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February 2, 2026

Chameen K. Letourneau  
Supervision Manager, Mergers & Acquisitions  
Federal Reserve Bank of Chicago  
230 South LaSalle Street  
Chicago, Illinois 60604

**Re: Response to Federal Reserve Bank of Chicago Letter dated January 23, 2026, Requesting Additional Information on Applications and Related Filings Submitted by Enova International, Inc.**

Dear Ms. Letourneau:

We write in response to your letter dated January 23, 2026, which acknowledged receipt of the application (the “Application”) submitted on behalf of Enova International, Inc., Chicago, Illinois (“Enova” or the “Applicant”), for prior approval of the Board of Governors of the Federal Reserve System (the “Board”) pursuant to Section 3(a)(1) of the Bank Holding Company Act of 1956, as amended, and Section 225.15 of Regulation Y, to become a bank holding company by acquiring Grasshopper Bancorp, Inc. (“Grasshopper”) and Grasshopper Bank, National Association, (“Grasshopper Bank”).

Your request letter included one public request, followed by a list of confidential requests. Your public request (numbered as Request I.A) stated: **“When available, please provide the publication affidavits for the newspaper notices for the *Wall Street Journal* and *Chicago Tribune*.”** In connection with the Application, Enova published notice on January 21, 2026 in the *Chicago Tribune* and the *Wall Street Journal*. We have included copies of the publication affidavits for each of these notices as Public Exhibit 1.

We also have included with this response a Confidential Volume, which lists your confidential requests and includes narrative responses and responsive exhibits.

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Enova requests confidential treatment of the enclosed Confidential Volume, and all information contained therein (collectively, the “Confidential Information”).

The Confidential Information consists of highly sensitive business and regulatory information that is proprietary in nature and not available to the public. Disclosure of any Confidential Information to the public, to a federal or state government agency, or to any third party could result in substantial harm to the competitive position of the Applicant and its affiliates. In particular, the Confidential Information includes confidential commercial and financial information that relates to the business, personnel, and financial affairs of the Applicant and its affiliates, the disclosure of which could provide competitors with direct knowledge of the business plans and activities of the Applicant and its affiliates, to the material detriment of their competitive position.

The Confidential Information includes confidential commercial or financial information, furnished in confidence, that is customarily and actually treated as private for purposes of Exemption 4 of the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552(b)(4). We are providing this information on the basis of the assurances of privacy accorded to such information established in 12 C.F.R. § 261.15(b)(4). *See Food Mktg. Inst. v. Argus Leader Media*, 588 U.S. 427, 440 (2019) (“[W]here commercial or financial information is both customarily and actually treated as private by its owner and provided to the government under an assurance of privacy, the information is ‘confidential’ within the meaning of [FOIA] Exemption 4.”). The Confidential Information also includes financial records containing sensitive personal information, furnished in confidence, the disclosure of which would constitute a clearly unwarranted invasion of the personal privacy of individuals associated with the Applicant for purposes of FOIA Exemption 6. *See* 12 C.F.R. § 261.15(b)(6).

The Confidential Information also contains information that is confidential pursuant to Exemption 8 of the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552(b)(8), implemented at 12 C.F.R. § 261.15(a)(8).

The Confidential Information accordingly is exempt from public disclosure under FOIA and Federal Reserve implementing regulations. We respectfully request that we be notified in advance and given an opportunity to be heard if it is proposed that the Confidential Information be made public. *See* Executive Order 12,600 (June 23, 1987).

In addition, we request, pursuant to FOIA and applicable Federal Reserve regulations and for reasons including those set forth above, that any memoranda, notes, or other writings of any kind whatsoever made by an employee, agent, or any person under the control of the Federal Reserve (or any other governmental agency) that incorporate, include, or relate to any of the matters referred to in the Confidential Information (i) furnished by the Applicant or its respective employees or agents to the Federal Reserve (or any other governmental agency) or (ii) referred to in any

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conference, meeting, telephone conversation or interview between (a) employees, former employees, representatives, agents or counsel of the Applicant and (b) employees, agents or any persons under the control of the Federal Reserve, be maintained in confidence, not be made part of any public record, and not be disclosed to any person.

Finally, the Confidential Information includes information that is protected by the attorney-client privilege and other applicable privileges and protections. The Applicant's disclosure of this information to the Federal Reserve does not waive, destroy, or otherwise affect applicability of any such protections. 12 U.S.C. § 1828(x).

\* \* \*

If you have any questions with respect to the Application, please do not hesitate to contact me at (202) 662-5727 or [mnonaka@cov.com](mailto:mnonaka@cov.com).

