



Comptroller of the Currency Administrator of National Banks

Washington, DC 20219

# **PUBLIC DISCLOSURE**

September 25, 2008

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank Charter Number 9354

5499 Summerhill Road Texarkana, TX 75503-0000

Office of the Comptroller of the Currency

LITTLE ROCK (MEMPHIS)
10201 West Markham, Suite 105 Ozark National Life Bld.
Little Rock, AR 72205-2180

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.

Charter Number: 9354

#### **INSTITUTION'S CRA RATING:** This institution is rated Satisfactory.

**CRA** performance in the Texarkana Texas Arkansas MSA is rated Satisfactory.

CRA performance in the Hempstead-Lafayette County Arkansas Assessment Area (AA) is rated Satisfactory.

- The average loan-to-deposit ratio at 69% is reasonable given the bank's size, financial condition, and AA credit needs.
- A majority of the number and dollar volume of loans originated by First National Bank (FNB) are in the bank's AA.
- The distribution of loans reflects reasonable penetration among individuals of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects reasonable dispersion throughout the AA.

#### **SCOPE OF EXAMINATION**

The bank was evaluated using Small Bank CRA criteria. The bank is located in the Texarkana Metropolitan Statistical Area (MSA), and became a Home Mortgage Disclosure Act reporter December 21, 2007. Loan information used for this evaluation included samples of residential, automobile, business/commercial, and agriculture loans made from January 1, 2007 through June 30, 2008.

#### **DESCRIPTION OF INSTITUTION**

First National Bank (FNB) is located in Texarkana, Texas. FNB is the result of the mergers of The First National Bank of Hope, and Bank of Blevins into FNB. FNB has full service banking offices in Texarkana, Texas and Hope, Lewisville and Blevins, Arkansas and two paying/receiving branches in Hope. The bank is 100% owned by First National Bancshares of Hempstead County, Hope, Arkansas. As of June 30, 2008, FNB reported total assets of \$203 million, total deposits of \$166 million, and net loans of \$158 million (78% of total assets).

FNB offers convenient banking hours and a variety of traditional loan and deposit products to meet the needs of the AA. The bank's primary lending activity is residential real estate, commercial real estate, consumer, commercial, and agriculture. Over 50% of FNB's loans are in 1 - 4 family residential and consumer loans. There are no financial impediments that would limit the bank's ability to meet the credit needs in its AA.

The bank's last CRA examination was performed by the OCC as of February 3, 2003, and was rated **Satisfactory**.

The loan portfolio composition as of June 30, 2008, is as follows:

Loan Portfolio Composition as of June 30, 2008						
Loan Type	Dollar Amount	Percent of Total				
	(000's)	Loans				
Construction and Land						
Development	8,546	5.37%				
Secured by Farmland	10,471	6.58%				
One-to-Four Family Residential	67,784	42.59%				
Commercial Real Estate	34,238	21.52%				
Total Real Estate Loans	121,039	76.06%				
Agricultural	4,546	2.86%				
Commercial and Industrial	11,725	7.37%				
Consumer	20,502	12.89%				
Other	1,299	0.82%				
Total Loans	159,111	100.00%				

Source: Report of Condition

# **DESCRIPTION OF ASSESSMENT AREA(S)**

FNB's AA is a contiguous area that includes the following census tracts (CTs) - 9801, 9802, 9803, 9804, and 9805 in Hempstead County, Arkansas; CTs 9701 and 9702 in Lafayette County, Arkansas; CTs 201, 202, 207, and 209 in Miller County, Arkansas; and CTs 101, 106, 107, 108, 109.01, 109.02, 110, and 112 in Bowie County, Texas. The AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income geographies.

