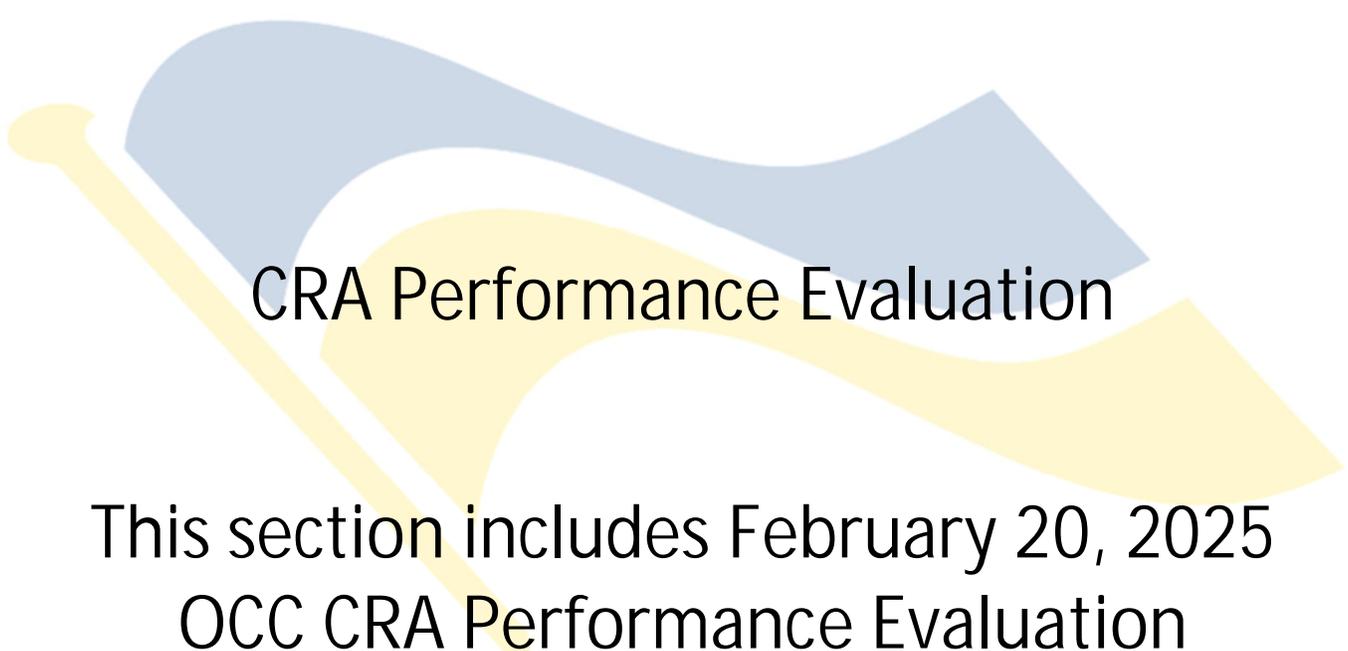


First Federal Bank of Wisconsin
Community Reinvestment Act (CRA)
Public File



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										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
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										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
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 – Demographic Information of the Assessment Area						
Assessment Area: First Federal 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 Housing Value			\$179,269
			Median Gross Rent			\$840
			Families Below Poverty Level			12.6%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: First Federal 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 Housing Value			\$200,665
			Median Gross Rent			\$948
			Families Below Poverty Level			9.9%
<i>Source: 2020 U.S. Census and 2023 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

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 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 December 31, 2023	
Bank Products Reviewed:	Small Business Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of 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	First 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.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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 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: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% 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	
<i>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%</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-23
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% 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	
<i>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%</i>												

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.

