



PUBLIC DISCLOSURE

February 24, 2025

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

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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 more than 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.
- An excellent distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* 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. In addition, available aggregate data for the most recent three years (2021, 2022, and 2023) was referenced for additional perspective to gauge credit demand within the bank's AA. Lending performance was assessed within the bank's single AA. Examiners reviewed the following data:

- The bank's 17-quarter average NLTD ratio,
- A sample of 50 small business loans from a universe of 67 loans originated between January 1, 2023 and December 31, 2023; and,
- The universe of 65 home mortgage loans originated between December 8, 2020 and December 31, 2023.

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

DESCRIPTION OF INSTITUTION

Buffalo Federal Bank, operating as The Banks of Buffalo, Gillette, and Sheridan, 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 \$188.4 million as of September 30, 2024.
- In addition to its main office in Buffalo, Wyoming, 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 (ATMs), one in each branch location.
- As shown in the table below, the bank's primary business focus is commercial lending and home mortgage lending.

Table 1

Composition of Loan Portfolio as of September 30, 2024		
Loan Type	\$(000)	%
Construction and Land Development	4,528	3.3
Farmland	13,415	9.8
1- to 4-Family Residential Real Estate	43,536	31.7
Multifamily Residential Real Estate	822	0.6
Nonfarm Nonresidential Real Estate	49,494	36.0
Agricultural	3,924	2.9
Commercial and Industrial	15,126	11.0
Consumer	5,707	4.1
Other	1,000	0.7
Gross Loans	137,552	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its December 7, 2020, 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 consists of Campbell, Johnson, and Sheridan Counties in their entirety (see Appendix A for an AA map and Appendix B for additional demographic data).

- There have been no changes to the AA delineation since the prior examination.
- The AA is comprised of 3 moderate-, 15 middle-, and 2 upper-income census tracts. The AA's composition at the previous performance evaluation was comprised of 11 middle- and 4 upper-income census tracts.
- Based on the June 30, 2024 FDIC Deposit Market Share Report, the bank's AA market share, at 4.9 percent, ranks 7th of 14 FDIC-insured institutions operating from 30 offices within the AA.

- To further augment the CRA performance evaluation, a recently conducted interview with a member of the community within the AA was reviewed to ascertain the credit needs of the area communities and for perspective on the local economic conditions. The community member represents a local business organization with knowledge of local economic and business trends.

Table 2

Population Change Assessment Area: Northeast Wyoming			
Area	2015 Population	2020 Population	Percent Change
Northeast Wyoming	86,351	86,394	0.0
Campbell County, WY	48,013	47,026	(2.1)
Johnson County, WY	8,600	8,447	(1.8)
Sheridan County, WY	29,738	30,921	4.0
NonMSA Wyoming	404,237	396,384	(1.9)
Wyoming	579,679	576,851	(0.5)
Source: 2020 U.S. Census Bureau: Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- The city of Gillette, WY is the county seat of Campbell County and the most populous city in the AA with approximately 33,278 residents.
- The community member attributes Sheridan County's population growth to the deliberate efforts of the county to diversify industries in the area to create more job opportunities, specifically in the manufacturing industry.

Table 3

Median Family Income Change Assessment Area: Northeast Wyoming			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Northeast Wyoming	86,508	83,626	(3.3)
Campbell County, WY	95,992	87,835	(8.5)
Johnson County, WY	70,308	70,737	0.6
Sheridan County, WY	77,595	83,570	7.7
NonMSA Wyoming	79,576	81,346	2.2
Wyoming	79,970	81,290	1.7
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- The AA's median family income of \$83,626, is 2.9 percent higher than the statewide figure of \$81,290.
- The percentage of families in the AA living below the poverty rate is 7.6 percent, which is slightly higher than the statewide figure of 6.7 percent.

- The community member stated that the Sheridan community has a strong non-profit support network that works to alleviate the cost-of-living burden for LMI residents.

