



2520042390017

July 17, 1997

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

PENSION AND WELFARE
BENEFIT PLAN SERVICES
97 JUL 23 AM 10:19
PROGRAM SERVICES

Re: Notice of Plan of Deferred Compensation

Gentlemen:

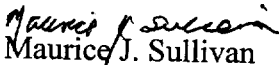
Pursuant to DOL Reg. §2520.104-23, the undersigned Employer hereby files the following information with respect to its plan of deferred compensation.

- Name and Address of Employer:

FOODLAND SUPER MARKET, LTD.
3536 Harding Ave., #100
Honolulu, HI 96816
- Federal Employer Identification Number (EIN) assigned by the IRS:

99-0068548
- The Employer maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
- Two (2) employees are covered by such plan.

Very truly yours,


Maurice J. Sullivan
Chairman of the Board
Foodland Super Market, Ltd.

cc: Andrew Hart, Schoenke & Assoc. (via fax 301-916-7500)