



PUBLIC DISCLOSURE

March 4, 2019

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

First Federal Bank of Kansas City
Charter Number 702825
6900 North Executive Drive
Kansas City, Missouri 64120

Office of the Comptroller of the Currency
Kansas City Field Office
7100 College Boulevard, Suite 1600
Overland Park, Kansas, 66210

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: Satisfactory**Multistate Metropolitan Statistical Area Rating****CRA Rating for the Kansas City Missouri-Kansas (MO-KS) MSA: Satisfactory****The lending test is rated: Satisfactory****The community development test is rated: Satisfactory**

The major factors supporting this rating include:

- The First Federal Bank of Kansas City (FFBKC or bank) borrower distribution of home mortgage loans for calendar years 2017 and 2018 to low-and-moderate income (LMI) borrowers reflects a reasonable distribution. The proportion of bank loans was generally comparable to demographic data for LMI families and the industry aggregate.
- The overall geographic distribution of the bank's home mortgage loans in LMI geographies is reasonable. The proportion of bank loans was generally comparable to the proportion of owner-occupied units and the industry aggregate distribution of loans in LMI geographies.
- FFBKC's average quarterly loan-to-deposit (LTD) ratio is more than reasonable.
- The bank's responsiveness to community development (CD) needs in its assessment area (AA) through CD loans, qualified investments, and services is adequate.

Loan-to-Deposit Ratio

FFBKC's quarterly average loan-to-deposit (LTD) ratio is more than reasonable. The bank's quarterly LTD ratio averaged 105.8 percent from March 31, 2016 to December 31, 2018. The average quarterly LTD ratio for five similarly situated institutions over the same period is 92.4 percent with a range from a low of 88.9 percent to a high of 99.2 percent. FFBKC ranked first out of the six financial institutions serving the AA. The asset size of the institutions ranged from \$725 million to \$917 million, with an average asset size of \$803 million.

Lending in Assessment Area

FFBKC's lending in the AA is reasonable. Consistent with its business strategy, FFBKC is a nationwide mortgage lender through its internet consumer direct lending program, thus it originates the majority of these loans throughout the United States, and outside the AA. A significant majority of its retail mortgage loans are made in the AA. The bank's internal analysis shows 87.6 percent of these loans, by number, are in the AA. Refer to the table below for the combined local and national in and out ratios.

Lending Inside and Outside of the Assessment Area 2016 - 2018										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Total Retail Local and Consumer Direct National Mortgages	2,171	43.8	2,783	56.2	4,954	553,125	38.6	879,036	61.4	1,432,161

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data
Due to rounding, totals may not equal 100.0

Description of the Institutions Operations in Kansas City, MO-KS MSA AA

FFBKC is an \$820 million federally chartered mutual savings institution that operates its main office and branches in the Kansas City, MO-KS MSA. In May 2016, FFBKC merged with Inter-State Federal Savings and Loan Association of Kansas City, Kansas. The merger added five branches to FFBKC's operation and expanded its AA coverage to the Kansas side of the MSA. The AA now consists of six counties within the Kansas City, MO-KS MSA AA, which includes four counties in Missouri: Cass, Clay, Jackson, and Platte, and two counties in Kansas: Johnson and Wyandotte. FFBKC operates twelve offices that offer a range of loan and deposit products, the corporate/home mortgage operations center, and seven deposit-taking ATMs. Each ATM is located at a bank facility. In February 2018, FFBKC relocated the Overland Park Loan Production Office to its State Line location in Leawood, Kansas.

FFBKC's primary business focus is residential real estate lending. The bank has two primary residential lending divisions. Consumer direct lending, which has a national footprint with loan originations in all 50 continental states, and retail mortgage lending, which focuses on originating loans in the six-county AA. FFBKC sells the majority of loans it originates on the secondary market. As of December 31, 2018, the bank's loan portfolio, by dollar volume, consisted of 88.1 percent residential real estate loans, 9.3 percent construction and development loans, and 2.6 percent consumer loans. Net loans and leases were 76.6 percent of average assets. Total deposits were at \$518 million. Net tier 1 capital was \$115.8 million, or 14.1 percent of total assets.

According to the FDIC Deposit Market Share Report, as of June 30, 2018, FFBKC ranked 18 out of 95 financial institutions. Major competitors include large financial institutions, regional banks, local community banks, credit unions, and other nonbank financial institutions operating in the AA and nationwide with deposits ranging from \$500 million to \$11.5 billion in the AA. The top five institutions in the AA have 56.7 percent of the deposit market share. These institutions have total assets ranging from \$9.3 billion to \$23.1 billion.

FFBKC received a satisfactory rating at its previous CRA examination dated February 16, 2016. There are no legal, financial, or other constraints limiting FFBKC's ability to meet the credit needs of its AA.

