

**ULLICO Inc.**111 Massachusetts Ave., N.W.
Washington, DC 20001

202/682-0900

U.S. DEPARTMENT OF LABOR
OFFICE OF PUBLIC DISCLOSURE
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April 5, 2002

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

RE: ULLICO Inc. Non-Qualified Deferred Compensation Plan

Dear Secretary:

Pursuant to Section 2520.104-23 of the Department of Labor's (DOL) Regulations, this letter will serve as notice that, with respect to the ULLICO Inc. Non-Qualified Deferred Compensation Plan (the "Plan"), the undersigned intends to utilize the alternative form of compliance with the reporting and disclosure requirements of Part 1 of Title I of the Employee Retirement Income Security Act of 1974 ("ERISA"), which alternative form of compliance is provided in the aforesaid Regulations Section.

Pursuant to DOL Regulations, Section 2520.104-23(b), the following information is provided:

1. Name and Address of Employer:

ULLICO Inc.
111 Massachusetts Avenue, NW
Washington, DC 20001

2. Employer's Employer Identification Number:

52-1579726

3. The Employer hereby declares that it maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
4. The employer hereby states that it maintains only the Plan for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The Plan is expected to cover 4 employees

Pursuant to DOL Regulations, Section 2520-104-23(b)(2), the Employer will provide Plan documents, if any to the Secretary of Labor upon request as required by Section 104(a)(1) of ERISA.

Very truly yours,

By: 

Print Name: Joseph A. Carabillo

Print Title: V.P., C.L.O., Vice President

Date: 4/5/02

