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February 5, 1991

TELECOPIER (202) 326-2050

Ms. Nancy M. Ovuka Compliance Specialist Premerger Notification Office Bureau of Competition, Room 303 Federal Trade Commission Washington, DC 20580 RECFIVED

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Dear Ms. Ovuka:

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	connection with the nurses-t arears the decombed below
	a real estate investment trust (herein, the which is in
	the business of providing purchase/lease or mortgage financing for
	Internal Revenue Code. As you are aware, continued qualification
	under the Tabenna Berenus Gods on a west settle derrotte trust
	of the businesses of which it has purchased the assets. In order
	to be sure of satisfying the income limitations, the does not
	pperate any of the businesses for which it has provided financing.
	or lease, and then only for a limited noring of time.

premerger regulations.

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on the limitations which the Internal Revenue Code imposes on the activities, the acquisition of the businesses by merger with Mr. A's subsidiary and their lease to the limited partnership would be considered to be within the ordinary course of the business and, thus, exempt from premerger notification pursuant to

After you have had an opportunity to review this letter, please call me at with any questions or to further discuss the necessity for premerger notification in connection with the proposed transaction described in this letter.

Very truly yours,