



Warner Norcross + Judd LLP

FOIA/PUBLIC DISCLOSURE

2018 OCT 15 PM 3:14

October 10, 2018

U.S. Department of Labor  
Employee Benefits Security Administration  
Top Hat Plan Exemption  
200 Constitution Avenue, NW, Room N-1515  
Washington, DC 20210

2520183370018

Re: **Netlink Software Group America, Inc. Stock Appreciation Rights Plan  
Top Hat Plan Alternative Reporting Method**

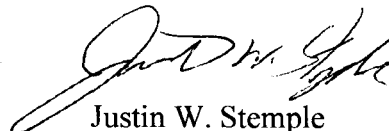
Ladies and Gentlemen:

This is notice on behalf of Netlink Software Group America, Inc. that it has established the Netlink Software Group America, Inc. Stock Appreciation Rights Plan ("Plan"), an unfunded deferred compensation plan. Pursuant to the alternative reporting method of compliance set forth in Department of Labor Reg. 2520.104-23, we notify you of the following with respect to the Plan:

1. Sponsoring Employer: Netlink Software Group America, Inc.
2. Address: 999 Tech Row Madison Heights, Michigan 48071
3. EIN: 52-2232401
4. Plan Purpose: Provide deferred compensation for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
5. Current Number of Participants in the Plan: 3
6. Number of plans included in this notice: 1

If you have any questions regarding this matter, please direct your inquiry to the undersigned.

Very truly yours,



Justin W. Stemple

By Certified Mail  
17662842-2

Justin W. Stemple | Partner

D 616.752.2375

E jstemple@wnj.com

900 Fifth Third Center, 111 Lyon Street, N.W.

Grand Rapids, MI 49503-2487



**Warner Norcross + Judd**

900 Fifth Third Center  
111 Lyon Street NW  
Grand Rapids, MI 49503-2487

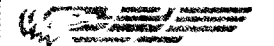
**CERTIFIED MAIL**



7017 2680 0000 2022 9637



U.S. POSTAGE >> FITNEY BOWES



ZIP 49503 \$ 006.67<sup>0</sup>  
02 1W  
0001387105 OCT 10 2018

**Return Receipt Requested**

U.S. Department of Labor  
Employee Benefits Security Administration  
Top Hat Plan Exemption  
200 Constitution Avenue, NW, Room N-1515  
Washington, DC 20210

