

FEE INCOME RATINGS REPORT[™]

PREPARED ON 1/30/2012 EXCLUSIVELY FOR MICHAEL WHITE ASSOCIATES (MWA)

REPORT ORDERED BY:	Michael D. White
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REPORT ORDERED FOR:	
TITLE:	
INSTITUTION:	
ADDRESS:	
PHONE:	
FAX:	
EMAIL:	
CUSTOMIZED REPORT ON:	Investment Program Income
	This report is based on institutional call reports as originally filed with federal banking regulators on

INCLUDES RANKINGS AND COMPARISONS OF THE FOLLOWING:

their required reporting dates.

BANK(s):

#28593 -- Sturgis Bank & Trust Company



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Fee Income Ratings Report on Sturgis Bank & Trust Company

The MWA Fee Income Ratings Report rates the fee income performance of Sturgis Bank & Trust Company against that of other financial institutions earning various types of fee income in the nation, its asset-peer group, region and state. This Ratings Report ranks fee income performance both numerically and by percentile, and it calculates Sturgis Bank & Trust Company's change in rank and percentile year-over-year. The report also compares the institution's compound annual growth rate of selected sources of fee income for three different time periods, starting with its growth over the last year's report period.

Sturgis Bank & Trust Company 119-125 East Chicago Road Sturgis, MI 490910600
Bank
28593
SB
\$339,751.000
Investment Program Income
January 01, 2011 to September 30, 2011
Dollars in thousands (\$000).



FEE INCOME RATINGS REPORT[™]

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Sturgis Bank & Trust Company

	NATION	ASSET CLASS	REGION	STATE
9/30/2011 Investment Program Income		\$300M-\$500M	Midwest	MI
No. of Banks reporting Investment Program Income	1554	266	796	37
Production: Investment Program Income				
Mean	\$2,099.982	\$170.053	\$2,172.938	\$319.946
Sturgis Bank & Trust Company	\$906.000	\$906.000	\$906.000	\$906.000
Rank	158	3	48	Ę
Change in Rank, Year-Over-Year	+2	No Change	-5	No Change
Percentile	89th	98th	93rd	86t
Change in Percentile, Year-Over-Year	-1	No Change	-1	No Chang
Concentration: Investment Program Income as	% of Noninteres	st Income		
Mean	8.9051%	7.4773%	12.4061%	13.2859%
Sturgis Bank & Trust Company	30.9215%	30.9215%	30.9215%	30.9215%
Rank	57	12	28	
Change in Rank, Year-Over-Year	-3	-4	-2	No Change
Percentile	96th	95th	96th	91s
Change in Percentile, Year-Over-Year	No Change	-1	No Change	No Chang
Participation: Investment Program Income as %	% of Noninterest	Fee Income		
Mean	7.6235%	8.1376%	7.6668%	7.2253%
Sturgis Bank & Trust Company	35.1708%	35.1708%	35.1708%	35.1708%
Rank	38	8	17	
Change in Rank, Year-Over-Year	+3	-1	+1	No Chang
Percentile	97th	96th	97th	94t
Change in Percentile, Year-Over-Year	No Change	-1	No Change	No Chang
Contribution: Investment Program Income as %	% of Net Operatin	ig Revenue		
Mean	1.3304%	1.4095%	1.3009%	1.30689
Sturgis Bank & Trust Company	8.6253%	8.6253%	8.6253%	8.6253%
Rank	17	4	7	
Change in Rank, Year-Over-Year	+7	No Change	+2	No Chang
Percentile	98th	98th	99th	97t
Change in Percentile, Year-Over-Year	No Change	No Change	+1	No Chang
Productivity: Investment Program Income per	Employee	1		
Mean	\$1.863	\$1.818	\$1.780	\$1.37
Sturgis Bank & Trust Company	\$7.190	\$7.190	\$7.190	\$7.19
Rank	50	11	26	
Change in Rank, Year-Over-Year	-9	-3	-10	+
Percentile	96th	95th	96th	97t
Change in Percentile, Year-Over-Year	-1	-1	-2	+:



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Sturgis Bank & Trust Company

