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*Working with Communities  
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1000 Western Avenue | Fergus Falls, MN 56537 | tel: 218 739 2239 | toll free: 800 735 2239 | fax: 218 739 5381 | www.wcif.org

November 17, 2011

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

EBSA/PUBLIC DISCLOSURE  
2011 NOV 28 AM 10:44

Re: Top Hat Plan Exemption

Dear Secretary,

Pursuant to Department of Labor Regulation Section 2520.104-23(b), I hereby report that the Employer maintains the plan identified below primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The assets of the plan identified below are held by the Employer and are subject to the Employer's general creditors.

Employer Name: West Central Initiative  
Employer Address: 1000 Western Avenue, Fergus Falls, MN 56537  
Employer EIN: 36-3453471  
Number of Plans: One (1)  
Number of Employees in each Plan: One (1)

The Employer will provide plan documents, if any, to the Secretary upon request as required by Section 104(a)(6) of ERISA.

Sincerely,

Sandra King  
Vice President  
West Central Initiative

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 Top Hat Plan Ex. Employee Benefits Sec Adm Rm N-1513  
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 PS Form 3876 August 2003 See Reverse for Instructions

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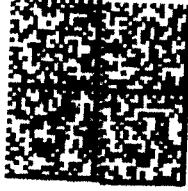


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