

PUBLIC DISCLOSURE

December 07, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Buffalo Federal Bank RSSD# 108072

106 Fort Street Buffalo, Wyoming 82834

Federal Reserve Bank of Kansas City 1 Memorial Drive Kansas City, Missouri 64198

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

Buffalo Federal Bank (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside the AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable penetration among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics and credit needs. Lending performance was assessed within the bank's Northeast Wyoming AA. The following data was reviewed:

- The bank's 17-quarter average NLTD ratio.
- The universe of 47 home mortgage loans originated between October 3, 2016 and December 31, 2019; and the universe of 61 small business loans originated between January 1, 2019 and December 31, 2019.

Greater weight was placed on the bank's small business loans given the bank's strategic focus on commercial lending.

While conclusions with respect to home mortgage lending performance were evaluated for multiple years, only 2017-2019 lending tables are reflected in the body of the report, with comparisons made to 2016 performance. The bank's 2016 lending data can be found in Appendix B of this report.

DESCRIPTION OF INSTITUTION

The bank is a community bank headquartered in Buffalo, Wyoming. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Crazy Woman Creek Bancorp, Inc.
- The bank has total assets of \$137.9 million (MM) as of June 30, 2020.
- In addition to its main office in Buffalo, the bank has two additional offices located in Sheridan and Gillette, Wyoming.

- The bank operates a home mortgage loan production office in Evanston, Wyoming.
- The bank operates three cash-dispensing automated teller machines, one in each branch location.
- The bank's primary business focus is commercial and residential lending.

TABLE 1 COMPOSITION OF LOAN PORTFOLIO AS OF JUNE 30, 2020							
Loan Type \$(000) %							
Commercial	53,564	56.3					
Residential Real Estate	25,738	27.1					
Agriculture	10,210	10.7					
Consumer	5,577	5.9					
Other	0	0.0					
Gross Loans	95,089	100.0					
Note: Percentages may not total 100.0 percent due to rounding.							

The bank was rated Satisfactory under the CRA at its October 3, 2016 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

DESCRIPTION OF ASSESSMENT AREA

The bank's Northeast Wyoming AA is comprised of Campbell, Johnson, and Sheridan Counties in their entireties (see Appendix A for an AA map).

- The AA is comprised of 11 middle- and 4 upper-income census tracts. There have been no changes to the bank's delineated AA since the previous examination; however, one census tract designation changed from moderate- to middle-income between 2016 and 2017.
- Based on the June 30, 2019 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank's deposit market share, at 4.2 percent, ranks 7th of 12 FDIC-insured institutions operating from a total of 30 offices within the AA.
- One interview with a member of the community within the bank's AA was conducted and one
 previously conducted interview as part of the CRA evaluation of another institution was used
 to ascertain the credit needs of the community, the responsiveness of area banks in meeting
 those credit needs, and the local economic conditions. The community members included
 one representative from a community-based development organization and another from an
 economic development organization.

TABLE 2 POPULATION CHANGE							
Area 2010 Population 2015 Population Percent Change							
Campbell County	46,133	48,013	4.1				
Johnson County	8,569	8,600	0.4				
Sheridan County	29,116	29,738	2.1				
State of Wyoming	563,626	579,679	2.8				
Source: 2010 U.S. Conque Burnou Door	, , , , , , , , , , , , , , , , , , ,	010,010	•				

Source: 2010 U.S. Census Bureau Decennial Census

2011-2015 U.S. Census Bureau: American Community Survey

- Johnson and Sheridan Counties have a relatively older population, with 20.0 percent and 17.5 percent, respectively, of individuals being 65 and older, compared to only 13.5 percent of the statewide population.
- Campbell County is the most populated county within the AA and experienced the largest population growth compared to the other counties in the AA and the state of Wyoming. A community member advised that individuals are relocating to Campbell County, which provides recreation centers and convention centers that are not typical in other communities of similar size.

