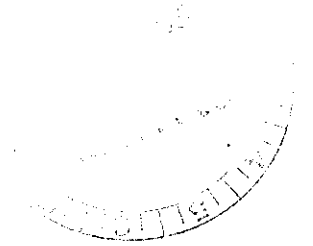


2520190030412

17/1/65





THE UNIVERSITY CLUB

FOURTH AND BROADWAY
CINCINNATI, OHIO 45202

December 14, 1992

Pension and Welfare Benefits Administration
P.O. Box 75212
Washington, D. C. 20013-521

Re: University Club of Cincinnati Deferred Compensation
Top Hat Plan

Gentlemen:

Concurrently with this letter, we are filing the notice remitted under the Civil Penalty Relief procedure described in 57 FR 33019 (July 24, 1992), with the minimum \$1,000.00 penalty. As the above employer who 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"), we are writing to explain why Form 5500 was not filed in a timely manner. However, we assure you that the untimely filing was not intentional or not due to willful neglect of the law. We were never informed by the Club Managers Association which sponsored the plan or Aetna Insurance, which funded the plan with annuities, that this was an ERISA plan requiring reports. We realize that generally ignorance is no excuse, but this penalty works an extreme hardship on the employer. Based upon this, we request abatement of the late filing penalty of \$1,000.00 which is enclosed with this letter.

Thank you for your cooperation. If you have any questions or need additional information, please feel free to contact us.

Sincerely,

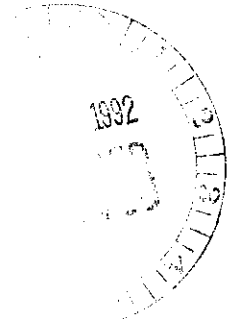
Mary Silbernagel
Business Manager
(513) 721-2600





THE UNIVERSITY CLUB
FOURTH AND BROADWAY
CINCINNATI, OHIO 45202

December 14, 1992



PENSION AND WELFARE BENEFITS ADMINISTRATION
P. O. BOX 75212
WASHINGTON, D. C. 20013-521

Top Hat Plan Filing Under Civil
Penalty Relief Program

RE: A plan of deferred compensation sponsored by
UNIVERSITY CLUB OF CINCINNATI (the "Employer")

Dear Sir:


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: 401 East Fourth Street, Cincinnati, Ohio 45233.
3. The employer identification number of the Employer is 31-0474650.

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 4.

UNIVERSITY CLUB OF CINCINNATI

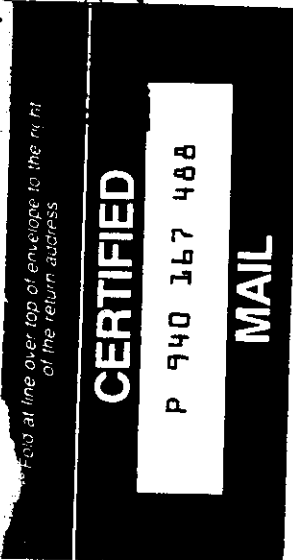


Mary Silbernagel
Business Manager

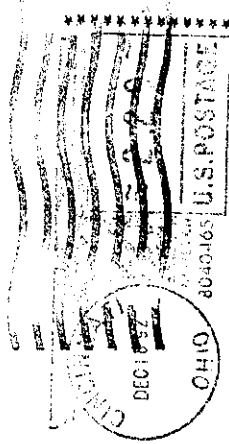




THE UNIVERSITY CLUB
401 E. 4TH STREET
CINCINNATI, OHIO 45202-3373



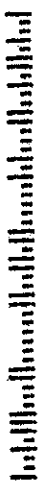
CH 452



PENSION AND WELFARE BENEFITS ADMINISTRATION
P. O. BOX 75212
Washington, D. C. 20013-521

Return Receipt Requested

RETURN RECEIPT REQUESTED



DETACH BEFORE DEPOSITING

DETAILS OF ACCOUNT	VOUCHER NO.
THE UNIVERSITY CLUB OF CINCINNATI, INC.	

12/16/92 "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."

\$1,000.00