

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

February 28, 2014

RE: Statement Pursuant to
DOL Regs § 2525-104-23

1. The name and address of Employer is: Zena Associates, LLC
701 Ashland Avenue, Bldg. 22
Folcroft, PA 19032
2. Employer Identification Number is: 84-1684829
3. The Employer maintains a plan or plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
4. The Employer maintains one such plan, called the Zena Associates, LLC Incentive Compensation Plan (the "Plan"), in which there are two participants.
5. Plan documents will be provided to the Secretary of Labor upon request.

Respectfully submitted on behalf of
the Employer's Board of Directors,
as Plan Administrator

By: Andrea M. Guevara
Andrea M. Guevara, Chairman

Zena Assoc LLC
701 Ashland Ave.
Building 22, Ste 11
Folcroft, PA 19032

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