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July 27, 2018

VIA UPS

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-1513
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

RE: Newport Harbor Stock Appreciation Rights Plan

To Whom It May Concern:

Pursuant to Reg. Section 2520.104-23, Newport Harbor Corporation hereby files the following statement to establish an alternative method of compliance with the reporting and disclosure requirements of Part 1 of Title 1 of the Employee Retirement Income Security Act of 1974, as amended, with respect to the above unfunded Plan:

1. Name and address of Employer:

Newport Harbor Corporation
366 Thames Street
Newport, RI 02840

2. Employer Identification Number of Employer: 05-0191225

3. Newport Harbor Corporation adopted the Newport Harbor Stock Appreciation Rights Plan on June 22, 2015. The Stock Appreciation Rights Plan is currently intended to cover five (5) participants. Newport Harbor Corporation does not maintain any other plan for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

If you have any questions or need any further information, please contact the undersigned.

Very truly yours,

Steiker, Greenapple & Crocut, P.C.

Tabitha M. Crocut, Esq.
E-mail: tcrocut@esoplegal.com

TMC:bmw
Enclosure

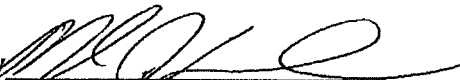
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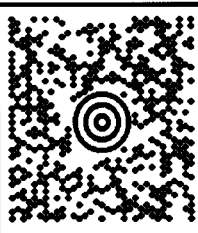



NEWPORT HARBOR CORPORATION
TOP HAT PLAN EXEMPTION NOTICE

1. Name and address of employer: Newport Harbor Corporation
2. Employer Identification number: 05-0191225
3. Newport Harbor Corporation maintains the following plan(s) primarily for the purpose of providing deferred compensation for select groups of management or highly compensated employees:
 - (a) Newport Harbor Stock Appreciation Rights Plan
4. Number of participants: 5

This information in the within statement filed with Secretary of Labor is current as of this 27 day of July, 2015

NEWPORT HARBOR CORPORATION

By 
NAME Michael J. Lamond
Title Treasurer

<p>MWOESSNER STEIKER, GREENAPPLE & CROSCUT, 77 COLLEGE STREET BURLINGTON VT 05401</p>	<p>0.5 LBS LTR</p>	<p>1 OF 1</p>
<p>SHIP TO: PENSION AND WELFARE BENEFIT'S ADMIN 2026935000 U.S. DEPARTMENT OF LABOR ROOM N-1513 200 CONSTITUTION AVE NW WASHINGTON DC 20210</p>		
	<p>MD 201 9-78</p> 	<p>UPS 2ND DAY AIR 2</p> <p>TRACKING #: 1Z 172 0W1 02 9569 2973</p>
		
<p>BILLING: P/P</p>		
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