	NATION	ASSET CLASS	REGION	STATE
9/30/2011 Investment Program Income		\$300M-\$500M	Midwest	MI
No. of Banks reporting Investment Program Income	1554	266	796	37
Density: Investment Program Income per Dom	estic Office			
Mean	\$94.226	\$26.310	\$33.583	\$17.402
Sturgis Bank & Trust Company	\$82.364	\$82.364	\$82.364	\$82.364
Rank	109	20	52	2
Change in Rank, Year-Over-Year	-8	-4	-8	No Change
Percentile	92nd	92nd	93rd	94t
Change in Percentile, Year-Over-Year	-1	-1	-1	No Chang
Penetration: Investment Program Income as %	of Retail Deposi	ts		
Mean	0.0613%	0.0583%	0.0563%	0.0570%
Sturgis Bank & Trust Company	0.3739%	0.3739%	0.3739%	0.3739%
Rank	23	3	7	
Change in Rank, Year-Over-Year	+4	+1	+3	No Chang
Percentile	98th	98th	99th	97t
Change in Percentile, Year-Over-Year	No Change	No Change	+1	No Chang
ROA: Investment Program Income as % of Ass	ets			
Mean	0.0445%	0.0450%	0.0428%	0.04479
Sturgis Bank & Trust Company	0.2667%	0.2667%	0.2667%	0.2667%
Rank	22	3	8	
Change in Rank, Year-Over-Year	+5	+1	+3	No Chang
Percentile	98th	98th	98th	97t
Change in Percentile, Year-Over-Year	No Change	No Change	No Change	No Chang
			,	
Compound Annual Growth in Investment Prog	-6.31%		12 020/	100.070
Industry Total		+12.85%	+13.03%	+23.27%
Sturgis Bank & Trust Company Percent difference between institution and total	+5.84%	+5.84%	+5.84%	+5.84%
	N/A**	-54.55%	-33.18%	-74.90%
Compound Annual Growth in Investment Prog				
Industry Total	-15.24%	+11.16%	+6.94%	-1.99%
Sturgis Bank & Trust Company	+7.50%	+7.50%	+7.50%	+7.50%
Percent difference between institution and total	N/A**	-32.80%	+8.07%	N/A*
Compound Annual Growth in Investment Prog	ram Income, 3 ye	ars		
Industry Total	-19.90%	-1.53%	-7.21%	-16.26%
Sturgis Bank & Trust Company	-9.69%	-9.69%	-9.69%	-9.69%
Percent difference between institution and total	N/A**	N/A**	N/A**	N/A*



SMART BANKS KNOW THAT FEE INCOME CAN MAKE THE DIFFERENCE BETWEEN GOOD EARNINGS AND GREAT EARNINGS.

ARE YOU BRINGING IN AS MUCH FEE INCOME AS YOU CAN?

The MWA Fee Income Ratings Report[™] is the quickest way to determine how your bank is performing, and how your performance compares to banks across the country, in your region and state, and to similarly sized banks. Also, third-party marketers and product providers can use the *Ratings Report*™ to benchmark the competitive performance of their client banks, monitor their competitors, and identify new prospects.

IT'S A SCORECARD FOR YOUR BANK ...

... THAT CAN HELP YOUR TEAM ACHIEVE A WINNING RECORD SEASON AFTER SEASON

	THE INCOM	NE RATI		THE A	FOR		
	P P P A R E D O M		CVALL	ET CO			
NEAL	PeoplesBank, C	Cadorus	Valle	y Co	mpan	Y	
	PeoplesBank, a	Codoros		224	REGION	চা	ATE
		NATIONALLY			Midatlanti		PA
			\$300M-5	362		222	109
003 Total Insuri	Bride Income	4140		302			
Banks reporting	Total insurance me			9.320	\$3,211	626	\$513.064
Insurance In	come	\$869.113		35.000	\$385		\$385.000
COLOR MANAGEMENT AND A DESCRIPTION OF A		\$385.000	\$38	35.000		40	18
plesBank, a Co	dorus Valley Company	328	1	+24		+5	+4
marally.		+137		89th		81st	B3rd
Change in Ranl	k, Year-Over-Year	92nd		+7	No Cl	hange	+1
		+:	3		-	-	
	centile, Year-Over-Year	and the second				4462%	1.1645%
al losurance	Income as % of Noninterest l	2.5489		3.9794%		0802%	9.0802%
		9.0802	%	9.0802%	93	31	15
lean 	Codorus Valley Company		95	39	1	+25	+16
		+4	37	+19		86183	86th
Rank	ank, Year-Over-Year	8	3rd	89()		+10	+12
mila			+9	+1	3	410	
	rercentile, Year-Over-Year		-				1.2845%
Change III I	ce Income as % of Noninteres	t Fee Income	a a hi	4.6126	%	3.5755%	1.2845%
otal Insuran	ce Income as is a	2.97		11.2804		11.2804%	11.2804 %
Mean	Volley Company	11.28			39	28	+9
PeoplesBank	, a Codorus Valley Company		599 +286		+5	+17	87th
Rank	Wer-Year		+286 85th	8	ath	87th	+6
	Rank, Year-Over-Year		+6		+2 +6		10
Percentil			+0	-			
- Change i	e n Percentile, Year-Over-Year	ating Revenue			591	2.0775%	0.5436%
Total Insura	n Percentile, Tear over ance Income as % of Net Oper	1.	0642%	0.98		2.2306%	
		2	2306%	2.23	33	2'	в
PeoplesBa	ink, a Codorus Valley Company		434			+1	9 +9
Deek			+294		+14	90	
Change	e in Ratik, Year-Over-Year		89th		90th		+6
	ille.		+6		+4		
- Chang	e in Percentile, Year-Over-Year						\$1.087
	urance Income per Employee		\$2.513		\$1.395	\$5.8	60 602
			\$2.692		\$2.692	\$2.6	592 13
Mean	Bank. a Codorus Valley Company		489		37		30 +10
Peoples	Bank, a obtores			1	+28		+22 001
- Rank			+514				86th 000

