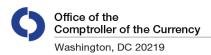
First Federal Bank of Wisconsin Community Reinvestment Act (CRA) Public File

CRA PUBLIC COMMENTS

First Federal Bank of Wisconsin has not received any comments from the public regarding our CRA activities.

CRA Performance Evaluation

This section includes February 20, 2025 OCC CRA Performance Evaluation



PUBLIC DISCLOSURE

February 20, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Bank of Wisconsin Charter Number 705313

Office of the Comptroller of the Currency

Milwaukee Field Office 1200 North Mayfair Road, Suite 200 Wauwatosa, WI 53226

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, and should not 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.

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Overall CRA Rating

Institution's CRA Rating: First Federal Bank is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is more than reasonable given the bank's size, financial condition, and the credit needs of its assessment area (AA).
- A substantial majority of loan originations are made within the bank's AA.
- The borrower distribution of loans reflects reasonable distribution among businesses of different sizes.
- The geographic distribution of businesses loans reflects excellent distribution among geographies.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is more than reasonable.

The bank's quarterly LTD ratio averaged 90.70 percent over the 13 quarters from December 31, 2020, to December 31, 2023. The bank ranks fifth in a peer group which includes 13 other similarly situated banks with peer bank LTD ratios ranging from 60.16 percent to 128.41 percent in the specified time period. The banks in this peer group have total assets ranging from \$23.7 million to \$4.1 billion.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs.

2021

The bank originated and purchased 95.5 percent of its total loans by number and 90.5 percent of its total loans by dollar inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. See chart below for additional detail.

Lending Inside and Outside of the Assessment Area 2021											
		Number	of Loans		Total	Dollar	Amount	of Loans \$((000s)		
Loan Category	Ins	side	Outs	Outside		Inside		Outside		Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)	
Small Business	21	95.45	1	4.55	22	4,764	90.50	500	9.50	5,264	
Total	21	95.45	1	4.55	22	4,764	90.50	500	9.50	5,264	

2022-2023

The bank originated and purchased 100 percent of its total loans by number and 100 percent of its loans by dollar inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. See chart below for additional detail.

Lending Inside and Outside of the Assessment Area 2022-2023											
]	Number (of Loans			Dollar A					
Loan Category	Insi	de	Outside		Total	Inside		Outside		Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)	
Small Business	46	100.00	0	0	46	7,513	100.00	0	0	7,513	
Total	46	100.00	0	0	46	7,513	100.00	0	0	7,513	

Description of Institution

First Federal Bank of Wisconsin (First Fed) is a \$325 million covered saving association established in 1922 and wholly owned by Ffbw, Inc. First Fed is headquartered in Waukesha, Wisconsin and operates out of six branches: two located in Waukesha, WI, three located in Milwaukee, WI, and one located in Brookfield, WI. The bank's newest branch opened in Milwaukee near Menomonee Falls in June 2022. The bank closed one branch in New Berlin in April 2021. First Fed focuses primarily on commercial lending products and has recently exited the residential mortgage market. The bank is now including all of Waukesha County and all of Milwaukee County for their AA.

First Fed is a full-service bank offering a variety of traditional loan and deposit products. The bank's primary lending focus is commercial lending. As of September 30, 2024, the loan portfolio is comprised of 80.1 percent commercial loans and 19.9 percent residential real estate loans.

The bank also received positive consideration for its response to the COVID-19 pandemic in 2021 through the origination of loans through the SBA Paycheck Protection Program (PPP). These loans helped to stabilize small businesses and communities in the AA and statewide areas. The bank originated 125 PPP loans totaling \$8.0 million in 2021.

There are no legal or financial impediments limiting the bank's ability to meet the credit needs of the AA. First Fed's last CRA evaluation was dated February 14, 2022, and the bank received a Satisfactory rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated First Fed's performance using the Small Bank procedures. The Lending Test assesses the bank's record of meeting the credit needs of its AA through lending activities during the evaluation period of January 1, 2021, through December 31, 2023. We reviewed the data for the bank's primary loan product, commercial loans, to evaluate the bank's lending performance.

To assess lending, we used data from the bank reports and a random sample of loans for the primary product originated or purchased in the bank's AA. Our lending analysis used the most recent available demographic and aggregate peer lending data.

To provide more current and accurate demographic data, the federal banking agencies are now updating census data every five years instead of ten, beginning with the Census Bureau's 2015 American Community Survey (ACS). The most recent update was in 2020. First Fed's AA was affected by this change, and 2021 lending data received a separate analysis from 2022-2023 lending data. As a result, performance tables have been split and include 2021 separately and 2022 through 2023 combined. Data is discussed in the applicable narrative sections of the evaluation.

