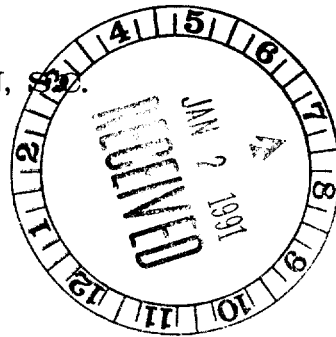


CONGDON, WARD & WALDEN, S.C.

ATTORNEYS AT LAW
707 W. MORELAND BOULEVARD
P.O. BOX 377
WAUKESHA, WISCONSIN 53187
(414) 547-5517



FACSIMILE (414) 547-7517

RICHARD CONGDON
JAMES WARD
JAMES R. WALDEN, JR.
DOROTHY A. CASE
GERALD L. CROUSE, JR.
KURT M. SCHUSTER

CERTIFIED MAIL - RETURN RECEIPT

2520040152503

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

To the Secretary of Labor:

In compliance with the requirements of the alternative method of reporting and disclosure under Part 1 of the Title I of the Employee Retirement Income Security Act of 1974 for unfunded or insured pension plans for a select group of management or highly compensated employees, specified in Department of Labor Regulations, 29 C.F.R. Sec. 2520.104-23, the following information is provided by the undersigned employer.

Name and address of Employer: Congdon, Ward & Walden, S.C.
707 West Moreland Blvd.
Waukesha, WI 53186

Employer Identification Number: 39-1367647

Congdon, Ward & Walden, S.C. maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Number of Plans and
Participants in Each
Plan: 1 Plan covering 1 employee

The employer will provide a copy of the agreement to the Secretary of Labor upon request.

Dated 19th day of October, 1990.

Congdon, Ward & Walden, S.C.

BY: 
Plan Administrator