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December 26, 1997

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

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RECEIVED
DOL-10001

RE: Velvac, Incorporated Stock Equivalency Units Plan

Dear Sir or Madam:

Velvac, Incorporated (the "Company") hereby files this statement pursuant to 20 C.F. R. §§2520.104-23. The Company's address is 2900 S. 160 Street, New Berlin, WI 53151, and the Company's EIN is 39-0748061.

Velvac, Incorporated adopted on November 18, 1997, the above-entitled Plan, which constitutes a plan that is unfunded and is maintained primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees of the Company (a "top-hat plan"). The Plan currently covers one employee. The Company currently maintains only this one top-hat plan.

This information is provided for the purpose of meeting the alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of the Employee Retirement Income Security Act of 1974, was set forth at 29 C.F.R. §2520.104-23. If any questions arise regarding this filing, please contact the undersigned at the above address.

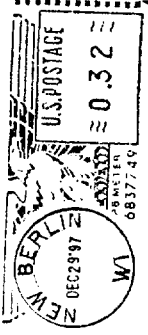
Very truly yours,



Gwendolyn B. Greeler
President

VELVAC INC.

2900 S. 160th STREET
NEW BERLIN, WI 53151-3606



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