Percentile Change in Percentile, Year-Over-Year

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+12

			+6	+
	, year			
Percent different	+2.96%	+11.96%		
stoom unerence between institution and us i	+78.24%	+78.24%	-6.58%	-41.66%
Compound Apparel C	~2543.24%	+554.18%	+78.24%	+78.24%
Compound Annual Growth in Total Insurance (DCome 2	1004,18%	N/A**	N/A**
People Pool				
PeoplesBank, a Codorus Valley Company	+9.91%	+12.34%	1.074	
orcent difference between institution and the	+41.24%	+41.24%	-1.27%	+11.79%
ompound Annual Growth	+316.15%	+234.20%	*41.24%	+41.24%
ompound Annual Growth in Total Insurance In Industry Total	come. 3 veare	101.2076	NdA**	+249.79%
eoplesBark a Co.				Contraction of the local division of the loc
PeoplesBank, a Codorus Valley Company	N/A	N/A	N/A	
Percent difference between institution and total	N/A	N/A		N/A
	N/A**	N/A**	N/A	N/A
			N/A**	

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Compares your bank's insurance (or investment, or mutual fund and annuity, or fiduciaryrelated) fee income performance to that of other banks earning the same fee income and rates your bank's performance nationally, regionally, statewide, and in its asset-peer group.

Rates your bank's fee income production in 8 performance categories and its growth over 3 time periods - nearly 200 measures by which to compare and rate your bank against the industry... and all on only two pages.

Ranks your bank numerically among all other banks with the same type of fee income - in the country, asset class, region and state.

Reports your bank's year-over-year change in rank and, thus, its rise or fall in the standings.

Rates the bank's performance against others' by percentile, e.g., the 88th percentile documents performance in the top 12% of all banks.

Tracks the bank's year-over-year change in percentile, demonstrating its improvement or decline in performance relative to the marketplace.

Calculates your bank's growth in the chosen fee income during the most recent YTD reporting period over that of the prior year and rates its growth against that of the industry.

Calculates the bank's compound annual growth rate (CAGR) in the selected fee income over two-year and three-year time periods.

Measures your progress in building a particular fee income business by comparing the bank's rate of growth to that of the industry.



BANK FEE INCOME RATINGS REPORT[™] GLOSSARY

Annuity Fee Income

Annuity fee income consists of fees and commissions from sales of annuities (fixed, variable, and other) by the bank and any subsidiary of the bank and fees earned from customer referrals for annuities to insurance companies and insurance agencies external to the consolidated bank. It includes management fees earned from annuities. However, it does not include fee and commissions from sales of annuities by the bank's trust department (or by a consolidated trust company subsidiary) that are executed in a fiduciary capacity.

Annuity fee income also includes the bank's proportionate share of the income or loss before extraordinary items and other adjustments from its investments in equity method investees that are principally engaged in annuity sales. Equity method investees include unconsolidated subsidiaries; associated companies; and corporate joint ventures, unincorporated joint ventures, general partnerships, and limited partnerships over which the bank exercises significant influence.

Assets

Assets are total assets, that is, the sum of all assets owned by the institution including cash, loans, securities, bank premises and other assets. This total does not include off-balance-sheet accounts.

Bank Holding Company (BHC)

A bank holding company (i.e., a regulatory top holder) is any institution that directly or indirectly owns, controls, or has the power to vote 25 percent or more of any class of the voting shares of a bank; controls in any manner the election of a majority of the directors or trustees of a bank; or exercises a controlling influence over the management or policies of a bank.

Compound Annual Growth Rate (CAGR)

Compound annual growth rate (CAGR) is the year over year growth rate of a sum of money over a specified period of time. Calculated by taking the nth root of the total percentage growth rate where n is the number of years in the period being considered. CAGR does not represent reality. It is an imaginary number that describes the average annual compound rate at which a sum of money or investment or, in this case, the amount of fee income grew as though it had grown at a steady rate.

Core Deposits

See "Deposits."

Deposits

In this report, deposits refer to retail or core deposits. These core deposits are total domestic office deposits (demand, savings and time deposits) minus time deposits of \$100,000 or more held in domestic offices. The assumption is made that all demand, savings and time deposits under \$100,000 are core.