Table 4

Housing Cost Burden Assessment Area: Northeast Wyoming						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Northeast Wyoming	64.8	21.6	36.0	57.1	24.7	17.5
Campbell County, WY	66.8	13.8	36.1	66.8	22.4	16.7
Johnson County, WY	45.2	0.0	28.4	39.8	5.5	12.1
Sheridan County, WY	68.2	31.1	37.7	50.4	31.4	20.6
NonMSA Wyoming	65.8	21.4	34.8	50.9	24.6	16.4
Wyoming	68.7	24.1	36.4	53.9	28.2	17.2
<i>Cost Burden is housing cost that equals 30 percent or more of household income. Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy</i>						

- The AA's median housing value of \$243,575 is 6.8 percent higher than the statewide figure of \$228,000.
- Of the AA's total housing units, 24.7 percent are rental units, which is comparable to the statewide figure of 24.3 percent. Sheridan County has the highest percentage of rental units at 28.6 percent.
- The AA's housing affordability ratio¹ of 28.8 percent is comparable to the statewide figure of 28.6 percent.
- Approximately 36.0 percent of renters in the AA had rent costs greater than 30.0 percent of their income.

Table 5

Unemployment Rates Assessment Area: Northeast Wyoming					
Area	2019	2020	2021	2022	2023
Northeast Wyoming	3.7	6.1	4.8	3.3	2.7
Campbell County, WY	3.8	6.9	5.3	3.4	2.7
Johnson County, WY	3.8	5.6	4.2	3.3	2.8
Sheridan County, WY	3.7	5.0	4.3	3.2	2.7
NonMSA Wyoming	3.7	5.7	4.4	3.3	2.8
Wyoming	3.7	5.9	4.5	3.4	2.9
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i>					

¹ The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

- The largest industries in AA are health care and social assistance, construction, educational services, mining and natural resource extraction, and lastly, agriculture, forestry, fishing, and hunting.
- Top employers in the AA include Peabody Energy, Arch Coal, Campbell County School District, Cloud Peak Energy, and Campbell County Memorial Hospital.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank's overall lending test performance is Satisfactory. This conclusion was based on a more than reasonable NLTD, a majority of loans originated within the bank's AA, as well as excellent geographic distribution of lending and reasonable borrower distribution of lending.

The evaluation assessed small business loans originated in 2023, and home mortgage loans originated since the last evaluation, December 8, 2020 through December 31, 2023. Loan data for 2022 and 2023 were combined and evaluated within the AA, and compared to 2023 demographic data, as there were no significant changes during this portion of the review period. Loan data for 2020 and 2021 were similarly combined and evaluated in comparison to 2021 demographic data (see Appendix C for 2020 and 2021 lending data).

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending considering 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, loan portfolio composition, and geographic proximity.

The bank's NLTD ratio is more than reasonable. As illustrated in Table 6, the bank's 17-quarter NLTD ratio of 84.1 percent is notably higher than similarly situated institutions.

Table 6

Comparative NLTD Ratios September 30, 2020 – September 30, 2024			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			17 Quarter Average
Buffalo Federal Bank	Buffalo, WY	188,406	84.1
Similarly Situated Institutions			
Summit National Bank	Hulett, WY	96,742	54.6
Sundance State Bank	Sundance, WY	251,661	66.4
Big Horn Federal Savings Bank	Greybull, WY	371,064	39.8

Assessment Area Concentration

This performance criterion evaluates the percentage of lending inside and outside of the AA. As illustrated in Table 7, the bank originated a majority of loans, by number and dollar, inside the AA.

Table 7

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Residential Loans	48	73.8	12,798	78.7	17	26.2	3,472	21.3
Small Business	46	92.0	4,906	89.3	4	8.0	586	10.7
Total Loans	94	81.7	17,704	81.4	21	18.3	4,058	18.6

Note: Percentages may not total 100.0 percent due to rounding.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The AA consisted of only middle- and upper-income census tracts in 2020 and 2021, resulting in a geographic distribution analysis being less meaningful for these years, as there are no low- or moderate-income census tracts in the AA for comparative purposes. The bank's geographic distribution of loans reflects excellent distribution among the different census tracts and dispersion throughout the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The bank's lending in moderate-income tracts in 2022 and 2023, at 23.3 percent, was above the demographic figure (percentage of owner-occupied units in the AA) of 14.3 percent.

