

## LAW OFFICE OF BENNY R. VALEK

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August 8, 2013

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

2013 AUG 14 PM 12:00  
 ENNA/MS/ELC/MS/100

**Re: Alternative Method of Compliance with Reporting and Disclosure Requirements Pursuant to Section 2520.104-23 of the Department of Labor Regulations**

Dear Sir or Madam:

On behalf of J.G. Management Systems, Inc. ("Company"), we are hereby submitting the following information with respect to its top-hat plan, pursuant to DOL Regulation Section 2520.104-23:

**I. COMPANY NAME, ADDRESS AND TAXPAYER IDENTIFICATION NUMBER:**

J.G. Management Systems, Inc.  
 336 Main Street  
 Suite 207  
 Grand Junction, Colorado 81501  
 Taxpayer Identification Number: 84-1602906

**II. STATEMENT AS TO PLAN:**

The Company maintains the JGMS Management Incentive Plan ("Plan") for the benefit of a select group of management or highly compensated employees. The primary purpose of the Plan is to attract and retain qualified and competent employees upon whose efforts and judgment the Company's success is largely dependent. The Plan was adopted by the Company on July 31, 2013. There are no employees participating in the Plan at the current time. However, it is anticipated that five key employees will soon be selected to participate in the Plan.

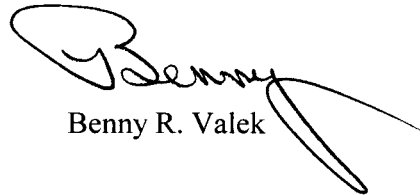
**III. ERISA COMPLIANCE:**

The Company is making this filing with respect to the Plan solely as a protective measure in the unlikely event that the Plan would be determined at some point to be an employee benefit plan as defined in Section 3(3) of ERISA. This form and this filing are not, and should not be construed as, an admission by the Company that the Plan is an employee benefit plan subject to ERISA for any purpose.

**IV. COPY OF AGREEMENTS:**

A copy of the Plan will be provided to the Department of Labor upon request.

Sincerely,



Benny R. Valek

BRV/sv

cc: Jerome Gonzales  
Keith Mahosky  
Owen Schmidt  
Brad Wright

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