



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 14, 2022 OCC  
CRA Performance Evaluation



## **PUBLIC DISCLOSURE**

February 14, 2022

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First Federal Bank of Wisconsin  
Charter Number 705313

1617 East Racine Avenue  
Waukesha, WI 53186

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 or Wisconsin's (First Federal or 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 majority of loan originations are made within the bank's AA.
- The borrower distribution of loans reflects reasonable distribution among borrowers of different incomes. The borrower distribution of loans reflects reasonable distribution among businesses of different sizes.
- The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. 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, First Federal's loan-to-deposit ratio is more than reasonable.

The bank's quarterly LTD ratio averaged 92.32 percent over the 13 quarters from December 31, 2018 to December 31, 2021. The bank ranks fourth in a peer group which includes seven other similarly situated banks with peer bank LTD ratios ranging from 78.37 percent to 127.47 percent in the specified time period. The banks in this peer group have total assets ranging from \$26.9 million to \$915.2 million.

### Lending in Assessment Area

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

The bank originated or purchased 68.4 percent of its total loans by number and 63.2 percent by dollar amount 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 the table below for additional detail.

<b>Table D - Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	54	60.0	36	40.0	90	14,182	51.6	13,302	48.4	27,484
2019	25	64.1	14	35.9	39	5,582	59.3	3,837	40.7	9,419
2020	44	62.9	26	37.1	70	12,009	56.9	9,093	43.1	21,103
<b>Subtotal</b>	<b>123</b>	<b>61.8</b>	<b>76</b>	<b>38.2</b>	<b>199</b>	<b>31,774</b>	<b>54.8</b>	<b>26,232</b>	<b>45.2</b>	<b>58,005</b>
Small Business										
2018-2020	63	86.3	10	13.7	73	22,828	80.4	5,581	19.7	28,409
<b>Subtotal</b>	<b>63</b>	<b>86.3</b>	<b>10</b>	<b>13.7</b>	<b>73</b>	<b>22,828</b>	<b>80.4</b>	<b>5,581</b>	<b>19.7</b>	<b>28,409</b>
<b>Total</b>	<b>186</b>	<b>68.4</b>	<b>86</b>	<b>31.6</b>	<b>272</b>	<b>54,602</b>	<b>63.2</b>	<b>31,813</b>	<b>36.8</b>	<b>86,414</b>
<i>Source: 01/01/2018 - 12/31/2020 Bank Data Due to rounding, totals may not equal 100.0%</i>										

## Description of Institution

First Federal is a single-state thrift institution headquartered in Waukesha, Wisconsin, and a majority-owned subsidiary of FFBW, MHC. As of December 31, 2021, First Federal had \$357.1 million in total assets, a loan portfolio of \$225.3 million, and tier 1 capital of \$75.6 million. On December 31, 2020, First Federal acquired Mitchell Bank, which increased total assets from \$285.6 million as of September 30, 2020, to \$338.5 million as of year-end 2020.

First Federal 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 December 31, 2021, the loan portfolio represents 63.0 percent of total assets and is comprised of 78.9 percent of commercial loans, 21.0 percent of residential real estate loans, and 0.2 percent of consumer loans.

During the evaluation period, First Federal operated out of four branches, two located in Waukesha, one in Milwaukee, and one in Brookfield. Of the three branches located in Waukesha County, two are located in middle-income census tracts (CT) and one is located in an upper-income CT. The one branch located in Milwaukee County is in a middle-income CT. While not considered as part of this evaluation, as part of the Mitchell Bank acquisition, the bank added two branches, one in Brookfield and another on the south side of Milwaukee. The Mitchell Bank branch in Brookfield was closed and combined with the existing First Federal Brookfield branch due to location proximity. The surviving Mitchell Bank branch in Milwaukee County is located in a low-income CT. All of the bank's branches have automated teller machines. These additional locations are not considered in this assessment as the merger transaction occurred at the end of the evaluation period for the Lending Test but will be included as part of the next CRA performance evaluation.

