
APPLICATION

to the

OFFICE OF THE COMPTROLLER OF THE CURRENCY

to organize

WORLD LIBERTY TRUST COMPANY, NATIONAL ASSOCIATION

January 5, 2026

PUBLIC VOLUME

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 World Liberty Trust Company, National Association
Street 1177 Kane Concourse City Bay Harbor Islands State Florida Zip 33154

Holding Company Identifying Information

Name n/a
Street _____ City _____ State _____ Zip _____

Contact Persons

Brandi Reynolds SC Financial Technologies, LLC 4400 Biscayne Blvd, Suite 900 Miami, FL 33137 brandi@worldliberty.com	Mack McCain, Esq. SC Financial Technologies, LLC 4400 Biscayne Blvd, Suite 900 Miami, FL 33137 mack@worldliberty.com
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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.

WLTC Holdings LLC (the "Sponsor"), as sponsor and acting through the named organizers, proposes to organize World Liberty Trust Company, National Association ("World Liberty Trust Co., N.A." or "WLTC"). WLTC will be a *de novo* national trust company chartered by the Office of the Comptroller of the Currency (the "OCC") pursuant to Sections 21-27 of the National Bank Act, located in Miami, Florida. WLTC will not have deposit insurance from the Federal Deposit Insurance Corporation.

Upon opening, WLTC will be a national trust bank engaged in activities permissible under Section 92a of the National Bank Act, including the issuance of USD1, a fiat-backed digital asset designed to maintain a 1-to-1 equivalence to the U.S. dollar. WLTC also will manage the required reserve backing outstanding USD1, comprised of U.S. dollars on deposit in financial institutions as well as U.S. government money market funds, and cash equivalents (the "Reserve") and engage in custodial activities.

The Sponsor's primary goals are to deliver superior financial products and drive mainstream adoption of USD1, which will be issued by WLTC. Along with issuance and redemption of USD1 and maintenance of the required Reserve, WLTC seeks to provide digital asset custody services to institutional investors, as described in detail in Section III.A of WLTC's confidential business plan (the "Confidential Business Plan"), provided at Confidential Exhibit B.

- (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.

This Application (the "Application") is made pursuant to Sections 21-27 of the National Bank Act ("NBA"). These sections of the NBA provide for the formation of national banking associations "for carrying on the business of banking" upon the approval of the OCC. Pursuant to Section 92a of the NBA, national banks may be authorized to act as "trustee... or in any other fiduciary capacity in which State banks, trust companies, or other corporations which come into competition with national banks are permitted to act." The organizers are not aware of any issues concerning the permissibility of WLTC or the activities detailed in the proposed Confidential Business Plan with regard to applicable state or federal laws or regulations.

WLTC requests that the OCC exercise its reservation of authority under 12 C.F.R. § 3.1(d)(4) to exclude the reserves associated with USD1 from the leverage ratio requirements applicable to WLTC. Further justification for such exclusion is provided in Section VII.A.1 of the Confidential Business Plan as set forth in Confidential Exhibit B.

The proposed activities of WLTC are described in Section III.A of the Confidential Business Plan, provided at Confidential Exhibit B.

Section 72 of the NBA requires that, absent a waiver from the Comptroller directors of a national bank must reside:

- 1) within the state in which WLTC is located; or
- 2) within one hundred miles of the location of the office of WLTC for at least one year immediately preceding their election.

WLTC is expected to operate under the direction of five (5) directors, a majority of whom will reside in Florida.

- (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.

A request for WLTC to have full fiduciary powers is contained in the Confidential Business Plan as set forth in Section II of Confidential Exhibit B in accordance with 12 C.F.R. § 5.20(h)(7).

- (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.

There will not be public or private offering materials. The proposed form of stock certificate is provided at Confidential Exhibit E.

- (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 proposed bylaws are provided as Confidential Exhibits C and D, 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.

A copy of the Confidential Business Plan is provided at Confidential Exhibit B.

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.

