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8565 Magellan Parkway, Ste 400, Richmond, Virginia 23227 Phone: (804) 730-1568 Fax: (804) 746-1669

January 3, 2019


**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

TO: Secretary of Labor
Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

FROM: GPM Investments, LLC
8565 Magellan Parkway, Suite 400
Richmond, VA 23227
E.I.N: 55-0807113

GPM Investments, LLC (the "**Employer**") maintains the GPM Investments, LLC Non-Qualified Plan (the "**Plan**") primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. This is the only non-qualified deferred compensation plan maintained by the Employer. The number of employees participating in the Plan is thirteen (13).

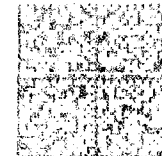
GPM Investments, LLC

By: 
Name: Arie Kotler
Title: CEO



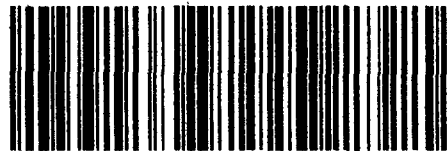
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