PUBLIC DISCLOSURE

November 30, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Bank
Certificate Number: 4092

118 West Roger Miller Boulevard
Erick, Oklahoma 73645

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Dallas Regional Office

600 North Pearl Street, Suite 700
Dallas, Texas 75201

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, nor should it 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.

TABLE OF CONTENTS

INSTITUTION RATING 1
DESCRIPTION OF INSTITUTION 1
DESCRIPTION OF ASSESSMENT AREAS 2
SCOPE OF EVALUATION 2
CONCLUSIONS ON PERFORMANCE CRITERIA 4
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW 6
OKLAHOMA NON-MSA AA – Full-Scope Review 6
TULSA MSA AA – Full-Scope Review 10
APPENDICES 13
SMALL BANK PERFORMANCE CRITERIA 13
GLOSSARY 14

INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory.**

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment areas (AAs), including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

- The loan-to-deposit ratio (LTD) is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and AAs' credit needs.
- A majority of loans are in the institution's AAs.
- The geographic distribution of loans reflects reasonable dispersion throughout the AAs.
- The distribution of borrowers reflects, given the demographics of the AAs, reasonable penetration among businesses of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the institution's rating.

DESCRIPTION OF INSTITUTION

First Bank, headquartered in Erick, Oklahoma, remains wholly owned by Erick Bancshares, Inc., a one-bank holding company also located in Erick. First Bank received a Satisfactory rating at its previous Federal Deposit Insurance Corporation (FDIC) Performance Evaluation, dated November 16, 2015, based on Small Institution Procedures.

First Bank functions as a retail bank operating four full-service offices in Oklahoma. The bank did not open or close any branches or engage in any merger or acquisition activity since the prior evaluation. The institution offers various loan products including commercial, home mortgage, agricultural, and consumer loans, primarily focusing on commercial lending. First Bank also offered loans through the Small Business Administration (SBA) Paycheck Protection Program (PPP), with 137 PPP loans totaling $14.4 million originated during the evaluation period. The institution provides a variety of deposit services including checking, savings, money market, certificate of deposit, and individual retirement accounts. Alternative delivery systems include online banking, mobile banking, electronic bill pay, and four automated teller machines.

As of September 30, 2021, the bank reported total assets of $98.1 million, total loans of $57.9 million, and total deposits of $87.4 million. Since the prior evaluation, total assets increased by 24.0 percent, total loans increased by 23.3 percent, and total deposits increased by 23.7 percent. The following table illustrates the outstanding loan portfolio as of September 30, 2021, reflecting a distribution supportive of the institution's business focus, with commercial loans representing the largest portion of the loan portfolio.

Loan Portfolio Distribution as of 9/30/2021		
Loan Category	**$(000s)**	**%**
Construction, Land Development, and Other Land Loans	1,471	2.5
Secured by Farmland	6,784	11.7
Secured by 1-4 Family Residential Properties	7,988	13.8
Secured by Multifamily (5 or more) Residential Properties	0	0.0
Secured by Nonfarm Nonresidential Properties	6,775	11.7
Total Real Estate Loans	**23,018**	**39.7**
Commercial and Industrial Loans	25,247	43.6
Agricultural Production and Other Loans to Farmers	6,415	11.1
Consumer Loans	3,399	5.9
Obligations of State and Political Subdivisions in the U.S.	294	0.5
Other Loans	273	0.5
Lease Financing Receivable (net of unearned income)	75	0.1
Less: Unearned Income	(799)	(1.4)
Total Loans	**57,922**	**100.0**
Source: Reports of Condition and Income.		

Examiners did not identify any financial, legal, or other impediments that affect the institution's ability to meet the credit needs of its AAs.

DESCRIPTION OF ASSESSMENT AREAS

First Bank designated two AAs within the State of Oklahoma: a portion of the Oklahoma Non-Metropolitan Statistical Area (Oklahoma Non-MSA) and a portion of the Tulsa, Oklahoma Metropolitan Statistical Area (Tulsa MSA). The bank expanded both AAs from partial to full counties since the prior evaluation. The AAs meet the technical requirements of the CRA. Please refer to the individual AAs' sections for additional details.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated November 16, 2015, to the current evaluation dated November 30, 2021. To assess performance, examiners applied the CRA Small Institution Procedures, which include the Lending Test. The appendix lists the test's criteria.

As illustrated in the following table, the Oklahoma Non-MSA AA contains a large majority of the institution's loans and deposits as well as a majority of the bank's branches. Consequently, examiners used full-scope procedures and weighed performance more heavily in the Oklahoma Non-MSA AA when arriving at conclusions and the rating.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	**Loans**		**Deposits**		**Branches**	
	$(000s)	**%**	**$(000s)**	**%**	**#**	**%**
Oklahoma Non-MSA	6,951	87.5	70,846	83.9	3	75.0
Tulsa MSA	991	12.5	13,575	16.1	1	25.0
Total	**7,942**	**100.0**	**84,421**	**100.0**	**4**	**100.0**
Source: Bank Small Business Loan Data 2020; FDIC Summary of Deposits 6/30/2020; Bank Data.						

Examiners also applied full-scope procedures to the Tulsa MSA AA due to AA composition changes since the previous evaluation and since the AA has not yet received full-scope review. However, the Tulsa MSA AA reflects a low volume of lending and deposit activity and received very little weight when drawing conclusions.

Activities Reviewed

Small Institution Procedures require examiners to determine the bank's major product lines for review. As an initial matter, examiners may select from the same loan categories used for CRA Large Institution evaluations: home mortgage, small business, small farm, and consumer loans. The following table details the bank's originations and purchases over the most recent completed calendar year by loan type.

Loans Originated or Purchased				
Loan Category	**$(000s)**	**%**	**#**	**%**
Construction and Land Development	1,568	2.7	9	1.2
Secured by Farmland	1,358	2.4	9	1.2
Secured by 1-4 Family Residential Properties	2,394	4.2	19	2.6
Multi-Family (5 or more) Residential Properties	0	0.0	0	0.0
Commercial Real Estate Loans	717	1.3	5	0.7
Commercial and Industrial Loans	43,431	76.3	273	37.6
Agricultural Loans	5,127	9.0	123	17.0
Consumer Loans	2,317	4.1	288	39.6
Other Loans	16	<0.1	1	0.1
Total Loans	**56,928**	**100.0**	**727**	**100.0**
Source: Bank Data 2020.				

