



Serving the Community Since 1905

Sturgis Bank & Trust Company

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February 16, 2001

Manager, Dissemination Branch
Office of Thrift Supervision
Information Management & Services Division
100 G Street, N.W.
Attention: Docket No. 2000-91
Washington, D.C. 20552

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DIVISION

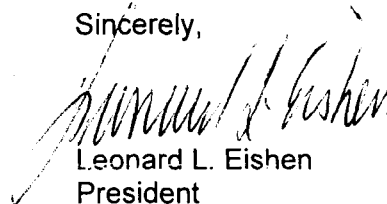
Re: Savings & Loan Holding Companies Notice of Significant Transactions
or Activities and OTS Review of Capital Adequacy, 65 Fed. Reg. 64392
(October 27, 2000)

Dear Sir or Madam:

We are a Michigan State chartered Savings Bank. We have had under consideration for several months forming a holding company. We were undecided rather to do so through the Federal Reserve System or OTS. Because of these proposed regulations, my Board of Directors took action to use the Federal Reserve System. We consider this proposed rule to be unnecessary and burdensome and in our view the Federal Reserve System holding company rules are much more flexible.

Unless the proposal is dropped, I predict more and more thrifts opting to the Federal Reserve.

Sincerely,



Leonard L. Eishen
President

LLE:jlw
cc: Charlotte Bahin
ACB, 900 19th Street, N.W.
Washington, D.C. 20006
file

Corporate Headquarters

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