



January 19, 2009

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

Re: Top Hat Exemption Statement

Ladies and Gentlemen:

Pursuant to DOL Regulation §2520.104-23, promulgated by the United States Department of Labor under the Employee Retirement Income Security Act of 1974, as amended, the undersigned Plan Administrator of the deferred compensation arrangements (the "Plans") established by Sammons Enterprises, Inc. and its affiliates (the "Employer"), hereby represents that:


1. The Employer that sponsors the Plans is Sammons Enterprises, Inc. and its affiliates. The Employer's address is: 5949 Sherry Lane, Suite 1900, Dallas, Texas 75225.
2. The employer identification number assigned to the Employer by the Internal Revenue Service is 75-6027423.
3. The Employer maintains the Plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
4. There are 5 Plans, which currently cover 8, 4, 9, 7 and 3 employees, respectively. The Employer does not sponsor or maintain any other form of "employee pension benefit plan" as defined under DOL Regulation §2520.104-23(d) covering the employees of the Employer or any affiliate.

Employee Benefits Security Administration
January 19, 2009
Page Number 2

The undersigned Plan Administrator will furnish to the Secretary of Labor such plan documents as the Secretary may request.

Yours truly,

SAMMONS CORPORATION

By: 
Heather Kreager
Title: Senior Vice President

cc: Mr. Michael Hart

SAMMONS
CORPORATION

5949 SHERRY LANE / SUITE 1900
DALLAS, TEXAS 75225-6553



U.S. POSTAGE
\$00.42

DALLAS TX 75225



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

