

ROY'S HOLDINGS, INC.
6600 KALANIANA'OLE HWY, SUITE 110
HONOLULU, HI 96825

USA/PUBLIC DISCLOSURE
2018 OCT 17 PM 3: 21

OCTOBER 10, 2018

Personal & Confidential
Via Certified Mail – Return Receipt Requested

2520183370020

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

Re: Alternative Method of Compliance with Reporting and Disclosure Requirements
Pursuant to Section 2520.104-23 of the Department of Labor Regulations

Dear Sir or Madam:

This statement is filed in accordance with the requirements of the above-captioned regulations and in lieu of Internal Revenue Service Form 5500:

Employer Name, Address and Taxpayer Identification Number

Roy's Holdings, Inc.
6600 Kalaniana'ole Hwy, Suite 110
Honolulu, HI 96825
99-0341036

Statement as to Plan

The Employer maintains, at the above address, the Roy's Holdings, Inc. Management Incentive Plan (the "**Plan**") primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. At present, 0 employees participate in the Plan.

ERISA Compliance

The Employer is making this filing solely as a protective measure in the unlikely event its Plan should be determined at some point to be an employee benefit plan as defined in section 3(3) of ERISA. This form and this filing are not, and should not be construed as, an admission by the Employer that the Plan is an employee benefit plan subject to ERISA for any purpose.

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Employee Benefits Security Administration
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Copy of Plan

A copy of the Plan will be provided to the Department of Labor upon request.

Sincerely, 

ROY'S HOLDINGS, INC.



Roy Yamaguchi, Chief Executive Officer

cc: Christopher T. Horner II (chorner@holzmanhorner.com)

Holman Turner LLC
1875 J St. NW
Washington DC 20006

CAPITAL DISTRICT 200

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