The bank also received positive consideration for its response to the COVID-19 pandemic in 2020 through the origination of loans through the SBA Paycheck Protection Program (PPP). These loans helped to stabilize small businesses and communities in the AAs and statewide areas. The bank originated 170 PPP loans totaling \$14.0 million in 2020.

There are no legal or financial factors impeding the bank's ability to help meet the credit needs of its AA. At the prior CRA examination dated February 4, 2019, First Federal was evaluated using Small Bank Procedures and received a Satisfactory rating.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We evaluated First Federal's performance using the Small Bank procedures. The Lending Test assesses the bank's record of meeting credit needs of its AA through lending activities during the evaluation period of January 1, 2018 to December 31, 2020. We reviewed data for the bank's primary loan products, including small business loans and home mortgage loans, to evaluate the bank's lending performance.

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

The federal banking agencies are now updating decennial census data every five years, beginning with the Census Bureau's 2015 American Community Survey (ACS). This change was implemented in order to provide more current and accurate demographic data. During the current evaluation period, First Federal's AA was not affected by this change, and the lending data from 2018 through 2020 received the same analysis based on the 2015 ASC. Data is discussed in the applicable narrative sections of this 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 (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 borrowers of different incomes. The borrower distribution of loans reflects reasonable distribution among businesses of different sizes.
- The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. The geographic distribution of businesses 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 entirely in the state of Wisconsin. The Milwaukee-Waukesha, WI MSA AA includes all of Waukesha County and the southern portion of Milwaukee County. The AA complies with regulatory requirements and does not arbitrarily exclude any LMI geographies.

According to the Census Bureau's 2015 ACS, the bank's AA is comprised of 210 CTs, of which 23 (11.0 percent) are low-income, 37 (17.6 percent) are moderate-income, 76 (36.2 percent) are middle-income, and 74 (35.2 percent) are upper-income. There were none that were designated as NA.

The total population of the AA is 849,258, which is comprised of 215,836 families. The number of families at each income level is: 42,866 low-income (19.9 percent), 34,687 moderate-income (16.1 percent), 43,561 middle income (20.2 percent), and 94,722 upper-income (43.9 percent). The average median family income is \$71,764, and the FFIEC 2020 updated MSA median family income is \$83,800. The percentage of families below the poverty level is 8.6 percent. Owner-occupied units comprise 61.27 percent of total housing units. Based on 2020 demographic data, the total number of businesses with reported revenues in the AA was 48,697. Of these businesses, 38,592 (79.3 percent) had gross revenues of \$1.0 million or less, 4,309 (8.9 percent) had gross revenues of greater than \$1.0 million, and 5,796 (11.9 percent) businesses did not report revenue.

According to the FDIC Deposit Market Share Report as of June 30, 2021, there is significant competition within the AA. First Federal ranks 23rd in total deposits and has an overall market share of 0.33 percent. The balance of the market share is divided among 40 other financial institutions, ranging from 0.01 percent to 41.30 percent.

### *Employment and Economic Factors*

The December 2020 annual unemployment rate for Milwaukee County and Waukesha County was 5.6 percent and 3.4 percent respectively. The annual unemployment rate for the state of Wisconsin was 4.0 percent. During the evaluation period, the unemployment rate for Milwaukee County got as high as 16.5 percent and 13.1 percent for Waukesha County in April of 2020, driven largely by the COVID-19 pandemic. Major employers in the area include Aurora Health Care Inc., Froedtert Health, Quad Graphics Inc, and Kohl's.

According to Moody's Analytics report, hotels, restaurants, and other leisure-time activities saw more than 10,000 jobs added in 2021, or more than half of those lost to the pandemic remaining to be filled. Expansions in technology manufacturing firms such as top employer GE Healthcare, and parts producer Foxconn, which has been adding hundreds of jobs each year to its plant in Racine County to obtain preferential tax treatment, are helping the area shift away from declining industries such as paper products. Increased activity in durable goods manufacturing and easing of pandemic supply constraints will be key contributors to growth in the near term, and the largest source of risks".