Community Reinvestment Act Plan

During the CRA evaluation period, FFBKC committed to a CRA Plan in May 2016 as a condition of its approval to merge with Inter-State Federal Savings and Loan Association of Kansas City, Kansas. A rating is not assigned for the bank's CRA Plan activities. Consideration rather was given to whether the CRA Plan activities had a positive, neutral, or negative impact on the Lending and Community Development Test ratings. The CRA Plan is intended to enhance FFBKC's CRA performance within its AA. The CRA Plan covers years 2016 to 2018, which coincides with the bank's CRA evaluation period.

Overall, the bank's CRA Plan activities met or exceeded established goals. The CRA Plan provided for enhancing governance and oversight of the bank's CRA program; hosting an annual housing symposium; assisting in funding a revolving loan pool designed to finance the rehabilitation of vacant and blighted homes in the AA including LMI geographies; providing workshops and programs to increase financial literacy within the bank's AA including LMI individuals, minority individuals, and LMI geographies to increase the awareness of home mortgage opportunities. The bank provided outreach and affirmative marketing of its home mortgage products within the AA including LMI geographies. In addition, a CRA Committee was established and the bank hired a community development officer in 2016 to provide program oversight, a community mortgage lender in 2017, and a

bilingual mortgage consultant in 2018. Management partnered with local community groups to increase CRA and fair lending awareness efforts. FFBKC also established an Affordable Housing Mortgage subsidy program to provide discounts or subsidies for owner occupied home purchase loans. The participant can use the \$2,500 subsidy for closing cost, down-payment assistance, or interest rate reduction. Lastly, of the twelve bank locations, six are in LMI geographies. The bank has maintained the three full-service branches located in minority census tracts and acquired in the Inter-State Federal Savings and Loan Association merger.

Scope of Evaluation in Kansas City, MO-KS MSA

Evaluation Period/Products Evaluated

The CRA evaluation determines the bank's record of meeting community credit needs. We used a combination of bank and examiner generated loan and/or demographic reports to assess the bank's CRA performance. Consistent with FFBKC's business strategy, the bank's primary product by dollar and number is home mortgage loans. This evaluation also included an evaluation of the bank's community development lending, services, and investment activities. The evaluation period for the lending test is January 1, 2016 through December 31, 2018. We placed greater weight on performance in 2017 and 2018 since this is based on more recent American Community Survey Census Data. The evaluation period for community development activities is February 17, 2016 through December 31, 2018.

Data Integrity

This evaluation was based on accurate and reliable data using the bank's Home Mortgage Disclosure Act (HMDA) and community development data. We verified the accuracy of this data during a Data Integrity review in February 2019. We analyzed FFBKC's portfolio of residential real estate loans to conduct the borrower and geographic distribution reviews for the lending test. We used the bank's CD data to conduct the community development test.

Selection of Areas for Full-Scope Review

FFBKC has one AA. We completed a full-scope review of the bank's Kansas City, MO-KS MSA AA. Refer to Appendix A for more information.

Ratings

The bank's overall rating is based on its performance in the full-scope review of the Kansas City, MO-KS MSA AA.

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 Consumer Financial Protection Bureau, as applicable.

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

The OCC will consider any information that FFBKC engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank'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.

Conclusions with Respect to Performance Tests in the Kansas City, MO-KS MSA

LENDING TEST

FFBKC's performance under the lending test is rated satisfactory. Lending volumes and distribution are reasonable given the bank's size, complexity, and financial condition.

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

The overall borrower distribution is reasonable.

The distribution of the bank's home mortgage loans for calendar years 2017 and 2018 to LMI borrowers is generally reasonable. The proportion of loans was generally comparable to the percent of LMI families and also comparable to the aggregate distribution of loans to those borrowers. The bank's performance in calendar year 2016 was similar.

For calendar years 2017 and 2018, the borrower distribution of bank loans to moderate-income borrowers of 16.8 percent was slightly below but comparable to both the industry aggregate of 17.5 percent and the proportion of LMI families of 17.3 percent for the AA. The bank's performance was stronger than the aggregate in calendar year 2016 and was comparable to the percent of families' demographic data.

For calendar years 2017 and 2018, the borrower distribution of bank loans to low-income borrowers of 7.7% was comparable to the industry aggregate of 7.2%, but was below the 21.2% proportion of low income families for the AA. The bank's performance was similar in calendar year 2016. The bank and industry performance was impacted by the median housing value (MHV) to income ratio of 2.82x in the AA. The high MHV reflects a lack of affordable properties for LMI families, which constrains lending opportunities to LMI borrowers. This especially impacts low income borrowers, who by definition earn less than half the median income for the area.

Refer to Table P in Appendix D for additional details.