The CTs in Miller and Bowie County are part of the Texarkana Texas Arkansas Metropolitan Statistical Area (MSA), adjoining Interstate Highway 30. This group of CTs also adjoins Hempstead and Lafayette Counties. There are a total of 19 CTs in the AA. One CT (106 in Bowie County) is a low- income CT; two CTs (108 in Bowie County and 9805 in Hempstead County) are moderate-income CTs; and three CTs (207 in Miller County and 109.01 and 112 in Bowie County) are upper-income CTs. The remaining 13 CTs in the AA are all middle-income CTs. The portions of FNB's AA located in the Texarkana Texas Arkansas MSA and those in Hempstead and Lafayette County are described separately below.

#### **Texarkana Texas Arkansas MSA**

Texarkana, Texas and Texarkana, Arkansas comprise the Texarkana MSA, which is located in southwest Arkansas and northeast Texas. The following table shows the demographic and economic characteristics of the AA.

Demographic and Economic Characteristics of the Texarkana MSA							
Demographic Characteristics	# Total	Low	Moderate	Middle	Upper	N/A*	
		% of #	% of #	% of #	% of #	% of #	
Geographies (Census Tracts)	12	8.33%	8.33%	41.66%	25.00%	0.00%	
Population by Geography	60,713	4.32%	7.41%	58.75%	29.52%	0.00%	
Owner-Occupied Housing by	16,104	2.74%	5.03%	59.90%	32.33%	0.00%	
Geography							
Businesses by Geography	5,745	2.49%	10.08%	54.39%	33.04%	0.00%	
Farms by Geography	140	1.43%	12.86%	54.29%	31.42%	0.00%	
Family distribution by Income	16,934	20.35%	14.79%	17.50%	47.36%	0.00%	
Level							
Household distribution by Income	24,266	22.94%	14.33%	15.94%	46.79%	0.00%	
Level							
Household Distribution by Income							
Level of the Geography	24,266	3.56%	8.37%	59.32%	28.75%	0.00%	
Median Family Income, 2000 Censu	IS	\$39,684	Median Housing Value			\$70,196	
			(as of 200				
HUD Adjusted Median Family Incom	ne for	\$51,700	Unemployr				
2007			June 2008				
		12.18%	USA Texas			5.8%	
Households Below Poverty Level	Households Below Poverty Level					5.0%	
		Texarkana		<u> </u>	7.9%		
% Businesses with Revenues < \$1 i	59.06%	% Farms with Revenues < \$1			97.14%		
			million				
% Businesses with Revenues > \$1 i	3.88%	% Farms w	vith Reven	ues > \$1	2.14%		
			million				

Source: 2000 U.S. Census data; 2007 HUD updated income data; Dun and Bradstreet; Bureau of Labor Standards. \* the N/A category consists of geographies that have not been assigned an income classification.

The economy of the MSA is considered one of the fastest growing small metropolitan areas in the country. Texarkana is a major transportation hub being centrally located in between Dallas-Ft. Worth, Little Rock-North Little Rock, Shreveport-Bossier City, Northwest Arkansas, and Houston. The leading industries in Texarkana, Arkansas are educational, health and social services, manufacturing, and retail trade.

#### **Hempstead-Lafayette County AA**

The Hempstead and Lafayette Counties are located in southwest Arkansas, adjoining Miller County which is part of the Texarkana MSA. The following table shows the demographic and economic characteristics of the AA.

