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August 8, 2012

**CERTIFIED MAIL****RETURN RECEIPT REQUESTED**EUSA/PUB/10/11/12  
2012 AUG 14 PM 2:44

U.S. Department of Labor  
Employee Benefits Security Admin.  
Top Hat Plan Exemption  
200 Constitution Ave., NW, N-1513  
Washington D.C.

Re: Keiter, Stephens, Hurst, Gary & Shreaves ("Keiter"); DFVC Program Filing

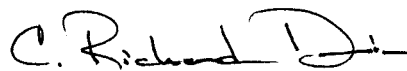
Dear Sir or Madam:

Please find enclosed the Section 2520.104-23 Top Hat Plan Statement filed on behalf of Keiter, Stephens, Hurst, Gary & Shreaves, P.C., a Virginia professional corporation. A noted in the Statement, a contemporaneous filing with required attachments is being filed with the DFVCP office in Philadelphia.

Please give me a call with any questions you may have or if you wish to have any additional information. My direct dial number is (804) 915-7030.

Thank you for your assistance in this matter.

Very truly yours,



C. Richard Davis

Enclosures

cc: Lewis O. Hall, C.P.A.  
Deborah Ramsey, Director of Administration

August 6, 2012

**CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

Top Hat Plan Exemption  
EBSA Administration  
Room N-1513  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, D.C. 20210

Re: Keiter, Stephens, Hurst, Gary & Shreaves ("Keiter")  
Submission of Section 2520.104-23 Top Hat Statement

Dear Sir or Madam:

This correspondence is submitted to effect compliance with Section 2520-104-23 as it relates to qualification for the alternate reporting and disclosure requirements applicable to "top-hat" plans. Given the December 31, 2002 effective date of the plan identified, this correspondence is submitted in conjunction with a DFVC Program filing being sent contemporaneously to the Department of Labor at the Philadelphia, Pennsylvania address specified in the DFVC FAQs appearing 08/01/12 on the EBSA website.

Keiter, a Virginia professional corporation, maintains a non-qualified deferred compensation plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees. This plan along with its requisite data is:

Name of Employer:	Keiter, Stephens, Hurst, Gary & Shreaves, a Professional Corporation ("Keiter")
Address of Employer:	4401 Dominion Boulevard, 2nd Floor Glen Allen, Virginia 23060
Employer's IRS EIN:	54-1631262

Keiter, Stephens, Hurst, Gary & Shreaves, P.A.  
A PROFESSIONAL CORPORATION

Mailing Address:  
P.O. Box 32066  
Richmond, VA 23234

4401 Dominion Boulevard  
2nd Floor  
Glen Allen, VA 23060  
Tel: 804-747-0000  
Fax: 804-747-3652

Web: [www.keitercpa.com](http://www.keitercpa.com)

Name of Plan: Retirement Obligation Plan  
Effective Date: December 31, 2002



Number of Current Plan  
Participants: 16


In accordance with ERISA Section 104(a)(6), Keiter will upon request provide plan documents to the Secretary.

Please call me with any questions you may have regarding this Section 2520-104-23 statement.

Very truly yours,

A handwritten signature in black ink that appears to read "L. Hall".

Lewis O. Hall, CPA  
President

 Certified Public  
Accountants & Consultants

Mailing Address:  
P.O. Box 32066  
Richmond, VA 23294

4401 Dominion Boulevard  
2nd Floor  
Glen Allen, VA 23060  
Tel: 804.747.0000  
Fax: 804.747.3632

Web: [www.keitercpa.com](http://www.keitercpa.com)

