



300 East Main Street,  
Suite 501  
Lexington, KY 40507  
Phone (606) 255-1154  
FAX (606) 255-7664

Employer  
Retirement  
Administration  
Services

1601 Citizens Plaza  
500 West Jefferson Street  
Louisville, KY 40202-2826  
Phone (502) 584-6714  
FAX (502) 584-4960

U.S. DEPARTMENT OF LABOR

2520032900015

December 30, 1999

Office of Pension and Welfare Programs  
Labor Management, Services Administration  
U.S. Department of Labor  
Washington, D.C. 20216

Re: Brandstetter Carroll, Inc. Nonqualified Retirement Plan *61011570*

Dear Sir or Madam:

This statement is with respect to the nonqualified deferred compensation plan maintained by our client, Brandstetter Carroll, Inc. under the requirements of 29 CFR Section 2520.104.23(a). Our client currently maintains the above-referenced Plan to provide deferred compensation for two Executives who are members of a "select group of management" or who are "highly compensated."

Sincerely,  
ERAS, LLC

*A. Michael Marx*

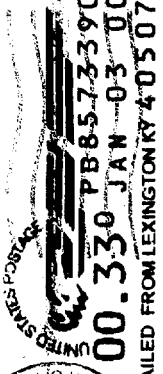
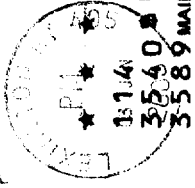
A. Michael Marx  
Chief Operating Officer

*1/2*



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