

Smart Biz Bank, N.A.

**COMMUNITY REINVESTMENT ACT
STRATEGIC PLAN**

April 1, 2026- March 31, 2029

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SECTION I. INTRODUCTION

A. Executive Summary

SmartBiz Bank, National Association (“the Bank”), is submitting a proposed three-year Community Reinvestment Act (“CRA”) Strategic Plan to the Office of the Comptroller of the Currency (“OCC”). This Strategic Plan will enable the Bank to tailor its goals and objectives to the Bank’s unique strategy, operational focus, product offerings, capacity, and constraints.

Throughout this Strategic Plan period, the Bank is planning to provide Community Development loans and investments totaling more than \$19 million in order to achieve an Outstanding rating. This target is designed to be proportional to the Bank's projected average total assets over the term of this plan.

The Chief Compliance Officer has been designated by the Bank as the CRA Officer to lead the program, which is supported by all executives of the Bank, with an objective of achieving an Outstanding performance rating. All Bank employees are encouraged to engage in community outreach, financial education, and other volunteering opportunities.

Relevant across its measurable goals, the Bank's CRA impact themes were developed with input from community organizations, and include small business growth, community investment and community development activities. Additional funding and volunteerism may also be provided in response to disasters and other emergencies. The Bank looks forward to deepening existing relationships with local organizations, and developing new ones, to help address these needs. This Strategic Plan outlines in detail the Bank’s planned approach to its CRA program, including performance geographies, performance context, needs assessment, plan focus, and measurable goals.

B. SmartBiz Bank

SmartBiz Bank, National Association is a national chartered bank, regulated by the OCC that is the result of the 2025 acquisition by BillFloat, Inc. dba SmartBiz Loans (“SmartBiz”) of Illinois based Centrust Bank, National Association (“Centrust”) and its holding company United Community Bancshares, Inc. The Bank’s long-term vision is to become a leading national small business bank by incorporating and carrying forward the innovations and network developed by SmartBiz while retaining and continuing to grow the banking business of legacy Centrust Bank. The combined entities are positioned to better serve more small and medium business (“SMB”) customers. At the same time, the Bank will be better positioned to serve its community by enhancing its technological and risk management capabilities and strengthening its financial position.

The Bank will continue to serve existing customers and grow banking business in the Centrust Footprint without material modification to products and services. The Bank will offer a full suite of banking services, including loans, deposits, and payment services, which they will continue to access through the Bank's full-service office in Northbrook, Illinois. Over time, the Bank plans to complement these services with enhanced digital capabilities to provide customers with more convenient access to banking services.

The Bank will also integrate the platform and resources of SmartBiz to provide banking services to SMBs nationally. It will continue to enhance the technology and processes previously developed by SmartBiz, bringing access to capital to underserved segments and offering these customers a suite of lending and deposit products.

C. SmartBiz

SmartBiz was founded in 2009, and its mission was to transform small business lending and equip small businesses in the United States with reliable access to capital. Many of these small businesses that SmartBiz has historically served are women, minorities, and/or veterans that face challenges securing capital and finding the best solutions to meet their financial needs. Financial institutions find it difficult to efficiently originate small business loans (i.e., loans under \$500,000). SmartBiz addressed these challenges by providing a streamlined, online loan application process; applying analytics and technology to record, store and analyze application and performance data to improve lending decisions; providing workflow software to enable efficient loan origination processing; and connecting SMBs with banks. This approach has provided a vital lifeline to SMBs, who have so far received over \$9 billion in SMB loans facilitated by SmartBiz and issued by SmartBiz Partner Banks who have outsourced loan underwriting, processing, and customer service to SmartBiz. Most Partner Banks also utilized the SmartBiz marketplace for customer acquisition. Partner Banks originate and service the loans that SmartBiz processes for them.

SmartBiz and Centrust Bank entered a purchase agreement in June 2023 and the acquisition received regulatory approval from the OCC on February 17, 2025 and the Federal Reserve on February 25, 2025

D. Centrust Bank

Centrust was a \$146 million national bank located in Northbrook, Illinois, and wholly owned by its Holding Company, United Community Bancshares, Inc. The bank had one branch located in an upper-income census tract in Northbrook, IL, a northwest suburb of Chicago, and one ATM at the branch. The bank was primarily a business and consumer lender in the past; however, after senior management changes and a change in the Board of Directors' strategy, the bank became

primarily a commercial lender. As of June 30, 2024, loans and leases totaled \$101.9 million, representing 69.7 percent of total assets. The commercial loan portfolio totaled \$89.0 million and represented 86.4 percent of the total loan portfolio. The commercial loan portfolio consisted of \$27.9 million in commercial and industrial loans and \$61.1 million in commercial real estate loans. The residential loan portfolio totaled \$10.6 million; consumer loans make up less than 1 percent of the total portfolio. Tier 1 capital was \$20.3 million as of June 30, 2024.

The bank's local market is extremely competitive, as reflected by the Federal Deposit Insurance Company ("FDIC") deposit market share report as of June 30, 2023. There are 100 financial institutions with offices inside the bank's AA with deposits totaling \$416 billion. The bank ranked 78th with \$121.3 million in deposits or 0.03 percent of market share. It is important to note that the deposit market share report does not include institutions not insured by the FDIC, such as local credit unions, that place additional pressure on the bank to capture deposit market share.

Centrust received a "Satisfactory" rating at the last CRA evaluation dated June 3, 2024. OCC examiners determined that Centrust exhibited a good record of meeting the credit needs of its assessment area ("AA"), including low- and moderate-income individuals and areas consistent with its resources and capabilities. Centrust has historically been evaluated as a small bank under the Small Bank CRA Examination procedures. Accordingly, they do not have a history of reporting for CRA consideration any Community Development loans, investments, grants, or Community Development services as these activities are not required under a Small Bank CRA Examination.

SECTION II. COMMITMENT TO CRA

A. Smartbiz Bank CRA Efforts

As a federally insured depository institution, the Bank is subject to the CRA, which requires banks to identify and help meet the credit needs of its entire community, including low- to moderate-income ("LMI") individuals and geography.

B. CRA Governance

The Bank maintains a robust governance structure to oversee management and ensure it operates in accordance with laws and regulations, including the CRA. The Board has delegated oversight for the CRA program to the Compliance Subcommittee of the Audit & Risk Committee ("ARC"). The ARC oversees the CRA Officer and the implementation and management of this CRA strategic plan. The CRA Officer reports regularly to the ARC on the implementation of CRA policy, progress towards the Bank's CRA goals, any regulatory exam activity, and approving the Bank's CRA assessment areas. The CRA Officer will report material information to the Board regarding CRA activities and, where appropriate, their recommendations for action.

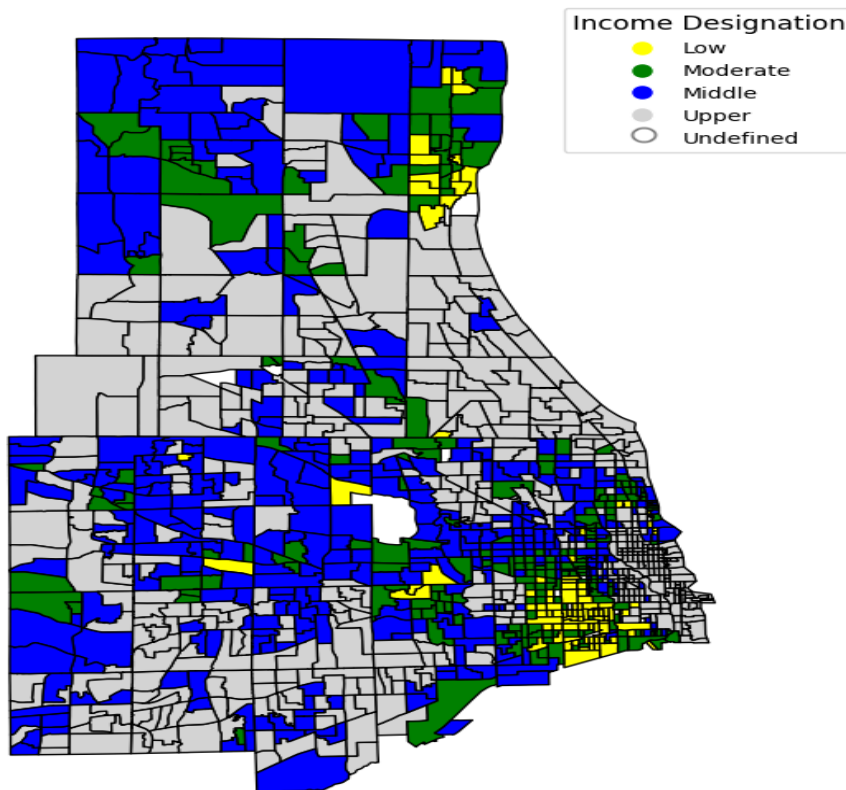
The Management Risk & Compliance Committee (“MRCC”) which consists of senior leadership from the lines of business, finance, compliance, and legal departments supports the CRA Officer in the implementation of the CRA Strategic plan and coordinating all CRA related activities, which include, but are not limited to, identifying community needs, capturing and qualifying bank activities for CRA credit, adhering to data collection and integrity procedures, annual goal setting, performance analysis, and partnering with the business teams to drive CRA qualified lending.

SECTION III. ASSESSMENT AREA

The Bank’s primary AA under this plan is defined as 1,191 census tracts consisting of all of Lake and DuPage counties and a portion of Cook County. This partial county designation of Cook County is consistent with regulatory guidance permitting assessment areas that consist of portions of counties, provided it: (1) reflects the institution’s lending and deposit-taking activities; (2) does not arbitrarily exclude LMI geographies; (3) does not reflect illegal discrimination; (4) consists only of whole census tracts; and (5) is not drawn in a manner that artificially inflates performance. The Bank does not maintain physical locations in the excluded portions of Cook County, and lending in those areas is incidental. Designating the full county would include areas where the bank has minimal lending presence and limited ability to influence community credit outcomes, which would not meaningfully reflect its performance.

Lake Michigan delineates the assessment area to the east and the southern border of the assessment area is from the southeast corner of DuPage County northeast along Interstate 55 to Lake Michigan. On the below map, the assessment area includes 97 (8.1%) low-income tracts highlighted in yellow, 214 (18%) moderate-income tracts highlighted in green, 376 (31.6%) middle-income tracts highlighted in blue, 494 (41.5%) upper-income tracts highlighted in grey, and ten tracts where income is not available (0.8%) unhighlighted.