Considering the dollar volume and number of loans originated during 2020, as well as management's stated business strategy, examiners determined that commercial loans represent the bank's major product line. Since home mortgage, agricultural, and consumer loans represent nominal percentages by dollar volume and would not materially affect conclusions or the rating, this evaluation does not include a review of them. Bank records indicate the lending focus and product mix remained generally consistent throughout the evaluation period. However, commercial lending increased in 2020 due to demand resulting from the COVID-19 pandemic and loans made through the PPP.

Considering this information, this evaluation includes a review of small business loans originated or purchased in 2020, which represents the most recent completed calendar year of available data.

To assess AA concentration, examiners evaluated the entire universe of 268 small business loans totaling $17.8 million, given the readily available data. Examiners then evaluated all 178 small business loans totaling $7.9 million originated inside the AAs when assessing geographic distribution. For the borrower profile analysis, readily available data regarding gross annual revenues did not exist to review the entire universe of loans in the AAs. Therefore, examiners selected a random sample of 55 small business loans totaling $2.8 million from the universe of 268 small business loans. The sample resulted in 33 small business loans totaling $1.5 million inside the Oklahoma Non-MSA AA and 2 small business loans totaling $64,000 inside the Tulsa MSA AA. However, due to the low volume of small business loans in the sample from the Tulsa MSA AA, examiners evaluated the entire universe of 9 small business loans totaling $991,000 originated in the Tulsa MSA AA to assess borrower profile. D&B data for 2020 provided the standard of comparison for the small business loans.

Examiners confirmed that no other loan products typically reviewed for CRA represented a significant volume in the Tulsa MSA AA. Examiners also determined the bank is appropriately serving the AA's credit needs, and the lending level in this AA is reasonable when considering the bank's ability and capacity to serve the AA.

While the evaluation presents both the number and dollar volume of loans, examiners emphasized performance by number of loans, because the number of loans better indicates the number of businesses served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

First Bank demonstrated a satisfactory record regarding the Lending Test. Reasonable records regarding borrower profile, geographic distribution, and the LTD ratio, as well as a majority of loans originated inside the AAs support this conclusion.

Loan-to-Deposit Ratio

The LTD ratio is reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and AAs' credit needs. The LTD ratio averaged 74.5 percent over the past 24 calendar quarters from December 31, 2015, to September 30, 2021, representing a significant increase from the 37.5 percent average net LTD ratio at the prior evaluation. The ratio ranged from a high of 83.3 percent as of June 30, 2020, to a low of 64.5 percent as of September 30, 2021.

Examiners identified and listed in the following table two comparable institutions operating within the bank's AAs and reporting similar asset sizes and lending emphases. As illustrated, First Bank's average net LTD ratio remains within a reasonable range, yet rises slightly above, the next closest comparable institution's ratio.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	**Total Assets as of 9/30/2021 ($000)**	**Average Net LTD Ratio (%)**
First Bank - Erick, Oklahoma	**98,070**	**74.5**
First State Bank - Tahlequah, Oklahoma	67,882	71.5
FNB - Coweta, Oklahoma	101,172	48.0
Source: Reports of Condition and Income 12/31/2015 - 9/30/2021.		

Assessment Area Concentration

A majority of loans are in the institution's AAs. As seen in the following table, a majority of small business loans, by number, originated inside the AAs primarily supports this conclusion. By dollar volume, the bank originated slightly less than a majority of small business loans inside the AAs. However, examiners considered additional performance context data indicating a notable volume of the loans originated inside the AAs were primarily low dollar SBA PPP loans, thus skewing the data by dollar volume. Given this information, the performance by dollar volume did not adversely affect the conclusion for this criteria.

Lending Inside and Outside of the Assessment Areas										
Loan Category	**Number of Loans**					**Dollar Amount of Loans $(000s)**				
	Inside		**Outside**		**Total**	**Inside**		**Outside**		**Total**
	#	**%**	**#**	**%**	**#**	**$**	**%**	**$**	**%**	**$(000s)**
Small Business	178	66.4	90	33.6	268	7,942	44.5	9,894	55.5	17,836
Source: Bank Data 2020.										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AAs. Reasonable performance in the Oklahoma Non-MSA AA supports this conclusion. Given the minimal weighting applied to the Tulsa MSA AA, the poor performance in this AA did not adversely impact the overall conclusion for this criterion. Examiners focused the analysis on the percentage by number of loans in low- and moderate-income census tracts inside the AAs relative to the available comparative data and any performance context issues when arriving at conclusions.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AAs, reasonable penetration among businesses of different sizes. Reasonable performance in the Oklahoma Non-MSA AA and Tulsa MSA AA supports this conclusion. Examiners focused on the percentage by number of loans to businesses with gross annual revenue of $1 million or less within the AAs when arriving at conclusions.

Response to Complaints

The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the institutions' rating.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

OKLAHOMA NON-MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN OKLAHOMA NON-MSA AA

The Oklahoma Non-MSA AA includes all of Beckham, Cherokee, Mayes, and Muskogee counties. Since the prior evaluation, the bank expanded the AA from partial to full counties, resulting in the addition of 27 census tracts, including 2 low- and 4 moderate-income tracts.

Consistent with the prior evaluation, the Oklahoma Non-MSA AA includes two non-contiguous areas, with Beckham County located in Western Oklahoma and Cherokee, Mayes, and Muskogee counties located in the eastern Oklahoma. However, since examiners did not identify any anomalies in performance between the two non-contiguous areas, this evaluation combines them for presentation purposes. The bank operates three full-service branches in the AA, including the main office in Beckham County and two full-service branches in Mayes County.

Economic and Demographic Data

The AA's 38 census tracts reflect the following income designations based on the 2015 American Community Survey (ACS) data: 2 low-, 5 moderate-, 23 middle-, and 8 upper-income tracts. The following table illustrates select demographic and business data for this AA.

