



02/02/2004

2520040763376

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5638
United States Department of Labor
200 Constitution Avenue, N.W.
Washington, D C 20210

Dear Sir or Madam:

In order to comply with the requirements of the alternative reporting and disclosure method under ERISA, Parts 1, Title 1, as provided for an unfunded plan for a select group of management or highly compensated employees in the D.O.L. Regulation 2520.104-23 the following information is provided:

1. The name of the employer is:
Counter Culture Coffee, Inc.
2. The mailing address of the employer is:
4911 S. Alston Ave.
3. The employer's federal identification number (EIN) is:
56-1907086
4. The number of plans and the number of participants in each plan is:
1 plan covering 1 employee. The above named employer maintains this plan primarily for the purpose of providing deferred compensation benefits to a select group of management or highly compensated employees.

The employer will send a copy of all plan documents and agreements to the Secretary, upon request.

Respectfully submitted,

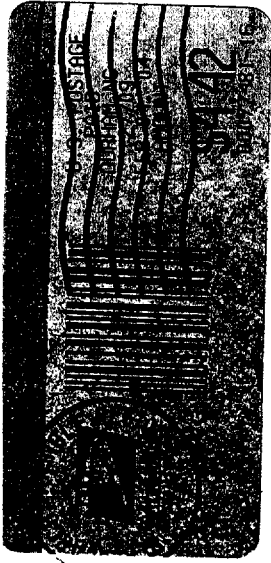
Brett R. Smith
President



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PENSION AND WELFARE BENEFITS ADMIN.
ROOM N - 5638
UNITED STATES DEPARTMENT OF LABOR
200 CONSTITUTION NW
WASHINGTON DC 20210

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