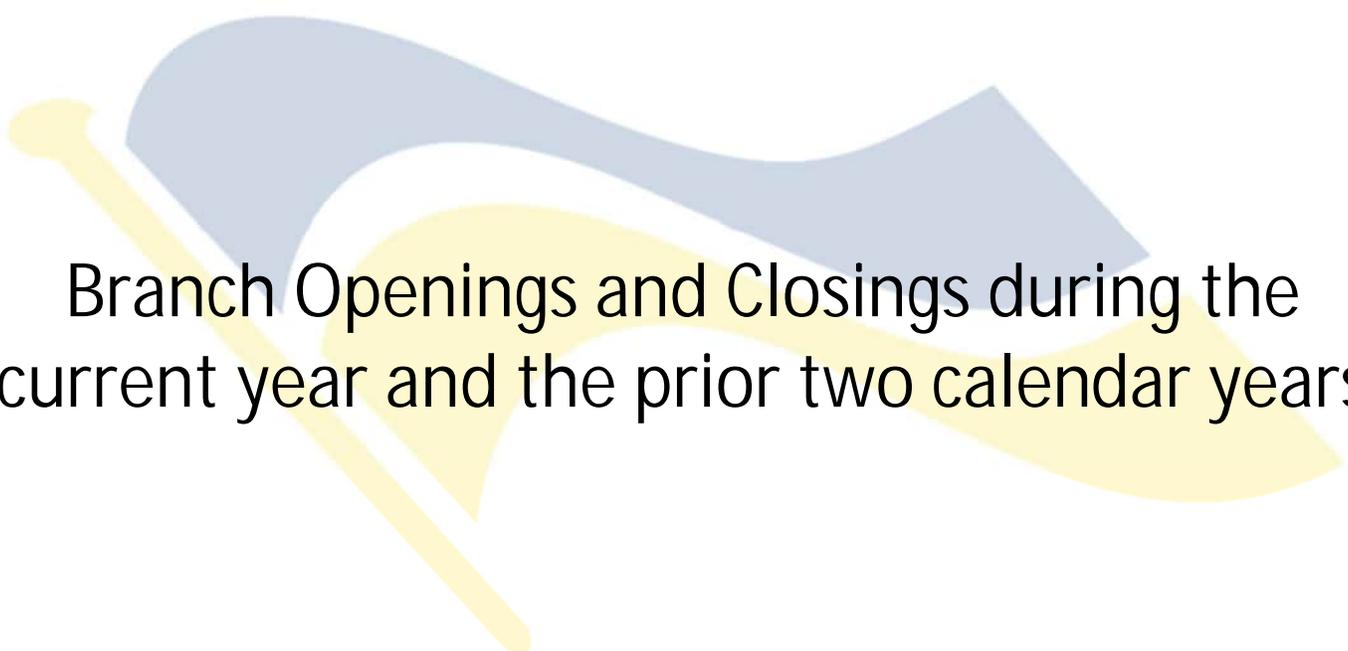


List of Branches



Branches Location and Hours including census tract information

<u>Branch Name</u>	<u>MSA</u>	<u>State Code</u>	<u>County Code</u>	<u>Census Tract</u>
<u>Waukesha East Office</u> 1617 E. Racine Avenue Waukesha, WI 53186	33340	55	133	2024.00
Hours of Operation: Monday-Friday* 9:00am - 5:00pm Lobby & Drive Up Saturday* 9:00am - 12:00pm Lobby & Drive Up				
<u>Waukesha West Office</u> 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				
<u>Bay View Office</u> 3974 S. Howell Avenue Milwaukee, WI 53207	33340	55	79	0209.00
Hours of Operation: Monday-Friday* 9:00am - 5:00pm Lobby & Drive-Up Saturday Closed				
<u>Brookfield Office</u> 1360 S. Moorland Road Brookfield, WI 53005	33340	55	133	2011.02
Hours of Operation: Monday-Friday* 9:00am - 5:00pm Lobby & Drive-Up Saturday Closed				
<u>Mitchell Street Office</u> 1039 Historic W Mitchell Street Milwaukee, WI 53204	33340	55	79	0167.00
Hours of Operation: Lobby Monday-Friday* 9:00am - 5:00pm Lobby Saturday Closed 24/7 ATM Located on the side of the building on 11th St.				
<u>Mitchell Street Drive Services</u> 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				
<u>Milwaukee Office</u> 11801 W. Silver Spring Dr. Milwaukee, WI 53225	33340	55	79	0004.00
Hours of Operation: Monday-Friday* 10:00am - 3:00pm Drive-Up only Saturday Closed By Appointment Only - Lobby during normal branch hours (M-F 10am-3pm)				

