



Comptroller of the Currency
Administrator of National Banks

Midwestern District Office
2345 Grand Blvd., Suite 700
Kansas City, Missouri 64108-2625

Corporate Decision #97-67 August 1997

DECISION OF THE COMPTROLLER OF THE CURRENCY ON THE APPLICATION TO PURCHASE THE ASSETS AND ASSUME THE LIABILITIES OF THE SEWARD BRANCH OF AMERICAN NATIONAL BANK, NEBRASKA CITY, NEBRASKA, BY THE JONES NATIONAL BANK AND TRUST COMPANY OF SEWARD, SEWARD, NEBRASKA, UNDER THE CHARTER AND TITLE OF THE JONES NATIONAL BANK AND TRUST COMPANY OF SEWARD.

Introduction

On June 4, 1997 application was made to the Comptroller of the Currency for prior authorization to purchase the assets and assume the liabilities of the Seward branch of American National Bank, Nebraska City, Nebraska 68410 (hereinafter "American National") by The Jones National Bank and Trust Company of Seward, Seward, Nebraska 68434 (hereinafter "Jones National") under the charter and title of The Jones National Bank and Trust Company of Seward. This application was based on an agreement entered into between the proponents on May 8, 1997.

As of March 31, 1997 the one office of American National subject to the purchase and assumption agreement had total deposits of \$5.8 million. On the same date, First National had total deposits of \$98.4 million and operated one office. First National is 100 percent owned and controlled by Jones National Corporation, a one-bank holding company.

Competitive Analysis

The relevant geographic market for this proposal is Seward County, Nebraska. Within this market, Jones National competes with five commercial banks and one thrift institution for approximately \$229 million in deposits. Jones National ranks first with \$95.8 million in deposits and approximately forty-two percent of the market's total deposits. American National ranks sixth with \$5.7 million in deposits and approximately two percent of the market's total deposits.

Jones National would remain the largest depository institution in the market with approximately \$102 million in deposits, representing a forty-four percent market share. While the proposed transaction would eliminate some direct competition in the relevant geographic market, any adverse competitive effects would be mitigated by the presence of a number of other banking alternatives in the market.

Therefore, consummation of this proposal would not have a significantly adverse effect on competition in the relevant geographic market.

The Department of Justice has also reviewed the proposal and advised the OCC that consummation of the proposal would not have any significantly adverse competitive effects in the relevant banking market.

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 Jones National and American National do not raise concerns that would cause the application to be disapproved. The future prospects of the proponents, individually and combined, are considered favorable. All branches will remain open and no products or services will be discontinued as a result of the transaction. Therefore, 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 U.S.C. 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: July 9, 1997