SHEET METAL WORKERS LOCAL PENSION PLAN

APPLICATION ON RESUBMISSION FOR APPROVAL OF SUSPENSION OF BENEFITS UNDER THE MULTIEMPLOYER PENSION REFORM ACT OF 2014

MARCH 31, 2019

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SECTION 1. BACKGROUND AND PROCEDURE

The Board of Trustees of the Sheet Metal Workers Local Pension Fund (the "Plan") submits this application and the accompanying Exhibits to the Secretary of the Treasury for approval of a proposed suspension of benefits. The application is made pursuant to Internal Revenue Procedure 2017-43 (the "Revenue Procedure") and the Department of the Treasury's final regulations issued under § 432(e)(9) of the Internal Revenue Code of 1986 (the "Code") as published in the Federal Register on April 28, 2016 (the "Regulations").

Under §432(e)(9)(G) of the Code the Secretary of the Treasury shall approve an application for the approval of suspension of benefits upon finding that the Plan is eligible and has satisfied the criteria of subparagraphs (C), (D), (E) and (F) of §432(e)(9) of the Code. As set out in detail below, the Plan is eligible to suspend benefits and has satisfied each of the criteria under the Regulations. This is a resubmission application pursuant to §432(e)(9)-1(g)(3) of the Regulations. On December 14, 2018, a representative of the Department of the Treasury affirmed to the Plan that its initial application (filed on March 31, 2018, and which was withdrawn on October 4, 2018, by way of a letter dated October 2, 2018) is a candidate for resubmission review. The Plan respectfully requests that the Secretary approve this resubmission application (hereafter "application") to suspend benefits.

SECTION 2. APPLICATION PROCEDURES

2.01 Application submitted by plan sponsor.

This application for approval of a proposed benefit suspension is submitted by the Plan Sponsor as defined at §432(j)(9) of the Code and as required under the Regulations. The application is signed by the current Chairman Trustee of the Plan who is so authorized under the Plan's agreement and declaration of trust and the letter of authorization executed by the full Board of Trustees for purposes of the application.

2.02 Term of the plan's proposed suspension of benefits.

(1) Effective date.

The Trustees of the Plan propose to make the suspension effective (the "Effective Date") after the application has been approved and the result of the participant vote has been determined, on the first day of the next Plan Year beginning after the approval, May 1, 2020.

(2) Expiration date.

The proposed suspension shall remain in effect indefinitely. It will not expire by its own terms.

(3) The proposed suspension.

The application proposes that there shall be a reduction in monthly benefits such that the revised monthly amount is based upon a specific percentage reduction of a participant's benefit depending upon into which "group" of participants an individual is categorized. The proposed reductions are subject to the individual limitations described in §432(e)(9)(D)(i), (ii), and (iii) and aggregate limitations described in §432(e)(9)(D)(iv).

The groups defined for purposes of this application and the proposed percentage reduction in their benefits are:

		Proposed Suspension
Non-Active Participants	**Retirement Date**[1]	**Reduction**
Group 1	Before August 1, 2009[2] and all Terminated Vested Participants	35%
Group 2	On or after August 1, 2009	30%
Active Participants	**Hire Date**	
Group 3	Before May 1, 2006[3]	25%
Group 4	On or after May 1, 2006	No reduction

Active Participants are Plan Participants who worked at least 435 hours during the plan year ended April 30, 2017 or April 30, 2018 and who have not retired as of April 30, 2018. Non-Active Participants include Terminated Vested Participants, Retired Participants, Disabled Participants, Beneficiaries of Participants, and Alternate Payees.

The proposed suspension as described above will impact the Plan population as follows[4]:

45% of Active Participants will have a benefit reduction (296 of 655),
76% of Terminated Vested Participants[5] will have a benefit reduction (287 of 379)
65% of Retired Participants will have a benefit reduction (265 of 408)
0% of Disabled Participants will have a benefit reduction (0 of 16)
29% of Beneficiaries of Participants will have a benefit reduction (26 of 89), and
76% of Alternate Payees will have a benefit reduction (13 of 17)

Of the total Plan population (1,564 individuals), 57% will experience a reduction. 43% will experience no reduction.

The average percentage reduction per class of Plan Participant, excluding those with no reduction, is:

[1] Member's Retirement Date for Beneficiaries of Retired Participants and for Alternate Payees of shared-payment QDROs.
[2] Effective date of the Plan's Rehabilitation Plan.
[3] Effective date of the Plan's amendment reducing the rate of accrual from 2.2% to 0.36% of contributions.
[4] Analysis based on census data used for the May 1, 2017 actuarial valuation.
[5] Includes two participants with deferred benefits based on disability.

Active Participants	-	19.6%
Terminated Vested Participants	-	20.7%
Retired Participants	-	18.7%
Disabled Participants	-	0%
Beneficiaries of Participants	-	8.8%
Alternate Payees	-	12.5%

The average percentage reduction across the entire affected portion of the participant population is approximately 19.3%. Notably, under the Plan's withdrawn initial application the average percentage reduction was approximately 27%. The decrease in the average percentage reduction is due to the fact that the revised suspension methodology affects a larger proportion of the Plan's population, thereby lowering the average reduction required per participant among affected individuals. The Trustees note that there is a larger population of Non-Active Participants (909) than there are of Active Participants (655)[6] and, although numerically more Non-Active Participants are affected, their average percentage reduction is slightly lower than that of Active Participants. Relatedly, a larger proportion of the Non-Active participant population is protected from suspensions by the individual limitations, resulting in a slightly lower average percentage reduction for affected Non-Actives compared to affected Actives. The Trustees also note that of the 290 Active Participants who are affected, 202 will experience a full 25% reduction. These are Participants who were hired before May 1, 2006 and accrued their vested benefits under the Plan's higher accrual rate structures.

2.03 Penalties of perjury statement. *See*, **Exhibit 1.**

2.04 Public disclosure statement. *See*, **Exhibit 1.**

SECTION 3. DEMONSTRATION THAT THE PLAN IS ELIGIBLE FOR SUSPENSION

3.01 Plan actuary's certification of critical and declining status.

The Plan actuary's required certification (issued July 27, 2018) is found at **Exhibit 2** to the application as required under Code §432(b)(3)(A). The Plan is certified as being in critical and declining status for the Plan Year beginning May 1, 2018. The certification is supported by the May 1, 2017 actuarial valuation (issued March 22, 2018) and **Exhibit 4**, the actuary's *Supplemental Information to Actuarial Certification for the Plan Year Beginning May 1, 2018* (issued March 29, 2019), which includes a year-by-year projection of the Plan's available resources and the benefits under the Plan demonstrating that the Plan is projected to become insolvent during the Plan Year beginning May 1, 2033. The documentation includes descriptions of the assumptions and methods applied. The year-by-year projection separately identifies the market value of assets as of the beginning and end of the Plan Years beginning May 1, 2017 though April 30, 2034, and the following cash-flow items for those years: (1) employer contributions, (2) withdrawal liability payments, (3) benefit payments (by category), (4) administrative expenses, and (5) investment returns.

[6] Indeed, the "mature" quality of the Plan's population was and is a substantial driver of its forecast insolvency.

3.02 Plan actuary's certification that the plan is projected to avoid insolvency.

Exhibit 4 is the Plan actuary's *Report of Required Actuarial Information – Application for Proposed Benefit Suspension as of May 1, 2020.* This certification (dated March 29, 2019) includes at Part C. the actuary's *Deterministic Projection of Current Plan Without Proposed Suspension.* Part C. includes a year-by-year solvency projection that demonstrates that the Plan will become insolvent in the Plan year beginning May 1, 2033. Part D. *Deterministic Projection of Proposed Suspension* of the certification satisfies the requirements of §432(e)(9)(C)(i) by providing a year-by-year projection demonstrating that with the proposed suspension taking effect on May 1, 2020, the Plan is projected to avoid insolvency within the meaning of Code § 418E. The *Report* also separately identifies the available resources during each year and the market value of assets and changes in cash flow.

3.03 Plan sponsor's determination of projected insolvency.

The Trustees of the Plan have made a prudent determination under Code §432(e)(9)(C)(ii), after consideration of all of the available information and possible plan changes that the Plan is projected to become insolvent unless benefits are suspended as proposed in the application. The Trustees have determined this to be so even though they have taken all reasonable measures to avoid insolvency. The Trustees determination of projected insolvency includes consideration of all measures taken to avoid insolvency over the past 10 plan years, as discussed below.

On July 1, 2009, the Plan's actuary certified the Plan's funding status as critical for the 2009 Plan Year. The Plan was considered to be in critical status because the funded percentage was 47.2% and there were projected funding deficiencies starting at the end of the 2009-2010 Plan Year. The decline in funding that lead to this certification was largely a function of the crisis in the financial markets in 2008, and the "Great Recession" that followed, which resulted in a reduction in work hours.

In the years since being first certified as "critical" under the PPA the Trustees have adopted steps under the auspices of a Rehabilitation Plan and further "all reasonable measures" intended to forestall insolvency and improve the funding status of the Plan. The Plan was certified as "critical" under the PPA in each plan year from 2009 through 2015. For 2016, the Plan was certified to be in "critical and declining" status based on a projected insolvency in the 2033-34 plan year and a funded percentage of 53.6%. For 2017 and 2018, the Plan continued to be certified to be in critical and declining status, with a funded percentage of 43% and 41.4%, respectively.

The Trustees adopted a Rehabilitation Plan as required under PPA and further availed the Plan of the ability under Code § 432(e)(3)(A)(ii) to reduce all of the Plan's adjustable benefits, including the future accrual of benefits, in order to take "all reasonable measures" to forestall insolvency.

The Trustees have now reasonably and prudently determined that notwithstanding those steps, the Plan cannot be projected to avoid insolvency if the proposed suspension of benefits is not approved and applied to the Plan.

3.04 Consideration of Specific Plan Factors.

(1) The determination that all reasonable measures have been taken to avoid insolvency includes the consideration of the Plan factors specified in Section 432(e)(9)(C)(ii) for the 10 plan years immediately preceding 2019.

(a) Current and past contribution levels.

Contribution rates have increased by at least 50% of the pre-2009 levels due to the Rehabilitation Plan. Under the preferred schedule to the Plan's Rehabilitation Plan there were cumulative contribution increases of 10% in 2009, 2010, and 2011. In 2012, there was a contribution rate increase of 14%. These contribution rate increases resulted in significant wage deferments to the Plan by its active participants and have made it very difficult for signatory contractors to remain competitive in the sheet metal construction market. The Trustees believe that additional contribution rate increases will result in a loss of members by the Union and will make it extremely difficult for the Union to attract new members. This could result in a decrease in future contributions to the Plan and, if that were to occur, cause a net decrease in future funding of the Plan. Further contribution rate increases are therefore counterproductive to the goal of avoiding insolvency.

(b) Levels of benefit accruals including any prior reductions in the rate of benefit accruals.

The future benefit accrual rate has been reduced multiple times since 2003 and was frozen effective August 1, 2013. The table below contains the history of percentage of contribution accrual rates under the Plan from May 1, 1983, through August 1, 2013 (for service after which date the accrual rate is 0.0%).

Retirement/ Termination Date	**% of Employer Contribution Accrual Rate**
May 1, 1983 – April 30, 1984	2.6%
May 1, 1984 – April 30, 1987	2.8%
May 1, 1987 – April 30, 1990	3.0%
May 1, 1990 – April 30, 1994	3.5%
May 1, 1994 – April 30, 2003	3.65%
May 1, 2003 – April 30, 2006	3.65% of contributions through April 30, 2003; plus 2.2% of contributions from May 1, 2003 through April 30, 2006.
On or after August 1, 2009	3.65% of contributions through April 30, 2003; plus 2.2% of contributions from May 1, 2003 through April 30, 2006; plus .36% of contributions from May 1, 2006 through July 31, 2013; plus 0% of contributions after August 1, 2013.

(c) Prior reductions of adjustable benefits under Section 432(e)(8).

The benefit reductions in the Plan's Rehabilitation Plan include all permissible adjustable benefit reductions, excepting an increase to the Plan's normal retirement age.

(d) Prior suspension of benefits under Section 432(e)(9).

Not applicable as the Plan has not had a prior suspension of benefits under Section 432(e)(9).

(e) Measures taken to retain or attract contributing employers.

