FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

In the Matter of AMAR ALI, as an institution-affiliated party of SPECTRA BANK FORT WORTH, TEXAS (INSURED STATE NONMEMBER BANK) RESPONDENT'S NMLS UI# N/A	NOTICE OF INTENTION TO PROHIBIT FROM FURTHER PARTICIPATION, NOTICE OF CHARGES FOR AN ORDER FOR RESTITUTION, FINDINGS OF FACT AND CONCLUSIONS OF LAW, NOTICE OF HEARING and PRAYER FOR RELIEF FDIC-23-0037e FDIC-24-0111b

The Federal Deposit Insurance Corporation (FDIC) has determined that Respondent Amar Ali (Respondent) was a director at Spectra Bank, Fort Worth, Texas (Bank), and an institution-affiliated party (IAP) of the Bank. Respondent, directly or indirectly, engaged in or participated in unsafe or unsound practices in connection with the Bank, and breached fiduciary duties owed to the Bank between 2018 and 2019. Respondent's practices and breaches caused the Bank to suffer financial loss, and Respondent received financial gain. Respondent's practices and breaches involved personal dishonesty and demonstrated his willful and continuing disregard for the safety or soundness of the Bank.

NOTICE OF INTENTION TO PROHIBIT FROM FURTHER PARTICIPATION AND FOR RESTITUTION

The FDIC issues this Notice of Charges, Notice of Intention to Prohibit from Further

Participation and Findings of Fact and Conclusions of Law and Notice of Hearing (collectively, Notice) under 12 U.S.C. §§ 1818(b), 1818(e) and the FDIC Rules of Practice and Procedure, 12 C.F.R. part 308, subparts A and B. This proceeding will determine whether an order should be issued against Respondent under 12 U.S.C. § 1818(e) to prohibit Respondent from further participation in the conduct of the affairs of the Bank, and any other insured depository institution or organization listed in 12 U.S.C. §1818(e)(7)(A) without the prior written approval of the FDIC and other appropriate Federal financial institutions regulatory agency. This proceeding will further determine whether an order for restitution should be entered against Respondent under 12 U.S.C. § 1818(b)(6).

FINDINGS OF FACT AND CONCLUSIONS OF LAW

The FDIC further issues this Findings of Fact and Conclusions of Law, under the FDIC Rules of Practice and Procedure, 12 C.F.R. part 308, subparts A and B. The FDIC makes the following allegations against Respondent:

I. Jurisdiction

1. At all times described herewith, the Bank was a corporation existing and doing business under the laws of the State of Texas, with its principal place of business in Fort Worth, Texas.

2. At all times described herewith, the Bank was an insured State nonmember bank, subject to 12 U.S.C. §§ 1811-1831aa, 12 C.F.R. Chapter III, and laws of the State of Texas.

3. At all times described herewith, Respondent served as a director for the Bank.

4. At all times described herewith, Respondent was an IAP of the Bank under 12 U.S.C. § 1813(u), and for purposes of 12 U.S.C. §§ 1818(b), 1818(e)(7) and 1818(j).

5. The FDIC has jurisdiction over the Bank, Respondent, and the subject matter of this proceeding.

II. Respondent's Unsafe or Unsound Practices and Breaches of Fiduciary Duty

6. Respondent:

a. Caused the Bank to extend credit to an entity he owned based on misrepresentations regarding his income as the guarantor; and

b. Caused the Bank to extend immediate credit to himself and his related entities in the form of cashier's checks drawn on the Bank and premised on uncollected funds.

First Loan to A to Z Wholesale Wine & Spirits, LLC

7. In or about October 2014, the Bank originated a revolving line of credit (First Loan) in the amount of $700,000 for A to Z Wholesale Wine & Spirits, LLC (AZWS), an entity of which Respondent held ownership.

8. On or about March 14, 2018, the Bank renewed the First Loan and modified it to approximately $793,000. At the time of this renewal, Respondent owned at least 95% of AZWS.

9. Respondent served as the guarantor in his individual capacity for the renewal. In support of the guaranty, Respondent misrepresented to the Bank that his individual income for 2017 was approximately $431,000.

10. The First Loan resulted in a loss to the Bank in the amount of $571,577, which the Bank charged off on or about September 30, 2019.

Second Loan to A to Z Wholesale Wine & Spirits, LLC

11. On or about March 14, 2018, near the same date as the renewal of the First Loan,

the Bank extended a second revolving line of credit to AZWS in the amount of $800,000 (Second Loan).

12. Respondent served as the guarantor in his individual capacity for the Second Loan. In support of the guaranty, Respondent misrepresented to the Bank that his net income for 2017 was approximately $431,000.

13. On or about April 26, 2019, the Bank renewed the Second Loan to AZWS that the Bank originated in the amount of $800,000. The Bank modified the amount of credit to approximately $316,000.

14. The Second Loan to AZWS that the Bank originated March 2018, and renewed in April 2019, resulted in a loss to the Bank of $295,952, which the Bank charged off on September 30, 2019.