Selection of Areas for Full-Scope Review

Given the bank only has one AA, we reviewed this metropolitan statistical area (MSA) using full-scope procedures.

Ratings

The bank's overall rating is based primarily on those areas that receive full-scope reviews.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Wisconsin

CRA rating for the State of Wisconsin: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The borrower distribution of loans reflects reasonable distribution among business of different sizes.
- The geographic distribution of business loans reflects excellent distribution among geographies.
- There were no CRA related complaints during the evaluation.

Description of Institution's Operations in Wisconsin

The bank has one AA located in the state of Wisconsin. The Milwaukee-Waukesha, WI MSA AA includes all of Waukesha County and all of Milwaukee County. The AA complies with regulatory requirements and does not arbitrarily exclude any low- and moderate-income (LMI) geographies.

According to the Census Bureau's 2015 ACS, the bank's AA comprised of 384 census tracts (CTs) in 2021. For the period of 2022-2023, there were 400 CTs. There are no CTs listed as distressed or underserved for the AA in the 2021-2023 review period.

According to the FDIC Deposit Market Share Report, as of June 30, 2024, there is a significant competition within the AA. First Fed ranks 24th in total deposits and has an overall market share of 0.35 percent. The balance of the market share is divided among 39 other financial institutions, ranging from 0.01 percent to 34.20 percent.

Employment and Economic Factors

Major employers in the AA include industries focused in manufacturing, health, and retail. Some of the major employers in the area are Northwestern Mutual, Kohls, Advocate Aurora, Milwaukee Tool, Harley Davidson, and Rockwell Automation. Unemployment in the bank's AA is in line with statewide unemployment data. Overall, the local and state economies are characterized as stable with an overall higher percentage in income than regional and national averages.

Community Contact

We reached out to a community contact regarding information for the AA. Affordable housing continues to be a need in the community, and home inventory remains low. Wages are competitive with employment available in the area. There are several affordable housing areas being developed, but with high competition from other nonprofits in the area. Overall, Waukesha County is a high-income county with moderate-income CTs.

Table A – I	Demographi	c Information	of the Assess	ment Area		
	Assessment	t Area: First F	ederal 2021			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	384	25.8	17.7	28.9	27.1	0.5
Population by Geography	1,349,812	19.4	17.3	29.7	33.6	0.0
Housing Units by Geography	579,579	18.6	17.5	31.5	32.3	0.0
Owner-Occupied Units by Geography	308,791	8.9	14.5	32.0	44.5	0.0
Occupied Rental Units by Geography	227,915	27.8	21.7	32.7	17.7	0.0
Vacant Units by Geography	42,873	39.6	16.9	21.2	22.3	0.0
Businesses by Geography	79,737	13.7	14.2	31.3	40.8	0.1
Farms by Geography	1,496	9.2	10.7	28.5	51.6	0.0
Family Distribution by Income Level	325,894	25.7	16.3	19.0	39.0	0.0
Household Distribution by Income Level	536,706	26.9	15.8	17.0	40.3	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$71,764	Median Hous	ing Value		\$179,269
			Median Gross	\$840		
	ow Poverty L	Level	12.6%			

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Der	mographic Iı	nformation	of the Assessn	nent Area						
A	ssessment A	rea: First F	ederal 2023							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #				
Geographies (Census Tracts)	400	20.3	19.8	30.3	27.5	2.3				
Population by Geography	1,346,467	15.0	18.2	32.0	33.6	1.2				
Housing Units by Geography	586,013	14.8	18.7	33.6	31.8	1.1				
Owner-Occupied Units by Geography	310,203	6.7	14.7	35.8	42.6	0.2				
Occupied Rental Units by Geography	233,280	22.6	24.0	32.4	19.1	1.9				
Vacant Units by Geography	42,530	30.9	19.3	24.6	22.1	3.0				
Businesses by Geography	142,264	12.7	17.7	30.4	38.4	0.8				
Farms by Geography	2,475	10.4	13.7	29.7	46.0	0.2				
Family Distribution by Income Level	322,061	24.3	17.0	19.9	38.7	0.0				
Household Distribution by Income Level	543,483	26.5	16.0	17.3	40.2	0.0				
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$84,829	Median Housi	ng Value		\$200,665				
			Median Gross	Rent		\$948				
	Families Below Poverty Level									

Source: 2020 U.S. Census and 2023 D&B Data

Due to rounding, totals may not equal 100.0%

Scope of Evaluation in Wisconsin

The Wisconsin state rating is based on the results of the full-scope review of the Milwaukee-Waukesha MSA AA. Since this is the only AA, it received a full-scope review.

LENDING TEST

The bank's performance under the Lending Test in Wisconsin is rated Satisfactory.