TABLE 3 MEDIAN FAMILY INCOME CHANGE							
Area 2010 Median Family 2015 Median Family Percent Change							
Campbell County	83,965	87,858	4.6				
Johnson County	County 58,983		9.1				
Sheridan County	61,959	71,020	14.6				
State of Wyoming 65,964 73,194 11							
Source: 2006-2010 U.S. Census Bureau: American Community Survey 2011-2015 U.S. Census Bureau: American Community Survey							

- According to the 2015 American Community Survey (ACS), 32.7 percent of AA families were
 designated as LMI, which was lower than the statewide figure of 38.2 percent.
- In addition, only 5.1 percent of the AA's families were living below the poverty line, which was lower than the statewide figure of 7.7 percent.

TABLE 4 HOUSING COSTS CHANGE								
Median Housing Value Percent Median Gross Rent Pe						Percent		
Area	2010	2015	Change	2010	2015	Change		
Campbell County	197,700	212,200	7.3	795	936	17.7		
Johnson County	208,400	227,700	9.3	642	854	33.0		
Sheridan County	211,900	228,000	7.6	670	731	9.1		
State of Wyoming	174,000	194,800	12.0	666	789	18.5		
Source: 2006 2010 U.S. C	encus Rureau: Americ	can Community Sunya	N/					

Source: 2006-2010 U.S. Census Bureau: American Community Survey 2011-2015 U.S. Census Bureau: American Community Survey

- Based on the 2015 ACS data, the AA had 38,314 total housing units with 62.3 percent of those units being owner-occupied. Of the remaining units, 25.8 percent were rental properties, and 12.0 percent were vacant.
- A community member advised that while the local economy in Sheridan County was booming, the county faces challenges attracting skilled workers due to low housing affordability and a shortage of inventory.

TABLE 5 UNEMPLOYMENT RATES							
Region	2015	2016	2017	2018	2019		
Campbell County	3.9	7.1	4.9	4.1	3.7		
Johnson County	4.9	5.3	4.2	4.0	3.6		
Sheridan County	4.2	4.6	3.9	4.0	3.5		
State of Wyoming 4.2 5.3 4.2 4.1 3.6							
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics							

- A community member advised that the economy in Sheridan County is diversified and has attracted many new businesses to the area, such as Weatherby Gun Manufacturing Company, one of the largest producers of guns in the country.
- The community members also stated that Wyoming is supportive of business concerns and interests, evidenced by economic development teams within the bank's AA that are supporting business needs and creating beneficial programs.
- Further, a community member advised development organizations are connecting small businesses to grants and funding, such as the Wyoming Smart Capital Network and the Small Business Development Center.
- Major employers in the AA include: Sheridan College, Boardwalk Real Estate Investment Trust, Navajo Transitional Energy Company, Sheridan VA Medical Center, Cyclone Drilling, county and city governments, county school districts, L&H Industrial, Peabody Energy, and Arch Coal.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, and geographic location. The bank's NLTD ratio is reasonable, as it is above two similarly situated institutions and comparable to one similarly situated institution.

TABLE 6 COMPARATIVE NLTD RATIOS							
Institution Leastion Asset Size (\$000c) NLTD Ratio (%)							
Institution	Location	Asset Size (\$000s)	17- Quarter Average				
Buffalo Federal Bank	Buffalo, WY	137,859	80.0				
First Federal Bank and Trust Company	Sheridan, WY	371,523	74.4				
Cowboy State Bank	Ranchester, WY	50,196	68.5				
First Northern Bank of Wyoming	Buffalo, WY	472,215	78.9				

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. A majority of the bank's loans, by number and dollar, are originated inside the AA.

TABLE 7 LENDING INSIDE AND OUTSIDE THE AA								
Loon Tyme	Inside				Outside			
Loan Type	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Mortgage Loans	37	7,916	78.7	83.5	10	1,562	21.3	16.5
Small Business Loans	52	5,296	85.2	94.8	9	291	14.8	5.2
Total Loans	89	13,212	82.4	87.7	19	1,853	17.6	12.3
Note: Percentages may not add to 100.0								

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AA by income level of census tracts. The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts within the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. As illustrated in Table 8, the bank's performance in the middle-income census tracts is above the percentage of owner-occupied housing units, and lending in upper-income census tracts is below the percentage of owner-occupied housing units.

