

5/21/42

To : Members of the Informal Committee
on Capital Controls

Re : Report of Meeting held by the
Committee on May 12, 1942

From: Securities and Exchange Commission

The conference was called in the Office of the Secretary of the Treasury at 11:00 a.m., May 12, 1942. Present were: Secretary Morgenthau, Harriner S. Eccles, Chairman Board of Governors of Federal Reserve Board, Lauchlin Currie, Administrative Assistant to the President, George Buffington, Jr., Assistant to the Secretary of the Treasury, Commissioner Robert E. Healy, Chairman Purcell, and Edw. T. McCormick of the Securities and Exchange Commission.

The meeting was called pursuant to understanding of April 28, 1942, for the purpose of reviewing the nature and purpose of certain proposed offerings of securities. It was the intent of the committee to review the private financing field in order to ascertain whether or not any of the current financing interfered or might interfere with Treasury financing to the extent that warranted prohibition of such financing. At the outset Mr. Purcell pointed out to the committee that an estimated 100 investment trust organizations were actively engaged in the sale of investment trust certificates or plans in direct competition with the Treasury's program of selling war savings bonds to individuals. It was pointed out that while the sales figures for 1941 were not available, that in recent years sales by these trusts had amounted to from \$50 to \$100 million a year. Messrs. Purcell and Healy pointed out that as a matter of fact persons who invested in this type of security uniformly realized less income than persons who invested in United States Government Savings Bonds. The Securities and Exchange Commission was requested to present as soon as possible current statistics relating to the activities of this type of institution. It was unanimously agreed by the

committee that steps should be taken to prohibit the further sale of certificates by investment companies of this type should the data submitted bear out the conclusions reached at the meeting. It was felt, in that event, that steps should be taken to stop further sales and if it should be found impossible to stop such sales on demand, it would be advisable to obtain the necessary implementing authority through legislation or executive order.

The Securities and Exchange Commission was asked, at the suggestion of Mr. Eccles, to obtain an analysis of building and loan association operations, particularly total assets, nature of portfolio, amount of deposits and income, together with the recent trends in these items. It was also suggested that in connection with this analysis a report be presented on the activities of the Federal Savings and Loan Insurance Corporation.

Mr. Purcell next called attention to three relatively small proposed offerings by American and Canadian mining companies. He emphasized that while individually the items appeared insignificant that financing of gold mining enterprises was entirely unwarranted and that steps should be taken to terminate such offerings. In the matter of the Despina Gold Mines, Ltd., a Canadian corporation, the Secretary of the Treasury stated that he would have his Department communicate directly with the Canadian Treasury with a view to stopping financing by such ventures in the United States. In the matter of the Treasure Mountain Gold Mining Company and the Gillham Mining Company, American corporations, the Securities and Exchange Commission was directed to take steps on behalf of the committee to suspend their financing programs.

The committee next considered the proposed offering of the National Distillers Products Corporation. This company proposed to offer on May 13, 1942, \$15,000,000 of Debentures for the purpose of repaying \$11,000,000 of outstanding bank loans and increasing general funds available for the increase of inventories by \$4,000,000. The committee determined

to raise no objection to this offering with the understanding that such action in no way constituted a precedent to be followed in like cases in the future. Mr. Currie emphasized the fact that this type of offering involved a matter vitally affecting the national interest and that further study should be made of offerings designed to finance increased inventories of materials not essential to the war effort. He pointed out that the result of the two transactions, that is, the borrowing from banks to increase inventories and then appealing to the public for funds to repay bank loans had the same net effect as a direct sale to the public for the purposes of increasing inventories. The Securities and Exchange Commission was directed to contact the War Production Board and the Office of Price Administration for the purpose of determining their attitude toward financing of this type.

Mr. Currie also suggested that a study be undertaken to ascertain the economic effects of prohibiting financing undertaken for the purpose of permitting the processing of agricultural commodities, such as tobacco, grain, etc. The Commission is going forward with this project.

The financing of Philip Morris and Company, a cigarette manufacturer, was considered next. The nature and purpose of this financing was almost identical to that of the National Distillers Corporation and here again the committee raised no objection to the offering pending further consideration of the general problems involved. A final decision on financing for inventory accumulation of non-war items will probably be made in connection with offerings for financings proposed by R. H. Macy and Company and Federated Department Stores which have been mentioned in the Financial Press but had not yet been filed with the Securities and Exchange Commission. R. H. Macy has since, on May 14, 1942, filed a registration statement under the Securities Act of 1933.

