

PACIFIC GUARDIAN LIFE

2520040152637

Douglas M. Goto
Executive Vice President

January 19, 1995

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

DOJ-PWPB
RECEIVED
99 FEB 29 PM 0:26

Re: Top Hat Plan Exemption

Gentlemen:

This notice is intended to comply with Regulation 2520.104-23 as the alternative method of compliance to meet the reporting and disclosure requirements of Part 1 of Title 1 of ERISA with respect to the Pacific Guardian Life Insurance Company, Ltd. Supplemental Executive Retirement Plan.

The required information is:

1. Name and Address of Employer

Pacific Guardian Life Insurance Company, Ltd.
1440 Kapiolani Boulevard, Suite 1700
Honolulu, Hawaii 96814

2. Employer Identification Number

99-0108050

3. Declaration

The Pacific Guardian Life Insurance Company, Ltd. Supplemental Executive Retirement Plan is maintained primarily for the purpose of providing deferred compensation to a select group of management or highly compensated employees.

Top Hat Plan Exemption

January 19, 1995

Page 2

4. Number of Such Plans and Number of Employees in Each

The only such supplemental plan is the plan described herein, the Pacific Guardian Life Insurance Company, Ltd. Supplemental Executive Retirement Plan, which has five participants.

Should you require a copy of the plan document or additional information, please let us know.

Sincerely,

PACIFIC GUARDIAN LIFE
INSURANCE COMPANY, LIMITED

By: 

Douglas M. Goto

Its: Executive Vice President

DMG/cc