

ARNOLD GALLAGHER SAYDACK
PERCELL ROBERTS & POTTER
A Professional Corporation

ATTORNEYS AT LAW

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E-Mail: wpotter@agsprp.com

2520140933618

U.S. DEPT. OF LABOR
PWBA/PUBLIC DISCLOSURE
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Correspondence:
P.O. Box 1758
Eugene, OR 97440-1758

WILLIAM R. POTTER

August 25, 2005

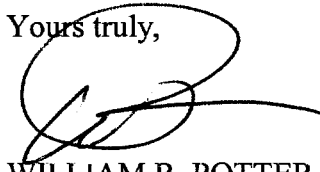
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Top Hat Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, D.C. 20120

RE: Swanson Group, Inc.; Krauss
Our File No. 15273-0106

Pursuant to 29 CFR § 2520.104-23(b), enclosed is an original statement regarding the Swanson Group, Inc. Incentive Compensation Plan.

Yours truly,



WILLIAM R. POTTER

WRP:mab

Enclosure

cc: Swanson Group, Inc.

N:\P - T\Swanson Group 15273\Krauss Deferred Comp Plan 15273-106\Ltr DOL 082505.doc

29 CFR § 2520.104-23(b) STATEMENT

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

Pursuant to 29 CFR § 2520.104-23(b), the following statement is made:

The name and address of the employer: Swanson Group, Inc.
P.O. Box 250
Glendale, Oregon 97442-0250

The employer identification number assigned by the Internal Revenue Service: 93-0475444

Declaration: Swanson Group, Inc., the employer, maintains a plan or plans primarily for the purpose of providing incentive compensation for Cameron Krauss who is part of a select group of management or highly compensated employees

The number of such plans: There is one such plan: Swanson Group, Inc. Incentive Compensation Agreement

The number of employees in each: There is one employee in the Swanson Group, Inc. Incentive Compensation Agreement

SWANSON GROUP, INC.

Date: 8/19, 2005

By Steven D. Swanson
Steven D. Swanson, President

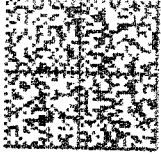
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200 Constitution Avenue N.W.
Washington, D.C. 20540

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ARNOLD GALLAGHER SAYDAK

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WILLIAM R. POTTER

August 25, 2005

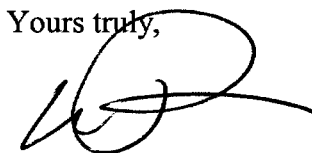
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Top Hat Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, D.C. 20120

RE: Swanson Group, Inc.; Landau
Our File No. 15273-0108

Pursuant to 29 CFR § 2520.104-23(b), enclosed is an original statement regarding the Swanson Group, Inc. Incentive Compensation Plan.

Yours truly,



WILLIAM R. POTTER

WRP:mab

Enclosure

cc: Swanson Group, Inc.

N:\P - T\Swanson Group 15273\Landau Deferred Comp 15273-108\ltr DOL 082505.doc

29 CFR § 2520.104-23(b) STATEMENT

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

Pursuant to 29 CFR § 2520.104-23(b), the following statement is made:

The name and address of the employer: Swanson Group, Inc.
P.O. Box 250
Glendale, Oregon 97442-0250

The employer identification number assigned 93-0475444
by the Internal Revenue Service:

Declaration: Swanson Group, Inc., the employer, maintains a plan or plans primarily for the purpose of providing incentive compensation for Don Hardwick who is part of a select group of management or highly compensated employees

The number of such plans: There is one such plan: Swanson Group, Inc. Incentive Compensation Agreement

The number of employees in each: There is one employee in the Swanson Group, Inc. Incentive Compensation Agreement

SWANSON GROUP, INC.

Date: 8/19, 2005

By Steven D Swanson
Steven D. Swanson, President

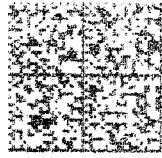
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WILLIAM R. POTTER

August 25, 2005

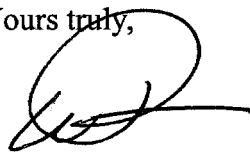
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Top Hat Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, D.C. 20120

RE: Swanson Group, Inc.; Hennessey
Our File No. 15273-0107

Pursuant to 29 CFR § 2520.104-23(b), enclosed is an original statement regarding the Swanson Group, Inc. Incentive Compensation Plan.

Yours truly,



WILLIAM R. POTTER

WRP:mab

Enclosure

cc: Swanson Group, Inc.

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29 CFR § 2520.104-23(b) STATEMENT

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

Pursuant to 29 CFR § 2520.104-23(b), the following statement is made:

The name and address of the employer: Swanson Group, Inc.
P.O. Box 250
Glendale, Oregon 97442-0250

The employer identification number assigned by the Internal Revenue Service: 93-0475444

Declaration: Swanson Group, Inc., the employer, maintains a plan or plans primarily for the purpose of providing incentive compensation for Tim Hennessey who is part of a select group of management or highly compensated employees

The number of such plans: There is one such plan: Swanson Group, Inc. Incentive Compensation Agreement

The number of employees in each: There is one employee in the Swanson Group, Inc. Incentive Compensation Agreement

SWANSON GROUP, INC.

Date: 8/19, 2005

By Steven D Swanson
Steven D. Swanson, President

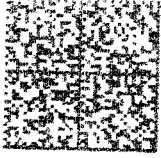
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200 Constitution Avenue N.W.
Washington, D.C.**

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Correspondence:
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WILLIAM R. POTTER

August 25, 2005

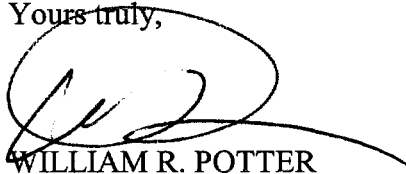
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Top Hat Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, D.C. 20120

RE: Swanson Group, Inc.; Hardwick
Our File No. 15273-0105

Pursuant to 29 CFR § 2520.104-23(b), enclosed is an original statement regarding the Swanson Group, Inc. Incentive Compensation Plan.

Yours truly,



WILLIAM R. POTTER

WRP:mab

Enclosure

cc: Swanson Group, Inc.

N:\P - T\Swanson Group 15273\Hardwick Deferred Comp 15273-105\Ltr DOL 082505.doc

29 CFR § 2520.104-23(b) STATEMENT

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

Pursuant to 29 CFR § 2520.104-23(b), the following statement is made:

The name and address of the employer: Swanson Group, Inc.
P.O. Box 250
Glendale, Oregon 97442-0250

The employer identification number assigned by the Internal Revenue Service: 93-0475444

Declaration: Swanson Group, Inc., the employer, maintains a plan or plans primarily for the purpose of providing incentive compensation for Robert Landolt who is part of a select group of management or highly compensated employees

The number of such plans: There is one such plan: Swanson Group, Inc. Incentive Compensation Agreement

The number of employees in each: There is one employee in the Swanson Group, Inc. Incentive Compensation Agreement

SWANSON GROUP, INC.

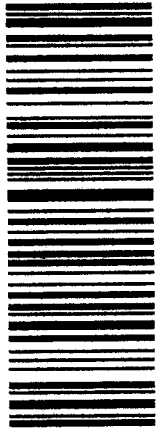
Date: 8/19, 2005

By Steven D Swanson
Steven D. Swanson, President

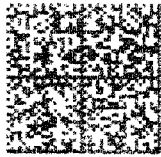
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