

APPLICATION
to the
OFFICE OF THE COMPTROLLER OF THE CURRENCY
to organize
BRIDGE NATIONAL TRUST BANK.

October 14, 2025

October 14, 2025

VIA ELECTRONIC DELIVERY

Mr. Stephen Lybarger
Senior Deputy Comptroller for Chartering, Organization and Structure
Office of the Comptroller of the Currency
400 7th Street, S.W.
Washington, DC 20219

Re: Charter Application and Confidential Treatment Request for Bridge National
Trust Bank

Dear Mr. Lybarger:

On behalf of the organizers of Bridge National Trust Bank ("**BNTB**"), and Stripe, Inc., ("**Stripe**") as the sponsoring organization of BNTB, we respectfully submit an application to the Office of the Comptroller of the Currency (the "**OCC**") to charter BNTB as a *de novo* national trust bank. The application materials include a main application, a public exhibits volume, and a confidential exhibits volume.

The information contained in the confidential exhibits volume (the "**Confidential Information**") includes information regarding the business strategies and plans of Stripe and BNTB, and other information of a similar nature, the public disclosure of which would result in substantial competitive harm to Stripe and BNTB. The Confidential Information also includes non-public personal information, the public disclosure of which would constitute an unwarranted invasion of personal privacy. Accordingly, confidential treatment is respectfully requested with respect to the Confidential Information pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (the "**FOIA**") and the OCC's regulations implementing the FOIA, 12 C.F.R. Part 4, Subpart B. The Confidential Information may also be exempt from disclosure under other provisions of law.

We also request that, if the OCC should make a preliminary determination not to comply with the request for confidential treatment, Stripe and BNTB be given notice thereof with ample time to permit it to make an appropriate submission as to why such information should be preserved in confidence. If the Confidential Information is the subject of a FOIA request or a request or demand for disclosure by any governmental agency, Congressional office or committee, or court or grand jury, we request, pursuant to the OCC's regulations, that you notify Stripe and BNTB prior to making such disclosure. We further ask that Stripe and BNTB be furnished with a copy of all written materials pertaining to such request and that Stripe and BNTB be given sufficient advance notice of any intended release so that Stripe and BNTB may, if deemed necessary or appropriate, pursue any available remedies.

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PAUL HASTINGS

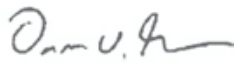
Mr. Stephen Lybarger
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We sincerely appreciate your time and consideration with respect to BNTB's charter application. Should you have any questions or require any additional information, please do not hesitate to contact Josh Boehm at (212) 318-6033 or joshboehm@paulhastings.com or Dana Syracuse at (212) 318-6034 or danasyracuse@paulhastings.com.

Sincerely,



Joshua L. Boehm
of PAUL HASTINGS LLP



Dana V. Syracuse
of PAUL HASTINGS LLP

cc: Sebastian Astrada, Office of the Comptroller of the Currency
Eric Weingarten, Bridge Ventures LLC
Paris Cribben, Bridge Ventures LLC

BRIDGE NATIONAL TRUST BANK

INTERAGENCY CHARTER APPLICATION

Public Volume

Volume 1

(1 of 3 Volumes)

Contact Person

Paris Cribben
General Counsel
Bridge Ventures LLC – a Stripe, Inc. company
112 Gull Drive
South San Francisco, CA 94080
paris@bridge.xyz

with a copy to:

Josh Boehm & Dana Syracuse
Paul Hastings LLP
200 Park Avenue
New York, NY 10166
joshboehm@paulhastings.com
danasyracuse@paulhastings.com

INTERAGENCY CHARTER AND FEDERAL DEPOSIT INSURANCE APPLICATION

(Check all appropriate boxes.)

Type of Charter

- ☒ National Bank
- ☐ State Bank
- ☐ Federal Savings Bank or Association
- ☐ State Savings Association
- ☐ Other

Chartering Agency

- ☒ Comptroller of the Currency
- ☐ State

Special Focus

- ☐ Community Development
- ☐ Cash Management
- ☒ Trust
- ☐ Bankers' Bank
- ☐ Credit Card ☐ Non-CEBA ☐ CEBA
- ☐ Other

Type of Insurance Application

- ☒ De Novo
- ☐ Operating Noninsured Institution
- ☐ Other

Federal Reserve Status

- ☒ Member Bank
- ☐ Nonmember Bank

For OCC: ☒ Standard ☐ Expedited

Proposed Depository Institution (institution)

Name

Street	Bridge National Trust Bank	City	State	Zip
	28 Liberty Street	New York	NY	10005

Holding Company Identifying Information

Name

Street	Stripe, Inc.	City	State	Zip
	112 Gull Drive	South San Francisco	CA	94080

Contact Person

Paris Cribben
General Counsel
Bridge Ventures LLC – a Stripe, Inc. company

with a copy to: Josh Boehm &
Dana Syracuse,
Paul Hastings LLP

Name

112 Gull Drive	200 Park Avenue
Street	
South San Francisco, CA 94080	New York, NY 10166
City, State Zip	
Email: paris@bridge.xyz	Email: joshboehm@paulhastings.com danasyracuse@paulhastings.com

Bridge National Trust Bank

Interagency Charter Application

Bridge National Trust Bank

Charter Application List of Exhibits

PUBLIC EXHIBIT	Vol 1
Public Notice	A
Residency Waiver Requests	B

CONFIDENTIAL EXHIBITS	Vol 2
Management Interlock Application – Sara Wardell-Smith	C
Business Plan	D
Corporate Background and Financial Report (with attachments)	E
Proposed form of Articles of Association	F
Proposed form of Bylaws	G
Proposed form of Stock Certificate	H
Contact Person Designation	I
Oath of Directors	J
Financial Projections	K
Stock Benefit Plan	L
Form Intercompany Services Agreement	M
Stripe, Inc. – Excerpt of Organization Chart	N

