

**OFFICIAL ORDER OF
THE BANKING COMMISSIONER
ORDER NO. 2012-045**

IN RE: CHARTER APPLICATION FOR	§	BEFORE THE BANKING
	§	
TURTLE CREEK TRUST COMPANY, LTA	§	COMMISSIONER OF TEXAS
	§	
DALLAS, TEXAS	§	AUSTIN, TRAVIS COUNTY, TEXAS

ORDER APPROVING CONVERSION

By application accepted for filing on December 3, 2012, Turtle Creek Trust Company, Dallas, Texas, requested approval to convert to Turtle Creek Trust Company, LTA, Dallas, Texas, a State limited trust association.

Based upon investigation and examination, I find that:

1. The trust institution has properly published notice of conversion as required by 7 TAC § 21.5. No comments or protests were received in response to the publication;
2. The trust institution is not engaging in a pattern or practice of unsafe and unsound fiduciary or banking practices;
3. The trust institution has adequate capitalization for a state trust company to act as a fiduciary at the same locations as the trust institution is acting as a fiduciary before the conversion;
4. The trust institution can be expected to operate profitably after the conversion;
5. The officers and directors of the trust institution as a group have sufficient fiduciary experience, competence, trustworthiness, and integrity to justify a belief that the trust institution will operate as a state trust company in compliance with the law; and
6. Each principal shareholder has sufficient experience, ability, standing, competence, trustworthiness, and integrity to justify a belief that the trust institution will be free from

improper or unlawful influence with respect to the trust institution's operation in compliance with the law; and

Consequently, I find that the conversion of Turtle Creek Trust Company, Dallas, Texas, into Turtle Creek Trust Company, LTA, Dallas, Texas, a State limited trust association, meets the requirements set forth in TEX. FIN. CODE § 182.502.

IT IS THEREFORE ORDERED that the application of Turtle Creek Trust Company, Dallas, Texas, to convert into Turtle Creek Trust Company, LTA, a State limited trust association with no change in location, under Charter Number 1041-30, be and hereby is **APPROVED**.

Signed in triplicate original this 19th day of December, 2012.

/s/ Charles G. Cooper
Charles G. Cooper
Commissioner, Department of Banking