

2520032065590

Sequa Corporation

SEQUA MEMORANDUM

To:

CERTIFIED MAIL

From:

Date:

January 30, 1991

Subject:

Division of Reports
U. S. Department of Labor
200 Constitution Avenue N.W.
Washington, DC 20210

Re: Sequa Corporation Top Hat Plans
EIN: 131885030

Gentlemen:

Sequa Corporation is hereby filing with the Secretary of Labor the statement required by Department of Labor Regulation 2520.104-23, regarding alternative compliance with the reporting and disclosure requirements of ERISA.

Sequa maintains three plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. These plans were adopted on October 25, 1990 and are effective retroactively to January 1, 1990.

As of January 1, 1990, the plans cover employees as follows:

SERP I - 64

SERP II - 32

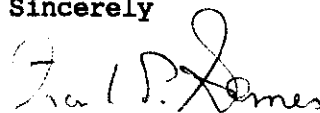
SERP III - 8

Our name, address, and EIN are:

Sequa Corporation
Three University Plaza
Hackensack, New Jersey 07601

EIN: 131885030

Sincerely



Frank P. Gomes
Manager, Employee Benefits

FPG:er