The bank's distribution of home mortgage lending in 2016 was consistent with 2017-2019 lending performance, with no loans originated in the sole moderate-income census tract and a majority of loans made in the middle-income census tracts. Greater weight was given to the 2017-2019 lending performance, given the greater loan volume.

Loan dispersion was also evaluated, and although the analysis did reveal some gaps in lending among geographies in the AA, these gaps were not considered significant due to the level of banking competition within these areas.

TABLE 8 DISTRIBUTION OF 2017-2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY							
Census Tract		Bank Loans					
Income Level	#	\$(000)	#%	\$%	Units		
Low	0	0	0.0	0.0	0.0		
Moderate	0	0	0.0	0.0	0.0		
Middle	30	6,498	90.9	89.6	67.3		
Upper	3	756	9.1	10.4	32.7		
Unknown	0	0	0.0	0.0	0.0		
Not Reported	0	0	0.0	0.0	0.0		

Source: 2019 FFIEC Census Data

2011 – 2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The geographic distribution of small business lending is reasonable. As illustrated in Table 9, the bank's lending in the middle-income census tracts is above the percentage of businesses operating in middle-income census tracts within the bank's AA. In addition, the bank's lending in the upper-income census tracts is below the percentage of businesses operating in upper-income census tracts. Loan dispersion was also evaluated and no significant gaps or lapses in lending were identified.

TABLE 9 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY							
Census Tract			Loans		% of		
Income Level	#	\$(000)	#%	\$%	Businesses		
Low	0	0	0.0	0.0	0.0		
Moderate	0	0	0.0	0.0	0.0		
Middle	48	5,114	92.3	96.6	80.6		
Upper	4	182	7.7	3.4	19.4		
Unknown	0	0	0.0	0.0	0.0		
Not Reported	0	0	0.0	0.0	0.0		

Source: 2019 FFIEC Census Data

2019 Dun & Bradstreet Data

2011 – 2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. The bank's lending has a reasonable penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. As illustrated in Table 10, the bank's lending to low-income borrowers, by number, was comparable to the percentage of low-income families in the AA. Additionally, the bank's lending to moderate-income borrowers, by number and dollar, exceeded the demographic.

The bank's distribution of home mortgage lending in 2016 reflected weaker performance in lending to low-income borrowers and stronger performance in lending to moderate-income borrowers.

TABLE 10 DISTRIBUTION OF 2017-2019 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL							
Borrower		Bank Loans					
Income Level	#	\$(000)	#%	\$%	Family Income %		
Low	5	482	15.2	6.6	16.7		
Moderate	7	1,459	21.2	20.1	16.0		
Middle	9	1,988	27.3	27.4	22.4		
Upper	12	3,325	36.4	45.8	44.9		
Unknown	0	0	0.0	0.0	0.0		

Source: 2019 FFIEC Census Data

2011 – 2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

<u>Small Business Lending</u>

The borrower distribution of small business lending is reasonable. As noted in Table 11, the bank's performance was below the percentage of total businesses operating in the AA with revenues of \$1MM or less. However, further review of business loans by dollar amount reveals that 92.3 percent were originated in loan amounts of \$250,000 or less. This characteristic, used as a proxy to estimate the bank's support of smaller businesses, indicates the bank is willing to loan to smaller businesses that typically do not have the need or capacity to borrow large amounts.

Additionally, demand for small business loans within the community may be limited. As mentioned previously, economic development organizations are working to connect businesses to grants and funding opportunities within the bank's AA. Further, aggregate lending data reported by CRA filers operating in the AA indicated that lending to businesses with revenue of \$1MM or less is occurring at lower levels; 51.9 percent by number and 41.2 percent by dollar. While institutions included in the aggregate lending data are not a direct comparison to the bank as it is not a CRA reporter, aggregate lending levels are reflective of the overall demand for credit from small businesses in the AA.