### *Community Contact*

We used community contact information for Milwaukee County and reviewed an action plan for Waukesha County. Affordable housing is a need in the community with projects located near job centers. Housing will need to be affordable to service employees and other lower-wage members of the workforce. There is also a need for housing rehabilitation programs, foreclosure prevention, and access to housing for senior citizens in the area.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: First Federal Milwaukee-Waukesha MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	210	11.0	17.6	36.2	35.2	0.0
Population by Geography	849,258	8.7	15.6	34.0	41.6	0.0
Housing Units by Geography	356,533	7.4	16.1	36.7	39.8	0.0
Owner-Occupied Units by Geography	218,436	3.1	12.2	33.5	51.1	0.0
Occupied Rental Units by Geography	118,685	13.6	23.1	43.4	19.9	0.0
Vacant Units by Geography	19,412	17.0	17.8	32.0	33.1	0.0
Businesses by Geography	48,697	4.7	13.2	31.7	50.4	0.0
Farms by Geography	1,093	3.2	8.4	27.7	60.7	0.0
Family Distribution by Income Level	215,836	19.9	16.1	20.2	43.9	0.0
Household Distribution by Income Level	337,121	21.8	14.9	17.7	45.7	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha, WI MSA		\$71,764	Median Housing Value			\$198,782
			Median Gross Rent			\$855
			Families Below Poverty Level			8.6%

*Source: 2015 ACS and 2020 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.*

## **Scope of Evaluation in Wisconsin**

The Wisconsin state rating is based on the results of the Milwaukee-Waukesha MSA AA. Since this AA 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. Based on a full-scope review, the bank's performance in the Milwaukee-Waukesha MSA is adequate.

## **Distribution of Loans by Income Level of the Geography**

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

### ***Home Mortgage Loans***

Refer to Table O in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of loans reflects reasonable distribution among borrowers of different geographies. The bank originated 1.6 percent of home mortgage loans in low-income geographies. The percentage of the bank's loans is below the demographics that show 3.1 percent of owner-occupied housing units is in low-income geographies. The percentage of bank originated loans exceeds the aggregate peer lending data, which shows 1.0 percent of home mortgage lending was in low-income geographies. The bank originated 17.1 percent of home mortgage loans in moderate-income geographies. The percentage of the bank's loans exceeded the demographics that show 12.2 percent of owner-occupied housing units is in moderate-income geographies. The percentage of bank originated loans also exceeds the aggregate peer lending data, which shows 8.6 percent of home mortgage lending was in low-income geographies.

### ***Small Loans to Businesses***

Refer to Table Q in 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 excellent distribution among geographies. The bank originated 17.5 percent of business loans in low-income geographies. The percent of the bank's originated loans exceeds the demographics that indicate 4.7 percent of AA businesses are in low-income geographies and exceeds the aggregate peer lending data in the low-income geographies of 4.4 percent. The bank originated 14.3 percent of business loans in moderate-income geographies. The percent of the bank's originated loans exceeds the demographics that indicate 13.2 percent of AA businesses are in moderate-income geographies and exceeds the aggregate peer lending data in the moderate-income geographies of 11.8 percent.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes. The bank originated 4.0 percent of its home mortgages to low-income families. This percentage is less than the demographics that indicate 19.9 percent of families in the AA are low-income. The percentage of bank loans to low-income families is less than the aggregate peer lending data, which show 4.7 percent of peer lending within the AA was to low-income families. The bank originated 8.9 percent of home mortgages to moderate-income families, which is less than the demographics that show 16.1 percent of families in the AA are moderate-income. The bank's lending is also less than the aggregate peer lending data, which show 17.2 percent of peer lending within the AA was to moderate-income families.

### ***Small Loans to Businesses***

Refer to Table R in 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 68.3 percent of its business loans to AA small businesses (businesses with gross annual revenues 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 79.2 percent of total businesses. The percentage of bank loans to small businesses exceeds the aggregate lending data which shows 37.0 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 practices during this evaluation.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	January 1, 2018 through December 31, 2020	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None.		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Milwaukee-Waukesha, WI MSA	Full-scope	All of Waukesha County and the southern portion of Milwaukee County

## Appendix B: Summary of MMSA and State Ratings

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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

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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

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### 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 30<sup>th</sup> of each year.