At present, any would-be contributing employer is faced with participation in a Plan that is projected to become insolvent, that imposes a substantial contribution rate, and for which new participants will accrue a 0% future benefit notwithstanding the deferral of wages into the Plan as contributions. Additionally, any would-be employer who commences participation in the Plan could face withdrawal liability. Under these circumstances, it is the belief of the Trustees that rational employers face a difficult decision in determining whether to sign a CBA that requires contributions to the Plan. Ameliorating this view is the fact hat the CBAs under which contributions are made to the Plan include a menu of fringe benefits of which the Plan is but one of several. For example, for all new CBA employees, employers are required to contribute to the Sheet Metal Workers National Plan as well as a defined contribution plan and other fringe benefits. The financial position of the Plan standing alone makes it difficult to attract new long term participating employers. However, taken in conjunction with the other CBA-required fringes the Plan has in fact been able to maintain and modestly increase its contributing employer base since the reduction of the future benefit accrual rate to 0.0%,[7] supporting the reasonableness of the expectation that the contribution base units will ultimately remain stable that are part of the proposed suspension of benefits.

The Trustees are committed to retaining the contribution base that the Plan has. This is reflected in their determination not to seek additional contribution rate increases from the existing employers, which could foresee-ably lead to employer bankruptcies and possible uncollectible withdrawals. That there have been new employers signatory to the CBAs since 2013 and since the Plan's 2018 application, is objectively a confirmation of the prudence of the Trustees' approach to the issue. Specifically, subsequent to the filing and withdrawal of the Plan's initial application to suspend benefits four new contributing employers have commenced participation in the plan.[8]

(2) The impact on plan solvency of the subsidies and ancillary benefits available to active participants.

As noted above, all adjustable benefits have been eliminated under the Rehabilitation Plan, excepting an increase to the Plan's normal retirement age.

[7] Confirmation of this was provided to Treasury in a supplemental response to post-application questions.
[8] The four employers who commenced contributing subsequent to March 1, 2018 are identified in the list of current contributing employers, Exhibit 8 to the application.

(3) Compensation levels of active participants relative to employees in the participants' industry generally.

Sheet Metal Workers Local Union #33 represents over 4,500 skilled craftsmen throughout most of Ohio and West Virginia. Hourly wage rates for active participants in the Plan were on average $25-$27/hour in 2017. The average national hourly wage in 2017 for Sheet Metal Workers was $25.05/hour. The 2017 average hourly wage for Sheet Metal Workers in Akron Ohio was $24.25/hour and $26.19/hour in the Wheeling, West Virginia according to the Bureau of Labor & Statistics ("BLS") study published in March 2018.

(4) Competitive and other economic factors facing contributing employers.

Significant contribution increases to the Plan have been made by signatory contractors since May, 2008 (See, **Exhibit 10**, Narrative Statement). This has resulted in significant wage deferments by members. These significant contribution increases have made it very difficult for signatory contractors to remain competitive in the sheet metal construction market.

How Plan factors were taken into account/other factors considered

- The impact of benefit and contribution levels on retaining active participants and bargaining groups under the plan.

With reference to the descriptions above, the Trustees observe that current active participants are making significant wage deferments to the Plan but are not accruing any additional pension benefits. Any further increase in the contribution rate would likely result in employer withdrawals and a loss of members by the Union.

- The impact of past and anticipated contribution increases under the plan on employer attrition and retention levels.

With reference to the description above, there are no further plans to increase the required contribution rate as such an action is reasonably anticipated to have a significantly detrimental impact on the Plan's future funding.

SECTION 4. DEMONSTRATION THAT THE PLAN'S PROPOSED SUSPENSION SATISFIES THE STATUTORY REQUIREMENTS

4.01 Demonstration that limitations on individual suspensions are satisfied.

Exhibit 6 to the application demonstrates how the proposed suspension satisfies the limitations described in Code § 432(e)(9)(D)(i), (ii) and (iii). Section 4.01 of Revenue Procedure 2017-43 requires information demonstrating that certain statutory limitations with respect to the proposed suspension are satisfied. The limitations set forth in Section 4.01 are satisfied based upon the following (summarized) individual demonstrations.

(1), (2) and (3) Sample Calculations

- Example 1A - Group 1 individual currently receiving benefits below 110% PBGC Guarantee (including contingent beneficiary)

- Example 1B - Group 1 individual currently receiving benefits reduced to 110% PBGC Guarantee (including contingent beneficiary)
- Example 1C - Group 1 individual currently receiving benefits between age 75 and 80 and limited by 110% PBGC Guarantee (including contingent beneficiary)
- Example 1D - Group 1 individual currently receiving benefits based on disability (pre-5/1/1995 disability award) (including contingent beneficiary)
- Example 1E - Group 1 future retiree below 110% PBGC Guarantee
- Example 1F - Group 1 future retiree reduced to 110% PBGC Guarantee
- Example 1G - Group 1 future retiree between ages 75 and 80
- Example 1H - Group 1 future retiree with benefits based on disability (post 5/1/1995 disability award)
- Example 2A - Group 2 individual currently receiving benefits between age 75 and 80 (including contingent beneficiary)
- Example 2B - Group 2 individual currently receiving benefits between age 75 and 80 and limited by 110% PBGC Guarantee*
- Example 2C - Group 1 individual currently receiving benefits based on disability (post 5/1/1995 disability award) (including contingent beneficiary)
- Example 3A - Group 3 future retiree below 110% PBGC Guarantee
- Example 3B - Group 3 future retiree reduced to 110% PBGC Guarantee

* There are no participants that fit this criterion who have a contingent beneficiary.

Note that that all participants in Groups 3 and 4 are under age 75 as of May 31, 2020; therefore there are no demonstrations to be included for those groups.

The proposed suspension does not affect any participant or beneficiary that is at least 80 as of May 31, 2020.

In determining the extent to which any participant's benefit will be reduced pursuant to the proposed suspension, no participant's monthly guaranteed benefit as calculated under §4022A of ERISA is reduced on account of any of the following limitations or exclusions:

(a) The Section 4022A(a) exclusion of certain forfeitable benefits;

(b) The Section 4022A(b)(1)(A) exclusion of certain benefits and benefit increases in effect for less than 60 months;

(c) The limitations contained in the section 4022A(c)(2) definition of the accrual rate used for calculating the monthly guaranteed benefit in order that the accrual rate is based on a benefit that is no greater than the monthly benefit payable under the Plan at normal retirement age in the form of a single life annuity and is calculated without regard to any reduction under

§411(a)(3)(E) of the Code, divided by the participant's years of credited service through the date that future benefit accruals were suspended (limited to 1 year for any one year of participation);

(d) The Section 4022A(d) limitation that the guaranteed benefit will not exceed the benefit calculated under the Plan as reduced under §411(a)(3)(E) of the Code; and

(e) The Section 4022A(e) exclusion, pursuant to §4022(b)(6) of benefits that would not be guaranteed if paid under a single employer plan.

(2) Disability.

The proposed suspension does not affect any participant or beneficiary under the Plan that was awarded a disability pension. The Plan currently does not offer a disability benefit to current active participants. Effective September 1, 2013, the Plan's disability benefit was eliminated as part of the Rehabilitation Plan adopted under the Pension Protection Act of 2006.

For participants that earned at least 10 years of service and became qualified for a Social Security disability benefit* before September 1, 2013, the Plan paid a temporary disability benefit payable until age 55. The amount of the benefit was 80% of the participant's accrued benefit (100% of accrued benefit for participants that became disabled before May 1, 1995) payable as a single life annuity.

*The Social Security disability award requirement was effective only for those that became disabled on or after August 1, 2009 (but before September 1, 2013) as part of the Rehabilitation Plan.

4.02 Demonstration that the proposed suspension is reasonably estimated to enable the plan to avoid insolvency.

(1) Deterministic Illustrations

Exhibit 4 is the Plan actuary's *Report of Required Actuarial Information – Application for Proposed Benefit Suspension as of May 1, 2020.* This certification (dated March 29, 2019) includes a demonstration pursuant to Code §432(e)(9)(D)(iv) that the proposed suspension is reasonably estimated to enable the Plan to avoid insolvency. The Plan is not a plan which, pursuant to Code §432(e)(9)(B)(v)(I), must use stochastic projections in its illustrations demonstrating that it will avoid insolvency.

The *Report* contains a year-by-year projection demonstrating that the Plan is projected to avoid insolvency within the meaning of Code §418E for the extended period with the proposed suspensions going into effect on May 1, 2020. It also contains illustrations as to the Plan's solvency ratio and available resources for each year of the extended period.

(2) Illustration that the proposed suspension is reasonably estimated to achieve the level necessary to avoid insolvency for the extended period utilizing stochastic projections.

The Plan is not required to appoint a retiree representative under Code §432(e)(9)(B)(v)(I). The application therefore does not include an illustration using stochastic projections.

(3) Information on the actuarial assumptions used for the illustrations.

See, **Exhibit 4**.

4.03 Demonstration that the proposed suspension is reasonably estimated to not materially exceed the level necessary to avoid insolvency

Exhibit 4 is the Plan actuary's *Report of Required Actuarial Information – Application for Proposed Benefit Suspension as of May 1, 2020.* This certification (dated March 29, 2019) includes a demonstration pursuant to Code §432(e)(9)(D)(iv) that the proposed benefit suspension is reasonably estimated to not materially exceed the level necessary to avoid insolvency. The *Report* summarizes this demonstration under the heading "Limitation on Aggregate Size of Suspension". The Plan's actuary certifies that the Plan would fail deterministic tests relating to the solvency ratio and/or the projected funded ratio at the end of the extended period if the dollar amount of the proposed benefit suspension for each participant and beneficiary were reduced (but not below zero) by the greater of 5% of the individual's monthly amount proposed to be suspended and 2% of the individual's monthly amount without regard to the proposed suspension.

Part E of the *Report* is captioned *Deterministic Projection Demonstrating Proposed Suspension Does Not Materially Exceed the Level That is Necessary to Avoid Insolvency.* Part E demonstrates that if the suspension is reduced by the amounts described in the preceding paragraph the suspension will no longer be sufficient to enable the Plan to satisfy the requirement to avoid insolvency under §1.432(e)(9)-1(d)(5)(i)(A) of the Regulations. Part E includes calculations, on a year-by-year basis for the relevant period, of available resources, solvency ratio, the market value of assets, contributions, investment earnings, plan benefit payments, and expenses.

4.04 Demonstration that the proposed benefit suspension is distributed equitably.

The proposed benefit suspension provides for different treatment of participants and beneficiaries and is distributed in an equitable manner across the Plan's participant and beneficiary population as required pursuant to Code §432(e)(9)(D)(vi).

See, **Exhibit 7** for the actuary's calculations that demonstrate the equitable distribution of the proposed suspension and for information on the effect of the suspension on the Plan's participants in the aggregate as required per Section 4.04(1)(a) and (b) of Revenue Procedure 2017-43. In addition, the information includes the effect on the suspension for the four groups of participants shown in application Section 2.02, above.

In deciding whether the proposed reduction is equitably distributed the Board of Trustees took into account the following factors listed in § 432(e)(9)(D)(vi):

(III) The amount of benefits. In general, participants who retired prior to the adoption of the Rehabilitation Plan have accrued the greatest benefits under the plan due to the higher historical accrual rates, as well as the subsidized early retirement and optional form of benefit subsidies.

(V) The extent to which a participant or beneficiary is receiving a subsidized benefit. As noted above, participants who retired prior to the adoption of the Rehabilitation Plan had early retirement and optional form of benefit subsidies available to them.

(VII) The Plan's history of benefit increases or reductions. There was a series of Plan accrual rate increases from the inception of the Plan until May 1, 1994, at which time that benefit accrual rate remained in place until May 1, 2003. At that point, the Plan's accrual rate was reduced from 3.65% to 2.2%. Several years later, the Plan's accrual rate was reduced by over 80%, from 2.2% to 0.36%, effective May 1, 2006. Finally, future benefit accruals were suspended indefinitely effective August 1, 2013.

(IX) Any discrepancies between active and retiree benefits. *See,* discussion above regarding the impact of the Rehabilitation Plan and the decreases in the accrual rate after April 30, 2003.

(X) The extent to which active participants are reasonably likely to withdraw support for the plan, accelerating employer withdrawals from the plan and increasing the risk of additional benefit reductions for participants in and out of pay status. Active members since 2003 have experienced multiple reductions in the accrual rate while the contribution rate paid by their employers has increased. Effective August 1, 2013, benefit accruals were suspended indefinitely. While necessary as part of the effort to forestall insolvency these developments could have a chilling effect in the active participants' support for the plan which raises the specter of accelerating employer withdrawals. It is therefore prudent to take steps to ameliorate the impact of the proposed suspension on the active participants to the extent possible, and the suspension design reflects this goal.

In general, the proposed suspension is structured such that Active Participants potentially experience a smaller benefit reduction than Non-Active Participants in order to mitigate the risk of losing support for the plan and accelerating employer withdrawals.

4.05 Notice.

The Trustees have satisfied the notice requirements of Code §432(e)(9)(F) as follows:

(1) Individual notices.

