



USA Life One *Insurance Company of Indiana*

"Insuring your interest since 1894"
DONALD D. PFAHLER, CPA
*Vice President, Controller,
Secretary & Treasurer*

February 9, 1994

2520040150774

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

RE: USA Life One Deferred Compensation Plan

FEB 18 1994
U.S. DEPARTMENT OF LABOR

Gentlemen or Ladies:

In accordance with Department of Labor Regulation Sec. 2520.104-23, USA Life One Insurance Company of Indiana, located at 227 East Main Street, P. O. Box 312, Crawfordsville, Indiana 47933, and assigned EIN 35-0173208 by the Internal Revenue Service hereby declares that it maintains one plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees which provides that benefits shall be paid solely from the general assets of the Employer. The number of employees covered under the above named plan is seven.

The filing of this statement is intended solely to comply with Reg. Sec. 2520.104-23 to the extent it applies, and may not, by itself, be treated as an admission by USA Life One Insurance Company of Indiana that the arrangements described herein are "employee pension benefit plans" subject to the Employee Retirement Income Security Act of 1974, as amended.

Respectfully submitted,

Donald D. Pfahler
Vice President and
Chief Operating Officer

DDP/jlh
Certified Mail