and it will not issue shares to third-party investors at formation.

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

A copy of the proposed Articles of Association of the Trust Bank is provided as Confidential Exhibit D. A copy of the proposed bylaws of the Trust Bank is provided as Confidential Exhibit E.

(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.

A copy of the Trust Bank's Business Plan, which addresses the OCC's Business Plan Guidelines, is provided as Confidential Exhibit A.

2. Board and Management

(a) Provide a list of organizers, proposed directors, senior executive officers, and any individual, or group of proposed shareholders acting in concert, that will own or control 10% 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.

The organizers of the Trust Bank are:

- Lisa Genecov
- Paul Young
- John McWilliams
- Michael Rokos
- Jon Ross

The proposed Board of Directors of the Trust Bank (the "Board") will consist of five members, four of whom are independent non-executive directors, representing 80% independent board composition. The proposed directors of the Trust Bank are:

Board of Directors (5 members, 80% independent)		
Name	**Position**	**Independence**
Paul Young	Chairman of the Board	Executive Director
David Head	Director	Independent, Non-Executive
Travis Goodman	Director	Independent, Non-Executive
Jorge Pedreira	Director	Independent, Non-Executive
Marc Stanley	Director	Independent, Non-Executive

The proposed senior executive officers of the Trust Bank are:

Executive Officer	**Title**
John McWilliams	Chief Executive Officer
Paul Young	Chairman & President
Michael Rokos	Chief Risk Officer & Chief Compliance Officer
Jon Ross	Chief Legal Officer

[Recruitment in Process]	Chief Trust Officer

Interagency Biographical and Financial Reports for each of the above-named individuals are provided as Confidential Exhibit F. The proposed directors will sign the Oath of Director at the first board meeting of the Trust Bank.

The organizers are actively recruiting a Chief Trust Officer candidate with dedicated bank and/or trust company fiduciary experience; a description of the role's duties and responsibilities is provided in the Business Plan, and an Interagency Biographical and Financial Report will be submitted for the selected candidate.

The Trust Bank will be a direct, wholly owned subsidiary of Texas Global, and no individual or group of individuals acting in concert will directly own or control 10% or more of the Trust Bank's stock.

(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.

The Trust Bank's Board has been structured to provide independent oversight, relevant industry expertise, and effective governance of a national trust bank engaged in cross-border custody, fiduciary, and payment services.

The Board will consist of five members, four of whom are independent non-executive directors. This composition is intended to ensure strong independent oversight while maintaining appropriate executive insight into the Trust Bank's strategy and operations.

The proposed directors collectively bring substantial experience in:

- international banking and financial institutions advisory;
- cross-border payments and capital markets;
- regulatory compliance and governance;
- fiduciary, custody, and investment management activities; and
- risk management and operational oversight.

This combination of experience is designed to ensure that the Board is capable of overseeing management's implementation of the Trust Bank's business plan, including its fiduciary responsibilities, compliance obligations, and operational risk profile.

Directors will not be involved in the day-to-day management of the Trust Bank. Day-to-day operations will be conducted by executive management, subject to oversight by the Board and its committees.

Additional information regarding the qualifications and experience of each proposed director of the Trust Bank is provided in the Interagency Biographical and Financial Reports, provided as Confidential Exhibit F. Additional detail on the roles, responsibilities and other aspects of the proposed Board is included in Section V.A of the Business Plan, provided as Confidential Exhibit A.

