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February 12, 2016

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED
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U.S. Department of Labor
Employee Benefits Security Administration
Top Hat Plan Exemption
200 Constitution Avenue, NW, N-1513
Washington, DC 20210

Re: CT Holdings, Inc. Stock Appreciation Rights Plan

Dear Sir or Madam:

This statement constitutes a filing under 29 C.F.R. §2520.104-23 on behalf of CT Holdings, Inc. ("Employer"):


CT Holdings, Inc.
60 Sycamore Street West
St. Paul, MN 55117

EIN: 80-0886220

The Employer maintains the above-referenced plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees that presently covers two (2) employees. This is a protective filing, which will only be applicable in the event the above plan provides deferred compensation and is an employee pension benefit plan. If you need any further information, please contact me.

Very truly yours,

LINDQUIST & VENNUM LLP

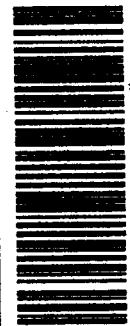


Joshua T. Natzel

JTN:tar

cc: CT Holdings, Inc.

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RETURN SERVICE REQUESTED

U.S. DEPARTMENT OF LABOR
EMPLOYEE BENEFITS SECURITY ADMINISTRATION
TOP HAT PLAN EXEMPTION
200 CONSTITUTION AVENUE NW, N-1513
WASHINGTON, DC 20210

