

“Invest with Peace of Mind”



Buffalo Capital Corporation

4299 MacArthur Blvd
Suite 100
Newport Beach, CA 92660
(949) 476-2799
www.BuffaloCapital.com

Form ADV Part 2A & 2B Brochure

March 14, 2017

This brochure provides information about the qualifications and business practices of Buffalo Capital Corporation. If you have any questions about the contents of this brochure, please contact us at (949) 476-2799. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Buffalo Capital Corporation also is available on the SEC's website at www.adviserinfo.sec.gov.

Buffalo Capital Corporation is a registered investment advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information about which you determine to hire or retain an Advisor.

Buffalo Capital Corporation

Item 2 – Material Changes

The purpose of this page is to inform you of material changes since the previous annual update to the Form ADV Part 2A & 2B brochure.

The Material Changes section of this brochure will be updated at least annually. When material changes to the brochure have occurred since the last annual update a copy of this page will be sent to you.

There are no material changes at this time.

Our complete Form ADV Part 2A & 2B brochure may be requested by contacting our firm by telephone at (949) 476-2799 or by email at: admin@buffalocapital.com.

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Item 4 – Advisory Business

Buffalo Capital Corporation (“Buffalo Capital”) provides portfolio management services to individuals, high net worth individuals, corporate pension, profit-sharing and 401k plans, trusts, estates and charitable institutions.

Our core mission is to preserve and consistently grow our clients’ liquid assets with individualized attention and objective advice. Avoiding large losses is our most important consideration and is reflected in the way all our portfolios are designed and managed.

We seek to minimize overall portfolio volatility and deliver attractive risk-adjusted returns to our clients. To varying degrees, each of our investment strategies attempts to provide some level of downside protection while allowing for upside participation in the market.

Our conservative approach to money management incorporates a tactical asset allocation component in addition to strategic asset allocation. We utilize mutual funds as the primary investment vehicle as they provide flexible and cost effective access to the best managers in building a multi-manager portfolio.

Buffalo Capital Corporation, a California corporation, is a registered investment advisor founded in 1981. The majority owner is the Vieth Family Trust. This trust is controlled by Jeffrey Vieth who is the Chief Executive Officer and Chief Compliance Officer of the firm. Kurt Beimfohr, President, is a minority owner through the Kurt Beimfohr Trust.

As of February 28, 2017 client assets under management totaled \$118,905,170.22. Virtually all of these client assets are managed on a discretionary basis.

Item 4 – Advisory Business (Continued)

Buffalo Capital offers investment advisory services for a fee based on assets under management. We do not bill on an hourly basis, charge subscription fees, participate in wrap fee programs or receive commissions.

Approximately 88% of our fee revenue is for managing investment advisory accounts and providing investment advisory services. Investment advisory services means giving continuous investment advice to a client (making investments for a client) based on the individual needs of the client. Individual needs include, for example, the nature of other client assets and the client's personal and family obligations.

The balance of our fee revenue (approximately 12%) is for managing investment advisory accounts not involving investment advisory services. These accounts are typically clients who are referred to us by outside solicitors.

Since Buffalo Capital obtains full discretion from clients to buy and sell mutual funds and other securities within client accounts, clients may not impose restrictions on investing in certain securities or types of securities.

From time to time we will hold certain securities, such as individual stocks, in a client's account at their specific request. We will not liquidate these positions until the client requests that we do so.

We do not normally provide advice on individual stocks or bonds. On an occasional basis, we furnish advice (such as financial planning advice) to clients on matters not involving securities. We do not charge a fee for this advice.

Item 4 – Advisory Business (Continued)

Principal executive officers, management persons and employees important to the firm's investment strategies are required to have a college degree and experience demonstrating the ability to handle the required duties.

