



PUBLIC DISCLOSURE

September 17, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Tucumcari Federal Savings & Loan Association
Charter Number 702842

301 South 1st Street
Tucumcari, NM 88401-2707

Office of the Comptroller of the Currency

Denver Field Office
1225 17th Street, Suite 450
Denver, CO 80202-5534

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

The Lending Test is rated: Satisfactory.

- The loan-to-deposit (LTD) ratio is more than reasonable given the institution's size, deposit market share, and the credit needs of the Assessment Area (AA).
- The bank's geographic distribution of 1-4 family loans is reasonable.
- The borrower distribution reflects reasonable penetration of 1-4 family loans to borrowers of different income levels.
- TFS&LA originated a majority of its loans within its AA.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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 MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancing's, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 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 MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

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

Description of Institution

Tucumcari Federal Savings & Loan Association (TFS&LA) is a \$33.6 million institution headquartered in Tucumcari, NM. TFS&LA is a single state institution and does not have any related organizations or operating subsidiaries.

TFS&LA operates in a single AA in eastern New Mexico with a single branch in the city of Tucumcari in Quay County, NM. The branch offers a drive-up facility, and does not have any ATMs. TFS&LA provides a limited number of deposit and loan products to individuals and small businesses and does not offer checking accounts. The bank's primary focus is residential real estate lending which represents 86 percent of total loans as of June 30, 2018.

TFS&LA's major competitors in the area include Wells Fargo, Citizens Bank, and FNB New Mexico. TFS&LA held a 15.8% deposit market share in the Quay County, NM AA as of June 30, 2017.

There are no financial, legal, or other factors impeding the bank's ability to help meet the credit needs in its assessment area. TFS&LA received a Satisfactory rating on its previous CRA examination dated March 11, 2013. Please refer to the bank's CRA public file for more information.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We performed a review of the bank's Community Reinvestment Act performance using the lending test criteria for small bank examinations. The lending test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. Based on the chart below, we determined the bank's primary product was residential real estate. Residential real estate represented 91 percent of total originations by number and 87 percent of total originations by dollar volume for the years 2015-2017. We selected a sample of 20 residential real estate loans for the period 2015-2016 and all of the residential loans (19) made in 2017.

TFS&LA Loan Originations from January 1, 2015 to December 31, 2017		
Loan Type	Volume by Numbers	Volume by Dollar \$(000's)
1-4 family Residential	104	8,282
Commercial RE	8	783
Multi Family	1	400
Mobile Home	1	18

Data Integrity

We did not perform a data integrity review as the institution is not a Home Mortgage Disclosure Act (HMDA) reporter.

Selection of Areas for Full-Scope Review

The bank identified a single AA, consisting of Quay County that it services in eastern New Mexico. We performed a full scope review of this AA. Please see Appendix A for more information.

Ratings

The bank's overall rating is based solely on the area that received a full scope review. The areas of the lending test were weighted equally. We placed more weight on the 2015-2016 timeframe than 2017 for the Geographic and Borrower Distribution tests. The 2017 period was given slightly less weight because there were not enough loans to pull a complete sample and ten percent of the loans did not have income information to adequately evaluate the borrower distribution.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that 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.

Conclusions with Respect to Performance Tests

LENDING TEST

TFS&LA lending performance is Satisfactory.

Loan-to-Deposit Ratio

The bank's loan to deposit ratio is more than reasonable given the institution's size, deposit market share, and the credit needs of the AA.

TFS&LA's average quarterly loan to deposit ratio for the review period was 85 percent, which compares favorably to its direct competitors in the AA which ranged from 70 to 81 percent with an average of 75 percent. As of June 30, 2017, TFS&LA held a 15.8 percent deposit market share of the AA. The loan-to deposit ratios are calculated on a bank wide basis. The details are shown in the chart below.

