

Morgan Lewis

US DEPARTMENT OF
LABOR

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EBSA
PUBLIC DISCLOSURE

May 27, 2020

**BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

2520202110049

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:

On behalf of Downes Holding Company, Inc., we are hereby submitting the following information with respect to its top-hat plan, pursuant to DOL Regulation Section 2520.104-23:

I. EMPLOYER NAME, ADDRESS AND TAXPAYER IDENTIFICATION NUMBER:

Downes Holding Company, Inc.
200 Stanley Street
New Britain, CT 06051

Taxpayer Identification Number: 84-4247352

II. STATEMENT AS TO PLAN:

Downes Holding Company, Inc. maintains, at the above address, the Downes Holding Company, Inc. Management Incentive Plan ("Plan") for the benefit of a select group of management or highly compensated employees. The primary purpose of the Plan is to attract and retain qualified and competent employees upon whose efforts and judgment the company's success is largely dependent. The number of employees participating in the Plan is four (4).

III. ERISA COMPLIANCE:

The company is making this filing with respect to the Plan solely as a protective measure in the unlikely event that the Plan would 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

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② +1.312.324.1001

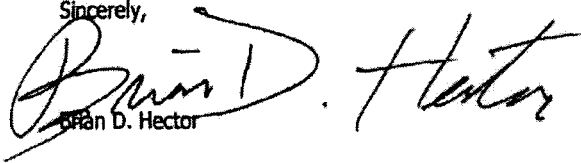
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should not be construed as, an admission by the company that the Plan is an employee benefit plan subject to ERISA for any purpose.

IV. COPY OF PLAN:

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

Sincerely,



Brian D. Hector

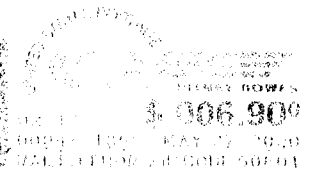
cc: Mr. David Patrick

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77 West Wacker Drive
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