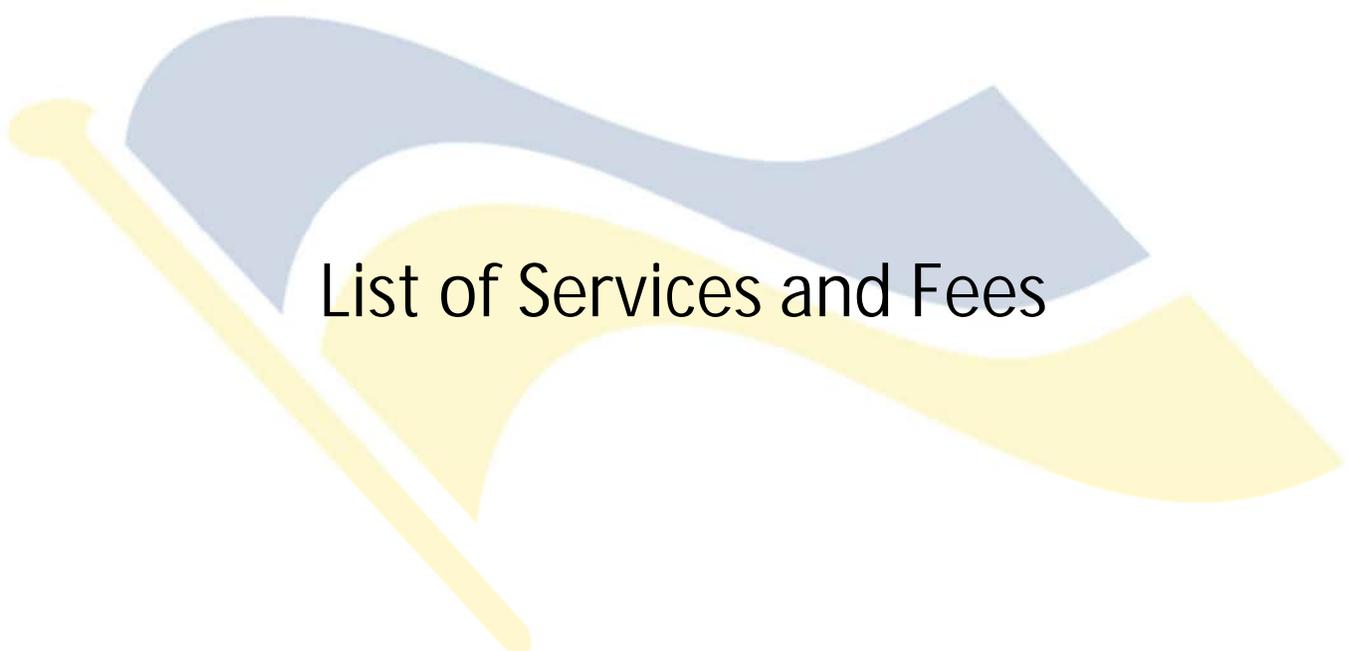


Branch Openings and Closings during the current year and the prior two calendar years



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

no changes in 2024 - 2026



List of Services and Fees



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
 - Apple Pay
 - Samsung Pay
 - Google Pay
 - Fitbit Pay
 - Garmin Pay
- Zelle
- Wire Transfers
- Direct Deposit
- Night Deposit
- Credit Cards
- Automatic Payments/Transfers
- ACH Block
- Cash Advance Services
- Overdraft Protection
- Bank Checks
- Notary Services
- ITIN services

Loan and Commercial Services

- Commercial Construction Loans
- Business Loans, Lines of Credit, SBA Loans
- Consumer Loans – Unsecured Term Notes
- Overdraft Line of Credit Products
- Business Deposit Accounts (Checking, Savings, Money Market)
- Municipal Deposit Accounts (Checking, Money Market)
- Corporate Credit Cards
- Sweep Accounts
- Remote Item Capture
- Lockbox Services
- Bill Pay
- Positive Pay
- Merchant Services