Demographic and Economic Characteristics of the Hempstead-Lafayette County AA							
Demographic Characteristics	# Total	Low	Moderate	Middle	Upper	N/A*	
		% of #	% of #	% of #	% of #	% of #	
Geographies (Census Tracts)	7	0.00%	14.29%	85.71%	0.00%	0.00%	
Population by Geography	32,146	0.00%	14.69%	85.31%	0.00%	0.00%	
Owner-Occupied Housing by Geography	8,903	0.00%	9.57%	90.43%	0.00%	0.00%	
Businesses by Geography	3,087	0.00%	15.39%	84.61%	0.00%	0.00%	
Farms by Geography	152	0.00%	5.92%	94.08%	0.00%	0.00%	
Family distribution by Income Level	8,759	23.15%	18.13%	19.26%	39.46%	0.00%	
Household Distribution by Income Level	12,369	27.37%	14.87%	17.61%	40.15%	0.00%	
Household Distribution by Income Level of the Geography	12,369	0.00%	13.36%	86.64%	0.00%	0.00%	
Median Family Income, 2000 Censu	IS	\$34,263	Median Housing Value (as of 2000)			\$44,642	
HUD Adjusted Median Family Incom 2007	ne for	\$42,000	Unemployr June 2008	Unemployment Rate			
Households Below Poverty Level	16.71%	USA Arkansas Hempstead			5.0% 4.9% 6.6%		
		Counties					
% Businesses with Revenues < \$1 i	40.33%	% Farms with Revenues < \$1 million			95.39%		
% Businesses with Revenues > \$1 i	million	1.91%	% Farms w million	vith Reven	ues > \$1	1.32%	

Source: 2000 U.S. Census data; 2007 HUD updated income data; Dun and Bradstreet; Bureau of Labor Standards.

The economy of Hempstead and Lafayette counties is considered to be stable with modest growth. This AA is located in southwest Arkansas, adjoining the Texarkana Texas Arkansas MSA. The leading industries in the Hempstead-Lafayette County AA include manufacturing, education, healthcare, and transportation, and state and local government.

A community contact with the Executive Director of the Hope, Arkansas Chamber of Commerce was conducted in conjunction with this CRA examination. This contact revealed that local banks are meeting the primary credit needs in the area.

<sup>\*</sup> the N/A category consists of geographies that have not been assigned an income classification.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

FNB's overall lending performance is satisfactory. Lending performance in the Texarkana Texas Arkansas MSA and the Hempstead-Lafayette County AA is satisfactory. FNB's loan to deposit ratio is reasonable and the majority of the number and dollar volume of their loans are within the AA. The distribution of loans reflects adequate to distribution to lowand moderate-income borrowers, small businesses, and farms. The geographic distribution of FNB's loans reflects adequate distribution in low- and moderate-income geographies.

### Loan-to-Deposit Ratio

FNB's loan-to-deposit ratio is reasonable given the bank's size, financial condition, and AA. There are 18 banks with branches in FNB's AA. However, only three other banks of similar size are headquartered in the AA and considered similarly situated. These banks are Commercial National Bank of Texarkana, Texarkana, Texas, Bodcaw Bank, Stamps, Arkansas, State Bank of De Kalb, De Kalb, Texas.

FNB has 7.27% of the deposit market share based on the June 30, 2008 FDIC Deposit Market Share Report, ranking fifth. Commercial National Bank of Texarkana had 6.64% of the deposit market share ranking 6th. Bodcaw Bank had 2.73% of the deposit market share ranking 8th. The State Bank of De Kalb had 2.26% of the deposit market share ranking 10th.

The following table shows total assets as of June 30, 2008 and the quarterly average loan-to-deposit ratio from March 31, 2004 through June 30, 2008 (18 quarters) for these four banks.

Loan-to-Deposit Ratios						
	Assets (as of	Average LTD				
Institution	06-30-2008)	Ratio				
Commercial National Bank of	\$165 million	78%				
Texarkana, Texarkana, TX						
FNB, Texarkana, TX	\$203 million	69%				
State Bank of De Kalb, De	\$118 million	58%				
Kalb, TX						
Bodcaw Bank, Stamps, AR	\$69 million	38%				

Source: Institution Reports of Condition.

## **Lending in Assessment Area**

The majority of the number and dollar volume of FNB's loans are within the bank's AA. A sample of 50 residential real estate loans, 50 automobile loans, 50 business/commercial loans, and 37 agriculture loans FNB originated from January 1, 2007 through June 30, 2008 were reviewed to assess lending performance within the AA. The results of this review are detailed in the following table.

