

APPLICATION
to the
OFFICE OF THE COMPTROLLER OF THE CURRENCY
to organize
LASER DIGITAL NATIONAL TRUST BANK

January 27, 2026

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VIA ELECTRONIC DELIVERY

Stephen Lybarger
Senior Deputy Comptroller for Chartering, Organization and Structure
Office of the Comptroller of the Currency
400 7th Street, S.W.
Washington, DC 20219

Re: Charter Application and Confidential Treatment Request for Laser Digital National Trust Bank

Dear Mr. Lybarger:

On behalf of the organizers of Laser Digital National Trust Bank (“LDNTB”), and Laser Digital Americas Group Holdings Inc. (together with its related entities, “Laser Digital”) as the sponsoring organization of LDNTB, we respectfully submit an application to the Office of the Comptroller of the Currency (the “OCC”) to charter LDNTB as a *de novo* national trust bank. The application materials include a main application, a public exhibits volume, a confidential exhibits volume, and an IBFR exhibits volume.

The information contained in the confidential exhibits volume and the IBFR exhibits volume (collectively, the “Confidential Information”) includes information regarding the business strategies and plans of Laser Digital and LDNTB, and other information of a similar nature, the public disclosure of which would result in substantial competitive harm to Laser Digital and LDNTB. The Confidential Information also includes non-public personal information, the public disclosure of which would constitute unwarranted invasion of personal property. Accordingly, confidential treatment is respectfully requested with respect to the Confidential Information pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (the “FOIA”) and the OCC’s regulations implementing the FOIA, 12 C.F.R. Part 4, Subpart B. The Confidential Information may also be exempt from disclosure under other provisions of law.

We also request that, if the OCC should make a preliminary determination not to comply with the request for confidential treatment, Laser Digital and LDNTB be given notice thereof with ample time to permit them to make an appropriate submission as to why such information should be preserved in confidence. If the Confidential Information is the subject of a FOIA request or a request or demand for disclosure by any governmental agency, Congressional office or committee, or court or grand jury, we request, pursuant to the OCC’s regulations, that you notify Laser Digital and LDNTB prior to making such disclosure. We further ask that Laser Digital and LDNTB be furnished with a copy of all written materials pertaining to such request and that Laser Digital and LDNTB be given sufficient advance notice of any intended release so that Laser Digital and LDNTB may, if deemed necessary or appropriate, pursue any available remedies.

PAUL
HASTINGS

Stephen Lybarger
January 27, 2026

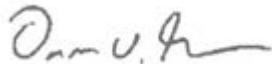
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We sincerely appreciate your time and consideration with respect to the LDNTB charter application. Should you have any questions or require any additional information, please do not hesitate to contact Josh Boehm at (212) 318-6033 or joshboehm@paulhastings.com or Dana Syracuse at (212) 318-6034 or danasyracuse@paulhastings.com.

Sincerely,



Joshua L. Boehm
for PAUL HASTINGS LLP



Dana V. Syracuse
for PAUL HASTINGS LLP

cc: Sebastian Astrada, Office of the Comptroller of the Currency
Purvi Maniar, Organizer for Laser Digital National Trust Bank

LASER DIGITAL NATIONAL TRUST BANK

INTERAGENCY CHARTER APPLICATION

Public Volume

Volume 1

(1 of 3 Volumes)

Contact Person

Purvi Maniar
Chief Legal Officer
Laser Digital Americas
450 Lexington Avenue
New York, NY 10017
purvi.maniar@laserdigital.com

with a copy to:

Josh Boehm & Dana Syracuse
Paul Hastings LLP
200 Park Avenue
New York, NY 10166
joshboehm@paulhastings.com
danasyracuse@paulhastings.com

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

Member Bank
 Nonmember Bank

For OCC: Standard Expedited

Proposed Depository Institution (institution)

Name	Laser Digital National Trust Bank						
Street	450 Lexington Avenue	City	New York	State	NY	Zip	10017

Holding Company Identifying Information

Name	Laser Digital Americas Group Holdings Inc.						
Street	450 Lexington Avenue	City	New York	State	NY	Zip	10017

Contact Person

Purvi Maniar
Chief Legal Officer
Laser Digital

with a copy to:
Josh Boehm &
Dana Syracuse,
Paul Hastings LLP

Name	450 Lexington Avenue	200 Park Avenue
Street	New York, NY 10017	New York, NY 10166
City, State Zip		

