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Rooney Brothers Company

111 West Fifth Street • Tulsa, Oklahoma 74103-4253 • 918/583-6900 • Fax 918/592-4334

July 8, 1994

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

JUL 25 1994
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Dear Sir or Madam:

Pursuant to Department of Labor Regulation 2520.104-23, the following information is being provided regarding a nonqualified salary continuation plan sponsored by our organization for a select group of management or highly compensated employees.

1. Name of the employer: Rooney Brothers Company
2. Mailing address of the employer:
111 West 5th Street, Suite 100
Tulsa, Oklahoma 74103
3. Employer's Federal ID Number (EIN): 73-1237809
4. Number of plans maintained: One
5. Number of participants in each plan: One
6. Date plan was implemented: July 1, 1994

We will provide plan documents upon request in accordance with ERISA Section 104(a) (1).

Please contact us if you have any questions on any of the above information.

Very truly yours,

ROONEY BROTHERS COMPANY

By 

L. F. Rooney, III, President



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