CRA Tract Income Designation



SECTION IV. BANK'S SELF-ASSESSMENT

Post-acquisition, the Bank will continue to serve the convenience and needs of its community by providing largely the same products and services on which they have come to rely. The Bank's sole branch in Northbrook, IL will remain open and accessible to the public. The Bank can more effectively compete and serve a broader group of customers as a result of the injection of capital and resources and will be on even stronger financial footing to support lending to local businesses. During the CRA Strategic Plan period, the Bank plans to increase business operating accounts from its SBA loan customers to reduce reliance on higher-cost funding sources and lower funding costs.. This will result in a safer, more resilient banking organization that will be able to more reliably meet SMB demand through fluctuating market cycles.

Additionally, the Bank's marketing reach is enhanced through the national lending platform that will aid in identifying more lending customers in the AA and allows the Bank to broaden its reach to satisfy the critical lending needs of SMBs, including offering affordable small loans to historically underserved SMBs.

SECTION V. CRA PERFORMANCE CONTEXT

The OCC applies the various CRA tests and standards in the context of seven factors collectively referred to as a bank's CRA "performance context." These seven factors are:

1. Demographic and economic data
2. Product Offerings and Business Strategy
3. Lending, Investment and Service Opportunities
4. Institutional Capacity and Constraints
5. Performance of Bank and Similarly Situated Lenders
6. Public File and Written Comments
7. Any information deemed relevant by the OCC

The OCC also considers whether to approve a proposed strategic plan within those same "performance context" factors. The elements of the Bank's CRA performance context are discussed throughout this document. A summary of the factors is outlined as follows:

A. Demographic and Other Relevant Data

Demographic Data on Median Income Levels, Distribution of Household Income, Nature of Housing Stock, Housing Costs, and Other Relevant Data

The estimated median income levels in 2022, as determined by the 2022 – 5 Year American Community Survey (ACS), show the median family income (MFI) for the United States of America at \$74,755. The MFI for the state of Illinois is \$76,708.¹

(1) Median income levels and distribution of income.

Median income levels and distribution of income for Cook County

The 2020 5–Year ACS, using 2022 estimates, shows the MSA median family income (MFI) for Cook County at \$76,632.

The 2025 FFIEC Estimated Chicago-Naperville-Elgin, IL MD Median Family Income for this same county is \$117,400².

¹https://data.census.gov/table/ACSDP1Y2022.DP03?q=dp03&g=010XX00US_040XX00US17_050XX00US17031,17043,17097

² <https://www.ffiec.gov/data/census/> - This is the estimated median family income as determined by FFIEC for each MSA/MD in the United States and for each state's non-MSA/MD area. It is derived using the U.S. Department of Housing and Urban Development's (HUD) methodology published on its website. This field changes annually. All counties within an MSA/MD share the same Median Family Income.

Table 1a reflects the distribution of family income for Cook County as determined by the FFIEC Estimated Area Median Income. Table 1b provides a breakdown of census tract characteristics in Cook County within the Bank's AA.

Table 1a – Median Family Income (MFI) – Cook

Income Category	MFI Criteria	Income Threshold
Low	< 50%	Up to \$58,699
Moderate	50% up to < 80%	\$58,700 to \$93,919
Middle	80% up to < 120%	\$93,920 to \$140,879
Upper	120% +	\$140,880 +

Table 1b – Cook County Census Tract Characteristics

Census Tract Income Level	# of Tracts	% of Tracts	Population	% of Population
Low	83	10.21%	283,030	8.58%
Moderate	167	20.54%	710,190	21.53%
Middle	237	29.15%	1,035,832	31.39%
Upper	319	39.24%	1,255,174	38.04%
Unknown	7	0.86%	15,194	.46%
Total	813	100.00%	3,044,420	100.00%

Source: ffiec.gov

Median income levels and distribution of income for DuPage County

1) Median income levels and distribution of income. The 2022 5–Year ACS shows the MSA median family income (MFI) for DuPage County at \$102,152. The 2025 FFIEC Estimated Chicago-Naperville-Elgin, IL MD Median Family Income for this same county is \$117,400³.

Table 2a reflects the distribution of family income for DuPage County as determined by the FFIEC Estimated Area Median Income. Table 2b provides a breakdown of census tract characteristics within the Bank's AA.

Table 2a – Median Family Income (MFI) – DuPage County

Income Category	MFI Criteria	Income Threshold
Low	< 50%	Up to \$58,699
Moderate	50% up to < 80%	\$58,700 to \$93,919
Middle	80% up to < 120%	\$93,920 to \$140,879
Upper	120% +	\$140,800 +

³ <https://www.ffiec.gov/data/census/>

Table 2b – DuPage County Census Tract Characteristics

Census Tract Income Level	# of Tracts	% of Tracts	Population	% of Population
Low	1	0.46%	3,610	0.39%
Moderate	14	6.39%	58,454	6.27%
Middle	90	41.1%	389,491	41.75%
Upper	114	52.05%	481,322	51.59%
Total	219	100.00%	932,877	100.00%

Source: ffiec.gov

Median income levels and distribution of income for Lake County

1) Median income levels and distribution of income. The 2022 5–Year ACS shows the MSA median family income (MFI) for Lake County at \$101,442. The 2025 FFIEC Estimated Lake County, IL Median Family Income is \$143,000⁴.

Table 3a reflects the distribution of family income for Lake County as determined by the FFIEC Estimated Area Median Income. Table 3b provides a breakdown of census tract characteristics within the Bank’s AA.

Table 3a – Median Family Income (MFI) – Lake County

Income Category	MFI Criteria	Income Threshold
Low	< 50%	Up to \$71,499
Moderate	50% up to < 80%	\$71,500 to \$114,399
Middle	80% up to < 120%	\$114,400 to \$171,599
Upper	120% +	\$171,600 +

Table 3b – Lake County Census Tract Characteristics

Census Tract Income Level	# of Tracts	% of Tracts	Population	% of Population
Low	13	8.18%	51,565	7.22%
Moderate	33	20.75%	164,303	23.00%
Middle	49	30.82%	223,618	31.30%
Upper	61	38.36%	263,578	36.90%
Unknown	3	1.89%	11,278	1.58%
Total	159	100.00%	714,342	100.00%

Source: ffiec.gov

⁴ <https://www.ffiec.gov/data/census/>

DEMOGRAPHICS

In 2022, Illinois had a population of 12.8M people with a median age of 38.7 and a median household income of \$78,433. Between 2021 and 2022, the population of Illinois declined from 12.7M to 12.6M, a -0.85% decrease, and its median household income grew from \$72,563 to \$78,433, an 8.09% increase.

The five largest ethnic groups in Illinois are White (non-Hispanic) (59.6%), Black or African American (non-Hispanic) (13.7%), Other (Hispanic) (6.29%), White (Hispanic) (6.17%), and Asian (non-Hispanic) (5.73%).

23.4% of the households in Illinois reported speaking a non-English language at home as their primary shared language. This does not consider the potential multi-lingual nature of households but only the primary self-reported language spoken by all members of the household.

93.4% of the residents in Illinois are U.S. citizens.

The median household income in Illinois is \$78,433. In 2022, the county with the highest Median Household Income in Illinois was DuPage County, IL, with a value of \$107,035, followed by Kendall County, IL, and Lake County, IL, with respective values of \$106,358 and \$104,553.⁵

Cook County

In 2022, Cook County, IL, had a population of 5.23M people with a median age of 37.5 and a median household income of \$78,304. Between 2021 and 2022, Cook County, IL's population declined from 5.27M to 5.23M, a -0.76% decrease, and its median household income grew from \$72,121 to \$78,304, an 8.57% increase.

The five largest ethnic groups in Cook County, IL, are White (non-Hispanic) (41.1%), Black or African American (non-Hispanic) (22.4%), Other (Hispanic) (10.2%), White (Hispanic) (8.28%), and Asian (non-Hispanic) (7.63%).

35.8% of the households in Cook County, IL, reported speaking a non-English language at home as their primary shared language. This does not consider the potential multi-lingual nature of households but only the primary self-reported language spoken by all members of the household.

90.2% of Cook County, IL's residents are U.S. citizens.

⁵ <https://datausa.io/profile/geo/illinois>

The largest universities in Cook County, IL, are Northwestern University (9,725 degrees awarded in 2022), University of Illinois Chicago (8,607 degrees), and University of Chicago (7,328 degrees).

In 2022, the median property value in Cook County, IL, was \$293,700, and the homeownership rate was 57.5%.

Most people in Cook County, IL, drove alone to work, and the average commute time was 32.3 minutes. The average car ownership in Cook County, IL, was 2 cars per household.

Cook County, Illinois, borders DuPage County, Kane County, Lake County, McHenry County, Will County, and Lake County, IN,.⁶

DuPage County

In 2022, DuPage County, IL had a population of 931k people with a median age of 39.9 and a median household income of \$107,035. Between 2021 and 2022, the population of DuPage County, IL declined from 934,094 to 930,559, a -0.378% decrease, and its median household income grew from \$100,292 to \$107,035, a 6.72% increase.

The five largest ethnic groups in DuPage County, IL, are White (non-Hispanic) (64.5%), Asian (non-Hispanic) (12.5%), White (Hispanic) (5.52%), Black or African American (non-Hispanic) (4.75%), and two+ (Hispanic) (4.53%).

29.6% of the households in DuPage County, IL, reported speaking a non-English language at home as their primary shared language. This does not consider the potential multilingual nature of households but only the primary self-reported language spoken by all members of the household.

The largest universities in DuPage County, IL are Chamberlain University-Illinois (11,893 degrees awarded in 2022), DeVry University-Illinois (482477) (9,399 degrees), and College of DuPage (2,944 degrees).

In 2022, the median property value in DuPage County, IL, was \$361,700, and the homeownership rate was 73.1%.

Most people in DuPage County, IL, drove alone to work; the average commute time was 28.4 minutes. The average car ownership in DuPage County, IL, was 2 cars per household.

⁶<https://datausa.io/profile/geo/cook-county-il>

DuPage County, IL borders Cook County, IL, Kane County, IL, Kendall County, IL, and Will County, IL.⁷

Lake County

In 2022, Lake County, IL, had a population of 713k people with a median age of 38.7 and a median household income of \$104,553. Between 2021 and 2022, the population of Lake County, IL declined from 714,484 to 713,159, a -0.185% decrease, and its median household income grew from \$97,127 to \$104,553, a 7.65% increase.

The five largest ethnic groups in Lake County, IL, are White (non-Hispanic) (58.9%), Asian (non-Hispanic) (8.39%), White (Hispanic) (8.18%), Other (Hispanic) (7%), and two+ (Hispanic) (6.61%).

31.4% of the households in Lake County, IL reported speaking a non-English language at home as their primary shared language. This does not consider the potential multi-lingual nature of households but only the primary self-reported language spoken by all members of the household.

91% of Lake County, IL's residents are U.S. citizens.

The largest universities in Lake County, IL, are the College of Lake County (4,149 degrees awarded in 2022), Rosalind Franklin University of Medicine and Science (651 degrees), and Lake Forest College (483 degrees).

