

## **FEDERAL DEPOSIT INSURANCE CORPORATION**

In Re: Stifel Trust Company Delaware, N.A.  
Wilmington, New Castle County, Delaware

Application for Federal Deposit Insurance

### **ORDER**

The undersigned, acting on behalf of the Board of Directors of the Federal Deposit Insurance Corporation (“FDIC”) pursuant to delegated authority, has fully considered all available facts and information relevant to the factors of Section 6 of the Federal Deposit Insurance Act regarding the application for Federal deposit insurance with membership in the Deposit Insurance Fund for Stifel Trust Company Delaware, N.A. (“Bank”), presently a noninsured trust company located at 100 South West Street, Suite 100, Wilmington, New Castle County, Delaware, and has concluded that the application should be approved.

Accordingly, it is hereby ORDERED, for the reasons set forth in the attached Statement, that the application submitted by the Bank for Federal deposit insurance be approved, and the same is hereby approved, subject to the following conditions:

1. That initial paid-in-capital funds of not less than \$22,828,000 shall be provided.
2. That the Tier 1 capital-to-assets leverage ratio (as defined in the FDIC’s capital regulations) be maintained at not less than eight (8) percent throughout the first three (3) years of operation after deposit insurance is effective.
3. That any changes in proposed management or proposed ownership to the extent of ten (10) percent or more of stock, including new acquisitions of or subscriptions to ten (10) percent or more of the stock, shall be approved by the FDIC prior to opening of the Bank. The aforementioned requirement does not apply to the contemplated transfer of ownership of the Bank from Stifel Financial, Inc. to Stifel Bancorp.
4. That with respect to any proposed Bank director or senior executive officer for whom background checks have not been completed, the Bank shall take such action as required by the FDIC if the FDIC objects to any such person based on information obtained during the background check.
5. That as of the date deposit insurance becomes effective, the Bank shall obtain and maintain adequate fidelity coverage.
6. That deposit insurance will not become effective until the Bank has obtained all necessary and final approvals from the appropriate regulatory authorities.

7. That if deposit insurance has not become effective within twelve (12) months from the date of this ORDER, the consent granted herein shall expire, unless the FDIC approves a request for an extension of the deadline prior to the expiration.
8. That until deposit insurance becomes effective, the FDIC shall have the right to alter, suspend, or withdraw its approval should any interim development warrant such action.
9. That this approval is conditioned on the facts as currently known by the FDIC. If there are any material events prior to the opening of the Bank for business, the Bank shall notify the Kansas City Regional Director as soon as the Bank becomes aware of the event, and this approval may be withdrawn or modified.

By Order of the Associate Director, Division of Risk Management Supervision, of the FDIC.

Dated at Washington, D.C. this 23<sup>rd</sup> day of April, 2020.

**FEDERAL DEPOSIT INSURANCE CORPORATION**

By: / S /  
Pete D. Hirsch  
Associate Director  
Division of Risk Management Supervision

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Wilmington, New Castle County, Delaware

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### **STATEMENT**

Pursuant to the provisions of Section 5 of the Federal Deposit Insurance Act (“FDI Act”) (12 U.S.C. §1815), the Federal Deposit Insurance Corporation (“FDIC”) received an Interagency Charter and Federal Deposit Insurance Application on behalf of Stifel Trust Company Delaware, N.A. (“Bank”), an existing, noninsured trust company located at 100 South West Street, Suite 100, Wilmington, New Castle County, Delaware. Notice of the application, in a form approved by the FDIC, was published pursuant to the FDI Act on December 27, 2019.

The FDIC must consider the statutory factors of Section 6 of the FDI Act (12 U.S.C. §1816) when evaluating an application for deposit insurance. These factors relate to the financial history and condition of the depository institution; the adequacy of capital and management; the future earnings prospects; the risk to the Deposit Insurance Fund; the convenience and needs of the community to be served; and the consistency of corporate powers with the FDI Act.

The Bank will be a wholly-owned subsidiary of Stifel Financial Corp., Saint Louis, Missouri, a publicly-traded financial services holding company which provides brokerage, advisory, investment banking, and commercial banking services to individuals and commercial entities through various subsidiaries. Bank ownership will ultimately be transferred to Stifel Bancorp, Saint Louis, Missouri, a bank holding company subsidiary of Stifel Financial Corp.

The Bank’s business plan is for a fiduciary-oriented, special-purpose entity to continue to provide trust and investment advisory services to customers. Additionally, the Bank will accept sweep deposits from an affiliated broker-dealer, with those funds to be invested in marketable securities and interest-bearing balances. No lending activities will occur. Bank operations will continue to be administered by an experienced management team and a knowledgeable Board of Directors that consists of a combination of independent directors and individuals from within the corporate organization.

The Bank’s financial history and condition, capital, and management are satisfactory, and projections for future earnings prospects are favorable. Corporate powers to be exercised are consistent with the FDI Act, and no adverse findings are evident regarding the convenience and needs of the community. No undue risk to the Deposit Insurance Fund is apparent.

Accordingly, based upon careful evaluation of all available facts and information, and in consideration of the factors of Section 6 of the FDI Act, the Associate Director of the Division of Risk Management Supervision, pursuant to delegated authority, has concluded that approval of the application is warranted, subject to certain prudential conditions.

**ASSOCIATE DIRECTOR  
DIVISION OF RISK MANAGEMENT SUPERVISION  
FEDERAL DEPOSIT INSURANCE CORPORATION**