Demographic Information of the Assessment Area Oklahoma Non-MSA Assessment Area						
Demographic Characteristics	**#**	**Low**	**Moderate**	**Middle**	**Upper**	**NA***
		% of #	**% of #**	**% of #**	**% of #**	**% of #**
Geographies (Census Tracts)	38	5.3	13.2	60.5	21.1	0.0
Population by Geography	182,628	1.9	12.4	62.1	23.6	0.0
Housing Units by Geography	81,621	1.9	12.7	63.5	21.9	0.0
Owner-Occupied Units by Geography	44,908	1.0	9.0	65.5	24.6	0.0
Occupied Rental Units by Geography	21,040	3.8	20.0	55.9	20.3	0.0
Vacant Units by Geography	15,673	2.2	13.6	67.9	16.3	0.0
Businesses by Geography	10,978	7.5	15.3	53.3	23.9	0.0
Farms by Geography	596	1.5	6.2	62.6	29.7	0.0
Family Distribution by Income Level	44,735	23.3	16.7	19.8	40.2	0.0
Household Distribution by Income Level	65,948	25.7	16.1	16.5	41.7	0.0
Median Family Income - OK Non-MSA	$51,491		Median Housing Value Median Gross Rent Families Below Poverty Level			$102,783 $625 15.8%
Source: 2015 ACS Data 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.*						

The area's major employers, based on county data, include Cherokee Nation Industries, US Department of Veterans Affairs, Saint Francis Health System, and local area school districts. The following table lists annual unemployment rates over the evaluation period for the AA, State of Oklahoma, and nationwide. The economic outlook and unemployment level changed significantly in April 2020 due to the national state of emergency related to the COVID-19 pandemic. Unemployment levels increased sharply at the onset of the pandemic in March 2020, but declined gradually, although year-end 2020 levels remained above levels posted in 2019.

Annual Unemployment Rates Oklahoma Non-MSA Assessment Area					
Area	**2016**	**2017**	**2018**	**2019**	**2020**
	%	**%**	**%**	**%**	**%**
Beckham County	5.6	2.9	2.3	3.9	6.1
Cherokee County	5.5	4.6	4.0	3.4	4.7
Mayes County	5.0	4.1	2.9	2.5	4.4
Muskogee County	5.2	4.6	3.5	3.2	5.0
State of Oklahoma	4.3	3.6	3.0	2.8	4.6
Nationwide	4.5	3.9	3.7	3.4	6.5
Source: Bureau of Labor Statistics.					

Competition

The AA reflects a moderate level of competition for financial services. According to the FDIC Deposit Market Share report as of June 30, 2021, 26 financial institutions operate 61 offices within the AA. Of these institutions, First Bank ranked 16th with a 1.8 percent deposit market share. Overall, the competition level allows for lending opportunities.

Community Contact

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying the credit and community needs. This information helps determine financial institutions' responsiveness to these needs and shows available credit opportunities.

Examiners contacted a representative of an economic development organization located in the AA. The contact described stable economic conditions throughout the area prior to the COVID-19 pandemic. The contact noted that since the pandemic, the area experienced an economic downturn and elevated unemployment rates, with small businesses experiencing the greatest economic repercussions. The contact noted that many small businesses closed and some continue to struggle due to increased cost of goods and decreased demand. As a result, the contact indicated that small business lending represents the primary credit need of the area. Overall, the contact noted that local financial institutions do a good job of meeting area credit needs.

Credit Needs

Considering information obtained from the community contact, bank management, as well as demographic and economic data, examiners determined that small business loans represent the primary credit need of the Oklahoma Non-MSA AA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN OKLAHOMA NON-MSA AA

LENDING TEST

First Bank demonstrated a satisfactory record in the Oklahoma Non-MSA AA regarding the Lending Test. Reasonable records regarding geographic distribution and borrower profile support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the Oklahoma Non-MSA AA. Reasonable performance regarding small business lending supports this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the Oklahoma Non-MSA AA. As reflected in the following table, the bank did not originate any small business loans in low-income census tracts. However, the demographic data indicates only 7.5 percent of businesses are located in the low-income areas, which evidences limited opportunity for lending, thereby reflecting a reasonable level. The bank's level of lending in moderate-income census tracts trailed demographic data by 5.2 percentage points, also evidencing reasonable performance.

Geographic Distribution of Small Business Loans Oklahoma Non-MSA Assessment Area					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Low	7.5	0	0.0	0	0.0
Moderate	15.3	17	10.1	428	6.2
Middle	53.3	132	78.1	3,874	55.7
Upper	23.9	20	11.8	2,649	38.1
Totals	**100.0**	**169**	**100.0**	**6,951**	**100.0**
Source: D&B Data 2020, Bank Data 2020.					

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among businesses of different sizes in the Oklahoma Non-MSA AA. Reasonable performance regarding small business loans supports this conclusion.

Small Business Loans

The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among businesses of different sizes in the Oklahoma Non-MSA AA. The following table shows that First Bank granted more than five out of every ten small business loans to businesses with gross annual revenue of $1 million or less, reflecting reasonable performance. Additionally, the bank originated a notable percentage of its small business loans to businesses in the two smallest gross annual revenue categories.

Distribution of Small Business Loans by Gross Annual Revenues Oklahoma Non-MSA Assessment Area					
Gross Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
< $100,000	50.2	6	18.2	149	10.2
$100,000 - $249,999	21.6	10	30.3	244	16.6
$250,000 - $499,999	6.3	0	0.0	0	0.0
$500,000 - $1,000,000	3.7	1	3.0	20	1.4
Subtotal <= $1,000,000	**81.8**	**17**	**51.5**	**413**	**28.2**
>$1,000,000	4.7	0	0.0	0	0.0
Revenue Not Available	13.5	16	48.5	1,054	71.8
Total	**100.0**	**33**	**100.0**	**1,467**	**100.0**
Source: D&B Data 2020, Bank Data 2020.					

A significant portion of the small business loans did not have revenue information available, which skews the data. A review of loans without revenue information indicated they were SBA PPP loans originated in response to the COVID-19 pandemic. Banks were not required to obtain revenue information for PPP loans given the program's requirements. Excluding the 16 PPP loans with revenues not available from the analysis, the bank made all of the sampled small business loans to businesses with gross annual revenue of $1 million or less. Examiners further evaluated the 16 PPP loans without revenue information using loan size as a proxy. The data shows that 14 loans

reflected loan amounts under $100,000, further indicating that the bank is helping to serve the needs of the smallest businesses in the AA.

TULSA MSA AA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TULSA MSA AA

The Tulsa MSA AA includes all of Wagoner County. The bank expanded the AA since the prior evaluation, from 9 census tracts to all 22 census tracts comprising Wagoner County. The expansion did not change the number of low- or moderate-income census tracts in the AA. The bank continues to operate one full-service branch in the AA.

