



## **PUBLIC DISCLOSURE**

November 9, 2015

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

CenTrust Bank, National Association  
Charter Number 24617

385 Waukegan Road  
Northbrook, IL 60062

Office of the Comptroller of the Currency

1700 East Golf Road  
Suite 800  
Schaumburg, IL 60173

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

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

Summarize the major factors supporting the institution's rating.

- The bank's Loan to Deposit Ratio is reasonable.
- The bank's borrower distribution performance is reasonable.
- The bank's geographic distribution performance is reasonable.

**SCOPE OF EXAMINATION**

We evaluated Centrust's record of meeting the credit needs of its Assessment Area (AA) utilizing full scope Small Bank CRA examination procedures. The evaluation period for this evaluation is January 1, 2013 through July 31, 2015.

The primary performance assessment is the lending test, which evaluates the bank's record of meeting the credit needs of its AA through lending activities. The lending analysis includes a review of Centrust's Home Mortgage Disclosure Act (HMDA) reported residential loan originations and purchases and internally reported small business loans. Centrust is not required to report small business loans for CRA. Our small business loan sample includes all of the bank's internally reported small business loans in the amounts of \$1 million or less originated in 2013, 2014, and through July 31, 2015. We reviewed the bank's 2013 and 2014 HMDA Loan Application Registers (LAR), and HMDA data through July 31, 2015. Our analysis included testing all of the bank's HMDA data to verify the data was accurately collected, maintained, and reported in accordance with the HMDA regulation. We noted the bank made reporting errors in key fields of the 2013 and 2014 HMDA LAR, and the 2015 YTD HMDA Data. Centrust corrected all identified errors across 2013, 2014, and 2015 data, resubmitted its 2014 HMDA LAR, and updated its public file. We validated the corrected report and all HMDA data used in this evaluation is accurate and reliable.

The CRA evaluation period covers two different sets of Metropolitan Statistical Area (MSA) data, as significant changes were made effective for 2014. Our assessment included separate analysis of the bank's lending performance for all of 2013 and aggregate 2014 through July 31, 2015. We used 2010 Census data to generate demographic reports to compare Centrust's 2013, 2014, and year to date 2015 HMDA and small business lending to the corresponding census data of the AA.

We used reported Federal Deposit Insurance Corporation (FDIC) annual deposit information to determine the bank's deposit market share and market presence within its AA. The most recent FDIC deposit market share information is dated June 30, 2015. We used quarterly financial data since the last CRA evaluation to assess the loan-to-deposit (LTD) ratio. Quarterly loan and deposit data compiled for 29 quarters, from June 30, 2008 through June 30, 2015 was averaged.

As Centrust's only banking office and the majority of the bank's lending is located in the Cook County Metropolitan Division (MD), we performed a full scope analysis on the Cook County MD and a limited scope analysis on the Lake County MD. As HMDA lending is not a strategic priority for the bank and in addition, the amount of HMDA reportable lending in the bank's AA is nominal, any HMDA lending analysis would not be meaningful.

## **DESCRIPTION OF INSTITUTION**

Centrust is a \$67.1 million national bank located in Northbrook, Illinois, and is wholly owned by its Holding Company, United Community Bancshares, Inc. (UCB). The bank has only one banking office located in an upper-income census tract (CT) in Northbrook, IL, a northwest suburb of Chicago, and one ATM, located at this office site.

The bank has experienced three senior management changes, as well as two recapitalizations since the prior CRA evaluation and its strategy has changed accordingly. Whereas the bank was primarily a business and consumer lender in the past, Centrust is now primarily a commercial lender.

As of June 30, 2015, net loans and leases totaled \$45.8 million. Commercial real estate loans at approximately \$16.3 million make up 36 percent of net loans and leases while commercial and industrial loans at approximately \$15.2 million make up 34 percent of net loans and leases. Residential real estate loans, at approximately \$11.6 million make up 26 percent of the loan portfolio. One to four family mortgages at approximately \$5.1 million make up 11 percent of the loan portfolio while multifamily residential mortgages at \$2.2 million comprise approximately five percent of the loan portfolio. Home equity lines of credit (HELOCs) secured by 1-4 family residential properties at approximately \$4.4 million represent 9.77 percent of the loan portfolio. As the bank does not report HELOCs on its HMDA LAR, these were not included in our lending test analysis. Centrust does not originate agricultural loans. Consumer lending is nominal at \$38,000 or 0.08 percent of the loan portfolio.

