



2520052092682

Thursday, July 29, 1999

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

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: San Diego Country Estates Association Deferred Compensation
Plan (the "Plan"); San Diego Country Estates Association, Inc. (the
Employer")**

Dear Sir/Madam:

Pursuant to Section 2520.104-23 of the Department of Labor Regulations, the undersigned hereby provides you with the following information respecting the above-referenced plan. This notification is intended to comply with the alternative method of compliance with the reporting and disclosure requirements for unfunded pension plans maintained by an employer for a select group of management or highly compensated employees.

1. The name and address of the employer is as follows:

San Diego Country Estates Association, Inc.
24157 San Vincente Road
Ramona, CA 92065

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2. The Employer Identification Number assigned by the Internal Revenue Service for the Employer is the following: **23-7292248**.

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 number of such plans and the number of employees participating in such plans is as follows:

Number of Plans

Number of Participants

One (1) Deferred
Compensation Plan

One (1) Participant

Very truly yours,

Security Trust Company

William L. Exeter
Vice President and
Chief Financial Officer

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