



PUBLIC DISCLOSURE

May 23, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First FS & LA
Charter Number 703816

111 W. Commerce Street, Aberdeen, Mississippi 39730

Office of the Comptroller of the Currency
Nashville/Birmingham Field Office
3595 Grandview Parkway, Suite 655
Birmingham, Alabama 35243

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The Lending Test is rated: Satisfactory.

The major factors that support the satisfactory Lending Test rating include:

- First FS & LA’s (thrift) loan-to-deposit (LTD) ratio is more than reasonable.
- A substantial majority of the thrift’s loans are inside the assessment area (AA).
- The geographic distribution of home mortgage loans is reasonable.
- The borrower income distribution of home mortgage loans is reasonable.
- The thrift did not receive any CRA-related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the thrift’s size, financial condition, and credit needs of the AA, the thrift’s LTD ratio is more than reasonable. The quarterly average LTD ratio, calculated on an institution-wide basis, was 85.1 percent for the 16 quarters since the prior CRA evaluation. The thrift’s highest LTD ratio was 92.1 percent at December 31, 2021. The thrift’s lowest LTD ratio was 79.7 percent at September 30, 2020. We compared the thrift’s LTD ratio to two similarly-situated banks in Mississippi, with total assets between \$60.3 and \$77.5 million. For the 16-quarter period, the quarterly LTD ratio for these two financial institutions averaged 60.1 percent, with a low average of 44.0 percent and a high average of 76.2 percent.

Lending in Assessment Area

A substantial majority of the thrift’s loans are inside its AA.

The thrift originated 88.3 percent of its total loans inside the thrift’s AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	53	88.3	7	11.7	60	6,885	82.4	1,468	17.6	8,353
Total	53	88.3	7	11.7	60	6,885	82.4	1,468	17.6	8,353

Description of Institution

First FS & LA (thrift) is a federally chartered, mutual savings and loan association headquartered in Aberdeen, Mississippi (Monroe County). The thrift is a single-state institution with one full-service office in downtown Aberdeen, Mississippi, and no automated teller machines (ATMs). The thrift is not

a subsidiary of a holding company and did not open or close any branches during the evaluation period. Hours of operations are Monday through Friday from 9:00 am to 4:30 pm.

At December 31, 2021, the thrift reported total assets of \$47.3 million, deposits of \$39.5 million, and net loans of \$36.4 million, or 77 percent of total assets. Tier 1 capital totaled \$7.7 million, and the tier 1 leverage ratio was 16.3 percent. The thrift's primary loan product is one-to-four family mortgage loans. A breakdown of the thrift's loan portfolio shows one-to-four family mortgage loans at 88.4 percent, construction and land loans at 9 percent, share loans (secured by certificates of deposits or savings accounts) at 2.1 percent, and nonfarm nonresidential loans at 0.5 percent.

The thrift has one AA, made up of Monroe County, Mississippi, a Non-Metropolitan Statistical Area (MSA). The AA meets regulatory requirements and consists of a complete political subdivision that does not arbitrarily exclude low- or moderate-income geographies. The AA consists of nine census tracts (CTs) with an approximate population of 36 thousand. Of the nine CTs, none are low-income, one is moderate-income, six are middle-income, and two are upper-income. The AA is impacted by a high poverty rate of 15.5 percent. Manufacturing is the primary industry in the AA.

The previous CRA evaluation, dated April 23, 2018, was rated "Satisfactory." We found no legal or financial impediments adversely affecting the thrift's ability to help meet community credit needs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a review of the thrift's CRA performance in its AA of Monroe County, Mississippi using the Small Bank evaluation procedures, which include a Lending Test. The Lending Test evaluates the thrift's record of meeting the AA's credit needs through lending activities. Our assessment focused on the thrift's primary loan product of home mortgage loans, originated during the evaluation period of January 1, 2019, through December 31, 2021.

For the geographic and borrower distribution analyses, we compared First FS & LA's loan originations to 2015 American Community Survey (ACS) Census data and aggregate Home Mortgage Disclosure Act (HMDA) data.

Selection of Areas for Full-Scope Review

In each state where the thrift has an office, one or more of AAs within that state were selected for a full-scope review. For purposes of this evaluation, thrift delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, thrift delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The thrift's overall rating is based on performance in the state of Mississippi as this is the only rating area. The thrift's primary loan product is home mortgage loans. Refer to the "Scope" section for more details.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Mississippi

CRA rating for the State of Mississippi: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support the satisfactory Lending Test rating include:

- The thrift's LTD ratio is more than reasonable.
- A substantial majority of the thrift's loans are inside the AA.
- The geographic distribution of home mortgage loans is reasonable.
- The borrower income distribution for home mortgage loans is reasonable.
- The thrift did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in Mississippi

First FS & LA's primary business focus is the origination of one- to four-family mortgage loans. The thrift operates one full-service office and no ATMs within its AA of Monroe County. The AA consists of all nine CTs within Monroe County, Mississippi. During the evaluation period, the AA had no designated low-income CTs and only one moderate-income CT. The thrift's only office is within a middle-income CT.

Monroe County has a population of approximately 36 thousand. According to the U.S. Bureau of Labor Statistics (US BLS), the unemployment rate in the AA averaged 5.4 percent in 2019, 8.8 percent in 2020, and 5.2 percent in 2021, which is consistent with the state of Mississippi unemployment rates. Manufacturing is the primary industry in the AA. Some of the largest employers include United Furniture Industries (manufacturer), Tronox (chemical pigment plant), Eutaw Construction, HomeStretch (furniture manufacturer), North Mississippi Medical Center, and Monroe Regional Hospital.

