

LAW OFFICES OF

CLIFFORD, FIELD, KRIER, MANNING, GREAK & STONE, P.C.

A PROFESSIONAL CORPORATION

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October 26, 1998

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: Gebo Distributing Company, Inc. Supplemental Retirement
Benefits Agreement

Gentlemen:

Please find enclosed the statement which is being filed as an
alternative method of compliance under Department of Labor Reg.
\$2520.104-23 for the above referenced unfunded plan.

Sincerely yours,

Kimberly Wilkerson

KW/gf
Enclosure
cc: Michael J. McCarthy

gebos - ltr to dol re sup ret benefits agmt

GEBO DISTRIBUTING COMPANY, INC.
P. O. BOX 850
PLAINVIEW, TEXAS 79072

OCTOBER 23, , 1998

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: Gebo Distributing Company, Inc. Supplemental Retirement
Benefits Agreement

Gentlemen:

On OCTOBER 19, , 1998, Gebo Distributing Company, Inc. entered into the Gebo Distributing Company, Inc. Supplemental Retirement Benefits Agreement. This statement is being filed as an alternative method of compliance under Department of Labor Reg. \$2520.104-23 for this unfunded plan maintained for a select group of management or highly compensated employees.

1. Name, Address and Employer Identification Number of the Employer:

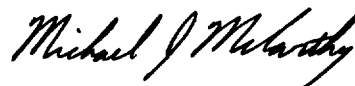
Gebo Distributing Company, Inc.
P. O. Box 850
Plainview, Texas 79072
EIN: 75-1079959

2. The Employer maintains this Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

3. This is one plan, and the only such plan maintained by the Employer. The number of employees covered by this plan is 1.

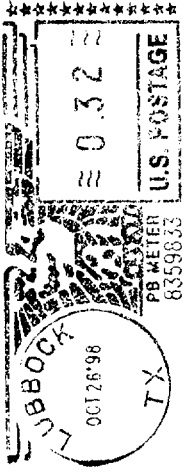
We would be happy to provide copies of any plan documents which you might request as required by Section 104(a)(1) of the Employee Retirement Income Security Act of 1974.

Sincerely yours,



cc: Kimberly Wilkerson

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