Loan-to-Deposit Ratios		
Institution	Total Assets \$ (000's) (As of 6/30/18)	Average Loan-to-Deposit Ratio
Tucumcari FS & LA	63,653	84.59%
Citizens Bank of Amarillo, TX	156,839	80.78%
FNB New Mexico	233,713	75.11%
Wells Fargo, NA	1,747,354,000	70.37%

Source: Institution reports from December 2012 to June 2018.

Lending in Assessment Area

The level of lending in the bank's assessment area is reasonable given the competition in the area and the average cost of home prices in the assessment area.

We selected a random sample of 20 loans originated during the review period and found TFS&LA originated a majority of their loans within their AA. As noted in the chart below, 65 percent of the loans by number and 47 percent of the loans by dollar amount were originated within the bank's AA. The variation in the dollar volume of loans is attributed to the lower average cost of real estate in the AA compared to the cost of real estate outside of the AA.

Table 1 - Lending in the New Mexico Rural Assessment Area										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
1-4 Family Real Estate Loans	13	65	7	35	20	710	47	780	53	1,480

Source: Loan sample.

Lending to Borrowers of Different Incomes

The distribution of 1-4 family loans reflects reasonable penetration of the bank's assessment area.

Tables 2 and 2A below show the bank's lending activity for 1-4 family loans to borrowers of different incomes for the 2015-2016 period and for 2017. We selected a random sample of 20 residential real estate loans from within the AA for 2015-2016 and all 19 of the residential real estate loans made in the AA in 2017. Loans from 2015-2016 were compared to 2010 U.S. Census data and 2017 loans were compared to 2015 ACS Census data. We weighted the 2015-2016 results higher as we were unable to pull a complete sample for 2017 and ten percent of the borrowers didn't have income information available.

The bank's 1-4 family lending was reasonable. In each of the two periods reviewed the bank was significantly below demographic comparators for low income borrowers, but its lending practices were near to performance of other banks in the AA based on the aggregate data. Bank lending to moderate income borrowers exceeded demographic data for the 2015-2016 period and was below demographic and aggregate data for 2017. Borrower information was not available for two loans in 2017, which represented 10.53 percent of the loan sample.

Geographic Distribution of Loans

The geographic distribution of 1-4 family loans within the bank's assessment area is reasonable. The assessment area does not include any low-income census tracts and lending to moderate income census tracts is reasonable.

Tables 3 and 3A below summarize the bank's geographic distribution of 1-4 family loans for the 2015-2016 period and for 2017. We utilized the same random sample of loans chosen for the previous test and compared it to the same census data and periods discussed previously.

The distribution of 1-4 family loans in moderate income census tracts is significantly below the demographic comparator for the 2015-2016 period but comparable with the aggregate market data for this period at 15 percent compared to the aggregate data of

14.6 percent. In 2017 census tract 9586.01 changed from a middle to a moderate income census tract. With only three CTs in the AA this had a significant effect on the demographic data. TFS&LA performance in 2017 exceeded the demographic comparator with 84 percent of its loans made in the moderate income CTs compared to 62.1 percent based on ASC Census data.

Responses to Complaints

TFS&LA did not receive any CRA related complaints during the review period.

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
New Mexico Rural	20	1,388	27.2	48	24.5	5.0	8.3	20.1	25.0	16.7	18.3	30.0	16.7	37.2	40.0	45.8	0.0	0.0	12.5
Total	20	1,388	27.2	48	24.5	5.0	8.3	20.1	25.0	16.7	18.3	30.0	16.7	37.2	40.0	45.8	0.0	0.0	12.5

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
New Mexico Rural	19	1,188	100	59	26.7	10.5	11.9	21.7	15.8	18.6	19.0	5.3	22.0	32.6	58.8	33.9	0.0	10.5	13.6
Total	19	1,188	100	59	26.7	10.5	11.9	21.7	15.8	18.6	19.0	5.3	22.0	32.6	58.8	33.9	0.0	10.5	13.6