Domestic Office

A domestic office or branch is any location, or facility, of a financial institution, including its main office, where deposit accounts are opened, deposits are accepted, checks paid, and loans granted. Some branches include, but are not limited to, brick and mortar locations, detached or attached drive-in facilities, seasonal offices, offices on military bases or government installations, paying/receiving stations or units, nondeposit offices, Internet and PhoneBanking locations where a customer can open accounts, make deposits and borrow money. A branch does <u>not</u> include Automated Teller Machines (ATM), Consumer Credit Offices, Contractual Offices, Customer Bank Communication Terminals (CBCT), Electronic Fund Transfer Units (EFTU), and Loan Production Offices. Summary of Deposits information is required for each insured office located in any State, the District of Columbia, the Commonwealth of Puerto Rico or any U.S. territory or possession such as Guam or the U.S. Virgin Islands, without regard to the location of the main office. Only banks report the number of domestic offices; bank holding companies do not. Thus, "per domestic office" calculations for a BHC are derived by summing the number of branches or domestic offices reported by each bank subsidiary of the BHC.

Employee

Employee refers to bank employee. The number of full-time equivalent employees of the bank and its consolidated subsidiaries at the end of the quarter (rounded to the nearest whole number) is used to calculate particular fee income per employee.

Fee Income

See "Noninterest Fee Income."

Program Concentration

Program concentration is a calculation for examining the portion of total noninterest income attributable to a specific form of bank noninterest fee income. This benchmarking ratio, first introduced, emphasized and now named by MWA, is measured as a percentage of total noninterest income. Calculation of this ratio enables us to know how concentrated or meaningful banks' insurance or investment programs are within their nonlending activities.

Fees and Commissions from Annuity Sales

See "Annuity Fee Income."

Fees and Commissions from Securities Brokerage

See "Securities Brokerage Income."

Fiduciary Income

Fiduciary income is gross income from services rendered by a bank's trust department or by any of its consolidated subsidiaries acting in any fiduciary capacity. It includes commissions and fees on sales of annuities that are executed in a fiduciary capacity. It excludes commissions and fees received for the accumulation or disbursement of funds deposited to Individual Retirement Accounts (IRAs) or Keogh Plan accounts when they are not handled by the bank's trust department.



Financial Holding Company (FHC)

Passage of the Gramm-Leach-Bliley Act (GLBA) in 1999 removed long-standing legal impediments to the combining of banking, insurance, and securities activities within a single financial institution through the formation of financial holding companies (FHCs). Since then, more than 550 domestic bank holding companies (BHCs) have elected financial holding company status, along with a few U.S. securities firms and one large insurance company. A financial holding company is a U.S. bank holding company that has submitted a declaration to become a financial holding company with the appropriate Federal Reserve Bank and whose declaration has been determined to be effective as of the reporting period (e.g., March 31, June 30, September 30, or December 31). Many of the largest bank holding companies are FHCs; most domestic FHCs, however, are relatively small, i.e., with assets less than \$1 billion. As FHCs are BHCs that have elected the status of FHCs, the consolidated financial data of FHCs and their subsidiaries and affiliates are included in this report.

Income from Mutual Funds and Annuities

Income from the sale and servicing of mutual funds and annuities (whether private label, third party or proprietary mutual funds and annuities) includes income earned as a result of sales of these products on the premises of the bank or its subsidiaries; or income earned from the sale of these products by the bank or a subsidiary, or by affiliated or unaffiliated entities from whom the bank reports income. This income may be in the form of fees or sales commissions at the time of the sale or fees earned over the duration of the account (e.g., annual fees, Rule 12b-1 fees or "trailer fees," and redemption fees).

Income that is reported from leasing arrangements with affiliated and unaffiliated entities that lease space in offices of the bank or its subsidiaries for use in selling mutual funds and annuities and fees for providing investment advisory services for mutual funds and annuities is reported as income earned (i.e., on an accrual basis). Mutual fund and annuity income includes fees for providing securities custody, transfer agent, and other operational and ancillary services to mutual funds and annuities that are sold on the premises of the bank, or sold by the bank or its subsidiaries, through a subsidiary, or by affiliated or unaffiliated entities from whom the bank reports income at the time of sale or over the duration of the account. Income includes that earned from sales conducted through the bank's trust department that are not executed in a fiduciary capacity (e.g., trustee, executor, administrator, conservator). Sales conducted by the trust department that are executed in a fiduciary capacity are excluded from mutual fund and annuity income.

Income from Other Insurance and Reinsurance Activities

See "Insurance Brokerage Fee Income."

