

2520042390786

**NOVINGER GROUP, INC. DEFERRED COMPENSATION PLAN  
TOP-HAT PLAN EXEMPTION STATEMENT**

1. Employer Name and Address: Novinger Group, Inc.  
P.O. Box 60186  
Harrisburg, PA 17106-0186
2. IRS Employer Identification Number: 23-2454580
3. The employer maintains the top-hat plan primarily for the purpose of providing deferred compensation for a "select group of management or highly compensated employees" as such term is used in Section 201(2) of ERISA.
4. This plan is the only top-hat plan maintained by the employer.
5. Eight employees currently participate in the top-hat plan.

**MCNEES, WALLACE & NURICK**

ATTORNEYS AT LAW

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PUBLIC DISCLOSURE  
00 MAY 10 AM 11:50

STEPHEN R. KERN

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E-MAIL ADDRESS: SKERN@MWN.COM

May 4, 2000

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

Re: Novinger Group, Inc. Deferred Compensation Plan

Dear Sir or Madam:

Enclosed is the statement required under Department of Labor Reg. Section 2520.104-23 to satisfy the otherwise applicable reporting and disclosure obligations under Part 1 of Title I of ERISA.

Please acknowledge receipt of this alternative method of compliance by time-stamping and returning the enclosed copy of this letter and the statement in the envelope provided. If you have any questions regarding the contents of this statement, please contact the undersigned.

Sincerely yours,

MCNEES, WALLACE & NURICK

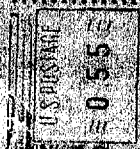
By 

Stephen R. Kern

SRK/ama

Enclosures

cc: Mr. Patrick Hospodavis (w/ enclosure)



**First Class Mail**

TOP HAT PLAN EXEMPTION  
PENSION AND WELFARE BENEFITS  
ADMINISTRATION  
ROOM N-5644  
US DEPARTMENT OF LABOR  
200 CONSTITUTION AVENUE NW  
WASHINGTON DC 20210

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MEMBERSHIP SERVICES  
MERRILL LYNCH PIERCE FENNER & SMITH