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Comptroller of the Currency  
Administrator of National Banks

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Central District Office  
One Financial Place, Suite 2700  
440 South LaSalle Street  
Chicago, Illinois 60605  
Decision Document

## **Corporate Decision #2005-04 June 2005**

### **DECISION OF THE COMPTROLLER OF THE CURRENCY ON THE APPLICATION TO MERGE ALLIANCE BANKING COMPANY, NEW BUFFALO, MICHIGAN WITH AND INTO HORIZON BANK, NATIONAL ASSOCIATION, MICHIGAN CITY, INDIANA.**

#### **Introduction**

On March 30, 2005, application was made to the Comptroller of the Currency (“OCC”) for prior authorization to merge Alliance Banking Company, New Buffalo, Michigan with and into Horizon Bank, National Association, Michigan City, Indiana under the charter and the title of Horizon Bank, National Association. This application was based on an agreement entered into between the proponents on February 24, 2005.

#### **Participating Financial Institutions**

As of December 31, 2004, Alliance Banking Company, a state non-member bank, had total deposits of \$114 million and operated four offices. On the same date, Horizon Bank, National Association had total deposits of \$612 million and operated ten offices. Horizon Bank, National Association is 100% owned and controlled by Horizon Bancorp, a one-bank holding company.

#### **Competitive Analysis**

The OCC considered the potential anticompetitive effects of this proposal in light of the reduction in the number of depository and/or lending institutions in the relevant geographic markets. Based upon a competitive review, the OCC finds that the proposed merger will not have a significant anticompetitive effect in the relevant geographic markets. In addition, the OCC considered the Department of Justice Competitive Effects Report, which found no significant anticompetitive effect.

#### **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 Horizon Bank, National Association and Alliance Banking Company do not raise concerns that would cause the application to be disapproved. The future prospects of the proponents, individually and combined, are considered favorable and the resulting bank is expected to meet the convenience and needs of the community to be served as no offices will be closed.

## **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.

signed  
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David J. Rogers  
Director for District Licensing  
Central District Office

Dated: 5-20-2005

Control Number: 2005-CE-02-011