TABLE 11 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES							
		Bank	Loans		Total Businesses		
	#	\$(000)	#%	\$%	%		
		By Reve	nue				
\$1 Million or Less	40	3,680	76.9	69.5	90.7		
Over \$1 Million	12	1,616	23.1	30.5	7.7		
Not Known	0	0	0.0	0.0	1.6		
Total	52	5,295	100.0	100.0	100.0		
		By Loan	Size				
\$100,000 or less	36	1,432	69.2	27.0			
\$100,001 - \$250,000	12	1,990	23.1	37.6			
\$250,001 – \$1 Million	4	1,873	7.7	35.4			
Total	52	5,295	100.0	100.0			
By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	30	1,200	75.0	32.6			
\$100,001 - \$250,000	8	1,255	20.0	34.1			
\$250,001 – \$1 Million	2	1,225	5.0	33.3			
Total	40	3,680	100.0	100.0			

Source: 2019 FFIEC Census Data

2019 Dun & Bradstreet Data

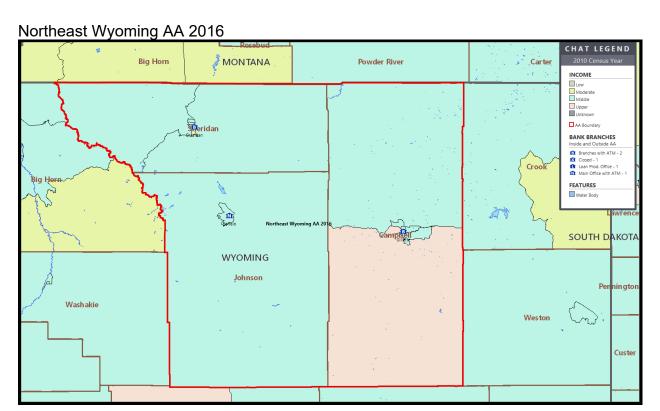
2011 – 2015 U.S. Census Bureau: American Community Survey

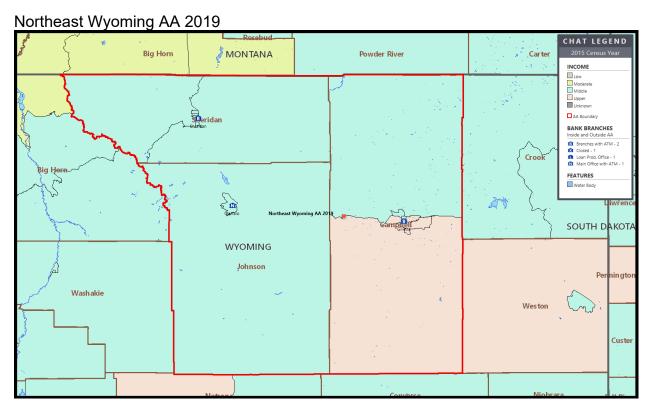
NOTE: Percentages may not add up to 100.0 due to rounding.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A - MAP OF THE ASSESSMENT AREA





APPENDIX B - DEMOGRAPHIC INFORMATION

	2016	NORTHE		LE B-1 MING AA [DEMOGR <i>A</i>	APHICS		
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
, and the second	# %		#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,530	16.3
Moderate	1	6.7	1,295	6.0	119	9.2	3,720	17.1
Middle	12	80.0	16,644	76.7	1,035	6.2	4,681	21.6
Upper	2	13.3	3,775	17.4	75	2.0	9,783	45.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	15	100.0	21,714	100.0	1,229	5.7	21,714	100.0
	Housing			Housi	ng Type by T	Fract		
	Units by	O	wner-occupie	ed	Rei	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,361	1,449	6.2	61.4	823	34.9	89	3.8
Middle	28,130	18,048	77.0	64.2	6,961	24.7	3,121	11.1
Upper	5,092	3,939	16.8	77.4	722	14.2	431	8.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	35,583	23,436	100.0	65.9	8,506	23.9	3,641	10.2
	Total Bu	inacas		Busine	sses by Tra	ct & Revenu	e Size	
	Total Bus by T		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	306	7.5	271	7.4	35	8.4	0	0.0
Middle	3,365	82.2	2,981	81.9	350	83.5	34	91.9
Upper	425	10.4	388	10.7	34	8.1	3	8.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,096	100.0	3,640	100.0	419	100.0	37	100.0
Percent	age of Total E	Businesses:		88.9		10.2		0.9
	Total F			Farm	s by Tract &	Revenue Si	ze	
	Total F by Tr		Less That		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	
Moderate	5	1.9	4	1.6	1	33.3	0	0.0
Middle	218	84.2	216	84.4	2	66.7	0	0.0
Upper	36	13.9	36	14.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	259	100.0	256	100.0	3	100.0	0	0.0
	rcentage of T			98.8		1.2		0.0

