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WINTHROP WEINSTINE
ATTORNEYS AND COUNSELORS AT LAW

August 4, 2014

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Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, D.C. 20210

Re: Airport & Aviation Professionals, Inc.

Dear Sir or Madam:

This constitutes the statement required by 29 C.F.R. Section 2520.104-23 to be filed with the Secretary of Labor with respect to the unfunded pension plans maintained for a select group of management or highly compensated employees of Airport & Aviation Professionals, Inc. (the "Company").

The Company currently maintains one program, the Airport & Aviation Professionals, Inc. Deferred Compensation Plan, that is maintained by the Company primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. This letter is also intended to constitute the filing required for any future similar plans that might be adopted by the Company or agreements that might be adopted for other members of a select group of employees of the Company.

The current number of employees eligible to participate in the plan is 2. Copies of the Plan will be provided to the Secretary upon request. The Company's address and employer identification number are:

Airport & Aviation Professionals, Inc.
5551 Ridgewood Drive, Suite 300
Naples, Florida 34108
EIN: 65-0094333

Please feel free to contact the undersigned if you require any additional information.

Sincerely,

WINTHROP & WEINSTINE, P.A.

By - 
Thomas A. Walker

Cc: Mr. Paul B. Demkovich

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