




STATE OF DELAWARE
DEPARTMENT OF STATE

September 19, 2019



RE: Secretary of State's Abandoned or Unclaimed Property Voluntary Disclosure Agreement Program

Dear 

This letter is being sent because  and its subsidiaries and related entities (hereinafter referred to collectively as "the Company") have been identified as likely being out of compliance with Delaware law, 12 *Del. C.* ch. 11, as it relates to reporting dormant, abandoned, or unclaimed property. I am inviting the Company to participate in the Delaware Secretary of State's Abandoned or Unclaimed Property Voluntary Disclosure Agreement Program ("SOS VDA Program") to avoid being sent an audit notice by the Delaware Department of Finance. I strongly encourage the Company to enroll in the VDA program as soon as possible. An audit notice will be issued by the Delaware Department of Finance 60 days after the date of the mailing of this letter.

Since the Delaware VDA program was created in 2012, more than 1,000 companies have enrolled in this business-friendly process whereby companies may "catch up" on past due abandoned or unclaimed property obligations, avoid the time and expense of an audit, and may significantly reduce their liability. Under the laws of all 50 states, companies holding dormant, abandoned, or unclaimed property have an annual reporting responsibility to remit such property to the appropriate state.

Pursuant to our state laws, Delaware cannot initiate new abandoned or unclaimed property examinations (audits) unless a company has first been notified in writing by the Secretary of State that it may enter into the SOS VDA Program. This letter serves as such notice to the Company of its unclaimed property reporting obligations.

Please be advised that the Delaware Department of Finance, a separate state agency, is charged with conducting unclaimed property examinations. Companies that do not enroll in the SOS VDA Program within 60 days of the receipt of this letter will be referred to the State Escheator for examination. Once an examination notice is mailed by the Department of Finance, a company becomes ineligible to enter into the Secretary of State's VDA Program, and the Secretary of State is statutorily prohibited from permitting the company to enroll.

To enroll in the SOS VDA Program, please visit www.VDA.Delaware.gov and complete Form VDA-1, which can be found under the "Forms and Guidelines" tab at the top of the website. Submission instructions are included in Form VDA-1.

Any questions may be directed to . Thank you for your time and attention to this matter.

Sincerely,



CC:
Via Certified Mail: 

TOWNSEND BUILDING
401 FEDERAL STREET, SUITE 3
DOVER, DE 19901