The Public Service Company of Indiana offering, a plant expansion project for war purposes, was approved, as well as the offering of Virginia Public Service Company, which is in part also a refunding proposition.

In the case of the Interim Finance Corporation the committee requested the preparation of a detailed memorandum setting forth the nature of the business contemplated by this company and such information as can be obtained relative to the reputation and experience of the promoters of the company. The general feeling was that such financing as this should be prohibited at this time.

Mr. Purcell read to the committee a list of the financings now in process of examination by the Securities and Exchange Commission and those which have been noted in the Financial Press but which have not yet been filed with the Securities and Exchange Commission. He stated that the individual cases would be presented to the committee prior to their clearance by the Securities and Exchange Commission. In this connection he also pointed out that certain types of financing, e.g., municipal offerings or private placements would not come within the jurisdiction of the Securities and Exchange Commission and would require regulation to the same extent as public offerings coming before the Securities and Exchange Commission.

It was pointed out by Mr. Purcell that the securities market could be seriously impaired by a single issue of the type made recently by the American Tobacco Company in the event that its reception was not good and it persisted in hanging over the market in the hands of underwriters, dealers, and others.

Edward T. McCormick
Assistant Director
Registration Division

Received in
Office of
May 21, 1942

YAN SS YAM

Board of Governors
of the
Federal Reserve Bank of St. Louis

6/3/42

MEMORANDUM

To : Members of Informal Capital Control
Committee

Subject : Sales of Investment Trust Securities

From : The Securities and Exchange Commission

The committee at its meeting of May 12 requested that the Securities and Exchange Commission make an examination to ascertain the extent to which the sale of certificates of investment companies might interfere with the Treasury's bond selling program. There are at present 108 investment companies actively engaged in the sale of certificates. In addition, there are 46 face amount and periodic payment companies which are collecting periodic payments on outstanding contracts although they are no longer selling new contracts.

The most common type of investment trust actively selling is the open-end diversified management company. Trusts of this type are not limited by their indentures in the amount of certificates which they may sell and all proceeds are invested in securities which the management selects from certain broad categories specified in their trust indentures. The management is therefore quite free to invest the money as its judgment dictates. There are 75 companies of this type now selling. Five unit type trusts are also in the field at this time. The composition of the portfolio of unit trusts is fixed and no discretion is left to the management in the selection of investments. Four investment companies, known as non-diversified trusts, are now selling. In these cases the selection of securities by the management is limited to a particular industry or group, e.g., aeronautical, railroad, or utility securities. Twenty-one companies are now distributing what are known as

periodic payment plans. These companies sell contracts which provide for regular periodic payments by investors. As each payment is received it is invested in securities and the investor is credited with a certain number of "units". The number of underlying units which he receives depends upon the market value of the underlying portfolio at the time of payment. The value of his investment fluctuates with the market value of the underlying portfolio securities represented by the units with which he has been credited. Three companies, including Investors Syndicate of America, Inc., one of the largest investment companies in the country, are selling face amount certificates. The security involved here requires periodic payments on the part of the investor and the amount which he can realize on withdrawal is established by a schedule of cash surrender values specified in the contract. There are thirty-five periodic payment companies and 11 face amount companies now collecting on outstanding contracts but no longer actively selling new contracts to investors. For a complete list of the names of the 154 trusts described above, see the attached Schedule I. 1/

An analysis of reports filed with the Investment Trust Division of the Securities and Exchange Commission by open-end investment companies shows that new certificates in the amount of in excess of \$53,000,000 were sold during the fiscal year ending in 1941. 2/ Of the three face amount

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- 1/ No reference is made herein to the numerous investment trusts which are receiving no money from investors either on new certificates or outstanding certificates as they apparently interfere in no way with the Government's selling program.
- 2/ Approximately one-half of these companies have fiscal years ending on December 31, while the balance have fiscal years ending at various dates throughout the year.

