

August 17, 2012

VIA CERTIFIED MAIL

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

2012 AUG 23 PM 3:18
USPS/PUBLIC SERVICE

Re: System Property Development Company, Inc. Deferred Compensation Agreement

Gentlemen:

I am writing on behalf of the administrator of the above-referenced plan in order to satisfy the reporting and disclosure requirements of Part 1 of Title I of ERISA pursuant to Reg. §2520.104-23.

The following information is provided as required by Reg. §2520.104-23(b)(1):

- (1) Name and address of the employer:

System Property Development Company, Inc.
333 South Spring Street, Suite E1
Los Angeles, CA 90013-1200
- (2) EIN: 95-4440957

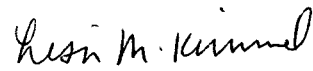
American Mutual Share Insurance Corporation maintains three (3) agreements primarily for the purpose of providing deferred compensation for management or highly compensated employees. Each of the three (3) agreements covers one (1) employee, and all three (3) are dated June 8, 2012.

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If any additional information is required, please contact me at the above address or telephone number.

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP



Lisa M. Kimmel

LMK:sav
cc: Cindy Holdorff

