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WESTCHESTER COUNTRY CLUB

RYE, NEW YORK

10580

December 4, 1992

19-41 967-6000

Pension and Welfare Benefits Administration  
Post Office Box 75212  
Washington, D.C., 20013-5212

Top Hat Plan Filing Under Civil  
Penalty Relief Program

RE: A plan of deferred compensation sponsored by --  
Westchester Country Club

Dear Sir or Madam:

141518

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: 99 Biltmore Ave., Rye, New York 10580.
3. The employer identification number is: 13-1737009.
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 2.

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

Westchester Country Club

By [Signature]  
Manager, Admin. Services

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED



# Club Managers Association of America

1733 KING STREET

ALEXANDRIA, VIRGINIA 22314

PHONE (703) 739-9500

FAX (703) 739-0124

**President**

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Boca Raton, FL 33434-9990

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Indianapolis, IN 46204

JOHN A. JORDAN, CCM  
Cherokee Town and Country Club  
155 W. Paces Ferry Road, N.W.  
Atlanta, GA 30363

W. H. "Bill" KENDALL, CCM  
Woodmont Country Club  
1201 Rockville Pike  
Rockville, MD 20852

PAUL K. SKELTON, CCM  
Troon Golf and Country Club  
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Scottsdale, AZ 85255

NORMAN J. SPITZIG, Jr., CCM  
Fort Wayne Country Club  
5221 Covington Road  
Fort Wayne, IN 46804

**Executive Vice President**

JAMES B. SINGERLING, CCM, CEC

Dear CMAA Member:

November 23, 1992

As we previously informed you, the Association has retained legal counsel to examine the governmental reporting and disclosure requirements with respect to the AETNA Deferred Compensation Plan and those Clubs that have adopted the Plan. Legal counsel has informed us that each Club is separately responsible for complying with the reporting and disclosure requirements.

In order to satisfy the reporting and disclosure requirements, each Club should have filed a statement with the U.S. Department of Labor within 120 days after the date on which the Club adopted the Plan. The statement would have relieved the Club from having to file annual reports with the Internal Revenue Service on Form 5500 for each year that the Plan has been in existence.

If the statement was not filed within the 120 day period, all of the reporting and disclosure requirements became applicable to your Plan, including the filing of the Annual Report Form 5500, and the Club is subject to civil penalties for the failure to comply.

As you may be aware, the Department of Labor is currently sponsoring a Civil Penalty Relief Program for Late Filers. The Program is available to those Clubs that have adopted the Plan. **Under the Late Filer Program, each Club that failed to file the statement within the 120 day period will not be required to file an Annual Report Form 5500 for any prior year as long as that statement is filed with an accompanying penalty payment of \$1,000 on or before December 31, 1992.** We strongly recommend that each Club that did not initially file the statement with the Department of Labor, take advantage of this Relief Program before December 31, 1992.

We have attached a "sample statement" that may be used in making this filing on behalf of your Club under the Late Filer Program.

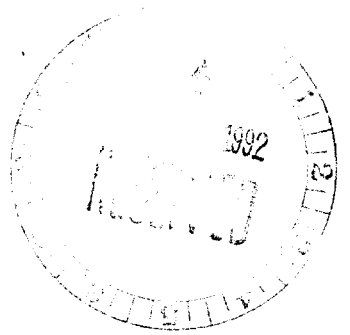
The Late Filer Program allows plan sponsors a one-time opportunity to file an overdue Annual Report without incurring a full penalty. The civil penalty is the lesser of \$50 per day, for each day following the date on which the annual report was due, not to exceed \$1,000 per statement. If the statement is filed after the grace period, penalties as high as \$300 per day per plan, up to \$30,000 can be assessed.

If you have any questions with respect to the forgoing, please call Bill Hamm at (800) 282-3343.

Sincerely,

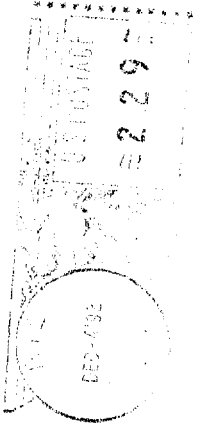
James B. Singerling, CCM  
Executive Vice President

P.S. Please re-check your records for the proper paper work that should have been filed with the Department of Labor. We have found that many managers have filed and do not need to submit the enclosed sample form before the December 31, 1992 deadline.



14,518

WESTCHESTER COUNTRY CLUB  
99 BILTMORE AVE.  
RYE, N.Y. 10580



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