

FIRST OKLAHOMA BANK

PUBLIC FILE: COMMUNITY REINVESTMENT ACT

In compliance with the Community Reinvestment Act, First Oklahoma Bank provides this complete public file available to you. All data within the file is updated as of April 1st of each year, with the exception of items outlined in section 345.43 of the regulation.

- **Public Comments**

The Community Reinvestment Act requires that we keep record of written comments received from the public that specifically relate to our performance in helping to meet the community credit needs, and any response to comments by the bank.

- 2022- No comments were received
- 2023- No comments were received
- 2024- No comments were received

- **Our most recent CRA Evaluation:**

First Oklahoma Bank was examined by federal regulators in 2024 and received a CRA rating of satisfactory. The public disclosure of this exam is enclosed.

- **Our locations and hours of operation:**

- **Jenks HQ- MSA: 46140, State: 40, County: 143, Tract: 0067.03**

This tract is designated as moderate-income

100 S Riverfront Drive; Suite 100, Jenks, OK 74037

Lobby: Monday-Friday 9:00 AM - 5:00 PM

Drive-thru: Monday-Friday: 8:00 AM - 6:00 PM, Saturday 8:00 AM - 12:00 PM

- **Midtown- MSA: 46140, State: 40, County: 143, Tract: 0050.02**

This tract is designated as middle-income

4110 S Rockford Ave, Tulsa, OK 74105

Lobby: Monday-Friday: 9:00 AM - 5:00 PM

Drive-thru: Monday-Friday 8:00 AM - 6:00 PM

- **Glencoe- MSA: N/A, State: 40, County: 119, Tract: 0111.01**

This tract is designated as upper-income

311 W Main St, Glencoe, OK 74032

Monday-Thursday: 9:00 AM - 3:00 PM

Friday: 9:00 AM - 4:30 PM

- **Branches that we have opened or closed in the past two year:**
 - We have not opened or closed any branches in the past two years.

- **Services available at our branches:**
 - Checking Accounts
 - Basic Checking
 - Checking w/ Interest
 - Simple Checking
 - Basic Business Checking
 - Community Business Checking
 - Commercial Checking
 - IOLTA Accounts
 - Savings Accounts
 - Basic Savings
 - Youth Savings
 - Health Savings Accounts (HSAs)
 - Money Market
 - Commercial Money Market
 - Certificates of Deposit
 - IRA Services
 - Safety Deposit Boxes
 - Consumer Loans
 - Personal Loans and Personal Lines of Credit
 - Home Equity Loans - Origination fees are .75% of the loan amount.
 - HELOCs – Origination fees are .25% of the line amount.
 - First and Second lien purchase loans - Origination fees are .75% of the loan amount.
 - First and Second lien refinances - Origination fees are .75% of the loan amount.
 - Construction loans - Origination fees are 1.00% of the loan amount.
 - Bridge loans- Origination fees are 1.00% of the loan amount.
 - Lot loans - Origination fees are .75 - 1.00% of the loan amount.
 - Purchase/Rehab loans - Origination fees are 1.00% of the loan amount.
 - Commercial loans
 - Small Business Administration (SBA) Loans
 - Night Depository
 - Wire Transfers
 - Official Checks and Money Orders
 - Medical Banking
 - Credit Cards for personal or business

A schedule of deposit account transactional fees is enclosed.

- **Information about our Home Mortgage Lending:** First Oklahoma Bank is required to submit data about its home mortgage lending to regulators annually. Our Home Mortgage Disclosure Act Statement is available online at www.consumerfinance.gov/hmda.
- **Information about our loans and deposits:** First Oklahoma Bank is required to provide you with our loan to deposit ratio for each quarter of the prior calendar year. This information can be found below:
 - 1st Quarter 2024
 - Loans (\$922,315,000)/Deposits (\$943,145,000) = 97.79%
 - 2nd Quarter 2024
 - Loans (\$922,318,000)/Deposits (\$968,523,000) = 95.23%
 - 3rd Quarter 2024
 - Loans (\$945,556,000)/Deposits (\$970,213,000) = 97.46%
 - 4th Quarter 2024
 - Loans (\$980,611,000)/Deposits (\$988,972,000) = 99.15%

PUBLIC DISCLOSURE

July 22, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Oklahoma Bank
Certificate Number: 12484

100 S Riverfront Drive
Jenks, Oklahoma 74037

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.

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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 (AA), including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit (LTD) ratio is more than 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 and individuals of different income levels (including low- and moderate-income).
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

The institution's community development (CD) performance demonstrates adequate responsiveness to CD needs in its AAs through CD loans, qualified investments (QIs) and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for CD in the institution's AAs.

DESCRIPTION OF INSTITUTION

First Oklahoma Bank (FOB), headquartered in Jenks, Oklahoma, remains wholly owned by First Oklahoma Holdings, Inc., a one-bank holding company also located in Jenks. The bank's wholly-owned mortgage subsidiary, First Oklahoma Mortgage, LLC, located at the main office in Jenks, ceased operations as of third quarter 2023. FOB continues to function as a retail bank operating three full-service offices in northeastern Oklahoma. The bank did not open or close any branches or participate in any merger or acquisition activities since the previous evaluation. FOB received a Satisfactory rating at its previous FDIC performance evaluation dated July 19, 2021, based on Intermediate Small Bank Procedures.