Email: purvi.maniar@laserdigital.com

Email: joshboehm@paulhastings.com
danasyracuse@paulhastings.com

Laser Digital National Trust Bank

Interagency Charter Application

Laser Digital National Trust Bank Charter Application List of Exhibits

PUBLIC EXHIBIT	Vol 1
Public Notice	A
Citizenship Waiver Request	B

CONFIDENTIAL EXHIBITS	Vol 2
Business Plan	C
Proposed Form of Articles of Association	D
Proposed Form of Bylaws	E
Proposed Form of Stock Certificates	F
Contact Person Designation	G
Financial Projections	H
Sample Terms of Intercompany Agreements Between LDNTB and Affiliates	I
Laser Digital – Excerpt of Organization Chart	J
Corporate Background and Financial Report (with attachments)	K
Resumes	L

IBFR EXHIBITS	Vol 3
<i>IBFR and Related Materials</i>	

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.

Laser Digital Holdings AG (as an enterprise, “Laser Digital”), as sponsor and acting through the named organizers, proposes to organize Laser Digital National Trust Bank (“LDNTB”) as a *de novo* national trust bank. LDNTB will be chartered by the Office of the Comptroller of the Currency (the “OCC”) pursuant to its authority under Sections 21, 24(Seventh), and 92a of the National Bank Act (the “NBA”), as set forth in this application (this “Application”). LDNTB will be headquartered in New York, New York, and will be a wholly owned subsidiary of Laser Digital Americas Group Holdings Inc. (“Laser Digital Americas”), a direct subsidiary of Laser Digital Holdings AG.

Established in 2022, Laser Digital is the digital asset business unit of the Nomura Group (a publicly traded financial holding company based in Japan), focused on digital asset products and services. Laser Digital’s mission is to be the bridge between traditional and digital finance. Laser Digital provides a comprehensive suite of specialized digital asset services in trading, asset management, and early-stage investing. Currently, Laser Digital operates outside the United States.

As a national trust bank, LDNTB will bring Laser Digital’s suite of regulated products and services to institutional and high-net-worth customers to the U.S. market, complementing the enterprise’s business in several ways. Upon opening, LDNTB will offer a custody solution for digital assets and certain other assets as a fiduciary and provide related services, including customer-directed transactional and staking services. These activities are described in detail in Section II.C of the LDNTB confidential business plan (the “Confidential Business Plan”), provided at Confidential Exhibit C.

(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 is made pursuant to Sections 21 and 24(Seventh) of the NBA. These sections of the NBA provide for 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 have not identified issues concerning the permissibility of LDNTB or its proposed Confidential Business Plan regarding applicable state or federal laws or regulations. Except as expressly set forth in this Application, no regulatory waivers are requested in connection with this Application.

The proposed activities of LDNTB are described briefly in response to item 1(a) above and in detail in Section II.C of the Confidential Business Plan provided at Confidential Exhibit C.

Section 72 of the NBA requires that, every director must be a citizen of the United States unless the Comptroller waives such requirement, in the case of not more than a minority of the total number of directors. LDNTB is expected to operate under the direction of five directors, the majority of whom are citizens of the United States. Because two of the five directors are not citizens of the United States, a citizenship waiver request is submitted as Public Exhibit B for the OCC's consideration. This waiver contains the justification for such request.

A majority of the directors reside in New York or within one hundred miles of the proposed location of LDNTB.

- (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.

As provided in 12 C.F.R. § 5.20(h)(7), the Confidential Business Plan as set forth in Confidential Exhibit C establishes the request for LDNTB to have full fiduciary powers.

- (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 certificates is provided at Confidential Exhibit F.

- (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 at Confidential Exhibits D and E, 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 C.

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 the proposed LDNTB are:

- 1) Steven Ashley
- 2) Darren Burnett
- 3) Brian DeSimone
- 4) Purvi Maniar
- 5) Frank Weigand

LDNTB will have a five-member board of directors consisting of the five organizers listed above. Mr. Ashley will serve as the chair of the board of directors. Mr. Weigand will be an independent director.

