

2520042391752

**THE BURTON CORPORATION**

80 Industrial Parkway  
PO Box 4449  
Burlington, VT 05406

March 4, 1999

Office of Employment Benefits Security  
Labor-Management Services Administration  
US Department of Labor  
Washington, DC 20216

Re: John Burton Carpenter Irrevocable Life Insurance Trust  
EIN# 03-6055824

Dear Mr. Secretary:

This corporation currently has an employee benefit plan primarily established and maintained for the purpose of providing a split-dollar insurance plan to a select group of highly compensated employees.

Number of employees participating in this plan: One (1)

The pertinent employer data is as follows:


Employer: Burton Corporation  
80 Industrial Parkway  
PO Box 4449  
Burlington, VT 05406  
(802) 862-4500

Employer Identification Number: 03-0269736

This statement is filed under authority of Labor Regulations Section 2520.104-23.

The Burton Corporation

By:

  
duly authorized agent

# THE BURTON CORPORATION

80 Industrial Parkway  
PO Box 4449  
Burlington, VT 05406

March 4, 1999

Office of Employment Benefits Security  
Labor-Management Services Administration  
US Department of Labor  
Washington, DC 20216

Re: John Burton Carpenter and Donna G. Carpenter Insurance Trust  
EIN# 03-6055825

Dear Mr. Secretary:

This corporation currently has an employee benefit plan primarily established and maintained for the purpose of providing a split-dollar insurance plan to a select group of highly compensated employees.

Number of employees participating in this plan: One (1)

The pertinent employer data is as follows:

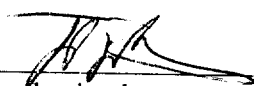
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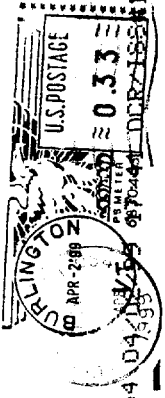
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Washington, DC 20216

