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**Surplus Insurance Brokers Agency, Inc.**  
**P.O. Box 749**  
**South Bend, Indiana 46624-0749**  
April 30, 1997

Top Hat Plan Exemption  
Pension and Welfare Benefits Administration  
Room N-5644  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, D.C. 20210  
Certified Mail, Return Receipt Requested

To the Secretary of Labor:

In compliance with the requirements of the alternative method of reporting and disclosure under Part 1 of Title I of the Employee Retirement Income Security Act of 1974 for unfunded pension plans for 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 the undersigned employer.

Name and address of Employer: Surplus Insurance Brokers Agency, Inc.  
P.O. Box 749  
South Bend, Indiana 46624-0749

Employer Identification No.: 35 137 24 23

Surplus Insurance Brokers Agency, Inc. maintains plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Number of Plans and  
Participants in Each Plan: 1 Plan covering 1 employee.

Surplus Insurance Brokers Agency, Inc. will provide the plan document to the Secretary of Labor upon request, as required by ERISA.

Surplus Insurance Brokers Agency, Inc.

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By:

  
Richard F. Urbanski, President

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