FOB offers various loan products including commercial, home mortgage, agricultural, and consumer loans, primarily focusing on commercial and home mortgage lending. Deposit products and services offered include checking, savings, money market, and certificate of deposit accounts as well as debit cards. Alternative delivery systems include ATMs, online banking, and mobile banking.

According to Reports of Condition and Income data as of March 31, 2024, FOB reported total assets of approximately \$1.1 billion, total loans of \$922.3 million, and total deposits of \$943.1 million. Since the prior evaluation, total assets increased by 16.0 percent, total loans increased by 16.7 percent, and total deposits increased by 15.2 percent. The following table illustrates the bank's outstanding loan portfolio as of March 31, 2024, reflecting a distribution supportive of the institution's primary business focus, with commercial and home mortgage loans representing the largest portions of the loan portfolio.

Loan Portfolio Distribution as of 3/31/2024		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	91,390	9.9
Secured by Farmland	8,449	1.0
Secured by 1-4 Family Residential Properties	167,186	18.1
Secured by Multifamily (5 or more) Residential Properties	25,281	2.7
Secured by Nonfarm Nonresidential Properties	429,914	46.6
Total Real Estate Loans	722,220	78.3
Commercial and Industrial Loans	155,651	16.9
Agricultural Production and Other Loans to Farmers	350	0.0
Consumer Loans	5,322	0.6
Obligations of State and Political Subdivisions in the U.S.	113	0.0
Other Loans	38,658	4.2
Total Loans	922,314	100.0
<i>Source: Reports of Condition and Income. Due to rounding, totals may not equal 100.0.</i>		

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

The CRA requires each financial institution to define one or more AAs for which examiners will evaluate its CRA performance. FOB designated two AAs within the State of Oklahoma as seen in the following table. The AAs meet the technical requirements of the CRA. Refer to the individual AA sections of this evaluation for additional information for each AA.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	#ofCTs	# of Branches
Tulsa MSA AA	Tulsa, Creek*, and Wagoner*	229	2
Oklahoma Non-MSA AA	Payne	23	1
<i>Source: Bank Data; 2020 U.S. Census Data. *Denotes partial county.</i>			

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated July 19, 2021, to the current evaluation dated July 22, 2024. Examiners evaluated performance based on Intermediate Small Bank Procedures, which include the Lending Test and Community Development Test. The appendix lists the tests' criteria.

Examiners applied full-scope procedures to the Tulsa MSA AA as this area maintains a significant majority of lending, deposits, and branches as seen in the following table. The Oklahoma Non-Metropolitan Statistical Area (MSA) AA accounts for a minimal portion of the institution's total activities. Since this AA received full-scope review at the prior evaluation, examiners applied limited-scope procedures to this AA at the current evaluation. Performance in the Tulsa MSA AA contributed significantly more weight than the Oklahoma Non-MSA AA when drawing conclusions. The following table shows the breakdown of the activities in each AA.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Tulsa MSA AA	100,463	99.8	911,396	96.3	2	66.7
Oklahoma Non-MSA AA	198	0.2	35,110	3.7	1	33.3
Total	100,661	100.0	946,506	100.0	3	100.0
<i>Source: 2023 Bank Data; FDIC Summary of Deposits (6/30/2023). Due to rounding, totals may not equal 100.0.</i>						

Activities Reviewed

Intermediate Small Bank Procedures require examiners to determine the bank's major product lines for review. Examiners may select from the same loan categories used for Large Bank evaluations: home mortgage, small business, small farm, and consumer loans. The following table shows the bank's lending activity for 2023.

Loans Originated or Purchased				
Loan Category	\$(000s)	%	#	%
Construction and Land Development	48,395	14.0	31	6.6
Secured by Farmland	3,820	1.1	4	0.9
Secured by 1-4 Family Residential Properties	34,788	10.1	161	34.3
Multi-Family (5 or more) Residential Properties	8,893	2.6	5	1.0
Commercial Real Estate Loans	128,462	37.3	96	20.5
Commercial and Industrial Loans	105,482	30.6	131	27.9
Agricultural Loans	915	0.3	4	0.9
Consumer Loans	1,871	0.5	22	4.7
Other Loans	11,875	3.5	15	3.2
Total Loans	344,501	100.0	469	100.0
<i>Source: 2023 Bank Data. Due to rounding, totals may not equal 100.0.</i>				

Considering the dollar volume and number of loans originated or purchased, as well as management's stated business strategy, examiners determined the bank's major product lines consist of commercial and home mortgage lending. No other loan types represent major product lines and thus would not materially affect any conclusions or ratings; therefore, this evaluation does not include a review of consumer or small farm loans. Bank records indicate the lending focus and product mix remained generally consistent throughout the evaluation period.

For the Lending Test, this evaluation includes a review of the universe of 181 small business loans totaling \$59.2 million originated or purchased in 2023, which represents the most recent completed calendar year of available data. Since readily available gross annual revenue data did not exist for the universe of loans, examiners selected a sample of 55 small business loans totaling approximately \$9.8 million originated inside the Tulsa MSA AA to evaluate the borrower profile criterion. Due to the limited volume of lending in the Oklahoma Non-MSA AA, examiners reviewed the entire universe of 2 small business loans totaling \$400,000 originated in this AA to evaluate borrower profile performance. D&B data for 2023 provided a standard of comparison for small business loans.

