



AIM MANDY
MARKET FUNDS
INC

40-33
811-02606
Branch 18

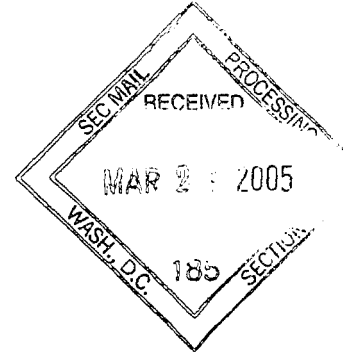
PO Box 4333
Houston, TX 77210-4333
11 Greenway Plaza, Suite 100
Houston, TX 77046-1173
713 626 1919

A I M Advisors, Inc.

March 15, 2005

VIA CERTIFIED MAIL/RRR

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

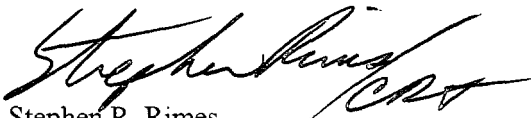


Re: Filing Pursuant to Section 33 of the Investment Company Act of 1940 by INVESCO Funds Group, Inc., INVESCO Institutional, Inc., INVESCO Distributors, Inc., A I M Advisors, Inc. (1940 Act Registration No. 801-12313), and A I M Distributors, Inc. (1933 Act Registration No. 8-21323)

Ladies and Gentlemen:

Pursuant to Section 33 of the Investment Company Act of 1940, we hereby file on behalf of INVESCO Funds Group, Inc., INVESCO Institutional, Inc., INVESCO Distributors, Inc., A I M Advisors, Inc., an investment adviser, and A I M Distributors, Inc., a distributor, a copy of a **Defendants A I M Advisors, Inc. and A I M Distributors, Inc. Initial Disclosures Pursuant to Rule 26(A)(1) in Ronald Kondracki v. A I M Advisors, Inc., and A I M Distributors, Inc.**

Sincerely,



Stephen R. Rimes
Assistant General Counsel

Enclosures

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

PROCESSED

APR 08 2005

 THOMSON
FINANCIAL

I. Persons Potentially With Information

On Exhibit A (attached hereto), A I M identifies individuals who are likely to have discoverable information that may be used to support A I M's defense, along with the subjects of such information.

By making the foregoing disclosures, A I M does not concede that all of these individuals should necessarily be deposed. A I M expressly reserves the right to object to the deposition of any of these persons as discovery proceeds.

II. Document Categories/Locations

1. On Exhibit B, A I M describes, by category, documents that bear on their defenses. These documents are believed to be in the custody of A I M in Houston, Texas.

III. Damages

A I M reserves the right to assert a claim for attorneys' fees and court costs incurred in this action as may be permitted by law.

IV. Insurance Agreements

A I M denies that it is liable for any damages claimed in the Complaint. However, assuming that any such damages were to be assessed against A I M, all or part of such damages may be covered under insurance policies, copies of which will be provided under separate cover after entry of an appropriate discovery order.

Dated: March 11, 2005

Respectfully submitted,

POLLACK & KAMINSKY

by: 

Daniel A. Pollack
Edward T. McDermott
Anthony Zaccaria

114 West 47th Street, Suite 1900
New York, New York 10036
Tel. (212) 575-4700
Fax (212) 575-6560

Charles S. Kelley
Texas SBA#11199580
MAYER, BROWN, ROWE & MAW LLP
700 Louisiana, Suite 3600
Houston, Texas 77002
Tel. (713) 547-9634
Fax (713) 632-1834

Michael K. Oldham
GIBBS & BRUNS, LLP
1100 Louisiana, Ste. 5300
Houston, Texas 77002
Tel. (713) 751-5268
Fax (713) 750-0903

Counsel for Defendants
A I M Advisors, Inc. and
A I M Distributors, Inc.

EXHIBIT A

| Name | Address | Position | Subject |
|----------------------|---|--|---|
| Gene Needles | 11 Greenway Plaza Houston, Texas 77046 (713) 626-1919 | Director - Retail Marketing, AIM Distributors | Nature and Quality of Distribution Services |
| Dawn M. Hawley | 11 Greenway Plaza Houston, Texas 77046 (713) 626-1919 | Chief Financial Officer, AIM Advisors, AIM Distributors | Profitability |
| Sheri Steward Morris | 11 Greenway Plaza Houston, Texas 77046 (713) 626-1919 | Assistant Fund Accounting Controller, AIM Advisors, AIM Distributors | Advisory and Distribution Fees |
| Dana R. Sutton | 11 Greenway Plaza Houston, Texas 77046 (713) 626-1919 | Former Director - Fund Administration, AIM Advisors, AIM Distributors | Advisory and Distribution Fees |
| Bruce L. Crockett | 11 Greenway Plaza Houston, Texas 77046 (713) 626-1919 | Disinterested Trustee of AIM Funds | Board of Trustees' consideration of advisory and distribution agreements and Rule 12b-1 Plans |
| Frank S. Bayley | 11 Greenway Plaza Houston, Texas 77046 (713) 626-1919 | Disinterested Trustee of AIM Funds | Board of Trustees' consideration of advisory and distribution agreements and Rule 12b-1 Plans |
| Robert H. Graham | 11 Greenway Plaza Houston, Texas 77046 (713) 626-1919 | Chairman of the Board of Trustees, Chairman of AIM and Trustee of AIM Funds | Board of Trustees' consideration of advisory and distribution agreements and Rule 12b-1 Plans |
| Gary K. Wendler | 11 Greenway Plaza Houston, Texas 77046 (713) 626-1919 | Market Research and Analysis Manager | Fund Performance Analysis |
| Ronald Kondracki | 3005 Chadwick Drive Florissant, MO 63033 | Plaintiff | Alleged status as shareholder of AIM Asia Pacific Growth Fund, AIM International Growth Fund and AIM Mid Cap Core Equity Fund |

