



Anita C. Greer  
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October 1, 2010

**Certified Mail (Return Receipt Requested)**

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

EBSA/PUBLIC DISCLOSURE  
 2010 OCT -7 PM 3:38

Dear Sir or Madam:

Re: Alden State Bank Executive Incentive Retirement Plan (the "Plan");  
Dated as of September 20, 2010

Pursuant to Department of Labor Regulations § 2520.104-23, this statement is filed for the Plan for the purpose of satisfying the reporting and disclosure requirements of Part 1 of Title I of the Employee Retirement Income Security Act of 1974. Alden State Bank, pursuant to the terms of the Plan, provides unfunded, additional retirement benefits for a select group of management or highly compensated employees. The following information is included as part of this statement.

1. The name and address of the employer:  

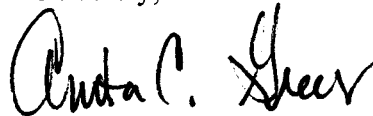
Alden State Bank  
 13216 Broadway  
 Alden, NY 14004
2. The Employer Identification Number assigned by the IRS to the employer:  

16-0327665
3. The employer maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. There are three employees covered under the Plan. This coverage number is accurate as of October 1, 2010, and the number of employees covered after that date may change.
4. The Plan was adopted on September 20, 2010, with an effective date of September 20, 2010.

A copy of the Plan is available upon request as required by Section 104(a)(1) of ERISA.

The undersigned attorney respectfully submits this statement on behalf of the employer.

Sincerely,



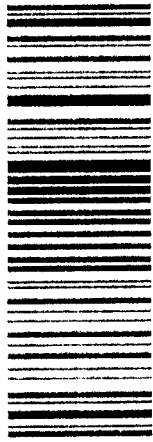
Anita C. Greer

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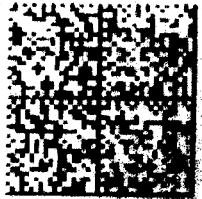
cc: Steve Woodard



The Guaranty Buildings  
140 Pearl Street, Suite 100  
Buffalo, New York 14202-4040



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