Conclusions for Area Receiving a Full-scope Review

Based on a full-scope review, the bank's performance in the Milwaukee-Waukesha MSA is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state of Wisconsin.

2021

Small Loans to Businesses

Refer to table Q in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

^(*) The NA category consists of geographies that have not been assigned an income classification.

The borrower distribution of loans reflects reasonable distribution among geographies. The bank originated 9.5 percent of business loans in low-income geographies. The percent of the bank's originated loans is below the demographic that indicate 13.7 percent of AA businesses are in low-income geographies and is below the aggregate peer lending data in the low-income geographies of 12.5 percent. The bank originated 9.5 percent of business loans in moderate-income geographies. The percent of the bank's originated loans is below the demographics that indicate 14.2 percent of AA businesses are in moderate-income geographies and is also below the peer lending data in the moderate-income geographies of 12.9 percent.

2022-2023

Small Loans to Businesses

Refer to table Q in the state of Wisconsin section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of loans reflects poor distribution among geographies. The bank originated 4.3 percent of business loans in low-income geographies. The percent of the bank's originated loans is below the demographics that indicate 12.7 percent of AA businesses are in low-income geographies and is below the aggregate peer lending data in the low-income geographies of 8.7 percent. The bank originated 6.5 percent of business loans in moderate-income geographies. The percent of the bank's originated loans is below the demographics that indicate 17.7 percent of AA businesses are in moderate-income geographies and is below the aggregate peer lending data in the moderate-income geographies of 16.1 percent.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to businesses of different sizes.

2021

Small Loans to Businesses

Refer to table R in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of loans reflects reasonable distribution amount businesses of different sizes. The bank originated 77.5 percent of its business loans to AA small businesses (businesses with gross annual revenue of \$1.0 million or less). This percentage of loans to small businesses is less than the percentage of small businesses in the AA, which is 80.6 percent of total businesses. The percentage of bank loans to small businesses exceeds the aggregate lending data, which shows 51.1 percent of peer business lending in the AA was to small businesses.

2022-2023

Small Loans to Businesses

Refer to table R in the state of Wisconsin section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The borrower distribution of loans reflects excellent distribution among businesses of different sizes. The bank originated 95.3 percent of its business loans to AA small businesses. This percentage of loans to small businesses exceeds the percentage of small businesses in the AA, which is 88.0 percent of total businesses. The percentage of bank loans to small businesses exceeds the aggregate lending data which shows 53.2 percent of peer business lending in the AA was to small businesses.

Responses to Complaints

There were no consumer complaints regarding the bank's CRA performance, nor any indicating illegal or discriminatory lending practice within this evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

Time Period Reviewed:	January 1,2021 through Decer	mber 31, 2023
Bank Products Reviewed:	Small Business Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type o	f Examination	
Rating and Assessment Areas	Type of Exam	Other Information
Milwaukee-Waukesha, WI MSA	Full-scope	All of Waukesha County and all of Milwaukee County

Appendix B: Summary of MMSA and State Ratings

RATINGS F	irst Federal Bank of Wisconsin
Overall Bank:	Lending Test Rating
First Federal Bank of Wisconsin	Satisfactory
State:	
Wisconsin	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (**MFI**): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- **Table O.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- **Table P.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- **Table Q.** Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- **Table S.** Assessment Area Distribution of Loans to Farms by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- **Table U.** Assessment Area Distribution of Consumer Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Tab	le O: Assessment Arc	ea Distribution of Loa	ns to Small Business	es by Income Catego	ory of the Geography
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2021

	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts			Not Available- Income Tracts					
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggre- gate	% Businesses	% Bank Loans	Aggre- gate	% Businesses	% Bank Loans	Aggre- gate	% Businesses	% Bank Loans	Aggre- gate	% Businesses	% Bank Loans	Aggre- gate
First Federal 2021	22	5,264,505	100	30,813	13.7	9.5	12.5	14.2	9.5	12.9	31.3	42.9	30.8	40.8	38.1	43.8	0.1	0	0.0
Total	22	5,264,505	100	30,813	13.7	9.5	12.5	14.2	9.5	12.9	31.3	42.9	30.8	40.8	38.1	43.8	0.1	0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

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

2022-23

												_							
Total Loans to Small Businesses			mall	Low-Income Tracts			Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		me	Not Available- Income Tracts		-			
Assessment Area:	#	\$		Overall Market	% Businesses	кяпк	Aggre- gate	% Businesses	% Bank Loans	Aggre- gate	% Businesses	% Bank Loans	Aggre- gate	% Businesses	% Bank Loans	Aggre- gate	% Businesses	% Bank Loans	Aggre- gate
First Federal 2023	46	7,512,502	100	28,924	12.7	4.3	8.7	17.7	6.5	16.1	30.4	54.4	31.2	38.4	34.8	43.3	0.8	0	0.6
Total	46	7,512,502	100	28,924	12.7	4.3	8.7	17.7	6.5	16.1	30.4	54.4	31.2	38.4	34.8	43.3	0.8	0	0.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessmen	t Area Distribution of Loans to Small Bu	isinesses by Gross Annual Revenues		2021
	Total Loans to Small Businesses	Businesses with Revenues <= 1MM	Businesses with	Businesses with Revenues Not

