

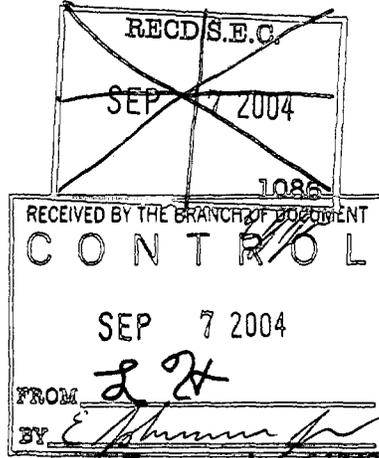


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811-7758

PO Box 4333  
Houston, TX 77210-4333  
11 Greenway Plaza, Suite 100  
Houston, TX 77046-1173  
713 626 1919

A I M Advisors, Inc.

July 19, 2004



VIA CERTIFIED MAIL/RRR

Securities and Exchange Commission  
450 Fifth Street  
Washington, D.C. 20549

Re: Filing Pursuant to Section 33 of the Investment Company Act of 1940 by A I M Advisors, Inc. (1940 Act Registration No. 801-12313)

Ladies and Gentlemen:

Pursuant to Section 33 of the Investment Company Act of 1940, we hereby file on behalf of A I M Advisors, Inc., an investment adviser, a copy of **Plaintiff's Initial Disclosures and Automatic Disclosure Statement of Independent Directors** in *Lawrence Zucker, et al. v. A I M Advisors, Inc.*

Sincerely,

Stephen R. Rimes  
Assistant General Counsel



Enclosures

cc: Mr. Robert B. Pike, SEC - Fort Worth  
Mr. James Perry, SEC - Fort Worth

PROCESSED

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THOMSON FINANCIAL

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The named Defendants, and Defendants' employees and agents with pertinent information.

2. Fed. R. Civ. P. 26(a)(1)(B) - Pertinent Documents in Plaintiff's Possession:

Monthly account statements and some publicly available documents sent to Plaintiff by the Defendants.

3. Fed. R. Civ. P. 26(a)(1)(c) - Computation of Damages:

Damages cannot be computed with any reasonable accuracy prior to discovery and consultation with an expert who will perform a damages analysis.

4. Fed. R. Civ. P. 26(a)(1)(D) - The Contents of Any Insurance Agreement:

None.

DATED: July 16, 2004.

Respectfully submitted,

By: 

Roger B. Greenberg  
Attorney-In-Charge  
State Bar No. 08390000  
Federal I.D. No. 3932  
Schwartz, Junell, Greenberg &  
Oathout, L.L.P.  
909 Fannin St., Suite 2000  
Houston, TX 77010  
713-752-0017 Telephone  
713-752-0327 Telephone

ZIMMERMAN, LEVI & KORSINSKY, LLP  
Eduard Korsinsky  
39 Broadway, Suite 1440  
New York, NY 10006  
Telephone: 212/363-7500  
Facsimile: 212/363-7171



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing *Plaintiff's Initial Disclosures* was served on the following counsel of record, in accordance with the Federal Rules of Civil Procedure, on this 16<sup>th</sup> day of July, 2004.

Daniel A. Pollack (via CM/RRR)  
Edward T. McDermott  
Anthony Zaccaria  
Pollack & Kaminsky  
114 West 47<sup>th</sup> Street  
Suite 1900  
New York, NY 10036

Glen M. Boudreaux (via hand-delivery)  
Boudreaux, Leonard & Hammond, P.C.  
Two Houston Center  
909 Fannin St., Suite 2350  
Houston, Texas 77010

Jacks C. Nickens (via CM/RRR)  
Richard P. Keeton  
Paul D. Flack  
Nickens Keeton Lawless Farrell & Flack  
600 Travis, Suite 7500  
Houston, Texas 77002

  
Roger B. Greenberg  
Roger B. Greenberg

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Lawrence Zucker, on behalf of AIM Small  
Cap Growth Fund/A, AIM Small Cap Growth  
Fund/B, AIM Small Cap Growth Fund/C  
and AIM Limited Maturity Treasury Fund/A

Plaintiff,

v.