Geographic Distribution of Loans

Overall, the geographic distribution of the bank's home mortgage loans in LMI geographies is reasonable. The proportion of loans was generally comparable to the proportion of owner-occupied units and the aggregate distribution of loans in those geographies. The proportion of home mortgage loans in low-income geographies is weaker than the owner-occupied housing units, but comparable to the aggregate distribution of home mortgage loans in those geographies. The proportion of home mortgage

loans in moderate-income geographies was comparable to both the owner-occupied housing units and the aggregate distribution of home mortgage loans in those geographies. The bank's performance in 2017 through 2018 was stronger than performance in 2016.

Refer to Table O in the Appendix D for additional details.

Lending Gap Analysis

We performed a lending gap analysis to determine if any unexplained, conspicuous gaps existed. We used basic dot density maps and other reports on HMDA loan data showing the distribution of branches and loans within the bank's AA. We also considered competition, market conditions, and demographic information. The bank was able to provide sufficient reasonable explanations surrounding the poor loan penetration in LMI areas within Wyandotte, Johnson, and Jackson counties, respectively. The branches in Wyandotte and Johnson counties were acquired through a 2016 merger with another savings association that was not focused on home mortgage lending. In addition, there is strong competition, low housing stock, and a larger volume of vacant units in some areas, and a higher number of rental units throughout the counties, which combine to make home mortgage lending more difficult.

Responses to Complaints

FFBKC has not received any written complaints related to its CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

FFBKC's performance under the community development (CD) test is rated satisfactory.

Aggregate CD activities demonstrated adequate responsiveness to CD needs and opportunities in the AA. CD loans and investments including donations totaled \$4.7 million. The bank made seven community development loans to a local community development corporation (CDC) to construct or renovate seven houses in the AA within LMI geographies under the City's targeted revitalization plan for the area. The CDC states new housing construction and rehabilitation of existing housing is a priority of the city. FFBKC also provided funding to two CDFIs in the AA that primarily serve LMI individuals and small businesses. Bank employees provided 656 service hours to 15 qualified CD organizations during the evaluation period.

Number and Amount of Community Development Loans

CD loans demonstrated adequate responsiveness to CD needs and opportunities in the AA during the evaluation period. Management originated seven CD loans totaling more than \$1 million in the AA during the evaluation period. All loans provide support for revitalization and stabilization in low and moderate-income geographies. Loans were made to a CDC to construct homes as part of a City redevelopment plan to build new homes and rehabilitate existing homes in the LMI areas of Kansas City, Kansas.

Number and Amount of Qualified Investments

CD investments demonstrated adequate responsiveness to CD needs and opportunities in the AA during the evaluation period. Management purchased six investments totaling \$3.2 million in the AA during the evaluation period. Two of these investments supported affordable housing primarily targeted to LMI individuals. Three investments were with local CDFI Banks that primarily serve LMI individuals and small businesses. FFBKC provided subsidies as discussed in the CRA Plan including down payment assistance to 35 LMI individuals totaling \$75,258 for the purchase or refinance of homes in LMI census tracts. The bank presented no prior period investments for consideration.

Management made 59 qualified donations totaling \$426 thousand to 30 organizations in the AA during the evaluation period. Donations supported organizations who provide community services such as homeless shelters, financial education, credit repair, legal, and homebuyer education primarily to LMI individuals. Total investments made by the bank during the exam period total \$3.6 million.

Extent to Which the Bank Provides Community Development Services

FFBKC's record of providing CD services in the MSA AA is adequate. Eleven employees provided 656 hours to 15 qualified CD organizations or programs during the evaluation period. The bank had a subservicing agreement with Heartland Habitat for Humanity from the beginning of the exam period through 2017 servicing 153 loans. The bank spent 212 hours servicing these loans during the exam period. The bank will provide billing and payment collections on these home loans. This service helps facilitate affordable housing, which is an identified need in the community. The service ended when Habit for Humanity in the Kansas City area merged operations.

Bank employees provided financial education to several elementary school children from schools where more than 50 percent of students are eligible for the free and reduced lunch program. A senior member of management provides technical assistance on financial matters to a local CDC that provides affordable housing. Examples of CD services provided by bank staff include:

- Board member to a local community development corporation who primarily provides affordable housing and homebuyer education for LMI individuals.
- Committee member of a local lending consortium that provides lending assistance to LMI recipients of government assistance programs. The Consortium works with those in the CHIP program sponsored by City and County Government CDBG funds.
- Board member of a local CDFI located in and serving LMI individuals and geography with a primary focus on Hispanic-owned small businesses.

Responsiveness to Community Development Needs

FFBKC's CD activities in aggregate in the AA represent adequate responsiveness to CD needs in the AA. CD activities are consistent with the CD needs identified by community contacts in the AA.