FEE SCHEDULE EFFECTIVE 08/01/2024

Account Early Closure Fee (within 90 days)	\$50.00
Account Research (per hour, \$30 minimum)	\$50.00
Bill Pay Next Day Draft Check Fee	\$14.95
Bill Pay Same Day Electronic Fee (qualified vendors only)	\$9.95
Check Cashing (non-customer)	\$10.00
Check Copy (on paper)	\$2.00
Checks – temporary (per sheet of 4)	\$4.00
Check Images returned with statement (monthly)	\$5.00
Collection Items (plus expenses)	\$29.00
Coin counting (\$100 and more)	2% of total
Copies (per page)	\$1.00
Credit card payment processing	\$3.00
Debit Card Replacement	\$10.00
Expedited Card Service	\$40.00
Excessive Transaction Fee (per item over 6 preauthorized transactions)	\$15.00
Foreign Check Deposit	\$15.00*
Foreign Currency Fee (buy or sell)	\$35.00
Green Surcharge (monthly fee per account using paper statements)	\$5.00
Inactivity Fee Checking/Savings Account (monthly, after 6 months with no activity)**	\$5.00
International ACH	\$10.00
International ACH Returned	\$15.00
IRA/HSA External Transfer	\$35.00
ITIN Application Processing	\$75.00***
Levies/Garnishments	\$100.00
Non-Sufficient Funds (per item)	\$25.00
Official Checks	\$8.00
Overdraft Protection (per transfer)	\$10.00
Overdrafts (per item; max. 3 per day)	\$35.00
Overdrafts Consecutive Day	\$5.00
Returned Deposit Item (commercial customers only)	\$10.00
Returned Loan Payment	\$20.00
Safe Deposit Box	
2x5	\$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 Copy (on paper)	\$5.00
Stop Payment	\$35.00
Telephone Transfer	\$5.00
Wire Transfer Domestic (incoming)	\$15.00
Wire Transfer Domestic (outgoing)	\$35.00
Wire Transfer International (incoming)	\$20.00
Wire Transfer International (outgoing, in US Dollars)	\$50.00
Wire Transfer International (outgoing, in foreign currency)	\$65.00
Wire Transfer Trace/Service Request (domestic)	\$35.00
Wire Transfer Trace/Service Request (international)	\$50.00
Wire Transfer Returned (domestic)	\$35.00*
Wire Transfer Returned (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 customer-initiated activity for HSA and HSA Money Market accounts with a balance under \$100

*** checking and savings account required

Other fees and charges may apply and are listed in the Truth In Savings disclosure provided at new account opening.

COMMERCIAL DEPOSIT FEES

	Commercial Checking	Community Checking	Business 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 Manager)	\$35.00	\$35.00	\$35.00
International Wire Transfers (outgoing, in USD)	\$50.00	\$50.00	\$50.00
International Wire Transfers (outgoing, in foreign currency)	\$65.00	\$65.00	\$65.00
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 (after 500)	\$0.18 (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