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.
- 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.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018-2020**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
First Federal Milwaukee-Waukesha MSA	123	31,774	100.0	57,951	3.1	1.6	1.0	12.2	17.1	8.6	33.5	39.8	29.0	51.1	41.5	61.4	0.0	0.0	0.0
<b>Total</b>	<b>123</b>	<b>31,774</b>	<b>100.0</b>	<b>57,951</b>	<b>3.1</b>	<b>1.6</b>	<b>1.0</b>	<b>12.2</b>	<b>17.1</b>	<b>8.6</b>	<b>33.5</b>	<b>39.8</b>	<b>29.0</b>	<b>51.1</b>	<b>41.5</b>	<b>61.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018-2020**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
First Federal Milwaukee-Waukesha MSA	123	31,774	100.0	57,951	19.9	4.0	4.7	16.1	8.9	17.2	20.2	11.4	22.5	43.9	39.8	43.7	0.0	39.0	11.9
<b>Total</b>	<b>123</b>	<b>31,774</b>	<b>100.0</b>	<b>57,951</b>	<b>19.9</b>	<b>4.0</b>	<b>4.7</b>	<b>16.1</b>	<b>8.9</b>	<b>17.2</b>	<b>20.2</b>	<b>11.4</b>	<b>22.5</b>	<b>43.9</b>	<b>39.8</b>	<b>43.7</b>	<b>0.0</b>	<b>39.0</b>	<b>11.9</b>

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA 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 2018-2020**

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	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
First Federal Milwaukee MSA	63	22,828	100.0	18,728	4.7	17.5	4.4	13.2	14.3	11.8	31.7	31.8	30.0	50.4	36.5	53.8	0.0	0.0	0.0
<b>Total</b>	<b>63</b>	<b>22,828</b>	<b>100.0</b>	<b>18,728</b>	<b>4.7</b>	<b>17.5</b>	<b>4.4</b>	<b>13.2</b>	<b>14.3</b>	<b>11.8</b>	<b>31.7</b>	<b>31.8</b>	<b>30.0</b>	<b>50.4</b>	<b>36.5</b>	<b>53.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 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 2018-2020**

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 Milwaukee MSA	63	22,828	100.0	18,728	79.2	68.3	37.0	8.8	31.8	11.9	0.0
<b>Total</b>	<b>63</b>	<b>22,828</b>	<b>100.0</b>	<b>18,728</b>	<b>79.2</b>	<b>68.3</b>	<b>37.0</b>	<b>8.8</b>	<b>31.8</b>	<b>11.9</b>	<b>0.0</b>

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%



# 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 2023 - 2025



# 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
- 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**

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

	<b>Commercial Checking</b>	<b>Community Checking</b>	<b>Business Checking</b>
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**

