

FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

_____	)	
In the Matter of	)	
	)	
LIBERTAD BANK, SSB	)	ORDER TO PAY
AUSTIN, TEXAS	)	
	)	FDIC-11-364k
(Insured State Nonmember Bank)	)	
_____	)	

Libertad Bank, SSB, Austin, Texas (Bank), and a representative of the Legal Division of the Federal Deposit Insurance Corporation (FDIC) executed a "Stipulation and Consent to the Issuance of an Order to Pay" (Stipulation) dated December 21, 2011, whereby the Bank, solely for the purpose of this proceeding and without admitting or denying any and all charges of violations of any law, rule, or regulation, consented and agreed to pay a civil money penalty in the amount specified below to the Treasury of the United States.

The FDIC considered the matter and determined that the Bank violated the prohibition against unfair and deceptive acts or practices found in Section 5 of the Federal Trade Commission Act (15 U.S.C. § 45(a)) by engaging in deceptive acts or practices in connection with its prepaid stored value cards program.

After taking into account the Stipulation, the appropriateness of the penalty with respect to the size of financial resources and good faith of the Bank, as demonstrated, in part, by its voluntary payment of reimbursement to harmed consumers, the gravity of the violation, the history of previous violations by the Bank, and such other matters as justice may require, the FDIC accepts the Stipulation and issues the following:

ORDER TO PAY

IT IS HEREBY ORDERED, that by reason of the alleged violations set forth in the Stipulation, a penalty of \$40,000.00 is assessed against the Bank. The Bank shall pay such amount to the Treasury of the United States.

IT IS FURTHER ORDERED, that the Bank is prohibited from seeking or accepting indemnification from any affiliated depository institution holding company, or affiliate thereof, as defined at 12 C.F.R. § 215.2(a), for the civil money penalty assessed and paid in this matter.

This Order to Pay will become effective upon its issuance by the FDIC.

Pursuant to delegated authority.

Dated at Washington, DC this 29th day of February, 2012

/s/
Sylvia Plunkett
Senior Deputy Director
Division of Depositor and Consumer Protection