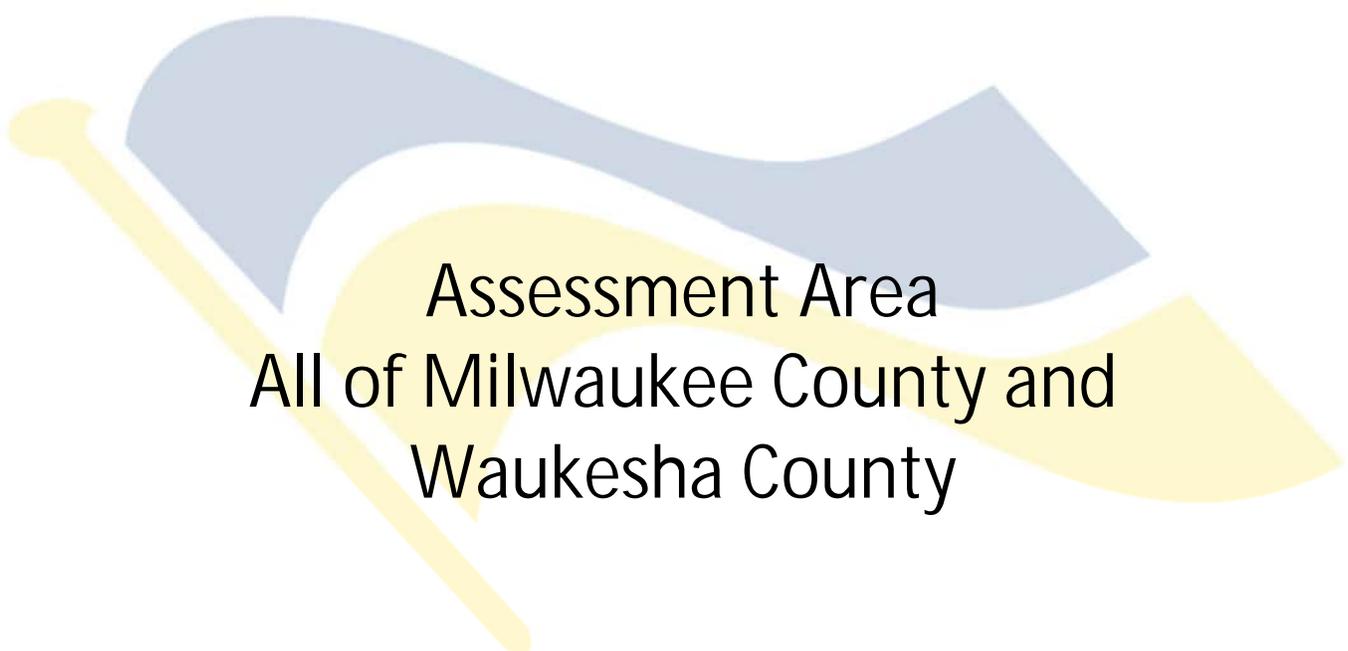
Loan Payoff Fee (administrative, not prepayment fee)	\$150.00
Loan Documentation Fee (minimum)	\$500.00
Origination Fee	Varies