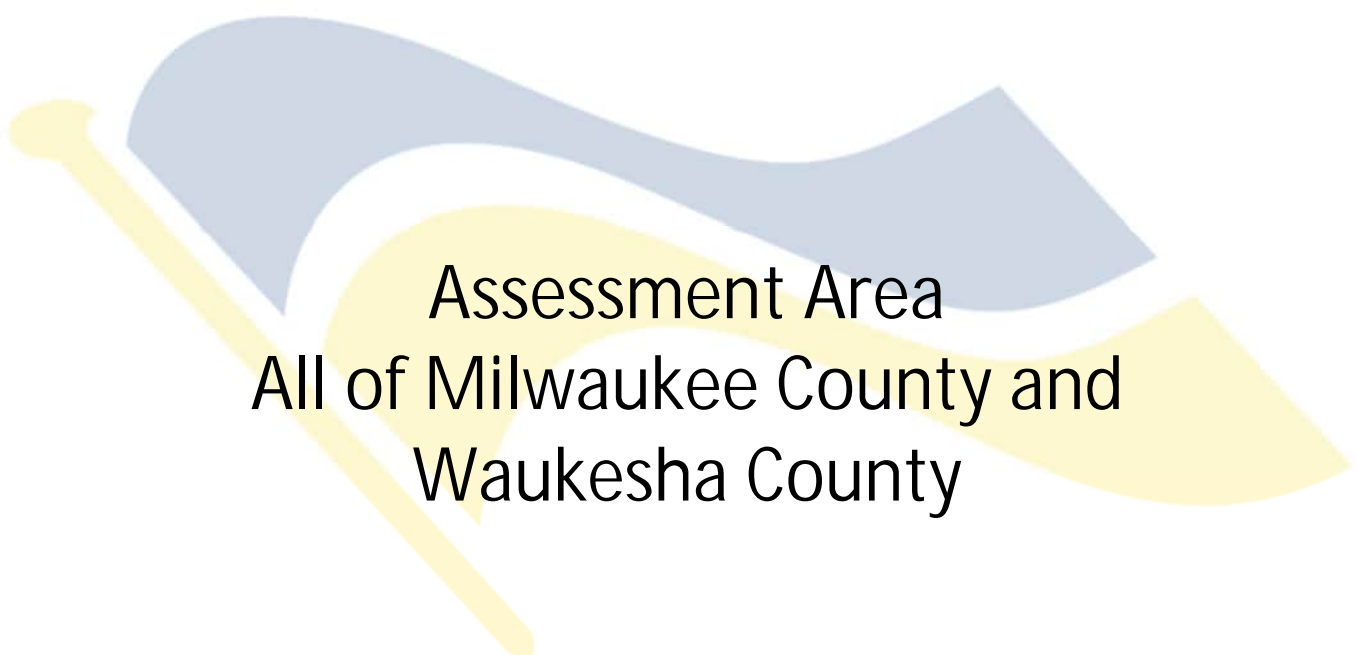
Loan Payoff Fee (administrative, not prepayment fee)	\$150.00
Loan Documentation Fee (minimum)	\$500.00
Origination Fee	Varies

