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EBSA/PUBLIC DISCLOSURE

2011 AUG 29 PM 2:51

PLAN ADMINISTRATIVE COMMITTEE
APEX BULK CARRIERS LLC
DEFERRED COMPENSATION PLAN

August 23, 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Alternative Method of Compliance for Pension Plans for Certain Selected Employees

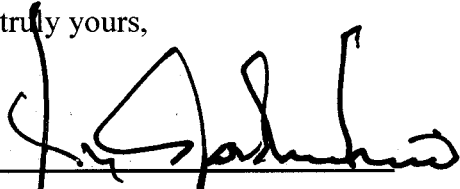
Ladies and Gentlemen:

This statement is filed pursuant to Department of Labor Regulations Section 2520.104-23 in order to satisfy the reporting requirement thereof if the arrangement described below should be deemed to constitute an employee pension benefit plan under the Employee Retirement Income Security Act of 1974, as amended.

Apex Bulk Carriers LLC, 140 Franklin Street, New York, New York 10013 (EIN: 11-3430280), maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Two (2) employees are in the plan.

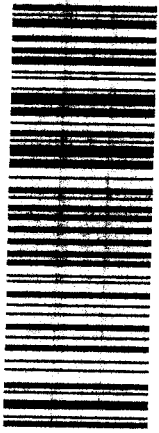
Very truly yours,



Member of the Committee

Apex Bulk Carriers, LLC
140 Franklin Street
New York, NY 10013

CERTIFIED MAIL™



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