

PORTLAND COUNTRY CLUB
11 FORESIDE ROAD
FALMOUTH, MAINE 04105-1797

2520040184127

December 30, 1992

Pension and Welfare Benefits Administration
U.S. Department of Labor
P.O. Box 75212
Washington, DC 20013-5212

Dear Sir or Madam:

In accordance with Department of Labor Sec. 2520.104-23, Portland Country Club, located at 11 Foreside Road, Falmouth, Maine 04105 and assigned EIN 01-0142660 by the Internal Revenue Service, hereby declares that it maintains two plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensation employees. The number of employees covered under each plan is as follows:

<u>Plan Name</u>	<u>Number of Employees</u>
Garrett Fitzgerald Deferred Compensation Agreement	1
Lloyd Ruby Deferred Compensation Agreement	1

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Portland Country Club is hereby taking advantage of the Department of Labor Amnesty Program. Enclosed is our check for \$1,000.00, in full satisfaction of all penalties for failure to file or late filing with respect to these plans.

The filing of this statement is intended solely to comply with Reg. Sec. 2520.104-23 to the extent it applies, and may not, by itself, be treated as an admission by Portland Country Club that the arrangement described herein are "employee pension benefit plans" subject to the Employee Retirement Income Security Act of 1974, as amended.

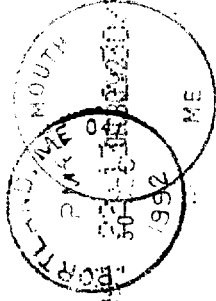
Respectfully submitted,
Portland Country Club


Kenneth V. Moody, Office Manager

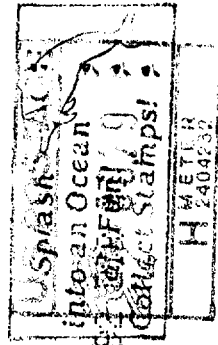
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