

# **PUBLIC DISCLOSURE**

November 7, 2022

# 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

Independence Plaza 1050 17<sup>th</sup> Street Suite 1500 Denver, CO 80265-1050

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 this rating include:

- 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).
- Tucumcari Federal Savings & Loan Association (TFS&LA) originated a slight majority of loans within its AA.
- The bank's geographic distribution of home mortgage loans is reasonable.
- The borrower distribution reflects an excellent distribution of home mortgage loans to borrowers of different income levels.
- The bank has received no CRA-related complaints during the evaluation period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is more than reasonable.

The bank's average quarterly LTD ratio from March 2019 through December 2021 was 93.6 percent. The bank's ratios ranged from a high of 104.71 percent to a low of 86.77 percent during the evaluation period. The average LTD ratio of comparable institutions was 68.25 percent, with a high-average of 92.52 percent and a low-average of 45.63 percent during the same period. Comparable institutions have similar asset sizes, product offerings, and operate within a similar geographic region.

Loan-to-Deposit Ratios									
Institution	Total Assets \$	Average Loan-to- Deposit Ratio							
Tucumcari FS & LA	37,499	93.6%							
Citizens Bank of Amarillo, TX	228,143	73.69%							
First New Mexico Bank of Silver City	146,599	45.63%							
Western Bank of Clovis	64,392	92.52%							
American Heritage Bank	126,956	61.14%							

#### **Lending in Assessment Area**

A majority of the bank's loans are inside its AA. This analysis is performed at the bank, rather than the AA, level.

Examiners selected a random sample of 20 loans originated during the review period and found TFS&LA originated a slight majority of their loans within their AA. Based on our analysis, 53 percent of loans by dollar amount and 50 percent of loans by number were originated within the AA during the evaluation period. For lending outside the bank's delineated AA, much of the lending benefitted neighboring rural counties within New Mexico (NM).

Lending Inside and Outside of the Assessment Area													
	l 1	Number	of Loans			Dollar Amount of Loans \$(000s)							
Loan Category	Insi	de	Outside		Total	Inside		Outside		Total			
	#	%	#	%	#	\$	%	\$	%	\$(000s)			
1-4 Family Real Estate Loans	10	50	10	50	20	1,165,320	53	1,014,226	47	2,179,546			
Total	10	50	10	50	20	1,165,320	53	1,014,226	47	2,179,546			

# **Description of Institution**

Tucumcari Federal Savings & Loan Association (TFS&LA) is a \$37.6 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, located 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 75 percent of total loans as of December 31, 2021.

TFS&LA's major banking competitors in the area include New Mexico Bank & Trust, Citizens Bank, and Well Fargo Bank. TFS&LA held a 10.54 percent deposit market share in the Quay County, NM AA as of June 30, 2021.

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 September 17, 2018. Please refer to the bank's CRA public file for more information.

# **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The evaluation period included an assessment of loan originations from January 1, 2019, through December 31, 2021. Primary loan products were determined based on the number of originations for each broad loan type originated during the evaluation period. Based on the bank's significant volume of home mortgage loans, these were selected as the primary product. Commercial lending and consumer lending are not considered primary products.

TFS&LA Loan Originations from January 1, 2019 to December 31, 2021										
Loan Type	Volume by	Volume by								
	Number	Dollar \$(000's)								
Residential Real Estate	98	9,477								
Commercial	6	2,115								
Consumer	5	36								

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. Because TFS&LA reports only a single rural AA in New Mexico, a full-scope review was conducted for the AA. Also refer to appendix A, Scope of Examination, for summary details.

### **Ratings**

The bank's overall rating is based solely on the single AA which received a full-scope review.

# **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c), 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 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.

# **State Rating**

#### **State of New Mexico**

CRA rating for the State of New Mexico: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- While the LTD ratio was more than reasonable, about half of sampled loans were outside the delineated AA.
- The bank's geographic distribution of home mortgage loans is reasonable when considering performance in the distressed/underserved middle-income tract.
- The borrower distribution of home mortgage loans to borrowers of different income levels is excellent.

### **Description of Institution's Operations in New Mexico**

The bank services a single AA in eastern New Mexico, consisting of Quay County. The OCC performed a full scope review of this 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 underserved for poverty and population loss. The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income (LMI) areas.