Local competition in the AA is strong. The thrift's competition consists of three community banks and nine branches of larger, regional institutions. At June 30, 2021, the thrift ranked sixth in deposit share among eight financial institutions serving Monroe County. The thrift reported \$39 million in total deposits, or a 4.9 percent market share. The other seven institutions hold approximately \$766 million in deposits within the AA. The thrift also faces strong competition based on loan product offerings. The thrift offers fixed-rate mortgage loans with a loan term up to 15 years, and 30-year adjustable-rate mortgages with fixed-rate periods of five, seven, and ten years. The thrift's loans generally require a 20 percent down payment. Other local institutions offer a variety of mortgage products, including U. S. Department of Agriculture (USDA), Federal Housing Administration (FHA), and U.S. Department of Veterans Affairs (VA) loans that require minimal up-front fees and low down payments. The other institutions also offer mortgage loans with longer fixed-rate terms, including a 30-year fixed-rate mortgage. Some local institutions accept online mortgage loan applications, but the thrift typically requires in person applications.

We established two community contacts in the AA, including a local government official and a representative from a community-based organization. The contacts advised the primary credit needs of

the community are affordable housing and small business loans. Additionally, both contacts indicated that local financial institutions are active in meeting community credit needs.

Monroe County AA

The following table depicts the demographic information for the thrift’s AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Monroe County AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	11.1	66.7	22.2	0.0
Population by Geography	36,175	0.0	9.6	64.4	26.0	0.0
Housing Units by Geography	16,449	0.0	9.1	66.5	24.4	0.0
Owner-Occupied Units by Geography	10,408	0.0	7.4	66.0	26.6	0.0
Occupied Rental Units by Geography	3,528	0.0	14.9	66.4	18.7	0.0
Vacant Units by Geography	2,513	0.0	7.7	69.0	23.3	0.0
Businesses by Geography	1,930	0.0	16.3	65.2	18.5	0.0
Farms by Geography	90	0.0	3.3	58.9	37.8	0.0
Family Distribution by Income Level	9,662	20.0	17.2	19.1	43.6	0.0
Household Distribution by Income Level	13,936	23.6	14.5	15.5	46.4	0.0
Median Family Income Non-MSAs - MS		\$43,897	Median Housing Value			\$82,263
			Median Gross Rent			\$556
			Families Below Poverty Level			15.5%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Mississippi

The rating for Mississippi is based on a full-scope review of the thrift’s Monroe County AA. First FS & LA’s office is located within the AA, and a significant portion of the bank’s lending is centered there.

LENDING TEST

The thrift’s performance under the Lending Test in Mississippi is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the thrift's performance in the Monroe County AA is good.

Distribution of Loans by Income Level of the Geography

The thrift exhibits reasonable geographic distribution of loans in the State.

Home Mortgage Loans

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

The thrift's geographic distribution of home mortgage loans is reasonable. Our analysis is based on loan activity within one moderate-income CT because there are no low-income CTs in the AA. The thrift's distribution of loans in the moderate-income CT is below the percentage of owner-occupied housing and aggregate peer lending levels. The thrift has limited opportunities to originate home mortgage loans to borrowers in the moderate-income CT. The city of Amory is located in the moderate-income CT, which is approximately 16 miles north of Aberdeen, where the thrift's office is located. Competition from regional and community banks located in the city of Amory impedes the thrift's ability to originate home mortgage loans in this area. These financial institutions offer a larger variety of loan products and loan application options, including online applications, which the thrift does not offer.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The thrift's distribution of home mortgage loans to individuals of different income levels is reasonable. The thrift's mortgage lending to low- and moderate- income borrowers is lower than the percent of low-income families and the aggregate peer lending levels. This is reasonable given that opportunities to make loans to low-income borrowers are limited by the high percentage of families in the AA that live below the poverty line. Additionally, the thrift faces strong competition from financial institutions that offer a larger variety of loan products and mortgage loan programs.

Responses to Complaints

The thrift did not receive any CRA-related complaints during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not Applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Mississippi		
Monroe County, Mississippi AA	Full-Scope	All census tracts in Monroe County, Mississippi

Appendix B: Summary of MMSA and State Ratings

RATINGS: First FS & LA	
Overall Bank:	Lending Test Rating:
First FS & LA	Satisfactory
State:	
Mississippi	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

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

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$(000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
First FSLA	60	\$8,085	100	849	0.0	0	0.0	7.4	1.7	6.1	66.0	58.3	64.3	26.6	40	29.6	0.0	0	0.0	
Total	60	\$8,085	100	849	0.0	0	0.0	7.4	1.7	6.1	66.0	58.3	64.3	26.6	40	29.6	0.0	0	0.0	

*Source: 2015 ACS Census; 01/01/2019 - 12/21/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$(000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
First FSLA	60	\$8,085	100	849	20.0	0	3.4	17.2	1.7	13.1	19.1	21.6	18.6	43.6	76.7	46.9	0.0	0	18.0	
Total	60	\$8,085	100	849	20.0	0	3.4	17.2	1.7	13.1	19.1	21.6	18.6	43.6	76.7	46.9	0.0	0	18.0	

*Source: 2015 ACS Census ; 01/01/2019 - 12/21/2021 Bank Data
Due to rounding, totals may not equal 100.0%*