Retail Banking

FFBKC has twelve branch banking locations in the AA with three locations in low-income census tracts and three located in moderate-income census tracts which is 50 percent of all locations in LMI census tracts. Four locations are in moderate-income tracts and two are in upper-income census tracts.

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 MSA(s) and non-MSA(s) 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	Lending Test: January 1, 2016 to December 31, 2018	
Financial Institution	Products Reviewed	
First Federal Bank of Kansas City Kansas City, Missouri	Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		No affiliate products reviewed
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Kansas City, MO-KS MSA AA	Full-Scope	<i>Stateside of Missouri: Cass, Clay, Jackson, and Platte counties</i> <i>Stateside of Kansas: Johnson and Wyandotte counties</i>

Appendix B: Community Profiles for Full-Scope Areas

Kansas City MO-KS MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Kansas City, MO-KS MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	483	16.1	22.2	30.8	26.9	3.9
Population by Geography	1,833,061	9.8	21.4	36.1	32.4	0.3
Housing Units by Geography	786,988	11.6	22.6	36.4	28.9	0.5
Owner-Occupied Units by Geography	464,339	6.2	17.5	38.1	38.0	0.2
Occupied Rental Units by Geography	251,928	17.0	30.3	35.5	16.5	0.7
Vacant Units by Geography	70,721	27.6	28.7	28.3	13.4	1.9
Businesses by Geography	125,119	7.1	18.5	34.3	38.0	2.1
Farms by Geography	3,363	4.3	15.5	41.8	38.1	0.3
Family Distribution by Income Level	461,665	21.2	17.3	20.2	41.2	0.0
Household Distribution by Income Level	716,267	23.5	16.6	17.6	42.3	0.0
2018 Updated Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$79,900	Median Housing Value			\$163,785
			Median Gross Rent			\$860
			Families Below Poverty Level			9.1%
Source: 2015 American Community Survey (ACS) Census and 2018 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.						

The bank's Kansas City MO-KS MSA AA consists of the entire counties of Jackson, Clay, Platte, and Cass in Missouri and Johnson and Wyandotte counties in Kansas. The AA is composed of 483 census tracts (CT). There are 78, 107, 149, 130, and 19 CTs for the income levels of low, moderate, middle, upper, and NA, respectively. Total population for the AA is 1,833,061 with 9.1 percent of families living below the poverty level.

Competition for financial services in the AA is strong with 95 institutions operating over 591 offices in the AA. FFBKC operates 12 branches in the AA. According to FDIC market share data as of June 30, 2018, market share percent ranges from a high of 21.36 percent to a low of 0.00 percent. FFBKC ranks 18th among all deposit taking institutions within the AA with a deposit market share of 0.97 percent.

FFBKC competes with branches of nationwide and regional banks, local community banks, credit unions, and other nonbank financial institutions operating in the AA.

Access to affordable housing is limited in LMI geographies and for LMI families. The 2015 ACS US Census reported total housing units in the AA of 786,988. Of the total number of housing units, 464,339 or 59 percent are owner-occupied units; 251,928 or 32.01 percent are occupied rental units, and 70,721 or 8.99 percent are vacant units. Within the low-income geographies, 6.20 percent of the housing units were owner-occupied, 17 percent were occupied rental units, and 27.60 percent were vacant units. The Fannie Mae / Freddie Mac Housing Price Index (HPI) for the Kansas City, MO-KS MSA metro area shows the HPI increasing from 128.74 in 2016 to 137.46 in 2017. The two counties with the highest volume of LMI tracts is Wyandotte County, Kansas and Jackson County, Missouri. Combined they make up 82 percent of the LMI tracts in the AA. The HPI for Wyandotte County increased from 129.87 in 2016 to 141.23 in 2017; for Jackson County, the HPI increased from 128.74 to 137.46 for the same time period. Bank data indicates the 2018 median housing values in the AA was \$204,900, according to the 2018 Q3 National Association of Realtor data. In addition, the median home values, as reported by Zillow.com, for the Kansas City, Kansas and Kansas City, Missouri cities are \$99,400 and \$146,100 respectively with median listing prices of \$125,000 and \$189,000 (both higher than median home values). The median rent prices are \$885 and \$1,000 per month, respectively. With a median family income of \$79,900 for the AA, home values make it difficult for low-income individuals with an income range of \$39,950 or less to qualify for home loans.

Based on data from the Bureau of Labor Statistics, the unemployment rate within in the AA as of December 2018 was 3.10 percent, which is below the national rate of 3.70 percent. Major employers in the AA include the federal government, Cerner Corporation, DST Systems, Inc. Great Plains Energy, Inc. HCA Midwest Health Systems, Saint Luke's Health System, the University of Kansas Hospital, and YRC Worldwide, Inc. According to Moody Analytics, factory payrolls have steadily declined and the high exposure to the auto industry that proved advantageous in the past will see softening auto demand in the years ahead causing producers to pare back hiring or make outright cuts.

