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A. J. HOLLY & SONS, LTD

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January 28, 2000

Secretary of Labor
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

Ladies and Gentlemen:

The following statement is submitted pursuant to DOL Reg. §2520.104-23:

A. J. Holly & Sons, Ltd., EIN 39-1218882, located at P. O. Box 254, Waupaca, Wisconsin 54981, maintains three (3) plans, each with one employee, primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Sincerely,

A. J. HOLLY & SONS, LTD.

R. Michael Jungers III

R. Michael Jungers III
Secretary-Treasurer