	Total 1	Loans to Sm	all Busine	sses	Businesses wi	th Revenu	es <= 1MM	Revenues > 1		Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
First Federal 2021	22	5,264,505	100	30,813	80.6	77.5	51.1	7.9	22.5	11.6	0
Total	22 5,264,505 100 30,813				80.6	77.5	51.1	7.9	22.5	11.6	0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2022-23

	Total Loans to Small Businesses		Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
First Federal 2023	46	7,512,502	100	28,924	88.0	95.3	53.2	4.2	4.7	7.8	0
Total	46	7,512,502	100	28,924	88.0	95.3	53.2	4.2	4.7	7.8	0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

List of Branches



Branches Location and Hours including census tract information

Waukesha East Office 1617 E. Racine Avenu Waukesha, WI 53186		<u>MSA</u> 33340	State Code 55	<u>County</u> <u>Code</u> 133	Census Tract 2024.00
Hours of Operation: Monday-Friday*	9:00am - 5:00pm	Lobby & Drive Up	Saturday*	9:00am - 12:00pm	Lobby & Drive Up
Waukesha West Office 1801 Summit Avenue Waukesha, WI 53188		33340	55	133	2031.02
Hours of Operation: Monday-Friday*	9:00am - 5:00pm	Lobby & Drive-Up	Saturday	Closed	
Bay View Office 3974 S. Howell Avenu Milwaukee, WI 53207		33340	55	79	0209.00
Hours of Operation: Monday-Friday*	9:00am - 5:00pm	Lobby & Drive-Up	Saturday	Closed	
Brookfield Office 1360 S. Moorland Roa Brookfield, WI 53005	ad	33340	55	133	2011.02
Hours of Operation: Monday-Friday*	9:00am - 5:00pm	Lobby & Drive-Up	Saturday	Closed	
Mitchell Street Office 1039 Historic W Mitch Milwaukee, WI 53204	nell Street	33340	55	79	0167.00
Hours of Operation: Lobby Monday-Friday*	9:00am - 5:00pm	Lobby	Saturday 24/7 ATM I	Closed .ocated on the side of th	ne building on 11th St.
Mitchell Street Drive 1720 S 11th St Milwaukee, WI 53204		33340	55	79	0167.00
Hours of Operation: Lobby Monday-Friday*	9:00am - 5:00pm	Lobby & Drive-Up	Saturday*	9:00am - 12:00pm	Lobby & Drive-Up
Milwaukee Office 11801 W. Silver Sprin Milwaukee, WI 5322		33340	55	79	0004.00
Hours of Operation: Monday-Friday* By Appointment Only	10:00am - 3:00pm - Lobby during norn		Saturday -F 10am-3pm	Closed n)	

Branch Openings and Closings during the current year and the prior two calendar years



Branch Openings and Closings during the current year and the prior two calendar years

no changes in 2023 - 2025





Products and Services

Deposit Services

- Checking Accounts Money Market Accounts
- Certificates of Deposit
- Savings Accounts
- **Custodial Accounts**
- Health Savings Accounts (HSAs)
- **IRAs**
- **IOLTAs**
- **Debit Cards**
- E-statements
- Online Banking (Retail & Business)
- Online Bill Pay
- Mobile Banking Mobile Deposit Capture
- Mobile Wallet

 - o Apple Pay
 o Samsung Pay
 o Google Pay
 o Fitbit Pay

 - Garmin Pay 0
- Zelle
- Wire Transfers
- **Direct Deposit**
- Night Deposit
- Credit Cards
- Automatic Payments/Transfers
- Cash Advance Services
- **Overdraft Protection**
- Official Checks
- Safe Deposit Box at Mitchell Street only
- Notary Services
- Coin Counting
- ITIN services

Loan and Commercial Services

- **Commercial Construction Loans**
- Working Capital Lines of Credit Commercial Real Estate Loans Equipment Loans

- Consumer Loans Unsecured Term Notes
- Consumer Overdraft Line of Credit
- Business Deposit Accounts (Checking, Savings, Money Market) Municipal Deposit Accounts (Checking, Money Market)
- Business Loans, Lines of Credit, SBA Loans
- Corporate Credit Cards
- Sweep Accounts
- Remote Item Capture
- Zero Balance Accounts
- **ACH Transactions**
- **Lockbox Services**
- Bill Pay
- Positive Pay
- Merchant Services