The bank is currently under a Consent Order dated July 25, 2012, which hinders the bank's ability to fully meet the credit needs of its AA. The Consent Order placed financial constraints on the bank, requiring management to maintain minimum capital levels. Since inception of the Consent Order, management concentrated strategic efforts in maintaining capital through aggressively reducing high-balance legacy nonperforming loans, maintaining appropriate allowance for loan and lease loss balances, improving earnings, slowing overall asset growth, and ceasing payment of dividends until 2016, as defined in the bank's Strategic Plan.

In addition to the legal impediments imposed by the Consent Order, there is strong financial institution competition in the bank's AA that includes many very large and mid-size financial institutions as well as many other community banks.

The bank received a rating of “Satisfactory” at the last CRA evaluation as of June 9, 2008.

## **DESCRIPTION OF ASSESSMENT AREA**

Centrust’s current delineated AA consists of 286 CTs in the Chicago-Naperville-Elgin, IL-IN-WI MSA; 224 CTs in Cook County IL in the Chicago-Naperville-Joliet, IL MD, and 62 CTs in Lake County, IL in the Lake County-Kenosha County, IL-WI MD. Considering the bank’s size, legal and financial restrictions, operational strategies, and location of its office, the delineated AA meets the requirements of the CRA regulation in that it consists of whole geographies; does not arbitrarily exclude any low- or moderate-income areas; and does not reflect illegal discrimination.

The MSA update effective in 2014 affected and changed three of the AA’s CT income designations from 2013 to 2014; however, 2010 Census data reflecting population data did not change. None of the CTs located in the Lake County MD in the bank’s AA were affected by the MSA update. The Lake County MD contains no low-income CTs and four, or 6.45 percent, moderate-income CTs. Per 2013 MSA data, the AA consisted of two or 0.70 percent low-income CTs and 34 or 11.89 percent moderate-income CTs. The Cook County MD contained both of the AA’s only low-income CTs, which made up 0.89 percent of the MD’s CTs, and 30 or 13.39 percent moderate-income CTs. Per 2014 MSA data, the AA consisted of two or 0.70 percent low-income CTs and 32 or 11.19 percent moderate-income CTs.

According to 2010 U.S. Census data, consistent across both 2013 and 2014, the total AA population was 1,333,727 of which there were 495,210 households and 340,129 families. The AA held 532,732 housing units, of which 368,889 or 69.24 percent were owner occupied, 126,321 or 23.71 percent were occupied rental units, and 37,522 or 7.04 percent were vacant units. The median housing value was \$381,247 and median gross rent was \$1,056.

According to 2010 U.S. Census data, consistent across both 2013 and 2014, the total Cook County MD population was 1,062,999 of which there were 401,444 households and 267,814 families. The MD held 432,949 housing units, of which 291,048 or 67.22 percent were owner occupied, 110,393 or 25.50 percent were occupied rental units, and 31,508 or 7.28 percent were vacant units. The median housing value was \$358,875 and median gross rent was \$1,029.

According to 2010 U.S. Census data, consistent across both 2013 and 2014, the total Lake County MD population was 270,728 of which there were 93,769 households and 72,315 families. The MD held 99,783 housing units, of which 77,841 or 78.01 percent were owner occupied, 15,928 or 15.96 percent were occupied rental units, and 60,114 or 6.03 percent were vacant units. The median housing value was \$478,314 and median gross rent was \$1,245.

Please refer to the tables below for the AA's demographic information.

