

**FIRST NATIONAL BANK**



2520032543540

**ST. IGNACE 49781**  
**MICHIGAN**

JAMES F. DROSKIE, EXECUTIVE VICE PRESIDENT

June 25, 1986

Office of Employee Benefits Security  
Labor-Management Services Administration  
U. S. Department of Labor  
Washington, D. C. 20216

Gentlemen:

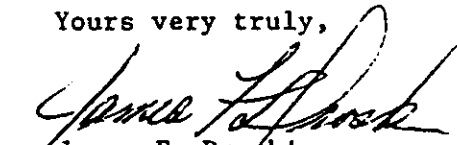
Pursuant to Section 110 of the Employee Retirement Income Security Act of 1974, the following statement is submitted in compliance with the reporting and disclosure requirements of Part 1 of the Act. The employer's name, address and employer identification number is:

First National Bank of St. Ignace  
132 North State Street  
St. Ignace, MI 49781  
38-0996926

The undersigned Plan Administrator hereby declares that the employer maintains a plan or plans primarily for the purpose of providing deferred compensation for a select group of its directors. There is only one such plan which includes six directors.

The Administrator will provide any plan documents upon request as required by Section 104 (a) (1) of the Act.

Yours very truly,

  
James F. Droskie  
Plan Administrator

r11



# *First National Bank*

*132 N. State St.  
St. Ignace, Michigan 49781  
(906) 643-6800*

December 21, 1992

Top Hat Plan Exemption  
Pension and Welfare Benefits  
200 Constitution Ave., N.W.  
Room N-5644  
Washington, DC 20210

Dear Sir:

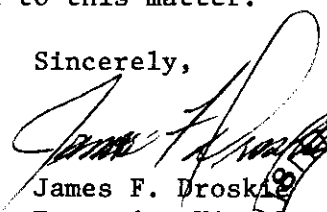
It has been brought to my attention by John M. Odem in his letter of December 14, 1992, a copy of which I am enclosing, that you do not have record of receiving my June 25, 1986 letter pursuant to Section 110 of the Employee Retirement Income Security Act notifying you of First National Bank's intention to establish a deferred compensation plan for six of its directors.

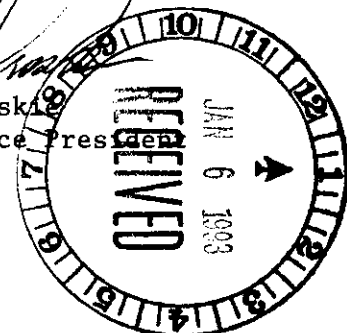
I am enclosing a copy of my June 25, 1986 letter informing you of the plan along with a copy of an Affidavit of Compliance from John M. Odem, President of Aries Financial Management, Inc. indicating that to the best of his knowledge and belief, the letter was submitted in a timely fashion and an affidavit signed by myself concerning the fact that said notification letter was sent on June 25, 1986.

Please advise at your earliest convenience if this satisfies your compliance requirements.

Thank you for your prompt attention to this matter.

Sincerely,

  
James F. Droski  
Executive Vice President



amg




# First National Bank

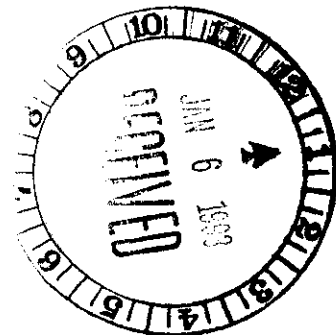
132 N. State St.  
St. Ignace, Michigan 49781  
(906) 643-6800

I hereby confirm, to the best of my knowledge and belief, that the attached letter is a copy of the letter prepared by the plan administrator at the time the plan was adopted and that the original was submitted to the Department of Labor in compliance with Regulation 2540.104-23 on June 25, 1986.

First National Bank  
132 North State Street  
St. Ignace, MI 49781  
38-0996926

  
Andrea M. Goudreau  
Witness

  
James F. Droskie  
Plan Administrator



## Affidavit of Compliance

As a provider of accounting services for non-qualified plans, we searched our files for copies of letters showing compliance with the alternative filing method allowed under Reg. 2520.104-23. In cases where we did not have a letter on file, we requested that the plan sponsor search its files for a copy of the letter. In those cases where no letter was found we advised the companies to file a letter and pay the \$1,000 penalty.

For the cases where we did have records of filing a letter we sent a listing to Ms. Faye Jackson in the Public Disclosure Office to get assurance that the letters had been received and recorded since we had been told that some notices may have been mishandled by the Department of Labor. The indication from Ms. Jackson was that the attached letter was not recorded as received. We are including this copy with the following affirmation so that you may update your records to indicate proper compliance by this plan.

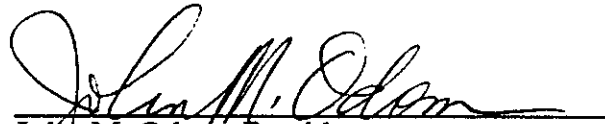
### AFFIRMATION

I hereby affirm, under penalty of perjury, that, to the best of my knowledge and belief, the attached letter is a true copy of the original letter submitted by:

First National Bank  
132 North State Street  
St. Ignace, MI 49781  
38-0996926

and that the original letter was filed within the time limits required by Reg. 2520.104-23. I further affirm that our files indicate that the letter was mailed via First Class mail on or about June 25, 1986.

  
Witness

  
John M. Odom, President  
Aries Financial Management, Inc. d/b/a  
Executive Plan Services

# EXECUTIVE PLAN SERVICES

920 Pierremont, Suite 108  
Shreveport, LA 71106  
Phone: (318) 865-9020  
Toll Free: 800-523-9872

December 14, 1992

Mr. James Droskie, Executive Vice President  
First National Bank  
P. O. Box 187  
St. Ignace, MI 49781

Dear Mr. Droskie:

Because of the stepped up compliance audit relating to Top Hat plans, we asked the Department of Labor to verify to us that their records reflected that they had received the notice you sent regarding the existence of the plan at your bank.

Ms. Faye Jackson, in the Public Disclosure Office, has notified us that the letter is not reflected on their file. We then contacted Mr. Blake Smith in the Compliance Office. Mr. Smith informed us that we could either file a new letter and pay the \$1,000 penalty, or send a copy of the original letter with an affidavit that the original letter was filed in accordance with the regulation. He said, further, that he would recommend sending the affidavit, under penalty of perjury, because everyone was aware that many of the letters that were sent were mishandled and not properly recorded.

Since we provide plan services and were able to locate a copy of the original letter in our files, we have forwarded a copy of the original letter with the attached affidavit to the Department of Labor. We feel it would add strength to your position if an additional affidavit were signed by the same official who signed the original letter, or by the company official who is currently the plan administrator.

Attached is a sample affidavit to use as a guide. If you would be more comfortable, you may want to submit the \$1,000 penalty. The affidavit (or the penalty) should be sent to the Department of Labor at the following address prior to December 31, 1992:

Top Hat Plan Exemption  
Pension and Welfare Benefits  
200 Constitution Ave. N.W.  
Room N-5644  
Washington, DC 20210

If you have any questions, please don't hesitate to call.

Sincerely,

  
John M. Odom

bb  
enclosure

cc: David White  
David Bell (MBA)