In 2022, the median property value in Lake County, IL, was \$313,700, and the homeownership rate was 73.8%.

Most people in Lake County, IL, drove alone to work, and the average commute time was 29.4 minutes. The average car ownership in Lake County, IL, was 2 cars per household.

Lake County, Illinois, borders Cook County, Illinois; McHenry County, Illinois;; and Kenosha County, Wisconsin.⁸

(2) Nature of housing stock and housing costs.

The median property value in Illinois was \$239,100 in 2022, which is 0.848 times smaller than the national average of \$281,900. Between 2021 and 2022, the median property value increased from \$212,600 to \$239,100, a 12.5% increase. The homeownership rate in Illinois is 66.7%, which is approximately the same as the national average of 64.8%.

⁷ <https://datausa.io/profile/geo/dupage-county-il>

⁸ <https://datausa.io/profile/geo/lake-county-il>

In 2023, 16.1% of the population was living with severe housing problems in Illinois. From 2014 to 2023, the indicator declined 1.96%.⁹

Cook County

The median property value in Cook County, IL, was \$293,700 in 2022, 1.04 times larger than the national average of \$281,900. Between 2021 and 2022, the median property value increased from \$266,800 to \$293,700, a 10.1% increase. The homeownership rate in Cook County, IL, is 57.5%, approximately the same as the national average of 64.8%.

In 2023, 20.5% of the population was living with severe housing problems in Cook County, IL. From 2014 to 2023, the indicator declined 3.28%.¹⁰

DuPage County

The median property value in DuPage County, IL, was \$361,700 in 2022, which is 1.28 times larger than the national average of \$281,900. Between 2021 and 2022 the median property value increased from \$324,900 to \$361,700, an 11.3% increase. The homeownership rate in DuPage County, IL, is 73.1%, which is approximately the same as the national average of 64.8%.

In 2023, 14.5% of the population was living with severe housing problems in DuPage County, IL. From 2014 to 2023, the indicator declined 0.875%.¹¹

Lake County

The median property value in Lake County, IL, was \$313,700 in 2022, 1.11 times larger than the national average of \$281,900. Between 2021 and 2022, the median property value increased from \$279,500 to \$313,700, a 12.2% increase. The homeownership rate in Lake County, IL, is 73.8%, approximately the same as the national average of 64.8%.

In 2023, 15% of Lake County, IL's population lived with severe housing problems. This indicator declined 2.22% from 2014 to 2023.¹²

(3) Other relevant data, including the assessment area's economic outlook.

The most recent statewide data available shows that in 2023 the economy of Illinois employed 6.02M people. The largest industries in Illinois were Elementary & secondary schools (374,012 people), Restaurants & Food Services (342,805 people), and Construction (305,335 people), and

⁹ <https://datausa.io/profile/geo/illinois#housing>

¹⁰ <https://datausa.io/profile/geo/cook-county-il#housing>

¹¹ <https://datausa.io/profile/geo/dupage-county-il#housing>

¹² <https://datausa.io/profile/geo/lake-county-il#housing>

the highest paying industries were Securities, commodities, funds, trusts & other financial investments (\$183,816), Legal services (\$152,238), and Pharmaceutical & medicine manufacturing (\$134,504).¹³

Cook County

There is more recent data on the economy of Cook County, IL, showing that in 2024, the County employed 2.6 million people. The largest industries in Cook County, IL, are Health Care and Social Assistance (359,511 people), Professional, scientific, and technical Services (297,875 people), and Educational Services (253,798 people). The highest-paying industries were Utilities (\$101,647), Management of Companies & Enterprises (\$99,653), and Finance & Insurance (\$97,314).¹⁴

DuPage County

The same 2024 data shows the economy of DuPage County, IL, employed 485k people. The largest industries in DuPage County, IL, were Health Care and Social Assistance (60,606 people), Manufacturing (57,595 people), and Professional, scientific, and technical Services (56,562 people). The highest-paying relevant industries were Finance and insurance (\$105,488) and Professional, Scientific, & Technical Services (\$103,539).¹⁵

Lake County

The 2024 data showed the economy of Lake County, IL, employed 357k people. The largest industries in Lake County, IL, were Manufacturing (55,333 people), Health Care and social Assistance (42,575 people), and Retail Trade (39,238 people). The highest-paying industries were Management of Companies and enterprises (\$126,500), Finance and insurance (\$102,777), and Professional, scientific, and technical Services (\$101,567).¹⁶

B. Product Offering and Business Strategy

The Bank's product offerings and business strategy are as follows.

Loan Products Offered

Loan Products include:

- Commercial & Industrial Loans including lines of credit and equipment loans.

¹³ <https://datausa.io/profile/geo/illinois#economy>

¹⁴ <https://datausa.io/profile/geo/cook-county-il#economy>

¹⁵ <https://datausa.io/profile/geo/dupage-county-il#economy>

¹⁶ <https://datausa.io/profile/geo/lake-county-il#economy>

- Commercial Real Estate Loans
- Construction Loans

Deposit Products Offered

Deposit Products available to both individuals and businesses include:

- Personal Checking
- Business Checking
- Personal Savings
- Business Savings
- NOW Accounts
- Money Market Accounts
- Certificates of Deposit
- IRA CDs
- Health Savings Account
- Safe Deposit Boxes

Business Strategy

SmartBiz Bank provides financial and related services to small and medium businesses. While it accepts deposits from both consumers and commercial businesses, it lends primarily to commercial entities or individuals for commercial purposes. The Bank also uses a combination of brokered, core, wholesale, brokered and reciprocal deposits for its funding.

All services are offered within the AA. In addition, the Bank works with a network of referral partners (e.g., CPA firms, registered investment advisors, lawyers, etc.) who refer SMBs to the Bank from across the nation to access the capital and financial services they need for their businesses.

C. Lending, Investment, and Service Opportunities

Information regarding lending, investment, and service opportunities in the Bank's assessment area.

The community needs discussed in Section VI: Public Participation, can be supported through community development ("CD") activity. Per the current regulation, CD means: affordable housing (including multifamily rental housing) for LMI individuals; community services targeted to LMI individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs or have gross annual

revenues of \$1 million or less; or activities that revitalize or stabilize LMI geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies designated by the Office of the Comptroller of the Currency.

Opportunities to participate in CD activities are available through CD loans, consortia lending, qualified investments including grants, and CD service activities. Listed below are potential opportunities based on needs identified in the Bank's AA.

Affordable housing

- Down payment assistance through housing nonprofits including CDFIs and nonprofit organizations focused on housing.
- Investments/loans that finance affordable units. There are community development nonprofit organizations that assist in providing lending related to affordable housing. These include:
 - CDFIs provide consortium lending, primarily to provide permanent lending to low-income housing tax credit multifamily projects.
 - CDFIs provide financing for single-family affordable housing in which banks may provide lines of credit to facilitate this lending.
 - Nonprofit intermediaries provide financing for developers to purchase land, finance predevelopment expenses, and provide construction financing for affordable housing projects.
- Favorable debt financing for low-income housing tax credit (LIHTC) projects, or participation in multi-investor syndicated LIHTC or Affordable Housing Preservation Funds.
- Opportunities for investment in taxable housing bonds or qualified mortgage-backed securities (MBS).
- SmartBiz Bank's unique approach may involve the purchase of qualified MBS, housing bonds, qualified municipal bonds, and agency paper that supports affordable housing and economic development throughout the Bank's AA. All investments considered will meet the definition of community development.

Economic development

- SmartBiz's economic development initiatives, which may include small business training, loan programs, and various Small Business Development Centers that significantly impact the Bank's AA.
- Volunteer service to nonprofits, cities, and counties that support economic development through revolving loan programs.
- Participation in multi-investor Small Business Investment Company (SBIC) funds.
- Venture Capital Funds and private placement of CD dollars in partnership with Angel Investors, other banks, etc., in Opportunity Zones or other economically disadvantaged communities

Essential community services

- Job skill training through applied technology centers within the Bank's AA.
- Volunteer Income Tax Assistance provided to LMI individuals throughout the Bank's AA.

D. Institutional Capacity and Constraints

Institutional capacity and constraints, including the size and financial condition of the Bank, economic climate, safety and soundness limitations, and any other factors that significantly affect the Bank's ability to provide lending, investments, or services in its assessment area(s).

Bank assets total approximately \$146.1 million as of June 30, 2024, which included total loans of \$101.9 million, representing 69.7 percent of total assets. The commercial loan portfolio totaled \$89.0 million and represented 86.4 percent of the total loan portfolio. The commercial loan portfolio consisted of \$27.9 million in commercial and industrial loans and \$61.1 million in commercial real estate loans. The residential loan portfolio totaled \$10.6 million; consumer loans make up less than 1 percent of the total portfolio at \$1,000. Tier 1 capital was \$20.3 million as of June 30, 2024.

Although select opportunities exist within the Bank's assessment area for community development loans, investments, and services, the ability of banks like SmartBiz Bank to participate is limited due to the intense competition of a high number of banks, both federally- and state-chartered, within the assessment area. Per the FDIC Summary of Deposits webpage for June 30, 2023, 100 banks with 1,167 FDIC-insured offices hold \$416 billion in deposits in Cook County, IL, which is part of the Bank's Assessment Area. With only one branch, the Bank holds 0.03 percent of deposits in the assessment area and is ranked 78th in the number of deposits. The largest ten banks in the assessment area hold 82.5 percent of deposits. The presence of such a large number of banks, and large number of branches along with the high level of competition in the bank's Assessment Area, makes it difficult for a small one branch bank, such as SmartBiz Bank, to originate significant retail small business loans, community development loans, and qualified investments. SmartBiz Bank is primarily a lender of Small Business Administration ("SBA") 7(a) loans. Examining the 2023 CRA MSA Aggregate Report for Cook County alone shows almost 200 SBA 7(a) lenders with a median of 13 SBA loans originated per institution.

Federal banking regulators have also recognized the high level of competition for mortgage lending and small business lending in the assessment area. In the Centrust's March 2020 CRA performance evaluation, examiners noted the high level of competition. They said the following:

“The bank is located in the Chicagoland area, with a portion of the AA falling in the northern part of Cook County, a saturated market. As a result, the bank faces significant competition from local banks and larger, nationwide institutions. We also considered internal factors in the LTD ratio rating, such as the bank’s primary lending focus on commercial loans to businesses rather than home mortgage lending. This specialized lending focus further limits lending opportunities given market competition for the same types of loans.”

This is not the only performance evaluation that mentions the intense levels of competition in the Assessment Area. Other institutions have similar language, for instance in the most recent Performance Evaluation of Schaumburg Bank & Trust, N.A., examiners noted that:

“In performing the analysis of investments, we considered the high level of competition in the AA when formulating our conclusion. Competition is high, with large interstate, regional, and community banks competing for qualified investments in the market.”

