



PUBLIC DISCLOSURE

September 29, 2015

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Chain Bridge Bank, National Association
Charter Number 24755

1445-A Laughlin Avenue McLean, VA 22101

Office of the Comptroller of the Currency

400 7th Street S.W. Washington, DC 20291

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The major factors supporting this rating include:

- The Bank's quarterly average net loan-to-deposit ratio (LTD) is reasonable and meets the standards for satisfactory performance;
- A majority of the loans were originated in the Bank's assessment area;
- The distribution of loans to borrowers of different income levels reflects reasonable dispersion given the demographics of the assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the census tracts of different income levels ;
- The level of qualified community development (CD) services, loans, and investments represents excellent responsiveness to identified community development needs; and
- During the evaluation period there were no complaints related to the Bank's performance in meeting the credit needs of the AA.

Scope of Examination

Chain Bridge Bank, National Association (CBB) was evaluated under the Intermediate Small Bank examination procedures, as the Bank had assets of at least \$305 million as of December 31 of both of the previous two calendar years, and less than \$1.2 billion as of either of the prior two calendar years. These procedures evaluate the bank's performance based upon a Lending Test and a Community Development Test. The Lending Test considers the institution's performance pursuant to the following criteria: LTD Analysis; Assessment Area Concentration; Geographic Distribution; Borrower Profile; and Response to CRA Complaints. The Community Development Test evaluates the Bank's responsiveness to CD needs in its AA through CD lending, qualified investments, and community development services. The evaluation period for the Lending Test covers the Bank's performance from January 1, 2013 through June 30, 2015. The evaluation period for the community development test is from August 8, 2011, the date of the last CRA Evaluation, through September 29, 2015.

For the period from January 1, 2013 through December 31, 2013, the Bank's performance was compared to the 2010 U.S. Census Data and the 2004 Metropolitan

profit developers; flexible underwriting and risk capital for needed community facilities; and technical assistance, commercial loans, and investments to small start-up or expanding businesses in low-income targeted areas.

- CBB has invested \$500 thousand in a SBA loan fund called Solomon-Hess. The fund's mission is to promote job creation, retention and improvement in low- or moderate-income areas, or for low- and moderate-income persons employed by small businesses, by creating greater financial liquidity and a lower cost of capital within the Small Business Administration Section 7(a) loans.

Extent to Which the Bank Provides Community Development Services

During the review period, CBB employees provided 210 service hours in various capacities for community development organizations, by participating in 30 different community development services. The community development services offered focused on education, affordable housing, economic development, fund raising, and other community services that aided low- and moderate-income geographies and low- and moderate-income individuals.

The following is a partial list of organizations that CBB supported during the evaluation period:

- Everyone's Home Matters (Housing and Community Services of Northern VA)
- Washington Area Community Investment Fund (WACIF)
- Arlington Food Assistance Center (AFAC)
- Virginia Small Business Partnership
- Small Business Commission Fairfax
- Hispanic Committee of VA
- Business Finance Group

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any AA by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

There was no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs of the Bank's combined assessment area.