CONFIDENTIAL IBFR EXHIBITS	Vol 3
<i>IBFR, Resumes, and Related Materials</i>	
Zachary Abrams	O-1
John Collison	O-2
Paris Cribben	O-3
Michael Lempres	O-4
Sara Wardell-Smith	O-5
Eric Weingarten	O-6

INTERAGENCY CHARTER AND FEDERAL DEPOSIT INSURANCE APPLICATION

1. Overview

- (a) Provide a brief overview of the application. The overview should describe the institution's business and any special market niche, including the products, market, services, and any nontraditional activities.

Stripe, Inc. (as an enterprise, "**Stripe**"), as sponsor and acting through the named organizers, proposes to organize Bridge National Trust Bank ("**BNTB**"). BNTB will be a *de novo* national trust bank chartered by the Office of the Comptroller of the Currency (the "**OCC**") pursuant to Sections 21, 24(Seventh) and 92a of the National Bank Act, as set forth in this application (this "**Application**"). BNTB will be headquartered in New York, New York and will be a wholly owned subsidiary of Bridge Ventures LLC ("**BVL**"), a direct subsidiary of Stripe, Inc.

BVL is the top parent company of the Bridge family of companies (together, "**Bridge**"), with the ultimate parent being Stripe, Inc. Bridge has developed a platform that can offer the technology needed to adopt fiat currency-denominated stablecoins, including conversion from/to corresponding fiat currency, in ordinary commerce (e.g., supply chain, payroll, vendor payments, goods and services purchases) where stablecoins provided payment service providers and their end-users with a faster, cost-efficient, and more secure method of facilitating payments. Since launching, Bridge has—through the use of stablecoins—offered its cross-border payments service with faster and cheaper access than traditional alternatives, enabled governments and aid agencies to distribute funds more efficiently, and given more true economic choice to customers globally, enabling them to easily save and spend U.S. dollars and Euros.

In early 2025, Bridge was acquired by Stripe. Stripe enables merchants and developers to build customer-friendly payment experiences in websites and mobile applications by streamlining many of the complexities that were previously required for merchants to accept payments online. In particular, Stripe's business-to-business payment software links its users' websites and applications to Stripe's payment processing infrastructure through integration of APIs.

Once chartered, BNTB will conduct activities that complement and enhance existing business lines, including custody, stablecoin issuance, management of stablecoin reserves, and related fiduciary services, as described in detail in Section II.C of BNTB's confidential business plan (the "**Confidential Business Plan**"), provided at **Confidential Exhibit D**.

- (b) Describe any issues about the permissibility of the proposal with regard to applicable state or federal laws or regulations. Identify any regulatory waiver requests and provide adequate justification.

This Application is made pursuant to Sections 21 and 24(Seventh) of the National Bank Act ("**NBA**"). These sections of the NBA provide for the formation of national banking associations

“for carrying on the business of banking” upon the approval of the OCC. Pursuant to Section 92a of the NBA, national banks may be authorized to act as “trustee . . . or in any other fiduciary capacity in which State banks, trust companies, or other corporations which come into competition with national banks are permitted to act.” The organizers have not identified issues concerning the permissibility of BNTB or its proposed Confidential Business Plan with regard to applicable state or federal laws or regulations. Except as expressly set forth in this Application, no regulatory waivers are requested in connection with this application.

The proposed activities of BNTB are described in Section II.C of the Confidential Business Plan provided at **Confidential Exhibit D**.

Section 72 of the NBA requires that, absent a waiver from the Comptroller, a majority of the directors must reside:

- 1) within the state in which BNTB is located; or
- 2) within one hundred miles of the location of the office of BNTB for at least one year immediately preceding their election.

BNTB is expected to operate under the direction of five directors, none of whom will reside in New York or within one hundred miles of the proposed location of BNTB. For this reason, the organizers have separately submitted residency waiver requests to the OCC as a public application. This waiver contains the justification for such request. All initial directors are citizens of the United States.

- (c) List and provide a copy of all applications filed in conjunction with this proposal, such as applications for holding company, trust powers, branch offices, service corporations, and other subsidiaries.

As provided in 12 C.F.R. § 5.20(h)(7), the Confidential Business Plan as set forth in **Confidential Exhibit D** establishes the request for BNTB to have full fiduciary powers.

- (d) When available, provide a copy of all public or private offering materials and the proposed form of stock certificate, including any required restrictive legends.

There will not be public or private offering materials. The proposed form of stock certificate is provided at **Confidential Exhibit H**.

- (e) Provide a copy of the proposed articles of association, articles of incorporation, or charter, and proposed bylaws.

Copies of the proposed articles of association and proposed bylaws are provided at **Confidential Exhibits F and G**, respectively.

- (f) Provide a copy of the business plan. The business plan should address, at a minimum, the topics contained in the appropriate regulatory agency's Business Plan Guidelines.

A copy of the Confidential Business Plan is provided at **Confidential Exhibit D**.

2. Management

- (a) Provide a list of the organizers, proposed directors, senior executive officers, and any individual, or group of proposed shareholders acting in concert, that will own or control 10 percent or more of the institution's stock. For each person listed, attach an Interagency Biographical and Financial Report, a fingerprint card, and indicate all positions and offices currently held or to be held with the institution's holding company and its affiliates, if applicable. Include the signed "Oath of Director" for each proposed director. For an FSA filing, provide a RB 20a Certification for each person listed.

