

January 3, 2012

**Via 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 DC 20210

ES&A/PUBLIC DISCLOSURE  
2012 JAN 11 AM 10:43

Re: Top-Hat Alternative Reporting and Disclosure Statement for Republic National Distributing Company, LLC Deferred Compensation Plan III

Dear Sir or Madam:

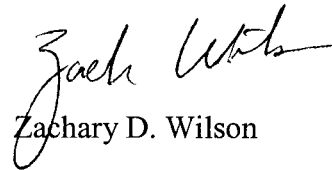
In accordance with Department of Labor Regulation § 2520.104-23, Republic National Distributing Company, LLC intends that this letter serve as the disclosure statement that is the alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of the Employee Retirement Income Security Act of 1974, as amended, for the Republic National Distributing Company, LLC Deferred Compensation Plan III, which was adopted on October 15, 2011.

1. The name and address of the employer is Republic National Distributing Company, LLC, One National Drive SW, P.O. Box 44127, Atlanta, Georgia, 30336-1680.
2. The employer identification number assigned by the Internal Revenue Service to the employer is 20-5543506.
3. The employer declares that it maintains the following 4 plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees:
  - a. Republic National Distributing Company, LLC Deferred Compensation Plan III. This plan covers 270 employees in the Republic National Distributing Company, LLC controlled group.
  - b. Republic National Distributing Company, LLC Executive Deferred Compensation Plan II. This plan covers 28 employees in the Republic National Distributing Company, LLC controlled group.

- c. Republic National Distributing Company, LLC Deferred Compensation Plan. This plan covers 4 employees in the Republic National Distributing Company, LLC controlled group.
- d. Kronheim Deferred Compensation Plan. This plan covers 4 employees in the National Distributing Company, Inc. controlled group.

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

Sincerely,



Zachary D. Wilson

cc: Ms. Francie Purnell

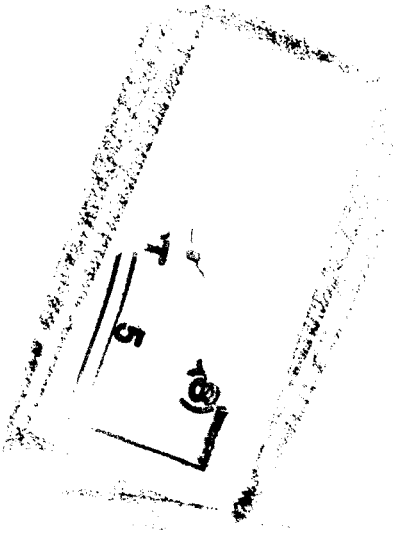
**CERTIFIED MAIL**



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Gregory LLP**  
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Atlanta, GA 30363-1031

Zachary D. Wilson, Esq.



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