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December 9, 2013

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

**Re: West Michigan Horticultural Society, Inc.  
Alternative Compliance Statement**

Ladies and Gentlemen:

Enclosed for filing, on behalf of the employer identified above, is an alternative compliance statement for two unfunded pension benefit plans maintained primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Very truly yours,

VARNUM

Jeffrey A. DeVree

JAD/kp

Enclosure

cc: David Hooker, Dawn Kibben, West Michigan Horticultural Society (w/ enc)

### Alternative Compliance Statement

This statement is filed pursuant to section 2520.104-23 of the Labor Regulations as an alternative method of compliance with the reporting and disclosure requirements of Part 1 of Title I of the Employee Retirement Income Security Act of 1974 as amended.


The employer's name, address, and employer identification number are as follows:

West Michigan Horticultural Society, Inc.  
1000 East Beltline Avenue NE  
Grand Rapids, Michigan 49525  
EIN 38-2394044

The employer maintains two unfunded employee pension benefit plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. Four employees participate in one of the plans. One employee participates in the other plan.

December 3, 2013

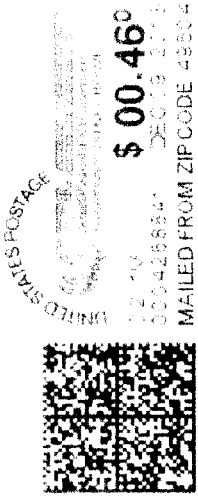
West Michigan Horticultural  
Society, Inc.

By 

David S. Hooker, President and CEO

**VARNUM**  
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