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(1902-1982)

January 22, 1997

2520032031887

Top Hat Plan Exemption
Pension & Welfare Benefit Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, D.C. 20210

RE: S. A. Morman & Company

Dear Sir or Madam:

We are writing on behalf of our client, S. A. Morman & Company. Our client maintains an unfunded deferred compensation plan for a select group of management or other highly compensated employees (a "top hat" plan).

Pursuant to Department of Labor regulations Section 2520.104-23, we are supplying the following information to you:

1. Employer's Name and address:

S. A. Morman & Company
801 Century S.W.
Grand Rapids, MI 49503
2. Employer's EIN: 38-1606089
3. S. A. Morman & Company maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or other highly compensated employees.
4. One (1) plan is maintained at the current time. The plan has two (2) participants.
5. A copy of the plan document will be provided upon request.

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FBI - GRAND RAPIDS

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ATTORNEYS

DDI - PWBA
PUBLIC DISCLOSURE

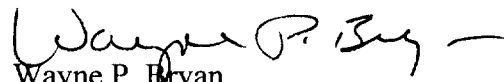
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Please contact us if you have any questions regarding this filing or need any additional information.

Very truly yours,

McSHANE & BOWIE, P.L.C.


Wayne P. Bryan

WPB:jl
cc: Douglas M. Hoogerhyde

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