

BARTON ASSOCIATES, INC.
SUSQUEHANNA COMMERCE CENTER, NORTH BUILDING
221 WEST PHILADELPHIA STREET
YORK, PA 17401

December 28, 2018

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RECEIVED
DEC 28 2018

Personal & Confidential
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

Re: Alternative Method of Compliance with Reporting and Disclosure Requirements
Pursuant to Section 2520.104-23 of the Department of Labor Regulations

Dear Sir or Madam:

This statement is filed in accordance with the requirements of the above-captioned regulations and in lieu of Internal Revenue Service Form 5500:

Employer Name, Address and Taxpayer Identification Number

Barton Associates, Inc.
Susquehanna Commerce Center, North Building
221 West Philadelphia Street
York, PA 17401
EIN: 23-1705429

Statement as to Plan

The Employer maintains, at the above address, the Barton Associates, Inc. Management Incentive Plan (the "Plan") primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. At present, 5 employees participate in the Plan.

ERISA Compliance

The Employer is making this filing solely as a protective measure in the unlikely event its Plan should be determined at some point to be an employee benefit plan as defined in section 3(3) of ERISA. This form and this filing are not, and should not be construed as, an admission by the Employer that the Plan is an employee benefit plan subject to ERISA for any purpose.

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Employee Benefits Security Administration
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Barton Associates, Inc.

Copy of Plan

A copy of the Plan will be provided to the Department of Labor upon request.

Sincerely,

Barton Associates, Inc.

A handwritten signature in black ink, appearing to read "M. S. Rader", with a long, sweeping horizontal line extending to the right.

Michael S. Rader, Chief Executive Officer

