

U.S. DEPT. OF LABOR
P2577 PUBLIC DISCLOSURE
02 MAY 20 PM 2:25

Top Hat Plan Exemption
Pension & Welfare Benefits Administration
Room N-5644
United States Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210

2520032901153

Re: Statement under DOL Reg. §2520.104-23

Ladies/Gentlemen:

This is to declare the undersigned has established a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. This is the only such plan maintained by the undersigned and there are currently 3 employees participating in this plan.

The Employer Identification Number & address of the undersigned are as follows:

EIN: 94-2395744
Address: 3089 WHIPPLE RD.
UNION CITY, CA 94587

Upon request, the undersigned will provide the plan document as required by Section 104(a) (1) of ERISA.

Sincerely,

WINWARD INTERNATIONAL INC
Print Employer Name

By: [Signature]
Signature

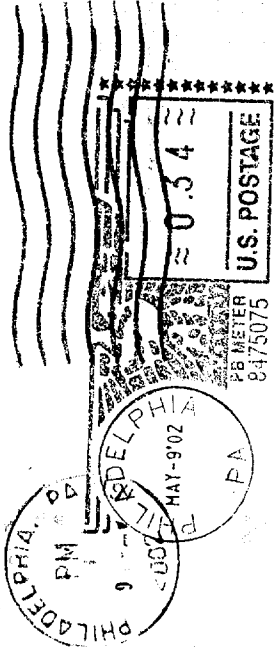
Title GENERAL MANAGER

Dated: 02-22-02

BCG

THE BENEFIT CONSULTANTS GROUP
3275 Stokley Street, Philadelphia, PA 19129-1199

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