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*Graeber,
Simmons
& Cowan*

AUSTIN

HOUSTON

SAN ANTONIO

SAN JOSE

100 Congress Ave.
Suite 100
Austin, Texas
78701
512/477-9417
Fax 512/477-9675

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

FROM: Graeber, Simmons & Cowan, Inc.
Employer Identification Number: 74-1997115
100 Congress Avenue, Suite 100
Austin, Texas 78701

September 1, 1999

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This document constitutes the statement required by 29 C. F. R. Sec. 2520 104-23 (a) (1) to be filed with the Secretary of Labor in respect to a Non-Qualified Deferred Compensation Plan maintained by the above employer.

The employer currently maintains one Non-Qualified Deferred Compensation Plan for employees who are members of a select group of management or who are highly compensated. There are currently seven participants in the plan. A copy of the plan document will be furnished upon request.

Respectfully submitted,

Martha Hearn

Martha Hearn
Graeber, Simmons & Cowan, Inc.