

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

Dear Sir/Madam:

In compliance with the requirements of the alternative method of reporting and disclosure under Part 1 of Title I of the Employee Retirement Income Security Act of 1974 for unfunded or insured pension plans for a select group of management or highly compensated employees, specified in Department of Labor Regulations, 29 C.F.R. § 2520.104-23, the following information is provided by the undersigned employer.

Name and Address of Employer: Okuma America Corporation
12200 Steele Creek Road
Charlotte, NC 28273

Employer Identification No.: 11-2670887

Statement of Purpose: The Okuma America Corporation maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Number of Plans and
Participants in Each Plan: One plan covering 5 employees

Dated August 13, 1999

OKUMA AMERICA CORPORATION

By



Thomas E. Bell

ROBINSON, BRADSHAW & HINSON, P.A.

ATTORNEYS AT LAW

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CHARLOTTE, NORTH CAROLINA 28246

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