The organizers of BNTB are:

- 1) Zachary Abrams
- 2) Paris Cribben
- 3) Michael Lempres
- 4) Sara Wardell-Smith
- 5) Eric Weingarten

BNTB will have a five-member board of directors consisting of the five organizers listed above. Ms. Cribben will chair the board of directors. Mr. Lempres and Ms. Wardell-Smith will be independent directors.

BNTB's sole shareholder will be BVL, a privately held limited liability company located in Berkeley, California and organized in Delaware. BVL's sole member is Stripe, Inc., a privately held corporation located in South San Francisco, California and incorporated in Delaware. An excerpt of the organization chart is provided at **Confidential Exhibit N**.

BNTB's proposed President and Chief Trust Officer will be Ms. Cribben, and its Chief Product Officer will be Eric Weingarten. Other senior executive officers will include a Chief Operating and Deputy Trust Officer (and Vice President), a Chief Financial Officer, a Chief Compliance

Officer (and BSA Compliance Officer), a Chief Risk Officer, a Chief Legal Officer, and a Chief Information Security Officer.

Copies of an Interagency Biographical and Financial Report for each principal shareholder, proposed director and proposed senior executive officer, along with supporting materials where applicable, are provided in the **Confidential IBFR Exhibit O** to this Application or will be provided under separate confidential cover to the OCC.

An Oath of the Bank Director for each proposed director is provided in the **Confidential IBFR Exhibit O** to this Application.

Each of BNTB's proposed directors will own a qualifying equity interest in Stripe, Inc. prior to BNTB commencing operations, as required by Section 72 of the National Bank Act and 12 C.F.R. § 7.2005.

- (b) Describe each proposed director's qualifications and experience to serve and oversee management's implementation of the business plan. Describe the extent, if any, to which directors or major stockholders are or will be involved in the day-to-day management of the institution. Also list the forms of compensation, if any.

Zachary Abrams (Director of BNTB & CEO of Bridge): Mr. Abrams is currently the Chief Executive Officer of Bridge. Mr. Abrams previously served as Chief Product Officer at Brex, Head of Consumer Product at Coinbase, and a General Manager at Square. Before these experiences, Mr. Abrams founded a peer-to-peer payments company, Evenly, which was later acquired by Square. Mr. Abrams received a Bachelor of Arts degree from Duke University. Mr. Abrams will receive shares in Stripe, Inc. as compensation for his service as a director.

Paris Cribben (President and Trust Officer of BNTB, Director, Organizer and Chair): Ms. Cribben is currently General Counsel of Bridge Ventures LLC. Ms. Cribben previously served as General Counsel of Silvergate Bank; as an Advisor for BVNK, a payments company offering fiat and cryptocurrency products & services; as Assistant General Counsel at Orbian, a global supply chain finance organization; and various roles within the Investment Management & Trust group at Union Bank, N.A. including through the merger with Mitsubishi UFJ Financial Group. Ms. Cribben received a JD/MBA from the University of San Francisco School of Law and School of Management and a Bachelor of Arts degree from the University of California, San Diego. Ms. Cribben will receive shares in Stripe, Inc. as compensation for her service as a director.

Michael Lempres (Independent Director of BNTB): Mr. Lempres is an advisor and legal strategist, and sits on the board of various fintech institutions. Mr. Lempres previously served at companies such as Coinbase (as Chief Legal & Risk Officer and Chief Policy Officer), Bitnet Technologies Ltd. (General Counsel, Corporate Secretary & Chief Compliance Officer), and Silvergate Bank (Director, Chair). Before these experiences, Mr. Lempres held various leadership roles in the private and non-profit sectors and the United States Government, including the U.S. Department of Justice. Mr. Lempres received a legal degree from the

University of California, Berkeley and a Bachelor of Arts degree from Dartmouth College. As an independent director, Mr. Lempres will receive a combination of an annual stipend and shares in Stripe, Inc. as compensation for his service on the board.

Sara Wardell-Smith (Independent Director of BNTB): Ms. Wardell-Smith is a board advisor and former fintech executive helping high-growth companies scale globally, navigate regulatory complexity, and drive enterprise adoption of emerging technologies. She previously spent 25 years at Wells Fargo and Visa, where she built and led global payments, FX, and treasury businesses from early stage to billions in revenue. Her expertise spans real-time and cross-border payments, digital assets, stablecoins, and enterprise go-to-market. Ms. Wardell-Smith holds a bachelor's degree in international finance from the University of San Francisco. As an independent director, Ms. Wardell-Smith will receive a combination of an annual stipend and shares in Stripe, Inc. as compensation for her service on the board.

Eric Weingarten (Director & Chief Product Officer of BNTB): Mr. Weingarten is currently the Chief Legal and Compliance Officer of Bridge. Mr. Weingarten previously served as General Counsel at Truework and Head of Product Legal at Coinbase. In addition to those roles, Mr. Weingarten served in legal leadership positions at Tesla and SolarCity. Mr. Weingarten received legal degrees from Georgetown University (LLM) and University of Denver (JD), and a Bachelor of Arts degree from the University of Virginia.

More details regarding BNTB's proposed directors are discussed in Section IV.A.1 of the Confidential Business Plan, set forth at **Confidential Exhibit D**.

Director compensation is also set forth in Section IV.B.4 of the Confidential Business Plan at **Confidential Exhibit D**.

(c) Provide a list of board committees and members.

