

January 28, 2011

**BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Jodene K. Arakaki
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2520111670011

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


Re: Statement of Deferred Compensation Plan

Dear Sir or Madam:

You are hereby notified, pursuant to Reg. §2520.104-23, that the following employer maintains a plan primarily for the purpose of providing deferred compensation for a select group or management and/or highly compensated employees:

Name of Employer:	Hale Kipa, Inc.
Address of Employer:	615 Piikoi Street, Suite 203 Honolulu, Hawaii 96814-3139
EIN of Employer:	23-7061499
Number of Plans:	1
Number of Participants in the Plan:	1

Very truly yours,



Jodene K. Arakaki
Roger W. Fonseca
Ellen N. Kawashima
for
CADES SCHUTTE
A Limited Liability Law Partnership

ImanageDB:1615542.1

