



Comptroller of the Currency
Administrator of National Banks

Washington, D.C. 20219

Corporate Decision #99-23 August 1999

Decision Document

DECISION OF THE COMPTROLLER OF THE CURRENCY ON THE APPLICATION TO PURCHASE CERTAIN ASSETS AND ASSUME THE LIABILITIES OF THE "PRATT BRANCH" OF INTRUST BANK, NATIONAL ASSOCIATION, WICHITA, KANSAS BY FIRST NATIONAL BANK IN PRATT, PRATT, KANSAS, UNDER THE CHARTER AND TITLE OF FIRST NATIONAL BANK IN PRATT.

Introduction

On June 25, 1999, application was made to the Comptroller of the Currency for prior authorization to purchase certain assets and assume the liabilities of the "Pratt Branch" of INTRUST Bank, National Association, Wichita, Kansas 67202 (hereinafter "Intrust") by First National Bank in Pratt, Pratt, Kansas 67124 under the charter and title of First National Bank in Pratt (hereinafter "First National Bank"). This application was based on an agreement entered into between the proponents on June 8, 1999.

Participating Financial Institutions

As of 6/30/99, the one office of Intrust subject to the purchase and assumption agreement had total deposits of \$19.2 million. On the same date, First National Bank had total deposits of \$52.3 million. First National Bank is 100 percent owned and controlled by First Pratt Bankshares, Inc., a one-bank holding company.

Competitive Analysis

The relevant geographic market for this proposal is Pratt County, the area from which the Intrust branch to be acquired derives the bulk of its deposits. This is an area with a population of approximately 9,700. The OCC considers an area with such a small population to be economically insignificant from a competitive standpoint. (See decision of the Comptroller of the Currency on the application to merge the

National Bank and Trust Company of Norwich, Norwich, New York, with National Bank of Oxford, Oxford, New York, dated April 8, 1983). Therefore, because the market is not recognized as being economically significant, any anticompetitive effects resulting from this transaction are considered de minimis.

Banking Factors

The Bank Merger Act requires the OCC to consider "...the financial and managerial resources and future prospects of the existing and proposed institutions, and the convenience and needs of the community to be served." We find that the financial and managerial resources of First National Bank and Intrust do not raise concerns that would cause the application to be disapproved. The future prospects of the proponents, individually and combined, are considered favorable. Although the branch office to be acquired will be closed, the facility is across the street from First National Bank's main office. No products or services will be discontinued, and the resulting bank is expected to meet the convenience and needs of the community to be served.

Community Reinvestment Act

A review of the record of this application and other information available to the OCC as a result of its regulatory responsibilities has revealed no evidence that the applicants' records of helping to meet the credit needs of their communities, including low- and moderate-income neighborhoods, is less than satisfactory.

Conclusion

We have analyzed this proposal pursuant to the Bank Merger Act (12 USC 1828(c)) and/or 12 CFR 5.33, and find that it will not lessen significantly competition in any relevant market. Other factors considered in evaluating this proposal are satisfactory. Accordingly, the application is approved.

/s/

Ellen Tanner Shepherd
Licensing Manager

Dated: 08-11-99

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