FOB reports home mortgage loans pursuant to the Home Mortgage Disclosure Act (HMDA). Therefore, for the Lending Test, this evaluation includes a review of the home mortgage loans reported on the bank's HMDA Loan Application Registers (LAR) since the prior evaluation, as follows:

- 2021: 173 home mortgage loans totaling \$36.3 million,
- 2022: 149 home mortgage loans totaling \$54.7 million, and
- 2023: 70 home mortgage loans totaling \$32.9 million.

Although lending volume declined during the review period, examiners did not identify any significant trends between the different years' data that materially affect applicable conclusions or ratings. Therefore, the geographic distribution and borrower profile analyses present home mortgage loan data for 2022, the most recent year for which aggregate data exists. However, the Assessment Area Concentration presents home mortgage loan data for all years reviewed.

Examiners primarily compared the bank's home mortgage lending to aggregate data in 2021 and 2022 and 2020 U.S. Census data in 2023.

FOB did not originate any home mortgage loans in the Oklahoma Non-MSA AA in 2023; therefore, examiners did not review this product for this AA. Examiners further confirmed that no other loan products typically reviewed for CRA represent a major product line in the Oklahoma Non-MSA AA.

Examiners considered the universes by dollar volume and number of loans originated as well as management's stated business strategy to determine the loan product weighting when arriving at overall conclusions. Small business loans represent a majority by both number and dollar volume of the loan categories reviewed. Therefore, small business loans received more weight when drawing conclusions.

Loan Products Reviewed				
Loan Category	Universe			
	#	%	\$(000s)	%
Home Mortgage	70	27.9	32,991	35.8
Small Business	181	72.1	59,185	64.2
Total Loans	251	100.0	92,176	100.0
<i>Source: 2023 HMDA Data; 2023 Bank Data. Due to rounding, totals may not equal 100.0.</i>				

While the evaluation presents both the number and dollar volume of loans, examiners emphasized performance by number of loans when arriving at conclusion for the individual performance factors because the number of loans better indicates the number of businesses and individuals served.

For the Community Development Test, the scope of the evaluation includes data provided by management on CD loans, QIs, and CD services since the prior evaluation. The evaluation of QIs also considers the book value of prior period QIs that remain outstanding as of this evaluation's date.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

FOB demonstrated satisfactory performance regarding the Lending Test. A majority of loans originated inside the AAs, reasonable records regarding geographic distribution and borrower profile, and a more than reasonable LTD ratio support this conclusion.

Loan-to-Deposit Ratio

The LTD ratio is more than 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, calculated from Call Report data, averaged 92.7 percent over the past 11 quarters from September 30, 2021, to March 31, 2024, which decreased slightly from 95.5 percent average

net LTD ratio reported at the previous evaluation. The ratio ranged from a low of 88.4 percent on December 31, 2022, to a high of 96.8 percent as of March 31, 2024.

Examiners identified two comparable institutions operating in similar areas with similar asset sizes and lending emphasis. The following table shows FOB reported the highest average net LTD ratio among the comparable institutions.

LTD Ratio Comparison		
Bank	Total Assets as of 3/31/2024 (\$000s)	Average Net LTD Ratio (%)
First Oklahoma Bank, Jenks, OK	1,072,236	92.7
Security Bank, Tulsa, OK	840,443	89.0
Spirit Bank, Tulsa, OK	776,804	86.4
<i>Source: Reports of Condition and Income 9/30/2021 - 3/31/2024.</i>		

Assessment Area Concentration

A majority of loans are inside the institution's AAs. The following table shows, FOB originated a majority of small business loans, by number, and a majority of home mortgage loans, by number and dollar, within the AAs. Although FOB originated a majority of small business loans by dollar volume outside the AAs, this did not adversely affect the conclusion for this criterion.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	101	55.8	80	44.2	181	21,750	36.7	37,435	63.3	59,185
Home Mortgage										
2021	139	80.3	34	19.7	173	27,151	74.7	9,186	25.3	36,337
2022	121	81.2	28	18.8	149	42,722	78.0	12,019	22.0	54,741
2023	47	67.1	23	32.9	70	23,753	72.0	9,238	28.0	32,991
Subtotal	307	76.2	85	23.8	392	93,626	74.9	30,443	25.1	124,069
Source: 2023 Bank Data and HMDA Data.										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AAs. Reasonable performance in the Tulsa MSA AA supports this conclusion. Performance in the Oklahoma Non-MSA AA proved inconsistent, but it did not affect the overall conclusion. Examiners considered the loan product types reviewed relative to the available comparative data and any performance context issues when arriving at conclusions. Examiners focused on the number of small business and home mortgage loans in low- and moderate-income census tracts when arriving at conclusions. Refer to the individual AA sections for details.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AAs, reasonable penetration among businesses of different sizes and individuals of different income levels (including low- and moderate-income). Reasonable performance in the Tulsa MSA AA supports this conclusion. Performance in the Oklahoma Non-MSA AA proved inconsistent, but it did not affect the overall conclusion. Examiners focused on the percentage by number of loans to businesses with gross annual revenue of \$1 million or less and to low- and moderate-income individuals within the AAs when arriving at conclusions. Refer to the individual AA sections for details.

