


WINTHROP WEINSTINE
ATTORNEYS AND COUNSELORS AT LAW

2520160710103

February 8, 2016

Thomas A. Walker
Direct Dial: (612) 604-6568
Direct Fax: (612) 604-6968
twalker@winthrop.com

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: Saint Paul Commodities, 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 agreements that might constitute one or more unfunded pension plans maintained for a select group of management or highly compensated employees of Saint Paul Commodities, Inc. and its affiliates, including but not limited to Greentree Holdings, Inc. (collectively, the "Company").

The Company currently maintains one agreements, each of 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.

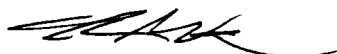
The current number of employees covered by the agreement are one (1). A copy of the agreement will be provided to the Secretary upon request. The Company's address and employer identification number are:

Saint Paul Commodities, Inc.
6235 – 78th Lane
Loretto, Minnesota 55357-8727
EIN: 26-1471719

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

Sincerely,

WINTHROP & WEINSTINE, P.A.



Thomas A. Walker

Cc: B. Shane Grutsch

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