



HILL WARD HENDERSON
ATTORNEYS AT LAW

WRITER'S DIRECT LINE
(813) 222-8703

February 20, 2015

**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, D.C. 20210

2015 FEB 27 09:15
U.S. DEPARTMENT OF LABOR
EMPLOYEE BENEFITS SECURITY ADMINISTRATION

Re: Top Hat Plan Filing – Halstatt, LLC Deferred Compensation Plan

Dear Sir or Madam:

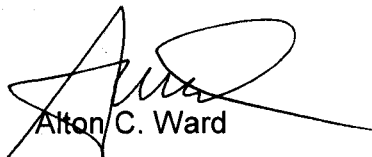
The following information is disclosed in order to comply with the reporting and disclosure requirements of the Employee Retirement Income Security Act of 1974, under the alternative method of compliance as set forth by DOL Regulations Section 2520.104-23.

Halstatt, LLC (the "Employer") maintains the Halstatt, LLC Deferred Compensation Plan (the "Plan").

1. The address of the Employer is 2600 Golden Gate Parkway, Naples, FL 34105
2. The Employer's tax identification number is 65-0022259.
3. The Employer maintains the plan primarily for the purpose of providing deferred compensation for select key management or highly compensated employees.
4. The number of such plans is 1.
5. The number of employees eligible to participate in the Plan is 5.

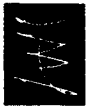
If you require a copy of the plan document or any additional information, please contact the undersigned.

Sincerely,



Alton C. Ward

ACW/cc
cc: Patrick George



HILL WARD HENDERSON
ATTORNEYS AT LAW

CERTIFIED MAIL



9314 8699 0430 0010 7924 01
RETURN RECEIPT (ELECTRONIC)

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