#### Economic Data:

There is strong competition for deposits in the area considering the small population and the concentration of financial institutions in the area. TFS&LA ranks last among its competitors in both asset size, at \$37.6 million, and deposit market share of 10.54 percent. Local competition comes from regional and national banks; New Mexico Bank & Trust with 33.4 percent deposit market share, Citizens Bank with 32.5 percent deposit market share, and Wells Fargo Bank with 23.5 percent deposit market share. In addition, other non-depository institutions offer loans in the AA.

In Quay County the primary economic drivers are agriculture, ranching, the railroad, and tourism from Tucumcari's Route 66 attractions. Over the assessment period the local economy has been relatively stable, with a small amount of population growth from 2020 to 2021 after a previous multi-year trend of declining population.

Based on economic data from Moody's Analytics (July 2022), New Mexico's economy has been recovering steadily and the state has seen a tight labor market consistent with the nation overall. The construction and energy sectors were highlighted as having strong job growth. The energy industry is a key driver in the state's economy. The state's public sector is also significant, which helps provide some stability. Migration trends have improved slightly in recent years, boosting housing demand within the state. Though rising rates will impact demand, NM's housing pipeline remains full and construction job

growth should remain above average in the near term. While housing is generally less expensive in NM compared to the national average, trends within NM generally mirror nationwide trends, with increasing prices resulting in declining affordability.

Unemployment statistics reflect that Quay County fared worse than the state and nation in 2019 and 2021, but better than the state and nation in 2020.

Bureau of	Bureau of Labor and Statistics – Unemployment Data*										
	Quay County, NM	State of New Mexico	United States								
2019	5.3 %	4.9 %	3.7 %								
2020	7.2 %	8.1 %	8.1 %								
2021	7.1 %	6.8 %	5.3 %								

<sup>\*</sup>Data is based upon annual averages

#### Housing and Income Data:

Family and household income data reflect a substantial number of low- to moderate-income individuals, with 48.4 percent of families and 54.2 percent of households classified as either low- or moderate-income. Low-income families and households exceed moderate-income families and households. In addition, 12 percent of families are below the poverty level.

Within Quay County, moderate-income tracts correspond to the key population center of Tucumcari. Table A indicates that most housing units are in moderate-income tracts, including both owner-occupied and rental units. About 43 percent of total housing units are owner-occupied, and 17 percent are renter-occupied, with the remainder reflected as vacant. Quay County average home values as well as fair market rents fall below New Mexico's state averages, which is reflective of lower economic prosperity in the region. In comparison to other states, NM ranked 35<sup>th</sup> overall in housing affordability based on 2019 data from Moody's Analytics. Data from the National Association of Realtors indicates that Quay County housing values remain fairly low overall compared to many areas, with current median value of \$81,216.

Table A – Demographic Information of the Assessment Area												
Assessment Area: Rural NM AA (Quay County)												
Demographic Characteristics # Low Moderate % of # % of # Upper % of # % of #												
Geographies (Census Tracts)	3	0.0	66.7	33.3	0.0	0.0						
Population by Geography	8,698	0.0	67.6	32.4	0.0	0.0						
Housing Units by Geography	5,551	0.0	57.7	42.3	0.0	0.0						
Owner-Occupied Units by Geography	2,380	0.0	62.1	37.9	0.0	0.0						
Occupied Rental Units by Geography	967	0.0	77.7	22.3	0.0	0.0						
Vacant Units by Geography	2,204	0.0	44.1	55.9	0.0	0.0						
Businesses by Geography	678	0.0	65.6	34.4	0.0	0.0						
Farms by Geography	88	0.0	17.0	83.0	0.0	0.0						
Family Distribution by Income Level	1,895	26.7	21.7	19.0	32.6	0.0						
Household Distribution by Income Level	3,347	30.2	24.0	15.7	30.1	0.0						
Median Family Income Non-MSAs - NM		\$49,356	Median Housi	ing Value		\$74,916						

Median Gross Rent	\$472
Families Below Poverty Level	12.0%

Source: 2015 ACS and 2021 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.

