

October 21, 2011

EBSA/PUBLIC DISCLOSURE

2011 NOV 15 PM 2: 34

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

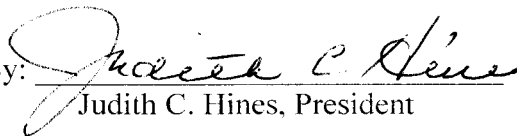
Re: Top Hat Plan Statement Pursuant to 29 C.F.R. 2520-104-23  
Employer: Hines & Associates, Inc.  
Address: 115 E. Highland Avenue, Elgin, IL 60120  
EIN: 36-3545085

Employer's Statement:

On October 21, 2011, Hines & Associates, Inc. adopted and now maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees, namely, one (1) plan named the Hines & Associates, Inc. Phantom Stock Plan currently for the benefit of eleven ~~(11)~~ <sup>10</sup> employees and two (2) consultants.

Hines & Associates, Inc., as the plan sponsor and Employer, will provide plan documents upon request.

Hines & Associates, Inc.

By:   
Judith C. Hines, President

Coman & Anderson, P.C.  
650 Warrenville Road, Suite 500  
Lisle, Illinois 60532

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