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October 21, 2011

EBSA/PUBLIC DISCLOSURE
2011 OCT 27 PM 2:50

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

**Top Hat Plan Statement for the
Graphic Packaging International, Inc. Non-Qualified Deferred Compensation Plan**

Dear Sir or Madam:

Graphic Packaging International, Inc. ("Employer") is filing this statement as required by Department of Labor Regulation §2520.104-23. The Employer sponsors the Graphic Packaging International, Inc. Non-Qualified Deferred Compensation Plan ("Plan") as a top-hat plan maintained primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees under sections 201(2), 301(a)(3) and 401(a)(4) of the Employee Retirement Income Security Act of 1974.


The address of the Employer is:
814 Livingston Court
Marietta, GA 30067

The Employer Identification Number ("EIN") assigned by the Internal Revenue Service to the Employer is 84-0772929.

At the present time, it is anticipated that 50 employees will be participating in the Plan in 2012.

Should you have any questions regarding this statement please do not hesitate to contact me at 770.644.3419.

Kind regards,

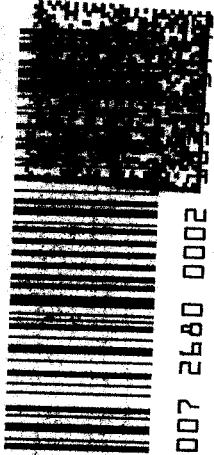

Jennifer L. Lansing-McGrath, PHR, GBA
Manager, Retirement Plans



GRAPHIC PACKAGING
INTERNATIONAL, INC.

GRAPHIC PACKAGING INTERNATIONAL, INC.
814 Livingston Court • Marietta, Georgia 30067

CERTIFIED MAIL



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200 Constitution Ave NW
Washington, DC 20210*

