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**BURTON & SCHMITS**

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September 28, 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

RE: Police and Firemen's Insurance Association  
Deferred Compensation Plan for Executive Officers

To Whom It May Concern:

Pursuant to Department of Labor Regs. Sec. 2520.104-23, Police and Firemen's Insurance Association ("PFIA"), as the sponsor and administrator of the top hat plan captioned above, hereby files the following statement in fulfillment of the reporting obligation imposed by ERISA Sec. 104:

1. Name and Address of Employer:

Police and Firemen's Insurance Association  
3550 North Washington Boulevard  
Indianapolis, Indiana 46205

2. EIN: 35-0586820

3. Declaration: PFIA maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees.

4. Statement of Number of such Plans: one

5. Number of Employees in the Plan: 5

If further information or documentation is needed please contact the undersigned attorney for PFIA.

Sincerely,

BURTON & SCHMITS

By   
Lawrence W. Schmits

LWS/js  
cc: Jeffrey E. Wellner

SEP 29 1992