These individuals with their education and business background are as follows:

Jeffrey Vieth, CFP®

Birthdate: 8/17/1943

Education: San Jose State College, San Jose, CA
Bachelor of Arts, History - 1965

University of California, Los Angeles, CA
Master Business Administration - 1968

College for Financial Planning
Certified Financial Planner - "CFP®" - 1979

Member: Financial Planning Association (FPA)
National Association of Active Investment Managers (NAAIM)

Business Background:

Buffalo Capital Corporation - CEO & Founder	1/81 to Present
Titan Value Equities Group, Inc. - Registered Principal	4/83 to 9/96
The Vieth Company - President	2/78 to Present
Investogenic Services, Inc., Registered Representative	5/75 to 5/78
California Insurance License #0446429	9/72 to Present

Item 4 – Advisory Business (Continued)

Kurt Beimfohr

Birthdate: 1/27/1981

Education: Claremont McKenna College, Claremont, CA
Bachelor of Arts, Economics - 2003

University of Virginia Darden School of Business, Charlottesville, VA
Master Business Administration – 2010

Member: National Association of Active Investment Managers (NAAIM)

Business Background:

Buffalo Capital Corporation - President	11/11 to Present
Gurtin Fixed Income Management - Portfolio Management Associate	6/10 to 9/11
Pacific Investment Management Company (PIMCO) - Trade Operations	10/03 to 4/08

Terri L. Sprague

Birthdate: 3/12/1955

Education: Butte Community College, Durham, CA
Associate of Arts, Business - 1978

California State University Chico, Chico, CA
Bachelor of Science, Business Administration, Accounting - 1980

Business Background:

Buffalo Capital Corporation – Director of Operations	2/90 to Present
SDS Investment Advisors - V.P. Account Administrator & Accounting	8/86 to 2/90
F.G. Smathers & Co. - Operations Manager	8/81 to 6/86
Schwarz Kales Accounting - Staff Accountant	1/81 to 8/81

Terrie Sprague is an individual important to the operations of Buffalo Capital. She has over 30 years of experience in back office operations management specific to the investment advisory industry. Terri has client contact but does not formulate investment advice for clients and does not have discretionary authorization over client assets.

Item 5 – Fees and Compensation

Management Fees- Separately Managed Accounts. As compensation for services rendered, Buffalo Capital charges a management fee. Lower fees for comparable services may be available from other sources. The asset-based management fee is determined in accordance with the following blended fee schedule:

- High Income Plan, Managed Income Plan and Personalized Investment Plan

<u>Value of accounts</u>		<u>Annual Fee</u>
First	\$ 250,000	1.75%
Next	750,000	1.50%
Next	1,000,000	1.25%
Next	1,000,000	1.00%
All amounts over	3,000,000	.75%

- Tax Free Municipal Bond Portfolio

<u>Value of accounts</u>	<u>Annual Fee</u>
\$2,000,000 – 5,000,000	0.35%
4,000,000 – 10,000,000	0.25%
Above 10,000,000	0.15%

The management fee is calculated on the sum of all assets under management for each client whether the client has one account or multiple accounts. The fee is computed quarterly and is deemed payable in advance. The fee is payable on the effective date of this agreement prorated to the next billing date. Thereafter, the fee is payable on the first day of each calendar quarter (i.e., January 1, April 1, July 1, and October 1). The fee is refundable on a prorata basis upon receipt of written notice from the client requesting termination of this agreement.

As compensation for sub-advisory portfolio management services to clients of non-affiliated registered investment advisors (RIA) BCC is paid an annual fee by the client. The fee is negotiable and may vary depending on the strategies and services provided. The fee is based on a percentage of each non-affiliated RIA client's assets managed by BCC.

Item 5 – Fees and Compensation (continued)

All mutual funds and variable insurance products charge separate fees (management fees and other operating expenses) as described in their applicable prospectuses. Clients pay their pro-rata share of these fees in addition to those fees charged by Buffalo Capital.

