

December 3, 2010  
EBSA/PUBLIC DISCLOSURE  
2010 DEC 27 PM 3:40

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

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

FROM: St. John Holdings, Inc.  
E.I.N: 66-0405683  
Plan No. 888

St. John Holdings, Inc. (the "Employer") maintains the St. John Holdings, Inc. Executive Compensation Plan (the "Plan") primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. This is the only non-qualified deferred compensation plan maintained by the Employer. The number of employees participating in the Plan is 20.

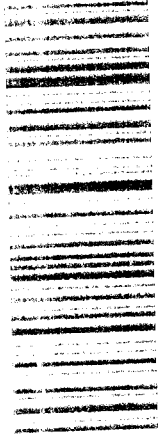
**ST. JOHN HOLDINGS, INC.**

By: Michael J. Quigg  
Name: Michael J. Quigg  
Title: EVP

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**GT** GreinbergTraining

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2014-01-01  
2014-01-01  
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