

EO 1.13(w)(ii)

From: [REDACTED]  
To: HO.DCMAIL2(MVERNF)

Mike-

This is the question I wanted to ask you on Friday afternoon.

S sells B \$17 million in assets but does not report, although the transaction

S. What is the value of the second transaction, \$5 million or \$22 million?  
Section 801.13(w)(ii) is not clearly indicate whether assets acquired in the

purposes of the SOT test, the value of unreported acquisitions are always aggregated with later transactions, but I have nothing in the database on this point.

I'd appreciate your answer asap. [REDACTED]

Thanks.

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CC: FTC [REDACTED]

SEE ATTACHED  
B Michael Verna  
5/8/00