LDNTB's sole shareholder will be Laser Digital Americas, a privately held corporation located in New York, New York and incorporated in Delaware. An excerpt of the organization chart for Laser Digital is set forth at Confidential Exhibit J, and a complete list of affiliates and subsidiaries throughout Nomura Group is included in the Corporate Background and Financial Report form set forth at Confidential Exhibit K.

LDNTB's president will be Ms. Maniar, and its Chief Risk Officer will be Mr. DeSimone. Other senior executive officers will include a Trust Officer (and Vice President), Chief Administrative Officer, Chief Financial Officer, BSA Compliance Officer, and Chief Information Security Officer.

Copies of the Interagency Biographical and Financial Report for each proposed organizer / director and proposed senior executive officer, along with supporting materials where applicable, are provided in the confidential IBFR Exhibits enclosed as Volume 3.

Laser Digital Americas will own all the shares of LDNTB aside from the qualifying equity interests in LDNTB owned by each of LDNTB's proposed directors.

(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.

LDNTB's proposed directors, collectively, have significant qualifications and experience in the digital asset products and services, banking and bank regulation, and financial services or financial technology issues relevant to the proposal contained in the Confidential Business Plan as set forth in Confidential Exhibit C. These qualifications are summarized as follows:

Steven Ashley: Steven Ashley, Co-Founder and Executive Chairman of Laser Digital, will serve as the Chairperson of LDNTB, bringing over 35 years of his experience in trading, risk management, and executive leadership in global financial markets. Prior to Laser Digital's formation, Mr. Ashley was the Senior Managing Director and Head of the Wholesale Division at Nomura Group, overseeing global sales, trading, financing, and advisory operations. He also served on Nomura Group's Executive Management Board. Previously, Mr. Ashley held senior leadership roles at RBS and UBS, as well as served on the boards of the Global Financial Markets Association and the UK Fixed Income, Currencies and Commodities Markets Standards Board.

Darren Burnett: Darren Burnett currently serves as Laser Digital's Chief Financial Officer, with over 25 years of financial services and global markets experience related to financial management. Mr. Burnett has contributed over 15 years at Nomura Group, most recently serving as Managing Director and Deputy to the Group Chief Transformation Officer. Mr. Burnett is a Fellow of the Institute of Chartered Accountants in England and Wales. He holds a Bachelor of Science in Chemistry from Durham University and is a graduate of the London Business School "Business of AI: Strategic Leaders" program.

Brian DeSimone: Brian DeSimone will be Chief Risk Officer of LDNTB. He currently serves as the Head of U.S. Risk Management for Laser Digital. Mr. DeSimone brings 11 years of experience across market, operational, credit, liquidity, and execution risk, engaging prudential supervisors across various regulatory spaces. Prior to joining Laser Digital, Mr. DeSimone served as a Director of Clear Street, where he designed and implemented multi-asset class risk systems to support a diversified client base ranging from active retail traders to institutional investors. Mr. DeSimone began his career at Fidelity Investments within the Fidelity Enterprise Risk Management division, where he focused on hedge fund risk management for Fidelity's prime brokerage business. He holds a Master of Science in Financial Analytics from the Stevens Institute of Technology and a Bachelor of Science in Finance from the University of Tampa.

Purvi Maniar: Purvi Maniar will serve as a Director and President of LDNTB. Ms. Maniar is an experienced legal and policy advisor, with over 15 years of experience in regulated financial markets. She currently serves as the Chief Legal officer of Laser Digital, where she advises the company on the design of novel regulated services across trading, asset management, and venture investment in the digital asset ecosystem. Prior to Laser Digital, Ms. Maniar was the General Counsel of FalconX, where she advised on the company's legal and regulatory obligations for its digital asset services. She has also held numerous legal roles at HSBC, Morgan Stanley, Goldman Sachs, and UBS. She holds a Juris Doctor from Brooklyn Law School

and a Bachelor of Arts in International Relations from Johns Hopkins University. Ms. Maniar has also been an advisory board member for The Digital Dollar Project since 2022.

