



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

February 8, 2006

**Community Development Investment Letter #2006-1
March 2007**

Ms. Julia T. Brown
Vice President CRA Officer
Charles Schwab Bank, N.A.
101 Montgomery Street, 10-275
San Francisco, California 94104

Dear Ms. Brown:

This opinion is in response to your letter that we received on January 30, 2006. Charles Schwab Bank, N.A. (the “Bank”) requests prior approval from the Office of the Comptroller of the Currency (the “OCC”) to make an investment of \$3,000,000 in the Solomon Hess SBA Loan Fund, Limited Liability Company (the “Fund”), under 12 USC § 24 (Eleventh)(the “Statute”), and 12 CFR Part 24 (the “Regulation”) concerning national bank community and economic development entities, community development projects, and other public welfare investments.

The Bank indicates that its investment in the Fund is a “qualified investment” under 12 CFR 25.23 for purposes of the Community Reinvestment Act. The Fund will make loans to small businesses in depressed economic areas for the purpose of supporting permanent job creation, retention or the improvement of the economic condition of low- and moderate-income individuals in Nevada. Based on the information provided by the Bank, we believe the investment complies with the public welfare and the investment limits requirements of 12 CFR 24.3 and 24.4 and is approved.

The Bank attests that the investment in the Fund complies with the public welfare and the investment limit requirements of §§ 24.3 and 24.4 of the Regulation. The Bank indicates that the aggregate amount of its outstanding investments and commitments under the Regulation, including the investment in the Fund, is [] percent of its capital and surplus. If requested by the OCC, the Bank will provide reports concerning its Part 24 investment.

The response set forth in this letter is based on information and representations provided to us by the Bank. Any change in the nature, amount, or purpose of the Bank's investment could result in a different response being rendered concerning the conformance of the Bank's investment with the Statute and the Regulation.

This response regarding the Bank's Part 24 investment and the activities, and communications by OCC employees in connection with this filing, do not constitute a contract, express or implied, or any other obligation upon the OCC, the U.S., or any agency or entity of the U.S., or an officer or employee of the U.S. This response does not affect the ability of the OCC to exercise its supervisory, regulatory, and examination authorities under applicable laws and regulations. The foregoing may not be waived or modified by any employee or agent of the OCC or the U.S.

If you have questions regarding this letter, please feel free to contact me at (202) 874-4930. You may also access general information about the national bank community development investment authority under Part 24 on <http://www.occ.treas.gov/cdd/pt24toppage.htm>.

Sincerely,

/s/

Barry R. Wides
Deputy Comptroller
Community Affairs