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U.S. DEPT. OF LABOR

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January 8, 2007

CERTIFIED MAIL –
RETURN RECEIPT REQUESTED

Top Hat Plan Exemption
Employee Benefits Security Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210

Re: Non-Qualified Deferred Compensation Plan

Gentlemen:

Pursuant to Department of Labor Regulations Section 2520.104-23, "Alternative Method of Compliance for Pension Plans for certain Selected Employees," under the Employee Retirement Income Security Act of 1974 ("ERISA"), please be advised as follows:

On January 1, 2007, Russell Lands, Inc., 2544 Willow Point Road, Alexander City, Alabama, adopted a Non-Qualified Deferred Compensation Plan for a select group of highly compensated employees as well as the company's directors. The plan sponsor's EIN number is 63-0455398

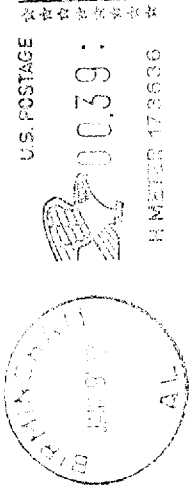
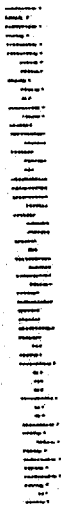
The deferred compensation plan is maintained solely for the purpose of providing deferred compensation for the eligible select group of management or highly compensated employees and directors specified under the plan. The sponsor maintains one such plan, covering eight eligible employees as of the plan's effective date.

A copy of the above described plan will be furnished upon request.

Very truly yours,



Tom Lamberth
President and Chief Operating Officer



C A P I T A L



S T R A T E G I E S

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