

ALTERNATIVE REPORTING AND DISCLOSURE STATEMENT  
FOR NON-QUALIFIED DEFERRED COMPENSATION PLANS FOR A  
SELECT GROUP OF MANAGEMENT OR HIGHLY COMPENSATED EMPLOYEES

To the Secretary of Labor:

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. §2520.104-23, the following information is provided by the undersigned employer. Copies of plan documents will be made available to the Department of Labor upon request.

Name and address of employer: W.C. Douglas & Associates, Inc.  
5050 Poplar, Suite 918  
Memphis, Tennessee 38157

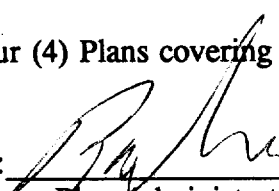
Employer Identification Number: 62-0455860

W.C. Douglas & Associates, Inc. maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

Number of Plans and Participants in  
Each Plan:

Four (4) Plans covering one (1) employee each

Dated: 12-29-92

By:   
Plan Administrator

29267



*W. C. Douglas  
& Associates, Inc.*  
*Insurance & Bonds*

5050 POPLAR AVENUE  
MEMPHIS, TENNESSEE 38157  
(901) 767-3083

December 29, 1992

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

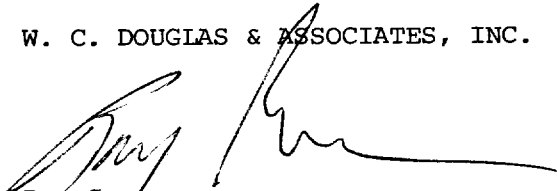
Re: W. C. Douglas & Associates, Inc.  
EIN 62-0455860

Dear Sir or Madam:

The enclosed disclosure statement is being filed pursuant to the Department of Labor's amnesty program for certain unfunded "top-hat" pension plans. Enclosed is our check for \$1,000. in full payment of the designated penalty amount.

Very truly yours,

W. C. DOUGLAS & ASSOCIATES, INC.

  
Ray Greer  
President

RG/sb

Enclosures

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**W. C. Douglas  
& Associates, Inc.**  
*Insurance & Bonds*

5050 POPLAR AVENUE  
MEMPHIS, TENNESSEE 38157



**CERTIFIED**  
P 101 230 371  
**MAIL**



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Pension and Welfare Benefits Administration  
P. O. Box 75212  
Washington, D.C. 20013-5212