Insurance and Reinsurance Underwriting Income

Insurance and reinsurance underwriting income is the amount of premiums earned by bank holding company subsidiaries engaged in insurance underwriting or reinsurance activities. It includes earned premiums from (a) life and health insurance and (b) property and casualty insurance, whether (direct) underwritten business or ceded or assumed (reinsured) business. Insurance premiums are reported net of any premiums conveyed in conjunction with reinsurance transfers to or from other insurance underwriters/reinsurers. According to bank regulators, revenues related to long-term life and annuity products are generally recognized when due, while revenues on property, casualty, health, accident and short-term life insurance coverage are recognized *pro rata* over the term of the contract.

Insurance underwriting income also includes the bank holding company's proportionate share of the income or loss before extraordinary items and other adjustments from its investments in equity method



MICHAEL WHITE ASSOCIATES' FEE INCOME RATINGS REPORT™

investees that are principally engaged in insurance underwriting or reinsurance activities. Equity method investees include unconsolidated subsidiaries; associated companies; and corporate joint ventures, unincorporated joint ventures, general partnerships, and limited partnerships over which the bank holding company exercises significant influence.

Income from insurance product sales and referrals is not included in insurance and reinsurance underwriting income. See "Insurance Brokerage Fee Income."

Insurance Brokerage Fee Income

Insurance brokerage fee income is derived from non-underwriting activities and consists mostly of income from insurance product sales and referrals, including service charges, commissions, and fees earned from insurance sales, including credit, life, health, property, casualty, and title insurance products. Insurance income of this nature also includes fees earned from customer referrals for insurance products_to insurance companies and insurance agencies external to the consolidated bank. Also included are management fees from separate accounts and universal life products.

Insurance brokerage fee income also includes the bank's proportionate share of the income or loss before extraordinary items and other adjustments from its investments in equity method investees that are principally engaged in insurance product sales and referrals. Equity method investees include unconsolidated subsidiaries; associated companies; and corporate joint ventures, unincorporated joint ventures, general partnerships, and limited partnerships over which the bank exercises significant influence.

Insurance brokerage fee income does not include any income earned from annuity sales and referrals or insurance underwriting and reinsurance underwriting activities.

Note: Bank insurance brokerage fee income is not available for *MWA Bank Fee Income Ratings Reports*TM prior to January 2003. For the purpose of bank reporting in 2001 and 2002, banking regulators defined "Insurance commissions and fees" to include all income from insurance-related activities, including the premiums earned by banks' insurance underwriters, and management fees from separate accounts, deferred annuities, and other life insurance products. MWA's 2001 and 2002 *BHC Insurance & Investment Fee Income Reports* (the *BHC-FIR*) subtracted those premiums from reported BHC "insurance commissions and fees" in order to arrive at BHC non-underwriting-related insurance fee income, i.e., BHC insurance brokerage fee income. Following our lead, banking regulators in 2003 required both banks and BHCs to report insurance underwriting and insurance sales revenues separately.

Insurance brokerage fee income may alternately be called "Income from Other Insurance and Reinsurance Activities," "Insurance Agency Income," "Insurance Commission Income," "Insurance Commissions and Fees," "Insurance Fee Income," "Insurance Income from Sales and Referrals," or "Insurance Sales Income."

Insurance Fee Income

See "Insurance Income."

Insurance Income

See "Total Insurance Income."



Investment Banking, Advisory, and Underwriting Fees and Commissions

Investment banking, advisory, and underwriting fees and commissions are earned from underwriting (or participating in the underwriting of) securities, private placements of securities, investment advisory and management services, merger and acquisition services, and other related consulting fee. They include fees and commissions from the placement of commercial paper, both for transactions issued in the bank's name and transactions in which the bank acts as an agent for a third party issuer.

Investment banking, advisory and underwriting revenues also include the bank's proportionate share of the income or loss before extraordinary items and other adjustments from its investments in equity method investees that are principally engaged in investment banking, advisory, or securities underwriting activities. Equity method investees include unconsolidated subsidiaries; associated companies; and corporate joint ventures, unincorporated joint ventures, general partnerships, and limited partnerships over which the bank exercises significant influence.

Investment banking, advisory and underwriting fees also constitute a portion of "Investment Fee Income," which has been reported from 2001 through 2006. Since 2007, investment fee income is no longer reported, but MWA still calculates it.

Investment Fee Income

Investment fee income consists of investment banking, advisory, brokerage, and underwriting fees and commissions. These include fees and commissions from securities brokerage activities, from the sale and servicing of mutual funds, from the sale of annuities to bank customers by securities brokerage firms, and from the purchase and sale of securities and money market instruments where the bank is acting as agent for other banks or customers. Additionally, investment fee income includes fees and commissions earned from underwriting securities, private placements of securities, investment advisory and management services, merger and acquisition services, and other related consulting fees. Investment fee income also includes the bank's proportionate share of the income or loss before extraordinary items and other adjustments from its investments in equity method investees that are principally engaged in investment banking, advisory, brokerage, or securities underwriting activities. Equity method investees include unconsolidated subsidiaries; associated companies; and corporate joint ventures, unincorporated joint ventures, general partnerships, and limited partnerships over which the bank excercises significant influence. In 2001, revenues earned from the sale of annuities were all reported as insurance fee income; as of 2002, sales of annuities by securities brokerage firms are now reported as investment fee income.