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

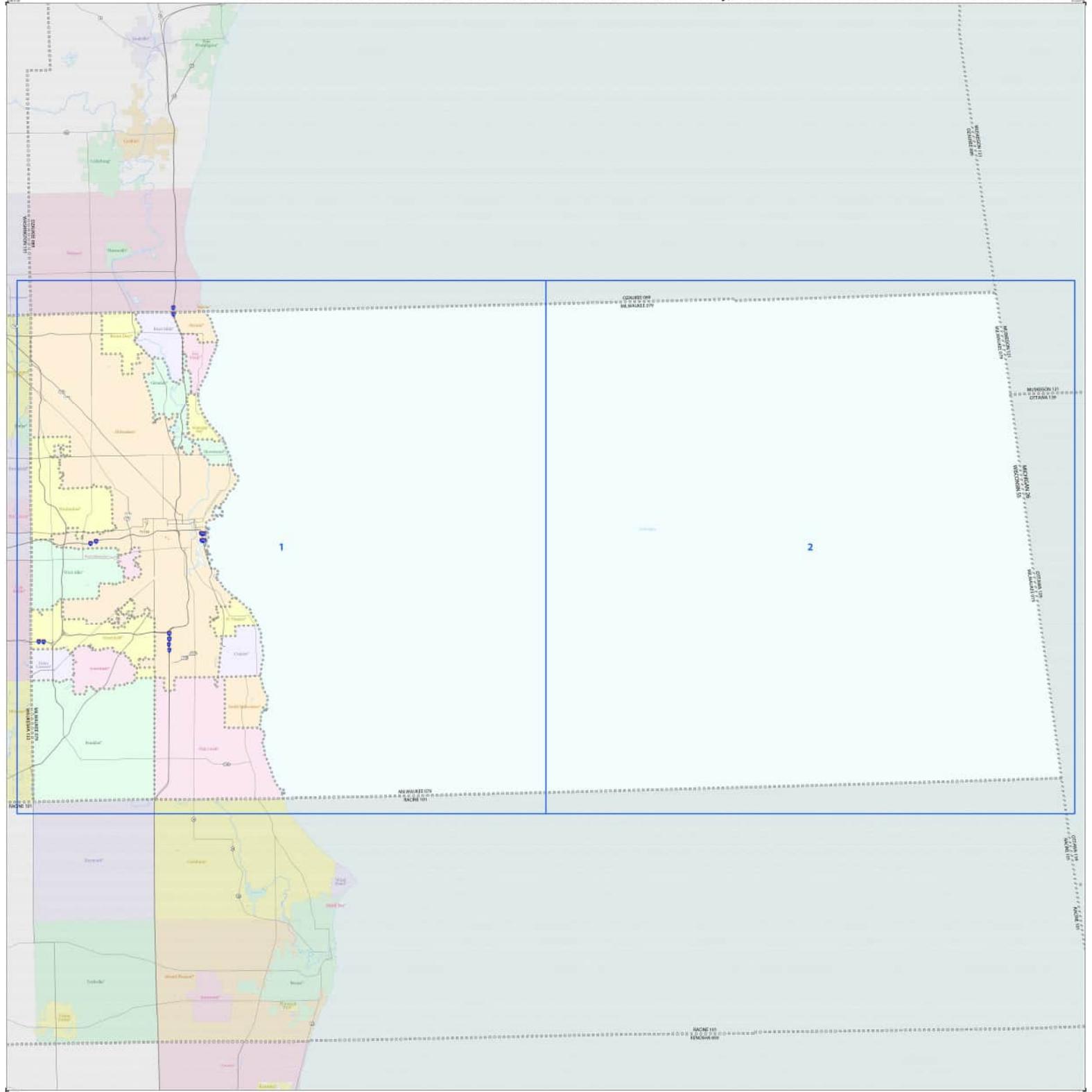
RESIDENTIAL LOAN FEES

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



Assessment Area
All of Milwaukee County and
Waukesha County

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Milwaukee County, WI



SYMBOL DESCRIPTION	SYMBOL	LABEL/TEXT	SYMBOL DESCRIPTION	SYMBOL	LEGEND
International Boundary	—•••••—	CANADA	Unincorporated Place 10	—•••••—	Unincorporated Place 10 (Dotted)
Unincorporated Place	—•••••—	UNINCORPORATED PLACE	Unincorporated Place 100	—•••••—	Unincorporated Place 100 (Dotted)
City Boundary	—•••••—	71000	City Boundary	—•••••—	City Boundary (Dotted)
County Boundary	—•••••—	UNINCORPORATED PLACE	County Boundary	—•••••—	County Boundary (Dotted)
State Boundary	—•••••—	NEW YORK 36	State Boundary	—•••••—	State Boundary (Dotted)
Water	Blue	WATER	Water	Blue	Water
Land	Yellow/Orange	LAND	Land	Yellow/Orange	Land
...					

OFF-RESERVATION TRUST LAND NAMES
 71111 - Forest County Parklands

When two or more adjacent parcels are owned by the same owner, the map shows the boundary between the parcels for clarity. The boundary between the parcels is shown as a solid line. The boundary between the parcels is shown as a solid line.

Geographic information is derived from the 2010 Census of Population and Housing, Census of the United States and Puerto Rico, and the 2010 Census of Population and Housing, Census of the United States and Puerto Rico, and the 2010 Census of Population and Housing, Census of the United States and Puerto Rico.

Map Scale: 1:100,000

Map Date: January 2020

Map Author: Geographic Division, January 2020

Total Sheets: 3 (Index 1; Part 2; Sheet 3)

NAME: Milwaukee County 070
 BOTH THE COUNTY AND CENSUS TRACT BOUNDARIES ARE SHOWN ON THIS MAP.