Civ. Action No. H 03-5653

AIM Advisors, Inc., Bob R. Baker, James T.  
Bunch, Gerald J. Lewis, Larry Soll,  
Frank S. Bayley, Bruce L. Crockett,  
Albert R. Dowden, Edward K. Dunn, Jr.,  
Jack M. Fields, Carl Frischling,  
Prema Mathai-Davis, Lewis F. Pennock, Ruth  
M. Quigley, Louis S. Sklar, Robert H. Graham  
and Mark Williamson,

Defendants

and

AIM Investment Securities Fund and AIM  
Growth Series,

Nominal Defendants

**AUTOMATIC DISCLOSURE STATEMENT  
OF INDEPENDENT DIRECTORS**

Defendants Bob Baker, Frank Bayley, James Bunch, Bruce Crockett, Prema Mathai-Davis,  
Albert Dowden, Edward Dunn, Jr., Jack Fields, Carl Frischling, Gerald Lewis, Lewis Pennock, Ruth  
Quigley, Louis Sklar and Lawrence Soll (collectively, the "Independent Directors"), by their  
undersigned attorneys, Nickens Keeton Lawless Farrell & Flack, for their Automatic Disclosure  
pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, state as follows:

1. This initial disclosure is made upon a good faith review of information reasonably available at this time. The Independent Directors reserve the right to make subsequent disclosures in the course of discovery.

2. The Independent Directors, in making their initial disclosures, expressly reserve any and all objections, including, but not limited to, relevance, materiality, competence, privilege, overbreadth, undue burden or other grounds.

**INITIAL DISCLOSURES**

Subject to the foregoing reservations and exceptions, and without waiver thereof, the Independent Directors respond to the initial disclosures items under Fed. R. Civ. P. Rule 26(a)(1) as follows:

**I. Persons Potentially With Information**

The following persons are likely to have discoverable information that the Independent Directors may use to support their defense in this action:

1. The Independent Directors.
2. The other named defendants and their agents.
3. The witnesses identified by the other named defendants in this action.

Each of these persons is expected to possess information concerning the reasonableness of the challenged fees. By making the foregoing disclosures, the Independent Directors do not concede that all of these individuals should necessarily be deposed. The Independent Directors expressly reserve the right to object to the deposition of any of these persons as discovery proceeds.

## **II. Document Categories/Locations**

The following categories of documents may be used by the Independent Directors to support their defense in this action:

1. Distribution Agreements.
2. Rule 12b-1 Distribution Plans for the Funds.
3. Rule 12b-1 reports (quarterly and annual) presented to the Board of Trustees.
4. Minutes of trustees' meetings and board book material about the closing of the Funds to certain investors and/or the approvals of the 12b-1 Plans and Distribution Agreements.

These documents are believed to be in the custody of AIM Advisors, Inc. in Houston, Texas. Some of the documents contained in each of these categories of documents may be subject to privileges, as set forth in Fed. R. Civ. P. 26 and other applicable provisions, or may be discoverable only upon execution of an appropriate stipulation and order of confidentiality.

## **III. Insurance Agreements**

The Independent Directors deny that they are liable for any damages claimed in the First Amended Complaint. However, assuming that any such damages were to be assessed against the Independent Directors, all or part of such damages may be covered under insurance policies, copies of which will be provided under separate cover.

Dated: July 16, 2004

NICKENS KEETON LAWLESS FARRELL  
& FLACK, LLP



Jack C. Nickens  
State Bar No. 15013800  
Federal I.D. No. 4419

Attorney-in-Charge for Defendants  
Bob R. Baker, James T. Bunch,  
Gerald J. Lewis, Frank S. Bayley,  
Bruce L. Crockett, Albert R. Dowden,  
Edward K. Dunn, Jr., Jack M. Fields,  
Carl Frischling, Prema Mathai-Davis,  
Lewis F. Pennock, Ruth Quigley, Louis S.  
Sklar and Lawrence Soll

OF COUNSEL:

Richard P. Keeton  
State Bar No. 11175000  
Federal I.D. No. 4643  
Paul D. Flack  
State Bar No. 00786930  
Federal I.D. No. 0546  
NICKENS KEETON LAWLESS  
FARRELL & FLACK, LLP  
600 Travis Street, Suite 7500  
Houston, Texas 77002  
Tel: (713) 571-9191  
Fax: (713) 571-9652