Representing fee income earned from both the broking and dealing activities of broker-dealers, investment fee income has been reported from 2001 through 2006. Since 2007, investment fee income is no longer reported, but MWA still calculates it by adding "Investment Banking, Advisory, and Underwriting Fees and Commissions," "Securities Brokerage Income," and "Annuity Fee Income."

Investment Program Income

Investment program income is the sum of securities brokerage income and annuity fee income.

Mean

Also referred to as the arithmetic mean or the average, the mean is the sum of scores divided by the number of scores.



Median

The median is the midpoint of a distribution, above which half of the scores occurred and below which half of the scores occurred.

Midatlantic Region

The Midatlantic region includes five states and the District of Columbia: Delaware (DE), District of Columbia (DC), Maryland (MD), New Jersey (NJ), Pennsylvania (PA) and West Virginia (WV).

Midwest Region

The Midwest region includes thirteen states: Illinois (IL), Indiana (IN), Iowa (IA), Kansas (KS), Kentucky (KY), Michigan (MI), Minnesota (MN), Missouri (MO), Nebraska, (NE), North Dakota (ND), Ohio (OH), South Dakota (SD) and Wisconsin (WI).

Mutual Fund and Annuity Income

See "Income from Mutual Funds and Annuities."

N/A

N/A means that Compound Annual growth cannot be calculated for that period because some figures for one of the years in that period are zero or not available.

N/A**

N/A** means that this value is not meaningful because a negative number or zero occurs in either the "Industry Total" or institution's value for that year. For example, if the industry records a net average loss of \$1,000 in insurance income, but an institution records a net loss of \$2,000 in insurance income, it cannot meaningfully be said that the institution outperformed the industry by 100 percent.

#N/A

#N/A means that changes in rank and percentile ratings or compound annual growth cannot be calculated for that period because the institution either changed asset classes, changed certificate numbers, or did not report the previous year.

National Bank (N.A. or N.B.)

A national bank is a commercial bank that possesses a national or federal charter, thus mandating membership in the Federal Reserve. The Office of the Comptroller of the Currency (OCC) supervises national banks. The initials "N.A." for "national association" or "N.B." for "national bank" following its name identify a bank as a national bank.

Net Operating Revenue

Net operating revenue is the sum of net interest income and noninterest income.



Net Securitization Income

Net securitization income consists of net gains (losses) on assets sold in the bank's own securitization transactions, i.e., net of transaction costs. It includes unrealized losses (and recoveries of unrealized losses) on loans and leases held for sale in the bank's own securitization transactions. It includes fee income from securitizations, securitization conduits, and structured finance vehicles, including fees for providing administrative support, liquidity support, interest rate risk management, credit enhancement support, and any additional support functions as an administrative agent, liquidity agent, hedging agent, or credit enhancement agent. And, it includes all other fees (other than servicing fees and commercial paper placement fees) earned from the bank's securitization and structured finance transactions.

Net Servicing Fees

Net servicing fees are earned from servicing real estate mortgages, credit cards, and other financial assets held by others. They include any premiums received in lieu of regular servicing fees on such loans only as earned over the life of the loan.

No Data

Certain *MWA Bank Fee Income Ratings Reports*TM contain the words "No Data" in the fields "Change in Rank" and "Change in Percentile." "No Data" means that, during the prior year, either a bank reported no income in a particular line of fee income or the bank was not a member of that particular peer group (region, state or asset class) for which "No Data" appears.

Noninterest Fee Income

Noninterest fee income is additional noninterest income consisting of insurance commissions; investment banking fees and brokerage commissions; fiduciary income; domestic deposit account service charges; venture capital revenue; net servicing fees from servicing real estate mortgages, credit cards, and other financial assets held by others; net securitization income; and other noninterest income such as rental of safe deposit boxes, the sale of bank drafts, money orders, cashiers' checks, and travelers' checks, and income and fees from the sale and printing of checks.

Noninterest Income

Noninterest income consists of income derived from non-lending activities. Some noninterest income may be fee income. Noninterest income also includes income that is not fee income, such as trading revenue from gains (losses) and fees from foreign exchange transactions; other gains (losses) and fees from trading assets and liabilities; net gains (losses) on sales of loans and leases, other real estate owned, and other assets (excluding securities) and other noninterest income.