				Lending	g in the	AA				
		Numb	er of L	oans			Dolla	rs of Loar	ns (000)	
	Ins	ide	Ou	tside	Total	Insi	ide	Outs	side	Total \$
Loan Type	#	%	#	%	#	\$	%	\$	%	
Residential Loans Texarkana MSA	17	68%	8	32%	25	\$1,477	71%	\$609	29%	\$2,086
Residential Loans Hempstead Lafayette County AA	23	92%	2	8%	25	\$738	78%	\$203	22%	\$941
Total Residential Loans	40	80%	10	20%	50	\$2,215	73%	812\$	27%	\$3,027
Automobile Loans Texarkana MSA	18	72%	7	28%	25	\$205	79%	\$56	21%	\$261
Automobile Loans Hempstead Lafayette County AA	19	76%	6	24%	25	\$134	71%	\$54	29%	\$188
Total Automobile	37	74%	13	26%	50	\$339	76%	\$110	24%	\$449
Loans										
Business Loans Texarkana MSA	19	76%	6	24%	25	\$3,007	62%	\$1,828	38%	\$4,835
Business Loans Hempstead Lafayette County AA	22	88%	3	12%	25	\$2,727	97%	\$97	3%	\$2,824
Total Business Loans	41	82%	9	18%	50	\$5,734	75%	\$1,925	25%	\$7,659
Agriculture Loans Texarkana MSA	8	67%	4	33%	12	\$770	82%	\$170	18%	\$940
Agriculture Loans Hempstead Lafayette County AA	24	96%	1	4%	25	\$1,708	100%	\$4	0%	\$1,712
Total Agriculture Loans	32	86%	5	14%	37	\$2,478	93%	\$174	7%	\$2,652
Totals	150	80%	37	20%	187	\$10,766	78%	\$3,012	22%	\$13,787

Source: sample of loans used for CRA performance analysis.

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

FNB's distribution of loans to borrowers, businesses, and farms of different income levels is satisfactory. The loan samples previously described to determine FNB's lending performance within the AA were also used to determine FNB's lending performance to borrowers, businesses, and farms of different income levels from January 1, 2007 through June 30, 2008.

The following table shows the distribution of 25 residential real estate loans within the Texarkana MSA, to borrowers of various income levels.

Borrower	Borrower Distribution of Residential Real Estate Loans in the Texarkana Texas							
			Arka	nsas MSA	١			
Borrower Income Level	Lo	W	Mod	erate	Mic	ldle	Up	per
% of AA Families	20.3	5%	14.	79%	17.5	50%	47.3	36%
	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount
FNB's Loans from 1-1-2007 to 6-30-2008	4.00%	0.10%	24.00%	15.34%	8.00%	4.22%	32.00%	80.34%

Source: Loan sample and U.S. Census data.

The table above shows that the number and dollar volume of residential real estate loans to low-income borrowers was below the percentage of low-income families in the AA. However, the number and dollar volume of residential real estate loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA.

The following table shows the distribution of 25 residential real estate loans within the Hempstead and Lafayette County AA, to borrowers of various income levels.

Borrower Di	Borrower Distribution of Residential Real Estate Loans in the Hempstead-Lafayette							
			Co	unty AA				
Borrower	Lo	W	Mod	erate	Mic	ldle	Up	per
Income Level								
% of AA	23.1	5%	18.	13%	19.2	26%	39.4	46%
Families								
	% of	% of	% of	% of	% of	% of	% of	% of
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
FNB's Loans	24.00%	29.22%	16.00%	14.35%	32.00%	26.04%	28.00%	30.39%
from 1-1-2007								
to 6-30-2008								

Source: Loan sample and U.S. Census data.

The table above shows that the number of residential real estate loans to low- and moderate- income borrowers was near the percentage of low- and moderate-income families in the AA. The dollar volume of residential real estate loans to low-income borrowers exceeded the percentage of low-income families in the AA and, the dollar volume of residential real estate loans to moderate-income borrowers was below the percentage of moderate-income families in the AA.

