

BRYAN CAVE

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November 3, 2011

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. Department of Labor
 Employee Benefits Security Administration
 Top Hat Program Exemption
 200 Constitution Avenue, NW, N-1513
 Washington, DC 20210

Re: Bank of Cleveland – Supplemental Executive Retirement Agreements

Dear Sir or Madam:

On behalf of Bank of Cleveland, I submit this statement to exempt the Supplemental Executive Retirement Agreements (collectively, the “Plan”) from further compliance with the reporting and disclosure provisions of Part 1 of Title I of the Employee Retirement Income Security Act of 1974, as amended, in connection with its maintenance of the Plan. This statement is prepared and submitted pursuant to Department of Labor Regulations Section 2520.104-23b.

Bank of Cleveland has established the Plan primarily for the purpose of providing supplemental retirement benefits for two highly compensated employees of Bank of Cleveland. Bank of Cleveland maintains no other plan of the same type.

As of the Plan’s establishment, two (2) employees were eligible to participate in the Plan.

Bank of Cleveland is the sponsoring employer of the Plan and its address is Bank of Cleveland, 75 Bobby Taylor Avenue, Cleveland, TN 37311. The employer identification number for Bank of Cleveland is 62-1308417.

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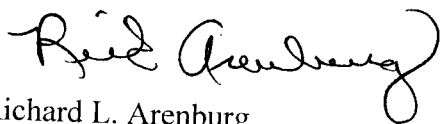
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U.S. Department of Labor
November 3, 2011
Page 2

If you have any questions or comments about this filing, please contact me at the address indicated above.

Sincerely,

A handwritten signature in cursive script that reads "Richard L. Arenburg". The signature is written in black ink and is positioned above the printed name.

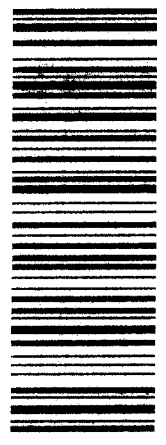
Richard L. Arenburg

cc: Mr. Scott Taylor

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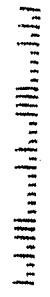
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