companies now actively selling the Investors Syndicate of America sold between January 6, 1941, and December 31, 1941, certificates having a face amount of \$70,830,000 and received payments thereon approximating \$5,415,630. This company was organized late in 1940 to succeed to the selling program of Investors Syndicate, which company had been in operation for many years but had encountered difficulties in complying with the requirements of the Investment Company Act of 1940 and the Securities Act of 1933. It is now selling each month certificates calling for payments of between seven and eight million dollars over the lives of such certificates. The other two face amount companies now selling new contracts, the American Annuity Savings Association of Lansing, Michigan, and State Bond and Mortgage Company of New Ulm, Minnesota, sold certificates in 1941 having a face amount of approximately two and a quarter million dollars. The types of contracts sold by plan and face amount companies are particularly significant as they "tie-up" the purchasers for long periods of time extending to as much as 15 years and thus reduce their ability to purchase Government bonds. Adequate statistics regarding the activities of the other face amount and plan companies are not now available but the Securities and Exchange Commission is presently canvassing all of these companies for the purpose of determining the amount of sales made in 1941 and the amount of collections received on all outstanding contracts in 1941. This information should be available within a short time.

The records of the Securities and Exchange Commission disclose that investors would fare much better if they purchased United States Government War Bonds in place of certificates of investment companies. A substantial part of each dollar of the investor's principal payment and income is taken by the sponsor, depositor, and management companies. The original sales load generally amounts to about 6%, the management fee runs as high as 1½% of the principal invested,

and the withdrawal fee frequently amounts to 1% of the withdrawal value. The very fact that certificates of this character can be sold establishes that the competition suffered by the Treasury from offerings of investment certificates is "unfair". Investment trust certificates are generally sold under conditions conducive to the use of high-pressure methods. These companies employ large groups of skilled and sometimes unscrupulous salesmen. These men cover wide territories and are assisted by expensive and frequently nationwide advertising campaigns. The principal selling point is "safety" through diversification and sound management and the promise of higher income than is obtainable from generally recognized conservative investments. Much of the business done by these companies is effected with persons who can little afford to lose their small investment funds and who are most easily influenced by high-pressure tactics, e.g., women, school teachers, workers and professional people having no investment experience, etc. These are the very people who should and would now be buying war bonds. The questionable character of the selling methods frequently used by these companies is indicated by the fact that the Commission has conducted 54 investigations and hearings under Section 8 ("stop order" provisions) of the Securities Act against investment companies. In these cases 16 companies were ordered to suspend sales, 11 voluntarily suspended sales, and 27 revised their selling literature to meet the Commission's objections. (See Exhibit II attached). In addition, the Commission has had 11 investment companies enjoined through court action from the use of misleading sales material. (See Exhibit III attached).

As an example of the activities of these companies, one can cite the record of Investors Syndicate and its newly organized subsidiary, Investors Syndicate of America. These companies operate the largest face amount contract distribution organization in the country. As of January 1, 1941, the companies' personnel numbered 2,850, of whom

479 were employed in the home office, 230 in various branch offices, and 2,150 consisted of members of the selling agency organization. These salesmen are scattered throughout 42 States and the District of Columbia. At January 1, 1941, the company had outstanding and in force 417,616 contracts, having an aggregate face amount of in excess of \$1,000,000,000, in the hands of 350,000 individuals. As was stated by the Commission in its investment trust study report on Investors Syndicate, its salesmen use extravagant and frequently questionable methods. The salesmen employ a door-to-door method and are equipped with various tables and combinations of figures incorporated in mechanical gadgets to be used to bedazzle prospects with the alleged possibilities of the plan of investment offered. While use of misleading sales tactics is heightened in the case of Investors Syndicate of America the employing of these practices is common to the field of investment company securities distribution.

While the amount of sales actually made by investment companies is now substantial, their sales may prove even a more serious obstacle to the Treasury at such time as greater confidence in the securities market returns. At that time they will be in a better position to "out-sell" the Treasury Department. It is important to note that while 108 investment companies are now actively selling certificates there are about 400 investment organizations in existence, most of which could swing into sales campaigns in a relatively short time. In addition, many new companies will undoubtedly be formed as soon as the securities market improves appreciably. As an indication of the number of such organizations which is likely to be formed, attention is called to the fact that 1300 investment companies of this type were organized within the last 15 years in this country.

This information relating to the sales activities of investment companies is submitted for the consideration of the committee.