We reviewed one recent community contact that identified community needs that include access to affordable home purchase and home repair loans and the need for a CDFI Fund to operate a loan pool to provide loans to those that do not meet traditional credit standards.

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

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/AA. Deposit data are compiled by the FDIC and are available as of June 30 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/AA. The table also presents aggregate peer data for the years the data is available.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18	
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	
2017-18 KC MO-KS MSA	1,389	370,915	100.0	69,698	6.2	2.4	2.6	17.5	10.5	15.0	38.1	38.0	39.5	38.0	48.6	42.7	0.2	0.4	0.2	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18	
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	
2017-18 KC MO-KS MSA	1,389	370,915	100.0	69,698	21.2	7.7	7.2	17.3	16.8	17.5	20.2	22.2	20.8	41.2	51.6	35.9	0.0	1.7	18.5	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data. Due to rounding, totals may not equal 100.

Products/Services/Community Involvement

The Bank serves its community by offering various types of credit and deposit products and services. Lending products include first mortgage loans on 1-4 family dwelling units, FHA and VA financing, second mortgages, home improvement loans, equity lines of credit, construction, boat, auto, and share loans. Deposit products include a suite of free checking account products that offer high interest, cash back or other rewards (such as ATM fee refunds) with qualifying account activity (Kasasa Cash®, Kasasa Cash Back® and Kasasa Tunes®). The Kasasa product suite allows an individual to choose the type of reward that benefits them. Additional products available: DBA/Not-For-Profit, Small Business checking, Money Market accounts, statement savings, certificates of deposit, IRA accounts, and the offering of Kasasa Saver® account of a low minimum opening balance (\$25.00) and high interest rate (with qualifying activity in the Kasasa checking account). The interest earned on Kasasa Cash checking and cash back rewards on a Kasasa Cash Back checking account, along with the ATM fee refunds will automatically sweep to the Kasasa Saver account, promoting an emergency savings plan for the customer. The bank offers a Mobile Banking app to help consumers obtain more control over their finances. Additional services include electronic wire transfer, cashier checks, money orders, notary public service, direct deposit of government payments, MasterCard Debit Card, ATM access to the Cirrus®, Pulse® and “surcharge free” Money Pass® Network, mobile deposit capture and internet banking with bill payment.

The Bank has increased its efforts in meeting the credit needs of its community through several different types of loan products and programs, including offering high loan-to-value ratio conventional loans with private mortgage insurance.

The Bank participates in programs where smaller down payment and in some cases a lower monthly mortgage insurance payment are allowed. This program is targeted to low and moderate-income borrowers however all borrowers do not need to be first time homebuyers. First time homeowners are no longer required but are encouraged to attend a half-day counseling session. In 2016, the bank developed a Community Loan Program (see attached flyer for more details).

First Federal recognizes that many of our customers wish to initiate a home loan application via the Internet rather than face-to-face, by telephone, or by mail. Although First Federal encourages face-to-face applications, Internet applications are permitted as a convenience to our customers.

The bank also participates in bond programs in the states of Kansas and Missouri for the first time homebuyer. There are income limitations based on family size for target and non-target areas. Each state also has a maximum sales price.

First Federal's lending operations also include participation in the Missouri Housing Development Commission (MHDC) First Place Home Loan Program (MRB-CAP) and (MRB-NON CAP). The bank participates in the National Homebuyers Fund (NHF). In 2016, the bank had the number one loan originator of MHDC loans.

In the fall of 2006, the bank began its participation in the Sedgwick County, Kansas and Shawnee County, Kansas Single Family Mortgage Revenue Bond Program (when funds are available).

An additional program the bank is now offering is guaranteed by the Rural Housing Service an agency of the Department of Agriculture (USDA) for properties located in Missouri which provides assistance to low-to-moderate income families with income equal to or less than 115% of the area's median income. On June 30, 2009 the bank's Board of Directors ratified its Designation of Approved Lender Status for Kansas for USDA Rural Development loan program. On November 27, 2013, the bank was approved for participation in the USDA Rural Development Single Family Housing Guaranteed Loan Program (SFHGLP) on a nationwide basis.

In 2018, First Federal Bank donated to organizations that assist homeless individuals including \$5000 to ReStart and \$5,000 to Hillcrest Transitional Housing. The bank donated to organizations providing financial education including \$10,000 to Habitat for Humanity Kansas City, \$5,000 to Truman Heritage Habitat for Humanity, \$5,000 to CHES, Inc., \$5,000 to El Centro, \$2,500 to Catholic Charities of Northeast Kansas, \$5,000 to Greater Kansas City LISC, and \$1,000 to MoneySmart KC. In addition, First Federal Bank donated \$10,000 to the Bright Futures Fund \$5,000 to Donnelly College in support of student services. The bank supported Rebuilding Together Kansas City with \$5,000 for home rehabilitation projects. Additional donations were \$2,500 to Westside Housing Organization and \$5,000 to The Grooming Project, \$5,000 to Salvation Army, \$5,000 to Sheffield Place and \$5,000 to City Union Mission.

