

2520162670102

July 22, 2016

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Sutter Home Winery, Inc. - Deferred Compensation Plan
Top-Hat Plan Exemption

Ladies and Gentlemen:

On behalf of Sutter Home Winery, Inc., we are filing this to claim the "top-hat plan" exemption from the reporting and disclosure requirements of Title I of ERISA for a new non-qualified deferred compensation plan which Sutter Home Winery, Inc. has established for a select group of its management and highly compensated employees, effective July 1, 2015.

As required by DOL Regulation Section 2520.104-23, we advise you of the following information:

Name and Address of Employer: Sutter Home Winery, Inc.
277 St. Helena Hwy (Hwy 29)
South St. Helena, CA 94574

Employer ID No.: 94-1080860

Name of Plan: The 2015 Sutter Home Winery, Inc. Deferred Compensation Plan

Number of Plans: As of the date of this filing, Sutter Home Winery, Inc. maintains two non-qualified plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. 15 highly compensated management employees currently participate in the Executive Deferred Compensation Plan.

Upon request, Sutter Home Winery, Inc. will provide copies of further documentation related to the Deferred Compensation Plan to the Department of Labor.

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U.S. Department of Labor
July 22, 2016
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By filing this statement, Sutter Home Winery, Inc. should qualify for the exemption from the reporting and disclosure provisions of Title I of ERISA with respect to the Deferred Compensation Plan. In order to confirm receipt of this, please date-stamp and return the enclosed additional copy of this letter to us in the envelope provided.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bennett H. Speyer", written in a cursive style.

Bennett H. Speyer

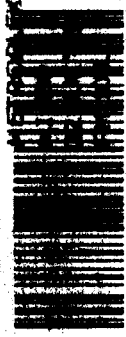
BHS:hla

cc: Mark A. Smithers, CFO

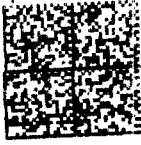
SHUMAKER
Shumaker, Loop & Kendrick, LLP

1000 Jackson Street
Toledo, Ohio 43604-5573

CERTIFIED MAIL



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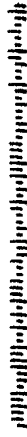


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