Edw. T. McCormick
Assistant Director
Registration Division

June 3, 1942

INVESTMENT COMPANIES PRESENTLY EFFECTIVELY REGISTERED UNDER THE SECURITIES ACT OF 1933

TABLE A

<u>Trust</u>	<u>Address</u>	<u>Investment Co. File No. 811-</u>	<u>Codes</u>	<u>Securities Act File No. 2-</u>	<u>Sponsor</u>
Aeronautical Securities, Inc.	Jersey City, N. J.	183	M-O-N	3690	
Alleghany Corporation	Wilmington, Del.	338	M-O-N	4667	
American Foreign Investing Corp.	New York, N. Y.	334	M-O-D	3604	
Affiliated Fund	Jersey City, N. J.	5	M-O-D	4177	
American Business Shares	Jersey City, N. J.	3	M-O-D	3662	
Aviation Capital, Inc.	New York, N. Y.	226	M-O-D	4172	
Axe Boughton Fund, Inc.	Jersey City, N. J.	281	M-O-D	1903	
Axe Boughton Fund B, Inc.	Jersey City, N. J.	273	M-O-D	3777	
Bullock Fund Ltd.	Jersey City, N. J.	154	M-O-D	64	
Boston Fund, Inc.	Boston, Mass.	8	M-O-D	3935	
Broad Street Investing Corp.	New York, N. Y.	234	M-O-D	1906	
Composite Bond Fund, Inc.	Spokane, Wash.	123	M-O-D	4625	
Century Shares Trust	Boston, Mass.	19	M-O-D	4628	
Chemical Fund, Inc.	Jersey City, N. J.	204	M-O-D	4557	
Commodity Corporation	Boston, Mass.	449	M-O-N	1326	
Commonwealth Fund Plans C & D	Boston, Mass.	71	M-O-D	4644	Trust Funds, Inc.
Commonwealth Investment Company	San Francisco, Calif.	66	M-O-D	1789	
Delaware Fund	Wilmington, Del.	249	M-O-D	3628	
Dividend Shares, Inc.	Jersey City, N. J.	126	M-O-D	3688	
Diversified Trustee Series B	Jersey City, N. J.	73	U-A	3659	American Trustee Share Corp.
Dodge, & Cox Fund	San Francisco, Calif.	173	M-O-D	4691	
Dow Theory Fund	Denver, Col.	143	M-O-D	4435	Colorado Sponsors, Inc.
Equitable Investment Corp. of Mass.	Boston, Mass.	163	M-O-D	1488	
Equity Fund, Inc.	Seattle, Wash.	278	M-O-D	428	
Eaton & Howard Balanced Fund	Boston, Mass.	160	M-O-D	4860	
Eaton & Howard Stock Fund	Boston, Mass.	161	M-O-D	2677	
First Mutual Trust Fund	New York, N. Y.	130	M-O-D	4690	National Securities & Research Corp.
Fidelity Fund, Inc.	Boston, Mass.	215	M-O-D	3629	
Fundamental Trust Shares Series A	Santa Monica, Calif.	119	U-A	12	Fundamental Group Corp.
Financial Industrial Fund, Inc.	Denver, Col.	352	M-O-D	3603	
Fundamental Investors, Inc.	New York, N. Y.	32	M-O-D	3619	
General Reserves Trust Fund Series A	New York, N. Y.	311-	M-O-D	4631	United Resources Corp.
George Putnam Fund of Boston	Boston, Mass.	65	M-O-D	4416	
General Investors Trust	Boston, Mass.	76	M-O-D	3690	
General Capital Corp.	Boston, Mass.	144	M-O-D	2113	
Group Securities, Inc.	Jersey City, N. J.	214	M-O-D	4944	
Independence Fund Declaration of Trust	New York, N. Y.	129	M-O-D	4958	National Securities & Research Corp.
Independence Trust Shares	Philadelphia, Pa.	340	U-A	3679	Independence Shares Corp.
Income Foundation Fund, Inc.	Baltimore, Md.	1	M-O-D	1197	
Institutional Securities Ltd.	Jersey City, N. J.	15	M-O-D	3115	
Investors Mutual, Inc.	Minneapolis, Minn.	54	M-O-D	4296	
Investors Fund C, Inc.	New York, N. Y.	35	M-O-D	4314	
Investors Mutual Fund, Inc.	Kansas City,	457	M-O-D	4669	
Investment Company of America	Jersey City, N. J.	116	M-O-D	3907	
Incorporated Investors	Boston, Mass.	159	M-O-D	3774	
Kaickerbecker Fund	Jersey City, N. J.	36	M-O-D	3885	Pettit Bryan & Kahlbach

