
SHERMAN & HOWARD

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Kathleen A. Odle
Sherman & Howard L.L.C.
Direct Dial Number: 303.299.8116
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2520162670022

September 1, 2016

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

ESSA/PUBLIC DISCLOSURE
2016 SEP - 8 PM 4:44

Re: Adoption of Deferred Compensation Plan

Dear Sir or Madam:

In compliance with Department of Labor Regulation Section 2520.104-23, notice hereby is given that the employer named below has adopted a deferred compensation arrangement for the benefit of a select group of management or highly compensated individuals. The information requested by that regulation is as follows:

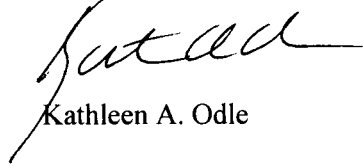
1. Name and Address of Employer: Total Longterm Care Solutions, LLC
dba InnovAge-Lowry
8950 E. Lowry Blvd.
Denver, CO 80230
2. Name of Plan: InnovAge Deferred Compensation Plan
3. Employer's EIN: 37-1547964

4. Declaration: The employer hereby declares that the deferred compensation plan is maintained primarily for the purpose of providing deferred compensation for a select group of management or highly compensated individuals. The employer currently maintains one such plan and this plan currently benefits 16 employees.

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If you have any questions concerning the above, please let me know.

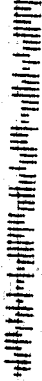
Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen A. Odle", written in a cursive style.

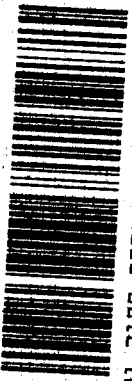
Kathleen A. Odle

KAO:LAG

cc: Ms. Vanessa D. Walton



CERTIFIED MAIL



92 7199 9991 7034 0057 9915

S&H SHERMAN
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