The bank's distribution of home mortgage lending in 2020 and 2021 in middle- and upper-income tracts was comparable to the demographic figure.

Loan dispersion was also evaluated and no significant gaps or lapses in lending were identified.

Table 8

Distribution of 2022 and 2023 Residential Lending By Income Level of Geography									
Assessment Area: Northeast Wyoming									
Geographic Income Level	Bank Loans By Year								Owner Occupied Units %
	2022				2023				
	#	#%	\$(000)	%	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Moderate	4	18.2	1,030	15.9	3	37.5	362	25.9	14.3
Middle	17	77.3	5,159	79.7	5	62.5	1,033	74.1	71.6
Upper	1	4.5	281	4.3	0	0.0	0	0.0	14.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0	0.0	0	0.0	
Total	22	100.0	6,469	100.0	8	100.0	1,395	100.0	100.0
Source: 2023 FFIEC Census Data									
2016-2020 U.S. Census Bureau: American Community Survey									
Note: Percentages may not total 100.0 percent due to rounding.									

Small Business Lending

The geographic distribution of small business lending is excellent. The bank's lending in moderate-income tracts, at 32.6 percent, was above the demographic figure (percentage of businesses operating in moderate-income tracts) of 10.1 percent.

Loan dispersion was also evaluated and no significant gaps or lapses in lending were identified.

Table 9

Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: Northeast Wyoming					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	15	32.6	2,234	45.5	10.1
Middle	24	52.2	1,801	36.7	86.5
Upper	7	15.2	871	17.8	3.5
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	46	100.0	4,906	100.0	100.0
Source: 2023 FFIEC Census Data					
2023 Dun & Bradstreet Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent 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 distribution amongst individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The bank did not originate any home mortgage loans to low-income borrowers in 2022 or 2023, which is below the demographic figure (percentage of families by family income) of 20.9 percent. Lending to moderate-income borrowers, at 30.0 percent, was above the demographic figure of 16.1 percent.

The bank's performance in 2020 and 2021 was consistent with the performance in 2022 and 2023. In 2020 and 2021, the bank's lending to low-income borrowers, at 11.1 percent, was below the demographic figure of 20.9 percent. Lending to moderate-income borrowers, at 27.8 percent, was above the demographic figure of 16.0 percent.

A review of three-year average HMDA aggregate data (aggregate loan data) for 2021, 2022, and 2023, as reported by originating financial institutions in the AA, was reviewed to ascertain local demand for credit. According to the data, 5.5 percent of loans over the three-year period were originated to area low-income borrowers by number volume, and 16.7 percent of loans over the three-year period were originated to area moderate-income borrowers by number volume. While not a direct comparison to the bank's performance, the aggregate loan data provides a relevant proxy to understand area lending performance considering local conditions and competition that may impact financial institutions originating loans in the AA.

Table 10

Distribution of 2022 and 2023 Residential Lending By Borrower Income Level									
Assessment Area: Northeast Wyoming									
Borrower Income Level	Bank Loans By Year								Families by Family Income %
	2022				2023				
	#	##	\$(000)	\$%	#	##	\$(000)	\$%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	20.9
Moderate	6	27.3	1,176	18.2	3	37.5	385	27.6	16.1
Middle	6	27.3	2,114	32.7	3	37.5	445	31.9	21.8
Upper	10	45.5	3,179	49.1	2	25.0	565	40.5	41.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Total	22	100.0	6,469	100.0	8	100.0	1,395	100.0	100.0
Source: 2023 FFIEC Census Data									
2016-2020 U.S. Census Bureau: American Community Survey									
Note: Percentages may not total 100.0 percent due to rounding.									

