



SMALL BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

PUBLIC DISCLOSURE

March 06, 2006

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**The First National Bank of Gilmer
Charter Number 5288**

**201 North Wood Street
Gilmer, TX 75644**

**Comptroller of the Currency
Longview (NE Texas & NW Louisiana)
1800 West Loop 281, Suite 306
Longview, TX 75604**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory

First National Bank of Gilmer has a satisfactory record of meeting community credit needs. This rating is based on the following:

- ❖ The bank's loan-to-deposit ratio is reasonable when compared to other area banks.
- ❖ A majority of the bank's loans are extended within its assessment area.
- ❖ Credit activity is more than reasonably distributed to borrowers of different income levels.

DESCRIPTION OF INSTITUTION

First National Bank of Gilmer is a \$154 million bank owned by First Gilmer Bancshares, Inc., a bank holding company that is wholly owned by First Gilmer Delaware Limited. Other bank subsidiaries of First Gilmer Bancshares, Inc. include Wood County National Bank, Quitman, Texas and Security State Bank N.A., Ore City, Texas. The main office of First National Bank of Gilmer is located at 201 North Wood, Gilmer, Texas. The bank has three full service branch locations; the main office in Gilmer, a full service branch located in the Wal-Mart Supercenter in Gilmer and a full service branch located at 908 West Broadway in Big Sandy, Texas. Automated teller machines (ATMs) are available in all locations. As of December 31, 2005, loans totaled \$73 million and represented 47% of the bank's total assets. The following chart reflects the distribution of the bank's loan portfolio.

Loan Category	\$ (000)	%
Commercial Real Estate Loans	19,527	26.86%
Commercial Loans	18,736	25.77%
Residential Real Estate Loans	17,796	24.48%
Consumer Loans	16,634	22.89%
Total	72,693	100.00%

There are no legal impediments or other factors that inhibit the bank's ability to meet the credit needs of the community. The bank was rated satisfactory during the prior CRA Examination dated October 15, 2001.

DESCRIPTION OF UPSHUR COUNTY

The Board has designated Upshur County as its assessment area. The designated assessment area is part of the Longview Metropolitan Statistical Area (MSA). The Upshur County assessment area includes the communities of Gilmer, Ore City, Big Sandy, and Gladewater. Each of the census tracts in the designated area has been designated as middle-income. The assessment area meets the requirement of the Community Reinvestment Act and does not arbitrarily exclude low and moderate-income geographies. The following table provides a description of the assessment area based on census data and 2004 Department of Housing and Urban Development (HUD) information.

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF AA	
<i>Population</i>	
Number of Families	9,996
Number of Households	13,296
<i>Geographies</i>	
Number of Census Tracts/BNA	7
% Low-Income Census Tracts/BNA	0%
% Moderate-Income Census Tracts/BNA	100%
% Middle-Income Census Tracts/BNA	0%
% Upper-Income Census Tracts/BNA	0%
<i>Median Family Income (MFI)</i>	
2000 MFI for AA	38,570
2004 HUD-Adjusted MFI	47,300
<i>Economic Indicators</i>	
Unemployment Rate	2.30%
2000 Median Housing Value	56,336
% of Households Below Poverty Level	15.00%

The bank's designated assessment area has a total population of 35,291. The distribution of families by income level, regardless of census tract location, consists of the following: 20.99% are low income, 19.30% are moderate income, 24.81% are middle income, and 34.90% are upper income. Major industries in the assessment area are Upshur Rural Electric, East Tex Telephone, Rob Roy Industries and Gilmer Potteries. Competition within the area is moderate with several financial institutions. The local economy is considered stable with an unemployment rate of 2.30%.

Contacts with a local Realtor and the local Chamber of Commerce revealed that primary community credit needs for the area are residential mortgages and consumer loans.

CONCLUSIONS ABOUT PERFORMANCE CRITERIA

Loan-to-Deposit Ratio

The loan-to-deposit ratio of FNB is reasonable given the bank's size, financial condition and the credit needs of the assessment area. The bank's quarterly average loan-to-deposit ratio was 60.65% since the prior CRA Examination in October of 2001. The average loan-to-deposit ratio of banks within the assessment area for the same time period was 58.16%.

Institution	Assets (000s) (as of 12/31/05)	Average LTD Ratio
Gilmer National Bank	181,250	53.95%
Security State Bank, Ore City	42,074	59.87%
<i>First National Bank</i>	<i>153,552</i>	<i>60.65%</i>

Lending in Assessment Area

A majority of the bank's lending activity is located within its assessment area. Bank management maintains a CRA database for the loan portfolio, which allowed a review of all loans granted since the previous Examination. We reviewed 8,441 consumer loans, 1,383 commercial loans, and 251 residential loans. This sample reflected that approximately 67% of the number of loans and 57% of the dollar amount of loans in our sample were extended within the bank's assessment area. The breakdown by loan category is illustrated in the following table.

TOTAL LOANS REVIEWED								
LOAN TYPE	IN ASSESSMENT AREA				OUT OF ASSESSMENT AREA			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
Consumer	5,700	67.53%	35,742	61.03%	2,741	32.47%	22,821	38.97%
Commercial	877	63.41%	21,633	46.52%	506	36.59%	24,865	53.48%
Residential	196	78.09%	10,862	76.37%	55	21.91%	3,361	23.63%
Total Reviewed	6,773	67.23%	68,237	57.21%	3,302	32.77%	51,047	42.79%

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The distribution of loans within the assessment area reflects a good penetration among borrowers of different income levels and businesses of different sizes. First National Bank's primary product lines are commercial, residential mortgages, and consumer loans. Our sample of loans inside the assessment area included 5,700 consumer loans and 196 1-4 family residential loans. The distribution of these loan products approximates or exceeds the income characteristics of the assessment area. Most notable is the bank's loan penetration among low-and-moderate income individuals, which generally exceeds the demographics.

RESIDENTIAL REAL ESTATE								
Borrower Income Level	LOW		MODERATE		MIDDLE		UPPER	
% of AA Families ¹	20.99%		19.30%		24.81%		34.90%	
	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount
	13.78%	5.85%	32.65%	24.15%	27.04%	32.18%	26.53%	37.82%

CONSUMER								
Borrower Income Level	LOW		MODERATE		MIDDLE		UPPER	
% of AA Households ²	24.77%		15.96%		19.77%		39.50%	
	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount
	44.14%	26.50%	29.19%	27.62%	11.96%	16.08%	14.71%	29.80

The distribution of business loans reflects a reasonable penetration among businesses of different sizes. The bank's database of business information for CRA purposes did not include revenue information; therefore, we specifically sampled 20 business loans originating within the assessment area. Based on U.S. Census information, there are 1,143 business that reported revenues less than \$1 million and 50 businesses reporting revenues in excess of \$1 million.

BORROWER DISTRIBUTION OF SMALL LOANS TO BUSINESSES		
Business Revenues	≤\$1,000,000	>\$1,000,000
% of AA Businesses ³	95.81%	4.19%
% of Bank Loans in AA #	60.00%	40.00%

Responses to Complaints

Management has not received any written complaints related to CRA performance since the prior CRA examination.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of illegal discrimination or any other illegal credit practices.