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**Comptroller of the Currency  
Administrator of National Banks**

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Southern District Licensing  
1600 Lincoln Plaza  
500 North Akard  
Dallas, Texas 75201-3323

**Corporate Decision #2008-02  
April 2008**

March 19, 2008

Robert T. Reichert  
First National Bank of the Gulf Coast (In Organization)  
6244 Lee Ann Lane  
Naples, Florida 34109

Re: Operating Subsidiary Application, First National Bank of the Gulf Coast,  
Naples, Florida (In Organization). CAIS Control Nr. 2007-SO-08-0033  
Charter No. 24844

Dear Mr. Reichert:

This is in response to your operating subsidiary application, filed on behalf of First National Bank of the Gulf Coast (In Organization) on November 14, 2007. The bank proposes to establish an operating subsidiary to engage in certain permissible activities. Based on a thorough review of all information available, including the representations and commitments made in the application and by the bank's representatives, I approve the bank's plan to conduct Title Insurance activities through a duly licensed agent within the State of Florida in accordance with the applicable laws and regulations governing this activity. This activity is permissible for National Banks in accordance with 12 C.F.R. 5.34(e)(5)(v) and 15 U.S.C. 6713.

The bank may proceed with its plan in accordance with the proposal. You are reminded that all the conditions of approval applicable to the Preliminary Conditional Approval issued March 12, 2008 remain in effect for this application and are subject to, and are enforceable under, 12 U.S.C. 1818. This includes significant deviations to the proposed business plan submitted.

This preliminary conditional approval and the activities and communications by OCC employees in connection with the filing 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. The foregoing may not be waived or modified by any employee or agent of the OCC or the United States.

Robert T. Reichert

March 19, 2008

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Please direct any questions concerning this preliminary conditional approval to Licensing Analyst Abel Reyna, Jr. or me at 214-720-7052.

Yours truly,

*signed*

Karen H. Bryant  
Director for District Licensing