Source: 2016 FFIEC Census Data 2016 Dun & Bradstreet Data

2006 - 2010 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

TABLE B-2 DISTRIBUTION OF 2016 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY

Census Tract		% of Owner-			
Income Level	#	\$(000)	#%	\$%	Occupied Units
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	6.2
Middle	4	662	100.0	100.0	77.0
Upper	0	0	0.0	0.0	16.8
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

Source: 2016 FFIEC Census Data

2006-2010 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.

TABLE B-3 DISTRIBUTION OF 2016 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL

Borrower Income		Families by			
Level	#	\$(000)	#%	\$%	Family Income %
Low	0	0	0.0	0.0	16.3
Moderate	2	204	50.0	30.8	17.1
Middle	1	83	25.0	12.5	21.6
Upper	1	375	25.0	56.6	45.1
Unknown	0	0	0.0	0.0	0.0

Source: 2016 FFIEC Census Data

2006-2010 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.

	2017	NORTHE <i>A</i>		E B-4 IING AA D	EMOGRA	PHICS			
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	3,711	16.7	
Moderate	0	0.0	0	0.0	0	0.0	3,565	16.0	
Middle	11	73.3	14,389	64.7	724	5.0	4,996	22.4	
Upper	4	26.7	7,866	35.3	414	5.3	9,983	44.9	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	15	100.0	22,255	100.0	1,138	5.1	22,255	100.0	
				Housin	g Type by T	ract			
	Housing	Ov	vner-occupi	ed	Rer	ntal	Vaca	ant	
	Units by Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	0	0	0.0	0.0	0	0.0	0	0.0	
Middle	26,709	16,050	67.3	60.1	7,093	26.6	3,566	13.4	
Upper	11,605	7,813	32.7	67.3	2,781	24.0	1,011	8.7	
Unknown	0	0	0.0	0.0	0	0.0	, 0	0.0	
Total AA	38,314	23,863	100.0	62.3	9,874	25.8	4,577	11.9	
		Businesses by Tract & Revenue Size							
	Takal Dara	•		Dusilles	ses by Trac	i a Revenu	e Size		
	Total Bus by Tr		Less Th	nan or =	Over \$1		Revenu		
	by Tr	act	\$1 M	nan or = illion	Over \$1	Million	Revenu Repo	rted	
Low	by Tr	ract %	\$1 M #	nan or = illion %	Over \$1 #	Million %	Revenu Repo #	rted %	
Low Moderate	by Tr	% 0.0	\$1 M	nan or = illion %	Over \$1	Million % 0.0	Revenu Repo #	rted 0.0	
Moderate	# 0 0	% 0.0 0.0	\$1 M # 0 0	nan or = illion % 0.0 0.0	Over \$1 # 0 0	Million % 0.0 0.0	Revenu Repo # 0	7ted % 0.0 0.0	
Moderate Middle	by Tr # 0 0 2,807	% 0.0 0.0 76.5	\$1 M # 0 0 2,460	nan or = illion % 0.0 0.0 76.4	Over \$1 # 0 0 316	% 0.0 0.0 76.3	Revenue Repo # 0 0 31	0.0 0.0 91.2	
Moderate Middle Upper	# 0 0	0.0 0.0 0.0 76.5 23.5	\$1 M # 0 0	nan or = illion % 0.0 0.0 76.4 23.6	Over \$1 # 0 0	% 0.0 0.0 76.3 23.7	Revenu Repo # 0	0.0 0.0 0.0 91.2 8.8	
Moderate Middle	by Tr # 0 0 2,807 863 0	% 0.0 0.0 76.5	\$1 M # 0 0 2,460 762 0	nan or = illion % 0.0 0.0 76.4 23.6 0.0	Over \$1 # 0 0 316 98	% 0.0 0.0 76.3	Revenu Repo # 0 0 31 3	0.0 0.0 91.2 8.8 0.0	
Moderate Middle Upper Unknown Total AA	by Tr # 0 0 2,807 863	7act 0.0 0.0 76.5 23.5 0.0 100.0	\$1 M # 0 0 2,460 762	nan or = illion % 0.0 0.0 76.4 23.6	Over \$1 # 0 0 316 98 0	Million % 0.0 0.0 76.3 23.7 0.0	Revenue Repo # 0 0 31 3 0	0.0 0.0 0.0 91.2 8.8	