Appendix A to the application contains each type of notice that will be given to each participant and beneficiary under the Plan, as well as to each employer that has an obligation to contribute to Plan and to each employee organization representing participants in the Plan.

(2) Efforts made to contact participants, beneficiaries and alternate payees.

The Board of Trustees for the Pension Fund has complete and up to date records of the Plan's participants and beneficiaries. If an address were found to be invalid the matter would be referred to the Plan's third party administrator (Benesys, Inc.) which would refer the matter to PBI, the entity used by Benesys to monitor participant death records and locate missing participants. Benesys also conducts searches using on-line search tools.

(3) Notices will not be delivered electronically.

(4) Lists of:

(a) Each employer that has an obligation to contribute to the Plan within the meaning of section 4212(a) of ERISA.

A list of the contributing employers that have an obligation to contribute to the Plan within the meaning of § 4212(a) of ERISA is attached as **Exhibit 8**.

(b) Employee organization representing participants under the plan.

The employee organization representing participants under the Plan is the International Association of Sheet Metal, Air, Rail and Transportation Workers Local Union No. 33.

SECTION 5. PLAN SPONSOR DETERMINATION RELATING TO REASONABLE MEASURES TAKEN TO AVOID INSOLVENCY

5.01 Measures taken to avoid insolvency.

See, discussion in Section 3.03, above, and the Narrative Statement (**Exhibit 10**).

5.02 Plan factors.

See, discussion in Section 3.03, above, and the Narrative Statement (**Exhibit 10**).

5.03 How plan factors were taken into account.

See, discussion in Section 3.03, above, and the Narrative Statement (**Exhibit 10**).

5.04 Other factors considered.

See, discussion in Section 3.03, above, and the Narrative Statement (**Exhibit 10**).

SECTION 6. OTHER REQUIRED INFORMATION

6.01 Ballot.

See, **Appendix A** for a proposed ballot package intended to satisfy the requirements of Code §432(e)(9)(H)(iii). In keeping with the Revenue Procedure, the ballot package does not include the information described in Regulation §1.432(e)(9)-1(h)(3)(i)(E), (L) or (M)(the statement in opposition to the proposed benefit suspension, the individual estimate that will be provided as part of the notice, and the voting procedures, including the deadline for voting).

6.02 Partition.

The Plan is not requesting approval for a partition.

6.03 Description of assumptions used in projections.

The application is supplemented with attachments intended to fulfill the requirements of Section 6.03 of the Revenue Procedure and its Appendix B. **Exhibit 4** is the Plan actuary's *Report of Required Actuarial Information – Application for Proposed Benefit Suspension as of May 1, 2020.* The information required under this section is found in Part K of that report.

6.04 Ten-year experience for certain critical assumptions.

See, **Exhibit 4** which is the Plan actuary's *Report of Required Actuarial Information – Application for Proposed Benefit Suspension as of May 1, 2020.* This certification (dated March 29, 2019) includes, under the heading *Part K 2 – Supporting Documentation For Selection of Certain Actuarial Assumptions*, a subsection under the heading *Contribution Base Units and Employer Withdrawals*. This section presents a table showing the 10-year experience for certain critical assumptions including the total employer contributions, pension hours, average hourly contribution rate, withdrawal liability payments, and the market value return on assets for the last 10 plan years. This section fulfills the requirements of Section 6.04 of the Revenue Procedure.

6.05 Demonstration of sensitivity projections.

See, **Exhibit 4** which is the Plan actuary's *Report of Required Actuarial Information – Application for Proposed Benefit Suspension as of May 1, 2020.* This certification (dated March 29, 2019) includes

- Part F. Deterministic projection of proposed suspension assuming annual rate of return is reduced by 1.00%

- Part G. Deterministic projection of proposed suspension assuming annual rate of return is reduced by 2.00%

- Part H. Deterministic projection of proposed suspension assuming the industry activity assumption continues under the same trend as the Plan experienced over the last 10 years (1.1% per year)

- Part I. Deterministic projection of the proposed suspension assuming the industry activity assumption continues under the same trend as the Plan experienced over the last 10 years, reduced by 1.00% (0.1% per year)

This exhibit satisfies the requirements of Section 6.05 of the Revenue Procedure.

6.06 Projection of funded percentage.

See, **Exhibit 4** which is the Plan actuary's *Report of Required Actuarial Information – Application for Proposed Benefit Suspension as of May 1, 2020.* This certification (dated March

29, 2019) includes Part J which projects the Plan's market value of assets, unit credit accrued liability, and funded percentage for each year of the extended period.

This exhibit satisfies the requirements of Section 6.06 of the Revenue Procedure.

6.07 Plan sponsor certifications relating to plan amendments.

See, **Exhibit 9** for the Trustees' certification that if they receive final authorization to implement the suspension of benefits as described in Code §432(e)(9)(H)(vi), and choose to implement the authorized suspensions then they will adopt in a timely manner the following plan amendments which shall not be modified at any time thereafter before the suspension of benefits expires:

(1) in accordance with Code §432(e)(9)(C)(ii) a plan amendment providing that the benefit suspension will cease as of the first day of the first Plan Year following the Plan Year in which the Trustees fail to determine that both: (a) all reasonable measures to avoid insolvency continue to be taken during the period of benefit suspension; and (b) the Plan is projected to become insolvent unless benefits continue to be suspended; and

(2) a plan amendment providing that any future benefit improvements must satisfy the requirements of Code §432(e)(9)(E).

6.08 Whether the plan is a plan described in §432(e)(9)(D)(vii).

The Plan is not a plan described in Code §432(e)(9)(D)(vii).

6.09 Narrative statement.

See, **Exhibit 10**.

SECTION 7. IDENTIFICATION AND BACKGROUND INFORMATION ON THE PLAN

7.01 Plan sponsor.

The Plan Sponsor is the Board of Trustees of the Sheet Metal Workers Local Pension Plan. The address of the Board is P.O. Box 368, Troy, MI 48099-0368. The Telephone number is (248) 641-4902. The Board does not have a separate Employment Identification Number (EIN).

7.02 Plan identification.

The name of the Plan is the Sheet Metal Workers Local Pension Plan. The Plan has been assigned Plan Number 001. Its Employment Identification Number (EIN) is 34-6666753. The Plan is a multiemployer plan within the meaning of Code §414(f) and ERISA §3(37).

7.03 Retiree representative.

The Plan is not required to appoint a Retiree Representative under the Regulations because it is not a plan with 10,000 or more participants.

7.04 Plan's enrolled actuary.

The Plan's enrolled actuary is Kevin M. Campe, EA, MAAA (EA #17-05356) of Milliman, Inc., located at 71 South Wacker Drive, 31st Floor, Chicago, IL 60606. The telephone number is (312) 726-0677.

7.05 Power of attorney.

See, **Appendix C**. The Plan's representatives as attorney-in-fact are Paul M. Newcomer and Michael A. Novara of Novara, Tesija & Catenacci, PLLC.

7.06 Plan documents.

See, **Exhibit 11** for the Plan's most recently restated Plan Document, including all amendments, the most recent summary plan description as defined under §102 of ERISA and any subsequent summaries of material modifications, and the Plan's most recent determination letter.

7.07 Collective bargaining and side agreements.

See, **Exhibit 12**, for excerpts from the collective bargaining agreements and side agreements pursuant to which the Plan is maintained, including language from any portions of a collective bargaining agreement or side agreement that are relevant to the Plan or proposed suspension.

7.08 Annual return.

See, **Exhibit 13** for the following sections of the Plan's most recently filed form 5500: (1) pages 1 and 2 of Form 5500, (2) Schedule MB, including attachments, (3) Schedule R, with attachments, and (4) accountant's report under section 103(a)(3) of ERISA.

7.09 Rehabilitation plan.

See, **Exhibit 14**, for a copy of the Plan's most recently updated Rehabilitation Plan.

7.10 Valuation reports.

See, **Exhibit 15** for the May 1, 2016 actuarial valuation report for the Plan. The May 1, 2017 actuarial valuation is provided as **Exhibit 16**.

7.11 Completed checklist.

See, **Appendix D** for the completed checklist of information required to be included in the Plan's application.

The Trustees appreciate Treasury's review of this important matter for the Plan. Should you have any questions or require any additional information please contact Paul M. Newcomer or Michael A. Novara at T: (248) 354-0380.

SHEET METAL WORKERS LOCAL PENSION FUND

[redacted]

Tom Wiant, Chairman

Signed: March 25, 2019

SHEET METAL WORKERS LOCAL PENSION FUND

APPLICATION ON RESUBMISSION FOR APPROVAL OF SUSPENSION OF BENEFITS UNDER THE MULTIEMPLOYER PENSION REFORM ACT OF 2014

EXHIBITS AND APPENDICES

NOTICE OF RESUBMISSION APPLICATION BY THE SHEET METAL WORKERS LOCAL PENSION FUND FOR APPROVAL OF A PROPOSED REDUCTION OF BENEFITS

NOTICE OF A REVISED PROPOSED REDUCTION OF YOUR LOCAL PENSION FUND BENEFITS

On March 31, 2018, the Board of Trustees of the Sheet Metal Workers Local Pension Fund ("the Fund") submitted an application to the U.S. Treasury Department for approval to reduce benefits under the Pension Fund's pension plan. All of the Fund's participants, beneficiaries and contributing employers received written notice of the application, and participants and beneficiaries received a notice that described specifically what the impact of the proposed reduction would be, individually. On October 2, 2018, the Fund advised the Treasury that it was withdrawing the application, but would resubmit a revised application at a future date.

On March 31, 2019, the Fund submitted a revised application, again asking the Treasury to approve a proposed reduction in benefits under the Fund's pension plan. This type of benefit reduction is allowed by Federal law under the Multiemployer Pension Reform Act of 2014 (MPRA). You are getting this notice because you are a Plan participant and/or have a pension benefit under the Plan. **The end of this notice describes the proposed reduction (if any) of YOUR monthly payments.**[1]

This notice will also answer the following questions for you:

- Why is the Board of Trustees proposing to reduce benefits?
- What will happen if the Fund runs out of money?
- How did the Board of Trustees decide to reduce benefits and by how much?
- What are the proposed reductions in benefits?
- What comes next?

Why is the Board of Trustees proposing to reduce benefits?

The Fund's actuary estimates that, unless benefits are reduced, the Fund will not have enough money to pay benefits in the plan year beginning May 1, 2033. This estimate is based on how much money the actuary expects the Fund to receive and pay out each year. The Fund's actuary has estimated that, with the reduction of benefits that the Board of Trustees has proposed, the Fund should not run out of money.

[1] A version of this notice that does not include the estimate of the effect on your benefit is being sent to the Local Union that represents Plan participants and to all of the employers who make contributions to the Plan.

What will happen if the Fund runs out of money?

If the Fund does not have enough money to pay benefits, then only the amount guaranteed by the Pension Benefit Guaranty Corporation ("PBGC") will be paid. **You can find the amount of YOUR benefit that is guaranteed by PBGC, at the end of this notice**.

How did the Board of Trustees decide which benefits to reduce and by how much?

Under Federal law, the Board of Trustees must apply the following rules to the proposed reduction:

- ➢ The total reduction in everybody's benefits must be estimated to be large enough to keep the Fund from running out of money but not larger than what is needed to do that;
- ➢ Your monthly benefit and the benefit of your beneficiary cannot be reduced below 110% of the amount guaranteed by PBGC (defined as the MPRA guaranteed amount);
- ➢ The law does not permit any reduction in benefits based on disability. **The Fund as amended does not currently provide for disability retirement**, but those participants who obtained a disability retirement when the Fund still allowed it cannot have their benefit reduced;
- ➢ The benefits of people who are at least 80 years old on May 31, 2020 and their beneficiaries cannot have their benefit reduced;
- ➢ The benefits of people who are at least 75 years old on May 31, 2020 and their beneficiaries, are partially protected and the closer the person is to age 80 the less the benefits can be reduced; and
- ➢ The reduction of benefits must be spread fairly among the people who have a pension benefit under the Fund.

In deciding whether the proposed reduction is spread fairly, the Board of Trustees took into account the following:

- ➢ The amount of benefits;
- ➢ The extent to which a participant or beneficiary is receiving a subsidized benefit;
- ➢ The Fund's history of benefit increases or reductions;
- ➢ Any differences between the benefits accrued by active and retired participants;

- Accelerating employer withdrawals from the plan and increasing the risk of additional benefit reductions; and
- The extent to which active participants are reasonably likely to withdraw support for the plan.

What are the proposed reductions in benefits?

