

MARTHA ANN WALLS
PRESIDENT

2520040184497

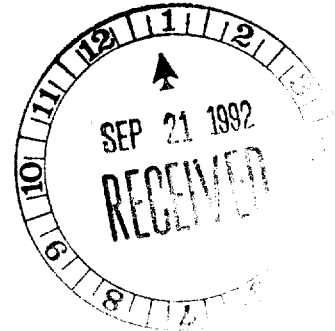
SOUTHERN NEWSPAPERS, INC.

1050 WILCREST DRIVE
HOUSTON, TEXAS 77042
(713) 266-5481

CERTIFIED MAIL NO. P 396 670 546
RETURN RECEIPT REQUESTED

September 14, 1992

Pension and Welfare Benefits Administration
U.S. Department of Labor
P.O. Box 75212
Washington, D.C. 20013-5212

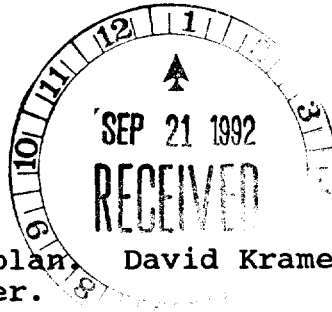


Dear Sir or Madam:

NE 2822

In accordance with the Department of Labor Regulation 2520.104-23 and the guidance published in 57 Fed. Reg. 33019-21 (July 24, 1992), this letter will serve as the alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of the Employee Retirement Income Security Act of 1974, as amended, for the pension plans described below for a select group of management or highly compensated employees.

1. The name and address of the employer is Southern Newspapers, Inc., 1050 Wilcrest, Houston, Texas 77042.
2. The employer identification number assigned by the Internal Revenue Service to the employer is 74-1674526.
3. The employer declares that it maintains the following plans primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees:
 - a. Southern Newspapers, Inc. Deferred Compensation Plan. There are six active employees participating in this plan.
 - b. Southern Newspapers, Inc. Top Hat Pension Plan. There are four active employees participating in this plan.
 - c. Deferred Compensation Contract between Nanelle Mallory and the employer. There are no active employees participating in this plan. Nanelle Mallory is a former employee of the employer.
 - d. Deferred Compensation Contract between Fred Hornberger and the employer. There are no active employees participating in this plan. Fred Hornberger is a former employee of the employer.
 - e. Covenant not to compete agreement between David Kramer and the employer. There are no active employees



participating in this plan. David Kramer is a former employee of the employer.

f. Covenant not to compete agreement between B.L. Brown III and the employer. There is one active employee participating in this plan.

g. Covenant not to compete agreement between Bruce Morisse and the employer. There is one active employee participating in this plan.

h. Covenant not to compete agreement between Michael Graxiola and the employer dated April 1, 1985. There is one active employee participating in this plan.

i. Covenant not to compete agreement between Billy J. Cornwell and the employer. There is one active employee participating in this plan.

j. Covenant not to compete agreement between Michael Graxiola and the employer dated January 1, 1990. There is one active employee participating in this plan.

k. Covenant not to compete agreement between Ron Filkins and the employer. There is one active employee participating in this plan.

l. Covenant not to compete agreement between Gary Dobbs and the employer. There is one active employee participating in this plan.

m. Covenant not to compete agreement between Janis Davis and the employer. There is one active employee participating in this plan.

n. Covenant not to compete agreement between David Sullens and the employer. There is one active employee participating in this plan.

o. Deferred Compensation Agreement between Gerald Hoke and the employer. There is one active employee participating in this plan.

p. Deferred Compensation Agreement between Nancie Brockway and the employer. There is one active employee participating in this plan.

q. Deferred Compensation Agreement between B.L. Brown III and the employer. There is one active employee participating in this plan.

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r. Deferred Compensation Agreement between Don Avery and the employer. There is one active employee participating in this plan.

4. A check for \$1,000 payable to "U.S. Department of Labor" is enclosed.

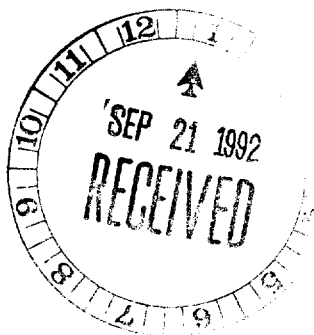
Very truly yours,



Martha Ann Walls
President

MAW/daw

Enclosure





SOUTHERN NEWSPAPERS, INC.
P.O. BOX 42828
Houston, Texas 77242
(713) 266-4112

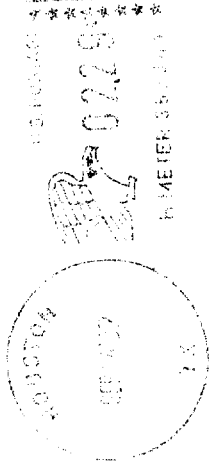
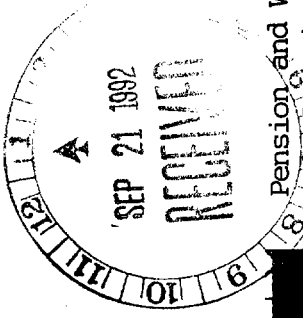
V# 41275

CONTROL NO.

REFERENCE	INVOICE NO.	INVOICE DATE	INVOICE AMOUNT	DISCOUNT	AMOUNT PAID	P.O. #
	9-11-92	9-11-92			1,000.00	

NE 2822

SOUTHERN NEWSPAPERS, INC.
1050 WILCREST DRIVE
HOUSTON, TEXAS 77042



Pension and Welfare Benefits Administration
U.S. Department of Labor
P O Box 75212
Washington, DC 20013-5212

*Fold at line over top of envelope to the right
of the return address*

CERTIFIED

P 396 670 546

MAIL