The organizers of WLTC, each of whom will be a director upon organization of WLTC are:

- 1) Zachary Witkoff
- 2) Scott Alper
- 3) Robert Witkoff
- 4) Erin Baskett
- 5) Jeffrey Weiner

Zachary Witkoff will chair the board of directors of WLTC. Mr. Weiner and Ms. Baskett, each of whom is unaffiliated with any affiliate of WLTC, will serve as independent directors.

WLTC's sole shareholder, the Sponsor, is a limited liability corporation headquartered in Miami, Florida. A full organizational chart is included in Confidential Exhibit A to the Confidential Business Plan, set forth at Confidential Exhibit B.

WLTC's proposed senior executive officers are:

President: Zach Witkoff
Chief Financial Officer: **To Be Identified**
Chief Trust Officer: Mack McCain
Chief Compliance Officer: Brandi Reynolds
Chief Information Security Officer: Chris McNab

Copies of the Interagency Biographical and Financial Report for each proposed director and proposed senior executive officer, along with supporting materials where applicable, are provided in Confidential Exhibits G-1, H-1, I-1, J-1, K-1, L-1, M-1, N-1, and O-1 to this Application.

An Oath of the Bank Director for each proposed director also are provided as Confidential Exhibits G-2, H-2, I-2, J-2, and K-2 to this Application.

Each of WLTC's proposed directors will own a qualifying equity interest in the Sponsor prior to WLTC commencing operations, as required by Section 72 of the National Bank Act and 12 C.F.R. § 7.2005.

- (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.

Zachary Witkoff (Organizer, Proposed President, Proposed Director and Chair of WLTC): Mr. Witkoff is a co-founder of World Liberty Financial, Inc., where he played a pivotal role in the creation and growth of USD1. Mr. Witkoff has also served as President of Witkoff Capital since 2020, where he oversees major investment and development initiatives. Mr. Witkoff earned his Bachelor of Business Administration with a specialization in Real Estate from the University of Miami Herbert Business School in 2015.

Scott Alper (Organizer and Proposed Director of WLTC): Mr. Alper serves as the President and Chief Investment Officer at Witkoff Group and is responsible for overseeing all aspects of Witkoff Group's investments, operations, and financings. He has played a critical role in the development and growth of USD1. He also currently serves on the Board of Governors of the Real Estate Board of New York and as a member of the Board and the Real Estate Roundtable of the Met Council, a non-profit organization dedicated to fighting poverty. Mr. Alper holds a Bachelor of Science from the New York University Stern School of Business.

Robert Witkoff (Organizer and Proposed Director of WLTC): Mr. Robert Witkoff is a former investment advisor with 30 years of investment management and financial oversight experience at The Chubb Corporation, where he served as Co-Chief Investment Officer. In his executive capacity at The Chubb Corporation, Mr. Robert Witkoff worked closely with internal compliance, audit, and finance teams to ensure that all investment activities adhered to regulatory, fiduciary, and capital adequacy standards. Mr. Robert Witkoff holds a Master of Business Administration from NYU Stern School of Business and a Bachelor of Science from Lehigh University.

Jeffrey Weiner (Organizer and Proposed Independent Director of WLTC): Mr. Weiner currently serves as Chairman and CEO of Integrity Automotive Holdings LLC, an automotive dealership group operating across New York, New Jersey, and Connecticut, and as Chairman and CEO of Captivate Entertainment LLC, where he manages significant intellectual property assets and media ventures. Mr. Weiner previously served as Chairman and Chief Executive Officer of Marcum LLP, one of the largest accounting and advisory firms in the United States, where he led the firm's growth from a single office of 20 employees to a top 15 national firm with more than 4,000 professionals. Mr. Weiner holds a Bachelor of Business Administration from Hofstra University.

Erin Baskett (Organizer and Proposed Independent Director of WLTC): Ms. Baskett is a financial, compliance and operational executive. Ms. Baskett currently serves as the Founder and CEO of Sine Qua Non Capital LLC, a brokerage firm, and of Sine Qua Non Global, a consulting services firm that specializes in broker-dealers, registered investment advisors, cryptocurrency platforms, hedge funds and alternative investment firms. Ms. Baskett also serves on the Board of Governors of FINRA. Prior to founding Sine Qua Non Capital LLC and Sine Qua Non Global, Ms. Baskett was the Founding Managing Partner, CCO, and CFO of Autonomous Research US LP, a research provider on financial companies. Ms. Baskett holds a Master of Business Administration from Lindenwood University and a Bachelor of Science from University of Missouri. She is also a Certified Public Accountant.