BNTB will have an Audit Committee consisting of at least three directors.

BNTB will have a Risk Committee consisting of at least three directors.

Details relating to both these committees are provided in Section IV.A.2 of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

(d) Describe any plans to provide ongoing director education or training.

BNTB will develop trainings required for the directors as relevant to or otherwise required for BNTB's operations. Such trainings are described in Section IV.A.3 of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (e) Describe each proposed senior executive officer's duties and responsibilities and qualifications and experience to serve in his/her position. If a person has not yet been selected for a key position, list the criteria that will be required in the selection process. Discuss the proposed terms of employment, including compensation and benefits, and attach a copy of all pertinent documents, including an employment contract or compensation arrangement. Provide the aggregate compensation of all officers.

See Section IV.B.2 of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (f) Describe any potential management interlocking relationships (12 U.S.C. 1467a(h)(2), 3201-3208, or applicable state law) that could occur with the establishment or ownership of the institution. Include a discussion of the permissibility of the interlock with regard to relevant law and regulations or include a request for an exemption.

There is one potential management interlocking relationship with respect to proposed director Sara Wardell-Smith, who serves as a director of another depository institution. For the reasons set forth in **Public Exhibit B**, the organizers have separately submitted a management interlock exemption request to the OCC.

- (g) Describe any potential conflicts of interest.

The organizers are not aware of potential conflicts of interest with respect to BNTB. BNTB will comply with 12 C.F.R. § 9.12.

- (h) Describe any transaction, contract, professional fees, or any other type of business relationship involving the institution, the holding company, and its affiliates (if applicable), and any organizer, director, senior executive officer, shareholder owning or controlling 10 percent or more, and other insiders. Include professional services or goods with respect to organizational expenses and bank premises and fixed asset transactions. (Transactions between affiliates of the holding company that do not involve the institution need not be described).

See Sections II.E and V.A.1.c of the Confidential Business Plan as set forth in **Confidential Exhibit D** for additional details about intercompany agreements.

- 1) State whether the business relationship is made in the ordinary course of business, is made on substantially the same terms as those prevailing at the time

for comparable transactions with non-insiders, and does not present more than the normal risk of such transaction or present other unfavorable features.

*See Sections II.E and V.A.1.c of the Confidential Business Plan as set forth in **Confidential Exhibit D**.*

- 2) Specify those organizers that approved each transaction and whether the transaction was disclosed to proposed directors and prospective shareholders.

The transactions necessary for this application were approved by Stripe, the Sponsoring Organizer and ultimate parent of the proposed NTB. The transactions were also approved by the immediate parent and sole shareholder of the proposed NTB, BVL.

- 3) Provide all relevant documentation, including contracts, independent appraisals, market valuations, and comparisons.

*See Sections II.E and V.A.1.c of the Confidential Business Plan as set forth in **Confidential Exhibit D**.*

- (i) Describe all stock benefit plans of the institution and holding company, including stock options, stock warrants, and other similar stock-based compensation plans, for senior executive officers, organizers, directors, and other insiders.

Stripe's Stock Benefit Plan, as amended, is provided at **Confidential Exhibit L**. BNTB, as a wholly owned subsidiary of BVL, will not have its own stock benefit plan or similar stock-based compensation plan.

Include in the description:

- 1) The duration limits.

*See Section IV.B.4 of the Confidential Business Plan as set forth in **Confidential Exhibit D** and **Confidential Exhibit L**.*

2) The vesting requirements.

See Section IV.B.4 of the Confidential Business Plan as set forth in **Confidential Exhibit D** and **Confidential Exhibit L**.

3) Transferability restrictions.

See Section IV.B.4 of the Confidential Business Plan as set forth in **Confidential Exhibit D** and **Confidential Exhibit L**.

4) Exercise price requirements.

See Section IV.B.4 of the Confidential Business Plan as set forth in **Confidential Exhibit D** and **Confidential Exhibit L**.

5) Rights upon termination.

See Section IV.B.4 of the Confidential Business Plan as set forth in **Confidential Exhibit D** and **Confidential Exhibit L**.

6) Any “exercise of forfeiture” clause.

See Section IV.B.4 of the Confidential Business Plan as set forth in **Confidential Exhibit D** and **Confidential Exhibit L**.

7) Number of shares to be issued or covered by the plans.

See Section IV.B.4 of the Confidential Business Plan as set forth in **Confidential Exhibit D** and **Confidential Exhibit L**.

- 8) Provide a list of participants, allocation of benefits to each participant, and a copy of each proposed plan. (Plans must conform to applicable regulatory guidelines.)

*See Section IV.B.4 of the Confidential Business Plan as set forth in **Confidential Exhibit D**.*

3. Capital

- (a) For each class of stock, provide the number of authorized shares, the number of shares to be issued, par value, voting rights, convertibility features, liquidation rights, and the projected sales price per share. Indicate the amount of net proceeds to be allocated to common stock, paid-in surplus, and other capital segregations.

BNTB will have a single class of voting common stock. Additional information regarding the terms of BNTB's voting common stock may be found in the draft Articles of Association provided in **Confidential Exhibit F**. Additional information regarding the capital structure of BNTB is included in Section VI of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (b) Describe any noncash contributions to capital, and provide supporting documents for assigned values, including an independent evaluation or appraisal.

BNTB will not have any noncash contributions to capital. *See* Section VI.A of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (c) Discuss the adequacy of the proposed capital structure relative to internal and external risks, planned operational and financial assumptions, including technology, branching, and projected organization and operating expenses. Present a thorough justification to support the proposed capital, including any off-balance-sheet activities contemplated. Describe any plans for the payment of dividends.