The following table shows the distribution of 25 automobile loans within the Texarkana MSA, to borrowers of various income levels.

Borrower Distribution of Automobile Loans in the Texarkana Texas Arkansas MSA								
Borrower	Low		Moderate		Middle		Upper	
Income Level								
% of AA	22.9	4%	14.	33%	15.94%		46.	79%
Households								
	% of	% of	% of	% of	% of	% of	% of	% of
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
FNB's Loans	28.00%	23.37%	28.00%	29.50%	20.00%	25.67%	24.00%	21.46%
from 1-1-2007								
to 6-30-2008								

Source: Loan sample and U.S. Census data.

The table above shows that the number and dollar volume of automobile loans to low- and moderate- income borrowers exceeded the percentage of low- and moderate-income families in the AA.

The following table shows the distribution of 25 automobile loans within the Hempstead and Lafayette County AA, to borrowers of various income levels.

Borrower Distribution of Automobile Loans in the Hempstead-Lafayette County AA									
Borrower	Low		Moderate		Middle		Upper		
Income Level									
% of AA	27.3	27.37%		87%	17.61%		40.	15%	
Households									
	% of	% of	% of	% of	% of	% of	% of	% of	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount	
FNB's Loans	40.00%	43.62%	32.00%	38.83%	16.00%	5.85%	12.00%	11.70%	
from 1-1-2007									
to 6-30-2008									

Source: Loan sample and U.S. Census data.

The table above shows that the number and dollar volume of automobile loans to low- and moderate- income borrowers exceeded the percentage of low- and moderate-income families in the AA.

The following table shows the distribution of 25 loans within the Texarkana MSA, to businesses of various income levels.

Borrower Distribution of Loans to Businesses in the Texarkana Texas Arkansas						
MSA						
Business Revenues(or Sales)	≤\$1,000,000	>\$1,000,000	Revenues not known			
% of AA Businesses	59.06%	3.88%	37.06%			
% of FNB's Loans in AA by # 24.00% 76.00% 0.00%						
% of FNB's Loans in AA by \$	62.19%	37.81%	0.00%			

Source: Loan sample and Dun and Bradstreet data

The table above shows the distribution of the number of loans to businesses with revenues under \$1,000,000 is less than the percentage of businesses with revenues under \$1,000,000 in the AA. However, the dollar volume of loans to businesses with revenues under \$1,000,000 exceeds the percentage of businesses with revenues under \$1,000,000 in the AA.

The following table shows the distribution of 25 loans within the Hempstead and Lafayette County AA, to businesses of various income levels.

Borrower Distribution of Loans to Businesses in the Hempstead-Lafayette County AA							
Business Revenues(or Sales) ≤\$1,000,000 >\$1,000,000 Revenues not known							
% of AA Businesses	40.33%	1.91%	57.76%				
% of FNB's Loans in AA by # 88.00% 12.00% 0.00%							
% of FNB's Loans in AA by \$	78.08%	21.92%	0.00%				

Source: Loan sample and Dun and Bradstreet data

The table above shows the distribution of the number and dollar volume of loans to businesses with revenues under \$1,000,000 exceeds the percentage of businesses with revenues under \$1,000,000 in the AA.

The following table shows the distribution of 12 loans within the Texarkana MSA, to farms of various income levels.

Borrower Distribution of Loans to Farms in the Texarkana Texas Arkansas MSA							
Business Revenues(or Sales)	≤\$1,000,000	>\$1,000,000	Revenues not known				
% of AA Farms	97.14%	2.14%	0.72%				
% of FNB's Loans in AA by #	100.00%	0.00%	0.00%				
% of FNB's Loans in AA by \$	100.00%	0.00%	0.00%				

Source: Loan sample and Dun and Bradstreet data

The table above shows the distribution of the number and dollar volume of loans to businesses with revenues under \$1,000,000 exceeds the percentage of businesses with revenues under \$1,000,000 in the AA.

