

Stacy and Witbeck, Inc.

GENERAL ENGINEERING CONTRACTORS

STATE LICENSE NO. 414305

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06 JUL 24 PM 3:10

July 11, 2006

Secretary of Labor
Top Hat Plan Exemption
Employee Benefits Security Administration
Room N-1513
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210-0001

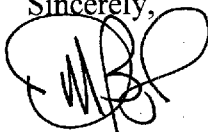
Re: STACY AND WITBECK KEY EMPLOYEE DEFERRED BENEFIT PLAN

Dear Sir/Madam:

We are making this filing pursuant to Section 2520.104-23 of the regulations under ERISA. By making this filing we are asserting our right to be exempt from the reporting and disclosure requirements of Title I of ERISA.

1. Employer Name: Stacy and Witbeck, Inc.
2. Employer Address: 1320 Harbor Bay Parkway, Suite 240
Alameda, CA 94502-6580
3. Employer Identification Number: 94-2787950
4. Plan Name: Stacy and Witbeck Key Employee Deferred Benefit Plan
5. The Plan is maintained to provide deferred compensation for a select group of management or highly compensated employees.
6. The number of employees initially eligible to participate under the Plan is approximately 18.
7. The Employer also sponsors the following top hat Plan(s) with the approximate number of participants shown: None

Sincerely,



D.M. Boyle
Chief Financial Officer

cc: Gary W. Blank (Carlson, Quinn & Associates)

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ALAMEDA, CALIFORNIA 94502-6580

OAKLAND

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