Section VI.A.4 of the Confidential Business Plan, as set forth in **Confidential Exhibit D**, describes BNTB's proposed capital structure, which was determined after consideration of OCC Bulletin 2007-21.

- (d) List all known subscribers to stock. For organizers, directors, 10 percent shareholders, senior executive officers, and other insiders, include the number of

shares and anticipated investment and the amount of direct and indirect borrowings to finance the investment. Discuss how any debt will be serviced.

All shares in BNTB will be issued to its sole shareholder, BVL.

- (e) List recipients and amounts of any fees, commissions, or other considerations in connection with the sale of stock.

No party will receive any fee, commission, or other consideration in connection with the issuance of BNTB's common stock to BVL.

- (f) Indicate whether the institution plans to file for S Corporation tax status.

BNTB does not plan to file for S Corporation tax status.

4. Convenience and Needs of the Community

NOTE: This information must be consistent with the proposed business plan.

- (a) Market Characteristics

- 1) Define the intended geographical market area(s). Include a map of the market area, pinpointing the location of proposed bank's offices and offices of competing depository institutions.

BNTB will maintain its main office in New York. *See* Section III.B.1 of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- 2) Describe the competitive factors the institution faces in the proposed market and how the institution will address the convenience and needs of that market to maintain its long-term viability.

See Section III.D of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- 3) Discuss the economic environment and the need for the institution in terms of population trends, income, and industry and housing patterns.

See Section III.C of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

(b) Community Reinvestment Act (CRA) Plan¹

NOTE: The CRA Plan must be bound separately.

- 1) Identify the assessment area(s) according to the CRA regulations.²

Not applicable. As a national trust bank, BNTB will not be subject to the CRA. *See* 12 C.F.R. § 25.11(c)(3).

- 2) Summarize the performance context for the institution based on the factors discussed in the CRA regulations.³

Not applicable. As a national trust bank, BNTB will not be subject to the CRA. *See* 12 C.F.R. § 25.11(c)(3).

- 3) Summarize the credit needs of the institution's proposed assessment area(s).

Not applicable. As a national trust bank, BNTB will not be subject to the CRA. *See* 12 C.F.R. § 25.11(c)(3).

- 4) Identify the CRA evaluation test⁴ under which the institution proposes to be assessed.

Not applicable. As a national trust bank, BNTB will not be subject to the CRA. *See* 12 C.F.R. § 25.11(c)(3).

- 5) Discuss the institution's programs, products, and activities that will help meet the existing or anticipated needs of its community(ies) under the applicable

criteria of the CRA regulation, including the needs of low- and moderate-income geographies and individuals.

Not applicable. As a national trust bank, BNTB will not be subject to the CRA. *See* 12 C.F.R. § 25.11(c)(3).

5. Premises and Fixed Assets

- (a) Provide a physical description for permanent premises and discuss whether they will be publicly and handicapped accessible. Indicate the level and type of property insurance to be carried.

BNTB's office will be located at 28 Liberty Street, New York, New York. The office will be within premises currently leased by Stripe. The building is accessible for persons with disabilities and meets regulatory standards in this regard. The office is not publicly accessible. Access to the office will be restricted only to authorized personnel.

Information about insurance is in Section V.A of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (b) If the permanent premises are to be purchased, provide name of seller, purchase price, cost and description of necessary repairs and alterations, and annual depreciation. If the premises are to be constructed, provide the name of the seller, the cost of the land, and the construction costs. Indicate the percentage of the building that will be occupied by the bank. Provide a copy of the appraisal.

Not applicable; BNTB will not purchase or construct its premises.

- (c) If the permanent premises are to be leased, provide name of owner, terms of the lease, and cost and description of leasehold improvements. Provide a copy of the proposed lease when available.

BNTB's office will be within premises currently leased by Stripe. No leasehold improvements are planned. *See* Section II.H of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (d) If temporary quarters are planned, provide a description of interim facility, length of use, lease terms, and other associated commitments and costs.

Not applicable. BNTB will not utilize temporary quarters.

- (e) State whether proposed premises and fixed asset expenditures conform to applicable statutory limitations.

BNTB's proposed premises and fixed asset expenditures conform to applicable statutory limitations.

- (f) Outline the security program that will be developed and implemented, including the security devices.⁵

BNTB's security program is discussed in Section V.A.1.d of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (g) Discuss any significant effect the proposal will have on the quality of the human environment. Include in the discussion changes in air and/or water quality, noise levels, energy consumption, congestion of population, solid waste disposal, or environmental integrity of private land within the meaning of the National Environmental Policy Act, 42 U.S.C. 4321, et seq.

BNTB's operations will not materially change air or water quality, noise levels, energy consumption, population congestion, waste disposal, or environmental quality of any private land holding within the meaning of the National Environmental Protection Act. Thus, the proposed formation of BNTB and its anticipated activities are not expected to have a detrimental impact on the quality of the human environment.

- (h) Describe any plan to establish branches or relocate the main office within the first three years. Any acquisition or operating expenses should be reflected in the financial projections.

Bridge has no plans to move BNTB's office or establish branches in the first three years.