Table 1 - Assessment Area Demographic Information 2013								
Income Category	%Family Distribution	Census Tract Data Distributions						
		# Tracts	% Housing Units	% Owner Occupied Units	% Rental Occupied Units	% Single Family Units	Median Housing Value	
Low	0.77	2	1.03	0.42	2.69	0.20	154,295	
Moderate	11.41	34	14.07	8.75	27.09	8.34	216,651	
Middle	32.51	91	34.16	32.13	39.92	31.47	300,308	
Upper	55.31	157	50.74	58.71	30.29	59.98	486,021	
<b>NA</b>	<b>0.00</b>	<b>2</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0</b>	
<b>Total # or \$</b>	<b>100.00</b>	<b>286</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>381,247</b>	

Source: 2010 Census Data per CRA Wiz Demographic Data worksheets 2013

Table 1 - Assessment Area Demographic Information 2014								
Income Category	%Family Distribution	Census Tract Data Distributions						
		# Tracts	% Housing Units	% Owner Occupied Units	% Rental Occupied Units	% Single Family Units	Median Housing Value	
Low	0.77	2	1.03	0.42	2.69	0.20	154,295	
Moderate	10.53	32	13.08	7.78	26.09	7.36	219,288	
Middle	33.07	92	34.76	32.72	40.55	32.15	295,821	
Upper	55.64	158	51.13	59.09	30.66	60.28	485,336	
<b>NA</b>	<b>0.00</b>	<b>2</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0</b>	
<b>Total # or \$</b>	<b>100.00</b>	<b>286</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>381,247</b>	

Source: 2010 Census Data per CRA Wiz Demographic Data worksheets 2014

Table 1 - Cook County Demographic Information 2013								
Income Category	%Family Distribution	Census Tract Data Distributions						
		# Tracts	% Housing Units	% Owner Occupied Units	% Rental Occupied Units	% Single Family Units	Median Housing Value	
Low	0.97	2	1.27	0.53	3.08	0.27	154,295	
Moderate	12.73	30	15.37	9.82	27.60	8.79	224,389	
Middle	35.87	80	37.04	35.59	40.68	35.40	294,298	
Upper	50.43	112	46.32	54.06	28.64	55.55	460,734	
<b>NA</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0</b>	
<b>Total # or \$</b>	<b>100.00</b>	<b>224</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>358,875</b>	

Source: 2010 Census Data per CRA Wiz Demographic Data worksheets 2013

Table 1 – Cook County Demographic Information 2014							
Income Category	%Family Distribution	Census Tract Data Distributions					
		# Tracts	% Housing Units	% Owner Occupied Units	% Rental Occupied Units	% Single Family Units	Median Housing Value
Low	0.97	2	1.27	0.53	3.08	0.27	154,295
Moderate	11.60	28	14.14	8.59	26.54	7.51	228,064
Middle	36.58	81	37.79	36.34	41.40	36.29	289,337
Upper	50.85	113	46.80	54.54	29.07	55.94	460,074
<b>NA</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0</b>
<b>Total # or \$</b>	<b>100.00</b>	<b>224</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>358,875</b>

Source: 2010 Census Data per CRA Wiz Demographic Data worksheets 2014

Table 1 - Assessment Area Lake County Demographic Information 2013 and 2014 (no change)							
Income Category	%Family Distribution	Census Tract Data Distributions					
		# Tracts	% Housing Units	% Owner Occupied Units	% Rental Occupied Units	% Single Family Units	Median Housing Value
Low	0	0	0	0	0	0	0
Moderate	6.55	4	8.47	4.73	23.59	6.90	155,715
Middle	20.06	11	21.63	19.20	34.66	18.65	344,970
Upper	73.37	45	69.89	76.08	41.68	74.44	558,739
<b>NA</b>	<b>0.02</b>	<b>2</b>	<b>0.01</b>	<b>0.00</b>	<b>0.07</b>	<b>0.01</b>	<b>0</b>
<b>Total # or \$</b>	<b>100.00</b>	<b>62</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>478,314</b>

Source: 2010 Census Data per CRA Wiz Demographic Data worksheets 2013 and 2014

The unemployment rate in Cook County, in which the bank’s full scope MD is located, improved from 2013 to 2014, but remains significantly higher than the National unemployment rate per Bureau of Labor Statistics Reports. The annual average unemployment rate in Cook County was 9.6 percent in 2013 and 7.4 percent in 2014, while the National unemployment rate was 7.4 percent and 6.2 percent in 2013 and 2014, respectively.

