



SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

November 12, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Northland National Bank
Charter Number 21071

99 N.E. 72nd Street
Gladstone, MO 64118-0000

Office of the Comptroller of the Currency

KANSAS CITY NORTH Field Office
7101 College Boulevard Suite 1600
Overland Park, KS. 66210

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.

SCOPE OF EXAMINATION

The review covered December 30, 2004 through November 12, 2009. Lending volumes were too low to perform a meaningful analysis of lending distribution.

DESCRIPTION OF INSTITUTION

Northland National Bank (NNB) is a community bank with total assets of \$69 million as of June 30, 2009, with net loans comprising 36 percent of total assets. The bank is independently owned with no holding company or affiliates. The only office of the bank is located in Gladstone, Missouri. The bank has one non-depository ATM. Consumer installment and commercial loans are the bank's two primary loan types. NNB's CRA performance was rated "Satisfactory" at the last CRA examination dated December 29, 2003.

DESCRIPTION OF ASSESSMENT AREA(S)

The bank has one assessment area (AA), consisting of the contiguous counties of Clay, Jackson, and Platte in Missouri, and Johnson and Wyandotte in Kansas. The AA contains 449 census tracts, of which 115 are upper-income tracts, 160 middle-income tracts, 117 moderate-income tracts, 45 low-income tracts, and 12 unclassified tracts. 2000 U.S. Census data indicates that 18 percent of families in the AA are low-income, 18 percent moderate-income, 23 percent middle-income, and 41 percent upper-income. Current income designations are based on the 2009 MSA updated median family income figure of \$70,400. The FDIC market share report indicates the bank has a 0.15 percent share of deposits within the AA, which is served by approximately 150 banks. The 10 largest banks have a deposit market share of 55 percent.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank is operating under a consent order (CO) imposed by the Office of the Comptroller of the Currency. The CO requires management and the Board to focus on improving problem assets and restoring the bank to a safe and sound condition. Therefore, origination of new loans has been limited, causing a detailed analysis of lending distribution not to be meaningful. The bank's loan-to-deposit ratio is reasonable at 69 percent. We considered CRA performance to be satisfactory, given the limitations resulting from the bank's condition and the CO.

RESPONSES TO COMPLAINTS

The bank received no CRA related complaints.

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.