

1911 TRUST

February 20, 2013

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

2013 FEB 27 PM 1: 15
EBSA/PHILO/MS013

Dear Sir/Madam:

The following statement is intended to comply with the alternative method for satisfying the reporting and disclosure requirements of Part I, Title I of the Employee Retirement Income Security Act of 1974 for pension plans maintained for a select group of management or highly compensated employees, as described in Department of Labor regulation section 2520.104-23.

Name and Address of Employer:

The 1911 Trust Company, LLC
400 Essex Street
Beverly, MA 01915

Employer Identification Number:

27-0204770

Number of Plans of Deferred Compensation:

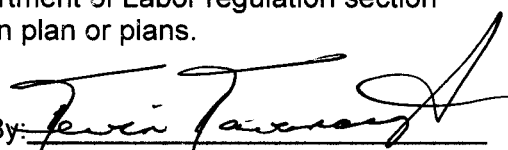
On January 23, 2013 the employer established The 1911 Trust Company, LLC Long-Term Incentive Plan an unfunded deferred compensation plan for a select group of management or highly compensated employees of the employer and certain affiliates of the employer (the "Plan").

Number of Employees in the Plan:

Two employees participate in the Plan.

Declaration:

The Plan is an unfunded plan that is maintained primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees of the employer and its subsidiaries. This statement is supplementary to, and does not replace or supersede, any statement or statements that the employer has previously filed under Department of Labor regulation section 2520.104-23 with respect to any other pension plan or plans.

By: 
Kevin Kavanaugh
President & Chief Investment Officer

400 Essex Street, PO Box 5600, Beverly, MA 01915 Ph 978-921-0452 Fx 978-927-6321 www.1911trust.com

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27-0204770

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Number of Employees in the Plan:

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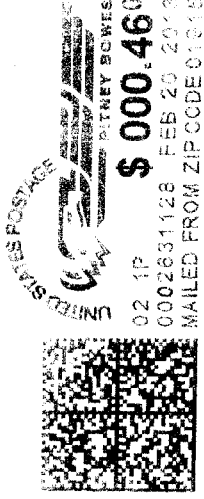
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