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STATEMENT UNDER ERISA REGULATIONS SECTION 2520.104-23

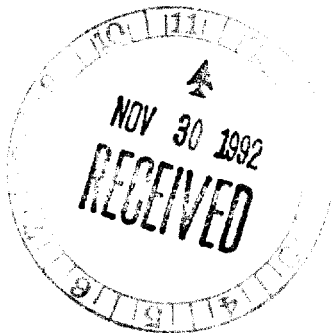
EMPLOYER - R.T. Vanderbilt Company, Inc.
30 Winfield Street
Norwalk, CT 06855


E.I.N. - 13-1432885

DECLARATION - The Employer declares that it maintains unfunded retirement plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

NUMBER OF PLANS - Six (6)

NUMBER OF PARTICIPANTS - One (1) participant in each plan.





Joseph Denaro
Vice President - Treasurer
and Chief Financial Officer





12 11 10

Benefits Administration

0013-5212

Company, Inc.

CT 06855