Economic and Demographic Data

The AA's 22 census tracts reflect the following income designations based on 2015 ACS data: 3 moderate-, 14 middle-, and 5 upper-income tracts. The following table provides select demographic data for this AA.

Demographic Information of the Assessment Area Tulsa MSA Assessment Area						
Demographic Characteristics	**#**	**Low**	**Moderate**	**Middle**	**Upper**	**NA***
		% of #	**% of #**	**% of #**	**% of #**	**% of #**
Geographies (Census Tracts)	22	0.0	13.6	63.6	22.7	0.0
Population by Geography	75,391	0.0	15.7	61.1	23.1	0.0
Housing Units by Geography	30,486	0.0	19.1	60.0	21.0	0.0
Owner-Occupied Units by Geography	21,888	0.0	13.9	61.1	25.1	0.0
Occupied Rental Units by Geography	5,564	0.0	30.0	60.2	9.8	0.0
Vacant Units by Geography	3,034	0.0	36.6	51.5	11.9	0.0
Businesses by Geography	4,622	0.0	13.0	60.8	26.2	0.0
Farms by Geography	281	0.0	4.6	75.1	20.3	0.0
Family Distribution by Income Level	20,722	17.5	18.2	22.7	41.7	0.0
Household Distribution by Income Level	27,452	19.2	14.9	19.4	46.4	0.0
Median Family Income - Tulsa, OK MSA	$61,182		Median Housing Value Median Gross Rent Families Below Poverty Level			$132,255 $796 8.1%
Source: 2015 ACS Data 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.						

According to Wagoner County data, major employers include Coweta Public Schools, Exterran Energy Solutions, Blue Bell, and Wagoner Public Schools. The following table lists annual unemployment rates over the evaluation period for the AA, State of Oklahoma, and nationwide. Unemployment levels increased sharply at the onset of the pandemic in March 2020, but declined gradually, although year-end 2020 levels remain above levels posted in 2019.

Annual Unemployment Rates Tulsa MSA Assessment Area					
Area	2016	2017	2018	2019	2020
	%	%	%	%	%
Wagoner County	4.4	3.7	3.0	2.7	4.6
State of Oklahoma	4.3	3.6	3.0	2.8	4.6
Nationwide	4.5	3.9	3.7	3.4	6.5
Source: Bureau of Labor Statistics					

Competition

The bank's Tulsa MSA AA reflects a low level of competition. According to the FDIC Deposit Market Share report as of June 30, 2021, 8 financial institutions operate 11 offices within Wagoner County. Among these institutions, First Bank ranked seventh with a 2.7 percent deposit market share. However, when considering the entire Tulsa MSA, the bank faces a greater level of competition.

Credit Needs

Considering information from bank management and demographic and economic information, examiners determined commercial lending, especially for small businesses, represents a primary credit need of the area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN TULSA MSA AA

LENDING TEST

First Bank demonstrated a satisfactory record in the Tulsa MSA AA regarding the Lending Test. A poor record regarding geographic distribution and a reasonable record regarding borrower profile support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects poor dispersion thought the Tulsa MSA AA. Poor performance regarding small business loans supports this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects poor dispersion throughout the Tulsa MSA AA. As seen in the following table, the bank's lending in moderate-income census tracts falls 13.0 percentage points below demographic data and reflects poor performance.

Geographic Distribution of Small Business Loans Tulsa MSA Assessment Area					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Low	0.0	0	0.0	0	0.0
Moderate	13.0	0	0.0	0	0.0
Middle	60.8	9	100.0	991	100.0
Upper	26.2	0	0.0	0	0.0
Totals	**100.0**	**9**	**100.0**	**991**	**100.0**
Source: D&B Data 2020, Bank Data 2020.					

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different sizes in the Tulsa MSA AA. A reasonable record regarding small business loans supports this conclusion.

Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses of different sizes in the Tulsa MSA AA. As seen in the following table, First Bank granted more than five out of every ten small business loans to businesses with gross annual revenue of $1 million or less, reflecting a reasonable level.

Distribution of Small Business Loans by Gross Annual Revenues Tulsa MSA Assessment Area					
Gross Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
< $100,000	63.7	1	11.1	25	2.5
$100,000 - $249,999	21.6	1	11.1	45	4.5
$250,000 - $499,999	4.4	2	22.3	503	50.8
$500,000 - $1,000,000	1.9	1	11.1	135	13.6
Subtotal <= $1,000,000	**91.6**	**5**	**55.6**	**708**	**71.4**
>$1,000,000	2.1	0	0.0	0	0.0
Revenue Not Available	6.3	4	44.4	283	28.6
Total	**100.0**	**9**	**100.0**	**991**	**100.0**
Source: D&B Data 2020, Bank Data 2020.					

Additionally, the analysis shows a notable percentage of small business loans without revenue information available, which skews the data. Examiners determined these loans were SBA PPP loans for which revenue information was not required to be collected. Examiners evaluated the four PPP loans without revenue information using loan size as a proxy. The data reveals that three loans reflected loans amounts under $100,000 and one loan reflected a loan amount under $250,000, further indicating that the bank serves the needs of the smallest businesses in the AA.

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
3) The geographic distribution of the bank's loans;
4) The institution's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the institution under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, 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 do 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; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.
Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

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 metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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.

