

801.30

From: [REDACTED]
To: [REDACTED]
Date: Tue, Mar 14, 2000 9:56 AM
Subject: 801.30

(V1.6) - 1 attachment transferred by the recipient that, when someone acquires

the acquired person does not know with certainty who will acquire its shares in the IPO. Nor is there an agreement between the acquiring and acquired persons. You indicated that the acquired person should attach the

contract to the IPO. Can the issuer who is considered a holder if not, why not?

I appreciate your thoughts. Thanks,

Phone: [REDACTED]

ISNT A PURCHASE OF STOCK IN AN IPO ESSENTIALLY AN OPEN MARKET PURCHASE? COULDN'T WE EXTEND 801.30 TREATMENT TO

Email address: [REDACTED]

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What basis?

(V1.6)

R. SMITH COMMENTS THAT AS LONG AS THERE IS NO CONTRACT ESTABLISHING THE PERSON ACQUIRING SHARES IN THE IPO & THE UNDERLYING THIS WOULD BE AN 801.30 TRANSACTION.

Michael VEME 3/21/00