Buffalo Capital utilizes “no transaction fee” mutual funds as well as “transaction fee” mutual funds depending on the portfolio strategy. Exchange Traded Funds (ETFs) are also used. The transaction fees and commissions for these vehicles are charged and retained by the custodian brokerage firm. Buffalo Capital does not participate in any of these fees or commissions.

For special circumstances, the fee structure and/or billing plan may be negotiated between the applicant and the client.

The Investment Advisory Agreement will remain in effect until either party receives written notice of termination. The agreement is not assignable by Buffalo Capital Corporation (“BCC”) without consent of the client. Should there be a change in control of BCC resulting in an assignment of this Agreement, BCC will notify the client and BCC/Successor will continue to provide the services previously provided to the client by BCC. If the client continues to accept such services provided by BCC/Successor without written objection during the 60 day period subsequent to receipt of the written notice from BCC/Successor, BCC/Successor will assume that the client has consented to the assignment and BCC/Successor will become the advisor to the client under the terms and conditions of the Investment Advisory Agreement.

Item 6 – Performance-Based Fees

Currently there are no clients with a performance fee arrangement and there are no plans at this time to enter into performance fee arrangements with any clients.

In the past, Buffalo Capital has entered into performance fee arrangements with qualified clients: such fees are subject to individualized negotiation with each such client. Buffalo Capital will structure any performance or incentive fee arrangement in accordance with the provisions of California Corporations Code Section 260.234.

Item 7 – Types of Clients

Buffalo Capital provides portfolio management services to individuals, high net worth individuals, corporate pension, profit-sharing and 401k plans, trusts, estates and charitable institutions, both as an advisor and as a sub-advisor to clients of non-affiliated registered investment advisors.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

We seek to minimize overall portfolio volatility and deliver attractive risk-adjusted returns to our clients. To varying degrees, each of our investment strategies attempts to provide some level of downside protection while allowing for upside participation in the market. Avoiding large losses is our most important consideration and is reflected in the way all our portfolios are designed and managed.

Our conservative approach to money management incorporates a tactical asset allocation component in addition to strategic asset allocation. We utilize mutual funds as the primary investment vehicle as they provide flexible and cost effective access to the best managers in building a multi-manager portfolio.

Buffalo Capital leverages both fundamental and technical research and analysis in order to make investment decisions. In addition to our own internal research and analysis, we receive research and analysis from external sources including brokerage firms, mutual fund companies and other firms in the financial services industry. Some of this research and analysis is available at no cost and some is purchased by Buffalo Capital.

Buffalo Capital currently offers three different investment plans: High Income Plan (HIP), Managed Income Plan (MIP) and Personalized Investment Plan (PIP). In addition, we offer municipal bond portfolio management for high net worth individuals through a non-affiliated independent registered investment adviser who acts as a sub-adviser to Buffalo Capital.

All investment programs have certain risks that are borne by the investor, including the risk that an investor may lose a part or all of his or her investment. Risk refers to the uncertainty that the actual return the investor realizes could differ from the expected return. Our investment approach constantly keeps the risk of loss in mind. Avoiding large losses is our most important consideration and it is reflected in the way all our portfolios are designed and managed.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss (Continued)

HIGH INCOME PLAN (HIP) **A BOND MARKET MANAGEMENT PROGRAM**

Client Risk Profile:

Very Conservative

Suitability:

For intermediate to long-term investors who seek to avoid loss during every calendar year and outperform the Barclays Aggregate Bond Index, while maintaining 100% liquidity at all times.

Portfolio Objective:

To avoid large losses and provide a positive total return during all calendar years as well as the opportunity for current cash distributions, if desired, by emphasizing fixed income (bonds) with little to no exposure to equities (stocks). This portfolio should experience a low level of downside principal volatility.

Management Style:

Market-driven defensive

Investment Vehicles:

High Income Plan portfolios utilize high yield bond and money market mutual funds. In normal market environments, high yield bond funds typically provide dividend income that is appreciably higher than T-Bills and CD's. Money market mutual funds are considered cash equivalents and accrue dividend income on a daily basis.