The AA’s overall number of increasingly large banks competing for the same CD loans and investments results in significantly higher pricing and “CRA premiums” on many loans and investments.

E. Performance

The Bank’s past performance and the performance of similarly situated lenders.

1. Centrust Bank, N.A. (“Centrust”) and SmartBiz Past CRA Performance.

Centrust was a full-service community bank headquartered in Northbrook, Illinois (“IL”), wholly owned by its Holding Company, United Community Bancshares, Inc. (“UCB”). Centrust was primarily a commercial lender also offering a variety of consumer and small business deposit products. SmartBiz Bank will offer additional products focused on a national footprint.

Listed below are performance lending metrics for the last three full calendar years prior to purchase and YTD from January 1, 2024, to June 30, 2024. The last CRA performance evaluation for Centrust is dated March 3, 2024. The information below does not include PPP loans. The information presented in this section includes all loans originated/purchased by Centrust rather than a sampling of loans.

Assessment Area Concentration

Centrust Bank			
Small Business Lending AA Concentration Excluding PPP			
Year	By Count		Total
	In	Out	Percentage
2021	14	20	41.2%
2022	42	34	55.3%
2023	26	34	43.3%
Q1 & Q2 2024	11	13	45.8%

SmartBiz			
Small Business Lending AA Concentration Excluding PPP			
Year	By Count		Total
	In	Out	Percentage
2021	6	242	2.4%
2022	14	498	2.7%
2023	49	1,577	3.0%
Q1 & Q2 2024	24	1039	2.3%

The Bank evaluated the in/out ratio by the number of loans (by count). Information shows that the number of loans within the assessment area varies by year, but a majority of the loans originate outside of the assessment area. Projections are that this trend will continue as SmartBiz and Centrust portfolios are combined. Therefore, AA Concentration will not be a measured metric under this Strategic Plan.

Borrower Profile (Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues)

Centrust Bank			
Small Business Lending Borrower Profile Excluding PPP			
Year	By Count		Percent
	Revenue <\$1MM	Total SB Loans	
2021	7	14	50.0%
2022	17	42	40.5%
2023	22	26	84.6%
Q1 & Q2 2024	5	11	45.5%

SmartBiz			
Small Business Lending Borrower Profile Excluding PPP			
Year	By Count		Percent
	Revenue < \$1MM	Total SB Loans	
2021	4	6	66.7%
2022	7	14	50.0%
2023	25	49	51.0%
Q1 & Q2 2024	13	24	54.2%

The chart above measures the distribution of loans within the assessment area by the borrower's income level (gross annual revenues), excluding PPP loans. The information above is not a sample by years but includes all eligible loans to be measured under this metric. Percentages for this metric range from a low of 40.5 percent by Centrust in 2022 to a high of 66.7 percent from SmartBiz in 2021. These percentages are higher than aggregate peer data but less than the percentage of small businesses in the assessment area.

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

Centrust Bank			
Small Business Lending Geographic Distribution Excluding PPP			
Year	By Count		Combined
	Percent in Low-Income Census Tracts	Percent in Moderate-Income Census Tracts	Percent in LMI Census Tracts
2021	0.00%	64.3%	64.3%
2022	7.1%	7.1%	14.3%
2023	0.0%	3.8%	3.8%
Q1 & Q2 2024	0.0%	9.1%	9.1%

SmartBiz			
Small Business Lending Geographic Distribution Excluding PPP			
Year	By Count		Combined
	Percent in Low-Income Census Tracts	Percent in Moderate-Income Census Tracts	Percent in LMI Census Tracts
2021	0.00%	0.0%	0.0%
2022	7.1%	35.7%	42.9%
2023	4.1%	14.3%	18.4%
Q1 & Q2 2024	0.0%	4.2%	4.2%

The chart above measures the distribution of small business loans by income level of the geography, excluding PPP loans, by the total number of loans originated/purchased annually within the assessment area in LMI geographies. Other than in 2022, Centrust did not originate any loans to small businesses in low-income census tracts, and Smart Biz also did not originate any loans in low-income census tracts in 2021 and 2024. SmartBiz had not focused efforts in the AA previously. Centrust did attempt to originate these loans, but the competition for small business lending in the Assessment Area is intense. Examining the 2023 CRA MSA Aggregate Report for Cook County alone shows almost 200 institutions that originate SBA Loans with a median of 13 total loans per institution, the report does not indicate how many of those 13 would have been in an LMI census tract. The median number does not include small lenders (like Centrust) that are not required to report this data.

Regarding loans made in moderate-income tracts, the percentages vary significantly for both the Bank and SmartBiz. This trend does comport with the similarly situated peers in the area, three of the institutions reviewed failed to originate a small business loan in a low-income census tract.

2. Performance of Similarly Situated Lenders.

The Bank has performed an extensive analysis of similarly situated lenders. Appendix C contains additional information regarding this analysis.

The data from the peer analysis confirmed that the bank's measurable goals under this CRA strategic plan were aligned with similarly situated lender activity in the Bank's assessment area.

F. Public File and Written Comments

The Bank's public file is maintained in compliance with the requirements of CRA regulations. The Bank's CRA Notice is prominently displayed in the Bank's lobby of its main office, as required by the CRA regulation. To date, the Bank's public file contains no adverse comments from the public regarding the Bank's CRA performance.

SECTION VI: PUBLIC PARTICIPATION

A. Public Participation and Informal Suggestions

The Bank has used two methods to identify community needs. First, it gathered information from bank CRA performance evaluations to determine community needs. Second, it gathered consolidated HUD plans from cities within the assessment area and identified the major needs in the community.

SmartBiz Bank also solicited formal public comment on the proposed Strategic Plan for 30 days by publishing notice in at least one newspaper of general circulation in the assessment area, as required by 12 C.F.R. §25.27(d)(2), and would have made copies of this Strategic Plan available to members of the public who requested it during the 30-day timeframe had a copy been requested. The Bank's request for comment was published on December 12, 2025. A copy of the proof of publication is attached as Appendix D.

Needs Identified in Bank Performance Evaluations

Another means the Bank used to assess community needs was the review of Centrust's CRA performance evaluation from June of 2024.

The purpose of reviewing this performance evaluation was to identify needs mentioned by community contacts. When a regulator evaluates a bank's CRA performance, they will assess community needs by periodically reaching out to community contacts who are involved in community development work in the Bank's AA.

Two needs related to small business and community development were identified and are listed below:

- Providing financing for economic development, including acquiring and rehabbing older properties

Providing access to capital for small entrepreneurs

Needs Identified through HUD Consolidated Plans

The Bank also reviewed HUD consolidated plans for Cook County, DuPage County, and Lake County. The Cook County plan focused on three areas, not in order of priority:

- Improving infrastructure and public facilities with an emphasis on economic development and fair housing

- Business and Workforce Development with a focus on job clusters
- Housing Development and Services through housing preservation, affordable housing in areas with high job opportunities, and work to remove housing barriers.

The DuPage County Plan focused on serving needs in the following areas:

- Providing decent housing in both rehabilitation and new construction
- Municipal infrastructure for LMI neighborhoods and individuals
- Capital improvements to public facilities assisting LMI individuals
- Focus on the Continuum of Care and serving homeless needs
- Public service needs such as emergency shelter, legal assistance to the homeless, and tenant-based rental assistance

The Lake County Plan focused on the following needs:

- Assist in expanding the supply of housing in High Outcome areas. High Outcome Areas consist of census tracts where the expected household income for persons growing up there is greater than 80% Area Median Income, with low incarceration rates, per the Opportunity Atlas (<https://www.opportunityatlas.org/>) based on U.S. Census data.
- Revitalize areas with a large concentration of LMI households and neighborhoods

Summary of Informal Community Needs

The needs identified in CRA performance evaluations focus on financing small businesses and making small loans available to businesses in the AA. Additionally, community development services related to nonprofit boards and credit education related to small businesses and homebuyer programs are of the utmost importance.

Regarding HUD Consolidated plans, a common theme is the need to assist with affordable housing, especially near areas where jobs may be located within the county. Second, municipalities need to assist with public infrastructure focused on meeting LMI individual needs.

SECTION VII. THE BANK'S CRA STRATEGIC PLAN AND MEASURABLE GOALS

A. Proposed Effective Date

The proposed effective date of the Strategic Plan is April 1, 2026.

B. Plan Term

The Bank's Strategic Plan covers three years: April 1, 2026 to March 31, 2028. The Plan sets forth annual measurable goals for interim years under which the OCC can evaluate the Bank's performance.

C. Measurable Goals

The OCC's strategic plan regulations provide flexibility regarding a bank's measurable goals, both in how the goals are expressed and regarding the three performance categories.

The Bank believes that the appropriate emphasis for its measurable goals fall into the two categories discussed below:

- 1. Measurable goals for small business lending, by count, based on geographic distribution of loans.*
- 2. Measurable goals for community development activity for qualified investments and a separate goal for community development services.*

A listing of measurable goals is outlined in Appendix A.

D. Ratings

Election if Satisfactory Goals Not Substantially Met

Statements about the expected future activity of the Bank and all other statements in this Plan, other than historical facts, constitute forward-looking statements. These forward-looking statements are subject to risks and uncertainties that may change at any time, and therefore, actual results may differ materially from expectations by the Bank. Additionally, the Bank has identified business constraints that may affect performance under this Plan. However, if the Bank fails to substantially meet the goals of satisfactory under the CRA strategic plan test, the Bank desires to be measured under the applicable CRA examination procedures the Bank would fall under for the size of the Bank. The Bank is currently a small bank.

SECTION VIII. CONTACT INFORMATION

Any questions or comments regarding this Strategic Plan may be addressed to the following:

Jacob Lang
Chief Compliance Officer and CRA Officer
50 Francisco St., Suite 205
San Francisco, CA
Phone: 847-267-1331

Matt Tilton
Chief Lending Officer
385 385 Waukegan Rd
Northbrook, IL 60062
Phone: 847-267-1331

APPENDICES

- A. Measurable Goals
- B. Assessment Area Map and Census Tract List
- C. Analysis of Similarly Situated Lenders
- D. Proof of Publication of Request for Public Comment

Appendix A: Measurable Goals

SmartBiz proposes the following for its annual measurable goals for its assessment area:

Institution: SmartBiz Bank, N.A.

Plan Period: April 1, 2026 to March 31, 2028

Primary Market Area: Bank's AA: DuPage and Lake Counties, and part of Cook County, IL

Lending Test:

Goal #1: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues (Borrower Profile), by Count

Borrower Profile by Count		
Plan Year Beginning	Satisfactory	Outstanding
2026	48%	52%
2027	50%	54%
2028	52%	56%

SmartBiz will measure this metric by calculating the percentage distribution of the number of originated or purchased loans to businesses with revenues less than \$1 million compared to the percentage distribution of loans to businesses (regardless of revenue size) in the Bank's AA.

