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Marshalltown Trowel Company

Letters: P.O. Box 738; Parcels/Shipments/All else: 104 South 8th Avenue; Marshalltown, Iowa 50158 USA
General Office: 515/753-5999; Sales: 515/753-0127; Fax: 515/753-6341



September 28, 1992

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

Re: Updated report on deferred compensation plan - original
letter of 8/10/84 attached, Reporting and Disclosure
Rev. Reg. 2520.104-23

Attached is a copy of a letter sent to the U.S. Dept. of Labor on August 10, 1984. Marshalltown Trowel Company established a deferred compensation plan on July 1, 1984. The plan is maintained by this Company as the employer for the purpose of providing deferred compensation for a select group of management and highly compensated employees. Benefits are paid solely from the general assets of our Company or from insurance contracts purchased by our Company from the general assets.

Name and Address of Employer: MARSHALLTOWN TROWEL COMPANY
104 S. 8th Ave.
Marshalltown, Iowa 50158

Employer Identification Number: 42-0397040

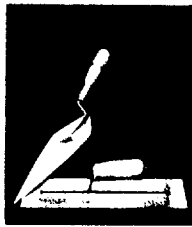
Number of Plans of Deferred Compensation one

Number of Plan Participants 21

Yours very truly,
MARSHALLTOWN TROWEL COMPANY

Katherine L. Behm
Secretary-Treasurer
Plan Administrator

cc: Jack Minner, The Todd Organization
Larry McComber



GENERAL OFFICE 515/754-6100
SALES OFFICE 515/754-6116
TELEX 439082



Marshalltown Trowel Company

P.O. BOX 738 • 104 SOUTH 8th AVENUE • MARSHALLTOWN, IOWA 50158 USA

U.S. Department of Labor
Pension Welfare Benefit Program
Labor Management Service Administration
Room N-4633
200 Constitution Ave., N.W.
Washington, D.C. 20216

August 10, 1984

Re: Nonqualified deferred compensation plan - Reporting and
Disclosure Rev Reg. 2520.104-23

It is our understanding that a plan of deferred compensation which our Company has established effective July 1, 1984, needs to provide notification to you under the "alternate method of compliance" as follows:

1. The plan is maintained by this Company as the employer for the purpose of providing deferred compensation for our management and non-union supervisory personnel.
2. Benefits will be paid solely from the general assets of our Company or from insurance contracts purchased by our Company from the general assets.

The following additional information is provided as further information.

Name of Employer:	Marshalltown Trowel Company
Address of Employer:	104 S. 8th Ave. Marshalltown, Iowa 50158
Employer Identification No.	42-0397040
Number of Plans of Deferred Compensation	one
Number of Plan Participants	20

Yours very truly,

MARSHALLTOWN TROWEL COMPANY

RBB/js



R.B. Becker
Vice President

Manufacturers of High Grade Tools Since 1890