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**Bristol-Myers Squibb**

EBSA/PUBLIC DISCLOSURE  
PO Box 4500 Princeton, NJ 08543-4500 609-897-2000  
2011 SEP 12 PM 1:12

**CERTIFIED MAIL**

August 30, 2011

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

Re: **Informational Filing Under DOL Reg. Sec. 2520.104-23**

Dear Sir/Madam:

In accordance with DOL Reg. Sec. 2520.104-23, **Bristol-Myers Squibb Puerto Rico, Inc.** (the "Plan Sponsor") hereby declares that it maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The name of the Plan is the **Bristol-Myers Squibb Puerto Rico, Inc. Benefits Equalization Plan-Savings and Investment Program** (the "Plan"). The Plan covers approximately 14 employees.

The name, address and employer identification number of the Plan Sponsor are:

**Bristol-Myers Squibb Puerto Rico, Inc.**  
Carmen Santiago, Benefits Manager  
P.O. Box 364707  
San Juan, PR 00936

EIN: 66-0256665

A copy of the Plan will be provided to the Secretary of the Department of Labor upon request.

Respectfully submitted,

Richard C. Lodato  
Senior Vice-President, Total Rewards  
Bristol-Myers Squibb Company  
On Behalf of Bristol-Myers Squibb Puerto Rico, Inc.

PS5-37 CjvTe1lo



**Bristol-Myers Squibb**

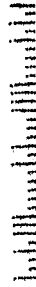
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**RETURN RECEIPT REQUESTED**

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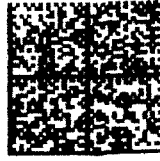


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