Small Business Lending

The borrower distribution of small business lending is reasonable. 84.8 percent of small business loans were made to businesses with revenues of \$1 million or less, which is comparable to the demographic figure (percentage of small businesses operating in the AA). In addition, 71.7 percent of the bank's small business loans were in amounts of \$100,000 or less, which are amounts typically associated with the credit demands of smaller business entities.

Table 11

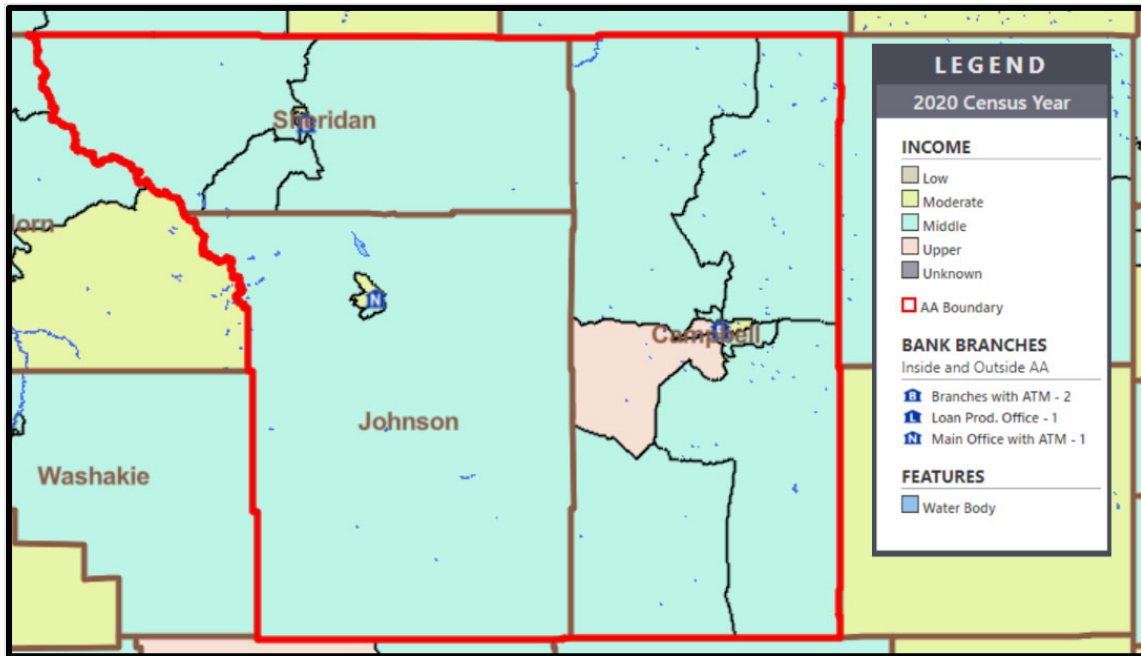
Distribution of 2023 Small Business Lending By Revenue Size of Businesses Assessment Area: Northeast Wyoming					
	Bank Loans				Total
	#	%	\$(000)	%	Businesses %
By Revenue					
\$1 Million or Less	39	84.8	3,668	74.8	93.2
Over \$1 Million	7	15.2	1,238	25.2	3.7
Revenue Unknown	0	0.0	0	0.0	3.1
Total	46	100.0	4,906	100.0	100.0
By Loan Size					
\$100,000 or Less	33	71.7	1,072	21.9	
\$100,001 - \$250,000	6	13.0	991	20.2	
\$250,001 - \$1 Million	7	15.2	2,843	57.9	
Total	46	100.0	4,906	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	29	74.4	850	23.2	
\$100,001 - \$250,000	5	12.8	821	22.4	
\$250,001 - \$1 Million	5	12.8	1,997	54.4	
Total	39	100.0	3,668	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