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

The Board will establish three committees operating under written charters approved by the Board and will report regularly to the full Board.[1]

- **Fiduciary Committee**
  - The Fiduciary Committee will oversee the Trust Bank's fiduciary activities and ensure compliance with fiduciary standards established under 12 U.S.C. § 92a and 12 C.F.R. Part 9. The Fiduciary Committee will review the opening and closing of fiduciary accounts, monitor fiduciary risk exposures, review potential conflicts of interest and review, oversee, and enforce adherence to the Trust Bank's Conflicts of Interest Policy,[2] and review the results of fiduciary audits and regulatory examinations. The Fiduciary Committee will report regularly to the Board regarding fiduciary operations and compliance with fiduciary standards.
- **Audit Committee**
  - The Audit Committee will oversee the Trust Bank's internal and external audit functions, including the audit of fiduciary activities. Responsibilities include engaging internal and external independent auditors, reviewing audit results, monitoring remediation of audit findings, and evaluating the effectiveness of the Trust Bank's internal control systems. The Audit Committee will be chaired by an independent director and will meet periodically throughout the year. The Audit Committee will report its findings to the Board.
- **Risk and Compliance Committee**
  - The Risk and Compliance Committee will oversee the Trust Bank's enterprise risk management and regulatory compliance framework. Responsibilities include reviewing the effectiveness of the BSA/AML program, monitoring sanctions and financial crime risks, overseeing cybersecurity and information security matters, and reviewing reports from the Chief Risk Officer & Chief Compliance Officer and Internal Auditor.

Additional information on the Board committees, including their composition and responsibilities, is included in the Business Plan, provided as Confidential Exhibit A.

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[1] Copies of the charters of the Fiduciary Committee, Audit Committee, and Risk and Compliance Committee are attached hereto as Confidential Exhibits G, H, and I, respectively.

[2] A copy of the Trust Bank's Conflicts of Interest Policy is attached to the Application as Confidential Exhibit J.

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

The Trust Bank will implement a structured director education and training program designed to ensure that directors maintain the knowledge and expertise necessary to oversee a national trust bank. Directors will participate in a structured orientation and continuing education program addressing the Trust Bank's business model, legal and regulatory framework governing national banks, fiduciary duties under 12 C.F.R. Part 9, the Trust Bank's risk management and compliance framework, and governance responsibilities.

Training will include:

- regulatory framework governing national banks and fiduciary activities;
- fiduciary obligations under 12 C.F.R. Part 9;
- risk management and compliance oversight;
- cybersecurity and operational risk considerations; and
- governance responsibilities and board effectiveness.

Directors will receive orientation upon appointment and periodic continuing education thereafter. Additional training will be provided as needed based on regulatory developments or changes in the Trust Bank's activities. Directors also will be encouraged to join or otherwise participate in industry organizations and training groups.

(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.

The Trust Bank's management team brings more than 130 years of collective financial services and banking experience across international banking, financial institutions investment banking, treasury operations, investment management, regulatory compliance, payments infrastructure, and financial technology. The organizers believe that the Trust Bank's leadership team's combination of global financial services experience, regulatory expertise, and operational knowledge positions the Trust Bank to operate safely and soundly while addressing the needs of an underserved segment of the global banking market.

The following table summarizes the primary areas of responsibility for each member of the Trust Bank's executive management team.

Individual and Role	Primary Responsibilities
John McWilliams, Chief Executive Officer	The Chief Executive Officer will oversee the overall management of the Trust Bank and report directly to the Board. Responsibilities also include overall leadership of the Trust Bank, execution of business

Individual and Role	Primary Responsibilities
	strategy, oversight of operations, regulatory engagement, and supervision of senior management.
Paul Young, Chairman & President	The Chairman & President will support the overall management and strategic direction of the Trust Bank and report to the Board. Responsibilities include strategic planning, oversight of institutional client relationships, business development, and support of regulatory engagement and capital markets strategy.
Michael Rokos, Chief Risk Officer & Chief Compliance Officer	The Chief Risk Officer & Chief Compliance Officer will oversee the Trust Bank's enterprise risk management framework and regulatory compliance functions. Responsibilities include BSA/AML compliance, sanctions monitoring, regulatory reporting, financial crime risk management, and oversight of the Trust Bank's compliance program. This role will maintain direct reporting access to the Board's Risk and Compliance Committee.
Jon Ross, Chief Legal Officer	The Chief Legal Officer will oversee legal matters relating to the Trust Bank's business and operations, including custody, fiduciary, and payment activities. Responsibilities include legal oversight, governance matters, review of custody and fiduciary agreements, and support of regulatory compliance and governance matters.
Chief Trust Officer [Recruitment in Process]	The Chief Trust Officer will serve as the Trust Bank's fiduciary officer within the meaning of 12 C.F.R. § 9.2(f), with responsibility for the direction and administration of the Trust Bank's fiduciary activities under 12 U.S.C. § 92a and 12 C.F.R. Part 9.
Edward Franco, Chief Technology Officer	The Chief Technology Officer will oversee the Trust Bank's technology infrastructure and information security framework. Responsibilities include systems architecture, cybersecurity oversight, vendor management, and support of technology systems used for payment processing, custody administration, and regulatory compliance.
Anish Patel, Director of Operations	The Director of Operations will oversee the Trust Bank's daily operational and treasury functions and report to the Chief Executive Officer.