Rated Area: A rated area is a state or multistate metropolitan 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

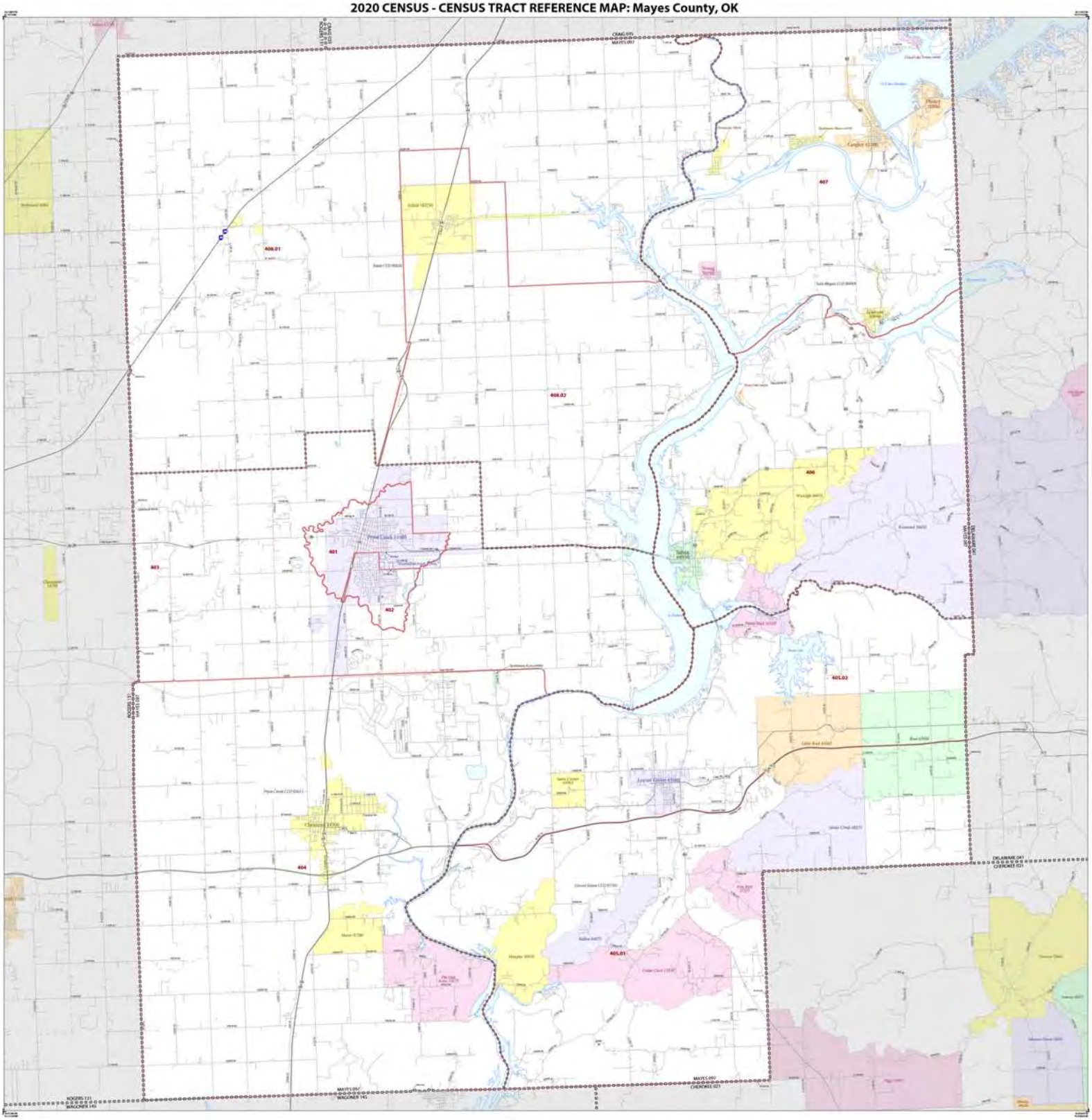
Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of $1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial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

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Upper-Income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.
Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Mayes County, OK



LEGEND

SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
International		CANADA
Federal American Indian Reservation		LANGE RESVN 1400
Off Reservation Trust Land		T1800
State Americanized Indian Reservation		Santa Rosa 6400
Alaska Native Regional Corporation		NANA ARRC 01120
State (or statistically equivalent entity)		NEW YORK 36
County (or statistically equivalent entity)		ERIE 029
Minor Civil Division (MCD)[1]		Boston town 07400
Consol County Division (CCD), Census Subarea (CSA), or Unorganized Territory (UT)		Marion CCD 07630
Consolidated City		MILFORD 07300

SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
Incorporated Place[1,2]		Derry 45300
Census Designated Place (CDP)[2]		Jackson Village 55700
Census Tract[3]		11.07

DESCRIPTION	SYMBOL
Water Body	Water color
College or University	Lehigh Univ
Military	FORT BENNING
Prison or Juvenile Detention Center	PEN
National or State Park, Forest, or Recreation Area	YOSEMITE NP
Outside Subject Area	

DESCRIPTION	SYMBOL
Interstate or U.S. Highway	I-95
State Highway or State Road	9
Other Road	
ABCD Trail, Scenic Alby, Walking, or Navy	
Recreation Remainder or Control Not Determined Specified	
Total Area	A1

Where international, state, county, and/or MCD/CCD boundaries coincide, the map shows the boundary symbol for only the highest ranking of these boundaries.

Geographic area names are followed by either their FIPS or census code.

1 A "*" following an MCD name denotes a false MCD. A "*" following a place name indicates that a false MCD exists with the same name and FIPS code as the place; the false MCD label is not shown.

2 Place label color corresponds to the place fill color.

3 Census tracts are identified by an up to four digit integer number and may have an optional two-digit suffix, for example 23 or 1427.02. The census tract codes consist of six digits with an implied decimal between the fourth and fifth digit corresponding to the basic census tract number, but with leading zeros, and trailing zeros for census tracts without a suffix. The tract number examples above would have codes of 002300 and 142702, respectively.

Due to space limitations, some road names, along with other feature and geographic names on the map, may not be shown.

0 1 2 3 4 Miles

0 1 2 3 4 5 6 7 8 9 10 Kilometers

The distance scale is in 2010.

All legal boundaries and names are as of January 1, 2020. The boundaries shown on this map are the Census Bureau statistical data collection and tabulation purposes only; their depiction and designation for statistical purposes does not constitute a determination of jurisdictional authority or rights of ownership or entitlement.

