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December 21, 1992

GENERAL MANAGER
DOUGLAS J. HOLTZ

2520032903189

Certified Mail - Return Receipt Requested

Pension and Welfare Benefits Administration
P.O. Box 75212
Washington DC 20013-5212

Top Hat Plan Filing Under Civil Penalty Relief Program

Re: A plan of deferred compensation sponsored by Mid-Pacific Country Club (the "Employer")

Dear Sir or Madam:

19068

In accordance with Pension and Welfare Benefits Administration (PWBA) Notice on Civil Penalty Relief for Top Hat Plans, Late Filers, as published in the Federal Register on July 24, 1992 (57 FR 33019), the following information is disclosed and the accompanying payment is being made to the U.S. Department of Labor (DOL) in order to comply with the reporting and disclosure requirements of the Employee Retirement Income Security Act of 1974 (ERISA), under the alternative method of compliance as set forth by DOL Regulation §2520.104-23.

1. The above referenced Employer maintains a plan of deferred compensation in the form of the Club Managers Association of America Master Deferred Compensation Plan pursuant to Section 457 of the Internal Revenue Code (the "Plan").
2. The address of the Employer is: 266 Kaelepulu Drive, Kailua HI 96734.
3. The employer identification number of the Employer is 99-0048359.
4. The Employer maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
5. The number of employees in the Plan is two.

PWBA

-2-

December 21, 1992

If you require a copy of the plan document or any additional information, please do not hesitate to contact the undersigned.

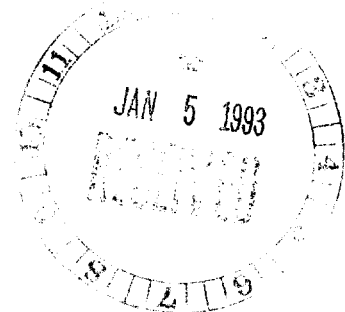
MID-PACIFIC COUNTRY CLUB
(808) 262-8161


By Douglas J. Holtz
General Manager

cl

Enclosure

19,068



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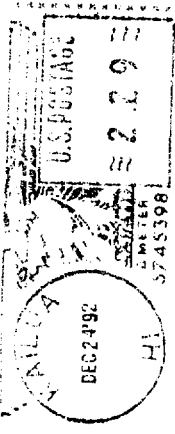
CERTIFIED

P 660 319 90J

MAIL



266 KAELEPULU DRIVE
KAILUA, HAWAII 96734



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Pension and Welfare Benefits Administration
P.O. Box 75212
Washington DC 20013-5212

