



**Comptroller of the Currency
Administrator of National Banks**

Licensing Operations
Southwestern District Office
1600 Lincoln Plaza
500 North Akard
Dallas, Texas 75201-3342

**Corporate Decision #2003-5
April 2003**

DECISION OF THE COMPTROLLER OF THE CURRENCY ON THE APPLICATION OF THE CITY NATIONAL BANK AND TRUST COMPANY OF GUYMON, GUYMON, OKLAHOMA (CHARTER NUMBER 9964) TO PURCHASE CERTAIN ASSETS AND ASSUME CERTAIN LIABILITIES OF THE GUYMON, OKLAHOMA BRANCH OF GOLD BANK, HENNESSEY, OKLAHOMA (FDIC CERTIFICATE NUMBER 000413)

DECISION

Introduction

On January 17, 2003, application was made to the Office of the Comptroller of the Currency (OCC), pursuant to the Bank Merger Act, 12 U.S.C. 1828(c), for prior authorization for The City National Bank and Trust Company of Guymon, Guymon, Oklahoma (CNB) to purchase certain assets and assume certain liabilities of the Guymon, Oklahoma branch of Gold Bank, Hennessey, Oklahoma (Gold Bank).

The Financial Institutions Involved

As of September 30, 2002, CNB, located in Guymon, Oklahoma, had total assets of \$90 million and total deposits of \$75 million. On the same date, the target branch of Gold Bank, located in Guymon, Oklahoma, had total assets to be acquired of \$37 million and total deposits to be acquired of \$37 million.

Competitive Analysis

The relevant geographic market for this proposal is Texas County. This is the area where competition between CNB and Gold Bank is direct and immediate. In this area, the resulting and target banks each have an office located in the city of Guymon, OK, on North Main Street. Within Texas County, six banks currently compete for \$284 million in deposits. CNB with \$77 million in deposits in Texas County ranks first with 27.2% market share. Gold Bank ranks fourth with \$44 million in deposits in the county or a 15.3% market share. After consummation of this transaction, the resulting bank would continue to rank first with a 43% deposit market share. The remaining four competitors have deposit market shares of between 20.8% and 5.9%. The competing banks have total assets, including those outside Texas County, ranging from \$47 million to \$8 billion. Accordingly, consummation of this proposal would not have a significantly adverse effect on competition in Texas County due to the presence of other banking alternatives.

Banking Factors

The Bank Merger Act requires this Office 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 both institutions do not raise concerns that would cause the application to be disapproved. The future prospects of the combined entity are considered favorable and the resulting bank is expected to meet the convenience and needs of the community to be served.

The Bank Merger Act requires the OCC to consider, “...the effectiveness of any insured depository institution involved in the proposed merger transaction in combating money laundering activities, including in overseas branches.” We have considered this factor, determined no material weaknesses to preclude approval are present, and conclude that approval of this transaction is appropriate.

Community Reinvestment Act (CRA)

A review of the record of this application and other information available to this Office as a result of its regulatory responsibilities has revealed no evidence that the applicants’ record of helping to meet the credit needs of their communities, including low and moderate income neighborhoods, is less than satisfactory. Gold Bank has not entered into any commitments with community organizations, civic associations or other entities regarding providing banking services to the relevant community.

The newly acquired branch and all other CNB offices will remain open upon consummation of the proposed transaction. No change in community services is planned. Current customers of Gold Bank will continue to be served by CNB upon consummation of the transaction.

Conclusion

We have analyzed this proposal to the Bank Merger Act (12 U.S.C. 1828) and find that it will not significantly lessen competition in the relevant market. Other factors considered in evaluating this proposal are satisfactory. The application is hereby approved.

This approval, and the activities and communications by OCC employees in connection with the filing, do not constitute a contract, express or implied, or any other obligation binding upon the OCC, the U.S., any agency or entity of the U.S., or an officer or employee of the U.S., and do not affect the ability of the OCC to exercise its supervisory, regulatory and examination authorities under applicable law and regulations. The foregoing may not be waived or modified by any employee or agent of the OCC or the U.S.

Karen H. Bryant

3-13-2003

Karen H. Bryant
Licensing Manager

Date