

Strasburger Price Oppenheimer Blend

ATTORNEYS AT LAW

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March 13, 2012

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VIA CERTIFIED MAIL

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

RE: James Environmental Management, Inc. Top Hat Plan Filing

Dear Sir or Madam:

Pursuant to Department of Labor Regulation § 2520.104-23, this statement is being filed on behalf of James Environmental Management, Inc. to inform the Secretary of the Department of Labor that James Environmental Management, Inc., EIN 74-2720140, whose principal address is: 600 Round Rock West Drive, Suite 201, Round Rock, TX 78681 has adopted the following unfunded plan of deferred compensation primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees:

James Environmental Management, Inc. Deferred Compensation Plan: 1 Employee.

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions.

Sincerely,

Brad Oxford

RBO/rl

cc: Mr. Mike James
Ms. Alison Flaum

1195094.1/SPSA/49241/0104/031313

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Figure 1

(a) **Preparation of the polymer solution.** The polymer was dissolved in water at 60°C under stirring. The solution was cooled to room temperature and filtered through a 0.45 µm filter. The solution was then dialyzed against distilled water for 48 h.

(b) **Polymerization of the polymer solution.** The polymer solution was placed in a vial and sealed. The vial was then heated to 60°C for 24 h. The resulting polymer was isolated by precipitation into methanol.

(c) **Characterization of the polymer.** The polymer was characterized by gel permeation chromatography (GPC), size exclusion chromatography (SEC), and Fourier transform infrared spectroscopy (FTIR).