The following table shows the distribution of 25 loans within the Hempstead and Lafayette County AA, to farms of various income levels.

Borrower Distribution of Loans to Farms in the Hempstead-Lafayette County AA										
Business Revenues(or Sales)	≤\$1,000,000	>\$1,000,000	Revenues not known							
% of AA Farms	95.39%	1.32%	3.29%							
% of FNB's Loans in AA by #	100.00%	0.00%	0.00%							
% of FNB's Loans in AA by \$	100.00%	0.00%	0.00%							

Source: Loan sample and Dun and Bradstreet data

The table above shows the distribution of the number and dollar volume of loans to farms with revenues under \$1,000,000 exceeds the percentage of businesses with revenues under \$1,000,000 in the AA.

## **Geographic Distribution of Loans**

The geographic distribution of loans in the AA is satisfactory. The loan samples previously described to determine FNB's lending performance within the AA were also used to assess FNB's lending performance throughout the AA, including low- and moderate-income CTs. FNB's distribution of loans made from January 1, 2007 through June 30, 2008 reflects a reasonable dispersion throughout the AA.

The following table shows the geographic distribution of 25 residential real estate loans within the Texarkana MSA.

Geographic Distribution of Residential Real Estate Loans in the Texarkana Texas Arkansas MSA												
Census Tract Income Level	Lo	)W	Mode	erate	Mic	ldle	Up	per				
%of AA Owner Occupied Housing	2.7	2.74%		5.03%		59.90%		32.33%				
	% of Number	% of Amount										
FNB's Loans from 1-1-2007 to 6-30-2008	0.00%	0.00%	0.00%	0.00%	88.24%	92.28%	11.76%	7.72%				

Source: Loan sample and U.S. Census data.

The table above shows that the number and dollar volume of residential real estate loans in low- and moderate-income CTs is below the percentage of low- and moderate-income CTs in the AA.

The following table shows the geographic distribution of 25 residential real estate loans within the Hempstead and Lafayette County AA.

Geographic Dist	Geographic Distribution of Residential Real Estate Loans in the Hempstead-Lafayette										
County AA											
Census Tract Income Level	Lo	)W	Mod	erate	Mic	ldle	Up	per			
%of AA Owner Occupied Housing	0.0	0.00%		9.57%		90.43%		0.00%			
	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of	% of Number	% of Amount			
FNB's Loans from 1-1-2007 to 6-30-2008	NA	NA	17.39%	12.87%	82.61%	87.13%	NA	NA			

Source: Loan sample and U.S. Census data.

The table above shows that the number and dollar volume of residential real estate loans in moderate-income CTs exceeds the percentage of moderate-income CTs in the AA.

The following table shows the geographic distribution of 25 automobile loans within the Texarkana MSA.

Geographic Distribution of Automobile Loans in the Texarkana Texas Arkansas MSA											
Census Tract	Lo	Low		Moderate		Middle		Upper			
Income Level											
% of AA											
Households	3.5	3.56%		8.37%		59.32%		28.75%			
	% of	% of % of		% of	% of	% of	% of	% of			
	Number	Amount	Number	Amount	Number	Amount	Number	Amount			
FNB's Loans	0.00%	0.00%	0.00%	0.00%	61.11%	65.61%	38.89%	24.39%			
from 1-1-2007 to											
6-30-2008											

Source: Loan sample and U.S. Census data.

The table above shows that the number and dollar volume of automobile loans in low-and moderate-income CTs is below the percentage of low-income CTs in the AA.

The following table shows the geographic distribution of 25 automobile loans within the Hempstead and Lafayette County AA.

