



September 5, 2012

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

Re: Ewing-Foley, Inc. Phantom Stock Plan

Dear Sir or Madam:

Pursuant to Department of Labor Regulation §2520.104-23, this statement is filed in compliance with the reporting and disclosure requirements of Part 1 of Title I of the Employee Retirement Income Security Act of 1974. Ewing-Foley, Inc. maintains a deferred compensation plan for a select group of management or highly compensated employees. The following information is provided in accordance with DOL Regulations §2520.104-23(b)(1):

Ewing-Foley, Inc.  
10061 Bubb Road, Suite 100  
Cupertino, California 95014

Employer Identification Number: 94-1535556

It is hereby declared that Ewing-Foley, Inc. maintains a plan primarily of the purpose of providing deferred compensation for a select group of management or highly compensated employees.

The number of top-hat plans maintained by the Employer: One (1)

The number of Participants in this top hat plan is Five (5).



IS FIRMLY

PLEASE PRESS FIRMLY



**PRIORITY**  
**MAIL**  
POSTAL SERVICE

Envelope

ONS APPLY:

Consult the  
M) at [pe.usps.gov](http://pe.usps.gov)  
etails.

CLICK-N-SHIP FOR BUSINESS - LABEL TOTAL: \$7.25

<b>P</b>	U.S. POSTAGE REQUIRED		
	<b>USPS PRIORITY MAIL</b> ®		
<table border="0" style="width: 100%;"> <tr> <td style="width: 60%;">           CATHY CLEMENT            EWING-FOLEY INC.            10061 BUBB RD STE A            CUPERTINO CA 95014-4162         </td> <td style="width: 40%; text-align: right;">           SHIP DATE: 10/09/12            WEIGHT: 0 lb. 3 oz.            Ref#: Top Hat Plan Expiration         </td> </tr> </table>		CATHY CLEMENT EWING-FOLEY INC. 10061 BUBB RD STE A CUPERTINO CA 95014-4162	SHIP DATE: 10/09/12 WEIGHT: 0 lb. 3 oz. Ref#: Top Hat Plan Expiration
CATHY CLEMENT EWING-FOLEY INC. 10061 BUBB RD STE A CUPERTINO CA 95014-4162	SHIP DATE: 10/09/12 WEIGHT: 0 lb. 3 oz. Ref#: Top Hat Plan Expiration		
<p><b>SHIP TO:</b> EMPLOYEE BENEFITS SECURITY ADMIN          U.S. DEPARTMENT OF LABOR          200 CONSTITUTION AVE NW RM N-151          WASHINGTON DC 20210-0001</p> 			
<b>ZIP - e/ USPS SIGNATURE CONFIRM</b>			
			
<b>9121 9690 1038 3025 9688 24</b>			
<b>Electronic Rate Approved # 969010386</b>			



000014