- (i) Indicate if the establishment of the proposed main office and/or any branch site may affect any district, site, building, structure, or object listed in, or eligible for listing

in, the National Register of Historic Places pursuant to the National Historic Preservation Act, 16 U.S.C. 470f. (See the Advisory Council on Historic Preservation at www.achp.gov for the Act and implementing regulations.) Specify how such determination was made:

- 1) Consultation with the State Historic Preservation Officer (SHPO) and/or Tribal Historic Preservation Officer (THPO) (when tribal lands or historic properties of significance to a tribe are involved).
- 2) Reviewed National Register of Historic Places (see www.nps.gov/nr).
- 3) Applied National Register criteria to unlisted properties.⁶
- 4) Reviewed historical records.
- 5) Contact with preservation organizations.
- 6) Other (describe).

Based upon review of the National Register of Historic Places (the “**Register**”), 28 Liberty Street (a/k/a One Chase Manhattan Plaza) is not designated as a landmark on the Register.

As appropriate, provide a copy of any documentation of consultation with the SHPO and/or THPO. *You are reminded that if a historic property may be affected, no site preparation, demolition, alterations, construction or renovation may occur without the appropriate regulatory agency’s authorization.*

6. Information Systems

- (a) State whether the institution plans to market its products and services (the ability to do transactions or account maintenance) via electronic means. If yes, specifically state the products and services that will be offered via electronic banking or the Internet.

BNTB’s services will be offered electronically. *See* Section II.C of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (b) Outline the proposed or existing information systems architecture and any proposed changes or upgrades. The information should describe how: (1) the information system will work within existing technology; (2) the information system is suitable to the type of business in which the institution will engage; (3) the security hardware, software, and procedures will be sufficient to protect the institution from

unauthorized tampering or access; and (4) the organizers and directors will allocate sufficient resources to the entire technology plan.

See Sections V.A.1.d and V.A.3.b of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (c) Provide lists or descriptions of the primary systems and flowcharts of the general processes related to the products and services. The level of detail in these system descriptions should be sufficient to enable verification of the cost projections in the *pro formas*.

See Sections V.A.3.a and Section V.F of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (d) Estimate the start-up budget for the information systems related to the products and services and the expected annual operating and maintenance costs (including telecommunications, hardware, software, and personnel).

BNTB will use Bridge’s existing information systems, and as such, there is no estimated start-up budget associated with these systems. Expected annual costs to BNTB in connection with its use of these systems are set forth in the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (e) Describe the physical and logical components of security. Describe the security system and discuss the technologies used and key elements for the security controls, internal controls, and audit procedures. Discuss the types of independent testing⁷ the institution will conduct to ensure the integrity of the system and its controls.

See Section V.A.3.a-b of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (f) Describe the information security program that will be in place to comply with the “Interagency Guidelines Establishing Standards for Safeguarding Customer Information.”⁸

See Sections V.A.1.e and V.A.3.b of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

7. Other Information

- (a) List activities and functions, including data processing, that will be outsourced to third parties, identifying the parties and noting any affiliations. Describe all terms and conditions of the vendor management activities and provide a copy of the proposed agreement when available. Describe the due diligence conducted and the planned oversight and management program of the vendors' or service providers' relationships (for general vendor management guidance, see the Appendix of the FFIEC's guidance, Risk Management of Outsourced Technology Services).

*See Section V.F of the Confidential Business Plan as set forth in **Confidential Exhibit D.***

- (b) List all planned expenses related to the organization of the institution and include the name of recipient, type of professional service or goods, and amount. Describe how organization expenses will be paid.

BNTB's organizational expenses include fees for legal advisers, consultants, and tax experts. Organizational expenses have been or will be paid by Stripe as the corporate sponsor of BNTB's application. BNTB will not incur or reimburse Stripe for expenses incurred in advance of BNTB's opening, and these organizational expenses are not reflected in the pro forma financial statements filed with the Confidential Business Plan.

- (c) Provide evidence that the institution will obtain sufficient fidelity coverage on its officers and employees to conform with generally accepted banking practices.

*See Section V.A.7 of the Confidential Business Plan as set forth in **Confidential Exhibit D.***

- (d) If applicable, list names and addresses of all correspondent depository institutions that have been established or are planned.

*See Section II.A of the Confidential Business Plan as set forth in **Confidential Exhibit D.***

- (e) Provide a copy of management's policies for loans, investments, liquidity, funds management, interest rate risk, and other relevant policies. Provide a copy of the Bank Secrecy Act program. Contact the appropriate regulatory agencies to discuss the specific timing for submission.

See Sections III.A and V.A.1.a of the Confidential Business Plan as set forth in **Confidential Exhibit D**.

- (f) For Federal Savings Banks or Associations, include information addressing the proposed institution's compliance with qualified thrift lender requirements.

Not applicable.

- (g) If the institution is, or will be, affiliated with a company engaged in insurance activities that are subject to supervision by a state insurance regulator, provide:

- 1) The name of insurance company.

Not applicable.

- 2) A description of the insurance activity that the company is engaged in and has plans to conduct.

Not applicable.

- 3) A list of each state and the lines of business in that state in which the company holds, or will hold, an insurance license. Indicate the state where the company holds a resident license or charter, as applicable.

Not applicable.

Endnotes

¹ See applicable state requirements.

² See 12 C.F.R. 25.41, 345.41, 195.41.

³ See 12 C.F.R. 25.21(b), 345.21(b), 195.21.

⁴ See 12 C.F.R. 25.21(a), 345.21(a), 195.21.

⁵ See 12 C.F.R. 21, 326, 168.

⁶ See 36 C.F.R. 60.4.

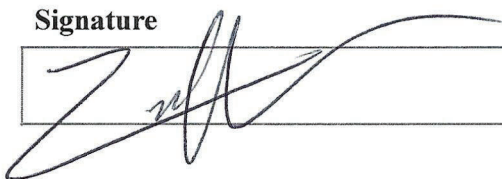
⁷ Independent tests should cover general and environmental controls as well as audit, monitoring, and balancing controls. Independent testing will provide an objective opinion on the adequacy of these controls.