In determining the satisfactory goal, the Bank reviewed its past performance, similarly situated lenders' performance, and aggregated CRA lending's context.

Past performance by SmartBiz shows an average of 52.7 percent. Past performance by Centrust shows an average over 3.5 years of 54.8 percent. The average performance for similarly situated lenders was 58.6 percent, and the peer aggregate data from Centrust Bank's last CRA performance evaluation was 44.3 percent in 2021 and 52.7 percent in 2022-2023 for the AA.

In consideration of all the data, the Bank is proposing a beginning satisfactory goal of 48 percent, considering the peer aggregate data and realizing the high level of competition in the area to meet this performance metric. The goal then increases in Year Two of the Plan to 50% and 52% in Year Three as the bank grows and establishes more of a presence in the AA.

For an outstanding goal, the Bank increased its percentage from satisfactory by 4 percent for each year of the plan: 52 percent in Year 1; 54% in Year 2, and 56% in Year 3. This aligns more

with Centrust's past performance, but would be a stretch goal for the newly formed Bank. As the Bank grows, the number of loans required for the Bank to meet a Satisfactory or Outstanding Rating increases over every year of the plan even though the goal percentages do not change. However, should the Bank fail to grow as expected, keeping the goals the same from year-to-year allows the Bank to meet its goals with a smaller number. At times evaluations reflect goals increasing year-over-year commensurate with growth in the bank's asset size. However, SmartBiz Bank's primary goal must be to safely and soundly grow the bank prior to committing a large increase in the count percentages themselves. Further, the impact of recent changes to the SBA program, which is a substantial part of the Bank's lending portfolio, must be evaluated prior to increasing the percentages within this plan.

Goal #2: Assessment Area Distribution of Loans to Small Businesses by Income of the Geography (Low- and Moderate-Income Census Tracts, by Count)

Geographic Distribution by Count				
Plan Year Beginning	Satisfactory in Low -Income Census Tracts	Satisfactory in Moderate- Income Census Tracts	Outstanding in Low-Income Census Tracts	Outstanding in Moderate-Income Census Tracts
2026	2.6%	10.9%	3.0%	13.0%
2027	2.6%	10.9%	3.0%	13.0%
2028	2.6%	10.9%	3.0%	13.0%

SmartBiz will measure this metric by calculating the percentage distribution of the number of loans to small businesses that were originated and purchased by the bank in low- and moderate-income geographies compared to the total number of loans to small businesses in the Bank's AA.

In determining the satisfactory goal, the Bank reviewed its past performance, the performance context, and the information from similarly situated lenders. Past performance by both Centrust Bank and SmartBiz did not show any consistent performance patterns. The range was from 0.0 percent to 7.1 percent in low-income census tracts and 0.0 percent to 64.3 percent in moderate-income census tracts. In reviewing similarly situated lenders' performance, the median performance level in low-income census tracts was 0.0 percent and in moderate-income census tracts the median was 16.0 percent.

In summarizing all the data, the Bank felt the appropriate target was 2.6 percent in low-income census tracts and 10.9 percent in moderate-income census tracts for a satisfactory rating. For an outstanding rating the Bank is targeting 3.0% in low-income census tracts and 13.0 percent in moderate-income census tracts. Similar to Goal #1, as the Bank grows, there is an increase in the number of loans necessary to achieve a Satisfactory rating in each year of this plan. Historically, there is no consistency when looking at Centrust and SmartBiz data to determine prior performance in this metric. Therefore, it is difficult to project increases in the listed goal percentages. Lastly, given that the number of loans in the Bank's business plan is relatively small during the initial stages of growth, any failure to meet the origination objectives of the business plan could cause the Bank to fail this metric. It is important that the Bank have an opportunity to meet the thresholds for a Satisfactory rating while serving the needs of the community, obtaining consistent metrics, and setting a proper baseline for the growth of this goal moving forward.

Community Development Test:

Goal #3: Community Development Loans and Qualified Investments inside the AA as a percentage, measured by dollars, of average assets* of the Bank.

CD Loans and Qualified Investments Inside the AA as a Percentage of Average Assets of the Prior Calendar Year		
Plan Year Beginning	Satisfactory	Outstanding
2026	1%	1.2%
2027	1.2%	1.4%
2028	1.4%	1.6%

SmartBiz will measure new Qualified Investments, prior period Qualified Investments still on the Bank's books at the end of the plan year, new CD Loans either originated or purchased by the Bank, and existing CD Loans that are renewed and credit underwritten that year (can only count each loan once per year) divided by the Bank's average assets* for the prior calendar year. Average assets are calculated using the average number of assets from line 9 of the Schedule RC-K four call reports during the plan year.

The initial goal for a satisfactory rating will be 1.0% percent, and an outstanding rating will be 1.2% percent. These goals increase to 1.2% for satisfactory and 1.4% for outstanding in Year 2 of the Plan and 1.4% for satisfactory and 1.6% for outstanding in Year 3.

In determining the appropriate metrics for this goal, the Bank relied primarily on the intermediate small banks (ISBs) in the similarly situated lender analysis, along with two other large banks in the AA that had similar attributes as the Bank but were not included in the

benchmarking analysis due to the size of the financial institutions. A review of the peer analysis in Appendix C shows that the ISBs had an average performance metric of 2.2%. However, SmartBiz Bank is approximately one-third the size of the smallest ISB in the peer review. Indeed, SmartBiz Bank would qualify as a small institution and only be subject to the Lending Test absent this Strategic Plan. The Bank needs to focus on stability and growth before committing additional assets to match those of the much larger ISBs reviewed. Further, these ISBs have all of their personnel, resources, and multiple branches in the AA. SmartBiz Bank lacks similar resources and presence in the AA. In addition, the large banks reviewed had annual performance metrics ranging from 0.8 percent to 1.0 percent for combined CD Loans, qualified investments, and grants. Considering all this information led to the Bank's conclusion on the metrics for a satisfactory and outstanding rating. As the Bank responsibly grows, it requires a greater dollar amount of qualified loans and investments to meet the Satisfactory and Outstanding Goals set herein. Reserving commitments to expenditures while still meeting the needs of the community should be paramount.

* The Bank's average assets for any planned year will be calculated using the average number of assets from line 9 of Schedule RC-K of the Bank's four call reports during the prior calendar year.

Goal #4: Community development service hours (per employee in AA)

CD Service Hours per Employee in Assessment Area		
Plan Year Beginning	Satisfactory	Outstanding
2026	1	2
2027	1	2
2028	1	2

The Bank will provide community development service hours located in the Assessment Area per calendar year as described below, which may include but are not limited to service on qualifying nonprofit boards or committees. Each Bank employee does not have to complete community development service hours, but all are eligible to do so in order for the Bank to meet these requirements.

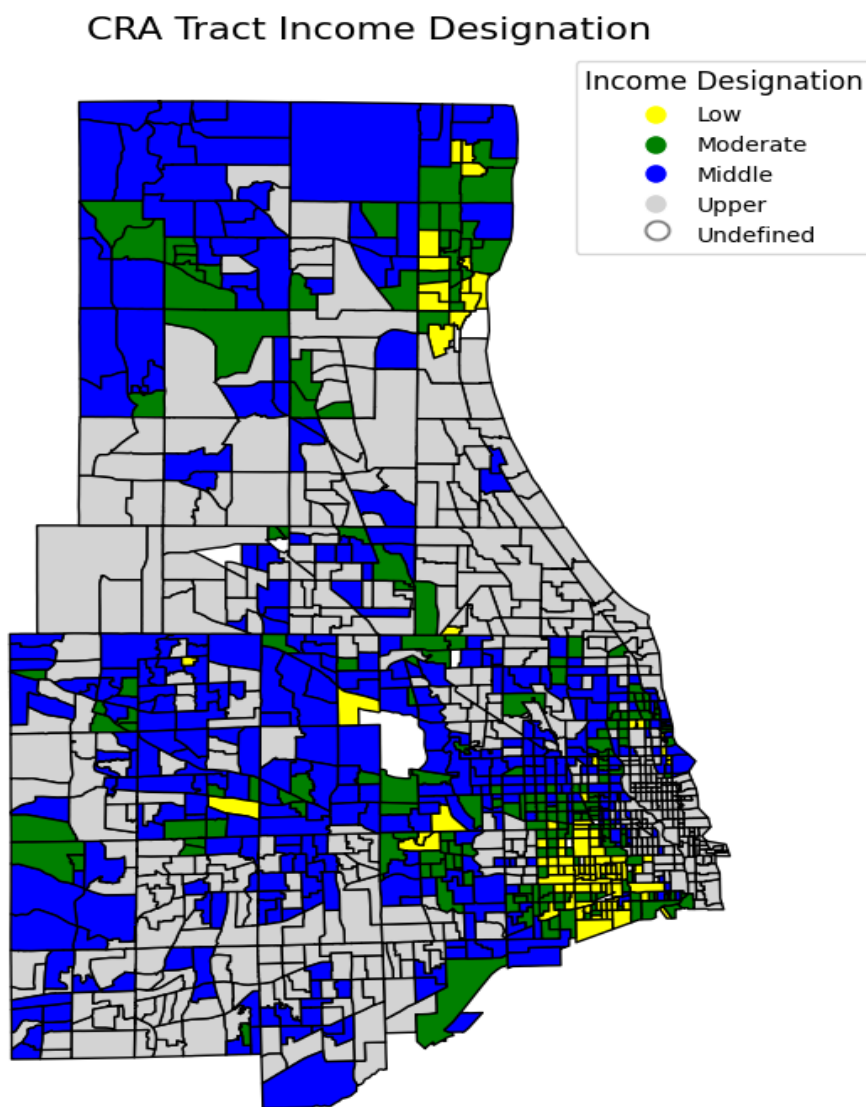
The service hours commitment herein and above reflects the total number of full-time employees within the AA, currently at 30. Personnel available for community development service hours does not grow proportionately with asset size, particularly within the AA. Because of these constraints, it is prudent for the Bank to set goals that can be realistically performed by the Bank's relatively small staff in the AA. The Bank has proposed one hour per full-time employee in the AA for a satisfactory rating, which would be a total of 30 hours given the

current staffing. For an outstanding rating, the Bank has proposed 2 hours per full-time employee in each year of the plan, which would be 60 hours given the current staffing. Any SmartBiz Bank employee is eligible to perform community development service hours in the AA. It is important to note that the Bank is considering opening an additional branch within the AA in year three of the plan. If this happens, there will be an increase in staff necessitating keeping the existing Service Hour requirement per full-time employee for a satisfactory rating. Further, Centrust has never reported or tracked this metric previously and SmartBiz is also new to tracking and reporting volunteerism. Therefore, this type of scaling and growth of community development service hours allows for thoughtful build-up and development of CD services and volunteerism within the community.

In determining the benchmarks for this goal, the Bank noted the ISBs in the similarly situated analysis averaged 2 events and had median service hours of less than one-hour per full-time employee in the AA.

