

[REDACTED]

[REDACTED]

March 25, 1991

This material may be subject to the confidentiality provisions of the Freedom of Information Act

VIA FEDERAL EXPRESS

Freedom of Information Act RECEIVED
MARCH 25 1991
FEDERAL TRADE COMMISSION
WASHINGTON, D.C.

Dick Smith, Esq.
Federal Trade Commission
Bureau of Competition
Premerger Notification Office
Room 303
Sixth Street and Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: Supplement to request for informal interpretations under the
[REDACTED]

Dear Mr. Smith:

Per your telephone call to me regarding our letter dated March 22, 1991, enclosed please find a copy of page 2 of the [REDACTED] financial statements showing the asset side of the balance sheet that you said was missing. This page is obviously subject to the Attorney's Note to Financial Statements of [REDACTED] appended to our March 22, 1991 letter to you.

With regard to your other questions, the accountants have advised me that the personal financial statements also include [REDACTED] property. Also, [REDACTED] was recently formed to own [REDACTED] that has been purchased and may in the future generate net sales by the leasing thereof and maintenance operations. These sales can be expected to be less than \$5,000,000 per year for the time being. [REDACTED] only holds land for the time being and does not generate net sales.

Regarding your inquiry as to whether [REDACTED] are controlled by any other person within the meaning of the regulations, we have determined that they are not.

Dick Smith, Esq.
March 25, 1991
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If any further information is required, please do not hesitate to contact me.

[REDACTED]

[REDACTED]

12/19/91 advised [REDACTED] that, all

[REDACTED]

100 AM [REDACTED]

no [REDACTED]

100 AM
no reportable transaction between
parties can take place. The financials
are less than 15 months old prior to the
date of which [REDACTED]
will take place.