Respondent's Immediate Credit on Uncollected Funds

15. At all times described herewith, Respondent maintained individual and business accounts at the Bank (Bank Accounts).

16. From approximately December 2016 through August 2019, Respondent deposited or caused to be deposited multiple checks into his Bank Accounts that were drawn on accounts he managed at other banks (Outside Accounts). At the time of said deposits, the funds that were drawn on the Outside Accounts and deposited into Respondent's Bank Accounts had not yet been collected. Furthermore, the checks drawn on the Outside Accounts frequently had insufficient funds to cover the checks deposited into Respondent's Bank Accounts. Nevertheless, Respondent obtained cashier's checks from the Bank premised on the uncollected funds. The cashier's checks that Respondent obtained were drawn on the Bank's "cashier's check account."

17. On or about August 27, 2019, Bank management met with Respondent and admonished him for what they advised him was “check kiting.”

18. Between August 26, 2019, and August 29, 2019, Respondent deposited or caused to be deposited multiple checks into his Bank Accounts that were drawn on insufficient funds in the Outside Accounts. Immediately after these deposits, Respondent obtained cashier’s checks from the Bank, which he deposited into the Outside Accounts, resulting in Respondent obtaining approximately $2,000,000 in cashier’s checks premised on uncollected funds.

Effect of Misconduct

19. As a result of Respondent’s misconduct, the Bank extended credit (the First and Second Loans) to an entity Respondent owned based on his misrepresentations about his personal income.

20. As a result of Respondent’s misconduct, the Bank extended immediate credit to Respondent in the form of cashier’s checks drawn on the Bank and premised on uncollected funds.

21. As a result of Respondent’s misconduct, Respondent was enriched by $867,529, the sum of the amounts charged off by the Bank because of the First and Second Loans.

III. Conclusions of Law

22. Based on the misconduct described above, Respondent engaged in or participated in unsafe or unsound practices in connection with the Bank under 12 U.S.C. § 1818(e).

23. Respondent’s acts and practices described above were breaches of Respondent’s fiduciary duties as a director of the Bank under 12 U.S.C. § 1818(e). Respondent’s practices and breaches described above resulted in Respondent’s financial gain under 12 U.S.C. § 1818(e).

24. Respondent's practices and breaches described above resulted in financial loss to the Bank under 18 U.S.C. § 1818(e).

25. Respondent's practices and breaches described above demonstrate Respondent's willful and continuing disregard of the safety and soundness of the Bank under 12 U.S.C. § 1818(e).

26. Respondent's practices and breaches described above demonstrate Respondent's personal dishonesty under 12 U.S.C. § 1818(e).

27. By virtue of Respondent's unsafe or unsound practices, the Bank lost the sum of $867,529 and Respondent was unjustly enriched in the same amount of $867,529 under 12 U.S.C. § 1818(b).

NOTICE OF HEARING

Respondent must file an Answer to object to the Notice within 20 days from the date of service under 12 C.F.R. § 308.19. A formal hearing on the Notice will be held. The hearing will be held before an Administrative Law Judge (ALJ) assigned by Office of Financial Institution Adjudication (OFIA) under 5 U.S.C. § 3105. The hearing on the Notice will begin on a date set by the ALJ in Fort Worth, Texas, or in another location set by the ALJ. The hearing will be public and conducted in accordance with 12 U.S.C. §§ 1811-1831aa, the Administrative Procedure Act, 5 U.S.C. §§ 551-559, and 12 C.F.R. Part 308, subparts A and B.

An original and one copy of all papers filed in this proceeding must be served upon OFIA, 3501 N. Fairfax Drive, Suite VS-D8116, Arlington, VA 22226-3500, in the manner specified at 12 C.F.R. § 308.10. Also, copies of all papers filed in this proceeding must be served upon the following: FDIC Administrative Officer, 550 17th N.W., Washington, D.C. 20429; Seth P.

Rosebrock, Assistant General Counsel, Enforcement Section, Legal Division, 550 17th Street NW, Room F St-2076, Washington, DC 20429; Shirley Huang, Supervisory Counsel, Enforcement Section, Legal Division, 25 Jessie Street, Room RO-SF-1432, San Francisco, California 94105; and Regional Counsel Stephen C. Zachary, Dallas Regional Office, 600 North Pearl Street, Suite 700, Dallas, Texas, 75201. Respondents are encouraged to file any subsequent documents electronically with OFIA at ofia@fdic.gov.

PRAYER FOR RELIEF

The FDIC prays that an Order of Prohibition under 12 U.S.C. § 1818(e) be issued against AMAR ALI. The FDIC prays further that an Order for Restitution under 12 U.S.C. § 1818(b) be issued against AMAR ALI, ordering him to pay restitution to the Bank in the amount of $867,529.

Issued under delegated authority on May 28, 2025.

_/s/______________________
Ryan Billingsley
Acting Director
Division of Risk Management Supervision