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Certified Article Number
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SENDERS RECORD

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September 19, 2011

VIA CERTIFIED LETTER
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

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Re: Registration Statement for the Vessey and Company, Inc. Supplemental Executive Retirement Plan

Dear Sir or Madam:

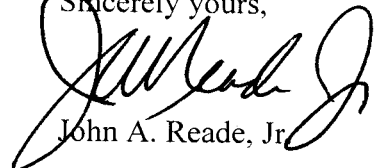
In accordance with Department of Labor Regulation §2250.104-23(b), I am filing a registration statement for the Vessey and Company, Inc. Supplemental Executive Retirement Plan (the "Plan"). The Plan is an unfunded pension plan for a select group of management employees or highly compensated employees and is eligible for the alternative method of compliance outlined in Department of Labor Regulation §2250.104-23. A total of two (2) employees are currently eligible to participate in the Plan. A copy of the Plan will be provided to the Secretary of Labor upon request.

The Plan is sponsored by:

Vessey and Company, Inc.
1605 East Zenos Road
PO Box 28
Holtville, CA 92250

The Plan Sponsor's Employer Identification Number is: 95-1580868.

If you have any questions regarding this matter, please contact me.

Sincerely yours,

John A. Reade, Jr.

DUANE MORRIS LLP

30 SOUTH 17TH STREET PHILADELPHIA, PA 19103-4196
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PHONE: 215.979.1000 FAX: 215.979.1020

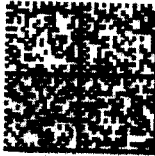
DuaneMorris*

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30 SOUTH 17TH STREET
PHILADELPHIA, PA 19103-4196

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