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May 30, 1997

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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

To Whom It May Concern:

Re: Palace Sports & Entertainment Long-Term Incentive Compensation Plan

Pursuant to the alternative compliance method provided in DOL Reg. §2520.104-23(b)(1) and (2), Palace Sports & Entertainment hereby files this statement with the Secretary of Labor:

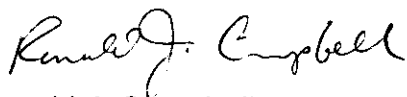
Name & Address of Employer	Palace Sports & Entertainment Two Championship Drive Auburn Hills, MI 48326
Employer's federal employer identification number, as assigned by the Internal Revenue Service	38-2670394
A declaration that the employer maintains a plan or plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees	Palace Sports & Entertainment maintains a plan ("Palace Sports & Entertainment Long-Term Incentive Compensation Plan") primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees
A statement of the number of such plans and the number of employees in each.	There is one plan, with approximately 10 participants

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This employer understands that it must, and agrees that it will, provide a copy of the plan document to the Secretary upon request, pursuant to ERISA §104(a)(1).

Sincerely,

PALACE SPORTS & ENTERTAINMENT



Ronald J. Campbell
Executive
Vice President

cc: C. Castillo (Guardian)