Table B – Median Family Income Ranges											
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%							
NM Non-MSA Median Family Income (99999)											
2019 (\$53,100)	<\$26,550	\$26,550 to <\$42,480	\$42,480 to <\$63,720	≥\$63,720							
2020 (\$54,900)	<\$27,450	\$27,450 to <\$43,920	\$43,920 to <\$65,880	≥\$65,880							
2021 (\$54,600)	<\$27,300	\$27,300 to <\$43,680	\$43,680 to <\$65,520	≥\$65,520							
Source: FFIEC											

#### Community Contact:

Examiners considered information gathered from a community contact during the evaluation period. A leader at an organization that focuses on promoting and supporting local businesses in Quay County indicated that the major types of businesses in the area are tourism and agriculture. The major sources of employment in the area include the school district, government offices, tourism, medical facilities, and agriculture. The contact noted that Tucumcari's estimated population is at least 5,000 and includes seniors, retirees, and college-age individuals. The contact stated that housing is expensive and there are not enough rentals in the area. The organization is working on an infrastructure project that will help revitalize Tucumcari. The contact stated that they would like to see banks participate more in youth programs within the area.

# **Scope of Evaluation in New Mexico**

A full-scope review was performed for the rural non-MSA AA in New Mexico. See Appendix A for additional details.

### **Lending Test**

The bank's performance under the Lending Test in New Mexico is rated Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Rural NM AA is reasonable.

### Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state. There are no low-income CTs in the bank's AA.

#### Home Mortgage Loans

Refer to Table O in the state of New Mexico section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans in the AA is reasonable considering performance context. The percentage of bank loans in the moderate-income CTs is significantly below the percentage of owner-occupied housing units in the moderate-income CTs, and bank performance also significantly lags peer aggregate performance. However, the sole middle-income CT in the bank's AA was designated as distressed and underserved during the evaluation period; a significant portion of bank lending benefitted this tract, which supports a reasonable conclusion.

### Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels given the product lines offered by the bank.

#### Home Mortgage Loans

Refer to Table P in the state of New Mexico section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of the bank's home mortgage loans to borrowers of different income levels is excellent overall. The percentage of the bank's home mortgage loans to low-income borrowers is below the percentage of low-income families in the AA but exceeds the peer aggregate percentage. The percentage of home mortgage loans to moderate-income borrowers is above both the percentage of moderate-income families and the peer aggregate percentage. Given competitive factors, the bank's strong performance relative to peer aggregate was emphasized in the conclusion.

### **Responses to Complaints**

TFS&LA did not receive any CRA-related complaints during the review 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	
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Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type	of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
State of New Mexico		
Rural New Mexico AA	Full Scope	The AA Consists of Quay County, NM

# **Appendix B: Summary of MMSA and State Ratings**

	RATINGS	TUCUMCARI FS&LA
Overall Bank:		Lending Test Rating
Tucumcari FS&LA		Satisfactory
MMSA or State:		
New Mexico		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 30<sup>th</sup> 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 Q.** Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- **Table U.** Assessment Area Distribution of Consumer 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 households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography	Table O: Assessment	Area Distribution	i of Home Mortgage	e Loans by Incom	e Category of the Geogr	ranhv
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2019-2021

	Т	otal Ho	me Mo Loans	rtgage	Low-l	ncome	Tracts	Moderat	e-Incon	ne Tracts	Middle	-Income	e Tracts	Upper-	Income	Tracts	Not Av	ailable- Tracts	Income
Assessment Area:	#	\$		Overall Market	( lecunied		Aggregate	% of Owner- Occupied Housing Units		88 8	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate
Quay County	20	1,825	20.4	105	0.0	0.0	0.0	62.1	22	62.9	37.9	78	37.1	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	1,825	20.4	105	0.0	0.0	0.0	62.1	22	62.9	37.9	78	37.1	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 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 2019-2021																			
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Quay County	20	1,825	20.4	105	26.7	15	8.6	21.7	25.0	20.0	19.0	15	17.1	32.6	40.0	36.2	0.0	0.0	18.1
Total	20	1,825	20.4	105	26.7	15	8.6	21.7	25.0	20.0	19.0	15	17.1	32.6	40.0	36.2	0.0	0.0	18.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%