FEE SCHEDULE EFFECTIVE 08/01/2024

	FEE SCHEDULE EFFECTIVE 08/01/2024	
Account Early Cl	osure Fee (within 90 days)	\$50.00
Account Research	ch (per hour, \$30 minimum)	\$50.00
Bill Pay Next Da	y Draft Check Fee	\$14.95
Bill Pay Same Da	ay Electronic Fee (qualified vendors only)	\$9.95
Check Cashing (non-customer)	\$10.00
Check Copy (on	paper)	\$2.00
Checks - tempo	rary (per sheet of 4)	\$4.00
Check Images re	eturned with statement (monthly)	\$5.00
Collection Items	(plus expenses)	\$29.00
Coin counting (\$	100 and more)	2% of total
Copies (per page	e)	\$1.00
Credit card payr	ment processing	\$3.00
Debit Card Repla	acement	\$10.00
Expedited Card	Service	\$40.00
Excessive Transa	action Fee (per item over 6 preauthorized transactions)	\$15.00
Foreign Check D		\$15.00*
Foreign Currenc	y Fee (buy or sell)	\$35.00
_	e (monthly fee per account using paper statements)	\$5.00
	necking/Savings Account (monthly, after 6 months with no activity)**	\$5.00
International AC		\$10.00
International AC	CH Returned	\$15.00
IRA/HSA Extern		\$35.00
ITIN Application		\$75.00***
Levies/Garnishn		\$100.00
Non-Sufficient F		\$25.00
Official Checks	,	\$8.00
Overdraft Prote	ction (per transfer)	\$10.00
	item; max. 3 per day)	\$35.00
Overdrafts Cons		\$5.00
	sit Item (commercial customers only)	\$10.00
Returned Loan I	·	\$20.00
Safe Deposit Box	•	\$15.00
	3x5	\$20.00
	5x5	\$30.00
	3x10	\$35.00
	4x10	\$50.00
	Late charge (per month)	\$7.50
	Drilling Fee	At cost
	Key Replacement	At cost
Statement Conv		\$5.00
Statement Copy Stop Payment	(OII paper)	\$35.00 \$35.00
Telephone Tran	sfor	\$5.00
•	omestic (incoming)	\$5.00 \$15.00
	· •	\$15.00
Wire Transfer Domestic (outgoing) Wire Transfer International (incoming)		\$20.00
	`	·
	eternational (outgoing, in US Dollars)	\$50.00
	eternational (outgoing, in foreign currency)	\$65.00
	race/Service Request (domestic)	\$35.00
	race/Service Request (international)	\$50.00
	eturned (domestic)	\$35.00*
	eturned (international)	\$50.00*

^{*} Additional processing fees charged by other banks may apply
** Inactivity fees apply after 6 months of no customer-initiated activity for checking, money market and savings accounts with a balance under \$1,000 and after 13 months of no customerinitiated activity for HSA and HSA Money Market accounts with a balance under \$100

^{***} checking and savings account required

COMMERCIAL DEPOSIT FEES					
	Commercial	Community	Business		
	Checking	Checking	Checking		
Domestic Outgoing Wires	\$35.00	\$35.00	\$35.00		
Domestic Outgoing Wires (with Wire Manager)	\$15.00	\$15.00	\$15.00		
Domestic Incoming Wires	\$15.00	\$15.00	\$15.00		
International Wire Transfers (outgoing, in USD, Wire	\$35.00	\$35.00	\$35.00		
Manager)					
International Wire Transfers (outgoing, in USD)	\$50.00	\$50.00	\$50.00		
International Wire Transfers (outgoing, in foreign	\$65.00	\$65.00	\$65.00		
currency)					
International Incoming Wires	\$20.00	\$20.00	\$20.00		
Maintenance Charge	\$15.00	\$10.00*	No Charge		
		* Waived for nonprofits			
		with IRS Tax Exempt status			
Each Transaction Item & Each Deposited Item	\$0.18	\$0.18	\$0.18		
		(after 500)	(after 250)		
		(after 500)	(after 250)		