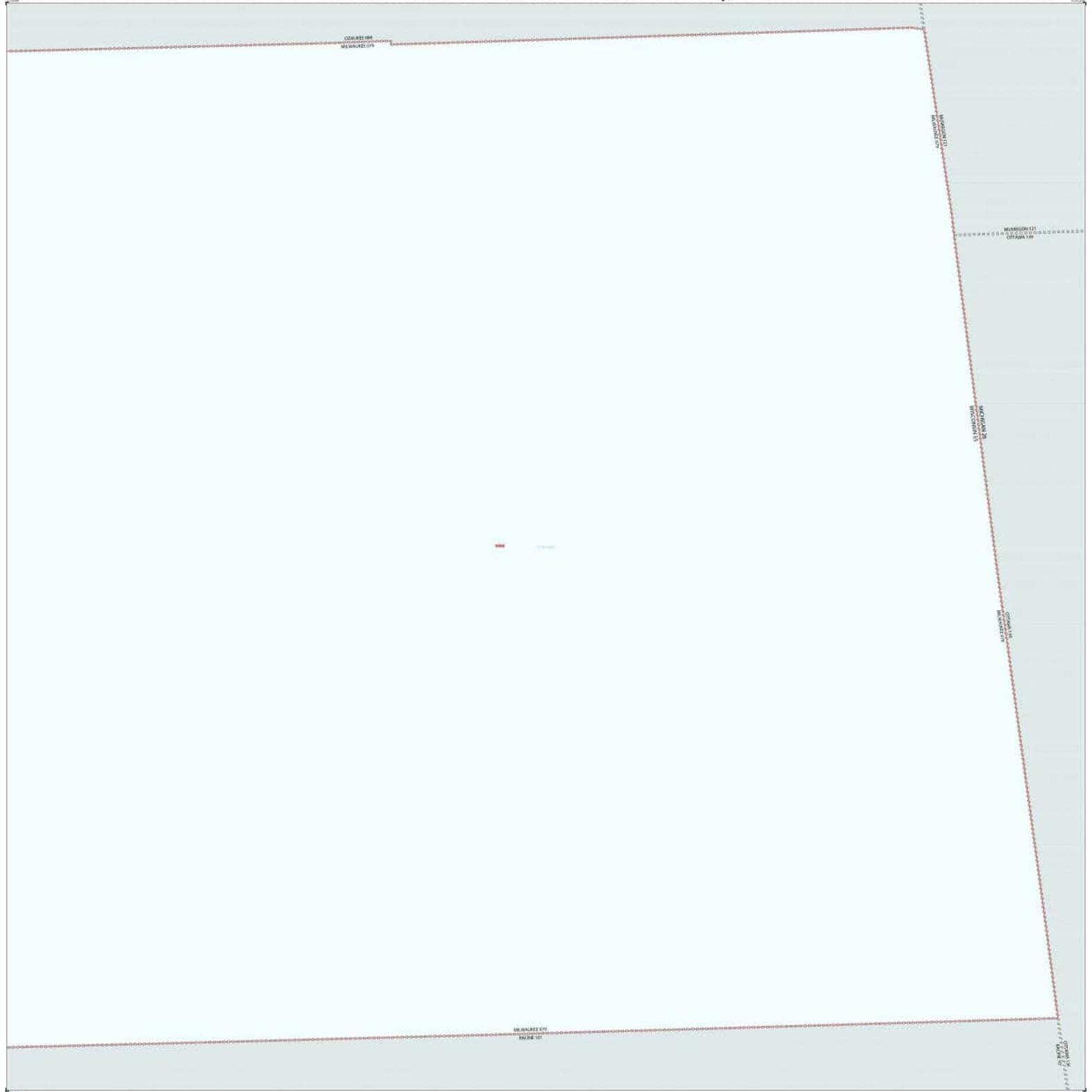
Map Scale: 1:100,000

Map Date: January 2020

Map Author: Geographic Division, January 2020



2020 CENSUS - CENSUS TRACT REFERENCE MAP: Milwaukee County, WI



SYMBOL DESCRIPTION	SYMBOL	LABEL/TEXT	SYMBOL DESCRIPTION	SYMBOL	SYMBOL DESCRIPTION	SYMBOL	SYMBOL DESCRIPTION	SYMBOL
International Boundary	-----	CANADA	International Water	-----	Water	Blue	Water	Blue
State Boundary	-----	NEW YORK 36	County Boundary	-----	County Boundary	Red	City Boundary	Red
Water	Blue	Water	City Boundary	Red	City Boundary	Red	City Boundary	Red
...

LEGEND

When a boundary is shown on the map, it is shown as a dashed red line. The boundary is shown as a solid red line when it is a city boundary. The boundary is shown as a solid blue line when it is a water boundary. The boundary is shown as a solid black line when it is a county boundary. The boundary is shown as a solid black line when it is a state boundary. The boundary is shown as a solid black line when it is an international boundary.