**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

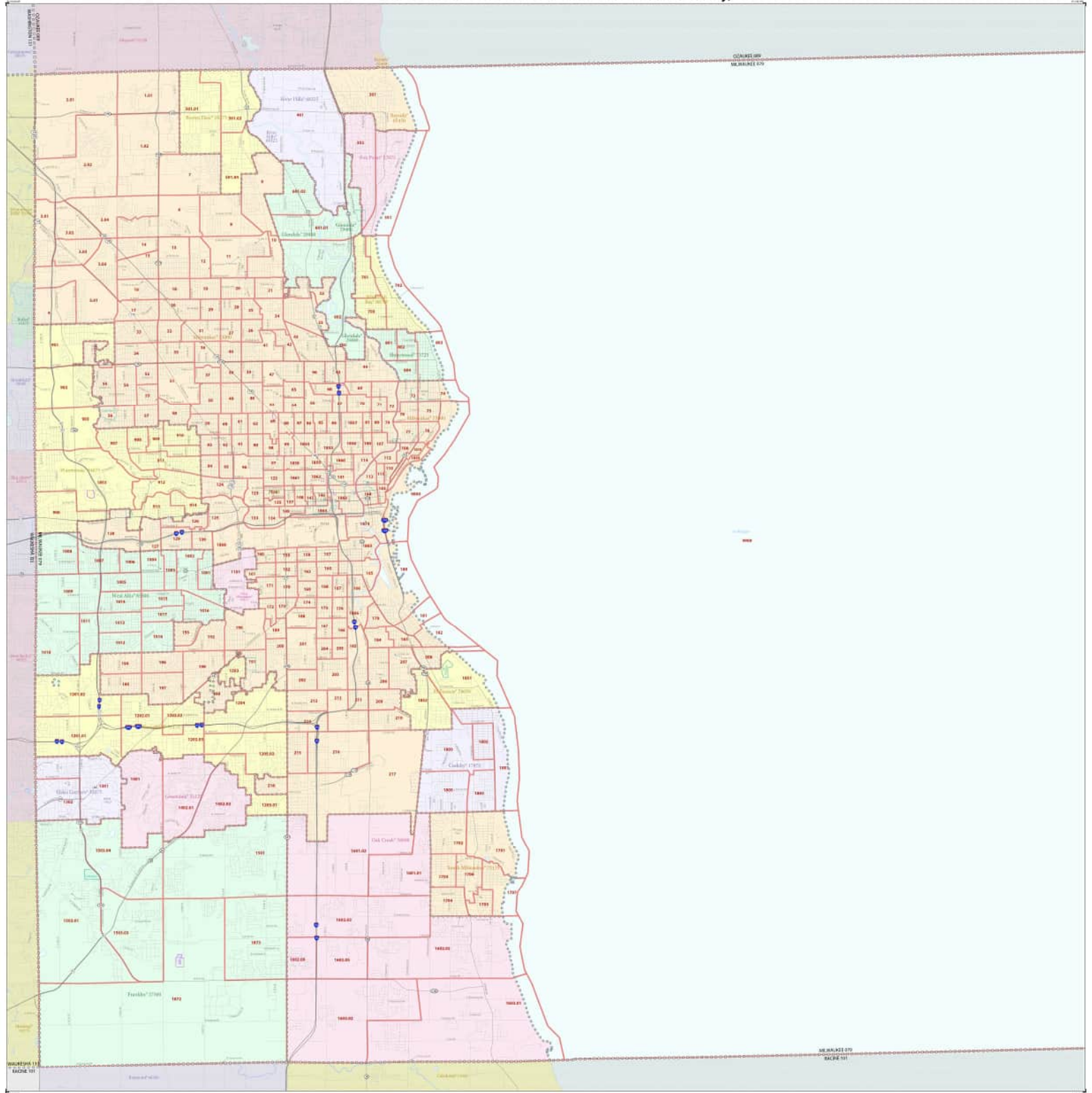


Assessment Area  
All of Milwaukee County and  
Waukesha County





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



GENERAL DESCRIPTION	SYMBOL	LABEL/TEXT	SYMBOL DESCRIPTION	SYMBOL	LEGEND	LABEL/TEXT
International Boundary	-----	CANADA	International Water	-----	Water	Blue
State Boundary	-----	STATE BOUNDARY	County Boundary	-----	County Boundary	Red
City Boundary	-----	CITY BOUNDARY	City Boundary	-----	City Boundary	Blue
Ward Boundary	-----	WARD BOUNDARY	Ward Boundary	-----	Ward Boundary	Green
Neighborhood Boundary	-----	NEIGHBORHOOD BOUNDARY	Neighborhood Boundary	-----	Neighborhood Boundary	Yellow
Water	Blue	Water	Water	Blue	Water	Blue
Land	Green	Land	Land	Green	Land	Green
Urban	Yellow	Urban	Urban	Yellow	Urban	Yellow
Rural	Light Green	Rural	Rural	Light Green	Rural	Light Green
Water	Blue	Water	Water	Blue	Water	Blue
Land	Green	Land	Land	Green	Land	Green
Urban	Yellow	Urban	Urban	Yellow	Urban	Yellow
Rural	Light Green	Rural	Rural	Light Green	Rural	Light Green

**OFF RESERVATION TRUST LAND NAMES**  
 11111 - Forest County Potawatomi

When a reservation, water, county, and/or METROCD boundary coincides, the map shows the boundary nearest the city for the highest ranking of these boundaries.

Geographic areas shown are defined by either State or METROCD boundaries.

1. A "1" following the METROCD name denotes a "1" following a public state waterway that has METROCD waters with the same name and FIPS code as the place. For other METROCD waters, there is no "1".

2. Place labels color correspond to the place ID color.

3. Census tracts are identified by an 8-digit unique number and may have an optional 9th digit suffix for example 21 or 21012. The census tract label consists of the 8-digit unique number followed by the optional 9th digit suffix for census tracts with a suffix. The 9th digit number usually indicates the base number of tracts in that county.

