



" We Create Solutions."

October 20, 1997

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DOL-PWBA
PUBLIC INFORMATION
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Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, D.C. 20210

Dear Sir or Madam:

Pursuant to Department of Labor Regulation 2520.104-23, the following information is being provided regarding a nonqualified Incentive Retirement plan sponsored by our organization for a select group of management or highly compensated employees.

1. Name of the employer: Sterling Bank and Trust, FSB
2. Mailing address of the employer: One Towne Square, Suite 1700, Southfield, MI 48076
3. Employer's Federal Identification Number (EIN): 38-2524834
4. Number of plans maintained: One
5. Number of participants in each plan: Twelve
6. Date plan was implemented: June 6, 1997

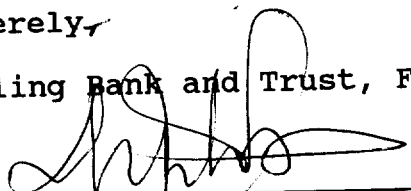
We will provide plan documents upon request in accordance with ERISA Section 104(a)(1).

Please contact us if you have any questions on any of the above information.

Sincerely,

Sterling Bank and Trust, FSB

By:


Drexel Amy
Plan Administrator





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Office of the General Counsel

October 24, 1997

NOV - 3 11 19 97
DOL-PH/PA
PUBLIC AFFAIRS

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Notice of non-qualified incentive retirement plan

Dear Sir or Madam:

On June 6, 1997, Sterling Bank and Trust, FSB implemented a nonqualified incentive retirement plan. It is our belief that the enclosed notice was filed with the Department of Labor on a prior date but we are unable to confirm this since the employee responsible for filing the notice is no longer with the Company and our file does not contain a copy. As a result, we are requesting the Department of Labor to either forward a duplicate of the notice previously filed with the receipt date for our records or accept the enclosed notice as if it was timely filed by Sterling Bank and Trust, FSB.

Please forward a copy of the notice or the Department of Labor's response to our request to my attention at the following address:

Sterling Bank and Trust, FSB
One Towne Square, 17th Floor
Southfield, MI 48076

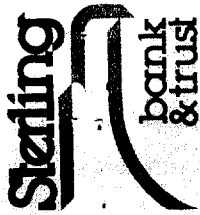
Your cooperation with this matter is greatly appreciated. If you should have any questions, please do not hesitate to contact me at (248) 948-8728.

Sincerely,


Amy L. Bishop
Associate Attorney

enclosure





"We Create Solutions."

One Towne Square
17th Floor
Southfield, MI 48076

Fold at line over top of envelope to
the right of the return address

CERTIFIED

P 133 985 971

MAIL



Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Ave. N.W.
Washington D.C. 20210

