

**OFFICIAL ORDER OF  
THE BANKING COMMISSIONER  
ORDER NO. 2013-002**

<b>IN RE: CHARTER APPLICATION FOR</b>	<b>§</b>	<b>BEFORE THE BANKING</b>
	<b>§</b>	
<b>THE TRUST COMPANY</b>	<b>§</b>	<b>COMMISSIONER OF TEXAS</b>
	<b>§</b>	
<b>SAN ANTONIO, TEXAS</b>	<b>§</b>	<b>AUSTIN, TRAVIS COUNTY, TEXAS</b>

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**ORDER APPROVING CONVERSION**

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By application accepted for filing on January 14, 2013, The Trust Company, San Antonio, Texas, a state banking association, requested approval to convert to The Trust Company, San Antonio, Texas, a state 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, ability, standing, competence, trustworthiness, and integrity to justify a belief that the trust institution will operate as a state trust company in compliance with 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 or interference with respect to the trust institution's operation as a state trust company in compliance with law.

Consequently, I find that the conversion of The Trust Company, San Antonio, Texas, a state banking association, into The Trust Company, San Antonio, Texas, a state trust association, meets the requirements set forth in TEX. FIN. CODE §182.502 and hereby approve the conversion upon the following condition:

The Trust Company will maintain no less than \$3 million in restricted capital. In the event that restricted capital falls below \$3 million, The Trust Company will take action to restore capital to at least \$3 million by no later than 30 days after the end of the quarter after the event occurs.

**IT IS THEREFORE ORDERED** that the application of The Trust Company, San Antonio, Texas, a state banking association, to convert into The Trust Company, San Antonio, Texas, a state trust association, with no change in location, under Charter Number 1042-36, be and hereby is **APPROVED**.

Signed in triplicate original this 4<sup>th</sup> day of February, 2013.

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