

KESWICK MANAGEMENT INC.

24th FLOOR • 99 PARK AVENUE • NEW YORK, NY 10016 • (212) 315-8300 • FAX: (212) 315-8350

December 22, 2014

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

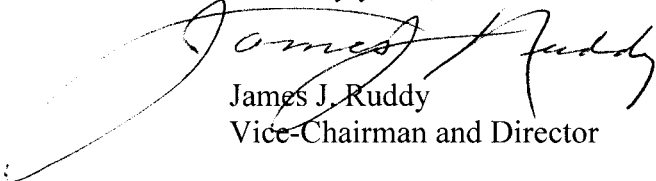
Dear Sir or Madam:

In accordance with Department of Labor regulation section 2520.104-23, the information set forth below is intended to satisfy the reporting and disclosure requirements set forth therein:

1. Name of Employer - Keswick Management Inc.
2. Address of Employer - 99 Park Avenue
24th Floor
New York, NY 10016-0313
3. Employer Identification Number - 13-3738889
4. The Employer maintains the Keswick Management Inc. Executive Deferred Compensation Plan ("Plan") primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
5. In addition to the Plan, the Employer maintains one other excess benefit plan.
6. Number of Employees in the Plan: 4

Please acknowledge receipt of this letter by stamping the extra copy enclosed and returning it in the envelope provided.

Sincerely yours,



James J. Ruddy
Vice-Chairman and Director

From: (212) 808-7621
Victoria E. Anderson, Esq.
Kelley Drye & Warren LLP
101 Park Avenue

Origin ID: JHCA



New York, NY 10178

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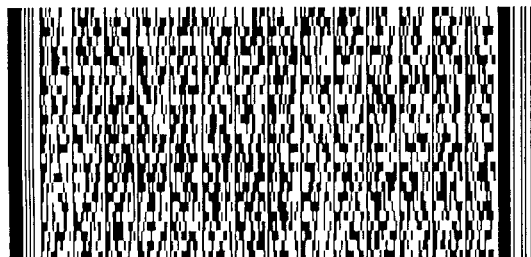
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Top Hat Plan Exemption, Room 1513
U.S. Department of Labor
Employee Benefits Security Admin
200 Constitution Avenue, NW
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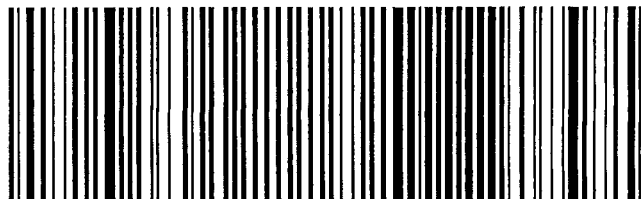
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