Frank Weigand: Frank Weigand will serve as a Director of LDNTB, bringing over 20 years of bank regulatory and legal experience. Currently, Mr. Weigand is the Chair of Trading & Markets and a Partner at Cahill Gordon & Reindel LLP, positions he has held since November 2023. Prior, Mr. Weigand operated Weigand Consulting Group, counseling clients on a range of legal and regulatory matters in connection with securities offerings. For two years, he was the General Counsel of Oasis Pro Markets LLC. From 2006 to 2021, Mr. Weigand served as in-house legal counsel at HSBC, where he held numerous roles including General Counsel of HSBC Securities (USA) Inc. and Head of Legal (Americas) for HSBC's Markets and Securities Services business line. Mr. Weigand earned a Bachelor of Science in Finance from and a Juris Doctor from Fordham University.

LDNTB's board of directors will set the strategic direction of LDNTB and ensure that LDNTB's senior executive officers are performing to expectations, among other duties and responsibilities. The senior executive officers will be responsible for the day-to-day management of LDNTB's operations. Resumes for each organizer / director are contained in Confidential Exhibit L. Director compensation is described in Section IV.B.4 of the Confidential Business Plan set forth at Confidential Exhibit C.

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

LDNTB will have an Audit Committee of at least three directors, the details of which are provided in Section IV.A.2 of the Confidential Business Plan as set forth in Confidential Exhibit C.

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

LDNTB will design and implement a training program for the board of directors on various, relevant topics regarding the business proposal for LDNTB, as described in Section IV.A.3 of the Confidential Business Plan as set forth in Confidential Exhibit C.

(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 IV.B.2 of the Confidential Business Plan as set forth in Confidential Exhibit C for these details.

(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 are no potential interlocking relationships that would occur with the establishment and ownership of LDNTB as proposed in this Application. As such, no waivers are presently needed.

(g) Describe any potential conflicts of interest.

The organizers are not aware of any potential conflicts of interest with respect to LDNTB. LDNTB will comply with Section 9.12 of the OCC's regulations.

(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).

- 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 Section V of the Confidential Business Plan as set forth in Confidential Exhibit C for these details.

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

See Section V of the Confidential Business Plan as set forth in Confidential Exhibit C for these details.

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

See Section V of the Confidential Business Plan as set forth in Confidential Exhibit C for these details, as well as sample terms contained in Confidential Exhibit I.

- (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. Include in the description:
 - 1) The duration limits.

See the discussion in Section IV.B.4 of the Confidential Business Plan as set forth in Confidential Exhibit C.

- 2) The vesting requirements.

See the discussion in Section IV.B.4 of the Confidential Business Plan as set forth in Confidential Exhibit C.

- 3) Transferability restrictions.

See the discussion in Section IV.B.4 of the Confidential Business Plan as set forth in Confidential Exhibit C.

- 4) Exercise price requirements.

See the discussion in Section IV.B.4 of the Confidential Business Plan as set forth in Confidential Exhibit C.

- 5) Rights upon termination.

See the discussion in Section IV.B.4 of the Confidential Business Plan as set forth in Confidential Exhibit C.

- 6) Any “exercise of forfeiture” clause.

See the discussion in Section IV.B.4 of the Confidential Business Plan as set forth in Confidential Exhibit C.

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

See the discussion in Section IV.B.4 of the Confidential Business Plan as set forth in Confidential Exhibit C.

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.)

As provided in response to item 2.a above, Laser Digital Americas will own all the shares of LDNTB aside from the qualifying equity interests in LDNTB owned by each of LDNTB’s proposed directors.

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.

LDNTB will issue common stock and preferred stock. *See LDNTB’s proposed form of Articles of Association as set forth in Confidential Exhibit D and the proposed form of stock certificates as set forth in Confidential Exhibit F for additional details.*

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

LDNTB will not have noncash contributions to capital.

(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.

See Section VI.A.4 of the Confidential Business Plan as set forth in Confidential Exhibit C for the details regarding LDNTB's proposed capital structure, which was determined in accordance with OCC Bulletin 2007-21 – Supervision of National Trust Banks: Revised Guidance: Capital and Liquidity.

(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.

As provided in response to item 2.a above, Laser Digital Americas will own all the shares of LDNTB aside from the qualifying equity interests in LDNTB owned by each of LDNTB's proposed directors. The purchase of shares will not be financed by debt.

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

No recipient will receive any fee, commission, or other consideration in connection with the sale of LDNTB's stock.

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

LDNTB will not 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.

