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October 11, 2011

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Certified Mail, Return Receipt Requested

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

EBSA/PUBLIC DISCLOSURE
 2011 OCT 17 PM 2:45

**Re: Welborn Baptist Foundation, Inc.
 21 Southeast Third St., Suite 610, Evansville, IN 47708-1418
 EIN: 35-2056722**

Ladies and Gentlemen:

The statement enclosed as Exhibit A constitutes a request to the Department of Labor that the above-named employer be permitted to use the alternative method of compliance with respect to the Welborn Baptist Foundation Deferred Compensation Plan ("Plan"). The Plan, which was adopted on October 1, 2011, effective as of January 1, 2011, is the first "top-hat" plan to be adopted by the Plan sponsor.

Please review and file this statement in accordance with Department of Labor Regulation §2520.104-23. Welborn Baptist Foundation, Inc. will provide a copy of the Plan and any related grants to the Secretary of Labor on request. If you have any questions, please contact the undersigned.

Sincerely,

Alexander L. Mounts

Enclosure

cc: Ronald D. Romain, Chairman
 William R. Neale, Esq.

KD_3564669_1.DOCX

EXHIBIT A**STATEMENT OF ALTERNATIVE METHOD OF FILING
FOR
WELBORN BAPTIST FOUNDATION DEFERRED COMPENSATION PLAN**

1. Employer: Welborn Baptist Foundation, Inc.
2. Address: 21 Southeast Third St., Suite 610
Evansville, IN 47708-1418
3. Employer Identification Number: 35-2056722

DECLARATION

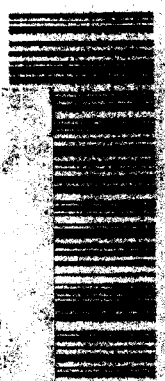
Welborn Baptist Foundation, Inc. (the "Company") declares:

That the Company now maintains one non-qualified, unfunded deferred compensation plan, in the form of a "top hat" deferred compensation plan, primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

That this filing relates to a new unfunded deferred compensation plan sponsored by the Company which was adopted on October 1, 2011, effective as of January 1, 2011.

That there is presently one executive employee who is participating under such plan.

Thank you for using Return Re



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