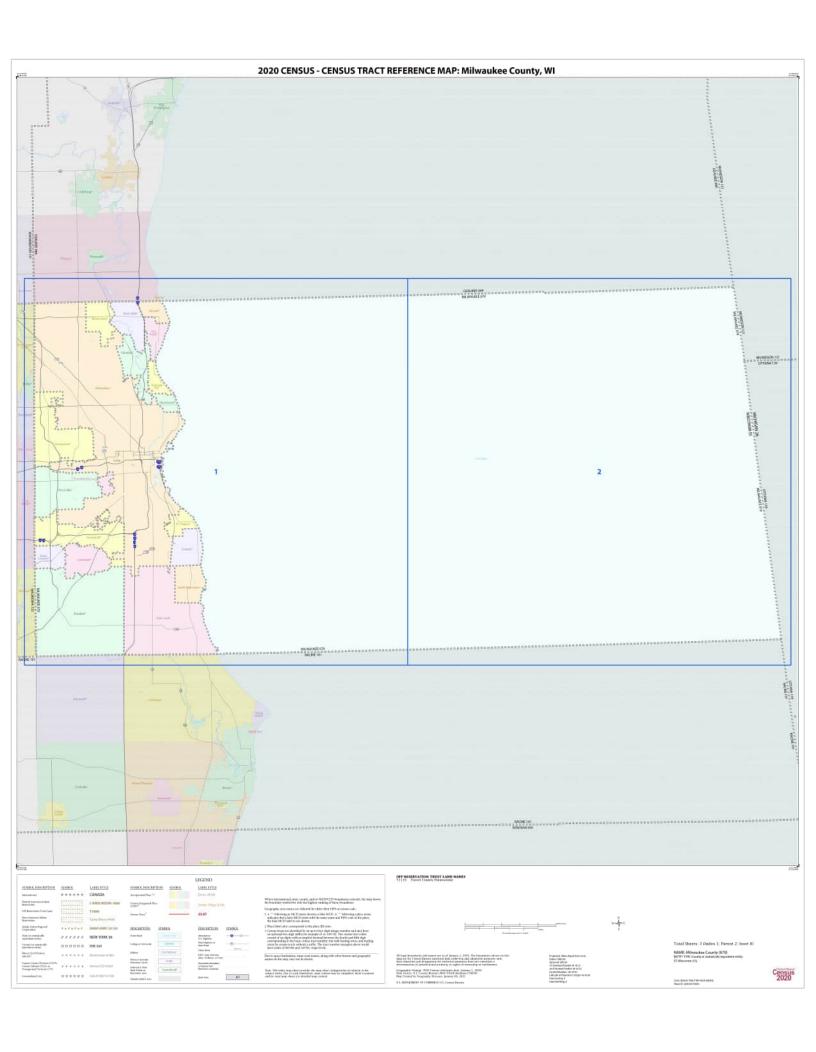
CASH MANAGEMENT PRODUCTS					
ACH Manager	\$50.00/month				
ACH Manager with Same Day ACH	\$100.00/month				
ACH Returned Item	\$15.00 (first) / \$20.00 (second) / \$25.00 (third and subsequent)				
ACH Notice of Change (NOC) Item	\$15.00				
Business Online Banking (per token user)	\$5.00				
Cash Deposit Services per account	30 cents per \$100 over \$10,000/month				
Collateralized Deposits	.10 on rate				
Commercial Night Drop	No Charge				
Corporate HSA Processing (per corporate contribution)	\$50.00				
EFT Reassociation Statement (monthly)	\$5.00				
Positive Pay for Check and ACH	\$75.00/month				
Positive Pay for Check or ACH	\$50.00/month				
Remote Deposit Capture	\$50.00/month				
Sweeps	\$50.00/month				
Wire Manager	\$50.00/month (\$15 per domestic wire / \$35 per int'l)				
Zero Balance Account (ZBA) Sweeps	\$25.00/month				

