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\*\*ADMITTED IN NEW YORK ONLY

June 10, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

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

**Re: Jeff Wilson Pool Services, Inc. Phantom Stock Plan**

Dear Sir/Madam:

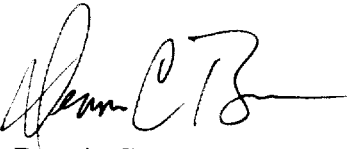
In accordance with Department of Labor Regulation §2520.104-23(b)(1) we hereby submit the following information:

1. Name and Address of Employer:  
  
Jeff Wilson Pool Service, Inc.  
5365 Jaeger Road  
Naples, Florida 34109
2. Employer Identification Number: 592596150
3. Number of Top Hat Plans: 1
4. Number of Employees in Plan: 1

5. Purpose of the Plan: Jeff Wilson Pool Service, Inc. maintains the Jeff Wilson Pool Service, Inc. Phantom Stock Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Very truly yours,

BOND, SCHOENECK & KING, P.A.

By: 

Dennis C. Brown

DCB/lab

BOND, SCHOENECK & KING, P.A.  
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**CERTIFIED**

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**MAIL**



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