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Comptroller of the Currency  
Administrator of National Banks

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**Licensing Operations**

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**Corporate Decision #2004-10**  
**June 2004**

**DECISION OF THE COMPTROLLER OF THE CURRENCY (OCC) ON THE APPLICATION TO MERGE FIRST NATIONAL BANK AND TRUST, ST. JOHN, KANSAS WITH AND INTO AMERICAN STATE BANK & TRUST COMPANY, N.A., GREAT BEND, KANSAS UNDER THE CHARTER AND TITLE OF AMERICAN STATE BANK & TRUST COMPANY, NATIONAL ASSOCIATION.**

**Introduction**

On April 15, 2004, application was made to the OCC for prior authorization to merge First National Bank and Trust, St. John, Kansas with and into American State Bank & Trust Company, N.A., Great Bend, Kansas, under the charter and title of American State Bank & Trust Company, N.A. This application was based on an agreement entered into between the proponents on March 12, 2004.

**Participating Financial Institutions**

As of 12/31/03 First National Bank and Trust had assets of \$50MM and deposits of \$38MM. American State Bank & Trust Company, N.A. had assets of \$106MM and deposits of \$89MM. First United Holding Company owns First National Bank and Trust and American State Bank & Trust Company, N.A. is owned by American State Bancshares, Inc.

**Competitive Analysis**

The relevant geographic market for this proposal is Stafford County, Kansas. This is the area where competition between First National Bank and Trust and American State Bank & Trust, N.A. is direct and immediate. Within this geographic area, American State Bank & Trust, N.A. operates one office in Macksville and First National Bank and Trust operates one office in St. John. Stafford County has a population of 4,662 as of 2002. The OCC considers an area with such a small population to be economically insignificant from a competitive standpoint. (See decision of the OCC on the application to merge National Bank and Trust Company of Norwich, 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

