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October 31, 1996

TO: Office of Employee Benefits Security
Labor-Management Services Administration
U.S. Department of Labor
Washington, D.C. 20216

FROM: Turner & Company, Inc.
2000 S.E. 15th, Bldg 450-C
Edmond, OK 73013
73-0796610 (Employer Identification Number)

This notification will serve as the statement required by 29 C.F.R., Section 2520.104-23 (a) (1), with regards to non-qualified deferred compensation plans, maintained by the above employer, which are primarily for the purpose of providing deferred compensation for tenured staff.

There is currently one plan of this nature in effect. It covers six employees.

Sincerely,

Derek S. Turner

Derek S. Turner
President

DST:tdk

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