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Deborah L. Baughman
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2520153420027

November 19, 2015

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7015 0640 0007 2408 8165

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: Alternative Method of Compliance with Reporting and Disclosure under ERISA

Dear Madam or Sir:

On behalf of our client, HHJ Holdings, LTD., and in accordance with 29 C.F.R. Sec. 2520.104-23, we are submitting the following statement for an unfunded pension plan under ERISA, established primarily for the purpose of providing deferred compensation for a management employee of Ajax Paving Industries, Inc., a wholly owned subsidiary.

Employer: Ajax Paving Industries, Inc.
830 Kirts Boulevard
Suite 100
Troy, Michigan 48084

Employer Identification Number: 38-1383205

On November 6, 2015, the employer established a plan primarily for the purpose of providing deferred compensation for a select management employee.

Number of Top Hat Plans: 1

November 19, 2015

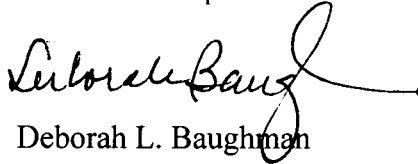
Page 2

Number of covered employees in each: 1

If you have any questions or desire further information, please contact me.

Sincerely,

Jaffe, Raitt, Heuer & Weiss
Professional Corporation



Deborah L. Baughman

cc: Administrator

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Jaffe
JAFFE SAITT HELER & WEISS
A Professional Corporation
Attorneys at Counselors

DLB/pw

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

RETURN RECEIPT
REQUESTED

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