Geographic Vintage: 2020 Census reference date: January 1, 2020
Data source: U.S. Census Bureau's MAF/TIGER database (TIGER)
Map Created by Geography Division, January 06, 2021

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

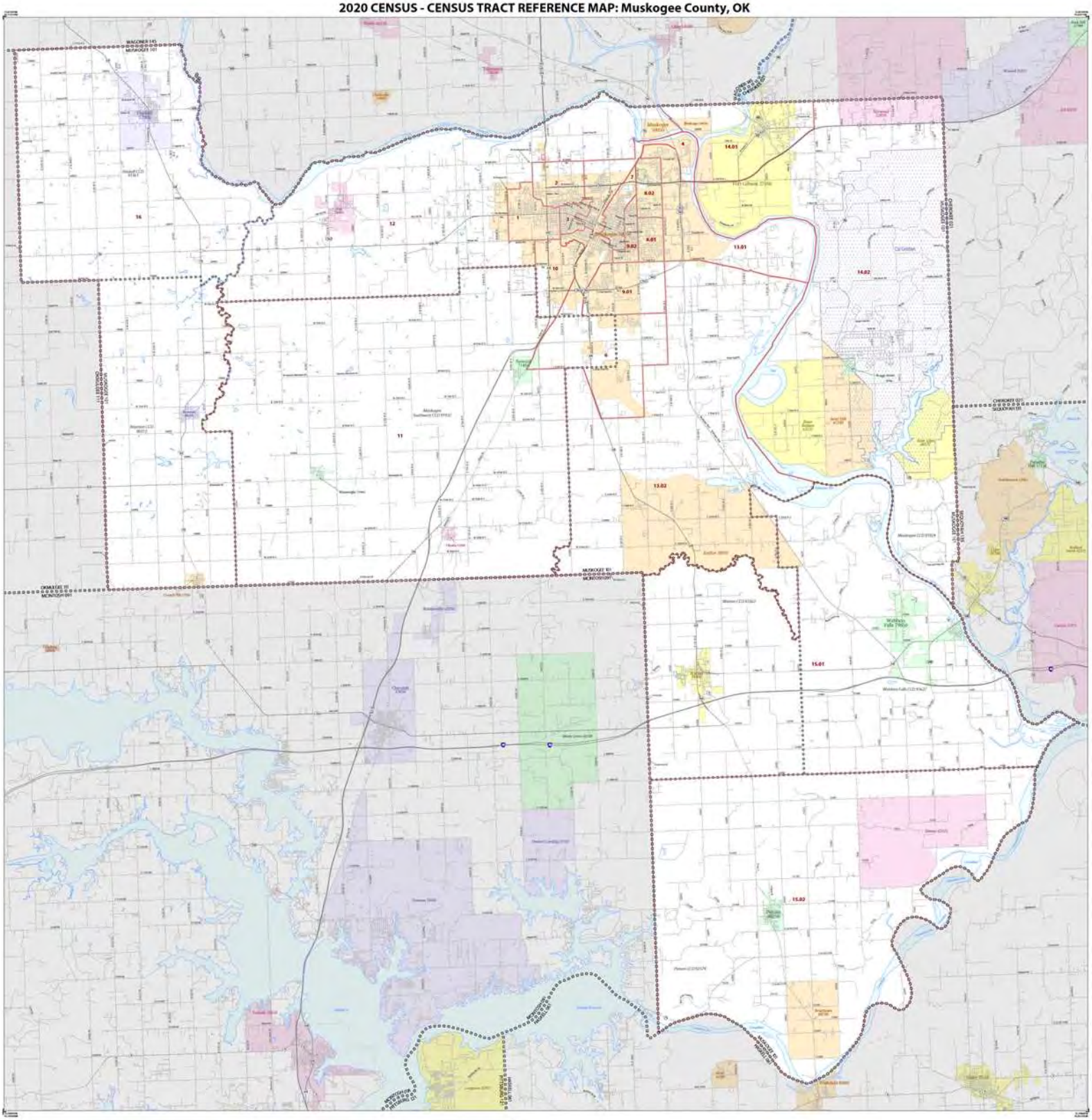
Projection: Albers Equal Area Conic
Datum: NAD 83
Spheroid: GRS 80
1st Standard Parallel: 29 30 00
2nd Standard Parallel: 45 30 00
Central Meridian: -96 00 00
Latitude of Projection's Origin: 23 00 00
False Easting: 0
False Northing: 0

Sheet 1 of 1 PARENT sheets
Total Sheets: 1 (Index 0; Parent 1; Inset 0)

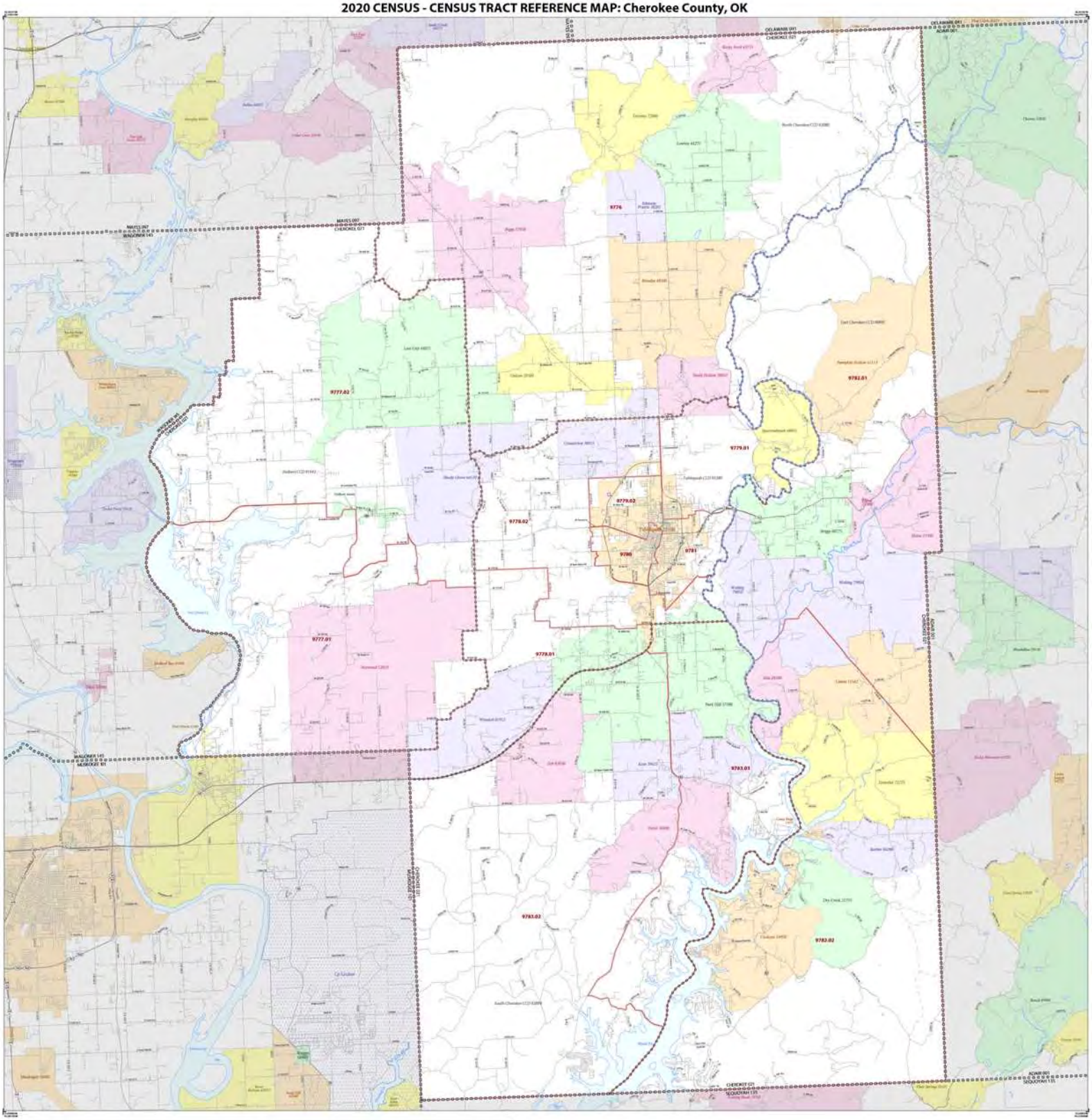
NAME: Mayes County (097)
ANSI CITY: County or statistically equivalent entity
ST: Oklahoma (40)

