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February 12, 1996

**CERTIFIED MAIL - # Z 381 975 071**  
**RETURN RECEIPT REQUESTED**

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

To the Secretary of Labor:

In order to comply with the requirements of the alternative reporting and disclosure method under ERISA, Title 1, Part 1, as provided for an unfunded or insured pension plan for a select group of management or highly compensated employees in DOL Reg. §2520.104-23, the following information is provided by the undersigned on behalf of the plan administrator:

- (1) The name of the plan sponsor is:

Wine World Estates Company

- (2) The mailing address of the plan sponsor is:

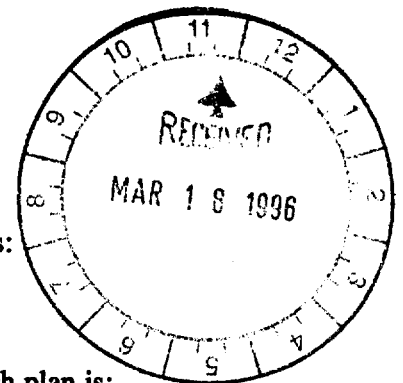
2000 Main Street  
Box 111  
St. Helena, California 94574

- (3) The plan sponsor's Federal Identification Number (EIN) is:

94-2227626

- (4) The number of plans and the number of participants in each plan is:

The plan sponsor has one plan, the Wine World Estates Company Executive Savings Plan, signed January 1, 1996, which covers 10 employees.

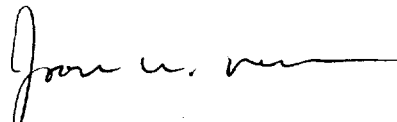


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The above-named sponsor maintains this plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The plan sponsor will provide a copy of the agreement to the Secretary of Labor upon request.

Very truly yours,

THOMPSON & MITCHELL

By   
Joan M. Newman

JMN/dd

cc: Steven E. Brown

