

One Financial Way
Cincinnati, Ohio 45242



Ohio National
Financial Services

Post Office Box 237
Cincinnati, Ohio 45201-0237
Telephone: 513.794.6100

VIA CERTIFIED MAIL

April 29, 1997

2520032541139

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5638
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, DC 20210

Dear Sir or Madam:

The Ohio National Life Insurance Company, in compliance with Section 104(a) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), and DOL Reg. § 2520.104-23, is filing this Reporting and Disclosure Compliance Statement. The Ohio National Life Insurance Company has provided the following information to comply with the reporting and disclosure requirements under DOL Reg. § 2520.104-23(b)(1) and the Delinquent Filer Voluntary Compliance Program:

Employer Name:	The Ohio National Life Insurance Company
Employer Address:	One Financial Way Cincinnati, OH 45242
Employer Identification No.:	31-0397080
Plan Names:	Deferred Compensation Agreement; Phantom Stock Plan; Executive Officers' and Directors' Voluntary Deferred Compensation Plan; and Supplementary Retirement Plan
No. of Employees Participating in Each Plan:	Deferred Compensation Agreement - 6 employees and 8 directors Phantom Stock Plan - 23 employees and 12 directors Executive Officers' and Directors' Voluntary Deferred Compensation Plan - 6 employees and 6 directors Supplementary Retirement Plan - 31 employees and no directors


Top Hat Plan Exemption
April 29, 1997
Page 2

The Ohio National Life Insurance Company maintains the Phantom Stock Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees and directors. The Ohio National Life Insurance Company will provide the Plan documents to the Secretary of Labor upon request, as required by ERISA § 104(a)(1) and DOL Reg. § 2520.104-23(b)(2).

In compliance with the Delinquent Filer Voluntary Compliance Program, The Ohio National Life Insurance Company has filed the first page of the Form 5500, Annual Report, with the Department of Labor and has paid the \$2,500 penalty amount for the Phantom Stock Plan. The Ohio National Life Insurance Company respectfully requests that the Department of Labor accepts this letter as satisfying the Company's reporting and disclosure obligation under Part 1 of Title I of ERISA for the Phantom Stock Plan. If you have any questions about this filing, please feel free to contact me.

Sincerely,

The Ohio National Life Insurance Company
as Plan Administrator



Stuart G. Summers
Vice President and General Counsel

cc: Ronald A. Bell, Esq.

tophat2

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June 5, 1997

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

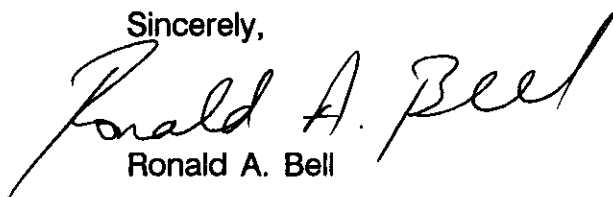
Re: The Ohio National Life Insurance Company Phantom Stock Plan

Dear Sir or Madam:

Enclosed please find the Top Hat Exemption Letter for The Ohio National Life Insurance Company Phantom Stock Plan in compliance with the Department of Labor's Delinquency Filer Voluntary Compliance Program.

If you have any questions, please feel free to contact me.

Sincerely,



Ronald A. Bell

RB/AVA/pm
Enclosures

c: Stuart G. Summers, Esq.
Charles D. Lindberg, Esq.
Jerold A. Fink, Esq.

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RB-AVA