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November 9, 1999

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\*Registered Patent Attorney

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

Top Hat Plan Exemption  
Pension and Welfare Benefits Administration  
Room N-5638  
U.S. Department of Labor  
200 Constitution Avenue, N.W.  
Washington, D.C. 20210

Woods Architects-Builders, Inc. Non-  
Qualified Deferred Compensation Plan

Ladies and Gentlemen:

We represent the Woods Architects-Builders, Inc., Non-Qualified Deferred Compensation Plan ("Plan"). The Plan is a top hat plan. The Plan requests permission to satisfy the annual reporting requirements by means of the alternative method specified in Department of Labor Regulation section 2520. 104-23. We are enclosing the statement required by the regulation that has been completed by the plan administrator. If any additional information is needed, please contact me.

Very truly yours,

SUTIN, THAYER & BROWNE  
A Professional Corporation

By   
Marjorie A. Rogers  
Albuquerque Office

MAR/HG:trd

Enclosure

514885.wpd

cc: Sharon Woods  
Katie Delaney

October 20, 1999

Secretary of Labor  
Top Hat Plan Exemption  
Pension and Welfare Benefits Administration  
Room N-5638  
U.S. Department of Labor  
200 Constitution Avenue, N.W.  
Washington, D.C. 20210

Request for Alternative Method of  
Compliance with the Reporting and  
Disclosure Requirements for Non-  
Qualified Deferred Compensation Plans  
for Selected Employees

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Dear Secretary:

I have been appointed by the Plan Administrator of the Woods Architects-Builders, Inc. Non-Qualified Deferred Compensation Plan ("Plan") to assist in the administration of the Plan. The Plan was established by Woods Architects-Builders, Inc. to benefit a select group of management and highly compensated employees. The purpose of this letter is to request that the Plan be allowed to satisfy the reporting requirements of ERISA by using an alternative form of compliance.

STATUTORY REQUIREMENT

Section 104 of ERISA provides that the administrator of any employee benefit plan file with the Secretary of Labor ("Secretary") an annual report for the plan within 210 days after the close of the such year. Section 110 of ERISA, however, authorizes the Secretary to prescribe an alternative method for satisfying any reporting requirement.

DEPARTMENT OF LABOR REGULATION

The Secretary in DOL Regulation 2520.104-23 has provided an alternative method of complying with the reporting requirements of Part 1 of ERISA. According to the Regulation the alternative method may be used by unfunded or insured pension plans maintained by an employer for a select group of management or highly compensated employees. The alternative method requires that the information requested in paragraph (b)(1) of DOL Regulation 2520.104-23 be provided to the Secretary.

FILING STATEMENT FOR ALTERNATIVE METHOD

The Plan has been established to provide deferred compensation to a select group of highly compensated employees and management personnel. The Plan will be maintained as an unfunded plan. The obligations under the Plan will be satisfied out of the general assets of the employer. The information required pursuant to DOL Regulation 2520.104-23(b)(1) is as follows:

1. Employer's Name: Woods Architects-Builders, Inc.
2. Employer's Address: 302 Catron Street  
Santa Fe, New Mexico 87501
3. Employer Identification Number: 85-0273293
4. Plan Purpose: The Plan is maintained for the purpose of providing deferred compensation for a select group of management and highly compensated employees
5. The Number of Plans: One
6. Number of Employees in the Plan: One

Secretary of Labor  
October 20, 1999  
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If any additional information is needed, please contact me.

Very truly yours,

Woods Architects-Builders, Inc.

By  Sharon Woods

SW:trd  
514874.wpd

