

July 8, 2009

EBSA/PUBLIC DISCLOSURE

2009 JUL 15 AM 7:00

Top Hat Plan Exemption
 Pension and Welfare Benefits Administration
 Room N-1513
 U.S. Department of Labor
 200 Constitution Avenue NW
 Washington, DC 20210

Dear Sir or Madame:

This statement is filed under DOL Regulations § 2520.104-23.

Employer: APCO Employees Credit Union

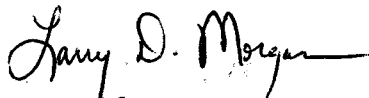
Address: 1608 7th Avenue North
Birmingham, AL 35203Employer ID
Number:63-0328360

Effective May 1, 2009, the Employer adopted the following plan primarily for the purpose of providing deferred compensation for a member of the select group of management or highly compensated employees:

Plan	Number of Participants
Executive Supplemental Retirement Plan Agreement for E. Thomas Williams	1

The Employer will provide plan documents to the Secretary of Labor on request.

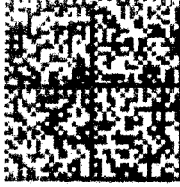
Sincerely,



Larry D. Morgan
 Chief Executive Officer



APCO EMPLOYEES CREDIT UNION
 1608 7TH AVENUE, NORTH
 BIRMINGHAM, ALABAMA 35203



FIRST CLASS

049J82038222

\$00.440

07/09/2009

Mailed From 35203

US POSTAGE

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 US Dept of Labor
 200 Constitution Ave NW
 Washington DC 20210