While LDNTB will be located in New York, New York, the organizers plan for LDNTB to operate in various U.S. and non-U.S. jurisdictions, where permitted. *See Sections III.B–C of the Confidential Business Plan as set forth in Confidential Exhibit C.*

- 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 III.D of the Confidential Business Plan as set forth in Confidential Exhibit C.

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

See Sections III.B–D of the Confidential Business Plan as set forth in Confidential Exhibit C.

(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. LDNTB will not be subject to the CRA pursuant to 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. LDNTB will not be subject to the CRA pursuant to 12 C.F.R. § 25.11(c)(3).

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

Not applicable. LDNTB will not be subject to the CRA pursuant to 12 C.F.R. § 25.11(c)(3).

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

Not applicable. LDNTB will not be subject to the CRA pursuant to 12 C.F.R. § 25.11(c)(3).

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. LDNTB will not be subject to the CRA pursuant to 12 C.F.R. § 25.11(c)(3).

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.

LDNTB will maintain its office in a segregated space located at 450 Lexington Avenue, New York, New York. The office space is currently leased by Laser Digital Americas. The building is accessible for persons with disabilities and meets regulatory standards in this regard. The office is not publicly accessible and access to LDNTB's segregated space will be restricted to authorized personnel.

See Sections IV.C.3 and VI.E of the Confidential Business Plan as set forth in Confidential Exhibit C for information about insurance.

(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.

Because LDNTB will not purchase or construct its premises but rather will be within premises currently leased by Laser Digital Americas, this item is 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.

LDNTB will be located in segregated space in premises leased by Laser Digital Americas. No leasehold improvements are planned. *See Section II.H of the Confidential Business Plan as set forth in Confidential Exhibit C for additional details.*

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

Because LDNTB will not utilize temporary quarters, this item is not applicable.

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

LDNTB'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

See Section V.A.1.d of the Confidential Business Plan as set forth in Confidential Exhibit C for details about LDNTB's proposed security program.

(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.

The proposed formation of LDNTB and its anticipated activities are not expected to have a detrimental impact on the quality of 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.

LDNTB does not have any current plans to relocate the main office within the first three years. LDNTB intends to establish its main office prior to commencing operations.

(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).

The main office is not included as a landmark in the National Register of Historic Places.

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.

The organizers plan for LDNTB to market its products and services via electronic means, including by website or mobile application. *See Sections II and III of the Confidential Business Plan as set forth in Confidential Exhibit C.*

(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 V.A.1.d and V.A.2.b of the Confidential Business Plan as set forth in Confidential Exhibit C for additional details.

(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 V.A.2.a and V.F of the Confidential Business Plan as set forth in Confidential Exhibit C for additional details.

(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 VIII of the Confidential Business Plan as set forth in Confidential Exhibit C, as well as the financial projections as set forth in Confidential Exhibit H, for additional details.

(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 V.A.2.a–b of the Confidential Business Plan as set forth in Confidential Exhibit C for additional details

(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 V.A.1.e and V.A.2.b of the Confidential Business Plan as set forth in Confidential Exhibit C for additional details.

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 V.F of the Confidential Business Plan as set forth in Confidential Exhibit C.

(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.

LDNTB's organization expenses include fees for professional services, including for legal advice, consulting, and tax expertise. Organizational expenses have been or will be paid by Laser Digital as the corporate sponsor of LDNTB's application. LDNTB will not incur or reimburse Laser Digital for expenses incurred in advance of LDNTB's opening, and these organizational expenses are not reflected in the financial projections provided in Section VIII of the Confidential Business Plan as set forth in Confidential Exhibit C or in Confidential Exhibit H.

(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 IV.C.3 of the Confidential Business Plan as set forth in Confidential Exhibit C for additional details.

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

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

(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 V and VI of the Confidential Business Plan as set forth in Confidential Exhibit C.

(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.

Footnotes

¹ See applicable state requirements.

² See 12 C.F.R. 25.41, 345.41, 195.41.

³ See 12 C.F.R. 25.21(b), 345.21(b), 195.21.

⁴ See 12 C.F.R. 25.21(a), 345.21(a), 195.21.

⁵ See 12 C.F.R. 21, 326, 168.

⁶ See 36 C.F.R. 60.4.