The annual average unemployment rate in Lake County, while significantly higher than 2013 National unemployment rates, improved in 2014, and remains slightly higher than national unemployment rates. The average unemployment rate in Lake County was 8.1 percent in 2013 and 6.5 percent in 2014, while the National unemployment rate was 7.4 percent and 6.2 percent in 2013 and 2014, respectively.

Annual average unemployment data was not available for 2015 as of this Report.

Cook and Lake Counties (portions of which Centrust’s AA is located) are comprised of various types of financial institutions, significantly increasing competition for potential applicants, and limiting lending opportunities given the bank’s legal restrictions, financial condition, and location. One hundred thirty nine financial institutions operate 1,734 banking offices within the AA. The bank’s AA is saturated with multi-billion dollar institutions, which have larger market presence and capacity to lend, such as JP

Morgan Chase, BMO Harris, and Bank of America. The top five deposit market shareholders alone operate 594 banking offices and hold a total of 64 percent of the market's deposits. Centrust has only one location and is ranked 116th of 139 banks in its market, with approximately \$60 million in deposits and holding 0.02 percent of the market share as of June 30, 2015.

During our evaluation, we reviewed a community contact conducted in 2015 between our agency and a community organization that operates within Centrust's AA to discuss credit needs and opportunities for participation by local financial institutions. This organization provides health and social services to low- and moderate-income mothers primarily in the northwest suburbs of Chicago. The contact did not identify an overarching credit need within the organization's market area, but did state that community banks are doing a good job of offering budgeting classes, which has dramatically increased attendance by organization clientele. The contact stated banks could improve upon making donations to organizations that are not bank customers and that demonstrate the need for support. Despite this concern, the contact rated local bank involvement in meeting the needs of the community a "strong A."

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

**Centrust's CRA performance in meeting the lending needs of its AA is Satisfactory.**

**The LTD ratio is reasonable. The borrower distribution reflects reasonable penetration. The geographic distribution reflects reasonable dispersion.**

### **Loan-to-Deposit Ratio**

Centrust's quarterly average LTD ratio of 77 percent is reasonable. We calculated the LTD ratio based on the average of 29 quarters of financial data from June 30, 2008 through June 30, 2015. Centrust ranks 5<sup>th</sup> of eight national banks located in Cook County having assets less than \$100 million. Peer LTD quarterly averages from the same period range from 18 percent to 109 percent. The LTD is reasonable when considering its legal restrictions, size, and financial condition. Additionally, the strong competition in Centrust's market, coupled with the high unemployment rates, also significantly limits lending opportunities.

### **Lending in Assessment Area**

Centrust originated a majority of its loans outside of its AA during the evaluation period. Our sample for the lending in the AA analysis included all of the bank's business and HMDA reportable loans during the evaluation period. Forty-six percent of the number of

home mortgage and business loans originated and purchased in 2013, 2014, and through July 31, 2015 were in the AA. Forty-four percent of the number of home mortgage and business loans by dollar volume were in the AA. Centrust's primary strategic business focus since issuance of the Consent Order was to maintain its capital position and improve the asset quality of its existing loans. Loan growth was limited. Refer to Table 2 below for additional information regarding the bank's record of lending within its AA.

<b>Table 2 -- Lending in AA (\$ in thousands)</b>										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$(000)	%	\$(000)	%	
Home Mortgage	8	36	14	36	22	\$2,323	35	4,357	65	\$6,680
Business	77	48	85	52	162	23,956	46	28,650	54	52,606
Total	85	46	99	54	184	26,279	44	33,008	56	\$59287

Source: HMDA Data and Small Business Reports (2013 , 2014, and through July 31, 2015)

## **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

**Overall, the bank's distribution of lending among borrowers of different income levels reflects reasonable penetration.**

### 2013

Full Scope MD- Cook County MD: The borrower distribution in the Cook County MD reflects reasonable penetration.

We based our analysis on the number of business loans of in the amount of \$1 million or less to businesses with gross annual revenues of \$1 million or less that Centrust originated in 2013, and compared these figures to the percentage of businesses with gross annual revenues of \$1 million or less in the Cook County MD AA.

The bank's distribution of loans to small businesses reflects reasonable penetration among businesses of different sizes within the Cook County MD AA.