Descriptions of each officer's duties and responsibilities are included in the Business Plan, provided as Confidential Exhibit A. Additional information regarding the qualifications and experience of each proposed senior executive officer of the Trust Bank is provided in the Interagency Biographical and Financial Reports provided as Confidential Exhibit F.

(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.

The organizers are not aware of any management interlocking relationships that would arise from the establishment of the Trust Bank under 12 U.S.C. §§ 1467a(h)(2), 3201-3208, or applicable state law.

(g) Describe any potential conflicts of interest.

No material conflicts of interest have been identified in connection with the establishment or operation of the Trust Bank. The Trust Bank will adopt policies and procedures designed to identify, monitor, and manage potential conflicts of interest consistent with applicable regulatory requirements.

(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% 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).

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.**

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

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

The Trust Bank does not anticipate engaging in material ongoing revenue-generating transactions with affiliated entities. Transactions between the Trust Bank and its affiliates will be limited and primarily relate to capital support and transitional operational arrangements associated with the development of the Texas Global platform. Such transactions may include:

- capital contributions from Dade Hollow to support the Trust Bank's capitalization and ongoing regulatory capital requirements;

- the contribution, transfer or assignment of certain assets, contracts, and operational infrastructure associated with the Texas Global platform at or prior to the Trust Bank's commencement of operations; and

- administrative or operational support services provided by Texas Global to the Trust Bank, which may include technology infrastructure support, vendor coordination, and certain administrative functions.

Any support services would be provided pursuant to written intercompany service agreements that establish clearly defined services, pricing, and oversight responsibilities. All affiliate transactions (if any) will be governed by formal written intercompany service agreements approved by the Trust Bank's Board to ensure that they are consistent with safe and sound banking practices and regulatory expectations governing transactions between affiliated entities.

(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. Include in the description:

1) The duration limits.

2) The vesting requirements.

3) Transferability restrictions.

4) Exercise price requirements.

5) Rights upon termination.

6) Any "exercise or forfeiture" clause.

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

Provide a list of participants, allocation of benefits to each participant and a copy of each proposed plan.

The Trust Bank will not implement stock benefit plans or similar stock-based compensation arrangements at the Trust Bank level. Equity-based compensation, if any, would be provided at the holding company level.

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.

The Trust Bank will be organized as a national banking association with a single class of common stock. The Trust Bank will be a direct, wholly owned subsidiary of Texas Global, which is in turn a direct, wholly owned subsidiary of Dade Hollow. The Trust Bank will not conduct a public or private offering of shares. All capital will be contributed in cash by Dade Hollow.

The Trust Bank will have 1,000,000 authorized shares of common stock, par value $0.01 per share, of which 1,000,000 shares will be issued to and held by the Trust Bank's immediate parent company, Texas Global. The common stock will carry standard voting rights of one vote per share. No preferred stock, convertible instruments, or other classes or features of capital stock are contemplated at formation.

Capital contributions will be allocated between common stock and additional paid-in capital consistent with regulatory capital treatment and accounting requirements.

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

The Trust Bank will not receive any noncash contributions to capital. All capital contributions will be made in cash by the Trust Bank's parent company.

