



## *Covenant Village, Inc.*

*A Full Service Retirement Community*

1351 Robinwood Road • Gastonia, North Carolina 28054 • (704) 867-2319 • Fax (704) 854-8738

September 29, 2006

Certified Mail – Return Receipt Requested

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

Dear Sir or Madam:

Covenant Village, Inc. (the "Plan Sponsor") has established the Covenant Village, Inc. Supplemental Deferred Compensation Plan (the "Plan"). The Plan Sponsor maintains the Plan primarily for the purpose of providing benefits for a select group of management or highly compensated employees. The Plan is unfunded and a "pension plan" within the meaning of Section 3(2) of the Employee Retirement Income Security Act of 1974, as amended (ERISA).

In compliance with the requirements of the alternative method of reporting and disclosure under Part I of Title I ERISA for unfounded pension plans for a select group of management or highly compensated employees, specified in Department of Labor Regulations, 29 C.F.R. §2520.104-23, the following information is provided by the Plan Sponsor:

- |    |                                      |   |
|----|--------------------------------------|---|
| 1. | Name and address of Plan Sponsor:    | Covenant Village, Inc.<br>1351 Robinwood Road<br>Gastonia, NC 28054 |
| 2. | Employer Identification Number:      | 56-1274448  |
| 3. | Number of Such Benefit Arrangements: | One   |
| 4. | Number of Employees Participating:   | One   |
| 5. | Plan Placed in Effect:               | September 29, 2006  |

Yours very truly,

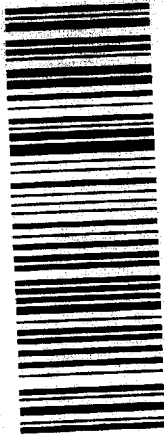
Herbert W. Price, Treasurer  
Board of Directors

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U.S. DEPARTMENT OF LABOR  
EMPLOYEE BENEFITS SECURITY ADMINISTRATION



**Covenant Village, Inc.**  
1351 Robinwood Road ■ Gastonia, North Carolina 28054



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