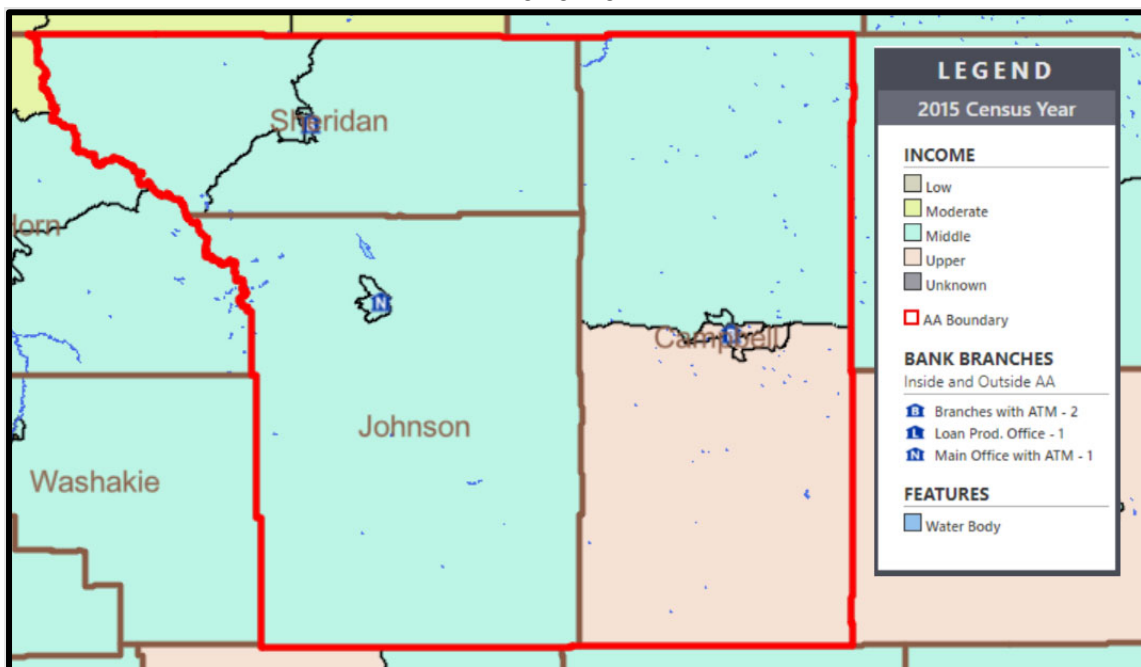
Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – MAP OF THE ASSESSMENT AREA

Map A-1
2022-2023



Map A-2
2020-2021



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2023 Northeast Wyoming AA Demographics								
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	4,815	20.9
Moderate	3	15.0	3,759	16.3	503	13.4	3,713	16.1
Middle	15	75.0	15,958	69.3	1,136	7.1	5,027	21.8
Upper	2	10.0	3,310	14.4	117	3.5	9,472	41.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	20	100.0	23,027	100.0	1,756	7.6	23,027	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	6,475	3,565	14.3	55.1	2,354	36.4	556	8.6
Middle	28,904	17,795	71.6	61.6	6,781	23.5	4,328	15.0
Upper	4,658	3,495	14.1	75.0	771	16.6	392	8.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	40,037	24,855	100.0	62.1	9,906	24.7	5,276	13.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			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	1,171	10.1	1,104	10.2	52	12.0	15	4.2
Middle	10,048	86.5	9,347	86.3	365	84.5	336	94.1
Upper	401	3.5	380	3.5	15	3.5	6	1.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	11,620	100.0	10,831	100.0	432	100.0	357	100.0
Percentage of Total Businesses:				93.2		3.7		3.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			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	10	3.6	10	3.6	0	0.0	0	0.0
Middle	253	91.7	251	91.6	2	100.0	0	0.0
Upper	13	4.7	13	4.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	276	100.0	274	100.0	2	100.0	0	0.0
Percentage of Total Farms:				99.3		0.7		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table B-2

