

2520210630003

**ALTERNATE REPORTING AND DISCLOSURE STATEMENT  
FOR NONQUALIFIED DEFERRED COMPENSATION PLANS  
FOR A SELECT GROUP OF MANAGEMENT  
OR HIGHLY COMPENSATED EMPLOYEES**

To the Secretary of Labor:

Effective December 9, 2020, RTO PA, a Minnesota corporation, adopted a Nonqualified Deferred Compensation Plan ("Plan") that provides deferred compensation benefits to key employees. The Plan provides that deferred compensation benefits become payable upon such employees' separation from service, or upon other events described in the Plan.

RTO PA, believes that the Plan constitutes a "pension plan" under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), and provides the following information to comply with the alternative method of reporting and disclosure for unfunded plans maintained for a select group of management or highly compensated employees pursuant to 29 C.F.R. § 2520.104-23, under Section 110 of Title I of ERISA.

Name and Address of Employer: RTO PA  
16403 Haven Road  
Little Falls, Minnesota 56345

Employer Identification Number: 41-1737335

RTO PA, maintains one (1) or more plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Number of Plans and Participants in Each Plan:

One (1) plan covering one (1) employee, Roxanne C. Thompson.

Dated: February 14, 2021

RTO PA

By: T.D. Oll  
\_\_\_\_\_, Plan Administrator



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**Sent via Certified Mail**

February 15, 2021

SECRETARY OF LABOR  
 TOP HAT PLAN EXEMPTION  
 EMPLOYEE BENEFITS SECURITY ADMINISTRATION  
 ROOM N-1513  
 US DEPARTMENT OF LABOR  
 200 CONSTITUTION AVENUE NW  
 WASHINGTON DC 20210

RE: RTO PA, Nonqualified Deferred Compensation Agreement with Roxanne C. Thompson  
 Our File No. 712317

Dear Madam/Sir:

Please find enclosed an Alternate Reporting and Disclosure Statement for Nonqualified Deferred Compensation Plans for a Select Group of Management or Highly Compensated Employees for RTO PA, a Minnesota corporation.

In the event you have any questions or concerns regarding the enclosed, please contact the undersigned directly.

Sincerely,

LATHROP GPM LLP

Steven B. Kutscheid  
 Attorney  
 SBK/nas  
 Enclosure

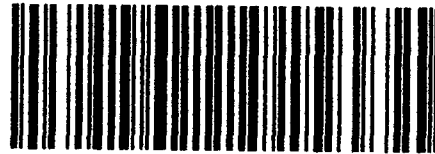
cc: Roxanne C. Thompson

US DEPARTMENT OF  
 LABOR  
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 EBSA  
 PUBLIC DISCLOSURE



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**CERTIFIED MAIL**



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SECRETARY OF LABOR  
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