

Mail Stop 4561

March 23, 2009

Teresa L. Martin  
Chief Financial Officer and Executive Vice President  
FGBC Bancshares, Inc.  
101 Main Street  
Franklin, Georgia 30217

**Re: FGBC Bancshares, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2007**  
**Form 10-Q for Fiscal Period Ended September 30, 2008**  
**File No. 000-51957**

Dear Ms. Martin:

We have completed our review of your Form 10-K for Fiscal Year Ended December 31, 2007 and your Form 10-Q for Fiscal Period Ended September 30, 2008 and have no further comments at this time.

Sincerely,

Kevin W. Vaughn  
Branch Chief