Northeast Region

The Northeast region includes seven states, Puerto Rico and the U.S. Virgin Islands: Connecticut (CT), Maine (ME), Massachusetts (MA), New Hampshire (NH), New York (NY), Puerto Rico (PR), Rhode Island (RI), Vermont (VT) and the U.S. Virgin Islands (VI).



Percentile

Percentile is the proportion of scores in a distribution that a specific score is greater than or equal to. For instance, if a particular test score is greater than or equal to the scores of 90 percent of the students taking the test, then the percentile rank of that particular test score would be 90. It would be in the 90th percentile.

Program Concentration

Program concentration is a calculation for examining the portion of total noninterest income attributable to a specific form of bank noninterest fee income. This benchmarking ratio, first introduced, emphasized and now named by MWA, is measured as a percentage of total noninterest income. Calculation of this ratio enables us to know how concentrated or meaningful banks' insurance or investment programs are within their nonlending activities.

Program Contribution

Program contribution measures the contribution that a particular fee income program makes to a BHC's net operating revenues. Net operating revenue is the sum of net interest income and total noninterest income. This benchmark, therefore, measures the proportionate contribution that the fee income program makes to a bank's total revenue.

Program Density

Program density is a new benchmark MWA is making available for the first time. Program density is the amount of program fee income per domestic banking office. Program density measures the relative generation of income among banking locations, which have long been commonly considered to be important physical assets in the generation of customer referrals and the attendant fee income generated from customer relationships.

Program Penetration

While introducing some new benchmarking ratios, the report also reinvigorates a popular old benchmark with new, more reliable data. The old benchmark, long used by the industry, is "penetration," more fully known as "penetration rate or ratio," "retail deposit penetration rate," or variations thereof. The relative penetration of an investment or insurance program may be measured as the amount of program revenue generated per million dollars of core or retail deposits or as a percentage of core or retail deposits. These deposits substitute as a measure of retail customers and the breadth of the customer relationship because the data for retail customers or retail households are hard to obtain on a reliable, national, and standardized basis.

Program Productivity

Program productivity is another new benchmark MWA is making available for the first time. Program productivity is measured as the amount of program fee income per bank employee. This is similar to one of the common benchmarks used in analyzing insurance agencies: agency revenue per agency employee. One expects a program's employee productivity to be markedly higher in more mature investment programs in contrast to new programs. Program productivity measures the relative generation of income among bank employees, who have long been commonly considered to be important human assets in the generation of customer referrals and the attendant fee income generated from customer relationships.



Quartiles

Quartiles are a method of measuring how a data set is distributed by dividing an array of values into four equal-sized groups called quartiles. Technically, however, the term "quartile" refers to the three data points or cut-off values that divide the population into quartiles, not to the four divisions of data. The quartiles include the top or upper quartile, the second or upper-middle quartile, the third or lower-middle quartile, and the bottom or lowest quartile. There are several reasons medians and quartiles are used instead of an average. Medians and quartiles eliminate the influence of an "outlier," an extremely high or low value when compared to the rest of the values. Quartiles also more accurately reflect the range of ratio values than a straight averaging method.

Rank

Rank is a grade of official standing in a hierarchy, or the order according to some statistical characteristic such as the score on a test.

Retail Deposits

See "Deposits."

Savings Association (SA)

Savings associations may possess either a state or federal charter. The Office of Thrift Supervision (OTS) supervises them because they are federally insured. The letters "SA" following its name identify a savings association.

Savings Bank (SB)

The FDIC supervises federally insured state-chartered savings banks, because they are federally insured. The letters "SB" following its name identify a savings bank.

Securities Brokerage Income

Securities brokerage income includes fees and commissions from securities brokerage activities, from the sale and servicing of mutual funds, from the purchase and sale of securities and money market instruments where the bank is acting as agent for other banks or customers, and from the lending of securities owned by the bank or by bank customers. Securities brokerage income does not include income from fiduciary activities, trading revenue, or fees and commissions from the sale of annuities (fixed, variable, and other) to bank customers by the bank or any securities brokerage subsidiary. But, it does also include the bank's proportionate share of the income or loss before extraordinary items and other adjustments from its investments in equity method investees that are principally engaged in securities brokerage activities. Equity method investees include subsidiaries; associated companies; and corporate joint ventures, unincorporated joint ventures, general partnerships, and limited partnerships over which the bank exercises significant influence.

Service Charges on Deposit Accounts

Service charges on deposit accounts include amounts charged depositors in domestic offices for the maintenance of their deposit accounts with the bank, for their failure to maintain specified minimum deposit balances, based on the number of checks drawn on and deposits made in their deposit accounts, for checks drawn on so-called "no minimum balance" deposit accounts, for withdrawals from nontransaction deposit



accounts, for the closing of savings accounts before a specified minimum period of time has elapsed, for deposits to or withdrawals from deposit accounts through the use of automated teller machines or remote service units, for the processing of checks drawn against insufficient funds (so-called "NSF check charges"), for issuing stop payment orders, for certifying checks, and for the accumulation or disbursement of funds deposited to Individual Retirement Accounts (IRAs) or Keogh Plan accounts when not handled by the bank's trust department.

