

Sumitomo Trust & Banking Co. (U.S.A.)

527 MADISON AVENUE
NEW YORK, N.Y. 10022

BRUCE A. ORTWINE
Senior Vice President
&
Senior General Counsel

2520032030690

DIRECT: (212) 418-4806
FAX: (212) 418-4830

November 10, 1995

BY CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

Office of Employee Benefits Security
Labor-Management Services Administration
U.S. Department of Labor
Washington, DC 20216

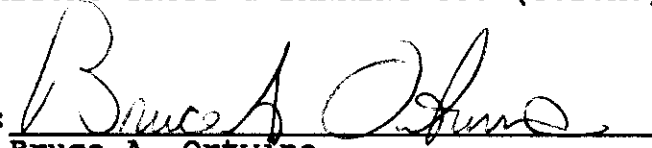
Gentlemen:

Pursuant to DOL Reg. Sec. 2520.104-23 Fed. Reg. 24657 (August 15, 1975), Sumitomo Trust & Banking Co. (U.S.A.), at 527 Madison Avenue, New York, NY 10022, Employer Identification Number 133382184, hereby declares that as an employer it maintains an unfunded employee benefit plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. There is one plan in effect with a total number of four participants.

The above plan is maintained pursuant to written plan documents which will be provided to the Secretary of Labor or his or her delegate on request as required by Sec. 104(a)(1) of the Employee Retirement Income Security Act of 1974.

Sincerely yours,

SUMITOMO TRUST & BANKING CO. (U.S.A.)

By: 
Bruce A. Ortwine
Senior Vice President and
Senior General Counsel

55 NOV 21 AM 8:45
DOL-PWA
PUBLIC RECORDS