2020 CENSUS TRACT REF MAP (PARENT)
Sheet ID: (40,0,0,0

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Muskogee County, OK


14.01
8.02
4.01
9.02
9.01
13.01
14.02
13.02
15.01
15.02
16
12
11
10
7
4
WAGONER CO
MUSKOGEE CO
CHEROKEE CO
SEQUOYAH CO
HASKELL CO
MCINTOSH CO
OKMULGEE CO
MUSKOGEE CO
MCINTOSH CO
MUSKOGEE CO
MCINTOSH CO
MUSKOGEE CO
MCINTOSH CO
OKMULGEE CO
MCINTOSH CO
Muskogee (Urbanized Area)
Muskogee Southwest CCD [FIPS]
Muscogee Creek
Muskogee Creek
Muskogee CCD [FIPS]
Muskogee CCD [FIPS]
Muskogee CCD [FIPS]

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Cherokee County, OK



LEGEND

SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
International		CANADA
Federal American Indian Reservation		L'ANSE RESERV 1000
Off Reservation Trust Land		T1000
State AmericanAmerican Indian Reservation		Tunica Resort 9400
Alaska Native Regional Corporation		NANA ARRC 2112[1]
State (or statistically equivalent entity)		NEW YORK 36
County (or statistically equivalent entity)		ERIE 029
Minor Civil Division (MCD)[2]		Bristol town 07400
Census County Division (CCD), Census Subarea (CSA), or Unincorporated Territory (UT)		Alstom CCD 97430
Consolidated City		MILFORD 47300

SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
Incorporated Place[1,3]		Davis 19100
Census Designated Place (CDP)[3]		Jackson Village 37100
Census Tract[3]		11.07

DESCRIPTION	SYMBOL
Water Body	Water Color
College or University	Lake/Pond
Military	Civil Military
Prison or Juvenile Detention Center	Prison
National or State Park, Forest, or Recreation Area	Nationals/SP
Outside Subject Area	

DESCRIPTION	SYMBOL
Interstate or U.S. Highway	
State Highway or State Road	
Other Road	
ORV Trail, Railway, Alley, Walkway, or Ferry	
Recreation Remainder or Tribal Not Chouskoro Classified	
Tract Area	A1

Where international, state, county, and/or MCD/CCD boundaries coincide, the map shows the boundary symbol for only the highest ranking of these boundaries.

Geographic area names are followed by either their FIPS or census code.

1 A " " following an MCD name denotes a false MCD. A " " following a place name indicates that a false MCD exists with the same name and FIPS code as the place; the false MCD label is not shown.

2 Place label color corresponds to the place fill color.

3 Census tracts are identified by an up to four digit integer number and may have an optional two-digit suffix, for example 23 or 1427.02. The census tract codes consist of six digits with an implied decimal between the fourth and fifth digit corresponding to the basic census tract number, but with leading zeros, and trailing zeros for census tracts without a suffix. The tract number examples above would have codes of 002300 and 142702, respectively.

Due to space limitations, some road names, along with other feature and geographic names on the map, may not be shown.

All legal boundaries and names are as of January 1, 2020. The boundaries shown on this map are the Census Bureau statistical data collection and tabulation purposes only; their depiction and designation for statistical purposes does not constitute a determination of jurisdictional authority or rights of ownership or control.

Geographic Vintage: 2020 Census reference date: January 1, 2020
Data source: U.S. Census Bureau's MAF/TIGER database (TIGER)
Map Created by Geographic Division, January 06, 2021

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

Projection: Albers Equal Area Conic
Datum: NAD 83
Spheroid: GRS 80
1st Standard Parallel: 29 30 00
2nd Standard Parallel: 45 30 00
Central Meridian: -96 00 00
Latitude of Projection's Origin: 23 00 00
False Easting: 0
False Northing: 0