Director compensation is also set forth in the pro forma financial projections in Confidential Exhibit B to the Confidential Business Plan at Confidential Exhibit B.

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

WLTC will have an Audit and Risk Committee consisting of three directors, as provided in Section V.A.2 of the Confidential Business Plan as set forth in Confidential Exhibit B.

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

WLTC will develop a training program for its directors on various topics relevant to or otherwise required for WLTC's operations. Such program is described in Section V.B.2 of the Confidential Business Plan as set forth in Confidential Exhibit B.

(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.A.3 of the Confidential Business Plan as set forth in Confidential Exhibit B.

(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 currently are no potential management interlocking relationships under 12 U.S.C. §§ 3201-08 that will occur with the establishment or ownership of WLTC.

(g) Describe any potential conflicts of interest.

The organizers are not aware of potential conflicts of interest with respect to the operations of WLTC. WLTC 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 IX of the Confidential Business Plan as set forth in Confidential Exhibit B.

- 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 Sections III.D and VI.A.5.e of the Confidential Business Plan as set forth in Confidential Exhibit B.

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

There have been no such transactions involving the Sponsor and any organizer, director, senior executive officer, shareholder owning or controlling 10 percent or more, and other insiders.

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

See Section III.C of the Confidential Business Plan as set forth in Confidential Exhibit B.

- (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.

See Confidential Exhibit F to the Confidential Business Plan provided at Confidential Exhibit B.

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 of forfeiture” clause.
- 7) Number of shares to be issued or covered by the plans.

See Section V.B.3 of the Confidential Business Plan as set forth in Confidential Exhibit B.

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.)

See Section V.B.3 of the Confidential Business Plan as set forth in Confidential Exhibit B.

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.

WLTC will have a single class of voting common stock that will be issued to the Sponsor, WLTC's sole shareholder. The terms of WLTC's voting common stock may be found in the proposed Articles of Association provided in Confidential Exhibit C. Additional information regarding the capital structure of WLTC is included in Confidential Exhibit A to the Confidential Business Plan as set forth in Confidential Exhibit B.

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

WLTC will not have any noncash contributions to capital. *See* Section VII.A.1 of the Confidential Business Plan as set forth in Confidential Exhibit B.

- (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.

Section VII.A.4 of the Confidential Business Plan, as set forth in Confidential Exhibit B, describes WLTC's proposed capital structure, which was determined after consideration of the factors addressed in OCC Bulletin 2007-21.

- (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.

All shares in WLTC will be issued to its sole shareholder, the Sponsor.

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

No party will receive any fee, commission, or other consideration in connection with the issuance of WLTC's common stock to the Sponsor.

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

WLTC does not plan to 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.

WLTC will maintain its main office in metropolitan Miami, Florida, but plans to offer its services through online channels throughout the United States. *See* Section IV.B of the Confidential Business Plan as set forth in Confidential Exhibit B.

- 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 as set forth in Confidential Exhibit B.

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

See Section IV.C of the Confidential Business Plan as set forth in Confidential Exhibit B.

(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. WLTC plans to limit its operations to those of a trust company and operations incident thereto and will not grant credit to the public in the ordinary course of business. *See* 12 C.F.R. § 25.11(c)(3).

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

Not applicable.

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

Not applicable.

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

Not applicable.

- 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.

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.

WLTC's premises will be located at 1177 Kane Concourse, Bay Harbor Islands, Florida 33154, which is in Dade County. The main office will be in segregated but shared office space in a building with SC Financial Technologies, LLC and World Liberty Financial, Inc., affiliates of WLTC. The building is accessible for persons with disabilities and meets regulatory standards in this regard. The office will not be publicly accessible and access to WLTC's segregated space will be restricted only to authorized personnel.

- (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.

- (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.

WLTC will be located in segregated office space leased by SC Financial Technologies, LLC. No material leasehold improvements are planned other than to segregate the space from

WLTC's affiliates. *See* Section III.G of the Confidential Business Plan as set forth in Confidential Exhibit B.