Sincerely,



Michael Nonaka

### Enclosures

cc: Steven Cunningham, Chief Executive Officer, Enova International, Inc.  
Mike Butler, Chief Executive Officer, Grasshopper Bank  
Jennifer Grandy, Senior CRSB Examiner – Mergers and Acquisitions, Federal Reserve Bank of Chicago  
Rachel Grundmeier, Federal Reserve Bank of Chicago  
Colette Fried, Assistant Vice President, Mergers, Acquisitions, and Enforcement, Federal Reserve Bank of Chicago  
Naima A. Jefferson, Board of Governors of the Federal Reserve System  
Patrick M. Grant, Board of Governors of the Federal Reserve System  
David E. Cohen, Board of Governors of the Federal Reserve System

**Response to January 23, 2026 Federal Reserve Bank of Chicago Letter  
regarding application of Enova International, Inc. to become a bank  
holding company by acquiring Grasshopper Bancorp, Inc. and thereby  
indirectly acquire Grasshopper Bank, National Association through merger  
with Enova Interim Bank, N.A., South Jordan, Utah**

**Public Exhibit 1 – Newspaper Notice Information**

Submitted to the Federal Reserve Bank of Chicago on February 2, 2026

# Chicago Tribune

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Classified Advertising: 7921684  
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Certificate of Publication:

State of Illinois - Cook

**Chicago Tribune Media Group** does hereby certify that it is the publisher of the Chicago Tribune. The Chicago Tribune is a secular newspaper, has been continuously published Daily for more than fifty (50) weeks prior to the first publication of the attached notice, is published in the City of Chicago, State of Illinois, is of general circulation throughout that county and surrounding area, and is a newspaper as defined by 715 IL CS 5/5.

This is to certify that a notice, a true copy of which is attached, was published 1 time(s) in the Chicago Tribune, namely one time per week or on 1 successive weeks. The first publication of the notice was made in the newspaper, dated and published on 1/21/2026, and the last publication of the notice was made in the newspaper dated and published on 1/21/2026.

This notice was also placed on a statewide public notice website as required by 715 ILCS 5/2. 1.

On the following days, to-wit: **Jan 21, 2026**.

Executed at Chicago, Illinois on this

22nd Day of January, 2026, by

**Chicago Tribune Company**



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Jeremy Gates

# Chicago Tribune

## NOTICE OF APPLICATION FOR FORMATION OF BANK HOLDING COMPANY

Enova International, Inc., Chicago, Illinois, has applied to the Federal Reserve Board for permission to become a bank holding company by acquiring Grasshopper Bancorp, Inc., New York, New York, 10016, and thereby indirectly acquiring Grasshopper Bank, National Association, with its main office in New York, New York, 10016 and acquiring control of Enova Interim Bank, National Association, a temporary interim bank with its main office in South Jordan, Utah. Grasshopper Bank will merge into Enova Interim Bank with Grasshopper Bank continuing as the resulting bank. The resulting bank's main office will be in South Jordan, Utah. The Federal Reserve considers a number of factors in deciding whether to approve the application including the record of performance of banks we own in helping to meet local credit needs.

You are invited to submit comments in writing on this application to Colette A. Fried, Assistant Vice President, Federal Reserve Bank of Chicago, 230 South LaSalle Street, Chicago, IL 60604. The comment period will not end before February 20, 2026, and may be somewhat longer. The Board's procedures for processing applications/notices may be found at 12 C.F.R. Part 262. Procedures for processing protested applications/notices may be found at 12 C.F.R. 262.25. To obtain a copy of the Federal Reserve Board's procedures, or if you need more information about how to submit your comments on the application, contact Suchi Saxena, Community Affairs Officer and Vice President, Community Development, at (312) 322-4357; to request a copy of an application, contact Colette A. Fried at (312) 322-6846. The Federal Reserve will consider your comments and any request for a public meeting or formal hearing on the application if they are received in writing by the Reserve Bank on or before the last day of the comment period.

1/21/26 7921684

**AFFIDAVIT**

STATE OF NEW JERSEY                    )  
  ) ss:  
CITY OF MONMOUTH JUNCTION, in the COUNTY OF MIDDLESEX )

I, Wayne Sidor, being duly sworn, depose and say that I am the Advertising Clerk of the Publisher of THE WALL STREET JOURNAL, a daily national newspaper of general circulation throughout the United States, and that the notice attached to this Affidavit has been regularly published in THE WALL STREET JOURNAL for New York distribution for  
1 insertion(s) on the following date(s): 01/21/2026

ADVERTISER: Covington & Burling LLP

and that the foregoing statements are true and correct to the best of my knowledge.

Sworn to  
before me this  
21st day of  
January 2026

Wayne Sidor

  
Notary Public



