



BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
WASHINGTON, DC 20551

April 1, 2015

Scott Akins, Esq.
Freestone Capital Management, LLC
701 Fifth Avenue, 74th Floor
Seattle, Washington 98104

Dear Mr. Akins:

This letter responds to your request dated March 2, 2015, on behalf of Freestone Capital Management, LLC, Seattle, Washington, and certain related entities (collectively, “Freestone”)¹ for relief from commitments that Freestone made to the Board of Governors of the Federal Reserve System (“Board”) in connection with the purchase of 14.1 percent of Cordia Bancorp, Inc. (“Cordia”), the parent of Bank of Virginia (“Bank”), both of Midlothian, Virginia. The requested relief would relieve Freestone from commitments that the Board relied on in determining that Freestone would not be able to exercise a controlling influence over Cordia for purposes of the Bank Holding Company Act of 1956, as amended.²

¹ Freestone includes Old River Trust; Brighton Street, LLC; Freestone Capital Holdings, LLC; Freestone Capital Management, LLC; Freestone Investments, LLC; and Freestone Advantage Partners, LP. At the time of the capital raise, Journey Partners, LLC; Reunion Partners, LLC; Sienna Management, LLC; The Sienna Group, LLC; and Sienna Financial Services, LLC (collectively, “Sienna”) were affiliated with Freestone and joined the commitments that Freestone provided to the Board. In November 2012, Sienna disposed of all of its direct and indirect ownership interests in Freestone. Sienna has not requested relief from the commitments.

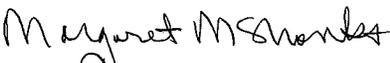
² 12 U.S.C. § 1841 *et seq.*

Freestone acquired 14.1 percent of Cordia's voting shares in 2010. In connection with its investment, Freestone was permitted to have a nonvoting observer on Cordia's board.

Freestone sold all of its Cordia shares through a series of transactions between August 2013 and March 2014. Freestone does not have the right to appoint a director or nonvoting observer to the board of directors of Cordia. Further, there are no existing or contemplated business relationships between Freestone and Cordia or any of its subsidiaries, including Bank. Freestone does not have any formal or informal agreements with Cordia or its subsidiaries relating to the management or policies of Cordia or its subsidiaries. In addition, Freestone does not have any attributed interests in Cordia or ability to influence Cordia through any relationships with other shareholders of Cordia. Freestone has provided a written representation that it would not exercise or attempt to exercise a controlling influence over the management or policies of Cordia.

Based on all the facts of record, the Director of the Division of Banking Supervision and Regulation, acting pursuant to authority delegated by the Board under section 265.7(a)(2) of the Board's Rules Regarding Delegation of Authority (12 CFR 265.7(a)(2)), and after consulting with the General Counsel, has approved Freestone's request for relief from the commitments it provided in connection with its investment in Cordia. This action is based on the representations and commitments set forth in your correspondence related to your request, including the representations discussed above. Any change in the facts presented could result in a different conclusion and should be reported to Board staff immediately. This determination should not be construed as granting relief from any other conditions or commitments to which Freestone may be subject.

Sincerely yours,


Margaret McCloskey Shanks
Deputy Secretary of the Board

cc: Adam M. Drimer, Vice President
Federal Reserve Bank of Richmond