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H HARBOR GROUP

REAL ESTATE

Commerce Building
500 Crawford Street, Suite 101
P.O. Box 1304
Portsmouth, Virginia 23705

Telephone:(804)393-2977
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September 25, 1991

Office of Employee Benefits Security
Labor Management Service Administration
U.S. Department of Labor
Washington, DC 20216

Re: Reporting and Disclosure Requirements - Part I of Title I of ERISA for deferred compensation plans maintained for a select group of management or highly compensated employees as outlined in Re. Sec. 2520.104-23. _____

Harbor Group Commercial Real Estate Corporation
500 Crawford Street, Suite 101
Portsmouth, VA 23704
Employer I.D. # 54-1329081

Declaration: The employer maintains 2 plans primarily to provide deferred compensation to a select group of management or highly compensated employees.

Effective Date
of Plan

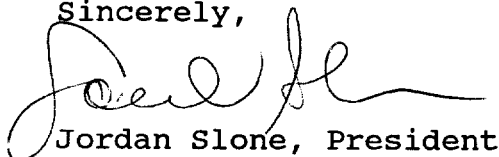
Number of
Covered Employees

October 1, 1991

2

Please confirm receipt of this declaration by returning a copy in the enclose, self-addressed envelope.

Sincerely,


Jordan Slone, President

JS/lk

