

JUPITER ISLAND CLUB, INC.
STATEMENT PURSUANT TO 29 CFR 2520.104-23

1. Name and Address of the Employer.

Jupiter Island Holdings, Inc.
P.O. Box 375
Hobe Sound, FL 33475

2520052092107

2. Employer Identification Number assigned by the IRS.

Jupiter Island Holdings, Inc.'s EIN is 59-0292210.

3. Employer's Declaration.

Jupiter Island Holdings, Inc. maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. Jupiter Island Club, Inc. currently has one such plan which benefits only one employee.

Jupiter Island Holdings, Inc. will forward the plan documents to the Department of Labor upon request.



GUNSTER YOAKLEY
ATTORNEYS AT LAW

U.S. DEPT. OF LABOR
EBSA/PUBLIC DISCLOSURE
01 JUL 24 PM 1:26

July 17, 2001

Top Hat Plan Exemption
Pension and Benefits Administration, Room N-5644
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210

Jupiter Island Holdings, Inc.
EIN: 59-0292210

Gentlemen:

I enclose a statement which pursuant to 29 CFR § 2520.104-23 is required to satisfy the alternative method of compliance with the reporting and disclosure requirements of part 1 of title I of the Employee Retirement Income Security Act of 1974 for unfunded pension plans maintained by an employer for a select group of employees.

Please acknowledge receipt of the enclosed document by date-stamping the enclosed copy of this letter and returning it to me in the envelope provided. Feel free to contact me if you require any additional information.

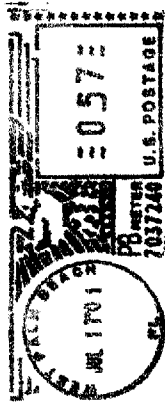
Sincerely,

Adi Rappoport

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Gunster, Yoakley & Stewart, P.A.
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9/23



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