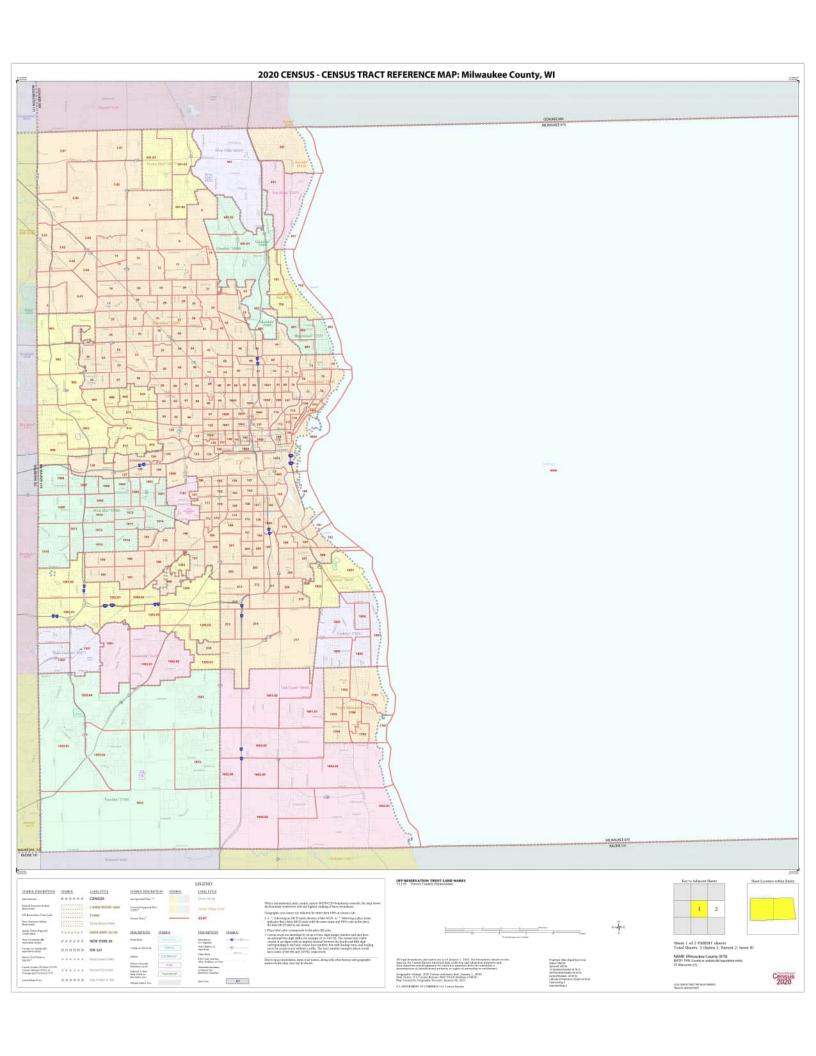
COMMERCIAL LOAN CLOSING FEES				
Loan Payoff Fee (administrative, not prepayment fee)	\$150.00			
Loan Documentation Fee (minimum)	\$500.00			
Origination Fee	Varies			

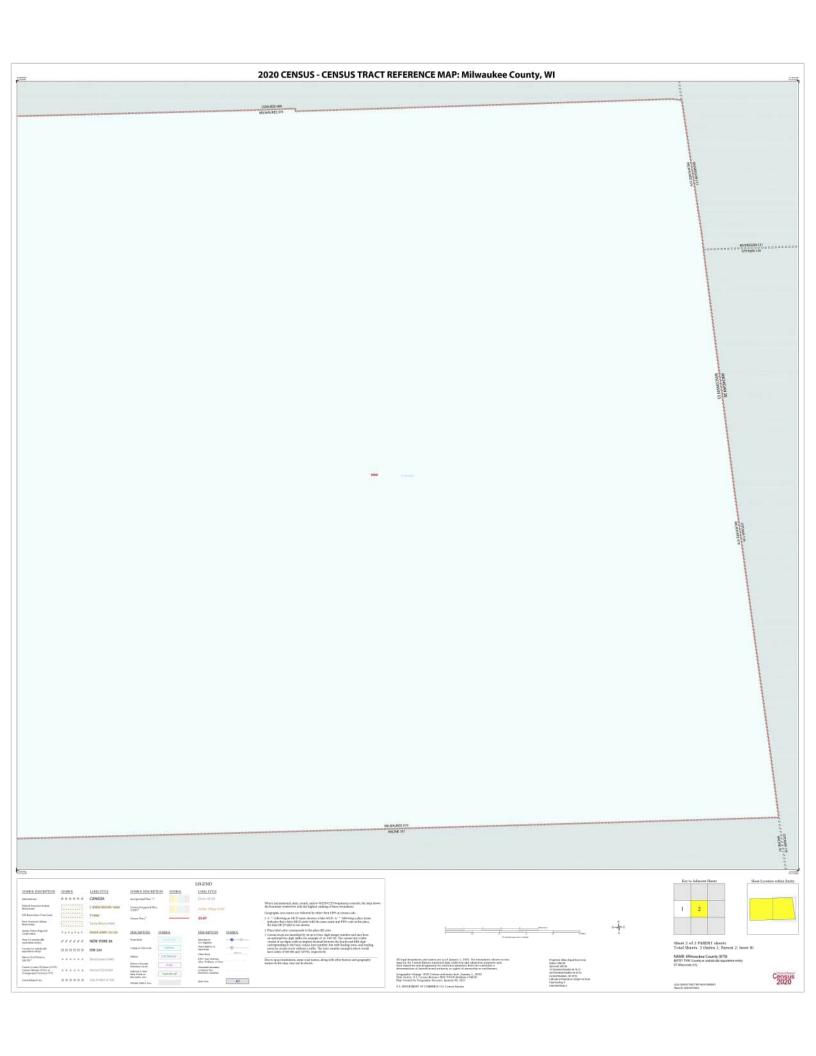
CONSUMER LOAN FEES	
Advance Fee - Overdraft Line of Credit	\$10.00
Annual Fee-Unsecured Line of Credit	\$30.00
Annual Fee-Home Equity Line of Credit	\$50.00
External Payoff Request	\$35.00