Appendix B: Assessment Area Map and Cook County Census Tract List

The Bank's primary AA under this plan is defined as 1,191 census tracts consisting of all of Lake and DuPage counties and a portion of Cook County. Lake Michigan delineates the assessment area to the east and the southern border of the assessment area is from the southeast corner of DuPage County northeast along Interstate 55 to Lake Michigan. The assessment area includes 97 (8.1%) low-income tracts highlighted in yellow, 214 (18%) moderate-income tracts highlighted in green, 376 (31.6%) middle-income tracts highlighted in blue, 494 (41.5%) upper-income tracts highlighted in grey, and ten tracts where income is not available (0.8%) unhighlighted.



Appendix B: Assessment Area Map and Cook County Census Tract List

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031010100	Cook	IL	17	17031
17031010201	Cook	IL	17	17031
17031010202	Cook	IL	17	17031
17031010300	Cook	IL	17	17031
17031010400	Cook	IL	17	17031
17031010501	Cook	IL	17	17031
17031010502	Cook	IL	17	17031
17031010503	Cook	IL	17	17031
17031010600	Cook	IL	17	17031
17031010701	Cook	IL	17	17031
17031010702	Cook	IL	17	17031
17031020100	Cook	IL	17	17031
17031020200	Cook	IL	17	17031
17031020301	Cook	IL	17	17031
17031020302	Cook	IL	17	17031
17031020400	Cook	IL	17	17031
17031020500	Cook	IL	17	17031
17031020601	Cook	IL	17	17031
17031020602	Cook	IL	17	17031
17031020701	Cook	IL	17	17031
17031020702	Cook	IL	17	17031
17031020801	Cook	IL	17	17031
17031020802	Cook	IL	17	17031
17031020901	Cook	IL	17	17031
17031020902	Cook	IL	17	17031
17031030101	Cook	IL	17	17031
17031030102	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031030103	Cook	IL	17	17031
17031030104	Cook	IL	17	17031
17031030200	Cook	IL	17	17031
17031030300	Cook	IL	17	17031
17031030400	Cook	IL	17	17031
17031030500	Cook	IL	17	17031
17031030601	Cook	IL	17	17031
17031030603	Cook	IL	17	17031
17031030604	Cook	IL	17	17031
17031030701	Cook	IL	17	17031
17031030702	Cook	IL	17	17031
17031030703	Cook	IL	17	17031
17031030706	Cook	IL	17	17031
17031030800	Cook	IL	17	17031
17031030900	Cook	IL	17	17031
17031031000	Cook	IL	17	17031
17031031100	Cook	IL	17	17031
17031031200	Cook	IL	17	17031
17031031300	Cook	IL	17	17031
17031031400	Cook	IL	17	17031
17031031501	Cook	IL	17	17031
17031031502	Cook	IL	17	17031
17031031700	Cook	IL	17	17031
17031031800	Cook	IL	17	17031
17031031900	Cook	IL	17	17031
17031032100	Cook	IL	17	17031
17031040100	Cook	IL	17	17031
17031040201	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031040202	Cook	IL	17	17031
17031040300	Cook	IL	17	17031
17031040401	Cook	IL	17	17031
17031040402	Cook	IL	17	17031
17031040600	Cook	IL	17	17031
17031040700	Cook	IL	17	17031
17031040800	Cook	IL	17	17031
17031040900	Cook	IL	17	17031
17031050100	Cook	IL	17	17031
17031050200	Cook	IL	17	17031
17031050300	Cook	IL	17	17031
17031050500	Cook	IL	17	17031
17031050600	Cook	IL	17	17031
17031050700	Cook	IL	17	17031
17031050800	Cook	IL	17	17031
17031050900	Cook	IL	17	17031
17031051000	Cook	IL	17	17031
17031051100	Cook	IL	17	17031
17031051200	Cook	IL	17	17031
17031051300	Cook	IL	17	17031
17031051400	Cook	IL	17	17031
17031060100	Cook	IL	17	17031
17031060200	Cook	IL	17	17031
17031060300	Cook	IL	17	17031
17031060400	Cook	IL	17	17031
17031060500	Cook	IL	17	17031
17031060800	Cook	IL	17	17031
17031060900	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031061000	Cook	IL	17	17031
17031061100	Cook	IL	17	17031
17031061200	Cook	IL	17	17031
17031061500	Cook	IL	17	17031
17031061800	Cook	IL	17	17031
17031061901	Cook	IL	17	17031
17031061902	Cook	IL	17	17031
17031062000	Cook	IL	17	17031
17031062100	Cook	IL	17	17031
17031062200	Cook	IL	17	17031
17031062300	Cook	IL	17	17031
17031062400	Cook	IL	17	17031
17031062500	Cook	IL	17	17031
17031062600	Cook	IL	17	17031
17031062700	Cook	IL	17	17031
17031062800	Cook	IL	17	17031
17031062900	Cook	IL	17	17031
17031063000	Cook	IL	17	17031
17031063100	Cook	IL	17	17031
17031063200	Cook	IL	17	17031
17031063301	Cook	IL	17	17031
17031063302	Cook	IL	17	17031
17031063303	Cook	IL	17	17031
17031063400	Cook	IL	17	17031
17031070101	Cook	IL	17	17031
17031070102	Cook	IL	17	17031
17031070103	Cook	IL	17	17031
17031070200	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031070300	Cook	IL	17	17031
17031070400	Cook	IL	17	17031
17031070500	Cook	IL	17	17031
17031070600	Cook	IL	17	17031
17031070700	Cook	IL	17	17031
17031071000	Cook	IL	17	17031
17031071100	Cook	IL	17	17031
17031071200	Cook	IL	17	17031
17031071300	Cook	IL	17	17031
17031071400	Cook	IL	17	17031
17031071500	Cook	IL	17	17031
17031071600	Cook	IL	17	17031
17031071700	Cook	IL	17	17031
17031071800	Cook	IL	17	17031
17031080100	Cook	IL	17	17031
17031080201	Cook	IL	17	17031
17031080202	Cook	IL	17	17031
17031080300	Cook	IL	17	17031
17031080400	Cook	IL	17	17031
17031081000	Cook	IL	17	17031
17031081100	Cook	IL	17	17031
17031081201	Cook	IL	17	17031
17031081202	Cook	IL	17	17031
17031081300	Cook	IL	17	17031
17031081401	Cook	IL	17	17031
17031081402	Cook	IL	17	17031
17031081403	Cook	IL	17	17031
17031081500	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031081600	Cook	IL	17	17031
17031081700	Cook	IL	17	17031
17031081800	Cook	IL	17	17031
17031081900	Cook	IL	17	17031
17031090100	Cook	IL	17	17031
17031090200	Cook	IL	17	17031
17031090300	Cook	IL	17	17031
17031100100	Cook	IL	17	17031
17031100200	Cook	IL	17	17031
17031100300	Cook	IL	17	17031
17031100400	Cook	IL	17	17031
17031100500	Cook	IL	17	17031
17031100600	Cook	IL	17	17031
17031100700	Cook	IL	17	17031
17031110100	Cook	IL	17	17031
17031110200	Cook	IL	17	17031
17031110300	Cook	IL	17	17031
17031110400	Cook	IL	17	17031
17031110501	Cook	IL	17	17031
17031110502	Cook	IL	17	17031
17031120100	Cook	IL	17	17031
17031120200	Cook	IL	17	17031
17031120300	Cook	IL	17	17031
17031120400	Cook	IL	17	17031
17031130100	Cook	IL	17	17031
17031130200	Cook	IL	17	17031
17031130300	Cook	IL	17	17031
17031140100	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031140200	Cook	IL	17	17031
17031140301	Cook	IL	17	17031
17031140302	Cook	IL	17	17031
17031140400	Cook	IL	17	17031
17031140500	Cook	IL	17	17031
17031140601	Cook	IL	17	17031
17031140602	Cook	IL	17	17031
17031140701	Cook	IL	17	17031
17031140702	Cook	IL	17	17031
17031140800	Cook	IL	17	17031
17031150200	Cook	IL	17	17031
17031150300	Cook	IL	17	17031
17031150401	Cook	IL	17	17031
17031150402	Cook	IL	17	17031
17031150501	Cook	IL	17	17031
17031150502	Cook	IL	17	17031
17031150600	Cook	IL	17	17031
17031150700	Cook	IL	17	17031
17031150800	Cook	IL	17	17031
17031151001	Cook	IL	17	17031
17031151002	Cook	IL	17	17031
17031151100	Cook	IL	17	17031
17031151200	Cook	IL	17	17031
17031160100	Cook	IL	17	17031
17031160200	Cook	IL	17	17031
17031160300	Cook	IL	17	17031
17031160400	Cook	IL	17	17031
17031160501	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031160502	Cook	IL	17	17031
17031160601	Cook	IL	17	17031
17031160602	Cook	IL	17	17031
17031160700	Cook	IL	17	17031
17031160800	Cook	IL	17	17031
17031160900	Cook	IL	17	17031
17031161000	Cook	IL	17	17031
17031161100	Cook	IL	17	17031
17031161200	Cook	IL	17	17031
17031161300	Cook	IL	17	17031
17031170100	Cook	IL	17	17031
17031170200	Cook	IL	17	17031
17031170300	Cook	IL	17	17031
17031170400	Cook	IL	17	17031
17031170500	Cook	IL	17	17031
17031170600	Cook	IL	17	17031
17031170700	Cook	IL	17	17031
17031170800	Cook	IL	17	17031
17031170900	Cook	IL	17	17031
17031171000	Cook	IL	17	17031
17031171100	Cook	IL	17	17031
17031180100	Cook	IL	17	17031
17031190100	Cook	IL	17	17031
17031190200	Cook	IL	17	17031
17031190300	Cook	IL	17	17031
17031190401	Cook	IL	17	17031
17031190402	Cook	IL	17	17031
17031190601	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031190602	Cook	IL	17	17031
17031190701	Cook	IL	17	17031
17031190702	Cook	IL	17	17031
17031190800	Cook	IL	17	17031
17031190900	Cook	IL	17	17031
17031191000	Cook	IL	17	17031
17031191100	Cook	IL	17	17031
17031191200	Cook	IL	17	17031
17031191301	Cook	IL	17	17031
17031191302	Cook	IL	17	17031
17031200100	Cook	IL	17	17031
17031200200	Cook	IL	17	17031
17031200300	Cook	IL	17	17031
17031200401	Cook	IL	17	17031
17031200402	Cook	IL	17	17031
17031210100	Cook	IL	17	17031
17031210400	Cook	IL	17	17031
17031210501	Cook	IL	17	17031
17031210502	Cook	IL	17	17031
17031210601	Cook	IL	17	17031
17031210602	Cook	IL	17	17031
17031210700	Cook	IL	17	17031
17031210800	Cook	IL	17	17031
17031210900	Cook	IL	17	17031
17031220300	Cook	IL	17	17031
17031220400	Cook	IL	17	17031
17031220500	Cook	IL	17	17031
17031220601	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031220602	Cook	IL	17	17031
17031220701	Cook	IL	17	17031
17031220702	Cook	IL	17	17031
17031220901	Cook	IL	17	17031
17031220902	Cook	IL	17	17031
17031221000	Cook	IL	17	17031
17031221100	Cook	IL	17	17031
17031221200	Cook	IL	17	17031
17031221300	Cook	IL	17	17031
17031221400	Cook	IL	17	17031
17031221500	Cook	IL	17	17031
17031221600	Cook	IL	17	17031
17031222200	Cook	IL	17	17031
17031222500	Cook	IL	17	17031
17031222600	Cook	IL	17	17031
17031222700	Cook	IL	17	17031
17031222800	Cook	IL	17	17031
17031222900	Cook	IL	17	17031
17031230100	Cook	IL	17	17031
17031230200	Cook	IL	17	17031
17031230300	Cook	IL	17	17031
17031230400	Cook	IL	17	17031
17031230500	Cook	IL	17	17031
17031230600	Cook	IL	17	17031
17031230700	Cook	IL	17	17031
17031230800	Cook	IL	17	17031
17031230900	Cook	IL	17	17031
17031231100	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031231200	Cook	IL	17	17031
