



MINIBAR SYSTEMS

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August 10, 2008

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
US Department of Labor
200 Constitution Avenue
Washington, DC 20210

Re: Alternative Method of Reporting and Disclosure

Dear Sirs:

52-1865714

Pursuant to Department of Labor ("DOL") regulation Title 29 C.F.R. §2520.104-23, this is to advise you that Minibar North America, Inc. (the "Company"), Employer Identification No. ~~211111~~, 7340 Westmore Road, Rockville, MD 2850, has adopted the following program which constitutes a non-qualified, unfunded, deferred compensation program. The program is maintained primarily for the purposes of providing deferred compensation for a select group of management or highly compensated employees of the Company.

Plan Name: Minibar North America Inc. Non Qualified Deferred Compensation Plan

Current participants: One

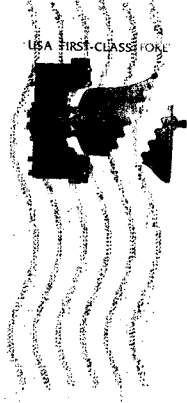
Very Truly Yours,

Patrick J. Galgano
Minibar North America, Inc
Chief Financial Officer



MINIBAR SYSTEMS

7340 Westmore Road
Rockville, MD 20850



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