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

Table 3 : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
New Mexico Rural	20	1,388	27.2	48	0.0	0.0	0.0	34.5	15.0	14.6	65.5	85.0	85.4	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	1,388	27.2	48	0.0	0.0	0.0	34.5	15.0	14.6	65.5	85.0	85.4	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table 3A : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
New Mexico Rural	19	1,188	100	59	0.0	0.0	0.0	62.1	84.0	61.0	37.9	16.0	39.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	19	1,188	100	59	0.0	0.0	0.0	62.1	84.0	61.0	37.9	16.0	39.0	0.0	0.0	0.0	0.0	0.0	0.0

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

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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/15 to 12/31/17) Investment and Service Tests and CD Loans: N/A	
Financial Institution	Products Reviewed	
TFS&LA Tucumcari, NM	1-4 Family Real Estate Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
New Mexico Rural	Full Scope	The AA consists of Quay County, NM

Appendix B: Community Profiles for Full-Scope Areas

New Mexico Rural AA 2015-2016: Census 2010

Demographic Information for Full Scope Area: New Mexico Rural AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	3	0.00	33.33	66.67	0.00	0.00
Population by Geography	9,041	0.00	32.55	67.45	0.00	0.00
Owner-Occupied Housing by Geography	2,844	0.00	34.49	65.51	0.00	0.00
Business by Geography	573	0.00	38.05	61.95	0.00	0.00
Farms by Geography	87	0.00	4.60	95.40	0.00	0.00
Family Distribution by Income Level	2,263	24.48	20.06	18.29	37.16	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	1,008	0.00	43.55	56.45	0.00	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		46,354 50,700 25%	Median Housing Value Unemployment Rate (2010 US Census)		68,154 3.35%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

TFS&LA designated Quay County, NM as its non-Metropolitan Statistical Area (MSA) AA. The designated area includes three census tracts (CTs): one middle-income CT and two moderate-income CTs. The middle-income CT has been designated as distressed and under served for poverty and population loss. This is a change from the 2010 census where the AA included two middle income tracts and one moderate-income tract. The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income (LMI) areas.

The primary economic drivers in the area are agriculture, consisting primarily of wheat, and tourism from Tucumcari's Route 66 attractions. The local economy has been flat the last 5 years with little growth. This is partially due to an ongoing drought that has negatively affected the agricultural industry which accounts for approximately \$50 - \$55 million in annual revenue for the area. Ninety-four percent of businesses reporting annual revenue figures are categorized as small businesses with annual revenues under \$1 million.

There is strong competition for deposits in the area given the small population and the concentration of competitors in the area. TFS&LA ranks last among its competitors in

both asset size and deposit share. Local competition comes from two regional banks; Citizens Bank and FNB New Mexico, and one national bank Wells Fargo, NA.

New Mexico Rural AA 2017: 2015 ACS Census

Demographic Information for Full Scope Area: New Mexico Rural AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	3	0.00	66.67	33.33	0.00	0.00
Population by Geography	8,698	0.00	67.56	32.44	0.00	0.00
Owner-Occupied Housing by Geography	2,380	0.00	62.14	37.86	0.00	0.00
Business by Geography	548	0.00	66.42	33.58	0.00	0.00
Farms by Geography	80	0.00	13.75	86.25	0.00	0.00
Family Distribution by Income Level	1,895	26.70	21.69	19.00	32.61	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	917	0.00	73.50	26.50	0.00	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2017 Households Below Poverty Level		49,356 52,300 18%	Median Housing Value Unemployment Rate (2015 ACS US Census)	74,916 1.79%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2015 ACS US Census and 2017 FFIEC updated MFI

Community Contact

We interviewed the Executive Director of a local organization to discuss their organization, the local area and economic conditions, and the banking needs of the community. The organization works to promote Tucumcari and Quay county businesses, stimulate economic development, and attract and grow new businesses. The area contact indicated the area's credit needs are being met and the area is fortunate to have as many banking institutions available in such a small community. The contact indicated the banks are active in the community and involved in many local boards providing them opportunities to identify and invest in community development opportunities.