

2520052092486

RETAIL TOBACCO DEALERS OF AMERICA, INC.
12 GALLOWAY AVENUE
COCKEYSVILLE, MARYLAND 21030

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

Re: The Retail Tobacco Dealers of America, Inc. Supplemental Executive Retirement Plan

Dear Secretary:

Pursuant to Section 2520.104-23 of the Department of Labor's Regulations, this letter will serve as notice that, with respect to the Retail Tobacco Dealers of America, Inc. Supplemental Executive Retirement Plan (the "Plan"), the undersigned intends to utilize the alternative form of compliance with the reporting and disclosure requirements of Part 1 of Title I of the Employee Retirement Income Security Act of 1974 ("ERISA"), which alternative form of compliance is provided in the aforesaid Regulations Section.

Pursuant to Regulations Section 2520.104-23(b), the following information is provided:

1. Name and Address of Employer: Retail Tobacco Dealers of America, Inc.
12 Galloway Avenue
Cockeysville, MD 21030
2. Employer's Federal Employer Identification Number: 13-5342320
3. The Employer hereby declares that it maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
4. The Employer hereby states that it maintains only the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The Plan is expected to cover one employee.

Pension and Welfare Benefits Administration

Page 2

Pursuant to Regulations Section 2520.104-23(b)(2), the Employer will provide Plan documents, if any, to the Secretary of Labor upon request as required by Section 104(a)(1) of ERISA.

Very truly yours,

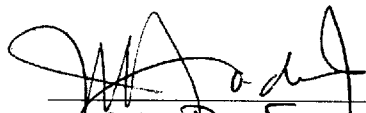
Retail Tobacco Dealers of America, Inc.

By:

Print Name:

Print Title:

Date:



RRA B. FADIER, JR.

EXECUTIVE DIRECTOR

JULY 28, 1999

1221021