

PIETZSCH, BONNETT & WOMACK, P.A.

An Affiliate of Polese, Pietzsch, Williams & Nolan, P.A.

ATTORNEYS2702 North Third Street, Suite 3000
Phoenix, Arizona 85004-4607
e-mail: waltz@ppwn.comTelephone: (602) 604-6205
Facsimile: (602) 279-5107**PATRICK J. WALTZ**

July 13, 2007

File No.: 5835.05

PRIVILEGED AND CONFIDENTIALEmployee Benefits Security Administration
Top Hat Plan Exemption
U.S. Department of Labor/Room N-1513
200 Constitution Avenue, N.W.
Washington, D.C. 20210Re: La Posada at Park Centre, Inc. ("Company")
EIN: 86-0828160
501 S. La Posada Circle
Green Valley, AZ 85614

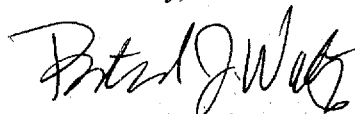
07 JUL 19 PM 12:57

Dear Sir/Madam:

Pursuant to Department of Labor Regulation Section 2520.104-23, we are submitting the following declarations on behalf of the above-referenced Company for the purpose of satisfying the reporting and disclosure provisions of Part 1 of Title I of the Employee Retirement Income Security Act of 1974.

The Company adopted the La Posada 457(b) Plan ("Plan"), primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The effective date of the Plan is January 1, 2004, and three employees have been selected to participate in the Plan.

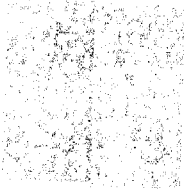
Sincerely,



Patrick J. Waltz

Circular 230 Disclaimer: To ensure compliance with Treasury Regulations governing written tax advice, please be advised that any tax advice included in this communication, including any attachments, is not intended, and cannot be used, for the purpose of (i) avoiding any federal tax penalty or (ii) promoting, marketing, or recommending any transaction or matter to another person.

PIETZSCH, BONNETT & WOMACK
A PROFESSIONAL ASSOCIATION
Attorneys at Law
2702 North Third Street, Suite 3000
Phoenix, Arizona 85004-4607



500 JUNE 1 2004

PRIVILEGED AND CONFIDENTIAL

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

2021010000

|||||