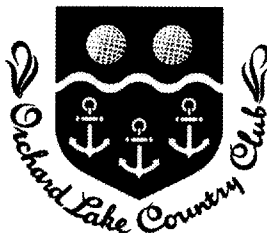


John G. "Ted" Gillary, CCM
General Manager
Orchard Lake Country Club



2520053321314

5000 West Shore Drive
Orchard Lake, MI 48324
Phone 682-0100 Fax 682-9680

December 18, 1992

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Pension and Welfare Benefits Administration
P.O. Box 75212
Washington, D.C., 20013-5212

JAN - 5 1993

Top Hat Plan Filing Under Civil Penalty Relief Program

SUBJECT: A Plan of Deferred Compensation By:

ORCHARD LAKE COUNTRY CLUB (the Employer)

Dear Sir/Madam:

18,901

In accordance with Pension and Welfare Benefits Administration (PWBA) Notice on Civil Penalty Relief for Top Hat Plans, Late Filers, as published in the Federal Register on July 24, 1992 (57 FR 33019), the following information is disclosed and the accompanying payment is being made to the U.S. Department of Labor (DOL) in order to comply with the reporting and disclosure requirements of the Employee Retirement Income Security Act of reporting and disclosure requirements of the Employee Retirement Income Security Act of 1974 (ERISA), under the alternative method of compliance as set forth by DOL Regulation §2520.104-23.

1. The above referenced Employer maintains a plan of deferred compensation in the form of the Club Managers Association of America Master Deferred compensation Plan Pursuant to Section 457 of the Internal Revenue Code (the "Plan").
2. The address of the Employer is: 500 West Shore Drive, Orchard Lake, MI 48324
3. The employer identification number of the Employer is: 38-0896360.
4. The Employer maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
5. The number of employees in the Plan is 6.

If you require a copy of the Plan document or any additional information, please do not hesitate to contact the undersigned.

ORCHARD LAKE COUNTRY CLUB

By


General Manager

JAN - 5 1993

18,901

07251

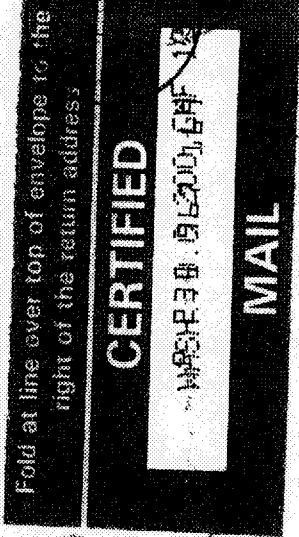
INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	DISCOUNT	AMOUNT PAID
122192	12/21/92 TOP HAT PLAN - CIVIL PENALTY	1000.00	.00	1000.00
TOTAL FOR VENDOR *00121		1000.00	.00	1000.00

ORCHARD LAKE COUNTRY CLUB ORCHARD LAKE, MICHIGAN 48324 DETACH BEFORE CASHING



5000 WEST SHORE DRIVE
ORCHARD LAKE, MI 48324

**RETURN RECEIPT
REQUESTED**



Fold at line over top of envelope to the right of the return address

CERTIFIED

MAIL

*Person and Welfare Benefits Assoc.
P.O. Box 75212
Washington, D.C. 20013-5212*

