

KAUFMAN & CANOLES

2520032900574

A PROFESSIONAL CORPORATION
ATTORNEYS AND COUNSELORS AT LAW

700 PAVILION CENTER
POST OFFICE BOX 626
VIRGINIA BEACH, VIRGINIA 23451

ONE COMMERCIAL PLACE
POST OFFICE BOX 3037
NORFOLK, VIRGINIA 23514
(804) 624-3000
FAX (804) 624-3169
ABANet KAUFMAN.C
TELEX 82-5431

11832 ROCK LANDING DRIVE
SUITE 101
NEWPORT NEWS, VIRGINIA 23606

—————
DIRECT DIAL NUMBER
624-3285

May 27, 1992

Office of Employee Benefits Security
Labor-Management Services Administration
U.S. Department of Labor
Washington, D.C. 20216

**Re: Old Dominion Tobacco Company, Incorporated
Deferred Compensation Plan
Our Matter No. 0034242**

To the Secretary of Labor:

In order to comply with the requirements of the alternative reporting and disclosure method under ERISA, Title 1, Part 1, as provided for an unfunded or insured deferred compensation plan for a select group of management or highly compensated employees in D.O.L. Regulations ¶ 2520.104-23, the following information is provided by the undersigned Plan Administrator:

1. The name of the employer is: Old Dominion Tobacco Company, Incorporated.
2. The mailing address of the employer is:

5400 Virginia Beach Boulevard
Virginia Beach, VA 23462
3. The employer's federal identification number (EIN) is: 54-0325210.
4. The number of plans and the number of participants in each plan is:

Three (3) plans, each covering one (1) employee.

Office of Employee Benefits Security
U.S. Department of Labor
May 27, 1992
Page 2

The above-named employer maintains this plan primarily for the purpose of providing deferred compensation benefits to a select group of management or highly compensated employees.

The employer will send a copy of all Plan documents and agreements to the Secretary, upon request.

OLD DOMINION TOBACCO COMPANY,
INCORPORATED

By: Richard C Mapp, III
Richard C. Mapp, III,
Attorney-in-Fact for
Plan Administrator

RCM/cmw

cc: Ms. Robin D. Ray,
Old Dominion Tobacco Company, Inc.