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U.S. DEPT. OF LABOR  
PUBLIC DISCLOSURE  
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May 18, 2001

**Via Certified Mail/Return Receipt Requested  
No. Z 173 221 692**

Top Hat Plan Exemption  
Pension and Welfare Benefits Administration  
Room N 5644  
United States Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

**SIMCO MANAGEMENT CORP.**

**REPORTING AND DISCLOSURE COMPLIANCE  
STATEMENT**

In compliance with Section 110 of the Employee Retirement Income Security Act of 1974 ("ERISA") and the Regulations thereunder, found in Section 2520.104 - 23, Simco Management Corp. ("SIMCO") is filing this Reporting and Disclosure Compliance Statement and in connection herewith, provides the following information:

**EMPLOYER:** Simco Management Corp.

**ADDRESS:** 709 Trumbull Avenue  
Girard, OH 44420

**EMPLOYER  
IDENTIFICATION  
NUMBER:** 34-1005255

**PLAN NAME:** Deferred Compensation Agreement


**NUMBER OF PLANS:** One (1)

**NUMBER OF  
EMPLOYEES  
PARTICIPATING  
IN EACH PLAN:** Three (3)

SIMCO maintains the above-named unfunded Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

SIMCO will provide the Plan documents to the Secretary of Labor upon request, as required by Section 104(a)(1) of ERISA.

**SIMCO MANAGEMENT CORP.**  
As Plan Administrator:

By:   
Charles W. Masters, Treasurer

