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**North Star Consultants, Inc.**  
*Insurance Products and Services*

**CRI Securities, LLC**  
*Securities and Investments*  
*Member NASD and SIPC*

**Marathon Advisors, Inc.**  
*Registered Investment Advisor*

**Securian Financial Services, Inc.**  
*Variable Products and Securities*  
*Member NASD and SIPC*

DATE: December 1, 2005

TO: Pension and Welfare Benefits Administration  
Room N-5644  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington DC 20210

FROM: North Star Consultants, Inc.  
41-0948436

2701 University Ave SE  
Minneapolis, MN 55414  
612 617 6000


RE: Top Hat Plan Exemption

This document constitutes the statement required by 29 C.F.R. 2520.104-23(a)(1) to be filed with the Secretary of Labor in respect to Nonqualified Benefit Plans maintained by the above employer.

The employer currently maintains one (1) Nonqualified Benefit Plan for managerial and highly compensated employees. The plan provides for participation by managerial and highly compensated employees and independent contractors. At this time, no employees are participants in the plan. Copies of the plan will be provided to the Department upon the receipt of a written request.

The number of participants in each plan is as follows:

Plan 1: 0 executives



David Vasos  
CFO

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CRI Securities, LLC is affiliated with North Star Consultants, Inc., Marathon Advisors, Inc., and Securian Financial Services, Inc. Securian Financial Services, Inc. operates under separate ownership from North Star Consultants, Inc. and Marathon Advisors, Inc.

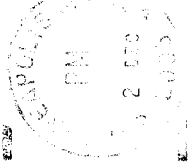


Affiliated with Securian Financial Network

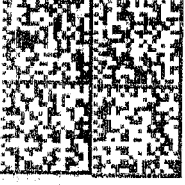


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Minneapolis, MN 55414-3233



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