Moderate Middle Upper Unknown Total AA	# 0 0 2,807 863 0 3,670 age of Total Br	76.5 23.5 0.0 100.0 usinesses:	\$1 M # 0 0 2,460 762 0	nan or = illion % 0.0 0.0 76.4 23.6 0.0 100.0 87.8	Over \$1 # 0 0 316 98 0 414	Million % 0.0 0.0 76.3 23.7 0.0 100.0 11.3	Revenu Repo # 0 0 31 3 0 34	0.0 0.0 91.2 8.8 0.0 100.0	
Moderate Middle Upper Unknown Total AA	# 0 0 2,807 863 0 3,670	76.5 23.5 0.0 100.0 usinesses:	\$1 M # 0 0 2,460 762 0	nan or = illion	Over \$1 # 0 0 316 98 0 414	Million % 0.0 0.0 76.3 23.7 0.0 100.0 11.3 Revenue Si	Revenu Repo # 0 0 31 3 0 34	0.0 0.0 91.2 8.8 0.0 100.0 0.9	
Moderate Middle Upper Unknown Total AA	# 0 0 2,807 863 0 3,670 age of Total Fa	76.5 23.5 0.0 100.0 usinesses:	\$1 M # 0 0 2,460 762 0 3,222	nan or = illion	Over \$1 # 0 0 316 98 0 414 by Tract &	Million % 0.0 0.0 76.3 23.7 0.0 100.0 11.3 Revenue Si	Revenue Repo # 0 0 31 3 0 34 ze	0.0 0.0 91.2 8.8 0.0 100.0 0.9	
Moderate Middle Upper Unknown Total AA	# 0 0 0 2,807 863 0 3,670 age of Total Be by Tra	0.0 0.0 76.5 23.5 0.0 100.0 usinesses:	\$1 M # 0 0 2,460 762 0 3,222 Less Tha \$1 Mil	nan or = illion % 0.0 0.0 76.4 23.6 0.0 100.0 87.8 Farms an or =	Over \$1 # 0 0 316 98 0 414 by Tract & Over \$1	Million % 0.0 0.0 76.3 23.7 0.0 100.0 11.3 Revenue Si Million	Revenue Repo # 0 0 31 3 0 34 ze Revenue Repor	0.0 0.0 91.2 8.8 0.0 100.0 0.9	
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Moderate Middle Upper Unknown Total AA Percenta Low Moderate	# 0 0 2,807 863 0 3,670 age of Total Faby Tra	0.0 0.0 0.0 76.5 23.5 0.0 100.0 usinesses: arms act	\$1 M # 0 0 2,460 762 0 3,222 Less Tha \$1 Mil #	nan or = illion	Over \$1 # 0 0 316 98 0 414 by Tract & Over \$1 # 0 0	Million % 0.0 0.0 76.3 23.7 0.0 100.0 11.3 Revenue Si Million % 0.0 0.0	Revenue Repo # 0 0 31 3 0 34 ze Revenue Repor # 0 0 0	7ted 0.0 0.0 91.2 8.8 0.0 100.0 0.9 e Not ted 0.0 0.0	
Moderate Middle Upper Unknown Total AA Percenta Low Moderate Middle	# 0 0 2,807 863 0 3,670 age of Total Fabry Tra	0.0 0.0 76.5 23.5 0.0 100.0 usinesses: arms act	\$1 M # 0 0 2,460 762 0 3,222 Less Th: \$1 Mil #	nan or = illion	Over \$1 # 0 0 316 98 0 414 by Tract & Over \$1 # 0 0 2	Million % 0.0 0.0 76.3 23.7 0.0 100.0 11.3 Revenue Si Million % 0.0 0.0 100.0	Revenue Report # 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0.0 0.0 91.2 8.8 0.0 100.0 0.9 e Not ted % 0.0 0.0 0.0	
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Moderate Middle Upper Unknown Total AA Percenta Low Moderate Middle Upper Unknown Total AA	# 0 2,807 863 0 3,670 age of Total Br by Tra by Tra # 0 0 202 36 0	7act	\$1 M # 0 2,460 762 0 3,222 Less Tha \$1 Mil # 0 200 36	nan or = illion	Over \$1 # 0 0 316 98 0 414 by Tract & Over \$1 # 0 0 0 0 0 0	Million % 0.0 0.0 76.3 23.7 0.0 100.0 11.3 Revenue Si Million % 0.0 0.0 100.0 0.0 0.0	Revenue Repo # 0 0 31 31 3 0 34 ze Revenue Repor # 0 0 0 0 0 0	0.0 0.0 91.2 8.8 0.0 100.0 0.9 e Not ted 0.0 0.0 0.0 0.0 0.0	