17031231500	Cook	IL	17	17031
17031240200	Cook	IL	17	17031
17031240300	Cook	IL	17	17031
17031240500	Cook	IL	17	17031
17031240600	Cook	IL	17	17031
17031240700	Cook	IL	17	17031
17031240800	Cook	IL	17	17031
17031240900	Cook	IL	17	17031
17031241000	Cook	IL	17	17031
17031241100	Cook	IL	17	17031
17031241200	Cook	IL	17	17031
17031241300	Cook	IL	17	17031
17031241400	Cook	IL	17	17031
17031241500	Cook	IL	17	17031
17031241600	Cook	IL	17	17031
17031242000	Cook	IL	17	17031
17031242100	Cook	IL	17	17031
17031242200	Cook	IL	17	17031
17031242300	Cook	IL	17	17031
17031242400	Cook	IL	17	17031
17031242500	Cook	IL	17	17031
17031242600	Cook	IL	17	17031
17031242700	Cook	IL	17	17031
17031242800	Cook	IL	17	17031
17031242900	Cook	IL	17	17031
17031243000	Cook	IL	17	17031
17031243100	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031243200	Cook	IL	17	17031
17031243300	Cook	IL	17	17031
17031243400	Cook	IL	17	17031
17031243500	Cook	IL	17	17031
17031250200	Cook	IL	17	17031
17031250300	Cook	IL	17	17031
17031250400	Cook	IL	17	17031
17031250500	Cook	IL	17	17031
17031250600	Cook	IL	17	17031
17031250700	Cook	IL	17	17031
17031250800	Cook	IL	17	17031
17031251000	Cook	IL	17	17031
17031251100	Cook	IL	17	17031
17031251200	Cook	IL	17	17031
17031251300	Cook	IL	17	17031
17031251400	Cook	IL	17	17031
17031251500	Cook	IL	17	17031
17031251600	Cook	IL	17	17031
17031251700	Cook	IL	17	17031
17031251800	Cook	IL	17	17031
17031251900	Cook	IL	17	17031
17031252000	Cook	IL	17	17031
17031252101	Cook	IL	17	17031
17031252102	Cook	IL	17	17031
17031252201	Cook	IL	17	17031
17031252202	Cook	IL	17	17031
17031260100	Cook	IL	17	17031
17031260200	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031260300	Cook	IL	17	17031
17031260400	Cook	IL	17	17031
17031260500	Cook	IL	17	17031
17031260600	Cook	IL	17	17031
17031260700	Cook	IL	17	17031
17031260800	Cook	IL	17	17031
17031260900	Cook	IL	17	17031
17031261000	Cook	IL	17	17031
17031270500	Cook	IL	17	17031
17031271200	Cook	IL	17	17031
17031271300	Cook	IL	17	17031
17031271400	Cook	IL	17	17031
17031271500	Cook	IL	17	17031
17031271800	Cook	IL	17	17031
17031280100	Cook	IL	17	17031
17031280400	Cook	IL	17	17031
17031280800	Cook	IL	17	17031
17031280900	Cook	IL	17	17031
17031281900	Cook	IL	17	17031
17031282700	Cook	IL	17	17031
17031282800	Cook	IL	17	17031
17031283100	Cook	IL	17	17031
17031283200	Cook	IL	17	17031
17031283800	Cook	IL	17	17031
17031290900	Cook	IL	17	17031
17031291200	Cook	IL	17	17031
17031291600	Cook	IL	17	17031
17031292200	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031292400	Cook	IL	17	17031
17031292500	Cook	IL	17	17031
17031300500	Cook	IL	17	17031
17031300600	Cook	IL	17	17031
17031300700	Cook	IL	17	17031
17031300800	Cook	IL	17	17031
17031300900	Cook	IL	17	17031
17031301100	Cook	IL	17	17031
17031301200	Cook	IL	17	17031
17031301600	Cook	IL	17	17031
17031301701	Cook	IL	17	17031
17031301702	Cook	IL	17	17031
17031301801	Cook	IL	17	17031
17031301802	Cook	IL	17	17031
17031301803	Cook	IL	17	17031
17031310200	Cook	IL	17	17031
17031310300	Cook	IL	17	17031
17031310400	Cook	IL	17	17031
17031310500	Cook	IL	17	17031
17031310600	Cook	IL	17	17031
17031310700	Cook	IL	17	17031
17031310800	Cook	IL	17	17031
17031310900	Cook	IL	17	17031
17031320101	Cook	IL	17	17031
17031320102	Cook	IL	17	17031
17031320400	Cook	IL	17	17031
17031320600	Cook	IL	17	17031
17031330101	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031330102	Cook	IL	17	17031
17031330103	Cook	IL	17	17031
17031330200	Cook	IL	17	17031
17031600600	Cook	IL	17	17031
17031760801	Cook	IL	17	17031
17031760802	Cook	IL	17	17031
17031760803	Cook	IL	17	17031
17031770201	Cook	IL	17	17031
17031770202	Cook	IL	17	17031
17031770300	Cook	IL	17	17031
17031770400	Cook	IL	17	17031
17031770500	Cook	IL	17	17031
17031770601	Cook	IL	17	17031
17031770602	Cook	IL	17	17031
17031770700	Cook	IL	17	17031
17031770800	Cook	IL	17	17031
17031770901	Cook	IL	17	17031
17031770902	Cook	IL	17	17031
17031800100	Cook	IL	17	17031
17031800200	Cook	IL	17	17031
17031800300	Cook	IL	17	17031
17031800400	Cook	IL	17	17031
17031800500	Cook	IL	17	17031
17031800600	Cook	IL	17	17031
17031800700	Cook	IL	17	17031
17031800800	Cook	IL	17	17031
17031800900	Cook	IL	17	17031
17031801000	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031801100	Cook	IL	17	17031
17031801200	Cook	IL	17	17031
17031801300	Cook	IL	17	17031
17031801400	Cook	IL	17	17031
17031801500	Cook	IL	17	17031
17031801601	Cook	IL	17	17031
17031801603	Cook	IL	17	17031
17031801605	Cook	IL	17	17031
17031801606	Cook	IL	17	17031
17031801607	Cook	IL	17	17031
17031801608	Cook	IL	17	17031
17031801701	Cook	IL	17	17031
17031801702	Cook	IL	17	17031
17031801800	Cook	IL	17	17031
17031801901	Cook	IL	17	17031
17031801902	Cook	IL	17	17031
17031802002	Cook	IL	17	17031
17031802003	Cook	IL	17	17031
17031802004	Cook	IL	17	17031
17031802100	Cook	IL	17	17031
17031802200	Cook	IL	17	17031
17031802300	Cook	IL	17	17031
17031802402	Cook	IL	17	17031
17031802403	Cook	IL	17	17031
17031802404	Cook	IL	17	17031
17031802503	Cook	IL	17	17031
17031802504	Cook	IL	17	17031
17031802505	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031802506	Cook	IL	17	17031
17031802605	Cook	IL	17	17031
17031802607	Cook	IL	17	17031
17031802608	Cook	IL	17	17031
17031802609	Cook	IL	17	17031
17031802610	Cook	IL	17	17031
17031802701	Cook	IL	17	17031
17031802702	Cook	IL	17	17031
17031802801	Cook	IL	17	17031
17031802802	Cook	IL	17	17031
17031802900	Cook	IL	17	17031
17031803005	Cook	IL	17	17031
17031803007	Cook	IL	17	17031
17031803008	Cook	IL	17	17031
17031803010	Cook	IL	17	17031
17031803012	Cook	IL	17	17031
17031803013	Cook	IL	17	17031
17031803014	Cook	IL	17	17031
17031803015	Cook	IL	17	17031
17031803016	Cook	IL	17	17031
17031803017	Cook	IL	17	17031
17031803100	Cook	IL	17	17031
17031803200	Cook	IL	17	17031
17031803300	Cook	IL	17	17031
17031803400	Cook	IL	17	17031
17031803500	Cook	IL	17	17031
17031803603	Cook	IL	17	17031
17031803604	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031803605	Cook	IL	17	17031
17031803607	Cook	IL	17	17031
17031803608	Cook	IL	17	17031
17031803611	Cook	IL	17	17031
17031803612	Cook	IL	17	17031
17031803613	Cook	IL	17	17031
17031803614	Cook	IL	17	17031
17031803615	Cook	IL	17	17031
17031803616	Cook	IL	17	17031
17031803701	Cook	IL	17	17031
17031803702	Cook	IL	17	17031
17031803800	Cook	IL	17	17031
17031803901	Cook	IL	17	17031
17031803902	Cook	IL	17	17031
17031804000	Cook	IL	17	17031
17031804102	Cook	IL	17	17031
17031804104	Cook	IL	17	17031
17031804105	Cook	IL	17	17031
17031804106	Cook	IL	17	17031
17031804108	Cook	IL	17	17031
17031804109	Cook	IL	17	17031
17031804202	Cook	IL	17	17031
17031804203	Cook	IL	17	17031
17031804204	Cook	IL	17	17031
17031804305	Cook	IL	17	17031
17031804306	Cook	IL	17	17031
17031804308	Cook	IL	17	17031
17031804309	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031804312	Cook	IL	17	17031
17031804313	Cook	IL	17	17031
17031804314	Cook	IL	17	17031
17031804315	Cook	IL	17	17031
17031804316	Cook	IL	17	17031
17031804403	Cook	IL	17	17031
17031804404	Cook	IL	17	17031
17031804405	Cook	IL	17	17031
17031804406	Cook	IL	17	17031
17031804505	Cook	IL	17	17031
17031804506	Cook	IL	17	17031
17031804508	Cook	IL	17	17031
17031804509	Cook	IL	17	17031
17031804510	Cook	IL	17	17031
17031804511	Cook	IL	17	17031
17031804512	Cook	IL	17	17031
17031804513	Cook	IL	17	17031
17031804514	Cook	IL	17	17031
17031804603	Cook	IL	17	17031
17031804606	Cook	IL	17	17031
17031804607	Cook	IL	17	17031
17031804608	Cook	IL	17	17031
17031804609	Cook	IL	17	17031
17031804610	Cook	IL	17	17031
17031804611	Cook	IL	17	17031
17031804701	Cook	IL	17	17031
17031804705	Cook	IL	17	17031
17031804706	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031804709	Cook	IL	17	17031
17031804710	Cook	IL	17	17031
17031804711	Cook	IL	17	17031
17031804712	Cook	IL	17	17031
17031804713	Cook	IL	17	17031
17031804714	Cook	IL	17	17031
17031804715	Cook	IL	17	17031
17031804716	Cook	IL	17	17031
17031804803	Cook	IL	17	17031
17031804804	Cook	IL	17	17031
17031804805	Cook	IL	17	17031
17031804806	Cook	IL	17	17031
17031804807	Cook	IL	17	17031
17031804808	Cook	IL	17	17031
17031804809	Cook	IL	17	17031
17031804810	Cook	IL	17	17031
17031804901	Cook	IL	17	17031
17031804902	Cook	IL	17	17031
17031805001	Cook	IL	17	17031
17031805002	Cook	IL	17	17031
17031805105	Cook	IL	17	17031
17031805106	Cook	IL	17	17031
17031805107	Cook	IL	17	17031
17031805108	Cook	IL	17	17031
17031805109	Cook	IL	17	17031
17031805110	Cook	IL	17	17031
17031805111	Cook	IL	17	17031
17031805112	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031805201	Cook	IL	17	17031
17031805202	Cook	IL	17	17031
17031805301	Cook	IL	17	17031
17031805302	Cook	IL	17	17031
17031805401	Cook	IL	17	17031
17031805402	Cook	IL	17	17031
17031805501	Cook	IL	17	17031
17031805502	Cook	IL	17	17031
17031805600	Cook	IL	17	17031
17031805701	Cook	IL	17	17031
17031805702	Cook	IL	17	17031
17031805801	Cook	IL	17	17031
17031805802	Cook	IL	17	17031
17031805901	Cook	IL	17	17031
17031805902	Cook	IL	17	17031
17031806001	Cook	IL	17	17031
17031806002	Cook	IL	17	17031
17031806004	Cook	IL	17	17031
17031806005	Cook	IL	17	17031
17031806006	Cook	IL	17	17031
17031806102	Cook	IL	17	17031
17031806103	Cook	IL	17	17031
17031806104	Cook	IL	17	17031
17031806201	Cook	IL	17	17031
17031806202	Cook	IL	17	17031
17031806300	Cook	IL	17	17031
17031806400	Cook	IL	17	17031
17031806501	Cook	IL	17	17031

Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
17031806502	Cook	IL	17	17031
17031806600	Cook	IL	17	17031
17031806700	Cook	IL	17	17031
17031806801	Cook	IL	17	17031
17031806802	Cook	IL	17	17031
17031806900	Cook	IL	17	17031
17031807000	Cook	IL	17	17031
17031807100	Cook	IL	17	17031
17031807200	Cook	IL	17	17031
17031807300	Cook	IL	17	17031
17031807400	Cook	IL	17	17031
17031807500	Cook	IL	17	17031
17031807600	Cook	IL	17	17031
17031807700	Cook	IL	17	17031
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Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
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Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
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Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
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Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
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Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
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Census Tract FIPS	County	State	State FIPS Code	County FIPS Code
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Appendix C: Analysis of Similarly Situated Lenders

The Bank has performed an extensive analysis of similarly situated lenders.

Centrust Small Business Lending & Community Development Peers							Small Business Loans		Community Development	
Bank	Stated Product Focus	Total Assets (\$000) 2023	Estimated FTE in AA	Latest CRA Rating	CRA Designation	AA Counties	Borrower Profile	Geographic Distribution to LMI Census Tracts	Combined CD Loans & Investments ¹⁷	Service Hours per Employee in AA
Centrust Bank (SmartBiz Loans)	Small Business and C&I Lending	154,977	30	Satisfactory	Small Bank	Portions of Cook, DuPage and Lake Counties, IL	Centrust -- 54.8% SmartBiz -- 52.7%	Centrust Low (3.2%) Moderate (15.1%) SmartBiz Low (1.6%) Moderate (4.2%)	N/A	N/A
First National Bank of Brookfield	Commercial, Real Estate, and Residential Mortgage	346,670	37	Satisfactory	Small Bank	Portions of Cook and DuPage counties, IL	76.0%	Low (3.8%) Moderate (20.3%)	N/A	N/A
Forest Park Nat'l Bank and Trust Company	Commercial Loans	311,185	49	Satisfactory	Small Bank	All of Cook county, IL	86.3%	Low (0.0%) Moderate (16.0%)	N/A	N/A
First Nations Bank	Business Banking, SBA and Construction Loans	508,851	38	Satisfactory	ISB	Cook and DuPage Counties, IL	64.3%	Low (3.6%) Moderate (7.1%)	2.4%	N/A (1 event)

¹⁷ Annualized CD activity divided by average assets as of 12/31/2023

Pan American Bank & Trust	Commercial and SBA Lending (CDFI)	491,496	59	Satisfactory	ISB	Cook and DuPage Counties, IL	51.8%	Low (5.8%) Moderate (20%)	2.7%	0.25
Gold Coast Bank	Full-Service Bank with a Commercial and SBA focus	446,760	33	Satisfactory	ISB	Cook, DuPage, Kane, Will, McHenry, and Lake Counties, IL	62.0%	Low (3.6%) Moderate (11.2%)	3.6%	N/A (3 events)
Signature Bank	Commercial Lending	1,816,139	99	Satisfactory	ISB	Cook, DuPage, Kane, Will, McHenry, and Lake Counties, IL	33.3%	Low (0.0%) Moderate (21.6%)	2.2%	0.75
Cornerstone National Bank & Trust Company	Commercial and Residential Mortgage Lending	958,275	99	Satisfactory	ISB	Entirety of DuPage and portions of Cook, Kane, Lake, and McHenry counties, IL	36.8%	Low (0.0%) Moderate (15.8%)	0.3%	9
Average							58.6%	Low (2.4%) Moderate (16%)	2.2398%	3
Median							62.0%	Low (0.0%) Moderate (16.0%)	2.4000%	0.75

Selection of Peers for Similarly Situated Lender Analysis

For this analysis, we identified banks that had the following characteristics:

- Banks regulated by the OCC or FDIC
- Had one or two offices within Cook County, IL
- Had minimal offices outside Cook County, IL
- Banks classified as either a small bank or intermediate small bank
- Offered commercial loans or small business loans as a primary product line

Geographic Distribution

Of the banks analyzed, three had no loans in low-income census tracts, and these same three banks had a median of 16.0% in moderate-income census tracts. The other banks performed much better, with a 4.2% average penetration in low-income census tracts and 14.7 % in moderate-income census tracts. The average or mean for all analyzed banks was 2.4% in low-income census tracts and 16 % in moderate-income census tracts. The median was 0.0% in low-income geographies and 16.0% in moderate-income geographies.

Borrower Profile (Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues)

The borrower profile ranged from 33.3% to 86.3%. The average was 58.6%, and the median was 62.0%. Both the average and median for peers fall below the percent of businesses in respective AA. However, peer aggregate data supports that there is a high level of competition in the area, with an average well below the similarly situated range.

New Community Development Loans and Qualified Investments

Five peers operated as an Intermediate Small Bank and had community development activity considered. These peers had a significant level of combined CD loans and qualified investments average percentage of 2.2%. A review of two large banks with similar profiles outlined above was reviewed. Once their combined CD loans and investments in the AA were annualized, they had percentages ranging from 0.8% to 1.1%. Each of these peers was rated as outstanding.

Community Development Services

Only three peers operated as an intermediate small bank and had CD service considered on a per-employee hourly basis. These peers had a mean of less than 1 hour per full-time employee in the AA. An additional two peers demonstrated an average of two qualified service activities annually and all received a satisfactory CRA rating.

Appendix D: Proof of Publication of Request for Public Comment

SmartBiz Bank solicited formal public comment on this CRA Strategic Plan by publishing notice in at least one newspaper of general circulation in the Bank's assessment area, as required by 12 C.F.R. §25.27(d)(2). This notice was published on December 12, 2025, with the public comment period expiring 30 days later. The notice was published in the Chicago Tribune, which is a newspaper of general circulation in the Bank's assessment area (see proof of publication below).

Chicago Tribune

Sold To:
SmartBiz Bank N.A. - CU80203517
385 Waukegan Road
Northbrook, IL 60062

Billed To:
SmartBiz Bank N.A. - CU80203517
385 Waukegan Road
Northbrook, IL 60062

Classified Advertising: 7907983
Purchase Order: PUBLIC NOTICE

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) years 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 ILCS 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 12/12/2025, and the last publication of the notice was made in the newspaper dated and published on 12/12/2025.

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: **Dec 12, 2025.**

Executed at Chicago, Illinois on this

13th Day of December, 2025, by

Chicago Tribune Company


Jeremy Gates

Chicago Tribune - chicagotribune.com
160 N. State Street, Chicago, IL 60601
(312) 222-2222 • Fax: (312) 222-4014

Chicago Tribune

PUBLIC NOTICE
SmartBiz Bank N.A. intends to file a Community Reinvestment Act ("CRA") Strategic Plan with the Office of the Comptroller of the Currency ("OCC") no later than thirty (30) days from the date of this Public Notice. SmartBiz Bank is requesting public comment regarding its CRA Strategic Plan pursuant to applicable regulations. The proposed CRA Strategic Plan is available for public inspection from 9:00am to 4:00pm, Monday through Friday at 385 Waukegan Road, Northbrook, IL 60062. To obtain a copy of the non-confidential portions of the proposed CRA Strategic Plan at no charge to the requesting party, individuals may request a copy by email or by mail by contacting Jacob Lang, SmartBiz Bank's CRA Officer at the address above or at jacob.lang@smartbizbank.com. All comments will be reviewed and considered in preparing the final version of the CRA Strategic Plan to be submitted to the OCC. Any person wishing to comment on the proposed CRA Strategic Plan may file comments in writing by contacting Jacob Lang, SmartBiz Bank's CRA Officer using the contact information above no later than thirty (30) days from the date of this publication.
December 12, 2025 - 7907983

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