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

WLTC may open for business in temporary quarters at 1177 Kane Concourse, Bay Harbor Islands, Florida 33154 if approval is granted prior to the completion of permanent office space at that location.

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

WLTC's proposed premises and fixed asset expenditures will conform to applicable statutory limitations.

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

WLTC's security program is discussed in Section VI.A.5.b of the Confidential Business Plan as set forth in Confidential Exhibit B.

- (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.

WLTC's operations will not materially change air or water quality, noise levels, energy consumption, population congestion, waste disposal, or environmental quality of any private land holding within the meaning of the National Environmental Protection Act. Thus, the proposed formation of WLTC and its anticipated activities are not expected to have a detrimental impact 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.

There are no plans to move WLTC's main office or establish branches in 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.⁶
- 4) Reviewed historical records.
- 5) Contact with preservation organizations.
- 6) Other (describe).

Not applicable; 1177 Kane Concourse has not been designated as a landmark in the National Register of Historic Places or any other applicable register for landmarks and historic districts.

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.

WLTC's services will be offered electronically. *See* Section III.A of the Confidential Business Plan as set forth in Confidential Exhibit B.

- (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.4.a-b and VI.A.5.b of the Confidential Business Plan as set forth in Confidential Exhibit B.

- (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 VI.A.4, Section VI.E and Section IX of the Confidential Business Plan as set forth in Confidential Exhibit B.

- (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 Section IX of the Confidential Business Plan as set forth in Confidential Exhibit B.

- (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 Section VI.A.4.b and Section VI.E of the Confidential Business Plan as set forth in Confidential Exhibit B.

- (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 VI.A.4.b and VI.A.5.c of the Confidential Business Plan as set forth in Confidential Exhibit B.

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 Section VI.E of the Confidential Business Plan as set forth in Confidential Exhibit B.

- (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.

WLTC's organizational expenses include fees for legal advisers and tax experts. Organizational expenses have been or will be paid by the Sponsor. WLTC will not incur or reimburse the Sponsor or the organizers for expenses incurred in advance of WLTC's opening, and these organizational expenses are not reflected in the pro forma financial statements filed as Confidential Exhibit B to the Confidential Business Plan as set forth in Confidential Exhibit B.

- (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 Confidential Exhibit D to the Confidential Business Plan as set forth in Confidential Exhibit B.

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

See Section III.A of the Confidential Business Plan as set forth in Confidential Exhibit B.

- (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 VI.A.2-3, VI.A.5.a, VII, and IX the Confidential Business Plan as set forth in Confidential Exhibit B.

- (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.

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
	12/9/25	Zachary Witkoff

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.

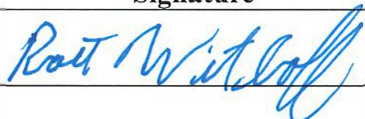
We acknowledge that approval of this application is in the discretion of the appropriate federal banking agency or agencies. Actions or communications, whether oral, written, or electronic, by an agency or its employees in connection with this filing, including approval of the application if granted, 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
		Scott Alper

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.


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Signature	Date	Typed Name
	12/09/2025	Robert Witkoff

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
	12/24/25	Erin Baskett

OCC CERTIFICATION

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Signature	Date	Typed Name
	12/9/25	Jeffrey Weiner

Exhibit A
Form of Public Notice

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

The organizers, identified below, intending to organize and operate a national trust company 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 an uninsured national trust company and propose as follows:

1. That the main/home office of the national bank be located at 1177 Kane Concourse, in Bay Harbor Islands, Florida.
2. That the national bank/Federal savings association will have the following title:
World Liberty Trust Company, National Association.

Organizers

Zach Witkoff, Miami, Florida
Scott Alper, New York, New York
Robert Witkoff, Miami, Florida
Erin Baskett, Miami, Florida
Jeffrey Weiner, New York, New York

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, Office of the Comptroller of the Currency, 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 at Director for Licensing, Office of the Comptroller of the Currency, Midsize, Trust Credit Card and Novel Banks, 400 7th St., SW, 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.