After considering the above factors, the Trustees ultimately decided to divide the Fund population into four groups, and to reduce the benefits of the participants and beneficiaries within those groups effective May 1, 2020, as follows:

		Proposed
Non-Active Participants	**Retirement Date[2]**	**Reduction**
Group 1	Before August 1, 2009[3] and all Terminated Vested Participants	35%
Group 2	On or after August 1, 2009	30%
Active Participants	**Hire Date**	
Group 3	Before May 1, 2006[4]	25%
Group 4	On or after May 1, 2006	No reduction

Active Participants are Plan Participants who worked at least 435 hours in covered service during the plan year ended April 30, 2017 or April 30, 2018 and who have not retired as of April 30, 2018. Non-Active Participants include Terminated Vested Participants, Retired Participants, Disabled Participants, Beneficiaries of Participants, and Alternate Payees.

Your Group for purposes of the proposed reduction of benefits is determined as of April 30, 2018. For example if you are an Active Participant who separated from covered employment after April 30, 2018, you will remain in Group 3 or Group 4 depending on your hire date. Similarly, if you are a Terminated Vested Participant who commences after April 30, 2018, you will remain in Group 1.

To estimate the effect of the proposed reduction, first multiply the applicable reduction percentage and the pre-reduction benefit. The resulting the amount is then subtracted from the pre-reduction benefit to determine the post-reduction benefit. As noted, the

[2] Member's Retirement Date for Beneficiaries of Retired Participants and for Alternate Payees of shared-payment QDROs.
[3] Effective date of the Plan's Rehabilitation Plan.
[4] Effective date of the Plan's amendment reducing the rate of accrual from 2.2% to 0.36% of contributions.

amount of the reduction could be impacted by the federal limitations on the amount of individual reductions.

The following are example calculations for Groups 1, 2 and 3. There is no example for Group 4 as there is no proposed reduction for that group.

Group 1 Example: A retiree who retired before August 1, 2009 currently receiving a monthly benefit of $2,000. The retiree will be age 78 as of May 31, 2020.

(a) Pre-reduction benefit	$2,000
(b) Reduction percentage	35%
(c) Reduction amount, before adjustment = (a) x (b)	$700
(d) Reduction amount, after age 75-79 adjustment	$280
(e) Post-reduction benefit = (a) – (d)	$1,720

Group 2 Example: A retiree who retired after July 31, 2009, currently receiving a monthly benefit of $1,000. The retiree will be *under* age 75 as of May 31, 2020.

(a) Pre-reduction benefit	1,500
(b) Reduction percentage	30%
(c) Reduction amount, before adjustment = (a) x (b)	$450
(d) Post-reduction benefit = (a) – (c)	$1,050

Group 3 Example: An active participant hired before May 1, 2006 with a monthly accrued benefit of $500.

(a) Pre-reduction benefit	$500
(b) Reduction percentage	25%
(c) Reduction amount, before adjustment = (a) x (b)	$125
(d) Post-reduction benefit = (a) – (c)	$375

The above examples are for illustrative purposes only and do not reflect all potential scenarios (for example, different limitations on the amount the benefit may be reduced could affect your reduction depending on which factors apply to you).

Attached to the end of this notice is a statement that describes the impact of proposed reduction of YOUR monthly payments

The proposed reduction will remain in effect indefinitely. The benefit reduction is expected to stabilize the Fund and keep it solvent. This expectation is based on a number of assumptions – such as projected future work hours, contribution rates, and investment returns. Even with these and other assumptions carefully considered, it is possible that the reduction may not work as intended.

What comes next?

Approval or denial of the application by the Treasury Department.

The Treasury Department will review the application to see whether it meets all of the legal requirements under Federal law. If the application meets all of the legal requirements, the Treasury Department is required to approve the application. If the application does not meet the legal requirements, the Treasury Department will deny the application. The Treasury Department will have until November 11, 2019, to make a decision.

You can get more information from the Treasury Department.

More information about the proposed benefit reductions and a copy of the application will be available at www.treasury.gov/mpra, within thirty (30) days after the Treasury Department receives it. The application includes more information about the proposed reduction, including details regarding:

- the Fund actuary's certification that the Fund will run out of money (that is, that the Fund is in a "critical and declining status");
- how the proposed reduction would satisfy the requirement that it be large enough so that the Fund is estimated to not run out of money, while not being larger than needed; and
- the sensitivity of these estimates to the assumptions used.

The application describes the steps the Board of Trustees has already taken to keep the Fund from running out of money and why the Board of Trustees believes that a benefit reduction is the only remaining option to keep the Fund from running out of money. In addition, the application explains why the Board of Trustees believes that the proposed reduction is spread fairly among those people who have a pension benefit under the Fund.

The Treasury Department website will also provide updated information on the application, such as whether the application has been withdrawn.

For further information and assistance, you can also write to the Treasury Department at the following address:

Department of the Treasury
Attn: MPRA Office, Room 1204
1500 Pennsylvania Avenue, NW
Washington, DC 20220

You can comment on the application to reduce benefits.

You will be able to submit a comment on the application by going to www.treasury.gov/mpra. Comments may also be mailed to the Treasury Department, at the address listed above. All interested parties can make comments, and the comments will be publicly available.

Retiree Representative.

The Board of Trustees is not required to select a retiree representative, because the Fund has fewer than 10,000 participants. The Board of Trustees has not chosen to select a retiree representative.

Vote on the proposed benefit reduction.

If the application for the proposed reduction of benefits is approved by the Treasury Department, you will then have the opportunity to vote on the proposed reduction. Unless a majority of all participants and beneficiaries of the Fund vote to reject the reduction, the Treasury Department must allow the reduction of benefits to take effect. This means that not voting counts the same as voting to approve the reduction.

Your right to see plan documents of the Fund.

You may want to review the plan documents of the Pension Fund to help you understand your rights and the proposed reduction to your benefits. The Fund Administrator must respond to your request for the following documents, within thirty (30) days:

- The plan document of the Pension Fund (including any amendments adopted to reflect an authorized reduction of benefits), trust agreement, and other documents governing the Fund (such as collective bargaining agreements);

- The Fund's most recent Summary Plan Description (SPD or plan brochure) and any Summary of Material Modifications (SMM);

- The Fund's Form 5500 annual reports, including the accountant's report and audited financial statements, filed with the U.S. Department of Labor during the last six years;

- The annual funding notices furnished by the Fund during the last six years;

- Actuarial reports, including reports prepared in anticipation of the benefit reduction, furnished to the Fund within the last six years;

- The Fund's current rehabilitation plan, including contribution schedules, and, if the proposed benefit reduction goes into effect, annual plan-sponsor determinations that all reasonable measures to avoid running out of money continue to be taken and that the Fund ***would*** run out of money ***if*** there were no benefit reductions; and

- Any quarterly, semi-annual, or annual financial reports prepared for the Fund by an investment manager, fiduciary, or other advisor and furnished to the Fund within the last six years.

The Fund administrator may charge you the cost per page to the Fund for the cheapest way of copying documents, but cannot charge more than 25 cents per page. The Fund's Form 5500 Annual Return/Report of Employee Benefit Plan is also available free of charge at www.dol.gov/ebsa/5500main.html. Some of the documents may also be available for examination, without charge, at the Fund administrator's office, your worksite, or union hall.

Your right to challenge incorrect calculations.

If you think the Fund miscalculated the reduction to your benefits, you have the right to submit a claim to the Fund to have the calculation corrected. The Fund's Summary Fund Description ("SPD") tells you how to submit a claim. The SPD also describes your right to have a court review the Fund's final decision on your claim. If you believe the information used to calculate your estimate at the end of this notice is incorrect, please contact the Fund office at:

Sheet Metal Workers Local Pension Fund
c/o BeneSys, Inc.
Attn: Mary Weir, Plan Administrator
PO Box 368
Troy, MI 48099-0368
(248) 641-4902
pensionannuitydept@benesysinc.com

Template 1 – Not impacted participants and beneficiaries (excluding QDROs)

HOW YOUR MONTHLY PAYMENTS WILL BE AFFECTED

This estimate of the effect of the proposed reduction of benefits has been prepared for: <REDACTED>

Your monthly benefit would not change under the proposed reduction.

Your monthly benefit will not be reduced because you meet one or more of the following:

- [X] Your monthly benefit is less than the MPRA guaranteed amount
- [ ] Your entire monthly benefit is based on disability
- [ ] You will be 80 years of age or older as of May 31, 2020
- [ ] You are in Group 4 (Active Participant who was hired on or after May 1, 2006)

This is an estimate of the effect of the proposed reduction on your benefit under the Plan. It is not a final benefit calculation. This estimate was prepared assuming that the proposed benefit reduction starts on May 1, 2020.

This estimate is based on the following information from Plan records:

- You have earned 14.50 years of service under the Plan through July 31, 2013.
- You will be 68 years and 3 months as of May 31, 2020.
- The portion of your benefit that is based on disability is $0.00.

PBGC Guaranteed Benefits

If the Plan does not have enough money to pay benefits, your monthly benefit would be no larger than the amount guaranteed by PBGC. The amount of your monthly benefit guaranteed by PBGC is estimated to be $81.52. However, there is concern about the health of the PBGC. If the PBGC becomes insolvent, your benefit could be significantly less.

Template 2 –Impacted Group 1 in pay (excluding QDROs)

HOW YOUR MONTHLY PAYMENTS WILL BE AFFECTED

This estimate of the effect of the proposed reduction of benefits has been prepared for:
<REDACTED>

Your current monthly benefit is $110.35. Under the proposed reduction your monthly benefit will be reduced to $109.19 beginning on May 1, 2020.

Plan records indicate that you are in Group 1[1] and therefore subject to a 35% reduction in your current benefit. However, your final monthly benefit may be reduced by less than 35% due to federal limitations on individual reductions for the following reasons:

- [X] The MPRA guaranteed amount limits the amount of reduction
- [ ] You will be between the ages of 75 and 79 as of May 31, 2020
- [ ] A portion of your monthly benefit is based on disability

The proposed reduction is permanent.

This is an estimate of the effect of the proposed reduction on your benefit under the Plan. It is not a final benefit calculation. This estimate was prepared assuming that the proposed benefit reduction starts on May 1, 2020. If the benefit reduction starts later, the effect of the proposed reduction on your benefit might be different.

This estimate is based on the following information from Plan records:

- You have earned 6.00 years of service under the Plan through July 31, 2013.
- You will be 50 years and 4 months as of May 31, 2020.
- The portion of your benefit that is based on disability is $0.00.

PBGC Guaranteed Benefits

If the Plan does not have enough money to pay benefits, your monthly benefit would be no larger than the amount guaranteed by PBGC. The amount of your monthly benefit guaranteed by PBGC is estimated to be $99.26. However, there is concern about the health of the PBGC. If the PBGC becomes insolvent, your benefit could be significantly less.

[1] See description of the proposed reductions of benefits in the General Notice that you have received for an explanation of the categories of participants.

Template 3 –Impacted Group 1 not in pay under normal retirement age (excluding QDROs)

HOW YOUR MONTHLY PAYMENTS WILL BE AFFECTED

This estimate of the effect of the proposed reduction of benefits has been prepared for:
<REDACTED>

If you start receiving your benefit on 2/1/2045 in the form of a life annuity, your monthly benefit without the proposed reduction would be $191.89. Under the proposed reduction your monthly benefit in the same form would be reduced to $188.56[1].

Plan records indicate that you are in Group 1[2] and therefore subject to a 35% reduction in your monthly benefit. However, your final monthly benefit may be reduced by less than 35% due to federal limitations on individual reductions for the following reasons:

[X] The MPRA guaranteed amount limits the amount of reduction

[ ] You will be between the ages of 75 and 79 as of May 31, 2020

[ ] A portion of your monthly benefit is based on disability

The proposed reduction is permanent.

This is an estimate of the effect of the proposed reduction on your benefit under the Plan. It is not a final benefit calculation. This estimate was prepared assuming that the proposed benefit reduction starts on May 1, 2020. If the benefit reduction starts later, the effect of the proposed reduction on your benefit might be different.

This estimate is based on the following information from Plan records:

- You have earned 10.00 years of service under the Plan through July 31, 2013.
- You will be 36 years and 4 months as of May 31, 2020.
- The portion of your benefit that is based on disability is $0.00.

PBGC Guaranteed Benefits

If the Plan does not have enough money to pay benefits, your monthly benefit would be no larger than the amount guaranteed by PBGC. The amount of your monthly benefit guaranteed by PBGC is estimated to be $171.42. However, there is concern about the health of the PBGC. If the PBGC becomes insolvent, your benefit could be significantly less.

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[1] These numbers are just estimates. The actual amount you receive will depend on things like how long you work and when you begin receiving payments. For more information, see the Summary Plan Description available at www.ourbenefitoffice.com/SheetMetalWorkers33.

[2] See description of the proposed reductions of benefits in the General Notice that you have also received for an explanation of the categories of participants.

