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ROBERTA P. GRANADIER  
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(248) 433-7552

July 9, 2019

**Via Certified Mail**  
**Return Receipt Requested**  
7017 1450 0001 9329 5815

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

**2520192040049**

**Re: Statement Pursuant to Department of Labor Regulation Section 2520.104-23**

Dear Sir or Madam:

We are legal counsel to Haviland Enterprises, Inc. We file this statement on behalf of Haviland Enterprises, Inc. pursuant to Department of Labor Regulation Section 2520.104-23.

Name and Address of Employer:	Haviland Enterprises, Inc. 421 Ann Street Northwest Grand Rapids, Michigan 49504
Employer Identification No.:	38-1273016

Haviland Enterprises, Inc. has adopted the following plans that are unfunded employee benefit plans under ERISA maintained for the purpose of providing deferred compensation for a select group of management or highly compensated employees of Haviland Enterprises, Inc. and certain related entities:

**Haviland Enterprises, Inc. Management Incentive Plan,  
as amended and restated January 1, 2019**

- As of the date of this letter, this plan has approximately 10 participants

**Haviland Enterprises, Inc. Stock Appreciation Rights Agreement for CEO**

- As of the date of this letter, this plan has 1 participant

**Haviland Enterprises, Inc. Equity Incentive Plan for Directors**

- As of the date of this letter, this plan has approximately 4 participants

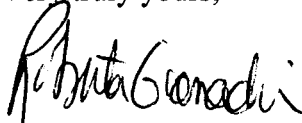
**Haviland Enterprises, Inc. Performance Share Agreement**

- As of the date of this letter, this plan has 1 participant

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The plan administrator of each plan will provide the Department of Labor plan documents upon request, as required by ERISA Section 104(a)(6). If you should have any questions, please contact the undersigned at (248) 433-7552.

Very truly yours,



Roberta P. Granadier

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DICKINSON WRIGHT PLLC

2500 W. BIG BEAVER ROAD, SUITE 300  
TROY, MI 48064-3312

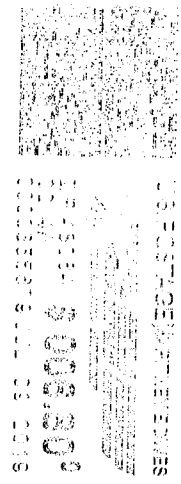
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**CERTIFIED MAIL**



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