



Comptroller of the Currency
Administrator of National Banks

Licensing Operations

Western District Office
50 Fremont Street, Suite 3900
San Francisco, California 94105-2292

**Corporate Decision #2001-19
August 2001**

DECISION OF THE OFFICE OF THE COMPTROLLER OF THE CURRENCY (OCC) ON THE APPLICATION TO PURCHASE THE ASSETS AND ASSUME THE DEPOSIT LIABILITIES OF THE JULESBURG BRANCH OF BANK OF COLORADO, FORT LUPTON, COLORADO BY FIRST NATIONAL BANK, JULESBURG, COLORADO, UNDER THE CHARTER AND TITLE OF FIRST NATIONAL BANK.

Introduction

On May 30, 2001, application was made to the OCC for prior authorization to purchase the assets and assume the deposit liabilities of the Julesburg Branch of Bank of Colorado, Fort Lupton, Colorado by First National Bank, Julesburg, Colorado, under the charter and title of First National Bank. This application was based on an agreement entered into between the proponents May 24, 2001.

Participating Financial Institutions

As of March 31, 2001, the Julesburg Branch of Bank of Colorado subject to the purchase and assumption agreement had total deposits \$12 million. On the same date, First National Bank had total deposits of \$28 million and operated one office.

Competitive Analysis

The relevant geographic market for this proposal is Sedgwick County, Colorado. This is the area from which First National Bank and Bank of Colorado's Julesburg Branch derive the bulk of their deposits. The county has a population of approximately 2,700. 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, New York, with National Bank of Oxford, Oxford, New York, dated April 8, 1983.) Because the OCC does not recognize the market 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 Bank of Colorado does 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. First National Bank will consolidate Bank of Colorado's Julesburg Branch with their main office in Julesburg. Both offices are