Southeast Region

The Southeast region includes eight states: Alabama (AL), Florida (FL), Georgia (GA), Mississippi (MS), North Carolina (NC), South Carolina (SC), Tennessee (TN) and Virginia (VA).

Southwest Region

The Southwest region includes six states: Arkansas (AR), Arizona (AZ), Louisiana (LA), New Mexico (NM), Oklahoma (OK) and Texas (TX).

State-Chartered, Fed-Member Bank (SM)

A state-chartered, Fed-member bank is a commercial bank with a state charter that has elected to become a member of the Federal Reserve. Because the bank is a Fed member, the Federal Reserve supervises this bank. A Fed-member state-chartered bank's classification code is "SM."

State-Chartered, Non-Member Bank (NM)

A state-chartered, non-member bank is a commercial bank with a state charter. "Non-member" refers to the fact that the bank is not a member of the Federal Reserve. Since the bank is not a member of the Federal Reserve (or, nonmember), the FDIC supervises this bank. A non-member state-chartered bank's classification code is "NM."

Total Insurance Income

Total insurance income includes all income from insurance brokerage sales activities and insurance underwriting or reinsurance activities. Insurance income also includes the bank's proportionate share of the income or loss before extraordinary items and other adjustments from its investments in ventures over which the bank exercises significant influence that are principally engaged in insurance underwriting, reinsurance, or insurance sales activities.

Total insurance income does not include commissions and fees that the bank earns from the sale of annuities to bank customers by the bank's securities brokerage firm, which are now reported as investment fee income. It also excludes commissions and fees from sales of annuities by the bank's trust department (or by a consolidated trust company subsidiary) that are executed in a fiduciary capacity. The year 2003 marked the first time that insurance commissions and fees were reported separately from underwriting and reinsurance income.

Total Insurance Sales Income

Total insurance sales income is the sum of annuity commissions and fees plus insurance brokerage income.



Total Insurance Sales and Underwriting Income

Total insurance sales and underwriting income is the sum of total insurance sales income plus insurance underwriting income. That is the same as the sum of annuity, insurance brokerage and insurance underwriting income, which is also equivalent to the sum of total insurance income (i.e., the sum of insurance brokerage and underwriting income) plus annuity commissions and fees.

Trading Revenue

Trading revenue is the net gain or loss from trading cash instruments and derivative contracts (including commodity contracts) that has been recognized during the calendar year-to-date. Trading revenue includes revaluation adjustments to the carrying value of cash instruments resulting from the periodic marking to market of such instruments. It also includes revaluation adjustments from the periodic marking to market of interest rate, foreign exchange rate, commodity, and equity derivative contracts. And, it includes incidental income and expense related to the purchase and sale of assets and liabilities reportable as "trading assets" and "trading liabilities" and off-balance-sheet derivative contracts and credit derivatives contracts that are held for trading purposes.

Venture Capital Revenue

In general, venture capital activities involve the providing of funds, whether in the form of loans or equity, and technical and management assistance, when needed and requested, to start-up or high-risk companies specializing in new technologies, ideas, products, or processes. The primary objective of these investments is capital growth. Venture capital revenue includes market value adjustments, interest, dividends, gains, and losses (including impairment losses) on venture capital investments (loans and securities). It includes any fee income from venture capital activities not reported in other noninterest fee income items of the income statement. Also, venture capital revenue includes the bank's proportionate share of the income or loss before extraordinary items and other adjustments from its investments in equity method investees that are principally engaged in venture capital activities. Equity method investees include unconsolidated subsidiaries; associated companies; and corporate joint ventures, unincorporated joint ventures, general partnerships, and limited partnerships over which the bank exercises significant influence that are principally engaged in venture capital activities.

Wealth Management Income

MWA defines Wealth Management Income as consisting of both trust or fiduciary-related revenues and mutual fund & annuity fee income. MWA also includes insurance brokerage fee income in Wealth Management Income, if the bank earns it. But, the bank must always earn both fiduciary and mutual fund & annuity fee income in order to be deemed as having a wealth management program. If a bank earns only fiduciary-related revenues, then it doesn't have a wealth management program. It has a trust program, and its trust program is better compared, ranked and rated as a trust program, not a wealth management program.

West Region

The West region includes eleven states and three territories: Alaska (AK), American Samoa (AS), California (CA), Colorado (CO), States of Micronesia (SM), Guam (GU), Hawaii (HI), Idaho (ID) Montana (MT), Nevada (NV), Oregon (OR), Utah (UT), Washington (WA) and Wyoming (WY).