Portfolio Management Process:

Buffalo Capital's High Income decision models are designed to signal changes in the direction of high yield bond prices. When our decision models generate a "buy" signal, we move assets from money market funds to high yield bond funds, allowing our clients to benefit from high dividends and participate in potential capital gains due to rising high yield bond prices. When our decision models generate a "sell" signal, we sell the high yield bond funds and move assets into money market funds in order to preserve capital and profit while awaiting the next buying opportunity in the high yield bond market. Not all trades will be profitable. Occasionally "buy" signals are followed by "sell" signals which result in a loss.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss (Continued)

MANAGED INCOME PLAN (MIP) **A BOND MARKET MANAGEMENT PROGRAM**

Client Risk Profile:

Conservative

Suitability:

For intermediate to long-term investors who seek to avoid loss during every calendar year and outperform the Barclays Aggregate Bond Index, while maintaining 100% liquidity at all times.

Portfolio Objective:

To avoid large losses and provide a positive total return during all calendar years as well as the opportunity for current cash distributions, if desired, by emphasizing fixed income (bonds) with little exposure to equities (stocks). This portfolio should experience a relatively low level of downside principal volatility.

Management Style:

Market-driven defensive

Investment Vehicles:

Managed Income Plan portfolios utilize mutual funds and/or exchange traded funds (ETFs) that invest in high yield bonds, floating rate bank loans, preferred securities, municipal bonds, convertible bonds, government bonds and money market instruments.

Portfolio Management Process:

Buffalo Capital's Managed Income decision models are used to signal changes in the direction of high yielding securities. When our decision models generate a "buy" signal, we purchase funds that invest in high yielding securities, allowing our clients to benefit from high dividends and participate in potential capital gains due to rising prices. When our decision models generate a "sell" signal, we sell the high yielding funds and move assets into U.S. Government bond funds or money market funds. Not all trades will be profitable. Occasionally "buy" signals are followed by "sell" signals which result in a loss.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss (Continued)

PERSONALIZED INVESTMENT PLAN **A DIVERSIFIED STOCK & BOND MANAGEMENT PROGRAM**

Client Risk Profile:

Tailored to each client's personal risk profile ranging from very conservative to aggressive.

Suitability:

For long-term investors who seek to outperform U.S. Treasury Bills and Certificates of Deposit (CD's), and increase their wealth at a rate greater than inflation without taking undue risk and maintaining 100% liquidity at all times.

Plan Objective:

To provide a total return as measured by current income and growth of capital through diversification and risk management that is consistent with the client's specific objectives.

Management Style:

Market-driven defensive

Investment Vehicles:

Personalized Investment Plan portfolios utilize stock, bond and money market mutual funds. Stock or equity mutual funds enable investors to be "owners" of corporations. Bond or fixed income mutual funds enable investors to be "lenders" to corporations and the U.S. Government. Generally, stocks provide growth in a portfolio and bonds generate income. Some of the stock funds used have a higher beta or more volatility than the stock market. Some of the stock funds used are designed to increase in value when stock prices decline. Money market mutual funds are considered a cash equivalent and accrue dividend income on a daily basis.

Portfolio Management Process:

Buffalo Capital's Personalized Investment Plan portfolios are tailored to meet each individual client's personal objectives and risk profile. Our more aggressive portfolios will allocate more capital to equity (stock) assets, while our more conservative portfolios will be skewed towards fixed income (bond) assets. The utilization of a balanced approach with wide diversification across asset classes and sectors reduces overall portfolio volatility and risk.