(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.

The Trust Bank will maintain capital in excess of applicable minimum capital requirements under the National Bank Act and OCC regulations. An analysis of the Trust Bank's capital and liquidity needs under OCC Bulletin 2007-21, *Supervision of National Trust Banks: Revised Guidance – Capital and Liquidity* (June 26, 2007), together with the Trust Bank's approach to dividends during the de novo period, is provided in the Business Plan, provided as Confidential Exhibit A.

Management believes that the level of initial capitalization described in the Business Plan provided as Confidential Exhibit A is appropriate and conservative in light of the Trust Bank's proposed business model, which consists of fiduciary and non-fiduciary custody, investment advisory, and payment services, and does not involve lending, deposit-taking, or proprietary trading.

The Trust Bank's capital requirements are therefore driven primarily by operational, compliance, and strategic risks rather than credit or balance sheet risk. The proposed capital structure is designed to support initial operations, absorb potential variability during the early growth phase, and ensure that the Trust Bank maintains capital levels consistent with OCC expectations for a newly chartered national trust bank.

The Trust Bank's capital planning and monitoring processes will be subject to oversight by the Board and will be reviewed periodically to ensure continued alignment with the Trust Bank's risk profile, growth trajectory, and regulatory expectations.

The Trust Bank does not intend to pay dividends during its initial de novo period. Any future dividends will be subject to applicable regulatory limitations and to the maintenance of capital levels consistent with the Trust Bank's risk profile and OCC expectations, including the capital and liquidity framework described in the Business Plan.

(d) List all known subscribers to stock. For organizers, directors, 10% 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.

The Trust Bank will be a direct, wholly owned subsidiary of Texas Global and no other persons or entities will subscribe for or hold shares of the Trust Bank. Accordingly, no individual or group of individuals will directly own or control 10% or more of the Trust Bank's stock.

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

Not applicable. No fees, commissions, or other consideration will be paid in connection with the issuance of the Trust Bank's capital stock.

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

The Trust Bank does not intend to elect S corporation status.

4. Convenience and Needs of the Community

(a) Market Characteristics

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

The Trust Bank's target market is nationwide and international and consists of SMIFIs with total assets generally ranging between approximately $500 million and $50 billion. These institutions are located primarily in Europe, the Middle East, Africa, Latin America, the Caribbean, and Asia and provide banking and financial services to businesses engaged in international trade and cross-border financial activity.

Because the Trust Bank's activities are institutional in nature and are conducted through custody, fiduciary, and payment capabilities rather than a retail branch network, its market is not defined by a traditional local geographic assessment area. Instead, the Trust Bank is designed to serve a global client base of regulated financial institutions by providing a regulated institutional platform through which such institutions can obtain reliable access to U.S. dollar custody, fiduciary, and payment capabilities within the U.S. financial system.

Management estimates that more than 1,000 SMIFIs worldwide fall within the Trust Bank's target market segment.

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.

The Trust Bank is designed to address a structural gap in the global financial system that has emerged over the past decade. Global banking organizations have reduced correspondent banking relationships with smaller international financial institutions due to increased regulatory expectations, compliance costs, and internal risk management constraints. As a result, many SMIFIs have experienced reduced access to U.S. dollar custody, fiduciary, and payment services despite continued growth in cross-border trade and payment activity. This trend has created a persistent need for reliable access to U.S. dollar financial infrastructure among SMIFIs operating in global markets.

The Trust Bank is designed to function as a regulated access point to U.S. dollar financial infrastructure for these institutions. By combining fiduciary authority, institutional custody capabilities, and payment processing services within a single regulated entity, the Trust Bank provides an alternative to fragmented correspondent banking arrangements that may involve multiple intermediaries. Unlike traditional providers, the Trust Bank's platform is specifically designed to serve SMIFIs and to support cross-border financial activity within a regulatory framework consistent with U.S. supervisory expectations.

