

# The Onin Group

2520130091721

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August 7, 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 AUG 15 PM 4:13  
U.S. DEPARTMENT OF LABOR

Re: Statement Required for Alternative Method of Compliance Under 29 CFR  
2520.104-23

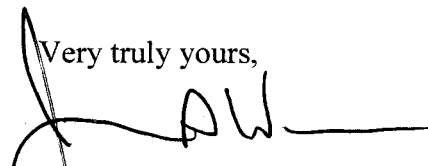
To Whom It May Concern:

The purpose of this filing is to serve as a statement under 29 CFR 2520.104-23 (the "Code"), which delineates an alternative method of compliance for pension plans for certain selected employees. As required by the Code, I have included the following information:

- Name and Address of Employer: Onin Staffing, LLC, 1 Perimeter Park South, Suite 450 N, Birmingham, Alabama 35242
- Employer Identification Number: 63-1180986
- Declaration: The Employer, Onin Staffing, LLC, maintains plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The number of such plans is five (5), and the number of employees in each is one (1).

Please do not hesitate to contact me if you have any questions or need more information from me.

Very truly yours,



James P. Weaver  
COO  
of Onin Staffing, LLC, Plan Sponsor



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