Additionally, these portfolios have the flexibility to invest a percentage of the portfolio's assets tactically, utilizing our High Income and Managed Income decision models to move assets between money market and high yielding mutual funds. Not all trades will be profitable. Occasionally these models generate "buy" signals that are followed by "sell" signals which result in a loss.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss (Continued)

PERSONALIZED INVESTMENT PLAN

A DIVERSIFIED STOCK & BOND MANAGEMENT PROGRAM (Continued)

Portfolio Management Process:

Our portfolio management process is based upon a conservative, market-driven approach that utilizes mutual funds as the primary investment vehicle. Mutual funds provide the most flexible and cost effective access to the best money managers in constructing a multi-manager portfolio. Our management style combines strategic asset allocation with a tactical asset allocation overlay.

Step One: Objective Setting

We seek to obtain a clear understanding of your investment goals based on your expectations and time horizon as well as your ability and willingness to assume risk in order to establish an appropriate portfolio strategy consistent with your investment objectives.

Step Two: Asset Allocation

Our asset allocation process begins with our assessment of the impact of various factors such as economic indicators, monetary policy and political developments on the financial markets. We then implement a portfolio strategy that is consistent with your goals and objectives by deploying assets across equity (stocks), fixed income (bonds) and cash asset classes.

Step 3: Sector Allocation

Sector selection adds further diversification to the portfolio matrix by allocating across a variety of sectors which may or may not include large, mid or small cap, value or growth equity funds, as well as U.S. Government or corporate fixed income funds. Each portfolio consists of a “core position” which trades infrequently, in addition to a “tactical position” which trades a few times each year.

Step 4: Mutual Fund Selection

While we primarily select funds with a demonstrated track record of consistently superior returns, it is critical to look beyond historical performance and understand the unique characteristics of each fund. We routinely conduct internal research and meet face-to-face with fund providers to ensure we have a thorough understanding of manager philosophy and fund investment style.

Step 5: Portfolio Review Process

The portfolio review process consists of the daily monitoring of the stock and bond markets and based on our decision models, the increase, reduction or hedging of the client’s equity and/or fixed income assets consistent with our defensive management style. In addition, sector allocations are changed based upon our forward-looking assessment of investment risks and opportunities within the current economic cycle.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss (Continued)

PERSONALIZED INVESTMENT PLAN

A DIVERSIFIED STOCK & BOND MANAGEMENT PROGRAM (Continued)

Four typical Personalized Investment Plan portfolios and client risk profiles are as follows:

High Income Portfolio

Client Risk Profile – Very Conservative

A portfolio designed to avoid large losses and provide a positive total return during all calendar years, as well as the opportunity for cash distributions, if desired, by emphasizing fixed income (bonds) with little to no exposure to equities (stocks). Pursuit of this objective should result in a low level of downside principal volatility.

Managed Income Portfolio

Client Risk Profile – Conservative

A portfolio designed to avoid large losses and provide a positive total return during all calendar years, as well as the opportunity for cash distributions, if desired, by emphasizing fixed income (bonds) with little to no exposure to equities (stocks). Pursuit of this objective should result in a relatively low level of downside principal volatility.

Capital Preservation Portfolio

Client Risk Profile – Conservative

A portfolio designed to provide a positive total return, the potential for capital appreciation and the opportunity for cash distributions, if desired, by emphasizing fixed income (bonds) over equities (stocks). Pursuit of this objective should experience a relatively low level of downside principal volatility.

Growth & Income Portfolio

Client Risk Profile - Moderate

A portfolio designed to provide long term growth of capital by balancing fixed income (bonds) and equities (stocks). Pursuit of this objective will experience downside principal volatility.

Capital Appreciation

Client Risk Profile – Aggressive

A portfolio designed to provide long term growth of capital by emphasizing equities (stocks) over fixed income (bonds). Pursuit of this objective can result in meaningful downside principal volatility.

Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Buffalo Capital or the integrity of Buffalo Capital's management.

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10 – Other Financial Industry Activities and Affiliations

Buffalo Capital offers investment advisory services for a fee based on assets under management. Buffalo Capital does not bill on an hourly basis, does not charge subscription fees, does not participate in wrap fee programs and does not receive commissions.

