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Dane Abrahamsen, Esq.
 February 29, 1984
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permarkets for less than \$15 million is exempt under the minimum dollar value exemption (16 C.F.R. § 802.20) so long as no avoidance was intended (16 C.F.R. § 801.90). I further informed you that no avoidance was involved and that, in fact, when it was negotiated the parties had been unaware that the transaction might be exempt from

the Act.

Following our initial conversation on this matter we spoke again, at which time you informed me that you had discussed the above analysis with Roberta Baruch, Assistant Director For Evaluation, and that she also agreed with your conclusion that the notice and waiting period requirements of Section 7A do not apply to the



proceeding on that basis