



ENGINEERS, GEOLOGISTS & ENVIRONMENTAL SCIENTISTS

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VIA CERTIFIED MAIL

October 13, 2012

United States Department of Labor  
Employee Benefits Security Administration  
Top Hat Plan Exemption  
200 Constitution Ave., N.W., Ste N-1513  
Washington, D.C. 20210

Subject: Padre Associates, Inc. – Supplemental Executive Retirement Plan

Dear Sir or Madam:

In accordance with Department of Labor Regulation § 2520.104-23, this letter will service as the alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of the Employee Retirement Income Security Act of 1974, as amended, for a pension plan for a select group of management or highly compensated employees.

1. Padre Associates, Inc., a California corporation, (the "Sponsor") maintains and sponsors the Padre Associates, Inc. Supplemental Executive Retirement Plan (the "Plan").
2. The address of the Sponsor is 1861 Knoll Drive, Ventura, CA 93003
3. The employer identification number assigned by the Internal Revenue Service to the Sponsor is 77-0444582.
4. The Sponsor declares it maintains the following plan primarily for the purposes of providing deferred compensation for a select group of management or highly compensated employees.
5. There are currently 3 employees participating in the Plan.
6. A copy of the plan document will be furnished upon request.

Sincerely,

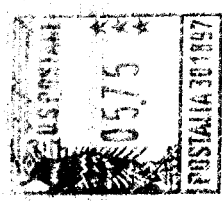
PADRE ASSOCIATES, INC.

Jeffrey T. Damron  
Principal

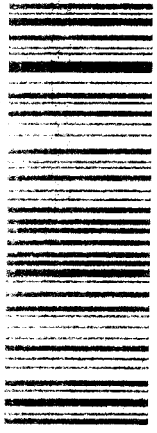
Attachments

**padre**  
**associates, inc.**

1861 Knoll Drive  
Venture, California 93003



# 000026418



7006 3450 0000 0463 0536

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