

THE OLD MOUNTAIN COMPANY, INC.

333 WEST WACKER DRIVE
CHICAGO, ILLINOIS 60606

RONALD J. SPIOTTA
VICE PRESIDENT AND CONTROLLER

(312) 917-1855

October 12, 1992

Top Hat Plan Exemption
Pension and Welfare
Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210

2520032904262

Re: Reporting and Disclosure Statement
DRC-TH#92-0446

Dear Sir:

In accordance with Department of Labor Regulation 29 CFR Section 2520.104-23 that provides an alternative method of compliance with the reporting and disclosure requirements of Part 1 of Title I of the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), for unfunded pension plans maintained by an employer for a select group of management or highly compensated employees, The Old Mountain Company, Inc., as employer and plan administrator, hereby files this statement containing the following information:

1. Name and address of employer: The Old Mountain Company, Inc.
333 West Wacker Drive
Chicago, Illinois 60606
2. Employer identification number (EIN) assigned to the employer by the Internal Revenue Service: 36-3144022
3. The employer maintains a plan or plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.
4. The number of such plans maintained by the employer is two. The number of employees in the first plan is seven and the number of employees in the second plan is three.

THE OLD MOUNTAIN COMPANY, INC.

By: 

Ronald J. Spiotta
Vice President and Controller

RJS:cs

THE OLD MOUNTAIN COMPANY, INC.

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P.O. Box 75212
Washington, D.C. 20013-5212

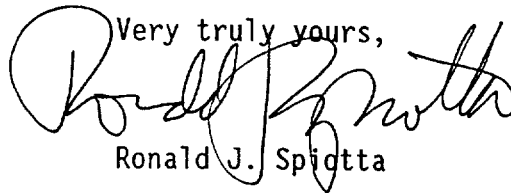
Re: The Old Mountain Company, Inc.
Employer Identification Number: 36-3144022
DRC-TH#92-0446

Gentlemen:

On behalf of The Old Mountain Company, Inc., enclosed is the top-hat disclosure statement described in 29 CFR Section 2520.104-23 (with an original signature) with respect to certain top-hat plans maintained by The Old Mountain Company, Inc. An original of the enclosed statement is being filed concurrently with the Top Hat Plan Exemption Division of the U.S. Department of Labor Pension and Welfare Benefits Administration. The enclosed statement is filed with your office in accordance with the Notices issued by the Department of Labor on April 20, 1992 (57 FR 14436), July 24, 1992 (57 FR 33019) and September 21, 1992 relating to the Department of Labor's civil penalty program.

Pursuant to the July 24, 1992 Notice, enclosed is a check in the amount of \$1,000 in payment of the civil penalty with respect to all of the top-hat plans covered by the enclosed statement. If you have any questions or comments regarding the enclosed, please call.

Very truly yours,



Ronald J. Spiotta

RJS:cs

Enclosures

✓ cc: Top Hat Plan Exemption
Pension and Welfare
Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, N.W.
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