

**HURLEY TOEVS STYLES
HAMBLIN & PANTER P.A.
ATTORNEYS AT LAW**

EBSA/PUBLIC DISCLOSURE

2011 MAR 14 PM 12:35

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KATHLEEN A. KEENE

March 7, 2011

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Top Hat Plan Exemption
Employee Benefits Security Administration
Room N-1513
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

Re: Notice Pursuant to 29 C.F.R. § 2520.104-23

Ladies and Gentlemen:

The following statement is being filed in accordance with the requirements of 29 C.F.R. § 2520.104-23:

1. Name of Employer: ST. CLOUD MINING COMPANY
2. Address of Employer: 57 DANBURY RD SUITE 201 WILTON, CT 06897
3. Employer Identification Number: 59-1370776
4. ST. CLOUD MINING COMPANY maintains a certain deferred compensation agreement, entitled "St. Cloud Mining Company Phantom Stock Appreciation Rights Plan" primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
5. Number of such agreements: ONE (1)
6. Number of employees covered by each agreement: FIVE (5)

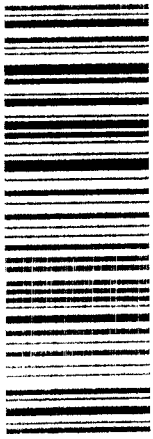
Very truly yours,
**HURLEY, TOEVS, STYLES,
HAMBLIN & PANTER, P.A.**

By: 
Thomas H. Toevs

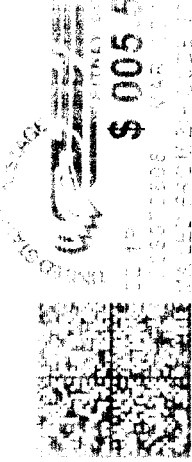
cc: Pushap Goyal

RETURNED MAIL

Thomas H. Toevs
Hurley, Toevs, Styles, Hamblin
& Panter, P.A.
4155 Montgomery Blvd NE
Albuquerque, NM 87111



7008 1630 0003 0796 5155



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US Dept of Labor
200 Constitution Ave NW
Washington DC 20740

**RETURN RECEIPT
REQUESTED**

