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Mullen & Henzell L.L.P.

ATTORNEYS AT LAW

U.S. DEPT. OF LABOR
PUBLIC DISCLOSURE
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October 12, 2001

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: Union Asphalt, Inc., a California corporation

Dear Sir or Madam:

On October 3, 2001, Union Asphalt, Inc., a California corporation, adopted and will now maintain an unfunded employee pension benefit plan for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The effective date of the plan is April 1, 2001.

The purpose of this letter is to satisfy the alternative form of compliance with the reporting and disclosure requirements of Part 1 of Title I of ERISA as set forth in DOL Reg. 2520.104-23.

- | | |
|---|---|
| a. Name and Address of Employer | Union Asphalt, Inc.
P.O. Box 1280
Santa Maria, CA 93456 |
| b. Employer ID No. | 95-2255065 |
| c. Number of plans | 1 |
| d. Number of employees covered under plan | 9 |

Very truly yours,

Christine P. Roberts of
Mullen & Henzell L.L.P.

CPR:nlh

cc: Dennis W. Reilly, Esq.
Mr. Robert Maloy
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- J. ROBERT ANDREWS
- DENNIS W. REILLY
- JEFFREY C. NELSON
- JAY L. BECKERMAN
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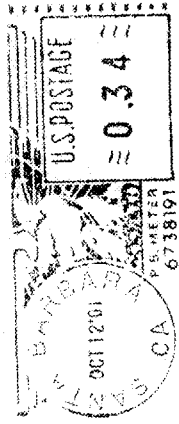
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