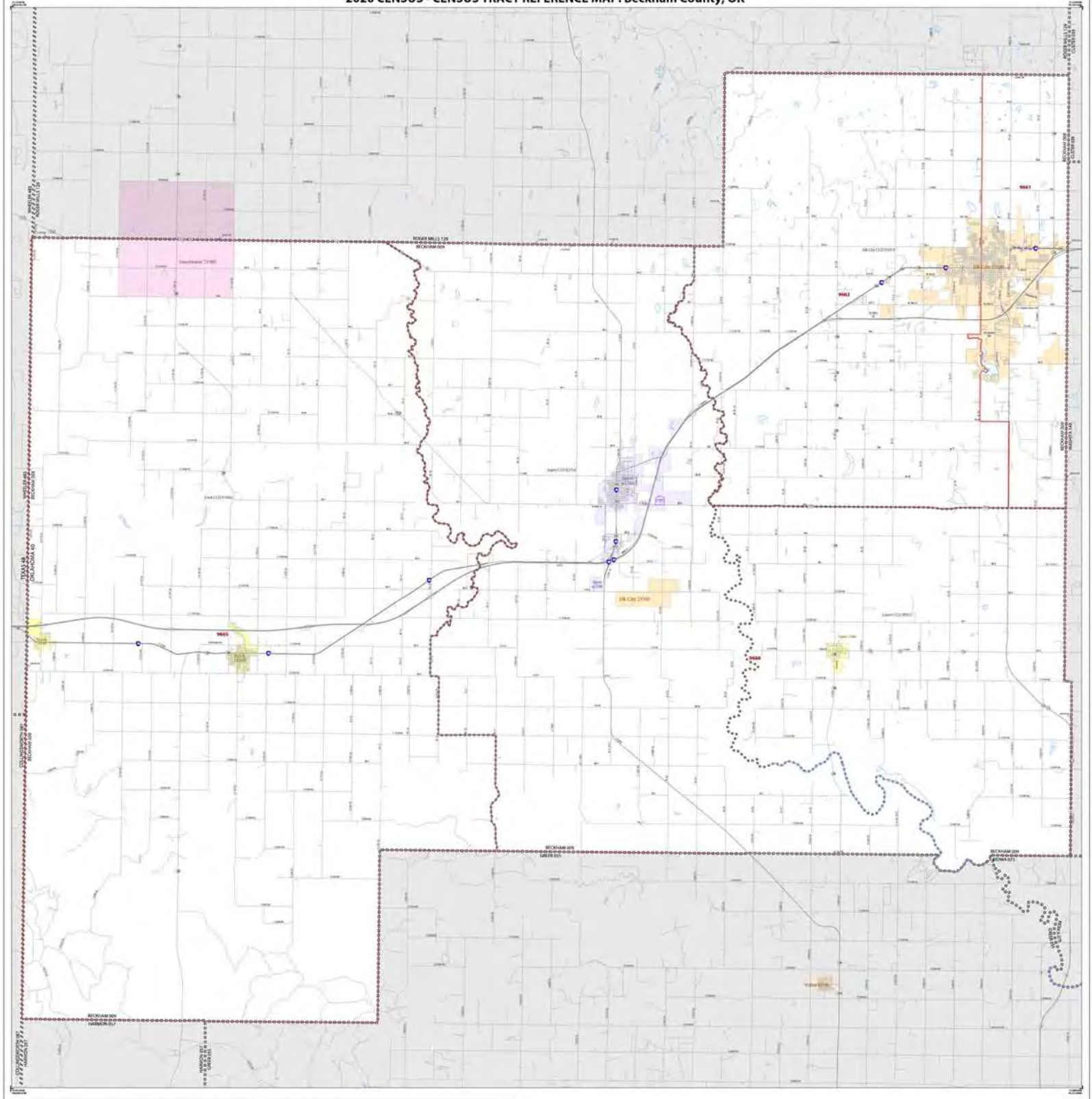
Sheet 1 of 1 PARENT sheets
Total Sheets: 1 (Index 0; Parent 1; Inset 0)

NAME: Cherokee County (021)
ENTITY TYPE: County or statistically equivalent entity
ST: Oklahoma (40)

2020 CENSUS TRACT REF MAP (PARENT)
Sheet ID: (0040021021)

Census 2020

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Beckham County, OK



LEGEND

SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
International		CANADA
Federal American Indian Reservation		LANGE RESVN 1400
OK Reservation Trust Land		T1800
State Statistical Indian Reservation		Tanka Resort 8400
Alaska Native Regional Corporation		NANA ANRC 01120
State (or statistically equivalent entity)		NEW YORK 36
County (or statistically equivalent entity)		ERIE 029
Minor Civil Division (MCD)[1]		Boston town 07400
Census County Division (CCD), Census Subarea (CSA), or Unalaskan Tract (UT)		Akron CCD 97430
Consolidated City		MILFORD 47300

SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
Incorporated Place[1,2]		Elm Cy 18300
Census Designated Place (CDP)[2]		Golden Village 17100
Census Tract[3]		11.07

DESCRIPTION	SYMBOL
Water Body	Water body
College or University	College
Military	Military
Prison or Juvenile Detention Center	Prison
National or State Park, Forest, or Recreation Area	National SP
Outside Subject Area	

DESCRIPTION	SYMBOL
Interstate, U.S. Highway, State Highway or State Road	
Other Road	
AMTRAK Track, Railway, Alley, Walkway, or Ferry	
Recreation Remainder or Tribal Not Obtained/Classified	
Total Area	A1

When international, state, county, and/or MCD/CCD boundaries coincide, the map shows the boundary symbol for only the highest ranking of these boundaries.

Geographic area names are followed by either their FIPS or census code.

1 A " " following an MCD name denotes a false MCD. A " " following a place name indicates that a false MCD exists with the same name and FIPS code as the place; the false MCD label is not shown.

2 Place label color corresponds to the place fill color.

3 Census tracts are identified by an up to four digit integer number and may have an optional two-digit suffix for example 23 or 1417.02. The census tract codes consist of six digits with an implied decimal between the fourth and fifth digit corresponding to the basic census tract number, but with leading zeros, and trailing zeros for census tracts without a suffix. The tract number examples above would have codes of 002300 and 141702, respectively.

Due to space limitations, some road names, along with other feature and geographic names on the map, may not be shown.

All legal boundaries and names are as of January 1, 2020. The boundaries shown on this map are the Census Bureau statistical data collection and tabulation purposes only; their depiction and designation for statistical purposes does not constitute a determination of jurisdictional authority or rights of ownership or entitlement.

Geographic Vintage: 2020 Census reference date: January 1, 2020
Data source: U.S. Census Bureau's MAF/TIGER database (TIGER)
Map Created by Geography Division, January 06, 2021

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

Projection: Albers Equal Area Conic
Datum: NAD 83
Spheroid: GRS 80
1st Standard Parallel: 29 30 00
2nd Standard Parallel: 45 30 00
Central Meridian: -96 00 00
Latitude of Projection Origin: 23 00 00
False Easting: 0
False Northing: 0

Sheet 1 of 1 PARENT sheets
Total Sheets: 1 (Index 0; Parent 1; Inset 0)

NAME: Beckham County (009)
GEOT TYP: County or statistically equivalent entity
ST: Oklahoma (40)

2020 CENSUS TRACT REF MAP (PARENT)
Sheet ID: 2020CRMP0001

Census 2020