2022 Northeast Wyoming AA Demographics								
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	4,815	20.9
Moderate	3	15.0	3,759	16.3	503	13.4	3,713	16.1
Middle	15	75.0	15,958	69.3	1,136	7.1	5,027	21.8
Upper	2	10.0	3,310	14.4	117	3.5	9,472	41.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	20	100.0	23,027	100.0	1,756	7.6	23,027	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	6,475	3,565	14.3	55.1	2,354	36.4	556	8.6
Middle	28,904	17,795	71.6	61.6	6,781	23.5	4,328	15.0
Upper	4,658	3,495	14.1	75.0	771	16.6	392	8.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	40,037	24,855	100.0	62.1	9,906	24.7	5,276	13.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			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	1,176	12.4	1,106	12.5	53	12.4	17	6.7
Middle	7,956	83.6	7,364	83.4	360	84.1	232	91.0
Upper	384	4.0	363	4.1	15	3.5	6	2.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	9,516	100.0	8,833	100.0	428	100.0	255	100.0
Percentage of Total Businesses:				92.8		4.5		2.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			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	9	3.5	9	3.5	0	0.0	0	0.0
Middle	237	91.9	235	91.8	2	100.0	0	0.0
Upper	12	4.7	12	4.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	258	100.0	256	100.0	2	100.0	0	0.0
Percentage of Total Farms:				99.2		0.8		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table B-3

2021 Northeast Wyoming AA Demographics								
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
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% 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
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			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	6,923	86.0	6,482	86.4	315	77.0	126	93.3
Upper	1,124	14.0	1,021	13.6	94	23.0	9	6.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8,047	100.0	7,503	100.0	409	100.0	135	100.0
Percentage of Total Businesses:				93.2		5.1		1.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			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	220	86.6	218	86.5	2	100.0	0	0.0
Upper	34	13.4	34	13.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	254	100.0	252	100.0	2	100.0	0	0.0
Percentage of Total Farms:				99.2		0.8		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table B-4

2020 Northeast Wyoming AA Demographics								
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
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% 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
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			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	5,396	82.9	4,958	83.1	326	76.7	112	92.6
Upper	1,115	17.1	1,007	16.9	99	23.3	9	7.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6,511	100.0	5,965	100.0	425	100.0	121	100.0
Percentage of Total Businesses:				91.6		6.5		1.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			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	230	87.1	228	87.0	2	100.0	0	0.0
Upper	34	12.9	34	13.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	264	100.0	262	100.0	2	100.0	0	0.0
Percentage of Total Farms:				99.2		0.8		0.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau; American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX C – ADDITIONAL FULL-SCOPE LENDING TABLES

Table C1

Distribution of 2020 and 2021 Residential Lending By Income Level of Geography Assessment Area: Northeast Wyoming									
Geographic Income Level	Bank Loans By Year								Owner Occupied Units %
	2020				2021				
	#	##	\$(000)	%	#	##	\$(000)	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Middle	3	75.0	723	68.5	10	71.4	2,979	76.8	67.3
Upper	1	25.0	332	31.5	4	28.6	900	23.2	32.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0	0.0	0	0.0	
Total	4	100.0	1,055	100.0	14	100.0	3,879	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.									

Table C-2

Distribution of 2020 and 2021 Residential Lending By Borrower Income Level Assessment Area: Northeast Wyoming									
Borrower Income Level	Bank Loans By Year								Families by Family Income %
	2020				2021				
	#	#%	\$(000)	%	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	2	14.3	320	8.2	16.7
Moderate	2	50.0	503	47.7	3	21.4	430	11.1	16.0
Middle	2	50.0	552	52.3	6	42.9	1,462	37.7	22.4
Upper	0	0.0	0	0.0	3	21.4	1,668	43.0	44.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Total	4	100.0	1,055	100.0	14	100.0	3,879	100.0	100.0
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.									

APPENDIX D – 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, 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).

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.

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

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 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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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 Consolidated Reports of Condition and Income (Call Report) instructions. 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.