⁸ See 15 U.S.C. 6801, 6805(b); 12 C.F.R. 30; 308 and 364; 168 and 170.

OCC CERTIFICATION

We, the organizers, certify that the information contained in this application has been examined carefully and is true, correct, and complete, and is current as of the date of this submission. We also certify that any misrepresentations or omissions of material facts with respect to this application, any attachments to it, and any other documents or information provided in connection with the application for the organization of the proposed financial institution and federal deposit insurance may be grounds for denial or revocation of the charter and/or insurance, or grounds for an objection to the undersigned as proposed director(s) or officer(s) of the proposed financial institution, and may subject the undersigned to other legal sanctions, including the criminal sanctions provided for in 18 U.S.C. 1001, 1007, and 1014. We request that examiners be assigned to make any investigations necessary.

We acknowledge that approval of this application is in the discretion of the appropriate federal banking agency or agencies. Actions or communications, whether oral, written, or electronic, by an agency or its employees in connection with this filing, including approval of the application if granted, do not constitute a contract, either express or implied, or any other obligation binding upon the agency, other federal banking agencies, the United States, any other agency or entity of the United States, or any officer or employee of the United States. Such actions or communications will not affect the ability of any federal banking agency to exercise its supervisory, regulatory, or examination powers under applicable law and regulations. We further acknowledge that the foregoing may not be waived or modified by any employee or agent of a federal banking agency or of the United States.

Signature	Date	Typed Name
	10/6/25	Zachary Abrams

OCC CERTIFICATION

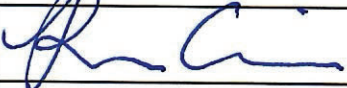
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Signature

Date

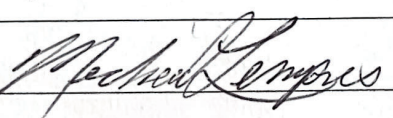
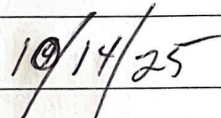
Typed Name

	10/10/2025	Paris Cribben
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OCC CERTIFICATION

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Signature	Date	Typed Name
		Michael Lempres

OCC CERTIFICATION

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Signature

Date

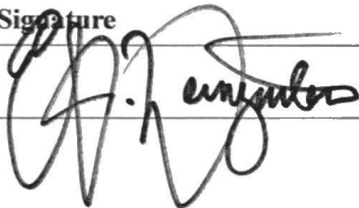
Typed Name

	10/3/2025	Sara Wardell-Smith
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OCC CERTIFICATION

We, the organizers, certify that the information contained in this application has been examined carefully and is true, correct, and complete, and is current as of the date of this submission. We also certify that any misrepresentations or omissions of material facts with respect to this application, any attachments to it, and any other documents or information provided in connection with the application for the organization of the proposed financial institution and federal deposit insurance may be grounds for denial or revocation of the charter and/or insurance, or grounds for an objection to the undersigned as proposed director(s) or officer(s) of the proposed financial institution, and may subject the undersigned to other legal sanctions, including the criminal sanctions provided for in 18 U.S.C. 1001, 1007, and 1014. We request that examiners be assigned to make any investigations necessary.

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Signature	Date	Typed Name
	10/10/2025	Eric Weingarten

Public Exhibits

Public Exhibit A

Public Notice

An Application to Organize a National Trust Bank
Has Been Filed with the Office of the Comptroller of the Currency

The organizers, identified below, intending to organize and operate a national trust bank according to the provisions of the National Bank Act, as amended, submitted an application to the Office of the Comptroller of the Currency for permission to organize a national trust bank, and propose as follows:

1. That the national trust bank will have the following title: Bridge National Trust Bank.
2. That the main office of the national trust bank will be located at 28 Liberty Street, New York, New York 10005.

The organizers and sponsoring organization of Bridge National Trust Bank are:

Zachary Abrams
Paris Cribben
Michael Lempres
Sara Wardell-Smith
Eric Weingarten

Stripe, Inc., 112 Gull Drive, South San Francisco, California 94080.

Any person desiring to comment on this application may do so by submitting written comments within 30 days following the date of publication of this notice to Sebastian Astrada, Director for Licensing, 400 7th St., SW, Washington, DC, or by emailing LicensingPublicComments@occ.treas.gov. A person who wishes to view the public file should submit a request to Sebastian Astrada, Director for Licensing, 400 7th St., SW, Washington, DC 20219 or by emailing Licensing@occ.treas.gov. The public may find information regarding this application, including the date of the end of the public comment period, in the OCC Weekly Bulletin at www.occ.gov.

Public Exhibit B

Residency Waiver

Residency Waiver Request

Applicant

Name	Bridge National Trust Bank	Charter Number	TBD
Street Address	28 Liberty Street		
City	New York	County	New York
		State	NY
		Zip Code	10005

Parent Company Identifying Information (if applicable):

Name	Bridge Ventures LLC
Street Address	2120 University Avenue, Suite 213
City	Berkeley
	State
	CA
	Zip Code
	94704

Contact Person:

Name	Paris Cribben	Title	General Counsel for Bridge Ventures LLC
Employer	Stripe, Inc.		
Street Address	112 Gull Drive		
City	South San Francisco	State	CA
		Zip Code	94080
Phone No.		Fax No.	
E-mail	paris@bridge.xyz		

1. Overview

Include the following information:

~~For individual waivers:~~

- ~~• Name of individual seeking a residency waiver.~~
- ~~• The biographical portion only of the Interagency Biographical and Financial Report.~~

For multiple waivers:

If seeking multiple waivers of the residency requirement of 12 USC 72, so that a majority of the bank's directors will not be required to satisfy the residency requirement, indicate the number of board of directors who meet the residency requirements and number of directors who do not.