The bank's distribution of loans to small businesses reflects poor penetration as the percentage of loans made to businesses with reported revenues of less than \$1 million is significantly lower than the percentage of businesses in the AA with reported revenues of less than \$1 million. The bank's percentage of loans originated to businesses with unreported revenue is near to the percentage of businesses within the AA with unreported revenue. Moreover, all of the bank's loans to businesses with unreported revenue are small loans to businesses in amounts of \$155,000 or less.

Centrust held only 0.01% of the small business market share in the MD during 2013, highlighting the strong competition in its market. The bank's overall record of lending performance to businesses with reported revenues of less than \$1 million is considered reasonable when taking into account the bank's financial capacity and legal restrictions, coupled with the intense market competition in its AA.

Please refer to the table below for details.

Non-Farm Business Revenues	≤ \$1,000,000	> \$1,000,000	Unavailable / Unknown	Total
% of AA Non-Farm Businesses	71.24	6.26	22.50	100
% of Bank Loans in AA by #	33.33	50.00	16.67	100

Source: 2010 Census Data and Internal Bank Small Business Loan Reports 2013

Loan Size (000's)	Number of Loans	Percent of Number
\$0 - \$100,000	2	16.67
\$100,001 - \$250,000	4	33.33
\$250,001 - \$500,000	4	33.33
\$500,001 - \$1,000,000	2	16.67

Source: Internal Bank Small Business Loan Reports 2013

### Conclusions for Limited-Scope MD

Performance in the Lake County MD AA was not consistent with and stronger than that of the Cook County MD. The percentage of loans made to businesses with reported revenues of less than \$1 million in the Lake County MD AA is near to the percentage of businesses in the MD with reported revenues of less than \$1 million.

### 2014 and 2015

Full Scope MD- Cook County MD: The borrower distribution in the Cook County MD reflects reasonable penetration.

We based our analysis on the number of business loans in the amount of \$1 million or less to businesses with gross annual revenues of \$1 million or less that Centrust originated in 2014 and through July 31, 2015, and compared these figures to the percentage of businesses with gross annual revenues of \$1 million or less in the AA.

The bank's distribution of loans to small businesses reflects reasonable penetration among businesses of different sizes within the Cook County MD AA.

The bank’s distribution of loans made to businesses with reported revenues of less than \$1 million reflects poor penetration as the ratio is significantly lower than the percentage of businesses in the AA with reported revenues of less than \$1 million. However, when analyzing the distribution of the bank’s business loans by loan size, a majority (51.2 percent) of loans originated to businesses were in the amount of \$250,000 or less, supporting a reasonable distribution of small loans to businesses. Additionally, the bank’s percentage of loans originated to businesses with unreported revenue is near to the percentage of businesses within the AA with unreported revenue. Moreover, the majority (71%) of the loans made to businesses with unreported revenue in the AA are small loans to businesses in the amounts of less than \$200,000; of these, three, or 60 percent, are very small loans to businesses in amounts of less than \$100,000, further supporting reasonable penetration.

Centrust held only 0.04% of the small business market share in the MD during 2014, highlighting the strong competition in its AA. Market share information for 2015 was not available at the time of this analysis. The bank’s overall record of lending performance to businesses with reported revenues of less than \$1 million is considered reasonable when taking into account the bank’s financial capacity and legal restrictions, coupled with the intense market competition in its AA.

Please refer to the table below for details.

<b>Table 3 -- Borrower Distribution of Loans to Non-Farm Businesses Cook County MD 2014, 2015</b>				
Non-Farm Business Revenues	≤ \$1,000,000	> \$1,000,000	Unavailable / Unknown	Total
% of AA Non-Farm Businesses	71.41	7.01	21.57	100.00
% of Bank Loans in AA by #	41.46	41.46	17.07	100.00

Source: 2010 Census Data and Internal Bank Small Business Loan Reports 2014 and 2015 through July 31, 2015

Loan Size (000's)	Number of Loans	Percent of Number
\$0 - \$100,000	12	29.27
\$100,001 - \$250,000	9	21.95
\$250,001 - \$500,000	12	29.27
\$500,001 - \$1,000,000	8	19.51

Source: Internal Bank Small Business Loan Reports 2014 and 2015 through July 31, 2015

### Conclusions for Limited-Scope MD

Performance in the Lake County MD AA was not inconsistent with that of the Cook County MD AA.

