



214 West First Street  
Oswego, NY 13126  
Telephone: (315) 343-0057  
Facsimile: (315) 342-9403

Thomas W. Schneider  
*President and Chief Executive Officer*

2520040763338

January 28, 2004

Secretary of Labor  
U.S. Department of Labor  
Pension and Welfare Benefits Administration  
Top Hat Plan Exemption, Room N-5644  
200 Constitution Avenue, N.W.  
Washington, DC 20210


Re: Alternative Reporting and Disclosure Statement for Nonqualified Deferred Compensation Plans

To the Secretary of Labor:

In compliance with the requirements of the alternative method of reporting and disclosure under Part I of Title I of the Employee Retirement Income Security Act of 1974 for unfunded or insured pension plans for a select group of management or highly compensated employees, specified in Department of Labor Regulations, 29 C.F.R. § 2520.104-23, the following information is provided by the undersigned administrator:

- (1) The name of the employer is: PathFinder Bank
- (2) The mailing address of the employer is: 214 West First Street  
Oswego, NY 13126
- (3) The Employer Identification Number is: 15-0408130
- (4) The above-named employer maintains a plan (or plans) primarily for the purpose of providing deferred compensation benefits for a select group of management or highly compensated employees.
- (5) In addition to plans previously reported, employer has adopted two (2) new plans one of which covers six (6) Trustees and one of which covers three (3) officers.
- (6) The employer will provide a copy of the agreement(s) to the Secretary of Labor upon request.

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By:   
(Plan Administrator)

Dated: January 26, 2004

Enclosed you will find a self-addressed stamped envelope. I respectfully request that you return a date stamped copy to us at your earliest convenience.

Thank you for your assistance in this matter.

Sincerely,



Thomas W. Schneider  
President & CEO

TWS/tlc

Enclosures

