



October 31, 2011

Top Hat Plan Exemption  
Pension and Welfare Benefits Administration  
Room N-5644  
US Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

To Whom It May Concern:

The American Sugarbeet Growers Association maintains a plan for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Employer: American Sugarbeet Growers Association  
1156 15<sup>th</sup> Street, NW, Suite 1101  
Washington, DC 20005  
(202) 833-2398

EIN: 52-1065110

Number of plans: 1

Number of employees in each plan: 1

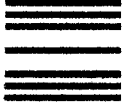
A handwritten signature in black ink, appearing to read "Luther Markwart".

Luther Markwart  
Executive Vice President

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