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

FOB demonstrated satisfactory performance regarding the Community Development Test. The institution's CD performance demonstrates adequate responsiveness to CD needs in its AAs through CD loans, QIs, and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for CD in the institution's AAs.

Community Development Loans

The following table shows that since the prior evaluation, FOB originated 15 CD loans totaling \$26.7 million. The total dollar amount equates to 2.6 percent of average total assets of \$1.0 billion since the prior evaluation and 3.2 percent of average net loans of \$832.9 million for the same time period. This continues to reflect a good level, although decreasing from the 5.7 percent of average total assets and 6.8 percent of average net loans reported at the previous evaluation.

The CD loans proved appropriately responsive to the AAs' needs given that activities addressed all categories of CD. The following tables illustrate the CD loans by purpose, year, and AA.

Community Development Lending by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021	0	0	0	0	1	8,892	0	0	1	8,892
2022	1	3,425	2	2,170	3	3,214	5	5,423	11	14,232
2023	0	0	0	0	0	0	2	732	2	732
YTD2024	0	0	0	0	0	0	1	2,870	1	2,870
Total	1	3,425	2	2,170	4	12,106	8	9,025	15	26,726
Source: Bank Data.										

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing:		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Tulsa MSA	0	0	2	2,170	4	12,106	8	9,025	14	23,301
Oklahoma Non-MSA	1	3,425	0	0	0	0	0	0	1	3,425
Total	1	3,425	2	2,170	4	12,106	8	9,025	15	26,726
<i>Source: Bank Data.</i>										

Qualified Investments

FOB made use of 17 QIs totaling \$5.8 million during the evaluation period. This total dollar amount equates to 0.6 percent of average total assets since the previous evaluation and 25.6 percent of average total securities of \$22.7 million for the same period. This adequate level reflects a slight increase from the 0.3 percent of average total assets and a decrease from the 154.1 percent of average total securities reported at the previous evaluation.

As reflected in the following table, the QIs proved adequately responsive by primarily addressing an identified need of community services. The following table presents the QIs by purpose and AA.

Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing:		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Tulsa MSA	0	0	14	5,316	0	0	0	0	14	5,316
Oklahoma Non-MSA	0	0	2	8	0	0	0	0	2	8
Statewide Activities	1	500	0	0	0	0	0	0	1	500
Total	1	500	16	5,324	0	0	0	0	17	5,824
<i>Source: Bank Data.</i>										

The following lists an example of a statewide QI.

- ***Affordable Housing*** - The bank invested \$500,000 in a mortgage pool that provides affordable housing for low- and moderate-income individuals in the greater statewide area.

Community Development Services

The following table shows that since the prior evaluation, FOB provided 79 CD services. This high level reflects a significant increase over the 33 CD services at the previous evaluation. The services involve bank personnel's use of their technical expertise to benefit organizations or projects with a primary purpose of CD, as defined by CRA regulations. The CD services primarily benefited community service organizations that provide services to low- and moderate-income individuals, which demonstrates the bank's responsiveness to a significant identified CD need in the AAs. The following tables detail the CD services by year, purpose, and AA.

Community Development Services by Year					
Activity Year	Affordable Housing:	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2021	0	6	0	0	6
2022	0	14	0	0	14
2023	0	38	5	0	43
YTD2024	0	16	0	0	16
Total	0	74	5	0	79
<i>Source: Bank Data.</i>					

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Tulsa MSA	0	69	5	0	74
Oklahoma Non-MSA	0	2	0	0	2
Nationwide Activities	0	3	0	0	3
Total	0	74	5	0	79
<i>Source: Bank Data.</i>					

The following lists an example of a CD service in the nationwide area.

- **Community Services** - A bank employee helps translate financial information by explaining the United States banking system, account opening process, and how to budget to refugees, asylum seekers, and immigrants. The individuals who receive assistance through this nationwide entity are primarily considered low- or moderate-income as they came to the United States with little to no financial backing and are in the process of seeking asylum status and citizenship.

Regarding the availability of services, FOB operates one branch in a moderate-income census tract, which further helps avail the bank's services to low- and moderate-income individuals and geographies.

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 the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

TULSA MSA AA - Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TULSA MSA AA

The Tulsa MSA AA consist of all Tulsa County, 11 of 23 census tracts in east central Creek County, 10 of 25 census tracts in northwestern Wagoner County. These counties represent three of the seven counties comprising the entire Tulsa MSA. FOB continues to operate two full-service branches, including the main office, and two ATMs in this AA. Delivery systems and range of products and services remain consistent with those reflected in the overall Description of Institution section of this performance evaluation.

Economic and Demographic Data

The Tulsa MSA AA encompasses 229 census tracts reflecting the following income designations according to the 2020 U.S. Census Data: 13 low-, 70 moderate-, 65 middle-, and 80 upper-income census tracts, as well as 1 census tract with no income designation. The following table shows select demographic and economic characteristics of the area.