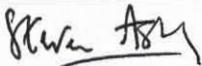
⁷ Independent tests should cover general and environmental controls as well as audit, monitoring, and balancing controls. Independent testing will provide an objective opinion on the adequacy of these controls.

⁸ See 15 U.S.C. 6801, 6805(b); 12 C.F.R. 30; 308 and 364; 168 and 170.

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
	21 Jan 2026	Steven Ashley

OCC CERTIFICATION

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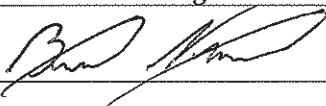
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Signature	Date	Typed Name
DBurnett	22/1/26	Darren Burnett

OCC CERTIFICATION

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Signature	Date	Typed Name
	1120/2026	Brian DeSimone

OCC CERTIFICATION

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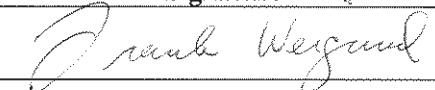
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Signature	Date	Typed Name
	1/20/26	Purvi Maniar

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
	1/21/2024	Frank Weigand

Laser Digital National Trust Bank

Public Exhibits

Public Exhibit A

Public Notice

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

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

1. That the national trust bank will have the following title: Laser Digital National Trust Bank.
2. That the main office of the national trust bank will be located at 450 Lexington Avenue, New York, New York 10017.

The organizers and sponsoring organization of Laser Digital National Trust Bank are:

Steven Ashley
Darren Burnett
Brian DeSimone
Purvi Maniar
Frank Weigand

Laser Digital Holdings AG, Bahnhofplatz 1, Zurich, Switzerland.

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 Sebastian Astrada, Director for Licensing, 400 7th St., SW, Washington, DC, or by emailing LicensingPublicComments@occ.treas.gov. A person who wishes to view the public file should submit a request to Sebastian Astrada, Director for Licensing, 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.

Public Exhibit B

Citizenship Waiver Request

Citizenship Waiver Request

Applicant

Name Laser Digital National Trust Bank _____ Charter Number TBD _____
Street Address 450 Lexington Avenue _____
City New York _____ County New York _____ State NY _____ Zip Code 10017 _____

Parent Company Identifying Information (if applicable):

Name Laser Digital Americas Group Holdings Inc. _____
Street Address 450 Lexington Avenue _____
City New York _____ State NY _____ Zip Code 10017 _____

Contact Person:

Name Purvi Maniar _____ Title Organizer _____
Employer Laser Digital Americas Group Holdings Inc. _____
Street Address 450 Lexington Avenue _____
City New York _____ State NY _____ Zip Code 10017 _____
Phone No. _____ Fax No. _____
E-mail purvi.maniar@laserdigital.com _____

1. Overview

Include the following information:

- Name of board member(s) seeking waiver.

The following proposed board members of the proposed Laser Digital National Trust Bank (“LDNTB”) are seeking waiver:

1. Steven Ashley, a citizen of the United Kingdom
2. Darren Burnett, a citizen of the United Kingdom

- A discussion of the qualifications and experience of the proposed director(s) and how they apply to the bank’s services, business plan goals, or market areas.

Based on the following qualifications and experience, the organizers have concluded that the board of directors of the proposed LDNTB can provide effective oversight of the trust bank’s services, business plan goals, and market areas.

Steven Ashley: Steven Ashley will serve as the Chairperson of LDNTB, bringing over 35 years of his experience in trading, risk management, and executive leadership in global financial markets. Mr. Ashley is the Co-Founder and Executive Chairman of Laser Digital. Prior to Laser Digital's formation, Mr. Ashley was the Senior Managing Director and Head of the Wholesale Division at Nomura Group, overseeing global sales, trading, financing, and advisory operations. He also served on Nomura Group's Executive Management Board. Previously, Mr. Ashley held senior leadership roles at RBS and UBS, as well as served on the boards of the Global Financial Markets Association and the UK Fixed Income, Currencies and Commodities Markets Standards Board. With this experience, Mr. Ashley offers significant institutional knowledge to LDNTB's board of directors in support of the overarching, enterprise-wide mission.

