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October 16, 1995

Top Hat Plan Exemption  
Pension and Welfare Benefits Administration  
Room N-5644  
**US Department of Labor**  
200 Constitution Ave. NW  
Washington, DC 20210

DOL-PWBA  
PUBLIC DISCLOSURE  
55 OCT 26 AM 10:41

*Re: Supplemental Executive Retirement Plan*

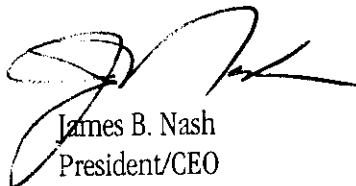
To Whom It May Concern:

Allow this letter to serve as a declaration of the following: Ira Thomas Associates, Inc. (EIN-34-1535100), 5121 Mahoning Avenue, Youngstown, Ohio 44515, has established a non-qualified supplemental executive retirement plan effective July 1, 1995.

The plan is being maintained primarily for the purpose of providing deferred compensation to a select group of managers.

There is one plan, and three employees are participants.

Sincerely,



James B. Nash  
President/CEO

JBN/lpm

**IRA THOMAS ASSOCIATES INC**

Marketing Communications