The Trust Bank will address the convenience and needs of its target market by:

- providing reliable access to U.S. dollar custody, fiduciary, and payment capabilities;
- offering integrated custody, fiduciary, and payment capabilities within a single platform;
- maintaining a compliance framework designed specifically for international financial institutions; and
- delivering operational transparency and reporting appropriate for institutional clients.

Management believes that the Trust Bank's focused business model, technology-enabled platform, and regulatory framework position it to meet a clearly defined and underserved need in the global financial system. A detailed competitive analysis, including the Trust Bank's expected competitive position, is provided in the Business Plan provided as Confidential Exhibit A.

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

The economic environment relevant to the Trust Bank is characterized by continued growth in global trade and cross-border payment activity.

Although the number of correspondent banking relationships has declined over the past decade, the volume and value of international payment flows have continued to increase. This divergence reflects the continued expansion of global commerce and the ongoing reliance on the U.S. dollar as the dominant currency for international trade and financial settlement. These trends support sustained demand for institutions capable of providing reliable access to U.S. dollar custody and financial infrastructure for SMIFIs.

Because the Trust Bank's business model is focused on fiduciary and non-fiduciary custody, investment advisory services, and institutional U.S. dollar payment services rather than lending activities, its performance is more closely linked to cross-border payment activity and global trade flows than to traditional credit cycle dynamics. A discussion of the economic characteristics of the Trust Bank's target market is provided in the Business Plan provided as Confidential Exhibit A.

(b) Community Reinvestment Act ("CRA") Plan

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

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

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

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

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 an uninsured national trust bank, the Trust Bank is not subject to the Community Reinvestment Act pursuant to 12 U.S.C. § 2902(2) and 12 C.F.R. § 25.11(c)(3).

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.

The Trust Bank's main office will be located at 10440 N. Central Expressway, Suite 240, Dallas, Texas 75231. This facility will serve as the Trust Bank's administrative headquarters and operational center. The premises consist of standard commercial office space designed to support executive management, operations, compliance, and technology functions, and provide sufficient capacity for the Trust Bank's initial staffing levels and anticipated operational needs.

The office is not publicly accessible; access is restricted to authorized personnel and is subject to the Trust Bank's security and identification protocols. The building is handicapped accessible and meets all applicable regulatory standards for accessibility. Please see Section III(F) of the Business Plan provided as Confidential Exhibit A for details regarding the main office location.

The Trust Bank will maintain property and fidelity insurance coverage at levels sufficient to conform with generally accepted banking practices and the Trust Bank's risk profile.

(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.

Not applicable. The Trust Bank does not intend to purchase or construct permanent premises.

(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.

Please see Confidential Exhibit K for a copy of the lease agreement.

(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. No temporary premises are planned.

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

Yes, the proposed premises and fixed asset expenditures conform to all applicable statutory limitations, including 12 U.S.C. § 371d. The Trust Bank's expenditures for premises and fixed assets will not exceed the amount of its capital stock.

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

The Trust Bank will implement a comprehensive security program addressing both physical and information security risks. Physical security measures will include restricted, secured entry to the office suite, visitor identification and management procedures, and controlled access to sensitive areas. Information security measures will include multi-factor authentication, role-based access controls, encryption of data in transit and at rest, and monitoring for unauthorized access. The Trust Bank will maintain incident response procedures and a Business Continuity Plan. For additional information please refer to Section VI.A of the Business Plan provided as Confidential Exhibit A.

(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.

Not applicable. The proposal will not have any significant effect on the quality of the human environment. The Trust Bank will operate from existing commercial office space and will not engage in any activities that would materially affect air or water quality, noise levels, energy consumption, population congestion, solid waste disposal, or environmental integrity.

(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.

The Trust Bank does not plan to establish branch offices during the first three years of operation. The Trust Bank's activities are conducted through institutional relationships and its technology-enabled operational platform rather than through a retail branch network.

The Trust Bank does not currently anticipate relocating its main office within the first three years.

(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.

4) Reviewed historical records.

5) Contact with preservation organizations.

