

LAW OFFICES
OF
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U.S. DEPT. OF LABOR
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May 9, 2001

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Secretary of Labor
Top Hat Plan Exemption
Pension and Welfare Benefits Administration
U.S. DEPARTMENT OF LABOR
200 Constitution Avenue, NW
Washington, D.C. 20210

Re: Worldwide Career Management, Inc. Split Dollar Life
Insurance Plan

Alternative Method of Compliance with the Reporting and Disclosure
Requirements of Part 1 of Title I of ERISA pursuant to Section
2520.104-23 of the DOL Regulations

Dear Gentlemen,

Pursuant to the provisions of Section 2520.104-23 of the Regulations of the Department of Labor (hereinafter referred to as "DOL"), we hereby satisfy the alternative method of compliance with the reporting and disclosure requirements of Part 1 of Title I of ERISA for the Worldwide Career Management, Inc. Split Dollar Life Insurance Plan.

In accordance with the above referenced Section of the DOL Regulations, we hereby file this Statement with the following information:

Secretary of Labor
Top Hat Plan Exemption
Pension and Welfare Benefits Administration
U.S. DEPARTMENT OF LABOR
May 9, 2001
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1. Name of Employer and its Employer Identification Number:
Worldwide Career Management, Inc.
EIN: 91-2009418
2. Employer's Address:
110 West "C" Street, Suite "C"
San Diego, CA 92101
3. Name of Plan:
Worldwide Career Management, Inc. Split Dollar Life Insurance Plan
4. Declaration:
We hereby declare that the Employer maintains the Worldwide Career Management, Inc. Split Dollar Life Insurance Plan as a Plan primarily for the purpose of providing funding for the life insurance benefits for a select group of management or highly compensated employees, and for which benefits are paid as needed solely from the general assets of the Employer pursuant to the provisions of a trust which are available to the Employer in the event the Employer is Insolvent as provided in Article 9 of the Plan.
5. Number of such Plans:
One (1)
6. Number of Employees Participating in the Plan:
four (4) presently, but more employees are anticipated to participate in the future.
7. Providing Plan Documents to DOL:
Upon the request of the Secretary of Labor, we will provide copies of any and all Plan documents, including any and all financial information regarding the Plan, to the DOL.

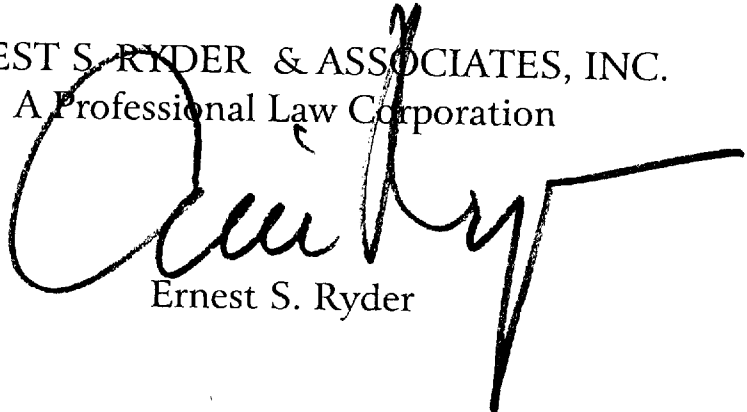
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By this alternative method of compliance, the reporting and disclosure requirements of Part 1 of Title I of ERISA are satisfied, with the result that the general reporting and disclosure requirements thereof which would otherwise be applicable are no longer applicable to the Worldwide Career Management, Inc. Split Dollar Life Insurance Plan.

Thank you in advance for your kind attention to this very important matter. If you have any questions or comments, or need any additional information, please do not hesitate to give us a call.

With kindest regards,

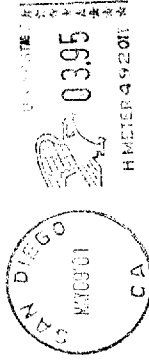
ERNEST S. RYDER & ASSOCIATES, INC.
A Professional Law Corporation

A large, stylized handwritten signature in black ink, appearing to read "Ernest S. Ryder". The signature is written over the typed name and extends to the right with a long horizontal stroke.

Ernest S. Ryder

cc: Karen S. Baker, President, Worldwide Career Management, Inc.
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~~Secretary Of Labor~~
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