The officers and employees of Buffalo Capital purchase and sell mutual funds that are also recommended to clients.

These transactions are generally made at the same time and price as for clients based on Buffalo Capital's decision models, but the officers and employees of Buffalo Capital reserve the right to effect transactions independent of its decision models. In addition, officers and employees of the firm may purchase mutual funds, individual equities, ETF's, individual bonds, options and commodity futures that are not recommended to clients.

Jeffrey Vieth, CEO of Buffalo Capital, has held a State of California Life and Health Insurance license since 1972. Mr. Vieth receives commissions from various insurance companies and agencies for insurance products purchased by individuals. These individuals on a rare occasion may also be clients of Buffalo Capital. These insurance products are neither securities nor investment products and are unrelated to the business activities of Buffalo Capital. As a general practice, Mr. Vieth does not recommend insurance products to clients of Buffalo Capital.

Mr. Vieth is also President and owner of The Vieth Company, a California Corporation, which provides contract office services to individuals and small companies.

Mr. Vieth spends more than 95% of his time committed to business activities on the business of Buffalo Capital.

Item 11 – Code of Ethics

Employees of Buffalo Capital shall not divulge or discuss privileged information regarding its clients with anyone other than the client's solicitor, the custodian of the client's assets if applicable or a fellow employee.

Employees of Buffalo Capital shall not take or have the ability to take possession of client assets.

Employees of Buffalo Capital shall answer all inquiries from clients and solicitors in a timely and courteous manner.

Employees of Buffalo Capital shall follow all rules of the Investment Advisor Act and the rules and regulations of the various states in which we do business.

The officers and employees of Buffalo Capital purchase and sell mutual funds that are also recommended to clients. These transactions are generally made at the same time and price as for clients based on the firm's decision models, but the officers and employees of Buffalo Capital reserve the right to effect transactions independent of its decision models. Since mutual funds are normally priced once each day at the close of the markets, we do not believe these transactions create any conflicts of interest.

Item 12 – Brokerage Practices

Buffalo Capital recommends custodian brokerage firms where mutual funds can be traded for a nominal transaction fee and in some cases no transaction fee. We also recommend custodian brokerage firms where stocks, bonds, options and exchange traded funds (ETFs) can be traded with good execution and competitive commissions. Buffalo Capital does not share in any of these transaction fees or commissions. The custodian brokerage firms provide to Buffalo Capital, at no cost, software which enables us to monitor client accounts efficiently and periodic newsletters dealing with compliance issues. We do not receive referrals from third party custodians (discount brokerage firms).

Buffalo Capital primarily recommends mutual funds. Since mutual funds are normally priced once each day at the close of the markets, all clients receive the same price. Therefore, it is neither possible nor necessary to aggregate orders to purchase and sell mutual funds.

When Buffalo Capital trades ETFs block trades are utilized so that all clients receive the same price.

Item 13 – Review of Accounts

Buffalo Capital manages portfolios through a continuous review process (tactical allocation) plus a regular periodic review process (strategic allocation). These reviews are conducted by an officer of the firm, currently either Jeffrey Vieth (CEO) or Kurt Beimfohr (President).

The continuous review process consists of the daily monitoring of the stock and bond markets, our analysis of the economic climate and the signals provided by tactical decision models. Reviews may result in the increase, reduction or hedging of the clients' equity and/or fixed income assets consistent with our defensive management style.

All accounts are reviewed on a timely basis to verify the accuracy of individual account transactions at the time a transaction is made. These reviews are conducted by administrative personnel under the direct supervision of an officer of Buffalo Capital.

Buffalo Capital sends quarterly update letters to its clients along with quarterly reports and invoices in January, April, July and October. Custodian brokerage firms provide a gain/loss summary (Form 1099) for tax purposes for taxable accounts.

