

2520100070572

30 Rockefeller Plaza, New York, NY 10112

tel (212) 408-5100 fax (212) 541-5359

CHADBOURNE
& PARKE LLP

EBSA/PUBLIC DISCLOSURE

David Gallai
direct tel (212) 408-1033 fax (646) 710-1033
dgallai@chadbourne.com

2009 DEC 29 AM 10: 28

December 23, 2009

U.S. Department of Labor
Employee Benefits Security Administration
Top Hat Plan Exemption
200 Constitution Avenue, NW, N-1513
Washington, DC 20210


Re: Avon Products, Inc. International Retirement Plan

Dear Sir or Madam:

On behalf of Avon Products, Inc., submitted herewith is the "top hat" statement required by Department of Labor Regulation § 2520.104-23, to be filed with the Department of Labor for unfunded pension plans maintained by an employer for a select group of management or highly compensated employees.

If you have any questions or need additional information, I can be reached at (212) 408-1033.

Very truly yours,



David Gallai

Enclosure

VIA FEDERAL EXPRESS

**STATEMENT OF COMPLIANCE
UNDER
DEPARTMENT OF LABOR
REGULATION § 2520.104-23**

This statement is being filed with the Department of Labor under Department of Labor Regulation § 2520.104-23 which provides an alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of the Employee Retirement Income Security Act of 1974, as amended (the "Act") for unfunded pension plans maintained by an employer for a select group of management or highly compensated employees, pursuant to the authority of the Secretary of Labor under Section 110 of the Act.


The following is the information required to be disclosed:

1. Name and address of employer:

Avon Products, Inc.
1345 Avenue of the Americas
New York, New York 10105-0196
2. Internal Revenue Service Employer Identification Number:

13-0544597
3. Avon Products, Inc. ("Avon") maintains the Avon Products, Inc. International Retirement Plan (the "Plan") primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees of Avon.
4. Avon Products, Inc. is filing this statement with respect to the Plan, which covers five (5) employees.

AVON PRODUCTS, INC.

By: 
Name: Amy White Byrne
Title: Vice President, Compensation and Benefits

Date: December 21, 2009

FOR

Express


RT 689 1 5260 12.24
FZ

Handwritten signature

ORIGIN ID: OXCA (212) 408-5185
RACHEL KURTH
CHADBOURNE PARKE LLP
30 ROCKEFELLER PLZ
NEW YORK NY 10112
UNITED STATES

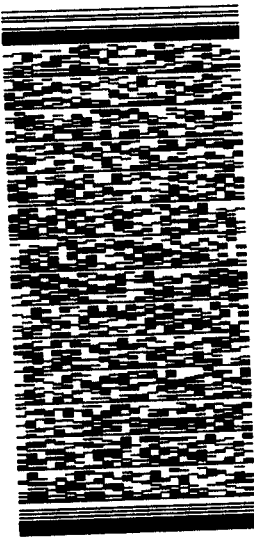
Ship Date: 23DEC09
Actual Wgt: 1.1 LB
System#: 174207
Account: S 0100-1822-6

TO: EMPLOYEE BENEFITS SECURITY ADMIN
U.S. DEPARTMENT OF LABOR
TOP HAT PLAN EXEMPTION
200 CONSTITUTION AVENUE NW
N1513
WASHINGTON, DC 20210-0001

Ph: (212) 408-5185
FedEX
Express


(US)

PKID: Z900000087277 TRK: 917623965260

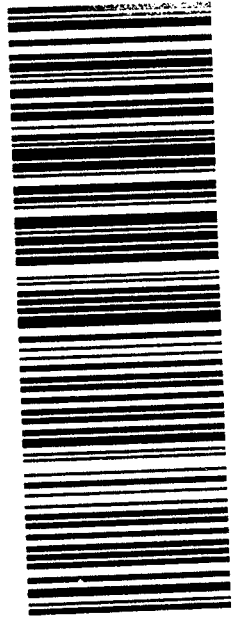


Delivery Address Barcode

The World

PRIORITY OVERNIGHT
TRK# 9176 2396 5260 Form 0201
DCA A2

20210 -DC-US ZDTSGA



THU
Deliver By:
24DEC09

Align bottom of Peel and Stick Airbill or Pe here.