

7A(c)(1)



February 5, 1991

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

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PRE-MERGER
NOTIFICATION
OFFICE

Dear Ms. Ovuka:

~~My letter to be followed by our earlier discussion~~
~~connection with the proposed transactions described below~~

a real estate investment trust (herein, the ~~trust~~ which is in
the business of providing purchase/lease or mortgage financing for
~~certain operating businesses. The trust intends to be used to~~

Internal Revenue Code. As you are aware, continued qualification
under the Internal Revenue Code as a real estate investment trust

of the businesses of which it has purchased the assets. In order
to be sure of satisfying the income limitations, the ~~trust~~ does not
operate any of the businesses for which it has provided financing.

or lease and then only for a limited period of time.

corporation controlled by Mr. A ~~the businesses will be acquired~~

premerger regulations.

