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December 17, 1992

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Pension and Welfare Benefits Administration  
P.O. Box 75212  
Washington, DC 20013-5212

JAN 7 1993

Top Hat Plan Filing Under Civil  
Penalty Relief Program

RE: A plan of deferred compensation sponsored by  
Philadelphia Country Club (the "Employer")

Dear Sir or Madam:

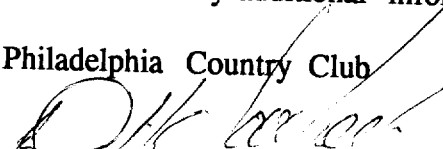
20,969

In accordance with Pension and Welfare Benefits Administration ("PWBA") Notice on Civil Penalty Relief for Top Hat Plans, Late Filers, as published in the Federal Register on July 24, 1992 (57 FR 33019), the following information is disclosed and the accompanying payment is being made to the U.S. Department of Labor (:DOL") in order to comply with the reporting and disclosure requirements of the Employee Retirement Income Security Act of 1974 (ERISA"), under the alternative method of compliance as set forth by DOL Regulation 2520.104-23.

1. The above referenced Employer maintains a plan of deferred compensation in the form of the Club Managers Association of America Master Deferred Compensation Plan Pursuant to Section 457 of the Internal Revenue Code (the "Plan").
2. The address of the Employer is 1601 Spring Mill Road, Gladwyne, PA 19035
3. The employer identification number of the Employer is 23-0969350.
4. The Employer maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
5. The number of employees in the Plan is three (3).

If you require a copy of the plan document or any additional information, please do not hesitate to contact the undersigned.

Philadelphia Country Club

  
By David H. Voorhees  
General Manager

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PHILADELPHIA COUNTRY CLUB  
GLADWYNE, PENNSYLVANIA 19035

**RETURN RECEIPT  
REQUESTED**

Fold at line over top of envelope to the  
right of the return address

**CERTIFIED**

P 257 204 329

**MAIL**

Pension and Welfare Benefits Administration  
P.O. Box 75212  
Washington, DC 20013-5212

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