When a boundary is shown on the map, it is shown as a dashed red line. The boundary is shown as a solid red line when it is a city boundary. The boundary is shown as a solid blue line when it is a water boundary. The boundary is shown as a solid black line when it is a county boundary. The boundary is shown as a solid black line when it is a state boundary. The boundary is shown as a solid black line when it is an international boundary.

Scale: 1 inch = 1 mile

North Arrow

Key to Adjacent Sheets

1	2
---	---

Sheet Location within Belts

Sheet 2 of 2 PARENT sheets
Total Sheets: 3 (Index 1; Parent 2; Sheet 3)

NAME: Milwaukee County 0700
BOTH THE COUNTY AND CENSUS TRACT BOUNDARIES ARE SHOWN ON THIS MAP.

DATE: 2020
BY: Census Bureau, 2020 Census (Census 2020) (C2000-0700)

U.S. DEPARTMENT OF COMMERCE U.S. Census Bureau



Milwaukee County

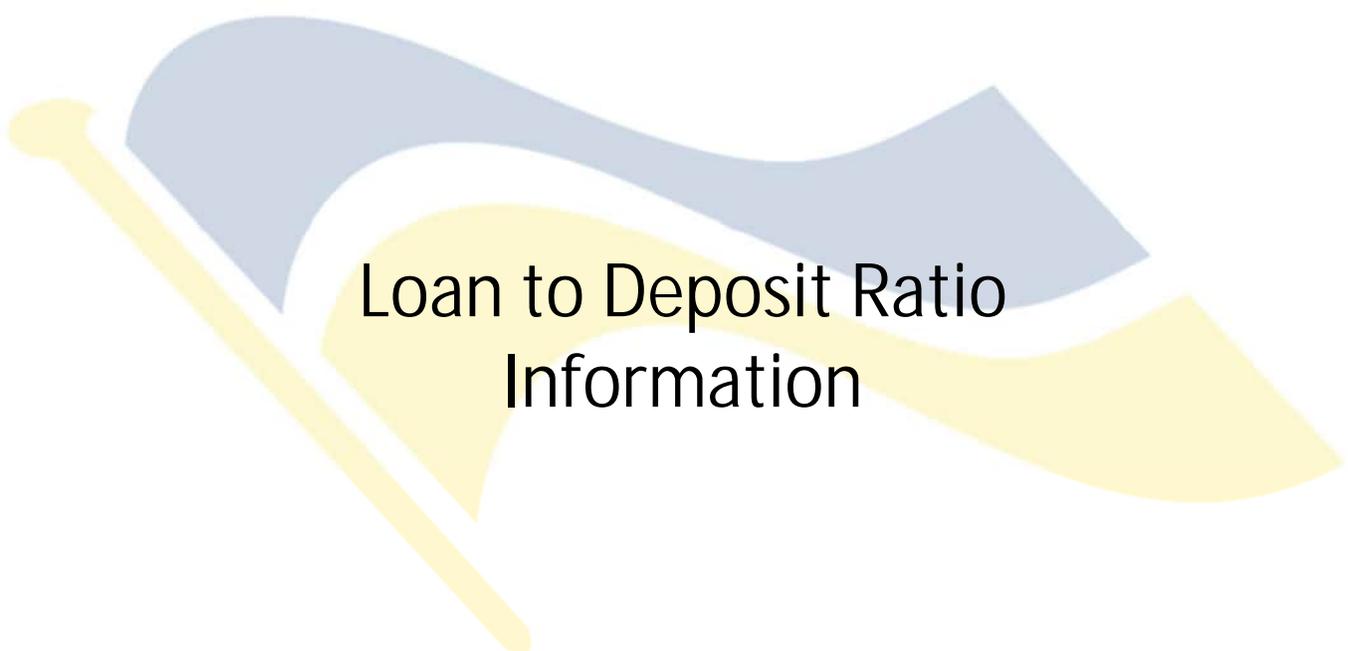
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Waukesha County

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Loan to Deposit Ratio
Information



2025 Quarterly Loan to Deposit Ratios

March 31, 2025	103.71
June 30, 2025	102.63
September 30, 2025	103.81
December 31, 2025	104.52