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EBBA/TNPLIS 01221 091 00
2012 DEC -4 PM 1:03

December 1, 2012

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

Re: Top Hat Plan Registration Statement

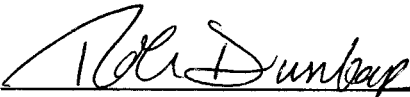
Dear Sir or Madam:

In accordance with 29 CFR Section 2520.104-23 of the Department of Labor Regulations, which provides an alternative method for complying with the reporting and disclosure requirements of Part 1 of Title I of the Employee Retirement Income Security Act of 1974, the above named Employer and plan administrator of the Ecumen 457(b) Eligible Deferred Compensation Plan (the "Plan") hereby declares that it maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees, and that all benefits provided by this Plan are paid as needed solely from the general assets of that Employer.

Employer's Name: Ecumen
Employer's Address: 3530 Lexington Avenue North, Shoreview, MN. 55126
Employer Identification Number: 41-0711588
Name of plan: Ecumen 457(b) Eligible Deferred Compensation Plan
Number of employees in plan: 11
Total Number of 457(b) Plans: 1

Very truly yours,

Plan Administrator, Ecumen Eligible 457(b) Deferred Compensation Plan

By:  Nov 28, 2012
(Robin Dunbar)

Its: Senior Vice President of Human Resources & Strategic Alignment

GP:3287341 v2



ECUMEN

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