The brokerage firm and/or mutual fund will provide a confirmation directly to the client following each transaction and a monthly and/or quarterly statement which summarizes all activity in the account.

Item 14 – Client Referrals and Other Compensation

Applicant directly compensates Solicitors for client referrals by paying them an amount up to fifty percent of the management fees received by applicant. Client receives a copy of a "Solicitors Agreement" disclosing this compensation and client signs an agreement that he has received and understands this disclosure document. Under this arrangement, the client is not paying a higher management fee to Buffalo Capital than would be the case if there is not a solicitor.

Item 15 – Custody

All client accounts are maintained at independent third party custodians (brokerage firms, mutual fund companies or insurance companies). Buffalo Capital will not have access to the client's funds except that with the client's written authorization, Buffalo Capital will liquidate management fees and service fees directly from the client's account. The account registration is and shall remain in the name the client elects. Client may have multiple accounts, e.g., a joint tenants account plus an IRA account plus a trust account, all controlled by same client.

The client agrees that Buffalo Capital will have full discretion to transfer monies from fund to fund within the account without prior notification. Buffalo Capital will exercise its best judgment in making these transfers.

All investments purchased by Buffalo Capital on behalf of clients have daily liquidity. Upon a client's request, Buffalo Capital will have the custodian send a check payable to the client for all or part of client's investment.

Clients should receive at least quarterly statements from the custodian brokerage firm, insurance company, bank or other qualified custodian that holds and maintains client's investment assets. Buffalo Capital urges clients to carefully review such statements and compare such official custodial records to the account statements that we provide to the client. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Buffalo Capital usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Buffalo Capital observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Buffalo Capital in writing.

Buffalo Capital determines which stock or bond mutual fund and which money market fund the client's money will be invested in. We maintain full discretion to transfer monies from fund to fund within the family of mutual funds, within the brokerage account or within the variable insurance policy without prior notification, and exercise our best judgment in making these transfers.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Buffalo Capital does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios.

The client understands that Buffalo Capital does not, and will not, vote proxies on securities owned by the client. Proxy statements are mailed directly to the client by the custodian so that the client may or may not vote according to the client's desire.

Item 18 – Financial Information

Registered investment advisors are required in this Item to provide you with certain financial information or disclosures about Buffalo Capital's financial condition.

Buffalo Capital has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisors

- A. See Item 4.
- B. See Item 10. All material conflicts of interest under California Corporation Code Section 260.238 (k) which could be reasonably expected to impair the rendering of unbiased and objective advice have been disclosed within this ADV Part 2a.
- C. Not Applicable
- D. Not Applicable
- E. Not Applicable

Item 20 - Privacy Policy and Information Security

Buffalo Capital, a Registered Investment Advisor, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by us. We have never disclosed information to nonaffiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first. As you know, we use financial information that you provide to us to help you meet your financial goals while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below.

- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a custodian brokerage firm in order to execute securities transaction on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.)
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- The categories of nonpublic personal information that we collect from a client depend on the scope of the client engagement. We obtain this information from applications and other forms you submit to us. It will include information about yourself, your personal finances and information about transactions between you and third parties.
- For unaffiliated third parties that require access to your personal information, including financial service companies, brokerage firms, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws. After this required period of retention, all such information will be destroyed.

Jeffrey Vieth
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Form ADV Part 2B
Brochure Supplement

March 14, 2017

This brochure supplement provides information about Jeffrey Vieth that supplements the Buffalo Capital Corporation brochure. You should have received a copy of that brochure. Please contact Jeffrey Vieth if you did not receive Buffalo Capital Corporation's brochure or if you have any questions about the contents of this supplement.

Additional information about Jeffrey Vieth is available on the SEC's website at www.adviserinfo.sec.gov.

Form ADV Part 2B - Brochure Supplements

Education and Business Standards

Principal executive officers, management persons and individuals important to the firm's investment strategies are required to have a college degree and experience demonstrating the ability to handle the required duties.

