

January 20, 2004

TO: Secretary of Labor
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

In compliance with the requirements of the alternative method of reporting and disclosure under Part I of Title I of the Employee Retirement Income Security Act of 1974 for unfunded or insured pension plans for a select group of management or highly compensated employees, specified in Department of Labor Regulations, 29 C.F.R. Sec. 2520.104-23, the following information is provided by the undersigned employer.

Name and Address of Employer: Del Papa Distributing Co., L.P.

6702 Broadway

Galveston, TX 77554

Employer Identification Number: 74-1498115


Del Papa Distributing Co., L.P. maintains a plan primarily for the purpose of providing deferred compensation for the following select group of management or highly compensated employees.

List of Employees:

Randal Andreasen
Bill Falkenhagen
Alex Guidroz
Manuel Ortega
Brad Wolfe

Dan Dickson
Mike Ferlet
Mike Menard
Peter Williamson

Effective Date January 20, 2004

By 
Dennis R. Bettison, General Counsel for Del Papa
Distributing Co., L P.

BETTISON, DOYLE
APFFEL & GUARINO, P.C.
ATTORNEYS COUNSELLORS AT LAW

DENNIS R. BETTISON
* Estate Planning
& Probate Law

PATRICK F. DOYLE

Galveston Island Professional Center
6710 Stewart Road • Suite 300 • Galveston, Texas 77551
Galveston 409-744-9783 • Texas City 409-945-9551 • Fax 409-744-9786
Website: www.bdaglaw.com

* CERTIFIED BY THE TEXAS BOARD OF LEGAL SPECIALIZATION IN THE LISTED AREA OF SPECIALIZATION
NOT CERTIFIED BY THE TEXAS BOARD OF LEGAL SPECIALIZATION UNLESS OTHERWISE NOTED

DARRELL A. APFFEL
Mediator

MICHAEL J. GUARINO
* Former Galveston County
District Attorney

February 25, 2004

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

Re: **Del Papa Distributing Co., L. P.**

Dear Sir or Madam:

Please find a notification letter for a deferred compensation plan implemented by
Del Papa Distributing Co., L. P.

Should you need any additional information, please advise.

Very truly yours,



Dennis R. Bettison

DRB/jsh
Enclosure

BETTISON, DOYLE
APFFEL GUARINO, P.C.
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