





**Bank of America Corporation****BAC NYSE****Banks** Market Capitalization USD: **\$62,021.89 mm****CONCERN LEVEL: AVERAGE**

- 1 The CEO's total remuneration is within the typical market range for the relevant industry and market cap.
- 2 The ratio between the CEO's pay and the median pay of the other named executive officers is 3X or less.
- 3 The CEO's annual cash incentives rose or fell in line with annual performance. 
- 4 The CEO received no more than one annual cash bonus this fiscal year.
- 5 The CEO's equity remuneration reflected the company's share price movement over the last five years. 
- 6 The company only pays long-term incentives to the CEO for above median performance against a peer group. 
- 7 The company's dilution from equity incentives is 10 percent or less.
- 8 Unvested equity lapses when the CEO's employment is terminated. 
- 9 The CEO's potential cash severance payment is capped at two times annual cash remuneration.
- 10 The accrued benefits of the CEO's post-retirement income are within the typical market range for the relevant market cap bracket.

CEO: Brian T. Moynihan**Age: 52 CEO Since: 2010**

	2009	2010	2011
Base Salary	\$0	\$950,000	\$950,000
Discretionary Bonus	\$0	\$0	\$0
Annual Cash Incentive	\$0	\$0	\$0
Benefits and Perquisites	\$32,171	\$270,234	\$420,524
TOTAL ANNUAL COMPENSATION	\$32,171	\$1,220,234	\$1,370,524
Increase in Post-Retirement Benefits	\$4,177,495	\$719,835	\$604,698
Stock Option Awards	\$0	\$0	\$0
Stock Awards	\$0	\$0	\$6,111,959
TOTAL COMPENSATION	\$4,209,666	\$1,940,069	\$8,087,181
Median of Other Named Executive Officers Total Compensation	\$13,304,620	\$5,892,183	\$10,280,817
Value Realized on Exercise of Stock Option	\$0	\$0	\$0
Value Realized on Vesting of Stock	\$1,468,792	\$1,039,287	\$703,008
TOTAL REALIZED EQUITY COMPENSATION	\$1,468,792	\$1,039,287	\$703,008

Proxy Date: 28 Mar 2012
Annual Meeting Date: 9 May 2012
Equity Reserves: 9.20%
Stock Option Run Rate: 0.00%

Bank of America Corporation

BAC NYSE

Banks

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Performance Comparison

■ S&P500 ■ Industry ■ BAC



Peer Comparisons (TRBC) =Banks

Total Summary CEO Compensation

Ticker	Company Name	2009	2010	2011	Market Cap
BAC	Bank of America Corporation	\$4,209,666	\$1,940,069	\$8,087,181	\$62,021,887,493
WFC	Wells Fargo & Company	\$21,340,547	\$18,973,722	\$19,843,021	\$127,165,464,000
JPM	JPMorgan Chase & Co.	\$1,322,094	\$20,816,289		\$117,439,386,331
C	Citigroup Inc.	\$128,751	\$1	\$14,857,103	\$74,812,297,494
USB	U.S. Bancorp	\$8,211,846	\$18,771,205	\$13,619,458	\$45,218,582,880
PNC	PNC Financial Services Group, Inc. (The)	\$18,027,856	\$16,600,793	\$16,607,150	\$25,359,553,356

To insure consistency, peer comparisons are based on a combination of TRBC Industry and Sector classifications and company market caps. Missing peer pay figures for 2011 are due to differences in company filing schedules.

Pay Peer Group

Primary competitor group: Citigroup, Goldman Sachs, JPMorgan Chase, Morgan Stanley and Wells Fargo.

International Financial Institutions: Banco Santander, Barclays, BNP Paribas, Credit Suisse, Deutsche Bank, HSBC, Royal Bank of Scotland and UBS.

U.S. Headquartered Global companies: Abbott Laboratories, AT&T, Chevron, Cisco, Coca-Cola, ConocoPhillips, Exxon Mobil, General Electric, Hewlett-Packard, IBM, Intel, Johnson & Johnson, PepsiCo, Pfizer, Philip Morris International, Procter & Gamble, Verizon and Wal-Mart.

Performance Peer Group

NA

COMPENSATION COMMITTEE MEMBERS

Director	Membership	Age	Gender	Tenure	Independence
Robert W. Scully	Chairman	62	Male	3	Outside
Donald E. Powell	Member	71	Male	3	Outside
Mukesh D. Ambani	Member	55	Male	1	Outside
Virais W. Colbert	Member	72	Male	3	Outside

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