HOW YOUR MONTHLY PAYMENTS WILL BE AFFECTED

This estimate of the effect of the proposed reduction of benefits has been prepared for:
<REDACTED>

Your benefit without the proposed reduction as of March, 2019 in the form of a life annuity is \$397.22. Under the proposed reduction your monthly benefit in the same form would be reduced to \$258.19[1].

Plan records indicate that you are in Group 1[2] and therefore subject to a 35% reduction in your monthly benefit. However, your final monthly benefit may be reduced by less than 35% due to federal limitations on individual reductions for the following reasons:

- ☐ The MPRA guaranteed amount limits the amount of reduction
- ☐ You will be between the ages of 75 and 79 as of May 31, 2020
- ☐ A portion of your monthly benefit is based on disability

The proposed reduction is permanent.

This is an estimate of the effect of the proposed reduction on your benefit under the Plan. It is not a final benefit calculation. This estimate was prepared assuming that the proposed benefit reduction starts on May 1, 2020. If the benefit reduction starts later, the effect of the proposed reduction on your benefit might be different.

This estimate is based on the following information from Plan records:

- You have earned 12.00 years of service under the Plan through July 31, 2013.
- You will be 69 years and 8 months as of May 31, 2020.
- The portion of your benefit that is based on disability is \$0.00.

PBGC Guaranteed Benefits

If the Plan does not have enough money to pay benefits, your monthly benefit would be no larger than the amount guaranteed by PBGC. The amount of your monthly benefit guaranteed by PBGC is estimated to be \$207.22. However, there is concern about the health of the PBGC. If the PBGC becomes insolvent, your benefit could be significantly less.

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[1] These amounts will be different if you take your benefit in a different form. For example, if you elect a five-year certain and life annuity, your reduced monthly benefit will be \$248.87.

[2] See description of the proposed reductions of benefits in the General Notice that you have also received for an explanation of the categories of participants.

Template 5 –Impacted Group 2 in pay (excluding QDROs)

HOW YOUR MONTHLY PAYMENTS WILL BE AFFECTED

This estimate of the effect of the proposed reduction of benefits has been prepared for:

<REDACTED>

Your current monthly benefit is $423.28. Under the proposed reduction your monthly benefit will be reduced to $379.46 beginning on May 1, 2020.

Plan records indicate that you are in Group 2[1] and therefore subject to a 30% reduction in your current benefit. However, your final monthly benefit may be reduced by less than 30% due to federal limitations on individual reductions for the following reasons:

- [X] The MPRA guaranteed amount limits the amount of reduction
- [ ] You will be between the ages of 75 and 79 as of May 31, 2020
- [ ] A portion of your monthly benefit is based on disability

The proposed reduction is permanent.

This is an estimate of the effect of the proposed reduction on your benefit under the Plan. It is not a final benefit calculation. This estimate was prepared assuming that the proposed benefit reduction starts on May 1, 2020. If the benefit reduction starts later, the effect of the proposed reduction on your benefit might be different.

This estimate is based on the following information from Plan records:

- You have earned 10.00 years of service under the Plan through July 31, 2013.
- You will be 70 years and 7 months as of May 31, 2020.
- The portion of your benefit that is based on disability is $0.00.

PBGC Guaranteed Benefits

If the Plan does not have enough money to pay benefits, your monthly benefit would be no larger than the amount guaranteed by PBGC. The amount of your monthly benefit guaranteed by PBGC is estimated to be $344.96. However, there is concern about the health of the PBGC. If the PBGC becomes insolvent, your benefit could be significantly less.

[1] See description of the proposed reductions of benefits in the General Notice that you have also received for an explanation of the categories of participants.

Template 6 –Impacted Group 3 not in pay under normal retirement age (excluding QDROs)

HOW YOUR MONTHLY PAYMENTS WILL BE AFFECTED

This estimate of the effect of the proposed reduction of benefits has been prepared for:

<REDACTED>

If you start receiving your benefit on 9/1/2028 in the form of a life annuity, your monthly benefit without the proposed reduction would be $306.73. Under the proposed reduction your monthly benefit in the same form would be reduced to $287.09[1].

Plan records indicate that you are in Group 3[2] and therefore subject to a 25% reduction in your monthly benefit. However, your final monthly benefit may be reduced by less than 25% due to federal limitations on individual reductions for the following reasons:

- [X] The MPRA guaranteed amount limits the amount of reduction
- [ ] You will be between the ages of 75 and 79 as of May 31, 2020
- [ ] A portion of your monthly benefit is based on disability

The proposed reduction is permanent.

This is an estimate of the effect of the proposed reduction on your benefit under the Plan. It is not a final benefit calculation. This estimate was prepared assuming that the proposed benefit reduction starts on May 1, 2020. If the benefit reduction starts later, the effect of the proposed reduction on your benefit might be different.

This estimate is based on the following information from Plan records:

- You have earned 11.25 years of service under the Plan through July 31, 2013.
- You will be 52 years and 9 months as of May 31, 2020.
- The portion of your benefit that is based on disability is $0.00.

PBGC Guaranteed Benefits

If the Plan does not have enough money to pay benefits, your monthly benefit would be no larger than the amount guaranteed by PBGC. The amount of your monthly benefit guaranteed by PBGC is estimated to be $260.99. However, there is concern about the health of the PBGC. If the PBGC becomes insolvent, your benefit could be significantly less.

[1] These numbers are just estimates. The actual amount you receive will depend on things like how long you work and when you begin receiving payments. For more information, see the Summary Plan Description available at www.ourbenefitoffice.com/SheetMetalWorkers33.

[2] See description of the proposed reductions of benefits in the General Notice that you have also received for an explanation of the categories of participants.

Template 7 –Impacted Group 3 not in pay over normal retirement age (excluding QDROs)

HOW YOUR MONTHLY PAYMENTS WILL BE AFFECTED

This estimate of the effect of the proposed reduction of benefits has been prepared for:

<REDACTED>

Your benefit without the proposed reduction as of March, 2019 in the form of a life annuity is $851.02. Under the proposed reduction your monthly benefit in the same form would be reduced to $638.26[1].

Plan records indicate that you are in Group 3[2] and therefore subject to a 25% reduction in your monthly benefit. However, your final monthly benefit may be reduced by less than 25% due to federal limitations on individual reductions for the following reasons:

☐ The MPRA guaranteed amount limits the amount of reduction

☐ You will be between the ages of 75 and 79 as of May 31, 2020

☐ A portion of your monthly benefit is based on disability

The proposed reduction is permanent.

This is an estimate of the effect of the proposed reduction on your benefit under the Plan. It is not a final benefit calculation. This estimate was prepared assuming that the proposed benefit reduction starts on May 1, 2020. If the benefit reduction starts later, the effect of the proposed reduction on your benefit might be different.

This estimate is based on the following information from Plan records:

- You have earned 14.25 years of service under the Plan through July 31, 2013.
- You will be 62 years and 4 months as of May 31, 2020.
- The portion of your benefit that is based on disability is $0.00.

PBGC Guaranteed Benefits

If the Plan does not have enough money to pay benefits, your monthly benefit would be no larger than the amount guaranteed by PBGC. The amount of your monthly benefit guaranteed by PBGC is estimated to be $509.44. However, there is concern about the health of the PBGC. If the PBGC becomes insolvent, your benefit could be significantly less.

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[1] These amounts will be different if you take your benefit in a different form. For example, if you elect a five-year certain and life annuity, your reduced monthly benefit will be $627.67.

[2] See description of the proposed reductions of benefits in the General Notice that you have also received for an explanation of the categories of participants.

HOW YOUR MONTHLY PAYMENTS WILL BE AFFECTED

This estimate of the effect of the proposed reduction of benefits has been prepared for:

<REDACTED>

Your current monthly benefit is $902.64. Under the proposed reduction your monthly benefit will be reduced to $676.98 beginning on May 1, 2020.

Plan records indicate that you are in Group 3[1] and therefore subject to a 25% reduction in your current benefit. However, your final monthly benefit may be reduced by less than 25% due to federal limitations on individual reductions for the following reasons:

☐ The MPRA guaranteed amount limits the amount of reduction

☐ You will be between the ages of 75 and 79 as of May 31, 2020

☐ A portion of your monthly benefit is based on disability

The proposed reduction is permanent.

This is an estimate of the effect of the proposed reduction on your benefit under the Plan. It is not a final benefit calculation. This estimate was prepared assuming that the proposed benefit reduction starts on May 1, 2020. If the benefit reduction starts later, the effect of the proposed reduction on your benefit might be different.

This estimate is based on the following information from Plan records:

- You have earned 13.25 years of service under the Plan through July 31, 2013.
- You will be 61 years and 1 months as of May 31, 2020.
- The portion of your benefit that is based on disability is $0.00.

PBGC Guaranteed Benefits

If the Plan does not have enough money to pay benefits, your monthly benefit would be no larger than the amount guaranteed by PBGC. The amount of your monthly benefit guaranteed by PBGC is estimated to be $473.69. However, there is concern about the health of the PBGC. If the PBGC becomes insolvent, your benefit could be significantly less.

[1] See description of the proposed reductions of benefits in the General Notice that you have also received for an explanation of the categories of participants.

Template 9 – Not impacted members/alternate payees (QDROs)

HOW YOUR MONTHLY PAYMENTS WILL BE AFFECTED*

This estimate of the effect of the proposed reduction of benefits has been prepared for:
<REDACTED>

Your monthly benefit would not change under the proposed reduction.

This is an estimate of the effect of the proposed reduction on your benefit under the Plan. It is not a final benefit calculation. This estimate was prepared assuming that the proposed benefit reduction starts on May 1, 2020.

This estimate is based on the following information from Plan records:

- You have 24.00 years of service* under the Plan through July 31, 2013.
- You will be 88 years and 4 months** as of May 31, 2020.
- The portion of your benefit that is based on disability is $0.00.

PBGC Guaranteed Benefits

If the Plan does not have enough money to pay benefits, your monthly benefit would be no larger than the amount guaranteed by PBGC. The amount of your monthly benefit guaranteed by PBGC is estimated to be $387.00*. However, there is concern about the health of the PBGC. If the PBGC becomes insolvent, your benefit could be significantly less.

*Estimated based on the terms of an applicable Qualified Domestic Relations Order (QDRO).
**Based on the participant's date of birth for shared-payment QDROs.

HOW YOUR MONTHLY PAYMENTS WILL BE AFFECTED*

This estimate of the effect of the proposed reduction of benefits has been prepared for:

<REDACTED>

Your current monthly benefit is $ 987.09. Under the proposed reduction your monthly benefit will be reduced to $ 968.65 beginning on May 1, 2020.

Plan records indicate that you are in Group 1[1] and therefore subject to a 35% reduction in your current benefit. However, your final monthly benefit may be reduced by less than 35% due to federal limitations on individual reductions for the following reasons:

- [X] The MPRA guaranteed amount limits the amount of reduction
- [X] You will be between the ages of 75 and 79 as of May 31, 2020**
- [ ] A portion of your monthly benefit is based on disability

The proposed reduction is permanent.

This is an estimate of the effect of the proposed reduction on your benefit under the Plan. It is not a final benefit calculation. This estimate was prepared assuming that the proposed benefit reduction starts on May 1, 2020. If the benefit reduction starts later, the effect of the proposed reduction on your benefit might be different.

This estimate is based on the following information from Plan records:

- You have 36.00 years of service* under the Plan through July 31, 2013.
- You will be 78 years and 11 months** as of May 31, 2020.
- The portion of your benefit that is based on disability is $0.00.

PBGC Guaranteed Benefits

If the Plan does not have enough money to pay benefits, your monthly benefit would be no larger than the amount guaranteed by PBGC. The amount of your monthly benefit guaranteed by PBGC is estimated to be $819.99*. However, there is concern about the health of the PBGC. If the PBGC becomes insolvent, your benefit could be significantly less.

*Estimated based on the terms of an applicable Qualified Domestic Relations Order (QDRO).
**Based on the participant's date of birth for shared-payment QDROs.

[1] See description of the proposed reductions of benefits in the General Notice that you have received for an explanation of the categories of participants.

Template 11 – Impacted Group 2 in pay (QDROs)

HOW YOUR MONTHLY PAYMENTS WILL BE AFFECTED*

This estimate of the effect of the proposed reduction of benefits has been prepared for:

<REDACTED>

Your current monthly benefit is $740.27. Under the proposed reduction your monthly benefit will be reduced to $616.27 beginning on May 1, 2020.

Plan records indicate that you are in Group 2[1] and therefore subject to a 30% reduction in your current benefit. However, your final monthly benefit may be reduced by less than 30% due to federal limitations on individual reductions for the following reasons:

[X] The MPRA guaranteed amount limits the amount of reduction

[ ] You will be between the ages of 75 and 79 as of May 31, 2020**

[ ] A portion of your monthly benefit is based on disability

The proposed reduction is permanent.