Demographic Information of the Assessment Area Tulsa MSA AA						
Demographic Characteristics	#	Low %of#	Moderate %of#	Middle %of#	Upper %of#	NA* %of#
Geographies (Census Tracts)	229	5.7	30.6	28.4	34.9	0.4
Population by Geography	732,822	5.6	29.4	29.0	35.6	0.4
Housing Units by Geography	309,269	6.3	30.2	30.2	32.8	0.4
Owner-Occupied Units by Geography	168,362	3.2	22.0	31.4	43.2	0.1
Occupied Rental Units by Geography	108,285	10.4	39.8	28.9	20.1	0.7
Vacant Units by Geography	32,622	8.7	40.6	28.2	21.7	0.9
Businesses by Geography	109,455	3.9	24.0	30.4	41.6	0.1
Farms by Geography	2,857	3.2	20.7	38.1	37.9	0.1
Family Distribution by Income Level	175,357	21.3	17.3	19.1	42.3	0.0
Household Distribution by Income Level	276,647	23.7	16.4	17.5	42.4	0.0
Median Family Income - Tulsa, OK MSA	\$72,203		Median Housing Value			\$163,184
			Median Gross Rent			\$899
			Families Below Poverty Level			10.7%
Source: 2020 U.S. Census Data and 2023 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.						

Examiners used the applicable FFIEC-estimated median family income (MFI) to analyze home mortgage loans for the borrower profile criterion. The following table shows applicable income ranges based on the estimated MFI of \$81,300 for the Tulsa MSA in 2022.

Median Family Income Ranges - Tulsa MSA				
Median Family Incomes	Low <50%	Moderate 50%to<80%	Middle 80% to <120%	Upper >120%
2022 (\$81,300)	<\$40,650	\$40,650 to <\$65,040	\$65,040 to <\$97,560	>\$97,560
Source: FFIEC.				

According to Moody's Analytics, the MSA's largest employers include: Saint Francis Health System, Walmart, Sam's Club, Tulsa Public Schools, and the City of Tulsa. The following table presents the unemployment rates for the AA counties, State of Oklahoma, and nationwide. The rates reflect a slight increase within the AA for year-to-date 2024.

Unemployment Rates Tulsa MSA AA				
Area	2021	2022	2023	YTD2024
	%	%	%	%
Creek County	4.4	3.5	3.5	3.8
Tulsa County	4.2	3.1	3.2	3.5
Wagoner County	3.7	3.0	3.2	3.5
State of Oklahoma	4.0	3.1	3.2	3.5
National Average	5.4	3.6	3.6	3.9
Source: Bureau of Labor Statistics.				

Competition

The area reflects a low competition level, considering its population. According to the June 30, 2023, FDIC Deposit Market Share Report, the counties comprising the Tulsa MSA AA contain 53 financial institutions that operate 228 offices. FOB ranks 8th with nearly 3.0 percent deposit market share. However, mortgage companies, credit unions, and finance companies also compete for loans in the area adding to the competition level.

Community Contact

As part of the evaluation process examiners obtain information from third parties knowledgeable of the AA to assist in identifying needs of the area. This information helps determine financial institutions' responsiveness to these needs and shows available credit and CD opportunities.

Examiners utilized a recent community contact with an economic development organization serving the AA. The contact indicated the local economy continues to improve and grow due to an increasing population. The contact stated housing and adding new businesses to the area represent the primary needs of the area. In addition, the contact stated that local banks remain involved in the community and appropriately serve the credit needs.

Credit and Community Development Needs and Opportunities

Considering information from bank management, the community contact, as well as demographic and economic data, examiners determined that home mortgage and commercial lending, including small business loans, represent the primary credit needs in the AA.

Regarding the area's CD needs, demographic data shows that 36.3 percent of the AA's census tracts received low- or moderate-income designations, suggesting a need for activities that revitalize and stabilize qualifying geographies. Additionally, 38.6 percent of families considered low or moderate income evidences a need for affordable housing and community services.

CONCLUSIONS ON PERFORMANCE CRITERIA IN TULSA MSA AA

LENDING TEST

FOB demonstrated a satisfactory record in the Tulsa 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 Tulsa MSA AA. Reasonable small business lending performance outweighs excellent home mortgage lending performance to support this conclusion.

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the Tulsa MSA AA. The following table shows FOB's level of lending in low-income census tracts exceeds demographic data by 5.2 percentage points, reflecting reasonable performance. In moderate-income census tracts, the bank's lending only slightly trails demographic data, also reflecting reasonable performance.

Geographic Distribution of Small Business Loans Tulsa MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	3.9	9	9.1	4,150	19.4
Moderate	24.0	23	23.2	5,145	24.1
Middle	30.1	22	22.2	5,098	23.9
Upper	41.8	45	45.5	6,957	32.6
Not Available	0.2	0	0.0	0	0.0
Totals	100.0	99	100.0	21,350	100.0
<i>Source: 2023 D&B Data; 2023 Bank Data. Due to rounding, totals may not equal 100.0.</i>					

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the Tulsa MSA AA. Excellent performance in moderate-income census tracts outweighs reasonable performance in low-income census tracts to support this conclusion.

