



To: FHFA  
From: Jack Muench, President & CEO  
First Independent Bank, Aurora, Missouri  
Subject: Comment regarding FHLB System  
Date: 3/28/23

To Whom It May Concern:

I would like to start by saying that as a member of the FHLB System, and the ability we have to work with Mr. Rich Weaver, our Senior Relationship Manager, at FHLB of Des Moines (The Bank), we are able to count on The Bank to provide a secondary source of funding that has been an integral part of our contingency funding plan since we have been a member of the system. The importance of the contingency funding has been especially important over the last three weeks during the recent national banking crisis. Also, we have utilized FHLB advances since the fourth quarter of 2022 as a funding source to allow us to continue making loans during a time of liquidity challenges as deposits have been moving in search of higher rates during the recent rapid rising interest rate environment. We would likely have been forced to reduce our normal level of lending had it not been for FHLB of Des Moines. At the present time 44.51% of our total loans are 1-4 family homes.

In addition, we have utilized the grant program through The Bank to provide down payment assistance for a customer that had completed a local personal financial assistance program, which between these two resources allowed her to purchase a home for the first time. She would have been unable to purchase the home without the down payment assistance.

I would also ask that you not require the tracking of Advance Proceeds, as it would be impractical and cost prohibitive for our bank due to our size and staffing challenges.

Sincerely,

A handwritten signature in blue ink that reads 'Jack'.

Jack Muench  
President

JM/jlw