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March 30, 1999

Michael A. Laing P.A.
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2520042391899

BY U.S. MAIL

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Re: Alternative Method of Compliance with the Reporting and Disclosure
Requirements as Described in DOL Reg. § 2520.104-23 for a Pension Plan
for Certain Selected Employees

Dear Sir/Madam:

On May 14, 1998, the Board of Directors of Florida Crystals Corporation ("Florida Crystals") adopted the Florida Crystals Corporation Supplemental Executive Retirement Plan (the "Plan"), effective as of January 1, 1998. Pursuant to Department of Labor Regulation § 2520.104-23, the undersigned on behalf of Florida Crystals hereby files the following information with respect to the Plan.

1. Name and Address of Employer:

Florida Crystals Corporation
340 Royal Poinciana Way, Suite 316
Palm Beach, Florida 33480

2. Federal Employer Identification No. (EIN):

65-0773338

3. Certain subsidiaries of Florida Crystals entered into two (2) other arrangements (excluding this Plan) in which compensation is deferred. However, these are individual deferred compensation agreements with two (2) executives and Florida Crystals and its subsidiaries do not consider these individual agreements to be top hat plans. Nonetheless, in order to fully comply with the exception set forth in DOL Reg.

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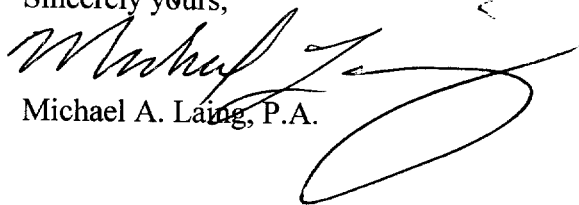
§ 2520.104-23, the names of the agreements and the number of employees covered by each such agreement is as follows:

	<u>Name</u>	<u>Participants</u>
(i)	Deferred Compensation Agreement	1
(ii)	Deferred Compensation Agreement	1

4. Approximately thirteen (13) employees of Florida Crystals and its subsidiaries are covered by this Plan.

Please date-stamp the enclosed copy of this letter "Received" and return it to me for my records in the self-addressed, stamped envelope provided.

Sincerely yours,



Michael A. Laing, P.A.

Enclosures
MIA_1998/483579-2

cc: S. Hannan
A. Tabernilla
D. Carson
O. Hernandez