The following table shows FOB's lending in low-income census tracts rises above aggregate data by 3.3 percentage points, reflecting reasonable performance. In moderate-income census tracts, the bank's lending level significantly exceeds aggregate data by 21.6 percentage points, reflective of excellent performance. Given the larger volume of owner-occupied housing units in moderate-income census tracts evidencing a likely greater opportunity to lend, examiners placed more weight to this income geography when arriving at an overall conclusion.

Geographic Distribution of Home Mortgage Loans Tulsa MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	3.2	1.7	6	5.0	1,199	3.1
Moderate	22.0	17.6	47	39.2	14,232	36.2
Middle	31.4	31.0	43	35.8	16,347	41.6
Upper	43.2	49.7	24	20.0	7,519	19.1
Not Available	0.1	0.0	0	0.0	0	0.0
Totals	100.0	100	120	100.0	39,297	100.0
<i>Source: 2020 U.S. Census Data; 2022 HMDA Data; 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0.</i>						

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among businesses of different sizes and individuals of different income levels (including low- and moderate-income). A reasonable record regarding small business lending primarily supports this conclusion.

Small Business Loans

The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among businesses of different sizes. A reasonable record to businesses with gross annual revenue of \$1 million or less supports this conclusion. The following table shows FOB originated more than seven out of every ten small business loans to businesses with gross annual revenue of \$1 million or less, reflecting reasonable performance.

Distribution of Small Business Loans by Gross Annual Revenues Tulsa MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	69.6	15	27.3	3,325	34.0
\$100,000 - \$249,999	16.0	10	18.2	1,961	20.0
\$250,000 - \$499,999	3.7	10	18.2	1,095	11.2
\$500,000 - \$1,000,000	1.9	8	14.5	1,520	15.5
Subtotal<= \$1,000,000	91.2	43	78.2	7,901	80.7
>\$1,000,000	2.9	9	16.4	1,672	17.1
Revenue Not Available	6.0	3	5.4	220	2.3
Total	100.0	55	100.0	9,793	100
<i>Source: 2023 D&B Data; 2023 Bank Data. Due to rounding, totals may not equal 100.0.</i>					

Home Mortgage Loans

The distribution of borrowers reflects, given the demographics of the AA, poor penetration among individuals of different income levels (including low- and moderate-income). Poor performance to moderate-income borrowers outweighs reasonable performance to low-income borrowers to support this conclusion.

The following table shows FOB's lending to low-income borrowers trails aggregate data by 5.9 percentage points, which remains within a reasonable range. The table further shows FOB's lending to moderate-income borrowers notably trails aggregate data by 14.6 percentage points, thereby reflecting poor penetration. However, given that more than a majority of loans were to borrowers within income not available, this heavily skews the data and makes conclusions less meaningful. Therefore, examiners placed little weight on home mortgage lending when arriving at an overall conclusion for the borrower profile criterion.

Distribution of Home Mortgage Loans by Borrower Income Level Tulsa MSA AA						
Borrower Income Level	% of Families	Aggregate Performance %of#	#	%	\$(000s)	%
Low	21.3	6.7	1	0.8	179	0.5
Moderate	17.3	17.1	3	2.5	429	1.1
Middle	19.1	18.8	7	5.8	878	2.2
Upper	42.3	33.8	14	11.7	2,698	6.9
Not Available	0.0	23.6	95	79.2	35,113	89.3
Totals	100.0	100.0	120	100.0	39,297	100.0
<i>Source: 2020 U.S. Census Data; 2022 HMDA Data; 2022 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0.</i>						

COMMUNITY DEVELOPMENT TEST

The institution's CD performance demonstrates adequate responsiveness to CD needs in the Tulsa MSA AA through CD loans, QIs, and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for CD in the AA.

Community Development Loans

FOB originated 14 CD loans totaling \$23.3 million in the Tulsa MSA AA. This reflects a decrease from the 26 CD loans totaling \$43.1 million reported in this AA at the previous evaluation. The current adequate level represents 87.2 percent of the total CD loans, whereas this AA contains 99.8 percent of total loans.

The following lists a notable example of a CD loan in the Tulsa MSA AA.

- ***Economic Development*** - In 2021, the bank originated an \$8.9 million loan to purchase and construct a new recreational vehicle dealership and service facility. The facility provides jobs in the AA, including jobs for low- and moderate-income individuals. The activity promotes economic development by financing an entity that meets the size eligibility standards of the regulation and by supporting permanent job creation, retention, and improvement for low- and moderate-income persons

Qualified Investments

Since the prior evaluation, FOB made use of 14 QIs totaling \$5.3 million in the Tulsa MSA AA. By dollar volume, this equates to 91.3 percent of the total QIs, which reflects an adequate volume compared to this AA containing 96.3 percent of the bank's deposits.

The following list a notable example of a QI in the Tulsa MSA AA.

- ***Community Services*** - The bank made a \$1.0 million investment in a school bond to improve facilities at schools located in Tulsa County where a majority of students receive free or reduced lunches. As a result, this activity primarily benefits low- and moderate-income individuals.

Community Development Services

Since the prior evaluation, FOB provided 74 CD services in the Tulsa MSA AA, which represents 93.7 percent of the bank's total CD services. Comparatively, this AA contains 66.7 percent of the bank's total branches.