In 2017, First Federal Bank donated to organizations that assist homeless individuals including \$5000 to ReStart and \$5,000 to Hillcrest Transitional Housing. The bank donated to organizations providing financial education including \$10,000 to Habitat for Humanity Kansas City, \$5,000 to Truman Heritage Habitat for Humanity, \$5,000 to CHES, Inc., \$5,000 to El Centro, \$5,000 to CHWC, \$2,500 to Catholic Charities of Northeast Kansas, \$2,500 to Catholic Charities Kansas City/St. Joseph, \$1,000 to Greater Kansas City LISC, and \$1,000 to MoneySmart KC. In addition, First Federal Bank donated \$10,000 to the Bright Futures Fund \$5,000 to Donnelly College, \$2,500 to YMCA, and \$500 to Frontier School in support of student services. The bank supported Rebuilding Together Kansas City with \$5,000 for home rehabilitation projects.

In 2016, First Federal donated \$10,000 to the Bright Futures Fund, \$10,000 to Heartland Habitat for Humanity and \$10,000 to Rebuilding Together Clay County. In addition, the bank donated \$5,000 to Heartland Habitat for Humanity, \$5,000 to Truman Heritage Habitat for Humanity, \$5,000 to CHES and \$5,000 to Greater Kansas City LISC.

The bank is participating in the First Time Home Buyer programs in the cities of Blue Springs and Lee's Summit, Mo.

First Federal Bank of Kansas City is committed to providing deposit services and meeting the credit needs of our community, including low and moderate-income groups. In April 2016, the bank hosted its first annual housing symposium to meet with housing organizations and community leaders in the Kansas City urban core. The annual housing symposium provides a forum of dialogue for the bank to promote its current products and services and receive suggestions on how the bank can improve its home financing options for Kansas City residents. In keeping with this tradition of community interest, our goal and commitment is to truly become a full "Family Financial Center". First Federal Bank hosted the second annual housing symposium in February 2017 and the third in February 2018. Attendance increased by 11% over the first year and increased by 20% over the second year. The number of organizations represented increased by 15% in the second year and increased another 13% in the third year. This increase provided the bank with greater feedback on the needs facing the community and how assistance can be provided.

The First Federal Management team has adopted a program of self-assessment by continuous monitoring of loan applications denied and loans originated. The monitoring program includes current geocoding analysis to indicate lending trends within the assessment area for both mortgage loans and consumer loans. The compliance officer performs this monitoring and assessment.

Concentrated efforts are made to determine the needs of our community and ultimately market products to fill those needs.

ASSESSMENT AREA

The assessment area is composed of all of Jackson, Clay, Platte and Cass counties in Missouri, and all of Johnson and Wyandotte counties in Kansas.

A map located in the CRA Public File reflects the delineation of the boundaries.

LIST OF BRANCHES, LOAN PRODUCTION OFFICES AND HOURS OF OPERATION

LOCATION	DEPOSIT/LOAN SERVICE	HOURS
	[GEOGRAPHY]	
First Federal Bank of Kansas City 6900 Executive Dr. Kansas City, Mo 64120	Loan plus ATM [low tract] [29 095 0155.00]	Lobby: Mon.-Fri. 9:00-4:00 Sat. Closed Drive-up: None
First Federal Bank of Kansas City 1200 Armour Rd. N. Kansas City, Mo 64116	Both plus ATM [moderate tract] [29 047 0221.00]	Lobby: Mon.-Fri. 9:00---5:00 Sat. 9:00---Noon Drive-up: Mon.-Fri. 8:00---6:00 Sat. 8:00---Noon
First Federal Bank of Kansas City 4227 Blue Ridge Blvd. Kansas City, Mo 64133	Both plus ATM [moderate tract] [29 095 0107.02]	Lobby: Mon.-Fri. 9:00---5:00 Sat. 9:00---Noon Drive-up: Mon.-Fri. 8:00---6:00 Sat. 8:00---Noon
First Federal Bank of Kansas City 9330 E. Gregory Raytown, MO 64133	Both plus ATM [moderate tract] [29 095 0126.00]	Lobby: Mon.-Fri. 9:00---5:00 Sat. 9:00---Noon Drive-up: Mon.-Fri. 8:00---6:00 Sat. 8:00---Noon
First Federal Bank of Kansas City 8308 N. W. Prairie View Rd. Kansas City, Mo 64151	Both plus ATM [middle tract] [29 165 0302.09]	Lobby: Mon.-Fri. 9:00---5:00 Sat. 9:00---Noon Drive-up: Mon.-Fri. 8:00---6:00 Sat. 8:00---Noon
First Federal Bank of Kansas City 3500 S. Noland Rd. Independence, MO 64055	Both plus ATM [middle tract] [29 095 0122.00]	Lobby: Mon.-Fri. 9:00---5:00 Sat. 9:00---Noon Drive-up: Mon.-Fri. 8:00---6:00 Sat. 8:00---Noon

