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The Denver Country Club

U.S. DEPT. OF LABOR
PENSION AND WELFARE BENEFITS ADMINISTRATION
05 NOV 21 PM 1:14

November 18, 2005

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Registration Statement

Dear Sirs:

Please let this letter serve as a declaration that the employer listed below maintains a non-qualified plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees:

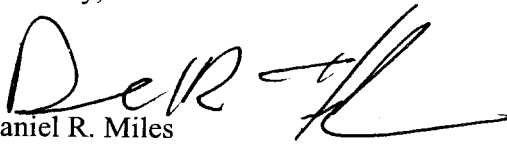
The Denver Country Club
1700 East First Avenue
Denver, CO 80218

EIN: 84-0186840

The Denver Country Club 457(b) Plan is the only non-qualified plan maintained by the employer and the plan currently covers 4 employees.

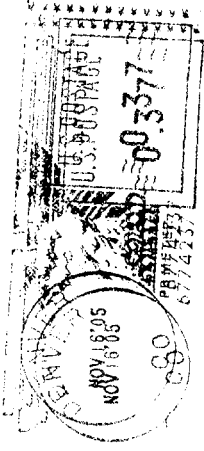
Should you need any additional information regarding this plan, please feel free to contact me. I can be reached at (303) 733-2441.

Sincerely,


Daniel R. Miles
General Manager
The Denver Country Club



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East First Avenue and Gilpin Street
Denver, Colorado 80218



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