

December 11, 2014

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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

**RE: Rise, Incorporated**

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 agreements that might constitute one or more unfunded pension plans maintained for a select group of management or highly compensated employees of Rise, Incorporated (the "Company").

The Company currently maintains one agreement, which provides deferred compensation to an employee of the Company who is part of a select group and 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 agreements that might be adopted for other members of a select group of employees of the Company.


The current number of employees covered by the agreement is 6. Copies of the agreement will be provided to the Secretary upon request. The Company's address and employer identification number are:

Rise, Incorporated  
8406 Sunset Road NE  
Spring Lake Park, Minnesota 55432  
EIN: 41-0972476

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

Sincerely,

WINTHROP & WEINSTINE, P.A.



Thomas A. Walker

Cc: Ms. Lynn Noren  
Mr. Thomas Haglund

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