Five of the five identified and proposed directors (Zachary Abrams, Paris Cribben, Michael Lempres, Sara Wardell-Smith, and Eric Weingarten) for the proposed Bridge National Trust Bank (“**BNTB**”) will not meet the residency requirement. None of the five identified directors will meet the residency requirement.

- Zachary Abrams is a resident of California.

- Paris Cribben is a resident of California.
- Michael Lempres is a resident of California.
- Sara Wardell-Smith is a resident of California.
- Eric Weingarten is a resident of California.

While BNTB will be physically located in New York, New York, each director will, through electronic means, have ready access to bank documents and management reports in order to fulfill their duties to the trust bank. Each proposed director was selected for their respective business acumen and each director's respective skills will provide for oversight of BNTB's operations.

For all waivers:

Upon election to the board of directors and with the approval of this request, indicate the number of directors who reside in the state(s), territory, or district in which the bank has its main office or branches, or within 100 miles of the national bank's main office for at least one year immediately preceding their election, and the number of who do not.

Five of the directors are not residents of New York and will not reside within 100 miles of the national trust bank's main office for at least one year immediately preceding their election.

Include a discussion of the proposed director's specific qualifications and experience, how (*he, she, they*) will carry out (*his, her, their*) duties and responsibilities effectively to ensure that the bank is meeting its operating goals, and how this waiver will support the safety and soundness of the bank.

The organizers have concluded that the board of directors of BNTB can provide effective oversight of the trust bank's activities without needing to be physically working at BNTB's offices in New York, New York. As detailed in Section II.C of the confidential business plan for BNTB, the proposed business for BNTB is not a physical operation requiring in-person supervision of its operations. Meetings of the board of directors will be held in accordance with BNTB's bylaws, either in-person or electronically.

Each of the proposed directors was selected because he or she brings unique experiences that separates them from other potential candidates for directors of BNTB. Because Mr. Abrams, Ms. Cribben, and Mr. Weingarten currently serve in executive-level roles at Bridge, they are intimately familiar with Bridge's business, operations, and strategy. This will enhance the BNTB board's ability to oversee BNTB efficiently and effectively as a new regulated subsidiary within the Bridge family of companies.

Each has served in various relevant positions prior to joining Bridge, including in the banking system, which will benefit BNTB by ensuring it is overseen by directors with significant familiarity to operating a financial institution in a regulated environment. For example, Ms. Cribben, who will chair the board of directors of BNTB and serve as BNTB's president, is the General Counsel of Bridge and previously served as the General Counsel of Silvergate Bank.

The proposed independent directors of BNTB also bring extensive experience in regulated banking and financial services. As a proposed independent director of BNTB, Ms. Wardell-Smith has served for about three years as an independent director for Axos Financial, Inc., a savings and loan holding company, and its subsidiary Axos Bank, a savings association. Ms. Wardell-Smith is also a director for several other companies in the financial services sector including R&T Deposit Solutions, C1Fund Inc., and Figure Certificate Company. The other proposed independent director, Mr. Lempres, similarly brings extensive experience in regulated companies, including serving as director for Coinbase Custody & Trust Company, LLC (a New York limited purpose trust company), Bitstamp USA, Inc., Revolut US, Inc., and Silvergate Bank.

Each of the five individuals requiring a waiver of residency are highly qualified candidates who maintain the requisite experience to oversee the proposed business of BNTB.

2. Other information

The applicant certifies it is aware of the citizenship and stock ownership requirements of the persons nominated to serve as directors on its board and will review their qualifications to ensure compliance with those requirements in 12 USC 72.

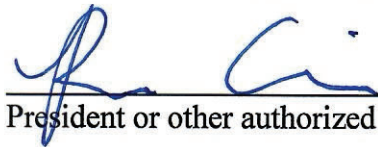
All five identified directors are citizens of the United States. Each director will have at least \$1,000 in qualifying equity interest in Stripe, Inc., which will be ultimate parent company of BNTB.

OCC CERTIFICATION

I certify that the bank's board of directors, shareholders or a designated official has authorized the filing of this application. I certify that the information contained in this application has been examined carefully and is true, correct, complete and current as of the date of this submission. Additionally, I agree to notify the OCC if the facts described in the filing materially change prior to receiving a decision or at any time prior to consummation of the action contemplated herein.

I acknowledge that any misrepresentation or omission of a material fact with respect to this application, any attachments to it, and any other documents or information provided in connection with this application may be grounds for denial of the application or revocation of its approval, and may subject the undersigned to legal sanctions, including the criminal sanctions provided for in Title 18 of the United States Code.

I acknowledge that the approval of this application is in the discretion of the OCC. The activities and communications by OCC employees in connection with the filing, including approval of the application if granted, do not constitute a contract, express or implied, or any other obligation binding upon the OCC, the United States, any agency or entity of the United States, or any officer or employee of the United States, and do not affect the ability of the OCC to exercise its supervisory, regulatory and examination authorities under applicable law and regulations. I further acknowledge that the foregoing may not be waived or modified by any employee or agent of the OCC or the United States.



President or other authorized officer

Paris Cribben

Typed Name

Organizer

Title

Stripe, Inc.

Employer