



EBSA/PUBLIC DISCLOSURE

2009 AUG 11 AM 7:05

July 16, 2009

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

Re: Notice of Plan of Deferred Compensation

Gentlemen:

Pursuant to DOL Reg. Sec. 2520, 104-23, the undersigned employer hereby files the following information with respect to its plan of deferred compensation.

1. Name and Address of Employer:

Royal Poinciana Golf Club, Inc.
1600 Solana Road
Naples, FL 34103

2. Federal Employer Identification No. (EIN):

59-1215667

3. The Employer maintains the deferred compensation plan primarily for the purpose of providing deferred compensation to a select group of management or highly-compensated employees.

4. One (1) employee is initially being covered by this plan.

Very truly yours,

By: _____

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GRAY ROBINSON
ATTORNEYS AT LAW

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