This is an estimate of the effect of the proposed reduction on your benefit under the Plan. It is not a final benefit calculation. This estimate was prepared assuming that the proposed benefit reduction starts on May 1, 2020. If the benefit reduction starts later, the effect of the proposed reduction on your benefit might be different.

This estimate is based on the following information from Plan records:

- You have 27.00 years of service* under the Plan through July 31, 2013.
- You will be 61 years and 5 months** as of May 31, 2020.
- The portion of your benefit that is based on disability is $0.00.

PBGC Guaranteed Benefits

If the Plan does not have enough money to pay benefits, your monthly benefit would be no larger than the amount guaranteed by PBGC. The amount of your monthly benefit guaranteed by PBGC is estimated to be $520.70*. However, there is concern about the health of the PBGC. If the PBGC becomes insolvent, your benefit could be significantly less.

*Estimated based on the terms of an applicable Qualified Domestic Relations Order (QDRO).
**Based on the participant's date of birth for shared-payment QDROs.

[1] See description of the proposed reductions of benefits in the General Notice that you have also received for an explanation of the categories of participants.

Template 12 –Impacted Group 1 not in pay under normal retirement age (QDRO)

HOW YOUR MONTHLY PAYMENTS WILL BE AFFECTED*

This estimate of the effect of the proposed reduction of benefits has been prepared for:

<REDACTED>

If you start receiving your benefit on 10/1/2022 in the form of a life annuity, your monthly benefit without the proposed reduction would be $1185.54. Under the proposed reduction your monthly benefit in the same form would be reduced to $770.6[1].

Plan records indicate that you are in Group 1[2] and therefore subject to a 35% reduction in your monthly benefit. However, your final monthly benefit may be reduced by less than 35% due to federal limitations on individual reductions for the following reasons:

- [ ] The MPRA guaranteed amount limits the amount of reduction
- [ ] You will be between the ages of 75 and 79 as of May 31, 2020
- [ ] A portion of your monthly benefit is based on disability

The proposed reduction is permanent.

This is an estimate of the effect of the proposed reduction on your benefit under the Plan. It is not a final benefit calculation. This estimate was prepared assuming that the proposed benefit reduction starts on May 1, 2020. If the benefit reduction starts later, the effect of the proposed reduction on your benefit might be different.

This estimate is based on the following information from Plan records:

- You have earned 13.40 years of service* under the Plan through July 31, 2013.
- You will be 58 years and 8 months as of May 31, 2020.
- The portion of your benefit that is based on disability is $0.00.

PBGC Guaranteed Benefits

If the Plan does not have enough money to pay benefits, your monthly benefit would be no larger than the amount guaranteed by PBGC. The amount of your monthly benefit guaranteed by PBGC is estimated to be $479.05*. However, there is concern about the health of the PBGC. If the PBGC becomes insolvent, your benefit could be significantly less.

*Estimated based on the terms of an applicable Qualified Domestic Relations Order (QDRO).

[1] These numbers are just estimates. The actual amount you receive will depend on things like how long you work and when you begin receiving payments. For more information, see the Summary Plan Description available at www.ourbenefitoffice.com/SheetMetalWorkers33.

[2] See description of the proposed reductions of benefits in the General Notice that you have also received for an explanation of the categories of participants.

SHEET METAL WORKERS LOCAL PENSION FUND

VOTER'S GUIDE

Vote by ______________, 2019

Cast your vote on the proposed benefit reduction by [deadline]:

Phone: Call X-XXX-XXXX to vote by phone.

Or

Online: Go to www.XXXXXXX.com to vote online.

The proposed benefit reduction will go into effect May 1, 2020, unless a majority of participants reject it. Not voting has the same effect as voting yes.

The vote is being run by a company selected by the Treasury Department to ensure the integrity of the voting process.

YOUR CHOICE:

Voting YES means:	**Voting NO means:**
On May 1, 2020 monthly benefits for some members will be lowered	There will be no reduction on May 1, 2020 but the Plan may be on the path to running out of money in about 14 years (2033)
Members with disability based benefits and those who are age 80 or older on May 31, 2020 will NOT have their monthly benefits lowered at all	When the Plan runs out of money benefits will be paid by the PBGC and will be much lower that benefits will be if the members vote "YES" on the proposed reduction
Some members who are between age 75 and 80 on May 31, 2020 will have their benefits lowered	When the plan runs out of money benefits will drop for most participants. Others will not see a drop because their benefit is already lower than the PBGC's guaranteed amount
Review pages x – x for statements for and against the reduction	Review pages x – x for statements for and against the reduction

See the enclosed personalized benefit estimate for how your benefit would change under the proposed reduction or if the plan ran out of money and benefits were paid by the PBGC.

* All participants' benefits will be determined based upon the following groups:

		Proposed Suspension
Non-Active Participants	**Retirement Date**	Reduction
Group 1	Before August 1, 2009 and all Terminated Vested Participants	35%
Group 2	On or after August 1, 2009	30%
Active Participants	**Hire Date**	
Group 3	Before May 1, 2006	25%
Group 4	On or after May 1, 2006	No reduction

This change is intended to prevent the Pension Fund from running out of money.

This voter's guide provides information to help you make an informed decision on the proposed benefit reduction for the Sheet Metal Workers Local Pension Plan:

- About the Proposed Reduction
- Statement For the Reduction
- Statement Against the Reduction
- What's Next

Please read this guide and see the enclosed benefit estimate before you make your decision.

About the Proposed Reduction

Unless rejected, effective May 1, 2020, there will be a reduction of benefits earned through April 30, 2020 for active participants, retirees, beneficiaries, and inactive participants with a vested benefit as described in the chart above.

See the enclosed benefit estimate for your actual reduced benefit amount.

No special groups will be treated differently except those required by law:

- Participants with benefits based on disability will have no reduction.
- Participants or beneficiaries who are at least age 80 on May 31, 2020 will have no reduction.
- Participants or beneficiaries who are at least age 75 but under age 80 on May 31,

2020 will have a smaller benefit reduction.

There is no set date when the benefit reductions will end; they will remain in effect indefinitely. However, the benefit reductions will be in effect only until the Plan is no longer projected to run out of money without the reductions in place. We expect reduced benefits to be in place for a long time. For some, that means reduced benefits for the rest of their retirement. For others, there is at least a possibility that their benefit would come back up to the unreduced amount at some point in the future.

This proposed benefit reduction has been approved by the Secretary of Treasury, in consultation with the Pension Benefit Guaranty Corporation (PBGC) and the Secretary of Labor.

See the enclosed benefit estimate for information about YOUR benefit and how much YOUR benefit will be it will be if the reduction is approved.

What if we do nothing?

The Plan's actuary estimates that, unless benefits are reduced, the Plan will not have enough money to pay benefits in the year 2033. This estimate is based on how much money the actuary expects the Plan to receive and to pay out each year. This estimate, which is based on several assumptions, will change every year based on actual investment returns, plan contributions, and other experience. So the actual date could be sooner or later than 2033.

If the Plan does not have enough money to pay benefits, then only the amount guaranteed by the Pension Benefit Guaranty Corporation ("PBGC") will be paid. You can find the amount of your benefit that is guaranteed by the PBGC on the enclosed benefit estimate.

If the PBGC runs out of money, benefits will likely be quite a bit lower than the PBGC-guaranteed amount shown.

Effects of the proposed benefit reduction.

This reduction would take effect on May 1, 2020 and would apply to benefits earned through April 30, 2020.

See the enclosed benefit estimate for information about your benefit and how much it would be if reduced.

The Plan's actuary has certified that, with the reduction of benefits that the Board of Trustees has proposed, the plan should not run out of money. This expectation is based on a number of assumptions; if reality differs significantly from these assumptions, the reduction might not work as intended. However, we have used realistic assumptions to give the Plan the best chance of success.

Statement in Favor of the Reduction:

We, the Trustees of the Sheet Metal Workers Local Pension Plan, believe the plan can be saved with this reduction. If we thought it was hopeless, we wouldn't be going through this process. Our goal is to keep paying as much as we can in benefits for many years to come.

Our options were to try to save the plan or let it run out of money. As we looked at both options, it became clear that we need to try to save the plan. The chart below shows why we want to save the plan, and not let it run out of money.

Try to Save the Plan	Let the Plan Run Out of Money
The most prudent course of action is to do everything possible to keep the Plan from running out of money and to keep paying benefits from the Plan – even if that means paying them at a lower level.	If we let the Plan run out of money those receiving benefits now will continue to get their full amount – but only for a number of years. Everyone else would get lower benefits or, in the worst case, nothing. This hurts the active participants the most, and they are already earning a lower benefit, and paying a higher contribution, than members did in the past.
The proposed reduction is designed to be fair, to reduce benefits in a manner that reflects the history of benefit accruals and subsidized benefits.	There is concern about the financial health of the Pension Benefit Guaranty Corporation (PBGC) – the government corporation that insures pension plans. The PBGC itself may very well run out of money. In that case, it is likely that only a fraction of the PBGC's "guaranteed" benefits would be paid to plans that run out of money.

If we keep the Plan going, we have a better chance of maintaining a strong contribution base – increasing the likelihood of being able to pay benefits over a longer period of time.	If the Plan runs out of money and goes to the PBGC, no one will receive more than the PBGC guaranteed amount.
The Plan still has assets at this time. If benefits are lowered now we can use those assets to earn investment income. Investment income pays for benefits and will help us to restore the Plan.	Right now the Plan has almost $40 million of assets. If we do nothing, the amount of money we have to invest will go down, we will get fewer dollars of investment earnings, and ultimately, the plan will run out of money.

Under this proposal, the reduction applies to benefits earned through April 30, 2020.	If the plan runs out of money, perhaps the hardest hit group would be current active participants, who have already made significant sacrifices.
The current level of benefits being earned is already very low (and the contributions are very high) compared to the benefits and contributions of the past. The benefits being earned by current actives are already reduced. We owe it to them to do everything we can to make sure some of the money they are paying into the fund is left to pay their benefits in the future.	PBGC benefits would be lower than benefits under this proposed reduction. And if the PBGC runs out of money it is likely benefits would be even smaller.
For all participants, benefits under the proposed reduction are higher than what you would receive from the PBGC. See the enclosed benefit estimate for a comparison.	If the Plan goes to the PBGC, not only would benefits be lower than under the proposed reduction, but the decrease would be permanent.
Under the proposed reduction, the people who are least able to recover from a reduced retirement income, including disabled participants and those more than 80 years old are protected from any reduction.	If the Plan runs out of money, benefits will be cut across the board. No population of participants will be protected from reductions.

Statement Against the Reduction:

[to be completed]

What Happens Next:

[Deadline]: Last day to vote

[7 days after deadline]: Results of the vote announced

The Trustees will mail an update with the results of the vote following the announcement

May 1, 2020: Reduction takes effect, unless rejected

K. Response to Revenue Procedure 2017-43 Sections 6.03, 6.04 and Appendix B

The following is a response to Sections 6.03, 6.04 and Appendix B of Revenue Procedure 2017-43. In many cases, we have referenced other materials that are included in this application. Between this response, the May 1, 2017 Actuarial Valuation, the May 1, 2018 PPA Actuarial Certification, and our report titled "Supplemental Information to Actuarial Certification for the Plan Year Beginning May 1, 2018", all assumptions used in the projections required under Section 3.01, 3.02, 4.02(1), 4.03, 6.05 and 6.06 of Revenue Procedure 2017-43 have been described. This section responds to the items in Revenue Procedure 2017-43 Appendix B in the same order laid out in Appendix B.

Part 1 – Actuarial Assumptions and Methods Used for Projections

Investment Returns

Plan Year Beginning May 1	Return
2017*	7.04%
2018**	-0.98%
2019 – 2027	6.62%
2028+	7.85%

* *Based on the April 30, 2017 and April 30, 2018 audited financial statements.*

** *Estimated return based on the December 31, 2018 unaudited financial statements and assuming 2.16% return for January 1, 2019 through April 30, 2019. 2.16% is 4 months of 6.62%, which is the amount derived for the entire year.*

Mortality Assumptions

- Active and Terminated Vested Participants: RP-2014 Blue Collar Employee Mortality Table adjusted to reflect Mortality Improvement Scale MP-2018 from the 2006 base year, and projected forward using MP-2018 on a generational basis.
- Current and Future Retirees, Disabled Participants and Beneficiaries: RP-2014 Blue Collar Healthy Annuitant Mortality Table adjusted to reflect Mortality Improvement Scale MP-2018 from the 2006 base year, and projected forward using MP-2018 on a generational basis.