Geographic Distribution of Automobile Loans in the Hempstead-Lafayette County AA											
Census Tract	Lo	Low		Moderate		Middle		Upper			
Income Level											
% of AA											
Households	0.0	0.00%		13.36%		86.64%		0.00%			
	% of	% of	% of	% of	% of	% of	% of	% of			
	Number	Amount	Number	Amount	Number	Amount	Number	Amount			
FNB's Loans	NA	NA	10.53%	7.46%	89.47%	92.54%	NA	NA			
from 1-1-2007 to											
6-30-2008											

Source: Loan sample and U.S. Census data.

The table above shows that the number and dollar volume of automobile loans in low-and moderate-income CTs is below the percentage of low-income CTs in the AA.

The following table shows the geographic distribution of 25 loans to businesses within the Texarkana MSA.

Geographic Distribution of Loans to Businesses in the Texarkana Texas Arkansas  MSA												
Census Tract Income Level	Lo	ow	Mode	erate	Mic	ldle	Up	per				
% of AA Businesses	2.49%		10.08%		54.39%		33.04%					
	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount				
FNB's Loans from 1-1-2007 to 6-30-2008	0.00%	0.00%	0.00%	0.00%	61.54%	44.23%	38.46%	55.77%				

Source: Loan sample and U.S. Census data.

The table above shows that the number and dollar volume of business loans in low- and moderate-income CTs is below the percentage of low- and moderate-income CTs in the AA.

The following table shows the geographic distribution of 25 loans to businesses within the Hempstead and Lafayette County AA.

Geographic Di	Geographic Distribution of Loans to Businesses in the Hempstead-Lafayette County												
AA													
Census Tract	Lo	Low		Moderate		Middle		Upper					
Income Level													
	0.0	0.00%		15.39%		84.61%		%0					
% of AA													
Businesses													
	% of	% of	% of	% of	% of	% of	% of	% of					
	Number	Amount	Number	Amount	Number	Amount	Number	Amount					
FNB's Loans	NA	NA	10.53%	7.46%	89.47%	92.54%	NA	NA					
from 1-1-2007 to													
6-30-2008													

Source: Loan sample and U.S. Census data.

The table above shows that the number and dollar volume of business loans in moderate-income CTs is below the percentage of moderate-income CTs in the AA.

The following table shows the geographic distribution of 12 loans to farms within the Texarkana MSA.

Geographic D	Geographic Distribution of Loans to Farms in the Texarkana Texas Arkansas MSA											
Census Tract	Low		Moderate		Middle		Upper					
Income Level												
	1.4	1.43%		12.86%		54.29%		31.42%				
% of AA Farms												
	% of	% of	% of	% of	% of	% of	% of	% of				
	Number	Amount	Number	Amount	Number	Amount	Number	Amount				
FNB's Loans	0.00%	0.00%	0.00%	0.00%	25.00%	40.91%	75.00%	59.09%				
from 1-1-2007 to												
6-30-2008												

Source: Loan sample and U.S. Census data.

The table above shows that the number and dollar volume of business loans in low- and moderate-income CTs is below the percentage of moderate-income CTs in the AA.

The following table shows the geographic distribution of 25 loans to farms within the Hempstead and Lafayette County AA.

Geographic D	Geographic Distribution of Loans to Farms in the Hempstead-Lafayette County AA												
Census Tract	Lo	Low		Moderate		Middle		Upper					
Income Level													
	0.0	0.00%		5.92%		94.08%		0%					
% of AA Farms													
	% of	% of % of		% of	% of	% of	% of	% of					
	Number	Amount	Number	Amount	Number	Amount	Number	Amount					
FNB's Loans	NA	NA	8.33%	57.90%	91.67%	42.10%	NA	NA					
from 1-1-2007 to													
6-30-2008													

Source: Loan sample and U.S. Census data.

The table above shows that the number and dollar volume of business loans in moderate-income CTs exceeds the percentage of moderate-income CTs in the AA.

#### **Responses to Complaints**

First National Bank has not received any formal CRA complaints since the previous examination.

# Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.