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2520032541292

February 28, 1995

*NOT ADMITTED IN DC

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue NW.
Washington, DC 20010

Re: **Bethany Village**
Supplemental Executive Retirement Plan

Dear Sir/Madam:

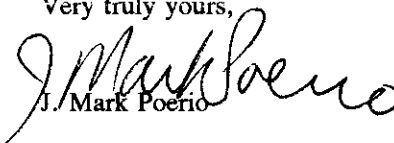
Please be advised that on January 1, 1995, Bethany Retirement Home, Inc. ("Bethany") entered into the Bethany Village Supplemental Executive Retirement Plan (the "Plan") with its Chief Executive Officer. Under section 104 (a)(3) of the Employee Retirement Income Security Act ("ERISA") we intend this letter to satisfy the disclosure requirements applicable to the Agreement under Part 1 of Title I of ERISA.

The Plan is maintained by Bethany primarily for the purpose of providing benefits to a select group of management or highly compensated employees and these benefits are paid for from the general assets of Bethany. Relevant documents will be provided to you upon your request, as required by section 104(a)(1) of ERISA.

Bethany is located at 75 Watkins Road, Horseheads, New York 14845, and has been assigned EIN 16-0988865.

If you have any questions, please do not hesitate to contact me.

Very truly yours,


J. Mark Poerio

JMP:rlq:5257

cc: Thomas Santobianco, Vice President
Bethany Village