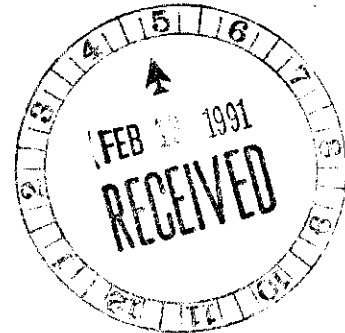


February 5, 1991

2520032065648



Office of Pension and Welfare Programs
Labor Management Services Administration
U.S. Department of Labor
Washington, D.C. 20216

FROM: Mancini & Groesbeck, Inc. - Utah
EIN: # 87-0271769

This document constitutes the statement required by Labor Regulation §2520.104-23, 29 CFR, to be filed with the Secretary of Labor in respect to nonqualified deferred compensation plans maintained by the above employer.

The employer currently maintains two nonqualified deferred compensation plans for executives who are a select group of management or who are highly compensated.

The number of employees in each plan is one.

The above employer is willing to furnish documents, if any, with respect to the above plan if requested by the Secretary of Labor.

Very truly yours,

MANCINI & GROESBECK, INC. - UTAH

By: Ted Ma
Its: president

E7606