EXHIBIT BDocuments

Documents relating to the advisory and distribution services provided to the AIM Asia Pacific Growth Fund, AIM International Growth Fund and AIM Mid Cap Core Equity Fund (the "Funds"):

1. Advisory agreements between the Funds and A I M Advisors.
2. Section 15(c) reports submitted to the Funds' Boards of Trustees.
3. Distribution Agreement between the Funds and A I M Distributors.
4. Rule 12b-1 Distribution Plans for the Funds.
5. Rule 12b-1 reports presented to the Board of Trustees.
6. Minutes of trustees' meetings and board book materials reflecting renewal of relevant contracts and plans.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served by first-class mail, postage prepaid, upon the attorneys listed below, on this 11th day of March, 2005:

Robin L. Harrison
Campbell Harrison & Dagley, L.L.P.
4000 Two Houston Center
Houston, TX 77010

Lynn L. Sarko
Michael D. Woerner
Gretchen F. Cappio
Keller, Rohrback, L.L.P.
1201 Third Avenue, #3200
Seattle, WA 98901

ATTORNEYS FOR PLAINTIFFS

A handwritten signature in black ink, appearing to read "Anthony J. Jarama", is written over a horizontal line.



40-33

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

A I M Advisors, Inc.

March 11, 2005

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 AIM Investments, LTD., A I M Advisors, Inc. (1940 Act Registration No. 801-12313), A I M Capital Management, Inc., INVESCO Institutional (N.A.), Inc., and the following persons:

Bob R. Baker
Frank S. Bayley
James T. Bunch
Bruce L. Crockett
Albert R. Dowden
Edward K. Dunn, Jr.
Jack M. Fields
Carl Frischling

Robert H. Graham
Gerald J. Lewis
Prema Mathai-Davis
Lewis F. Pennock
Ruth H. Quigley
Louis S. Sklar
Larry Soll
Mark H. Williamson

Ladies and Gentlemen:

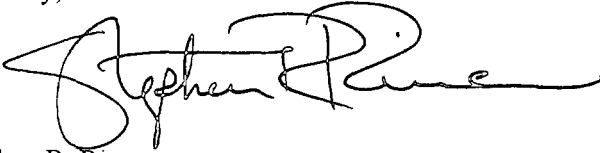
Pursuant to Section 33 of the Investment Company Act of 1940, we hereby file on behalf of AIM Investments, LTD., A I M Advisors, Inc. (1940 Act Registration No. 801-12313), A I M Capital Management, Inc., INVESCO Institutional (N.A.), Inc., and the following persons, a copy of an **Order on Stipulation to Enlarge Time for Defendants AIM Investments, LTD., A I M Advisors, Inc., A I M Capital Management, Inc., and INVESCO Institutional (N.A.), Inc. to Respond to the Class Action Complaint in *Avo Hogan, et al. v. AIM Investments, LTD., et al.***

Bob R. Baker
Frank S. Bayley
James T. Bunch
Bruce L. Crockett
Albert R. Dowden
Edward K. Dunn, Jr.
Jack M. Fields
Carl Frischling

Robert H. Graham
Gerald J. Lewis
Prema Mathai-Davis
Lewis F. Pennock
Ruth H. Quigley
Louis S. Sklar
Larry Soll
Mark H. Williamson

March 11, 2005
Page 2

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Rimes". The signature is fluid and cursive, with a large initial "S" and "R".

Stephen R. Rimes
Assistant General Counsel

Enclosures

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

8

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
MAR - 7 2005
CLERK, U.S. DISTRICT COURT
By _____ Deputy *fb*

AVO HOGAN, and JULIAN W. MEADOWS, §
On Behalf of Themselves and All Others §
Similarly Situated, §

Plaintiffs, §

v. §

BOB R. BAKER, et al., §

Defendants. §

Civil Action No. 3:05CV73P

**ORDER ON STIPULATION TO ENLARGE TIME FOR
DEFENDANTS AIM INVESTMENTS, LTD., AIM ADVISORS, INC.,
AIM CAPITAL MANAGEMENT INC., AND INVESCO INSTITUTIONAL (N.A.), INC.
TO RESPOND TO THE CLASS ACTION COMPLAINT**

On March 7, 2005, the Court considered the Stipulation of Plaintiffs and Defendants, Aim Investments, LTD., Aim Advisors, Inc., Aim Capital Management Inc., and Invesco Institutional (N.A.), Inc. to Enlarge Time to Respond to the Complaint. After considering the Stipulation, the Court GRANTS the request to extend the time to answer, move or otherwise respond to the Complaint until April 8, 2005.

SIGNED ON THE 7th DAY OF March, 2005.

Jose A. Solis
UNITED STATES DISTRICT JUDGE