6) Other (describe).

As appropriate, provide a copy of any documentation of consultation with the SHPO and/or THPO.

Not applicable. The organizers do not expect the Trust Bank's utilization of its office space will differ from current usage or have any effect on a district, site, building, structure, or object listed in, or eligible for listing in, the National Register of Historic Places. The National Register of Historic Places does not include the commercial office building at 10440 N. Central Expressway, Dallas, Texas 75231 within a National Historic District.

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 core services will be accessed by institutional clients through secure electronic means, including the Trust Bank's institutional client portal, encrypted communication channels, and secure file transfer protocols. The Trust Bank will not operate consumer-facing internet banking or mobile banking applications. Its electronic delivery model is designed specifically for institutional clients and supports high-value, cross-border financial transactions. For additional information please refer to Sections III, V, and VI.A of the Business Plan provided as Confidential Exhibit A.

(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.

The Trust Bank's information systems architecture is designed to support the integrated platform through which institutional clients can access U.S. dollar custody, fiduciary, and payment capabilities and related services, including compliance monitoring and financial reporting. The primary systems include third-party systems for trust accounting and client statements; payment processing and OFAC screening; KYC/onboarding and AML transaction monitoring; secure file transfer; and accounting and financial reporting. These systems are designed to work together through established data interfaces and are suitable for the Trust Bank's institutional business model. Security procedures include encryption, multi-factor authentication, role-based access controls, and regular penetration testing. The Board will allocate sufficient resources to ensure ongoing investment in technology infrastructure. Additional details are provided in the Business Plan provided as Confidential Exhibit A.

(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.

A description of the primary systems and flowcharts of general processes is included in the Business Plan, attached hereto as Confidential Exhibit A. As described in Section VI.A of the Business Plan, the systems architecture diagram illustrates the data flows among the Trust Bank's trust accounting, financial reporting, compliance and transaction-monitoring, and secure file-transfer systems. The technology and systems assumptions underlying these systems are reflected in the cost projections set forth in Section X of the Business Plan.

(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).

The Trust Bank has budgeted for information systems start-up costs as part of its overall organizational expenses, which are reflected in the pro forma financial statements included as Confidential Exhibit A-1. Expected annual operating and maintenance costs, including telecommunications, hardware, software, and personnel, are included in the Trust Bank's operating expense projections described in Section X (Financial Projections) of the Business Plan provided as Confidential Exhibit A. The Trust Bank will leverage cloud-based infrastructure and established vendor relationships to manage technology costs efficiently while maintaining appropriate scalability.

(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 testing the institution will conduct to ensure the integrity of the system and its controls.

Physical security controls include secured access to the Trust Bank's office premises, visitor management procedures, and restricted access to sensitive areas. Logical security controls include multi-factor authentication, role-based access controls, encryption of data at rest and in transit, and monitoring for unauthorized access. The Trust Bank's information security and internal control framework, and the independent testing of those controls, are described in Sections VI.A and VI.B of the Business Plan, attached hereto as Confidential Exhibit A.

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

The Trust Bank will maintain an information security program designed to safeguard the confidentiality, integrity, and security of customer information in accordance with applicable interagency guidelines. The program will be approved by senior management and the Board of Directors and will be reviewed at least annually to reflect changes in the Trust Bank's operations and systems and in the threats or risks to customer information. Additional detail regarding the Trust Bank's information security program is included in Section VI.A of the Business Plan, provided as Confidential Exhibit A, and in the Trust Bank's Information Security Policy, provided as Confidential Exhibit L.

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).

The Trust Bank will perform its core fiduciary, compliance oversight, and risk management functions in-house, and will outsource certain support functions to specialized third-party service providers, including information technology and cybersecurity support, payroll and benefits administration, certain financial reporting functions, and secure file transmission services. The Trust Bank will oversee these relationships through its third-party risk management program, which provides for due diligence prior to engagement and ongoing monitoring of provider performance. A description of the functions to be outsourced and the Trust Bank's vendor oversight program is included in Section VI.E of the Business Plan, provided as Confidential Exhibit A, and in the Trust Bank's Third-Party Risk Management Policy, provided as Confidential Exhibit M.

