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August 21, 2006

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Secretary of Labor
Top Hat Plan Exemption
Employee Benefits Security Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, D.C. 20210

Re: The Commonwealth Club's
Deferred Income Plan for Jonathan J. Phares
E.I.N.: 54-0178730

Dear Ms. Secretary:

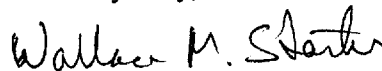
Please be advised that The Commonwealth Club, with its headquarters at 401 West Franklin Street, Richmond, Virginia 23220, sponsors an unfunded pension plan known as The Commonwealth Club's Deferred Income Plan for Jonathan J. Phares. The plan was executed on June 27, 2006 with a January 1, 2006 effective date.

The number of participants in the plan currently is one.

The plan is maintained primarily for the purpose of providing deferred compensation for one of a select group of management or highly compensated employees (a "top hat" plan) as described in ERISA Sections 202(2), 301(a)(3), and 401(a)(1) of The Commonwealth Club.

This notice is being provided pursuant to Department of Labor Regulation Section 2520.104-23. Please let me know if you need any further information in this regard.

Yours very truly,



Wallace M. Starke

2061/773

cc: Mr. Jonathan J. Phares

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