The CEO of Buffalo Capital has earned a CFP certification and credential that is required to be explained further in detail as follows:

CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10 hours CFP® Certification Exam.
- Three year qualifying full time work experience.
- Successfully pass the Candidate Fitness Standards and background check.
- Ethics- Agree to be bound by CFP Board's Standards of Professional Conduct.

Certified Financial Planner (CFP®): Certified Financial Planners are licensed by the CFP Board to use the CFP mark.

Jeffrey Vieth, CFP®

Birthdate: 8/17/1943

Education: San Jose State College, San Jose, CA
Bachelor of Arts, History - 1965

University of California, Los Angeles, CA
Master Business Administration - 1968

College for Financial Planning
Certified Financial Planner -“CFP®” - 1979

Member: Financial Planning Association (FPA)
National Association of Active Investment Managers (NAAIM)

Business Background:

Buffalo Capital Corporation - CEO & Founder	1/81 to Present
Titan Value Equities Group, Inc.- Registered Principal	4/83 to 9/96
The Vieth Company - President	2/78 to Present
Investogenic Services, Inc., Registered Representative	5/75 to 5/78
California Insurance License #0446429	9/72 to Present

Disciplinary Information

Jeffrey Vieth, CFP® has no legal or disciplinary events that are material to a client’s or prospective client’s evaluation of this advisory business.

Other Business Activities

Jeffrey Vieth, CEO of Buffalo Capital, has held a State of California Life and Health Insurance license since 1972. Mr. Vieth receives commissions from various insurance companies and agencies for insurance products purchased by individuals. These individuals on a rare occasion may also be clients of Buffalo Capital. These insurance products are neither securities nor investment products and are unrelated to the business activities of Buffalo Capital.

Mr. Vieth is also President and owner of The Vieth Company, DBA Swiss Reserve Corporation of America, a California Corporation, which provides contract office services to individuals and small companies.

Mr. Vieth spends more than 95% of his time committed to business activities on the business of Buffalo Capital.

Additional Compensation

Mr. Vieth receives commissions from various insurance companies and agencies for insurance products purchased by individuals. See other business activities above.

Supervision

Jeffrey Vieth, CFP® is the Chief Executive Officer and Chief Compliance Officer of Buffalo Capital and is the supervising authority.

Requirements for State-Registered Advisors

Not applicable

Kurt Beimfohr
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**Form ADV Part 2B
Brochure Supplement**

March 14, 2017

This brochure supplement provides information about Kurt Beimfohr that supplements the Buffalo Capital Corporation brochure. You should have received a copy of that brochure. Please contact Jeffrey Vieth if you did not receive Buffalo Capital Corporation's brochure or if you have any questions about the contents of this supplement.

Additional information about Kurt Beimfohr is available on the SEC's website at www.adviserinfo.sec.gov.

Form ADV Part 2B - Brochure Supplements

Education and Business Standards

Principal executive officers, management persons and individuals important to the firm's investment strategies are required to have a college degree and/or experience demonstrating the ability to handle the required duties.

Kurt Beimfohr

Birthdate: 1/27/1981

Education: Claremont McKenna College, Claremont, CA
Bachelor of Arts, Economics - 2003

University of Virginia Darden School of Business, Charlottesville, VA
Master Business Administration - 2010

Business Background:

Buffalo Capital Corporation – President	11/11 to Present
Gurtin Fixed Income Management - Portfolio Management Associate	6/10 to 9/11
Pacific Investment Management Company (PIMCO) - Trade Operations	10/03 to 4/08

Disciplinary Information

Kurt Beimfohr has no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Other Business Activities

None

Additional Compensation

Kurt Beimfohr receives no additional compensation related to outside business activities.

Supervision

Kurt Beimfohr is supervised by the Chief Executive Officer and Chief Compliance Officer.

Requirements for State-Registered Advisors

Not applicable