

**Snell & Wilmer**  
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LEASEHAWK, LLC DISC

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DENVER  
 LAS VEGAS  
 LOS ANGELES  
 LOS CABOS  
 ORANGE COUNTY  
 PHOENIX  
 SALT LAKE CITY  
 TUCSON

August 9, 2013

**VIA CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

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

Re: LeaseHawk, LLC Unit Appreciation Rights Plan

Dear Sir or Madam:

Enclosed for filing with the Secretary of Labor is a Statement satisfying the alternate form of compliance with the reporting and disclosure requirements of Part 1 of Title 1 of the Employee Retirement Income Security Act of 1974 ("ERISA") with respect to the LeaseHawk, LLC Unit Appreciation Rights Plan (the "Plan"). This Statement is being filed as a protective measure intended to fulfill the requirements set forth in Department of Labor Regulation Section 2520.104-23.

Please note that LeaseHawk, LLC believes that the Plan is not subject to the provisions of ERISA, since it does not provide retirement income to employees or result in the deferral of income by employees for periods extending to the termination of covered employment or beyond. At the same time, LeaseHawk, LLC recognizes that an argument can be made that the Plan is an "employee pension benefit plan" under ERISA. To the extent that such argument has merit, the Plan should qualify for the top hat exception.

Respectfully,

Snell & Wilmer

  
 Gregory R. Gautam

GRG:ceg

Enclosures

**LEASEHAWK, LLC**  
**STATEMENT PURSUANT TO DEPARTMENT OF LABOR**  
**REGULATIONS SECTION 2520.104-23**

LeaseHawk, LLC (the "Company") hereby submits the following information to the Secretary of Labor with respect to the LeaseHawk, LLC Unit Appreciation Rights Plan (the "Plan"), which was executed by an authorized officer of the Company on June 1, 2013.

1. Name and Address of Employer:

LeaseHawk, LLC  
15211 North Kierland Blvd., Suite 300  
Scottsdale, AZ 85254

2. Employer identification number assigned by the Internal Revenue Service to the Company:

45-4232520

3. The Company has entered into the Plan primarily for the purpose of providing transaction-based compensation to a select group of employees.

4. At this time, the Company has no other plans that provide deferred compensation to a select group of management or highly compensated employees. The Plan has eleven current participants.

Dated August 1, 2013

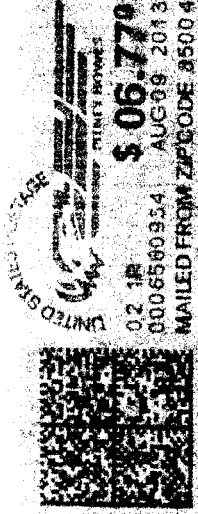
**LEASEHAWK, LLC**

By: Michael E Mueller

Its: MANAGING PARTNER



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