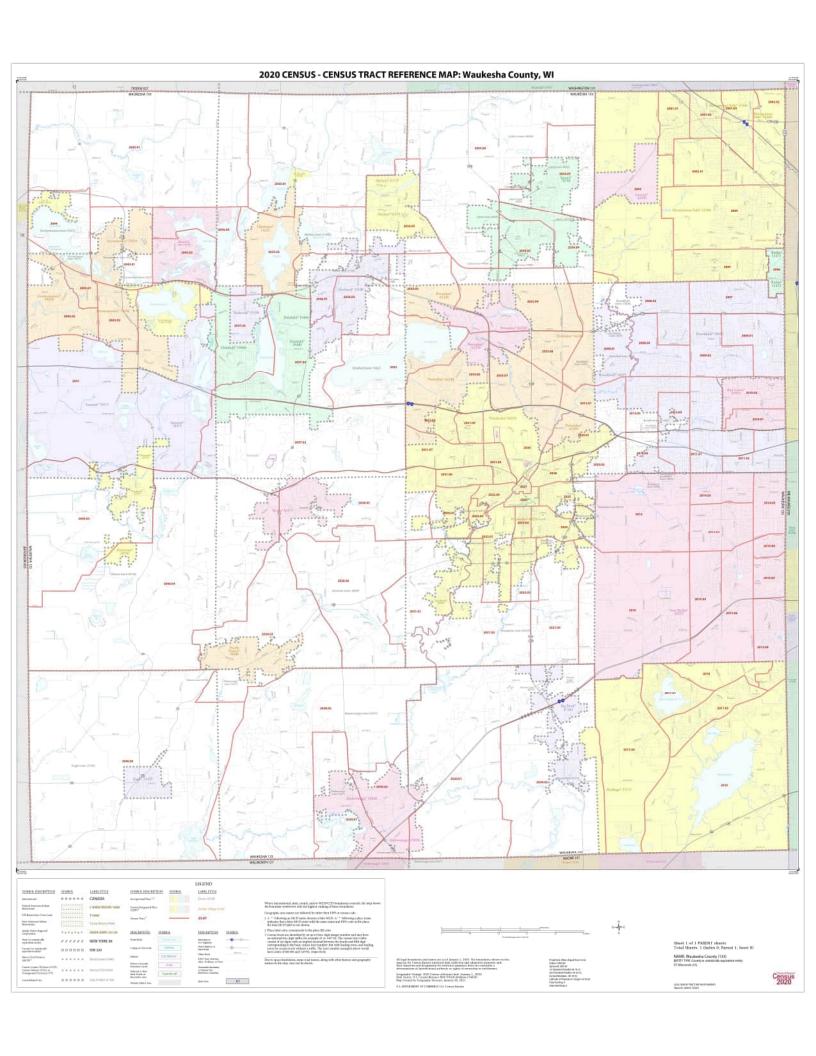
RESIDENTIAL LOAN FEES	
External Payoff Request	\$35.00
Loan Modification - Matured Portfolio Loan	\$300.00

Assessment Area All of Milwaukee County and Waukesha County









Milwaukee County 55079004300;55;079;43.00 55079009400;55;079;94.00 55079000101;55;079;1.01 55079004400;55;079;44.00 55079009500;55;079;95.00 55079000102;55;079;1.02 55079004500;55;079;45.00 55079009600;55;079;96.00 55079000201;55;079;2.01 55079004600;55;079;46.00 55079009700;55;079;97.00 55079000202;55;079;2.02 55079004700;55;079;47.00 55079009800;55;079;98.00 55079000301;55;079;3.01 55079004800;55;079;48.00 55079009900;55;079;99.00 55079000302;55;079;3.02 55079004900;55;079;49.00 55079010600;55;079;106.00 55079000303;55;079;3.03 55079005000:55:079:50.00 55079010700;55;079;107.00 55079000304;55;079;3.04 55079005100;55;079;51.00 55079010800;55;079;108.00 55079000400;55;079;4.00 55079005200;55;079;52.00 55079011000;55;079;110.00 55079000501;55;079;5.01 55079005300;55;079;53.00 55079011100;55;079;111.00 55079000502;55;079;5.02 55079005400;55;079;54.00 55079011200;55;079;112.00 55079000600:55:079:6.00 55079005500;55;079;55.00 55079011300;55;079;113.00 55079000700;55;079;7.00 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Waukesha County

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Loan to Deposit Ratio Information



2024 Quarterly Loan to Deposit Ratios

March 31, 2024 104.73

June 30, 2024 104.84

September 30, 2024 102.57

December 31, 2024 106.38