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The Country Club of Virginia
INCORPORATED

October 25, 2006

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

Registration Statement For "Top-Hat" Plans

Gentlemen:

Pursuant to Department of Labor Regulation section 2520.104-23, The Country Club of Virginia, Inc. (the Company), 6031 St. Andrews Lane, Richmond, VA 23226, Employer Identification Number 54-0181850, hereby declares that as an employer it maintains the following employee benefit plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

The Country Club of Virginia, Inc. 457(b) Plan

The Company maintains The Country Club of Virginia, Inc. 457(b) Plan, effective October 1, 2006, which currently has eight participants.

Copies of the above The Country Club of Virginia, Inc. 457(b) Plan, to the extent maintained pursuant to written plan documents, will be provided to the Secretary of Labor or his delegate on request as required by section 104(a)(6) of the Employee Retirement Income Security Act of 1974, as amended.

Sincerely yours,

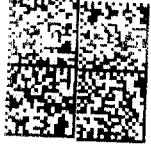
Angela H. Stewart
Assistant Treasurer

The Country Club of Virginia
INCORPORATED
6031 ST. ANDREWS LANE • RICHMOND, VIRGINIA 23226

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