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Barry S. Swirsky
General Counsel
(610) 962-3791

July 23, 2014

Certified Mail

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

Re: Goddard Systems, Inc. Top Hat Plan Filing

Dear Sir or Madam:

Pursuant to Department of Labor Regulation § 2520.104-23, this statement is being filed on behalf of Goddard Systems, Inc. to inform the Secretary of the Department of Labor that Goddard Systems, Inc. (EIN 26-0004941), whose principal address is:

1016 W. Ninth Ave.
King of Prussia, PA 19406

has adopted on July 11, 2014 the following unfunded plan of deferred compensation, primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees:

Goddard Systems, Inc. 2013 Stock Appreciation Rights Plan

Seven (or less) employees to participate.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry Swirsky", written over a horizontal line.

Barry Swirsky
General Counsel

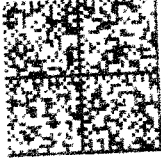
2014 JUL 23 PM 4:01
EBSA/PUBLIC/REGISTRATION

HOLDINGS, L.P.
CORPORATE CENTER
ROAD, SUITE 200
SSIA, PA 19406

CERTIFIED MAIL



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