

[REDACTED]

*Rule
801.14*

[REDACTED]

FACSIMILE

June 26, 2000

FACSIMILE # 000 276 2624

Federal Trade Commission
Premerger Notification Office
Room 303
Washington, D.C. 20580

Dear Alice:

As we discussed yesterday, I would appreciate your advice regarding the reportability of the following transaction.

Statement of Facts

[REDACTED] holds in excess of 15 million/15% of the outstanding voting securities of D

[REDACTED]

acquire \$5 million of voting securities of B1. A will be entitled to designate one director of B1

[REDACTED] D will be [REDACTED] interest in B1

The question is whether A, because of his current ownership interest in B, has a filing obligation under the provisions of [REDACTED] 16 D cross to continue to

Alice Villavicencio
June 26, 2000
Page 2

aggregated with the stock to be acquired in B1. I am not sure that this name matches the one...

Very truly yours,

[Redacted signature]

6/27/2000 and
6/27/2000.

Called Writer.

If the acquisition of Band B by C
occurs before the acquisition of
A's purchase of B's equity stock valued
at \$5MM then only C is required
to file. Also must use appropriate
Here 801.14.1
ARM/PS agrees

