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**Sterling Insurance Company**


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April 24, 2008

Top Hat Plan Exemption  
 Employee Benefits Security Administration  
 Room N-1513  
 U.S. Department of Labor  
 200 Constitution Avenue, N.W.  
 Washington, D.C. 20210

Certified Return Receipt  
 Certified # 7006 3450 0002 8513 9018

Re: Top Hat Plan Filing

Dear Sir or Madam:

On January 11, 2008, an amended and restated Deferred Compensation Agreement was entered into by Sterling Insurance Company and Stephen A. Harris ("Agreement"). Set forth below is a top hat plan filing for this amended and restated Agreement in accordance with the procedures described in 29 C.F.R. § 2520.104-23:

1. Name and Address of Employer - -  
 Sterling Insurance Company  
 182 Barnerville Road  
 PO Box 9  
 Cobleskill, NY 12043-0009
2. Employer Identification Number - - 14-1093900
3. Employer Statement - - Sterling Insurance Company maintains the Agreement primarily for the purpose of providing deferred compensation for a management or highly compensated employee.
4. Number of Top Hat Pension Plans and the Number of Employees in Each -- The Agreement covers one employee. Sterling Insurance Company Presently has one other top hat pension plan that covers one employee.

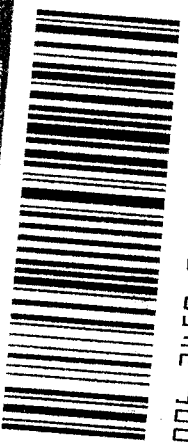
If you need any additional information, please contact me.

Sincerely,

Patricia A. MacNeil  
 Secretary

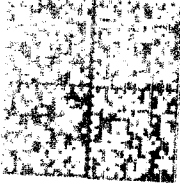
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**REGISTERED MAIL**



7006 3450 0002 8513 9018

**nce Company**  
Skill, New York 12043-0009



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RETURN RECEIPT REQUESTED