Source: 2017 FFIEC Census Data 2017 Dun & Bradstreet Data

2011 – 2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

	2018	NORTHE		LE B-5 MING AA D	DEMOGRA	APHICS			
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	3,711	16.7	
Moderate	0	0.0	0	0.0	0	0.0	3,565	16.0	
Middle	11	73.3	14,389	64.7	724	5.0	4,996	22.4	
Upper	4	26.7	7,866	35.3	414	5.3	9,983	44.9	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	15	100.0	22,255	100.0	1,138	5.1	22,255	100.0	
				Housir	ng Type by	Fract			
	Housing	Ov	vner-occupi	ed	Rer	ntal	Vaca	ant	
	Units by Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	0	0	0.0	0.0	0	0.0	0	0.0	
Middle	26,709	16,050	67.3	60.1	7,093	26.6	3,566	13.4	
Upper	11,605	7,813	32.7	67.3	2,781	24.0	1,011	8.7	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	38,314	23,863	100.0	62.3	9,874	25.8	4,577	11.9	
			Businesses by Tract & Revenue Size						
	Total Bus by T		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	4,224	79.4	3,821	79.4	333	76.6	70	89.7	
Upper	1,099	20.6	989	20.6	102	23.4	8	10.3	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
-								400.0	
Total AA	5,323	100.0	4,810	100.0	435	100.0	78	100.0	
			4,810	100.0 88.2	435	100.0 10.0	78	1.8	
	ge of Total B	usinesses:	4,810	88.2	435 s by Tract &	10.0			
		usinesses: arms	4,810 Less Tha \$1 Mil	88.2 Farms an or =		10.0 Revenue Si		1.8 e Not	
	ge of Total B Total F	usinesses: arms	Less Tha	88.2 Farms an or =	s by Tract &	10.0 Revenue Si	ze Revenu	1.8 e Not	
	ge of Total B Total F by Tr	usinesses: arms act	Less Tha	88.2 Farms an or = Ilion	s by Tract & Over \$1	10.0 Revenue S Million %	ze Revenu Repor	1.8 e Not ted	
Percenta	ge of Total B Total F by Tr #	usinesses: arms act	Less That \$1 Mil	88.2 Farms an or = Ilion	s by Tract & Over \$1	10.0 Revenue Si Million	ize Revenu Repor #	1.8 e Not ted % 0.0	
Percenta Low Moderate	ge of Total B Total F by Tr # 0 0	wsinesses: arms act 0.0 0.0	Less Tha \$1 Mil # 0	88.2 Farms an or = Ilion 0.0 0.0	S by Tract & Over \$1 # 0 0	Million 0.0 0.0 0.0	ze Revenue Repor #	1.8 e Not ted 0.0 0.0	
Low Moderate Middle	ge of Total B Total F by Tr # 0 0 233	wsinesses: arms act 0.0 0.0 86.3	Less Tha \$1 Mil # 0 0 231	88.2 Farms an or = Ilion 0.0 0.0 86.2	S by Tract & Over \$1 #	10.0 Revenue S Million % 0.0 0.0 100.0	Revenue Repor # 0 0	1.8 e Not ted 0.0 0.0 0.0	
Low Moderate Middle Upper	ge of Total B Total F by Tr # 0 0	wsinesses: arms act 0.0 0.0	Less Tha \$1 Mil # 0	88.2 Farms an or = Ilion 0.0 0.0	S by Tract & Over \$1 # 0 0 2	Million 0.0 0.0 0.0	Revenue Repor # 0 0 0	1.8 e Not ted 0.0 0.0 0.0 0.0	
Low Moderate Middle Upper Unknown	ge of Total B Total F by Tr # 0 0 233 37	wsinesses: arms act 0.0 0.0 86.3 13.7 0.0	Less Tha \$1 Mil # 0 0 231 37 0	88.2 Farms an or = Illion 0.0 0.0 86.2 13.8 0.0	o by Tract & Over \$1 # 0 0 2 0 0 0	10.0 Revenue S Million 0.0 0.0 100.0 0.0 0.0	Revenue Repor # 0 0 0 0	1.8 e Not ted 0.0 0.0 0.0 0.0 0.0	
Low Moderate Middle Upper Unknown Total AA	ge of Total B Total F by Tr # 0 0 233 37 0	wsinesses: arms act % 0.0 0.0 86.3 13.7 0.0 100.0	Less Tha \$1 Mil # 0 0 231 37	88.2 Farms an or = Ilion 0.0 0.0 86.2 13.8	S by Tract & Over \$1 # 0 0 2 0	10.0 Revenue S Million % 0.0 0.0 100.0 0.0	Revenue Repor # 0 0 0 0 0	1.8 e Not ted % 0.0 0.0 0.0 0.0	

Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data

2011 – 2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.

	2019	NORTHE		LE B-6 MING AA [DEMOGRA	APHICS			
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	3,711	16.7	
Moderate	0	0.0	0	0.0	0	0.0	3,565	16.0	
Middle	11	73.3	14,389	64.7	724	5.0	4,996	22.4	
Upper	4	26.7	7,866	35.3	414	5.3	9,983	44.9	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	15	100.0	22,255	100.0	1,138	5.1	22,255	100.0	
			·	Housir	ng Type by	Tract	,		
	Housing	Ov	vner-occupi		Rer		Vac	ant	
	Units by Tract	#	% by	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	0	0	0.0	0.0	0	0.0	0	0.0	
Middle	26,709	16,050	67.3	60.1	7,093	26.6	3,566	13.4	
Upper	11,605	7,813	32.7	67.3	2,781	24.0	1,011	8.7	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	38,314	23,863	100.0	62.3	9,874	25.8	4,577	11.9	
1 Otal AA	·	Businesses by Tract & Revenue Size							
	Total Bus		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	4,547	80.6	4,137	80.9	329	75.8	81	92.0	
Upper	1,091	19.4	979	19.1	105	24.2	7	8.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	5,638	100.0	5,116	100.0	434	100.0	88	100.0	
	ge of Total B		<u> </u>	90.7	.,.	7.7		1.6	
	Ĭ		Farms by Tract & Revenue Size						
	Total F by Tr		Less Tha	an or =	Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	232	87.2	230	87.1	2	100.0	0	0.0	
Upper	34	12.8	34	12.9	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	266	100.0	264	100.0	2	100.0	0	0.0	
	200	100.01	204	100.0		100.01			
	centage of To		204	99.2		0.8		0.0	

Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data

2011 – 2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.

APPENDIX C - GLOSSARY

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

Census tract: 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 statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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 nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

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

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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

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