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January 22, 2008

REGISTERED MAIL
No. RR 095 724 951 US

Top-Hat Plan Exemption
Employee Benefit and Security Administration
Room N-1513
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, D.C. 20210

08 FEB 13 AM 8:53


Re: St. Luke's Health Initiatives Ineligible 457(f) Plan Number 2
Tax Identification Number: 86-0097240

Dear Sirs:

We are enclosing a copy of the Top-Hat Plan Disclosure Statement for the above referenced Plan.

Very truly yours,

ONSAGER, WERNER & OBERG, P.L.C.

By 
Robert J. Werner

RJW/psw

Enclosure

cc: Roy Pringle

January 2, 2008

Top-Hat Plan Exemption
Employee Benefit and Security Administration
Room N-1513
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, D.C. 20210

Gentlemen:

Pursuant to DOL Reg. § 2520.104-23, we are hereby filing this statement with the Secretary of Labor in order to satisfy the reporting and disclosure requirements of Part 1 of Title I of ERISA with respect to the St. Luke's Health Initiatives Ineligible 457(f) Plan Number 2 (the "Plan"). Our statement required by DOL Reg. § 2520.104-23 is as follows:

(1) Name of employer sponsoring the Plan:

Name: St. Luke's Health Initiatives

(2) Address: 2929 N. Central Avenue, Suite 1550
Phoenix, Arizona 85012

(3) Tax identification number of the employer sponsoring the Plan: **86-0097240**

(4) The employer maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated individuals.

(5) The Plan is the third plan maintained by the employer that fits within the plan description in (4) above.

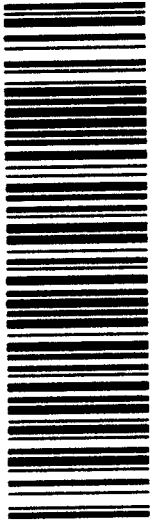
(6) The Plan will cover one (1) employee as of its January 1, 2008, effective date.

ST. LUKE'S HEALTH INITIATIVES

By 
Its Executive Director

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Phoenix, AZ 85012

United States Postal Service
REGISTERED MAIL

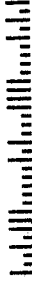


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