Trust	Address	Investment Co. File No. 811-	Codes	Securities Act File No. 2-	Sponsor
Keystone Custodian Fund B 1	Boston, Mass.	92	M-O-D	4952	Keystone Custodian Fund, Inc.
" " " B 2	" "	93	"	4942	" " " "
" " " B 3	" "	94	"	4953	" " " "
" " " B 4	" "	95	"	4955	" " " "
" " " K 1	" "	96	"	4550	" " " "
" " " K 2	" "	97	"	4954	" " " "
" " " S 1	" "	98	"	4552	" " " "
" " " S 2	" "	99	"	4943	" " " "
" " " S 3	" "	100	"	4554	" " " "
" " " S 4	" "	101	"	4955	" " " "
Loomis-Sayles Mutual Fund, Inc.	Boston, Mass.	82	M-O-D	4046	
Loomis-Sayles Second Fund, Inc.	Boston, Mass.	83	M-O-D	2805	
Lexington Trust Fund Cts.	New York, N. Y.	38	M-O-D	3850	American Trusteed Funds
Massachusetts Investors Second Fund	Boston, Mass.	202	M-O-D	2006	
Massachusetts Investors Trust	Boston, Mass.	203	M-O-D	4671	
Manhattan Bond Fund	Jersey City, N. J.	53	M-O-D	3575	
Mutual Investment Company of America	Wilmington, Del.	184	M-O-D	3812	
National Investors Corp.	New York, N. Y.	229	M-O-D	3606	
New York Stocks	Jersey City, N. J.	34	M-O-D	3882	
New England Fund	Boston, Mass.	156	M-O-D	4006	
Nationwide Securities Company	Jersey City, N. J.	134	M-O-D	550	
National Securities Series	New York, N. Y.	131	M-O-D	4779	National Securities & Research Corp.
Pan American Investment Fund, Inc.	Los Angeles, Calif.	64	M-O-D	4126	
Republic Investors Fund, Inc.	New York, N. Y.	118	M-O-D	3879	
Souder Stevens & Clark Fund, Inc.	Boston, Mass.	42	M-O-D	3355	
Shareholders Corporation	Seattle, Wash.	277	M-O-D	1141	
State Street Investment Corp.	Boston, Mass.	84	M-O-D	4945	
Sovereign Investors, Inc.	Jersey City, N. J.	115	M-O-D	3686	
Standard Utilities	Jersey City, N. J.	172	M-O-E	1986	
Selected American Shares, Inc.	Chicago, Ill.	51	M-O-D	3492	
Supervised Shares	Des Moines, Iowa	157	M-O-D	4632	
Trust Endowment Shares Series A	New York, N. Y.	175	U-A	922	Corporate Equities, Inc.
Trusteed Industry Shares	Jersey City, N. J.	176	M-O-D	3685	T. I. S. Management Company
Union Trusteed Funds, Inc.	Jersey City, N. J.	13	M-O-D	4757	
United Funds, Inc.	Philadelphia, Pa.	208	M-O-D	4533	
Wellington Fund, Inc.	Camden, N. J.	121	M-O-D	3418	
Wisconsin Investment Company	Milwaukee, Wis.	216	M-O-D	3725	
Elfun Trusts	New York, N. Y.		U-A	4327	

