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May 20, 2003

Secretary of Labor
Top-Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

**Re: *John's Island Club, Inc.*
*Top-Hat Plans***

Dear Secretary:

Pursuant to Section 2520.104-23 of the Department of Labor's Regulations, this letter will serve as notice that, with respect to the John's Island Club, Inc. Top-Hat Plans, the undersigned intends to utilize the alternative form of compliance with the reporting and disclosure requirements of Park 1 of Title I of the Employee Retirement Income Security Act of 1974 ("ERISA"), which alternative form of compliance is provided in the aforesaid Regulations Section.

Pursuant to Regulations Section 2520.104-23(b), the following information is provided:

1. John's Island Club, Inc., 3 John's Island Drive, Vero Beach, Florida 32963-3234.
2. Employer's EIN #59-2607344.
3. The Employer hereby declares that it maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
4. The Employer hereby states that it maintains three plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees, and the number of employees in such Plan is as follows:
 - (a) John's Island Club, Inc. 457(b) Deferred Compensation Plan -- 12 employees participating.

Secretary of Labor

May 20, 2003

Page 2

(b) John's Island Club, Inc. 457(f) Executive Compensation Plan – 8 employees participating.

(c) John's Island Club, Inc. Supplemental Retirement Plan – 1 employee participating.

Pursuant to Regulations Section 2520.104-23(b)(2), the Employer will provide Plan document, if any, to the Secretary of Labor upon request as required by Section 104(1)(1) of ERISA.

Very truly yours,

JOHN'S ISLAND CLUB, INC.

By: Wayne Miller
Wayne Miller, Business Manager

