

EBSA/PUBLIC DISCLOSURE
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Direct phone: 404.873.8796
Direct fax: 404.873.8797
E-mail: douglas.smith@agg.com
www.agg.com

December 29, 2011

Via Certified Mail — Return Receipt Requested

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

Re: Top-Hat Plan Alternative Reporting and Disclosure Statement for the Sysco Corporation Retiree Equity Deferral Plan

Dear Sir or Madam:

In accordance with Department of Labor Regulation § 2520.104-23 and the Delinquent Filer Voluntary Compliance Program (the “DFVC Program”) adopted by the Department of Labor on March 28, 2002, our client, Sysco Corporation, intends that this letter serve as the disclosure statement that is the alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of the Employee Retirement Income Security Act of 1974, as amended, for the Sysco Corporation Retiree Equity Deferral Plan.

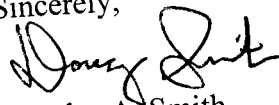
1. The name and address of the employer is Sysco Corporation, 1390 Enclave Parkway, Houston, Texas 77077-2025.
2. The employer identification number assigned by the Internal Revenue Service to the employer is 74-1648137.
3. The employer declares that it maintains the following 3 plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees:
 - a. Sysco Corporation Retiree Equity Deferral Plan. This plan covers 1 employee in the Sysco Corporation controlled group.
 - b. Sysco Corporation Executive Deferred Compensation Plan. This plan covers 127 employees in the Sysco Corporation controlled group.

- c. Sysco Corporation Supplemental Executive Retirement Plan. This plan covers 163 employees in the Sysco Corporation controlled group.

Contemporaneously with the filing of this top-hat plan disclosure statement for the Sysco Corporation Retiree Equity Deferral Plan, Sysco Corporation is submitting to the DFVC Program and paying the applicable penalty amount of \$750.

Please call the undersigned if you have any questions or require additional information.

Sincerely,

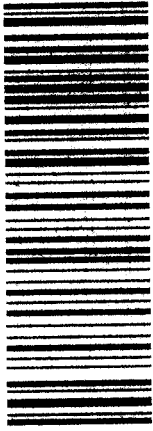

Douglas A. Smith

cc: Ms. Emily B. Sperandio

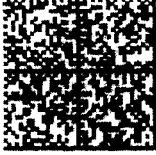
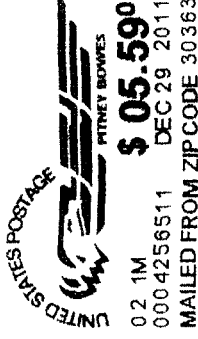
**Arnall
Golden
Gregory LLP**

171 17th Street, NW
Suite 2100
Atlanta, GA 30363-1031

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DAS - 3955.1269