TABLE B

American Annuity Savings Association	Lansing, Mich.	417	F	4734	
Associated Fund Trust	St. Louis, Mo.	18	P-A-M-O-D	4667	Associated Funds, Inc.
Corporate Leaders Trust Fund	New York, N. Y.	91	P-U-A	4682	Corporate Leaders of America, Inc.
Commonwealth Fund Plans A & B	Boston, Mass.	70	P-A-M-O-D	4344	Trust Funds, Inc.
Dominion Plan Series T S	Philadelphia, Pa.	106	P-U-A	4321	Income Estates of America, Inc.
Foundation Trust Shares Series A (1932)	New York, N. Y.	26	P-U-A	3524	Foundation Plan, Inc.
Founders Mutual Fund	Denver, Col.	357	P-U-A	3747	Founders Mutual Dep. Corp.
First Investors Shares Periodic Pay	New York, N. Y.	343	P-U-A	4486	First Investors Shares Corp.
Financial Industrial Fund	Denver, Col.	353	P-U-A	3503	Financial Industrial Fund, Inc.
Hamilton Trust Shares	Denver, Col.	354	P-U-A	3819	Hamilton Depositor Corp.
Independence Fund Declaration of Trust & Agreement	New York, N. Y.	129	P-A-M-O-D	4957	National Securities & Research Corp.
Independence Trust Shares Purchase Plan	Philadelphia, Pa.	342	P-U-A	3679	Independence Shares Corp.
Income Foundation Fund Trust Agreements	Baltimore, Md.	396	P-U-A	1197	Income Foundation Fund, Inc.
Investors Syndicate of America, Inc.	Minneapolis, Minn.	2	F	4599	

<u>Trust</u>	<u>Address</u>	<u>Investment Co. File No. 611-</u>	<u>Codes</u>	<u>Securities Act File No. 2-</u>	<u>Sponsor</u>
Investors Fund C Trust	Kansas City, Mo.	224	P-U-A	4681	Investors Fund, Inc.
Lexington Trust Fund Plans	New York, N. Y.	432	P-U-A	3691	
The Pilgrim Fund	Detroit, Mich.	376	P-A-M-O-D	4802	Pilgrim Investors, Inc.
State Bond & Mortgage Company	Ulm, Minn.	407	F	4659	
Texas-Arkansas Fund	Dallas, Texas	46	P-U-A	4806	Texas-Arkansas Fund, Inc.
United Fund Accumulative Stock Purchase Agreements	Philadelphia, Pa.	447	P-A-M-O-D	4877	United Funds, Inc.
Insurance Securities Inc., Trust Fund	Oakland, Calif.	397	P-A-M-O-D	4979*	
Insurance Investors Fund, Inc.	Seattle, Wash.	263	P-A-M-O-D	4980*	Insurance Investors Fund, Inc.
Trusted Estates of Oregon	Portland, Oregon	228	P-U-A	4930*	
Trusted Estates of Washington	Seattle, Wash.	230	P-U-A	4931*	

*Pending filings.