Other Demographic Assumptions

Retirement Rates

Age	Active Retirement Rates	Terminated Vested Retirement Rates*
55	10%	5%
56	10%	5%
57	10%	5%
58	10%	5%
59	10%	5%
60	10%	5%
61	20%	20%
62	50%	20%
63	50%	10%
64	50%	10%
65 & older	100%	100%

* Applies to both current and future assumed terminated vested participants.

Termination

Age	Less than 2 Years of Service	2 - 4 Years of Service	4 or More Years of Service: Ultimate Rates (Sarason T-5)
20 & under	30.00%	15.00%	7.88%
21	30.00%	15.00%	7.83%
22	30.00%	15.00%	7.79%
23	30.00%	15.00%	7.74%
24	30.00%	15.00%	7.69%
25	30.00%	15.00%	7.64%
26	30.00%	15.00%	7.58%
27	30.00%	15.00%	7.50%
28	30.00%	15.00%	7.39%
29	30.00%	15.00%	7.26%
30	30.00%	15.00%	7.11%
31	30.00%	15.00%	6.94%
32	30.00%	15.00%	6.76%
33	30.00%	15.00%	6.56%
34	30.00%	15.00%	6.35%
35	30.00%	15.00%	6.13%
36	30.00%	15.00%	5.90%
37	30.00%	15.00%	5.66%
38	30.00%	15.00%	5.42%
39	30.00%	15.00%	5.18%
40	30.00%	15.00%	4.93%
41	30.00%	15.00%	4.68%
42	30.00%	15.00%	4.42%
43	30.00%	15.00%	4.16%
44	30.00%	15.00%	3.89%
45	30.00%	15.00%	3.89%
46	30.00%	15.00%	3.63%
47	30.00%	15.00%	3.35%
48	30.00%	15.00%	3.06%
49	30.00%	15.00%	2.75%
50	30.00%	15.00%	2.41%
51	30.00%	15.00%	2.06%
52	30.00%	15.00%	1.70%
53	30.00%	15.00%	1.34%
54	30.00%	15.00%	1.00%
55 & over	30.00%	15.00%	0.00%

Disability

None.

Exclusion of Terminated Vested Participants

None. All terminated vested participants are included.

Assumptions Regarding Form and Commencement of Benefits

- Future retirees are assumed to elect the following forms of payment: 45% elect the single life annuity, 10% elect the ten year certain and life annuity, 20% elect the joint and 50% survivor annuity with pop-up, and 25% elect the joint and 75% survivor with pop-up.
- Terminated vested participants are assumed commence benefits immediately upon retiring. The retirement rates for current and future terminated vested participants are described above.
- We assume no future disabilities because the disability benefit was eliminated effective September 1, 2013.

Assumptions Regarding Missing or Incomplete Data

- Active, terminated vested, retiree and disabled records where gender is not reported are assumed to be male.
- Beneficiary, deferred beneficiary, and alternate payee records where gender is not reported are assumed to be female.
- Spouses are assumed to be opposite gender of the member if gender is not reported.
- Female spouses are assumed to be 3 years younger than male spouses.
- 100% of active and terminated vested participants are assumed to be married.
- For missing pop-up amounts, it was assumed that the pop-up benefit is 112% and 119% of the current benefit for the 50% joint and survivor and 75% joint and survivor options, respectively.

New Entrant Profile

- No assumption was made with respect to the demographic characteristics of new entrants because benefit accruals were suspended effective August 1, 2013. There is no impact on projected plan liabilities and benefit payments from new entrants to the Plan during the projection period. However, we have assumed that there will be replacement of current participants by new entrants based on Trustee input related to projected contribution base units (see below).

Contribution Base Units and Rates

The table below shows the assumed contribution base units (hours) and average contribution rate used for projections shown in this report.

Plan Year Beginning May 1	Total Contribution Base Units (Hours)	Average Contribution Rate (Hourly)
2018	1,178,226	$3.40
2019	1,000,000	$3.45
2020	1,000,000	$3.45
2021	1,000,000	$3.45
2022	950,000	$3.50
2023	950,000	$3.50
2024	950,000	$3.50
2025	950,000	$3.50
2026	950,000	$3.50
2027	950,000	$3.50
2028	950,000	$3.50
2029	950,000	$3.50
2030	950,000	$3.50
2031	950,000	$3.50
2032	950,000	$3.50
2033	950,000	$3.50
2034	950,000	$3.50
2035	950,000	$3.50
2036	950,000	$3.50
2037	950,000	$3.50
2038	950,000	$3.50
2039	950,000	$3.50
2040	950,000	$3.50
2041	950,000	$3.50
2042	950,000	$3.50
2043	950,000	$3.50
2044	950,000	$3.50
2045	950,000	$3.50
2046	950,000	$3.50
2047	950,000	$3.50
2048	950,000	$3.50
2049	950,000	$3.50

Total estimated hours for the plan year May 2018 through April 2019 are 811,559 + 366,667 = 1,178,226. The 811,559 hours for May 2018 through December 2018 was provided by the Fund Office. We are estimating 366,667 hours for January 2019 through April 2019 based on 4/12ths of the 1.1 million hours assumption for the 2018/2019 plan year.

Withdrawal Liability Payments

- No withdrawal liability payments are currently being made and no future withdrawal liability payments are assumed.

Administrative Expenses (Other than Investment-Related Expenses)

- The annual administrative expense assumption is $570,000 for the year beginning May 1, 2018. This is based on the expenses incurred from May 1, 2018 through December 31, 2018 and the anticipated increase in expenses for the remainder of the year due to work related to the resubmission of the application for the proposed suspension of benefits. The administrative expenses are assumed to decrease to $400,000 for the year beginning May 1, 2019 and further decrease to $320,000 for the year beginning May 1, 2020. After May 1, 2020, administrative expenses are assumed to increase by 2.0% per year thereafter for inflation.

Projection Methodology

- No data grouping techniques were used to produce projections.
- No changes or adjustments were made to cash flow projections produced by our valuation software.

Part 2 – Supporting Documentation for Selection of Certain Actuarial Assumptions

Investment Returns

The components of the target portfolio used in the projections, expressed in terms of the asset classes used for setting the Plan's investment policy are as follows:

Asset Class	Allocations
US Equity - Large Cap	2.4%
US Equity - Value	7.5%
US Equity - Mid Cap Value	7.5%
US Equity - Small Cap Value	5.0%
Global Equity	3.0%
Non-US Equity – Developed	10.4%
Non-US Equity – Emerging	0.7%
US Fixed Income	11.6%
Global Bonds	0.6%
US Treasuries (Cash Equivalents)	0.4%
Real Estate	20.0%
Hedge Funds	15.9%
Private Equity	15.0%

The components of the target portfolio were allocated as follows among the asset classes provided in Appendix B of Revenue Procedure 2017-43:

Asset Class	Allocations
US Equity – Large Cap	10.5%
US Equity – Small/Mid Cap	13.3%
Non-US Equity – Developed	11.7%
Non-US Equity – Emerging	1.0%
US Corporate Bonds – Core	11.9%
Non-US Debt Developed	0.3%
US Treasuries (Cash Equivalents)	0.4%
Real Estate	20.0%
Hedge Funds (includes 100% of Absolute Return Assets)	15.9%
Private Equity	15.0%

The 10 and 20-year expected returns (arithmetic returns) shown on Exhibit 15 of the 2018 edition of the Horizon Survey of Capital Market Assumptions were used. The associated standard deviations and correlation coefficients from Exhibit 15 were also used.

This process produced a median geometric return of 6.62% using the 10-year capital market assumptions and a median geometric return of 7.85% using the 20-year capital market assumptions, which were then used to project future investment returns.

Demographic Experience

- An experience study was completed by the prior actuarial firm for the period May 1, 2010 to April 30, 2015. The retirement rates from active status and termination rates were updated as of May 1, 2015 as a result of the experience study. The results of the experience analysis as provided by the prior actuarial firm are shown below. Our understanding is that the prior actuarial firm did not prepare a formal experience study report.

For PYE	Exp Retmnts Would Have Been	Actual Retmnts Were	Actual Retmnts Not Elig	Expected per Valuation	Actual per Valuation
4/30/2015	10.90	4	-	18.80	4.00
4/30/2014	9.40	8	2	15.40	8.00
4/30/2013	10.30	10	4	15.20	10.00
4/30/2012	9.10	5	-	13.50	5.00
4/30/2011	7.50	9	1	19.40	9.00
Total	47.20	36	7	82.30	36

For PYE	Exp w/d's Would Have Been	Actual w/d's Were	Expected per Valuation	Actual per Valuation
4/30/2015	44.84	50	35.0	50
4/30/2014	43.91	48	35.3	48.0
4/30/2013	44.43	41	34.5	41.0
4/30/2012	41.90	20	32.5	20.0
4/30/2011	51.54	70	40.0	70.0
Total	226.61	229	177.300	229

- The historical actuarial gains and losses over the last ten years are shown below. The May 1, 2018 actuarial valuation has not been completed at the time of this filing; as such, the actuarial gains and losses for the plan year beginning May 1, 2017 are unavailable.

Plan Year Ending April 30	Demographic and Administrative Expense (Gain)/Loss	Asset (Gain)/Loss	Total (Gain)/Loss
2017	$(686,979)	$2,537,985	$1,851,006
2016	(205,159)	3,903,376	3,698,217
2015	263,280	2,936,285	3,199,565
2014	30,444	(802,801)	(772,357)
2013	494,878	(647,011)	(152,133)
2012	(1,007,671)	7,955,392	6,947,721
2011	15,363	(2,382,945)	(2,367,582)
2010	170,143	(6,229,620)	(6,059,477)
2009	(237,956)	16,572,030	16,334,074
2008	700,026	1,344,216	2,044,242

- The detailed demographic (gain)/loss for the 2016-2017 plan year by changes in status is provided below. Note the sum of the amounts shown in the table do not match the total shown above due to the (gain)/loss on administrative expenses and benefit payments.

	May 1, 2017 Status				
May 1, 2016 Status	Active	Deferred	In Pay	Non Participating*	Total
Active	$8,336	$46,288	$(73,078)	$(705)	$(19,159)
Deferred	(5,491)	(69,270)	288	(250,746)	(325,219)
In Pay	0	(34,385)	380,621	(775,403)	(429,168)
Not in Data	92	0	111,317	0	111,409
Total	2,938	(57,367)	419,148	(1,026,855)	(662,137)

* Due to deaths, benefit expirations, and data corrections.

- The demographic (gain)/loss for the 2015-2016 plan year by changes in status is provided below. Note the sum of the amounts shown in the table do not match the total shown above due to the (gain)/loss on administrative expenses and benefit payments, and the difference between our replication of the May 1, 2015 actuarial valuation results and the prior actuarial firm's May 1, 2015 actuarial valuation results.

	May 1, 2016 Status				
May 1, 2015 Status	Active	Deferred	In Pay	Non Participating*	Total
Active	$9,191	$13,062	$(4,732)	$(88,091)	$(70,570)
Deferred	(1,405)	14,930	(62,982)	(3,054)	(52,511)
In Pay	0	0	337,507	(842,005)	(504,498)
Not in Data	0	0	27,372	0	27,372
Total	7,785	27,992	297,165	(933,150)	(600,206)

* Due to deaths, benefit expirations, and data corrections.

- The details of the demographic (gain)/loss for years prior to 2015-2016 are unavailable.

- Regarding the assumption that 100% of the active and terminated vested participants are married, we do not receive data on the marital status of the active or terminated vested population. This assumption determines the projected survivor benefits payable to assumed surviving spouses for projected pre-retirement deaths from active and terminated vested status. Given the limitations of the available data and the relatively small impact of the assumption, we believe that the current assumption remains reasonable.

- The distribution of benefit form elections as provided by the Plan Administrator for the last five years (plan years ending April 30, 2013 – April 30, 2017) is shown below. The analysis includes retirements from both active and terminated vested status.

Benefit Form	Percentage Electing
Single Life	42.7%
Five Year Certain and Life	4.5%
Ten Year Certain and Life	9.0%
Joint and 50% Survivor	7.9%
Joint and 50% Survivor with Pop-up	12.3%
Joint and 75% Survivor	3.4%
Joint and 75% Survivor with Pop-up	20.2%

- The retirement rates by age for active participants for the last two years (plan years ending April 30, 2016 and April 30, 2017) are shown below. We did not prepare a retirement experience analysis covering years prior to May 1, 2015 as the prior actuarial firm completed an experience analysis that covered those years.

Age	Exposures	Number Retired	Retirement Rate
55	40	4	10%
56	36	1	3%
57	28	2	7%
58	27	2	7%
59	19	2	11%
60	15	1	7%
61	16	3	19%
62	7	3	43%
63	1	0	0%
64	1	0	0%
65 & over	4	0	0%

- The retirement rates by age for terminated participants for the last five years (plan years ending April 30, 2013 through April 30, 2017) are shown below.

