

**TORKILDSON, KATZ, FONSECA, JAFFE,
MOORE & HETHERINGTON**

ATTORNEYS AT LAW, A LAW CORPORATION
700 BISHOP STREET, 15TH FLOOR
HONOLULU, HAWAII 96813-4187
TELEPHONE (808) 523-6000 • FACSIMILE (808) 523-6001

2520042391783

CHARMAINE DeCOSTA
E-MAIL: CD@TORKILDSON.COM

April 1, 1999

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

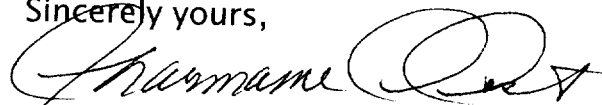
Re: Tony Hawaii Corporation
Statement of Deferred Compensation Plan

Gentlemen:

You are hereby notified, pursuant to Reg. §2520.104-23, that the following employer maintains a plan primarily for the purpose of providing deferred compensation for a select group of management and/or highly compensated employees:

1. Name of Employer: Tony Hawaii Corporation
2. Address of Employer: 98-055 Kamehameha Highway
Aiea, Hawaii 96701
3. EIN of Employer: 99-0223623
4. Number of Plans: one
4. Number of Participants: one
5. Effective Date of Plan: April 1, 1999

Sincerely yours,



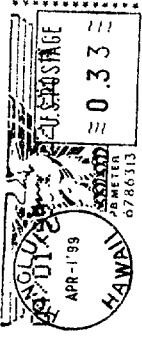
Charmaine DeCosta
Legal Assistant to Roger W. Fonseca

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