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ITOCHU International Inc.
335 Madison Avenue
New York, N.Y. 10017
TEL: (212) 818-8000
FAX: (212) 818-8361-63

June 27, 2006

Top-Hat Plan Exemption
EBSA
Room N-1513
U.S. Department of Labor
200 Constitution Ave., NW
Washington, DC 20210

06 JUL -5 PM 3:01

Re: Notice of Plans of Deferred Compensation

Gentlemen:

Pursuant to DOL Regulation Section 2520.104-23, the undersigned Employer hereby files the following information with respect to its plans of deferred compensation:

- (1) Name and Address of Employer: Itochu International, Inc.
335 Madison Avenue
New York, NY 10017
- (2) Employer Identification (EIN) #: 13-1850807
- (3) The Employer, including members of its controlled group, as defined under Internal Revenue Code Section 414(b), maintains 11 plans of deferred compensation, primarily for the purpose of providing deferred compensation to a select group of management or highly compensated employees.
- (4) 78 employees are covered by such plans.

Very truly yours,

ITOCHU International Inc.

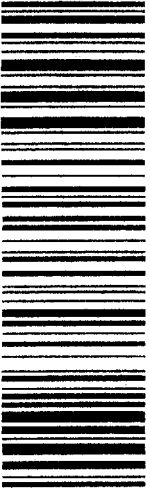
By:

 6/27/06

ITOCHU International Inc.
335 Madison Ave
New York, NY 10017

Dept. 861I

Use this Dept. Code for all correspondence.



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