



DOL-PHSA
200-700-1000
97-000-000 3:18

April 1, 1997

Top Hat Plan Exemption
U. S. Department of Labor
Room N-5644
Pension and Welfare Benefits Administration
200 Constitution Avenue N.W.
Washington, D. C. 20210

2520032030139

Re: S.B. Foot Tanning Company

Dear Sir/Madam:

In compliance with the requirements of the alternative method of reporting and disclosure under Part I of Title I of the Employee Retirement Income Security Act of 1974 for unfunded pension plans covering 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 S.B. Foot Tanning Company:

Name and Address of Employer: S.B. Foot Tanning Company
805 Bench Street
Red Wing, MN 55066

Employer Identification Number: 41-0261210

S.B. Foot Tanning Company has established a plan effective March 1, 1997 primarily for the purpose of providing deferred compensation for select management and highly compensated employees, to be known as the S.B. Foot Tanning Company Supplemental Executive Retirement Plan. At the present, one employee is covered under the plan.

Yours very truly,

Thomas W. Yoemans
Treasurer