

OUR FILE NUMBER [REDACTED]

WRITER'S DIRECT DIAL NUMBER [REDACTED]

May 7, 1987

Mr. Andrew Scanlon
Premerger Notification Specialist
Room 301

MAY 11 10 51 AM '87

Dear Mr. Scanlon:

This letter is to confirm matters we discussed in our telephone conversation on May 7, 1987 concerning the Hart-Scott-Rodino Premerger Notification Form. I asked you whether a partnership 99% owned by an individual and 1% owned by an irrevocable trust in favor of the individual's children would be deemed controlled by the individual. You stated that the partnership would not be deemed to be controlled by the individual. Thus, revenues of the partnership would not be attributed to the individual. I also asked you if revenues from

the reporting person's "operations" in various industries.

I would appreciate your written confirmation of the accuracy of the foregoing discussion by your return of this letter with your signature at the bottom of the next page. It is my

Express and bill to our account number [REDACTED]

Mr. Andrew Scanlon
May 7

Thank you very much for your cooperation. I have found you to be most informative in matters concerning reporting under the Hart-Scott-Rodino Act.

Very truly yours
[Redacted]

Mr. Andrew Scanlon
Premerger Notification Specialist
Federal Trade Commission

cc: [Redacted]

5/10/81 J/C [Redacted] of Scanlon

I advised [Redacted] that relative to the partnership and the swimmers this letter is accurate provided that it is not for the purpose of loading HSR - as in 801.90 but that the last two sentences of the first paragraph are inaccurate - all revenues must be reported I referred him to the PHN Register Manual produced by ABA "Interpretation" 181