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ERISA/PUBLIC DISCLOSURE

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November 21, 2011

VIA CERTIFIED MAIL

Secretary of Labor  
Top Hat Plan Exemption  
Pension and Welfare Benefits Administration  
Room N-1513  
U.S. Department of Labor  
200 Constitution Avenue, N.W.  
Washington, D.C. 20210

Re: Blue Diamond Growers Deferred Compensation Plan

Dear Secretary:

Pursuant to Section 2520.104-23 of the Department of Labor's Regulations, this letter will serve as notice that, with respect to the Blue Diamond Growers Deferred Compensation Plan (the "Plan"), the undersigned intends to utilize the alternative form of compliance with the reporting and disclosure requirements of Part 1 of Title I of the Employee Retirement Income Security Act of 1974 ("ERISA") which alternative form of compliance is provided in the aforesaid Regulations Section.

Pursuant to Regulations Section 2520.104-23(b), the following information is provided:

1. Blue Diamond Growers  
1802 C. Street  
Sacramento, CA 95811-1010
2. Employer's Employer Identification Number - 94-0355780

3. The Employer hereby declares that it maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

4. The Employer hereby states that it maintains only the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. The number of employees originally eligible to participate in the Plan will be approximately 20.

Blue Diamond Growers currently maintains the following three (3) additional nonqualified and unfunded Top Hat Plans:

Top Hat Plan #1: A Supplemental Executive Retirement Plan (SERP) for seven (7) participants that was reported and disclosed to the Department of Labor in a filing dated December 11, 1992.

Top Hat Plan #2: A deferred compensation plan for one (1) participant that was reported in a filing dated January 31, 2002.

Top Hat Plan #3: A deferred compensation plan for a select group of management or highly compensated employees that was reported on August 24, 2004. Initially this plan will have one (1) employee/participant.

Pursuant to Regulations Section 2520.104-23(b)(2), the Employer will provide Plan documents, if any, to the Secretary of Labor upon request as required by Section 104(a)(1) of ERISA.

Enclosed is a copy of this letter, which we ask that you date-stamp and return to us in the enclosed self-addressed and stamped envelope.

Very truly yours,

Employer: Blue Diamond Growers

By: Robert S. Donovan

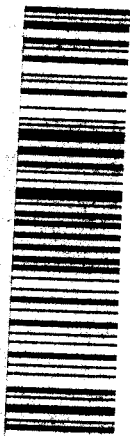
Print Name: Robert S. Donovan

Title: Chief Financial Officer

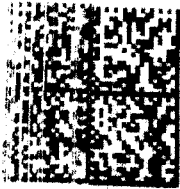


BLUE DIAMOND GROWERS  
P.O. Box 1768, Sacramento, California 95812

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