(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.

All organizational and pre-opening expenses of the Trust Bank will be funded by its ultimate parent holding company, Dade Hollow. Organizational expenses include:

- legal and regulatory advisory services;
- application preparation and licensing costs;
- technology system implementation and integration;
- recruitment and compensation of pre-opening personnel;
- consulting and compliance program development;
- vendor onboarding and due diligence; and
- office setup and administrative costs.

These expenses are reflected in the financial projections provided as Confidential Exhibit A-1 and have been incorporated into the Trust Bank's capital planning. For further information on the planned expenses and payment thereof, please see Section X (Financial Projections) of the Business Plan attached hereto as Confidential Exhibit A.

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

The Trust Bank will obtain and maintain sufficient fidelity bond coverage on its officers and employees to conform with generally accepted banking practices. Evidence of such coverage will be provided under separate cover.

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

The Trust Bank expects to establish correspondent banking relationships for payment clearing and settlement. The names and addresses of all such correspondent depository institutions will be provided under separate cover.

(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.

The Trust Bank will adopt and maintain a comprehensive set of policies and procedures governing its fiduciary activities, risk management, compliance framework, and operational controls. These policies are described throughout the Business Plan and Application and will be approved by the Board prior to commencement of operations and are included as Confidential Exhibits to the Application. Because the Trust Bank will not engage in lending, it will not maintain a loan policy.

(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 the insurance company.

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

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. The Trust Bank will not be affiliated with any company engaged in insurance activities.

REQUEST FOR FIDUCIARY POWERS

Approval is requested for the Trust Bank to exercise all fiduciary powers permitted to a national trust bank under 12 U.S.C. § 92a and 12 C.F.R. Part 9. The Trust Bank's capital and surplus will be sufficient to satisfy all applicable requirements imposed by federal law on national banks, trust banks and other entities exercising comparable fiduciary powers. Sufficient biographical information on proposed trust management personnel has been provided in connection with this Application. The fiduciary powers that the Trust Bank intends to exercise are not in contravention of applicable laws and will be conducted at its main office in Texas.

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.

Name (*Print Name*)	**Signature**	**Date**
Lisa Genecov		8/4/2026
Paul Young		
John McWilliams		
Michael Rokos		
Jon Ross		8/4/2026

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Paul Young	Paul Young	8/4/2026
John McWilliams		
Michael Rokos		
Jon Ross		

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Lisa Genecov		
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Name (*Print Name*)	**Signature**	**Date**
Lisa Genecov		
Paul Young		
John McWilliams		
Michael Rokos	Michael E. Rokos	8/4/2026
Jon Ross		

<u>Public Exhibit A</u>

Form of Newspaper 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 on August 4, 2026, for permission to organize a national trust bank, and propose as follows:

1. That the main office of the national trust bank will be located at 10440 N. Central Expressway, Suite 240, in the city of Dallas, Texas.

2. That the national bank will have the following title: Texas Global Bank & Trust Company, National Association.

The organizers are:

1. Lisa Genecov – Dallas, Texas
2. Paul Young – New York, New York
3. John McWilliams – Dallas, Texas
4. Michael Rokos – Heath, Texas
5. Jon Ross – Dallas, Texas

Dade Hollow Holdings, LLC, 10440 N. Central Expressway, Suite 240, Dallas, Texas
Texas Global, LLC, 10440 N. Central Expressway, Suite 240, Dallas, Texas

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 the Director for Licensing – Midsize, Trust, Credit Card, and Novel Banks, 400 7th St. SW, Washington, DC 20219, or by emailing LicensingPublicComments@occ.treas.gov. A person who wishes to view the public file should submit a request to the Director for Licensing – Midsize, Trust, Credit Card, and Novel Banks at the address above or by emailing Licensing@occ.treas.gov.