**LIST OF BRANCHES, LOAN PRODUCTION OFFICES AND HOURS OF OPERATION
(CONTINUED)**

LOCATION	DEPOSIT/LOAN SERVICE	HOURS
	[GEOGRAPHY]	
First Federal Bank of Kansas City 1255 SE Oldham Pkwy. Lee's Summit, MO 64081	Both plus ATM [upper tract] [29 095 0138.02]	Lobby: Mon.-Fri. 9:00---5:00 Sat. 9:00---Noon Drive-up: Mon.-Fri. 8:00---6:00 Sat. 8:00---Noon
First Federal Bank of Kansas City 711 Minnesota Ave Kansas City, KS 66101	Both [low tract] [20 209 0418.00]	Lobby: Mon. - Fri. 9:00---5:00 Drive-up: None
First Federal Bank of Kansas City 1919 N. 78 St. Kansas City, KS 66112	Both [low tract] [20 209 0441.04]	Lobby: Mon.-Fri. 9:00---5:00 Sat. 9:00---Noon Drive-up: Mon.-Fri. 8:00---6:00 Sat. 8:00---Noon
First Federal Bank of Kansas City 132 Oak St. Bonner Springs, KS 66012	Both [middle tract] [20 209 0449.00]	Lobby: Mon.-Fri. 9:00---5:00 Drive-up: None
First Federal Bank of Kansas City 8629 Metcalf Ave. Overland Park, KS 66212	Both [middle tract] [20 091 0518.02]	Lobby: Mon.-Fri. 9:00---5:00 Sat. 9:00---Noon Drive-up: Mon.-Fri. 8:00---6:00 Sat. 8:00---Noon
First Federal Bank of Kansas City 8000 State Line Rd Leawood, KS 66206	Both [upper tract] [20 091 0515.00]	Lobby: Mon.-Fri. 9:00---5:00 Sat. 9:00---Noon Drive-up: Mon.-Fri. 8:00---6:00 Sat. 8:00---Noon

**BRANCHES OPENED OR CLOSED DURING THE CURRENT AND TWO PRIOR
CALENDAR YEARS**

Closed: February 28, 2018

First Federal Bank
Loan Production Office
7285 W. 132 St., Suite 100
Overland Park, KS 66213
[20 091 0532.03]

WRITTEN CRA COMMENTS FROM THE PUBLIC
FOR THE CURRENT AND PRIOR TWO CALENDAR YEARS.

None

CRA DISCLOSURE STATEMENT

None received from the OCC as of March 2019

First Federal Bank
 Loan to deposit ratio calculation

Period	12/31/2017	3/31/2018	6/30/2018	9/30/2018	12/31/2018
Mortgage loans SC26	19,865	18,766	20,908	17,851	18,443
	496,343	518,977	553,151	574,233	604,284
Nonmortgage loans SC31	516,208	537,743	574,059	592,084	622,727
Deposits SC710	495,650	511,406	520,407	521,130	518,453
Ratio of loans to deposits	104.1%	105.1%	110.3%	113.6%	120.1%

HOME MORTGAGE DISCLOSURE ACT NOTICE

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's Web site (www.consumerfinance.gov/hmda). HMDA data for many other financial institutions are also available at this Web site.

CHECKING ACCOUNTS

All checking accounts include monthly electronic statements delivered through Online Banking at no charge. Paper statements sent by mail are available for \$3 per month. (Paper statement fee waived for Kassasa* accounts, or if you maintain a \$400 daily balance in your account, or have a total household deposit balance of \$25,000 or more.)

	MIN. OPENING BALANCE	MIN. DAILY BALANCE TO AVOID FEE	MONTHLY SERVICE FEE
Kassasa Cash*	\$25	\$0	\$0
Kassasa Cash-Back*	\$25	\$0	\$0
Kassasa Tunes*	\$25	\$0	\$0
DBA/Non-Profit Checking*	\$100	\$0	\$0
First Business Checking*	\$100	\$0	\$0
Business Interest Checking*	\$100	\$2,000	\$12

*250 free transactions per statement, then \$0.25 per item. Pre-inked endorsement stamp required, minimum \$14 or actual cost.

