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THE COLUMBUS DISTRIBUTING COMPANY
4949 Freeway Drive East
Columbus, Ohio 43229
614/846-1000

DOL-PWBA
PUBLIC DISCLOSURE
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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

Subject: The Columbus Distributing Company
EIN: 31-4374525

Gentleman:

This statement is filed with you in compliance with Section 2520.104.23 of Title 29 of the Code of Federal Regulations. The undersigned employer, an Ohio Corporation, hereby declares to you that it has entered into an employment agreement with one of the corporation's executives who is part of a select group of management or highly compensated employees. This agreement was made effective as of January 1, 1997.

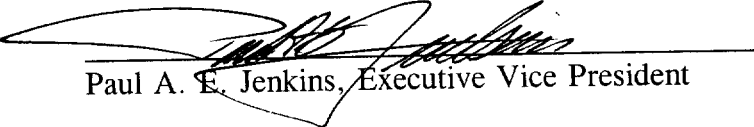
The executive referenced above is the only employee of the corporation who will participate in or receive benefits from the employment agreement.

The undersigned will furnish copies of the employment agreement to the Secretary of Labor upon his request as required by Section 104(a)(1) of ERISA.

Please acknowledge receipt of this filing by date-stamping the enclosed copy of this filing and returning it in the enclosed self-addressed stamped envelope.

Sincerely,

THE COLUMBUS DISTRIBUTING COMPANY


Paul A. E. Jenkins, Executive Vice President