The following lists an example of a CD service in the Tulsa MSA AA.

- ***Community Services*** - Bank employees taught financial literacy classes to local Afghan refugees. The classes focused on how finances work in the United States, how to properly use credit cards, save money/budget, and how loans work. The individuals who participated

in the classes are primarily low- or moderate-income as they came to the United States with little to no financial backing and are in the process of seeking asylum status and citizenship.

OKLAHOMA NON-MSA- Limited-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN OKLAHOMA NON-MSA

The Oklahoma Non-MSA AA consist of all Payne County. The bank operates one full-service branch in this AA. The Oklahoma Non-MSA AA encompasses 23 census tracts reflecting the following income designations according to the 2020 U.S. Census Data: 2 low-, 6 moderate-, 7 middle-, and 6 upper-income census tracts, as well as 2 census tracts with no income designation. The following table shows select demographic and economic characteristics of the area.

Demographic Information of the Assessment Area Oklahoma Non-MSA AA						
Demographic Characteristics	#	Low %of#	Moderate %of#	Middle %of#	Upper %of#	NA* %of#
Geographies (Census Tracts)	23	8.7	26.1	30.4	26.1	8.7
Population by Geography	81,646	3.8	27.4	32.4	30.6	5.9
Housing Units by Geography	36,599	5.3	25.1	35.7	29.1	4.9
Owner-Occupied Units by Geography	16,201	0.1	17.8	35.8	45.6	0.8
Occupied Rental Units by Geography	15,145	9.5	31.1	35.4	16.3	7.7
Vacant Units by Geography	5,253	8.9	30.3	36.4	14.8	9.6
Businesses by Geography	8,831	6.0	24.3	31.5	35.9	2.3
Farms by Geography	460	2.2	17.0	26.1	54.1	0.7
Family Distribution by Income Level	16,712	17.8	17.3	16.6	48.3	0.0
Household Distribution by Income Level	31,346	29.2	16.7	15.9	38.2	0.0
Median Family Income - OK Non-MSA	\$58,565		Median Housing Value			\$148,868
			Median Gross Rent			\$835
			Families Below Poverty Level			11.3%
Source: 2020 U.S. Census; 2023 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 following table shows the applicable income ranges based on the estimated MFI of \$64,700 for the Oklahoma Non-MSA for 2022.

Median Family Income Ranges - Oklahoma Non-MSA				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper >120%
2022 (\$64,700)	<\$32,350	\$32,350 to <\$51,760	\$51,760 to <\$77,640	>\$77,640
Source: FF/EC.				

CONCLUSIONS ON PERFORMANCE CRITERIA IN OKLAHOMA NON-MSA AA

LENDING TEST

The institution's lending performance in the Oklahoma Non-MSA AA exceeds the lending performance for the institution overall. However, performance this AA did not impact overall conclusions.

Despite the low level of lending in this AA, examiners deemed the level reasonable, when considering the performance context data. Specifically, FOB operates one branch in this AA in the small community of Glencoe. The bank faces stiff competition from numerous financial institutions operating in the much larger nearby town of Stillwater, also located in Payne County, just 15 miles away. According to the June 30, 2023 FDIC Deposit Market Share Report, 21 of the 29 financial institution branches in Payne County are located in Stillwater.

Geographic Distribution

Small Business Loans

Geographic Distribution of Small Business Loans Oklahoma Non-MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	6.0	0	0.0	0	0.0
Moderate	24.3	1	50.0	100	25.0
Middle	31.5	0	0.0	0	0.0
Upper	35.9	1	50.0	300	75.0
Not Available	2.3	0	0.0	0	0.0
Totals	100.0	2	100	400	100
Source: 2023 D&B Data; 2023 Bank Data. Due to rounding, totals may not equal 100.0.					

Borrower Profile

Small Business Loans

Distribution of Small Business Loans by Gross Annual Revenues Oklahoma Non-MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	67.3	1	50.0	100	25.0
\$100,000 - \$249,999	14.4	0	0.0	0	0.0
\$250,000 - \$499,999	4.2	0	0.0	0	0.0
\$500,000 • \$1,000,000	2.1	1	50.0	300	75.0
Subtotal <= \$1,000,000	88.0	2	100.0	400	100.0
>\$1,000,000	2.8	0	0.0	0	0.0
Revenue Not Available	9.3	0	0.0	0	0.0
Total	100.0	2	100	400	100
<i>Source: 2023 D&B Data; 2023 Bank Data. Due to rounding, totals may not equal 100.0.</i>					

COMMUNITY DEVELOPMENT TEST

The institution's Community Development Test performance in the Oklahoma Non-MSA AA is consistent with the institution's community development performance overall. Refer to the overall Community Development Test section for details on CD activities in the Oklahoma Non-MSA AA.

APPENDICES

INTERMEDIATE 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 bank'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).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

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 bank 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.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI

facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
 - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

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.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;

- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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.

Qualified Investment: A lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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 Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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.