SAVINGS ACCOUNTS

All savings accounts include monthly electronic statements delivered through Online Banking at no charge. Paper statements sent by mail are available for \$3 per month. (Paper statement fee waived for Kassasa* accounts, or if you maintain a \$400 daily balance in your account, or have a total household deposit balance of \$25,000 or more.)

	MIN. OPENING BALANCE	MIN. DAILY BALANCE TO AVOID FEE	MONTHLY SERVICE FEE	WITHDRAWAL LIMITATION
Kassasa Saver*	\$25	N/A	N/A	6 free per account cycle then \$1 each*
Statement Savings	\$200	\$200	\$3	6 free per account cycle then \$1 each*
Minor Savings (under age 18)	\$25	N/A	N/A	6 free per account cycle then \$1 each*
Money Market Savings	\$1,000	\$1,000	\$5	6 free per account cycle then \$10 fee for excess withdrawals*
Relationship Money Market**	\$1,000	\$0	\$0	6 free per account cycle then \$10 fee for excess withdrawals*
Business Statement Savings	\$200	\$200	\$3	6 free per account cycle then \$1 each*
Business Money Market Savings	\$2,500	\$2,500	\$10	6 free per account cycle then \$10 fee for excess withdrawals*

*Withdrawal limitation applies to all transaction types, except ATM, which are unlimited. **Requires at least 1 automated transfer per statement cycle from an EFB checking account in increments of \$25 or more. \$3 monthly service fee waived. **Requires e-Statements. Must have an active First Federal Bank mortgage in good standing that is owned or serviced by the bank to be eligible for this account.

ACCOUNT FEES

Statements: E-Statement (via Internet Banking) Free
Paper Statement (via mail) \$3 per cycle
Dormant Fee on accounts with no deposit, withdrawal or transfer activity: Checking - 1 year \$7.50 per mo.
Savings - 2 years \$7.50 per mo.
Money Market Excess Transactions \$10 per mo. (up to 6 free per month)
Savings Account Excess Transactions \$1 each (up to 6 free per month)
Funds Transfers: Internet Banking Free
Telephone (24-Hour Automated Line) Free

Insufficient Funds/Overdraft/Returned/Uncollected/Account Closed, Checks, ACH, Point of Sale, ATM and Bill Payments: Item Honored (Over \$5.00) \$35
Item Returned (Over \$5.00) \$35
Consecutive Days Overdrawn \$5 per day
Overdraft Protection Transaction \$10 (transfer from savings account)
Passbook/CD Replacement Charge \$5
For Business Accounts Only: Pre-inked endorsement stamp \$14 min., or actual cost

ATM & DEBIT CARD FEES
First Federal & MoneyPass ATMs Free
Non First Federal ATMs (May be subject to other bank service charges) \$2
Withdrawals and Balance Inquiries \$2
Card Replacement \$7.50
Pin Reissues \$5
Foreign Country Transactions up to 1%

BANK SERVICES
Deposit Verification of Payment \$10
Guaranteed Signature \$10
Notary Services: First Federal Customers Free
Non-Customers \$2 per signature
Research \$25 per hour, \$5 min.
Statement Balancing \$25 per hour, \$5 min.
Abandoned Account Research \$25

CHECKS
Allen Media Reject Fee \$5 per check
Cashier Checks \$5
Check Printing (fee depends on style of check) \$2
Counter Check (per sheet) \$2

CHECKS, continued

Money Orders \$2
On-Us Check Cashing (non-customers): 1% of check, \$10 max.
Return Deposited Item: Charge-Back \$10
Re-Clear \$11

LOAN SERVICING FEES
Loan Document Copies (per request) \$5
Faxed Payoff Report \$15
Loan Payment Returned (NSF) \$35

MISCELLANEOUS FEES
Coin Sorting and Counting: First \$30 Free
Amounts over \$30 10% of amt. over \$30
Minor Accounts Free
Collections: Account (overdrawn closed) \$35
Checks, Drafts & Foreign Items \$35 to \$95 (min. + actual costs)
Canadian checks or drafts \$22

Copies: Balance History \$1
Check (Paid, Deposited) \$2
Statement \$5
1098 and/or 1099 \$5
Debit Card receipts \$15
Other \$2 min.
Additional pages over 4 \$0.25 per page
Fax (in or out - per page) \$5
Carwashment/Levy Processing \$75
Night Deposit: Locking Depository Bag \$25
Zipper Depository Bag \$5
Key Replacement \$5
Stop Payments and Renewals \$35
(Checks, ACH, Money Orders, Bill Payments)

SAFE DEPOSIT BOXES
(Available at Blue Ridge Banking Center)
Annual Rental Fees: 3 x 10 \$45
5 x 10 \$65
10 x 10 \$105
Drilling Fee \$150 min.
Lost Key Fee \$15
Insufficient Funds for Annual Fee \$35

WIRE TRANSFERS
Incoming Wire \$15
Outgoing Wire \$25