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PIETZSCH BONNETT & WOMACK, P.A.

An Affiliate of Polese, Pietzsch, Williams & Nolan, P.A.

ATTORNEYS

**PIETZSCH
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LISA WOMACK

November 7, 2005

File No.: 8877.01

Top Hat Plan Exemption
Employee Benefits Security Administration
U.S. Department of Labor/Room N-1513
200 Constitution Avenue, N.W.
Washington, D.C. 20210

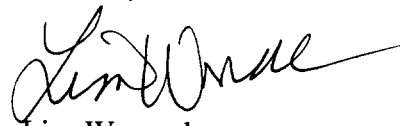
Re: Staubach Retail Services-West, LLC Executive Deferred Compensation Plan
EIN 20-3026825

Dear Sir/Madam:

Please see our enclosed letter dated September 1, 2005. We are resending this letter because it is unclear from our files whether this letter was previously sent to you as intended.

If you have any questions or comments, please contact me.

Sincerely,



Lisa Womack

LAW:sjt
Enclosure

U.S. DEPT. OF LABOR
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September 1, 2005

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Employee Benefits Security Administration
U.S. Department of Labor/Room N-1513
200 Constitution Avenue, N.W.
Washington, D.C. 20210


Re: Staubach Retail Services-West, LLC Executive Deferred Compensation Plan
EIN 20-3026825

Dear Sir/Madam:

Pursuant to Department of Labor Regulation Section 2520.104-23, we hereby submit the following declarations for the purpose of satisfying the reporting and disclosure provisions of Part 1 of Title I of the Employee Retirement Income Security Act of 1974. On August 31, 2005, Staubach Retail Services-West, LLC ("Company") adopted a top hat plan known as the Staubach Retail Services-West, LLC Executive Deferred Compensation Plan ("Plan"). The effective date of the Plan is January 1, 2005.

The Plan is an unfunded deferred compensation plan maintained by the Company primarily for the purpose of providing deferred compensation for a select group of management and highly compensated employees. Benefits under the Plan will be paid, as needed, solely from the general assets of the Company, or provided exclusively through insurance contracts or policies, the premiums for which will be paid directly by the Company from its general assets, issued by an insurance company or similar organization which is qualified to do business in any state. As of this date, approximately one (1) employee has been selected to participate in the Plan.

Sincerely,



Lisa Womack

LAW:slt

cc: Dave Cheatham
Sharon Nelson

PIETZSCH, BONNETT & WOMACK

A PROFESSIONAL ASSOCIATION

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2702 North Third Street, Suite 3000

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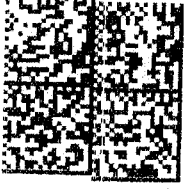
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Washington, D.C. 20210

