

# The Townsend Group

Skylight Office Tower, 1660 West Second Street, Suite 450  
 Cleveland, Ohio 44113 • Telephone 216-781-9090 • Facsimile 216-781-1407  
[www.townsendgroup.com](http://www.townsendgroup.com)

September 12, 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

HONORABLE  
 2013 SEP 17 AM 12:03

**RE: ALTERNATIVE REPORTING AND DISCLOSURE STATEMENT  
 FOR NONQUALIFIED DEFERRED COMPENSATION PLANS**

In compliance with the requirements of the alternative method of reporting and disclosure under Part I of Title I of the Employee Retirement Income Security Act of 1974 for unfunded or insured pension plans for a select group of management or highly compensated employees, specified in Department of Labor Regulations, 29 CFR Sec. 2520.104-23, the following information is provided by the undersigned administrator:

1. Employer's name: Townsend Holdings LLC (the "Employer")
2. Employer's mailing address: Skylight Office Tower  
1660 West 2<sup>nd</sup> Street, Suite 450  
Cleveland, OH 44113
3. Employer Identification Number: 45-3073569
4. Plan specifics:

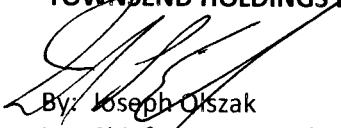
The Employer maintains four (4) plans, each for the purpose of providing deferred compensation to a select group of management and/or highly compensated employees. Each plan is unfunded; the deferred compensation (if any) is associated with funds the Employer may receive from a separate investment fund associated with that plan.

5. Number of plans, number of eligible employees:

There are four (4) plans; each plan covers sixteen (16) select management and highly compensated employees as eligible employees

The Employer will provide a copy of the agreement(s) to the Office of Employee Benefits Security Administration, upon request.

**TOWNSEND HOLDINGS LLC**

  
 By: Joseph Olszak  
 Its: Chief Operating Officer

From: (216) 781-9090  
Cheryl Gioitta  
Townsend  
1660 West Second Street  
Suite 450  
Cleveland, OH 44113

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**BILL SENDER**  
**Attn: Top Hat Plan Exemption**  
**Employee Benefits Security Admin**  
**200 Constitution Avenue, N.W.**  
**Room N 1513**  
**WASHINGTON, DC 20210**

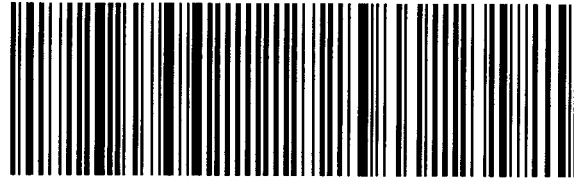
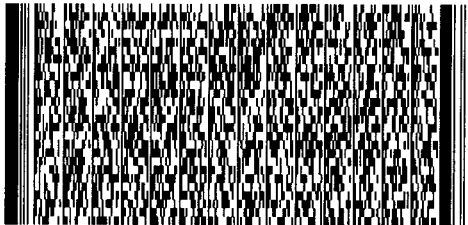
Ref # Top Hat Plan TTG  
Invoice #  
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Dept #

**FRI - 13 SEP AA**  
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