Darren Burnett: Darren Burnett will serve as a Director of LDNTB, with over 25 years of financial services and global markets experience related to financial management. Mr. Burnett currently serves as the Chief Financial Officer of Laser Digital. Mr. Burnett has contributed over 15 years at Nomura Group, most recently serving as Managing Director and Deputy to the Group Chief Transformation Officer. Mr. Burnett is a Fellow of the Institute of Chartered Accountants in England and Wales. He holds a Bachelor of Science in Chemistry from Durham University and is a graduate of the London Business School "Business of AI: Strategic Leaders" program. Mr. Burnett's financial management experience, coupled with his certification and understanding of novel technologies and services, provides the board of directors with special insight as applied to the proposed business plan for LDNTB, including as related to LDNTB's digital asset-related activities.

Brian DeSimone: Brian DeSimone will serve as a Director of LDNTB. He currently serves as the Head of U.S. Risk Management. Mr. DeSimone brings 11 years of experience across market, operational, credit, liquidity, and execution risk, engaging prudential supervisors across various regulatory spaces. Prior to joining Laser Digital, Mr. DeSimone served as a Director of Clear Street, where he designed and implemented multi-asset class risk systems to support a diversified client base ranging from active retail traders to institutional investors. Mr. DeSimone began his career at Fidelity Investments within the Fidelity Enterprise Risk Management division, where he focused on hedge fund risk management for Fidelity's prime brokerage business. With this background, Mr. DeSimone will help shape the risk management for LDNTB and the board of director's role in that regard and particularly as related to the U.S. market.

Purvi Maniar: Purvi Maniar will serve as the President of LDNTB. Ms. Maniar is an experienced legal and policy advisor, with over 15 years of experience in regulated financial markets. She currently serves as the Chief Legal officer of Laser Digital, where she advises the company on the design of novel regulated services across trading, asset management, and venture investment in the digital asset ecosystem. Prior to Laser Digital, Ms. Maniar was the General Counsel of FalconX, where she advised on the company's legal and regulatory obligations for its digital asset services. She has also held numerous legal roles at HSBC, Morgan Stanley, Goldman Sachs, and UBS. Based on these roles, Ms. Maniar brings extensive knowledge and expertise in banking services and their regulatory oversight to LDNTB's services.

Frank Weigand: Frank Weigand will serve as a Director of LDNTB, bringing over 20 years of bank regulatory and legal experience. Currently, Mr. Weigand is the Chair of Trading & Markets and a Partner at Cahill Gordon & Reindel LLP, positions he has held since November 2023. Prior, Mr. Weigand operated Weigand Consulting Group, counseling clients on a range of legal and regulatory matters in connection with securities offerings. For two years, he was the General Counsel of Oasis Pro Markets LLC. From 2006 to 2021, Mr. Weigand served as in-house legal counsel at HSBC, where he held numerous roles including General Counsel of HSBC Securities (USA) Inc. and Head of Legal (Americas) for HSBC's Markets and Securities Services business line.

- The biographical portion only of the Interagency Biographical and Financial Report for each proposed director.

The organizers of the proposed LDNTB submitted an Interagency Biographical and Financial Report for each proposed director as part of the application to form LDNTB.

2. Upon election to the board of directors and upon approval of this request, indicate the number of directors who are United States citizens and the number of directors who are not United States citizens.

Three of the five identified and proposed directors for the proposed LDNTB are citizens of the United States. Two of the five identified and proposed directors for the proposed LDNTB are not citizens of the United States.

OCC CERTIFICATION

I certify that the bank's board of directors, shareholders or a designated official has authorized the filing of this application. I certify that the information contained in this application has been examined carefully and is true, correct, complete and current as of the date of this submission. Additionally, I agree to notify the OCC if the facts described in the filing materially change prior to receiving a decision or at any time prior to consummation of the action contemplated herein.

I acknowledge that any misrepresentation or omission of a material fact with respect to this application, any attachments to it, and any other documents or information provided in connection with this application may be grounds for denial of the application or revocation of its approval, and may subject the undersigned to legal sanctions, including the criminal sanctions provided for in Title 18 of the United States Code.

I acknowledge that the approval of this application is in the discretion of the OCC. The activities and communications by OCC employees in connection with the filing, including approval of the application if granted, 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. I further acknowledge that the foregoing may not be waived or modified by any employee or agent of the OCC or the United States.



President or other authorized officer

Purvi Maniar

Typed Name

Organizer

Title

Laser Digital Americas Group Holdings Inc.
Employer