



JAMES L. HAUSER
 direct dial: 617-856-8130
 fax: 617-289-0506
 jhauser@brownrudnick.com

One
 Financial
 Center
 Boston
 Massachusetts
 02111
 tel 617.856.8200
 fax 617.856.8201

January 6, 2015

Via Certified – Return Receipt Requested 7160 3901 9846 3898 5773

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

RE: Vontobel Asset Management, Inc. Deferred Bonus Plan

Dear Sir or Madam:

Pursuant to Department of Labor Regulation § 2520.104-23 (“**DOL Regulation**”), this statement is being filed on behalf of Vontobel Asset Management, Inc. (the “**Employer**”) to inform the Secretary of the Department of Labor that the Employer adopted the Vontobel Asset Management, Inc. Deferred Bonus Plan (the “**Plan**”), effective as of January 1, 2014 (the “**Effective Date**”). The Employer maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Name of Employer:	Vontobel Asset Management, Inc.
EIN Number:	13-3223264
Address:	Vontobel Asset Management, Inc. 1540 Broadway, 38th Floor New York, NY 10036
Telephone Number:	(212) 415-7052
Name of Plan:	Vontobel Asset Management, Inc. Deferred Bonus Plan
Number of participants in the Plan as of the Effective Date:	13
Number of other similar plans maintained:	1
Number of participants in other similar plan:	1

This Notice is being filed in accordance with the Delinquent Filer Voluntary Compliance Program.. Further information about the Plan, including a copy of the document, will be provided to the Secretary upon request. Please address any inquiries to my attention.

Sincerely,

BROWN RUDNICK LLP

By:


James L. Hauser

JLH/keh
cc: Peg McGovern

POWER OF ATTORNEY

Vontobel Asset Management, Inc. (the "**Corporation**") hereby grants to James L. Hauser, Esq. of Brown Rudnick LLP ("**Brown Rudnick**") a limited Power of Attorney to represent the Corporation before the United States Department of Labor ("**DOL**"), regarding all matters related to the Corporation's filing of a top-hat exemption letter, Forms 5500 under the Delinquent Filer Voluntary Compliance Program ("**DFVC Program**") and any other matters before the DOL, with respect to the Corporation's Deferred Bonus Plan or its employment agreement with its Chief Investment Officer (the "**Employment Agreement**"). This limited Power of Attorney grants to Brown Rudnick the authority, without limitation, to communicate, negotiate, or appear before the DOL on behalf of the Corporation solely with respect to the matters listed above and to submit all documentation under the DFVC Program on the Corporation's behalf. This limited Power of Attorney shall remain in effect until such time as the DOL indicates approval and acceptance of the top-hat exemption letter and the DFVC Program filing and any other matters relating to the Corporation's Deferred Bonus Plan or Employment Agreement, or until it is otherwise revoked at any time upon immediate written notice by the Corporation or Brown Rudnick.

Dated: 12/16/2014

By: M. McEwen

Name: Margaret McEwen

Title: Head of HR

Power of Attorney is hereby accepted:

BROWN RUDNICK LLP

Dated: 1/6/2015

By: James L. Hauser
James L. Hauser

CERTIFIED MAIL

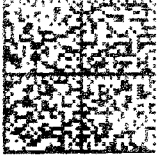


7160 3901 9846 3898 5773

RETURN RECEIPT REQUESTED

25973/SJM
BROWNRUDNICK
One
Financial
Center
Boston
Massachusetts
02111

U.S. Department of Labor
Employee Benefit Security Admin.
Top Hat Plan Exemption
200 Constitution Ave., NW, N01513
Washington, DC 20210



UNITED STATES POSTAGE
EIGHT DOLLARS
\$ 08.890
MAILED FROM ZIP CODE 02111