Other symbols include:

- City Boundary
- County Boundary
- Neighborhood Boundary
- Ward Boundary
- Water
- Land
- Urban
- Rural

Map to Adjacent Sheets

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

NAME: Milwaukee County 0700  
 BIRTH: 2020 Census of the United States  
 11 December 2021

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

Map created by Geographic Division January 21, 2022  
 Map Update by Geographic Division January 21, 2022

Map of Milwaukee County, Wisconsin  
 2020 Census of the United States  
 11 December 2021

2020 Census of the United States  
 11 December 2021





Milwaukee County

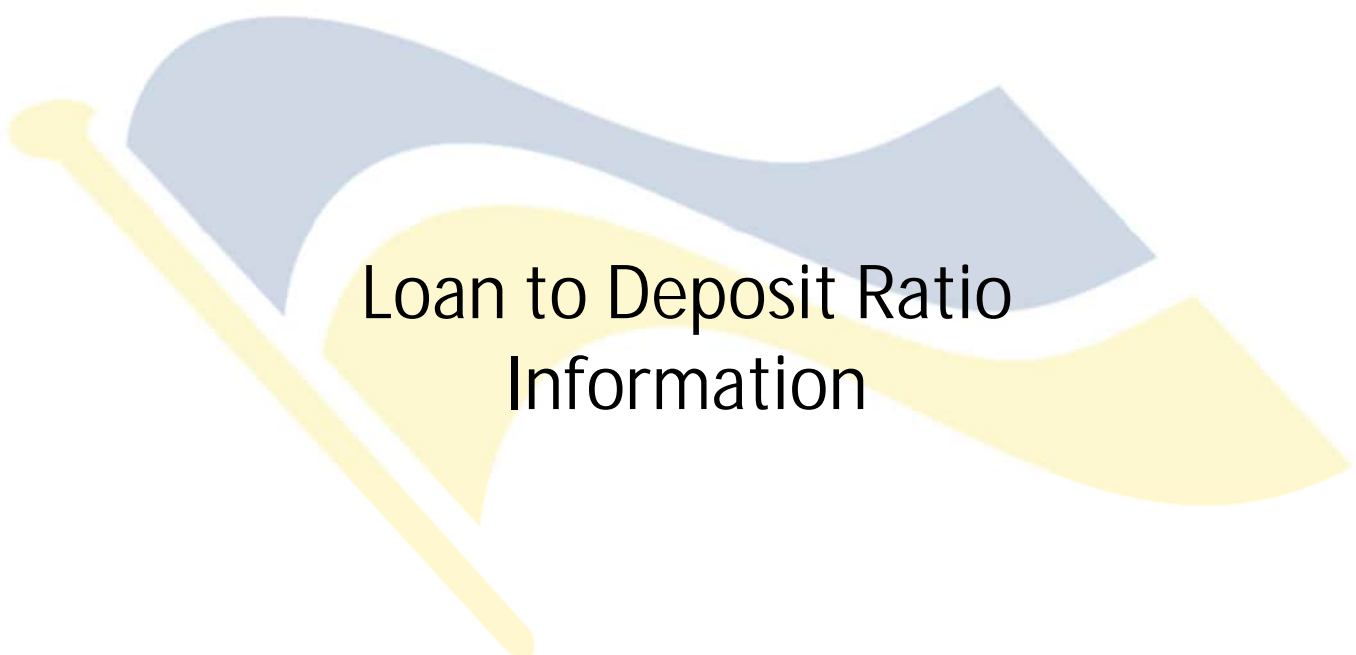
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**Waukesha County**

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Loan to Deposit Ratio  
Information





## 2024 Quarterly Loan to Deposit Ratios

<b>March 31, 2024</b>	104.73
<b>June 30, 2024</b>	104.84
<b>September 30, 2024</b>	102.57
<b>December 31, 2024</b>	106.38