## Geographic Distribution of Loans

**Overall, the bank’s distribution of loans in its AA among low- and moderate-income geographies reflects reasonable dispersion.**

### 2013

Full Scope MD- Cook County MD: The geographic distribution in the Cook County MD reflects reasonable dispersion.

We based our analysis on the number of small business loans that Centrust originated in 2013 in low- and moderate-income CTs and compared these figures to the percentage of businesses located in low and moderate-income CTs in the Cook County MD.

The bank’s percentage of small business loans reflects reasonable dispersion among low- and moderate-income geographies within the Cook County MD.

The bank’s percentage of loans made to businesses in the MD among low- and moderate-income CTs reflects poor dispersion based on 2013 data. Centrust did not originate loans to businesses in low-income CTs in 2013. However, only 2 or 0.89% of the bank’s CTs are in low-income CTs; only .49% of the AA’s businesses are located in these tracts. The bank also did not originate small business loans in moderate-income CTs in 2013.

Centrust held only 0.01% of small business market share in the MD during 2013, highlighting the strong competition in its AA. The bank’s overall record of lending performance to businesses in low and moderate-income CTs in 2013 is considered reasonable when taking into account the bank’s financial capacity and legal restrictions, coupled with the intense market competition in its AA.

Please refer to the table below for details.

Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Small Business	0.49	0	12.86	0	33.38	50.00	53.27	50.00

Source: 2010 Census Data and Internal Bank Small Business Loan Reports 2013

**Conclusions for Limited-Scope MD**

Performance in the Lake County MD was not consistent with and stronger than that of the Cook County MD. The percentage of small business loans the bank originated in 2013 in moderate-income CTs exceeds the number of businesses in these CTs. There are no low-income CTs in the Lake County MD.

2014 and 2015

Full Scope MD- Cook County MD: The geographic distribution in the Cook County MD reflects reasonable dispersion.

We based our analysis on the number of small business loans that Centrust originated in 2014 and through July 31, 2015 in low and moderate-income CTs and compared these figures to the percentage of businesses located in low and moderate-income CTs in the MD.

The bank’s percentage of small business loans reflects reasonable dispersion among low- and moderate-income geographies within the Cook County MD.

The percentage of small business loans originated in low-income CTs reflects excellent performance. Centrust originated 2.44 percent of its small business loans in 2014 and 2015 to businesses in low-income CTs. This percentage exceeds the percentage of AA businesses located in these CTs. The percentage of small business loans originated in moderate-income CTs reflects poor performance. Centrust originated 4.88 percent of its small business loans in 2014 and 2015 to businesses in moderate-income CTs. This percentage is significantly below the percentage of AA businesses located in these CTs.

Centrust held only 0.04% of small business market share in the MD during 2014, highlighting the strong competition in its AA. Market share information for 2015 was not available at the time of this Report. The bank’s overall record of performance in 2014 and 2015 is considered reasonable when taking into account the bank’s financial capacity and legal restrictions, coupled with the intense market competition in its AA.

Please refer to the table below for details.

<b>Table 8 - Geographic Distribution of Loans to Businesses Cook County MD 2014, 2015</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Small Business	0.48	2.44	12.52	4.88	32.81	43.90	54.19	48.78

Source: 2010 Census Data and Internal Bank Small Business Loan Reports 2014 and 2015 through July 31, 2015

### **Conclusions for Limited-Scope MD**

Small business lending performance in the Lake County MD was not inconsistent with that of the Cook County MD in 2014 and 2015.

### **Lending Gaps**

Based on the bank's size, legal restrictions, financial condition, and office location, there were no significant lending unexplained lending gaps in the delineated AA.

### **Responses to Complaints**

Centrust did not receive any written comments or complaints regarding its CRA performance during the evaluation period. The Office of the Comptroller of the Currency (OCC) has not received any CRA-related comments, complaints, or inquiries during the evaluation period.

### **Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c), in determining a national bank's (bank) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.