Age	Exposures	Number Retired	Retirement Rate
55	85	5	6%
56	70	2	3%
57	72	2	3%
58	69	2	3%
59	58	2	3%
60	45	4	9%
61	38	8	21%
62	27	4	15%
63	16	1	6%
64	12	3	25%
65 & over	31	2	6%

Mortality Assumptions

- The Plan is not large enough to develop a credible mortality table based exclusively on Plan experience. We have relied on the most recent mortality tables (RP-2014) published by the Society of Actuaries in which credible mortality experience was analyzed. The Plan's participants consist primarily of blue-collar participants; as such, the blue-collar variations of the RP-2014 tables were used.
- With respect to future mortality improvement, the MP-2018 mortality improvement scale was used to project future improvement in mortality from 2006 on a generational basis.

New Entrant Profile

No assumption was made with respect to the demographic characteristics of new entrants because benefit accruals were suspended effective August 1, 2013. There is no impact on projected plan liabilities and benefit payments from new entrants to the Plan during the projection period. However, we have assumed that there will be replacement of current participants by new entrants based on Trustee input related to projected contribution base units (see below).

Contribution Base Units and Employer Withdrawals

- The table below shows the 10-year history of the employers that contributed 5% or more of annual contributions to the Plan as provided on Schedule R (Form 5500).

Plan Year Beginning May 1	Employer Name	Estimated Contribution Base Units*	Hourly Contribution Rate	Total Contributions
2017	EAST COAST METAL SYSTEMS, INC.	124,750	$4.60	$573,852
2017	THE K COMPANY, INC.	83,898	5.18	434,593
2017	R G SMITH CO., INC.	65,308	5.18	338,298
2017	METAL MASTERS, INC.	55,088	5.18	285,354
2016	EAST COAST METAL SYSTEMS, INC.	109,408	4.60	503,277
2016	THE K COMPANY, INC.	81,901	5.18	424,248
2016	R G SMITH CO., INC.	69,216	5.18	358,537
2016	METAL MASTERS, INC.	46,713	5.18	241,975
2015	THE K COMPANY, INC.	82,637	5.18	428,058
2015	EAST COAST METAL SYSTEMS, INC.	90,329	4.60	415,514
2015	R G SMITH CO., INC.	59,532	5.18	308,377
2015	METAL MASTERS, INC.	45,617	5.18	236,295
2015	SHEET METAL CRAFTERS	42,298	5.18	219,103
2015	OHIO FABRICATORS, INC.	38,941	5.18	201,712
2014	EAST COAST METAL SYSTEMS, INC.	95,260	4.60	438,198
2014	THE K COMPANY, INC.	66,050	5.18	342,139
2014	R G SMITH CO., INC.	54,007	5.18	279,758
2014	METAL MASTERS, INC.	52,584	5.18	272,386
2014	OHIO FABRICATORS, INC.	39,168	5.18	202,890
2014	SHEET METAL CRAFTERS	86,325	2.18	188,189
2013	EAST COAST METAL SYSTEMS, INC.	90,020	4.60	414,091
2013	THE K COMPANY, INC.	59,621	5.18	308,837
2013	R G SMITH CO., INC.	57,535	5.18	298,031
2013	OHIO FABRICATORS, INC.	43,266	5.18	224,120
2013	METAL MASTERS, INC.	37,050	5.18	191,921
2012	EAST COAST METAL SYSTEMS, INC.	83,266	4.60	383,024
2012	THE K COMPANY, INC.	62,053	5.18	321,435
2012	R G SMITH CO., INC.	45,724	5.18	236,851
2012	OHIO FABRICATORS, INC.	41,575	5.18	215,361
2012	SHEET METAL CRAFTERS	40,172	5.18	208,093
2012	METAL MASTERS, INC.	35,231	5.18	182,494
2011	EAST COAST METAL SYSTEMS, INC.	96,036	4.03	387,027
2011	THE K COMPANY, INC.	61,132	4.54	277,540
2011	R G SMITH CO., INC.	46,070	4.54	209,160
2011	OHIO FABRICATORS, INC.	45,656	4.54	207,279
2011	METAL MASTERS, INC.	40,331	4.54	183,101
2011	SHEET METAL CRAFTERS	36,881	4.54	167,439
2010	EAST COAST METAL SYSTEMS, INC.	60,372	4.03	243,298
2010	R G SMITH CO., INC.	50,135	4.54	227,612
2010	METAL MASTERS INC.	40,811	4.54	185,281
2010	THE K COMPANY, INC.	37,006	4.54	168,007
2009	GLOBAL INSULATION, INC.	82,434	3.75	309,129
2009	EAST COAST METAL SYSTEMS, INC.	64,256	3.33	213,972
2009	THE K COMPANY, INC.	50,141	3.75	188,029
2009	OHIO FABRICATORS, INC.	43,467	3.75	163,003

* Calculated as Total Contributions divided by Hourly Contribution Rate.

The table below shows the 10-year experience for certain critical assumptions as required under regulation 1.432(e)(9)-1(d)(5)(vi)(A) and Revenue Procedure 2017-43, Section 6.04.

Plan Year Beginning May 1	Total Employer Contributions	Total Contribution Base Units (Hours)	Annual Change in Hours	Average Hourly Contribution Rate	Withdrawal Liability Payments	Market Value Return on Assets
2017	$3,973,912	1,180,488	4.8%	$3.37	$0	7.0%
2016	3,896,375	1,126,133	3.5%	3.46	0	9.1%
2015	3,815,488	1,087,575	4.1%	3.51	0	0.1%
2014	3,696,518	1,044,941	2.9%	3.54	0	7.4%
2013	3,620,036	1,015,775	1.7%	3.56	0	10.6%
2012	3,476,411	998,372	-3.5%	3.48	0	10.3%
2011	3,262,884	1,034,107	12.1%	3.16	0	-7.9%
2010	2,517,134	922,328	-9.9%	2.73	0	14.6%
2009	2,732,416	1,023,122	-4.1%	2.67	0	25.9%
2008	2,619,413	1,066,839	N/A	2.46	0	-30.3%
Compound Annual Growth Rate, 2008 to 2017			1.1%			

- Explanation for the historical trends experienced by the Plan with respect to contribution base units and contribution rates is documented in several sections within the application, including Section 5.01, 5.02(1)(a), 5.02(1)(e), 5.02(3), 5.02(4) and 5.03.
- Contribution rates have increased by over 50% since the implementation of the Rehabilitation Plan effective August 1, 2009. For example, the contribution rate for Building Trades Journeymen – Akron increased from $3.41 per hour before the Rehabilitation Plan to the current $5.18 per hour rate. The original Rehabilitation Plan required annual contribution increases of 10% from 2009 to 2016; however, it was later determined that further increases would harm the funding of Plan. The last required rate increase was a 14% increase in 2012.
- At their November 30, 2017 meeting and reaffirmed at the March 7, 2019 meeting, the Trustees discussed the assumptions for contribution base units for the coming years, ultimately determining that 950,000 for future years will be used. While the Trustees had observed actual hours on average 15% higher than 950,000 during the past five years, the forecasted lesser hours is based on the Trustees' understanding that there had been a short-term upswing in projects that was not predictably sustainable and that several specific projects would be winding down and terminating the near term. This was the basis for the projection and supports the lesser hours forecast.
- The contribution rate projection is based on the expectation that the reduction in contribution base units will disproportionately affect the non-journeymen who are at lower contribution rates to the journeymen.
- No employers have withdrawn from the Plan and been assessed a withdrawal liability during the last five years. In addition, there are no future withdrawal liability payments due to the Plan from previous years' withdrawals.

Take-up rate with respect to selection of benefit/contribution schedule

- All bargaining parties elected the Preferred Schedule of the Rehabilitation Plan.

Projection Methodology

- No approximation techniques were used to produce the projections.
- No changes were made to cash flow projections produced by our valuation software.

Part 3 – Additional Disclosures Relating to Use of Different Assumptions

The following assumptions differed between the projections produced under Section 3.01 and Sections 3.02, 4.02(1), 4.03, 6.05 and 6.06. An explanation for the difference is included.

- Investment returns - For the purpose of the projections included in Section 3.01, we used 6.64% for plan years ending April 30, 2019 through April 30, 2027, and 7.40% for plan years after April 30, 2027. This assumption was set based on the Fund's target asset allocations and the median returns shown in Exhibits 17 and 18 of the 2017 edition of the Horizon Survey of Capital Market Assumptions. The investment return assumption used to develop the projections described in Sections 3.02, 4.02(1), 4.03, 6.05 and 6.06 were developed using updated target asset allocations and the expected returns (arithmetic) shown in Exhibit 15 of the 2018 edition of the Horizon Survey of Capital Market Assumptions.
- Administrative expenses – For the purposes of the projections included in Section 3.01, we assumed that administrative expenses would be $385,000 for the plan year ending April 30, 2019, $287,000 for the plan year ending April 30, 2020, and then increase by 2% per year thereafter. The administrative expense assumption was refined for the projections described in Sections 3.02, 4.02(1), 4.03, 6.05 and 6.06 to reflect the increase in expenses related to the re-submission of the application for the proposed benefit suspension. We have maintained the 2% per year inflationary adjustment beginning with the 2021-2022 plan year.
- Mortality improvement scale – For purposes of the projections included in Section 3.01, we used the MP-2016 mortality improvement scale. For purposes of the projections described in Sections 3.02, 4.02(1), 4.03, 6.05 and 6.06 we used the MP-2018 mortality improvement scale.
- Retirement rates from terminated vested status – For purposes of the projections included in Section 3.01, we assumed that terminated vested participants would commence benefits at age 60 or 62, depending on their date of termination. For purposes of the projections described in Sections 3.02, 4.02(1), 4.03, 6.05 and 6.06 we developed retirement rates by age based on actual experience over the past five years as shown in Part 2 of this exhibit.
- Form of payment – For purposes of the projections included in Section 3.01, we assumed that participants would elect the single life annuity form of payment. For purposes of the projections described in Sections 3.02, 4.02(1) 4.03, 6.05 and 6.06, we added optional forms of payment based on actual experience over the past five years as shown in Part 2 of this exhibit.
- Exclusion of terminated vested participants – For purposes of the projections included in Section 3.01, we assumed that terminated vested participants over age 70 at the valuation date are deceased with no benefit payable. For purposes of the projections described in Sections 3.02, 4.02(1), 4.03, 6.05 and 6.06, we included all terminated vested participants.
- Load for pop-up – For purposes of the projections included in Section 3.01, we assumed a 1.4% load on liabilities for retirees who elected the pop-up option on their joint and survivor benefit. For purposes of the projections described in described in Sections 3.02, 4.02(1), 4.03, 6.05 and 6.06, we valued the actual individual pop-up amount as provided by the Plan Administrator.
- Contribution rate – For purposes of the projections included in Section 3.01, we assumed an average contribution rate of $3.50 per hour each year into the future. For purposes of the projections described in Sections 3.02, 4.02(1), 4.03, 6.05 and 6.06, we used a select and ultimate contribution rate to reflect the temporary increase in non-journeyman who are at lower contribution rates.

SHEET METAL WORKERS LOCAL
PENSION FUND
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TROY, MICHIGAN 48099-0368
(248) 641-4902 or Toll Free (866) 599-3176

POWER OF ATTORNEY AND DECLARATION OF AUTHORIZED REPRESENTATIVE BEFORE THE DEPARTMENT OF TREASURY

Applicant Information:

Board of Trustees, Sheet Metal Local Pension Plan
P.O. Box 368
Troy, MI 48099-0368
EIN: 34-666666753
Plan Number: 001
Tom Wiant, Chairman
Phone: (248) 641-4902
Fax: (248) 813-9898

The Board of Trustees of the Sheet Metal Workers Local Pension Plan hereby appoints the following representatives as attorney-in-fact to represent the taxpayer before the Department of Treasury and perform acts related to the attached application dated March 31, 2019 for suspension of benefits under Internal Revenue Code Section 432(e)(9).

Representative Information:

Paul M. Newcomer pmn@ntclaw.com
Michael A. Novara man@ntclaw.com
Novara Tesija & Catenacci PLLC
888 Big Beaver Road, Suite 600
Troy, MI 48084
EIN: 38-3763096
Phone: (248) 354-0380
Fax: (248) 354-0393

Send copies of notices and communications to representative: Yes

With the exception of the facts described below, I authorize my representative to receive and inspect information, including confidential tax information, and to perform acts that I can perform with respect to the application dated March 31, 2019 for suspension of benefits under Section 432(e)(9) of the Internal Revenue Code. For example, my representative shall have the authority to sign any agreements, consents, or similar documents.

Specific acts not authorized: None

[redacted]

Tom Wiant, Chairman
Signed: March 25, 2019