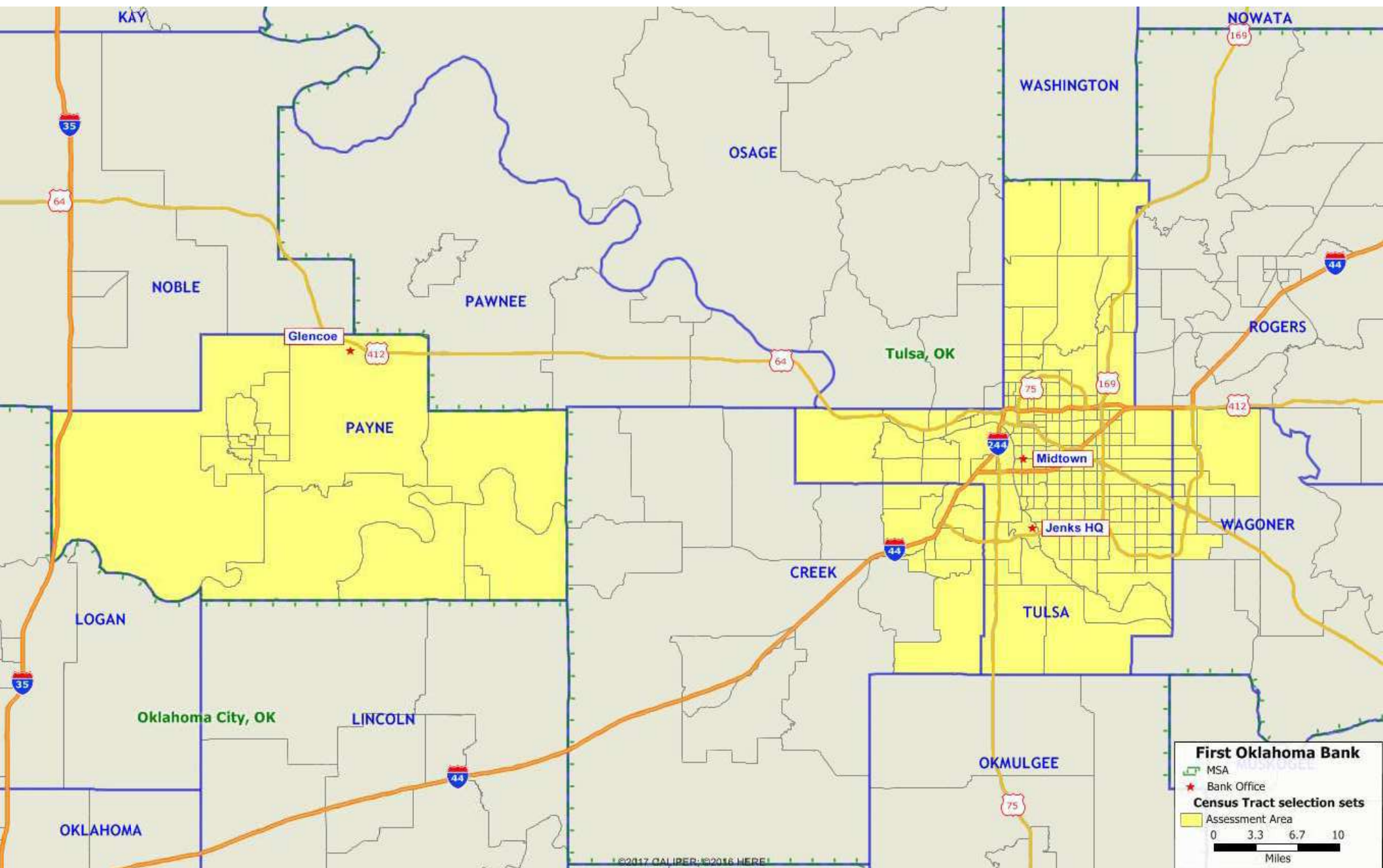
Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a

population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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.



**FEE SCHEDULE
SCHEDULE OF FEES**



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FEES AND CHARGES. The following fees and charges may be assessed against your account:

Check printing fees vary by the style of check ordered.

An overdraft fee of \$25.00 will be charged per item for covering overdrafts created by check or draft, in-person withdrawal, ATM withdrawal, or other electronic means.

Account Research

\$20.00/hour, 1/2 hour minimum

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Business RDA (Remote Deposit Anywhere)

\$.50 per deposit

Chargeback

\$5.00

Collection Items

\$10.00 per item

Dormant Accounts

\$5.00 per month

Fax

\$1.00 per page

Garnishments and Levies

\$15.00

Money Orders

\$2.00

Official Checks

\$5.00

Photocopies

\$.50 per page

Safe Deposit Box Rental

\$30.00 = 3x10

\$40.00 = 5x10

\$50.00 = 10x10

Statement Reprint

\$3.00

Stop Payments

\$25.00 in Person or by Phone

Wire Transfers

\$35.00 Domestic Outgoing



\$15.00 Domestic Incoming
\$55.00 International Outgoing
\$30.00 International Incoming

Zipper Bags (5 1/2" x 10 1/2")
\$5.00

ATM Fee Refund Restrictions:

- Refund does not apply to any fee(s) other than those assessed for using a First Oklahoma Bank Debit/ATM card at an ATM.
- Bring or send a copy of your receipts to us within 90 days of the transaction date.
- Max of \$5 per occurrence and \$25 per month (based on transaction date) eligible for refund, including international fees.