INVESTMENT COMPANIES NOT EFFECTIVELY REGISTERED UNDER THE SECURITIES ACT OF 1933

TABLE C

<u>Trust</u>	<u>Address</u>	<u>Investment Co. File No. 611-</u>	<u>Codes</u>	<u>Securities Act File No. 2-</u>	<u>Sponsor</u>
Collateral Investment Co.	Birmingham, Ala.	420	F		
Equity Underwriters, Inc.	Columbia, S. C.	429	F		
Fidel Association of N. Y., Inc.	Wheeling, W. Va.	414	F		
Fidelity Investment Association	Wheeling, W. Va.	419	F		
Great American Life Underwriters, Inc.	San Antonio, Texas	423	F		
Investors Syndicate	Minneapolis, Minn.	415	F		
Pioneer National Corp.	Kansas City, Mo.	424	F		
Secured Underwriters, Inc.	Indianapolis, Ind.	444	F		
Southern Indemnity Underwriters, Inc.	Louisville, Ky.	446	F		
Standard System Investment Corp.	Savannah, Ga.	481	F		
United Funds Management Corp.	Philadelphia, Pa.	209	F	4226	
American Participation Trust Cdfs.	Springfield, Mo.	197	P-U-I	484	American Participation, Inc.
Mutual Fund of Calif. Series A Trust	San Francisco, Calif.	188	P-I-M-O-D	4485	Mutual Fund of Calif.
Corporate Leaders Trust Fund Continental Plan	New York, N. Y.	90	P-U-I	88	Corporate Leaders of America, Inc.
Capital Savings Plan Cdfs.	Philadelphia, Pa.	341	P-U-I	22	Independence Shares Corp.
Arkansas Fund	Little Rock, Ark.		P-U-I		The Arkansas Fund, Inc.
Commonwealth Fund Trust Cdfs.	San Francisco, Calif.	390	P-U-I		North American Securities Co.
Diversified Fund Trust Shares	Albuquerque, N. Mex.	356	P-I-M-O-D		Diversified Fund Corp.
Fund American Trust Cdfs.	New York, N. Y.	104	P-U-I	1181	Fundamerican Corp.
Independence Fund Trust Cdfs.	New York, N. Y.	127	P-U-I	25	National Securities & Research Corp.
Individual Assured Estates	San Francisco, Calif.	489	P-U-I		Individual Assured Estates, Inc.
Industrial Associates of Mass., Inc.	Boston, Mass.	347	P-U-I		
Insurance Stock Plan	Jersey City, N. J.	103	P-U-I		Transcontinent Shares Corp.
Lexington Foundation Trust Cdfs.	New York, N. Y.	402	P-U-I	1086	Lexington Foundation, Inc.
Liberty Thrift Foundation Cdfs.	New York, N. Y.	171	P-U-I	2776	Liberty Thrift Foundation, Inc.
National Plan Cdfs.	Philadelphia, Pa.	440	P-U-I	67	National Plan, Inc.
Protected Investors of America Trust (1934)	San Francisco, Calif.	480	P-U-I		Protected Investors of America, Inc.
Protected Investors of America Trust (1937)	San Francisco, Calif.	72	P-U-I	922	Protected Investors of America, Inc.
Standard Trust Foundation	New York, N. Y.	221	P-U-I	8	Standard Foundations of America, Inc.
Trust Endowment Agreements	New York, N. Y.	174	P-U-I	922	Corporate Equities, Inc.
Trusted Annuities Fund	Seattle, Wash.	350	P-I-M-O-D	3457	Trusted Annuities, Inc.
United Funds Accumulative Series TA	Philadelphia, Pa.	206	P-I-M-O-D	4220	United Funds Management Corp.
Wellington Plan Cdfs.	Philadelphia, Pa.	180	P-U-I	1650	Wellington Foundation
Benjamin Franklin Foundation Cdfs.	Philadelphia, Pa.	89	P-U-I	1826	Benjamin Franklin Corp.

<u>Trust</u>	<u>Address</u>	<u>Investment Co.</u> <u>File No. 811-</u>	<u>Codes</u>	<u>Securities Act</u> <u>File No. 2-</u>	<u>Sponsor</u>
Dominion Plan	Philadelphia, Pa.	108	P-U-I	764	Income Estates of America
Trusteed Income Estates Cts. Series B	Philadelphia, Pa.	109	P-U-I	3120	Income Estates of America
Trusteed Income Estates Series C	Philadelphia, Pa.	107	P-U-I	3120	Income Estates of America
Trusteed Income Estates (Gov. Inv.)	Philadelphia, Pa.	108	P-U-I	3120	Income Estates of America
Trusteed Income Estates (T.I.S.)	Philadelphia, Pa.	110	P-U-I	3120	Income Estates of America
Financial Independence Founders Series D	New York, N. Y.	344	P-U-I	4456	First Investors Shares Corp.
P. I. F. Plan Corp. Series K-D	New York, N. Y.	345	P-U-I	4456	First Investors Shares Corp.
Foundation Plan Trust Agreement (1933)	New York, N. Y.	20	P-U-I	76	Foundation Plan, Inc.
Foundation Plan Trust Agreement (1938)	New York, N. Y.	25	P-U-I	76	Foundation Plan, Inc.
Income Foundation Fund Agreements	Baltimore, Md.	6	P-U-I	1197	Income Foundation, Inc.
Investors Fund Series A	Kansas City, Mo.	307	P-U-I	71	Investors Fund, Inc.
Investors Fund Series B	Kansas City, Mo.	223	P-U-I	71	Investors Fund, Inc.

P - Periodic Plan
 M - Management
 O - Open end
 C - Closed end
 D - Diversified
 N - Non-Diversified
 U - Unit
 A - Active
 I - Inactive

Table A -- Management and Unit Trusts presently selling on effective registrations.

Table B -- Face Amount and Periodic Plan companies selling new certificates and collecting on outstanding certificates.

Table C -- Face Amount and Periodic Plan companies not selling new certificates but collecting on outstanding certificates.