

August 8, 2019

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

RE: Dunbar & Brawn Construction, Inc. Stock Appreciation Rights Plan

To Whom It May Concern:

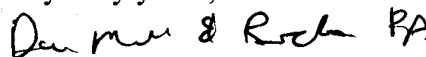
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Pursuant to Reg. Section 2520.104-23, Dunbar & Brawn Construction, Inc. hereby files the following statement to establish an alternative method of compliance with the reporting and disclosure requirements of Part 1 of Title 1 of the Employee Retirement Income Security Act of 1974, as amended, with respect to the above unfunded Plan:

1. Name and address of Employer:
Dunbar & Brawn Construction, Inc.
223 Hildreth Street North
Bangor, ME 04401
2. Employer Identification Number of Employer:
20-1560226
3. Dunbar & Brawn Construction, Inc. adopted the Dunbar & Brawn Construction, Inc. Stock Appreciation Rights Plan on July 26, 2019. The Stock Appreciation Rights Plan currently covers three (3) participants. Dunbar & Brawn Construction, Inc. does not maintain any other plan for the purpose of providing deferred compensation for a select group of management or highly compensated employees

If you have any questions or need any further information, please contact the undersigned.

Very truly yours,



Devine, Millimet & Branch, Professional
Association

Cc: Scott Dunbar, Dunbar & Brawn Construction, Inc. (via electronic copy)

**DEVINE
MILLIMET**

ATTORNEYS AT LAW

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MANCHESTER
NEW HAMPSHIRE 03101

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NH 030
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