

DENNIS, SHAW & FORD, LLC
ATTORNEYS AT LAW
103 LAFAYETTE STREET
REPLY TO: POST OFFICE BOX 891
SPARTANBURG, S.C. 29304-0891

2520052092439

R. RAY DENNIS*
JAMES W. SHAW, P.A.
STEVEN B. FORD†, P.A.
ANTHONY H. RANDALL**

August 18, 1999

(864) 582-0708
FAX (864) 582-0934

*ALSO ADMITTED IN MASSACHUSETTS
†CERTIFIED SPECIALIST IN TAXATION LAW
**ALSO ADMITTED IN NORTH CAROLINA

Office of Pension and Welfare Programs
Labor Management - Services Administration
U.S. Department of Labor
Washington, D.C. 20216

Re: The Capital Corporation
EIN: 57-0938473

Dear Sir or Madam:

Please find enclosed the ERISA Memorandum Statement relating to The Capital Corporation, Inc. If you have any further questions please let me know.

Very Truly Yours,

DENNIS, SHAW & FORD, LLC



Steven B. Ford

SALARY CONTINUATION PLAN FOR
THE CAPITAL CORPORATION, INC.
ERISA MEMORANDUM STATEMENT

DATE: August 17, 1999

TO: Office of Pension and Welfare Programs
Labor Management - Services Administration
U.S. Department of Labor
Washington, D.C. 20216

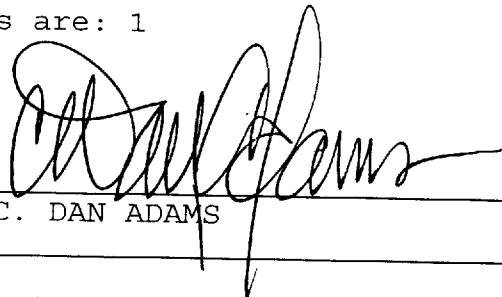
FROM: The Capital Corporation, Inc.
EIN: 57-0938473
809 East Main Street
Spartanburg, SC 29302

This statement is with respect to Non-Qualified Deferred Compensation Plans maintained by Employers under the requirements of 29 CFR Section 2520.104-23(a).

Employer currently maintains one non-qualified salary continuation plan for Executives who are members of a "select group of management" or who are "highly compensated".

The number of participants are: 1

Plan Administrator: _____


C. DAN ADAMS

Title: President

Employer: The Capital Corporation, Inc.

DENNIS, SHAW & FORD, LLC
ATTORNEYS AT LAW
POST OFFICE BOX 891
SPARTANBURG, SC 29304-0891

Of Pension and Welfare Programs
Labor Management - Services Administration
U.S. Department of Labor
Washington, D.C. 20216

