



January 2, 2013

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

2013 JAN - 9 AM 11: 51

Re: Top Hat Exemption Statement

To whom it may concern,

Enclosed please find the Top Hat Exemption Statement for the TRACE International, Inc. 457(f) Plan. If I need to provide additional information, please let me know.

Regards,

A handwritten signature in cursive script that reads "Stacy L. Smith".

Stacy L. Smith
Manager, Operations and Partner Firms

Enc.

TOP HAT EXEMPTION STATEMENT

TO: Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U. S. Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210

FROM: TRACE International, Inc. (Employer/Plan Sponsor)
151 West Street (Suite 300)
Annapolis, Maryland 21401
EIN: 65-1162716

TRACE International, Inc. maintains the **TRACE International, Inc. 457(f) Plan** for the primary purpose of providing deferred compensation to a select group of management or highly compensated employees. There are four participants covered by this arrangement.

The TRACE International, Inc. 457(f) Plan is the only such arrangement maintained by TRACE International, Inc.

Dated this 20th day of December, 2012.

TRACE INTERNATIONAL, INC.

By: _____

(NAME)

Title: _____

PRESIDENT

ECN001111



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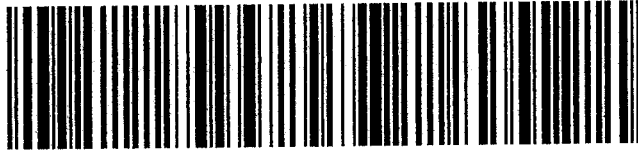
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SARA KILMON
TRACE INTERNATIONAL INC.
151 WEST ST STE 300
ANNAPOLIS MD 21401-2853

SHIP TO: TOP HAT PLAN EXEMPTION
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WASHINGTON DC 20210-0001

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