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BACARDI U.S.A., INC.

EBSA/PUBLIC DISCLOSURE

2011 MAR 28 PM 12:23

March 21, 2011

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

Re: "Top Hat" Filing for the Executive Retirement and Savings Plan of Bacardi U.S.A., Inc. and Affiliates

Dear Sir or Madam:

On behalf of the ERSP Committee, the plan administrator of the Executive Retirement and Savings Plan of Bacardi U.S.A., Inc. and Affiliates, this letter constitutes a "top hat" plan filing pursuant to 29 C.F.R. Section 2520.104-23 in respect of such plan.

Name and address of employer: Bacardi U.S.A., Inc.
2701 S. Le Jeune Rd.
Coral Gables, FL 33134

EIN of employer: 13-1507147

Declaration of employer: The Executive Retirement and Savings Plan of Bacardi, U.S.A., Inc. and Affiliates is maintained primarily for the purpose providing deferred compensation to a select group of management or highly compensated employees.

Number of plans covered by this filing: 1

Number of employees in plan: 32 (as of January 1, 2011)

Please contact the undersigned if more information is needed concerning this filing.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Frederick J. Wilson, III', written over a horizontal line.

Frederick J. Wilson, III
Sr. Vice President, General Counsel & Secretary

BACARDI - THE WORLD'S GREAT RUMS

2701 LE JEUNE ROAD, CORAL GABLES, FLORIDA 33134
TEL: (305) 573-8511 FAX: (305) 573-0756

BACARDI AND THE BAT DEVICE ARE REGISTERED TRADEMARKS OF BACARDI & COMPANY LIMITED

1 DIRECTOR'S COPY



BACARDI U.S.A., INC.

2701 LE JEUNE ROAD, CORAL GABLES, FLORIDA 33134

PLACE STICKER AT TOP OF ENVELOPE
TO THE RIGHT OF RETURN ADDRESS.
FOLD AT DOTTED LINE

CERTIFIED MAIL



7000 0520 0016 3396 2262

U.S. Department of Labor
Employee Benefits Security Admin.
200 Constitution Avenue, NW
Room - U1573
Washington, DC 20010