

**Patterson Belknap Webb & Tyler** LLP

1133 Avenue of the Americas New York, NY 10036-4710 212.336.2000 fax 212.336.2222 www.pbwt.com

January 29, 2009

Bruce L. Wolff  
(212) 336-2959  
blwoff@pbwt.com**By Certified Mail - Return Receipt Requested**

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

Dear Sir/Madam:

In accordance with Department of Labor Regulation Section 2520.104-23(b) (the "Regulation"), we, on behalf of Pentegra Services, Inc. (the "Company"), hereby submit the following information with respect to the below-referenced plans.

Employer: Pentegra Services, Inc.  
108 Corporate Park Drive  
White Plains, NY 10604

Employer Identification Number: 13-3745616

Declaration: The Company maintains the Pentegra Services, Inc. Benefit Equalization Plan (the "Pentegra BEP"), Pentegra Services, Inc. Benefit Equalization Plan for Robert C. Albanese (the "Albanese BEP"), and Pentegra Services, Inc. Supplemental Executive Retirement Plan for Robert C. Albanese (the "Albanese SERP") (collectively, the "Plans") primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The Company, through action of the Company's Board of Directors, has adopted the applicable plan documents for the Plans in December 2008.

Number of employees participating in the (i) Pentegra BEP is 5; (ii) Albanese BEP is 1; and (iii) Albanese SERP is 1.

In accordance with the Regulation, the Company will provide copies of the Pentegra BEP, Albanese BEP and Albanese SERP to the Department of Labor upon request.

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If you have any questions, please contact the undersigned.

Please acknowledge receipt of this letter by date stamping and returning to the undersigned the enclosed copy of this letter. An addressed, postage-paid envelope is enclosed for this purpose for your convenience.

Sincerely,

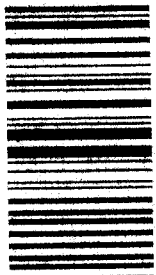


Bruce L. Wolff

cc: Robert D. Alin, Esq., Senior Vice President  
and General Counsel  
Bernard F. O'Hare, Esq.

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