

801.10 (b)

[REDACTED]

[REDACTED]

July 16, 1999

[REDACTED]

Richard B. Smith
Federal Trade Commission

Washington, D.C. 20547

Dear Mr. Smith:

ALL TRADE
ASSOCIATION
NOTIFICATION
FIDE
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understanding that the PNO would view the acquisition by a third party of 100% of

viewed as an asset acquisition, it is only a reportable event if the total value of the

Very truly yours,

[REDACTED]

cc: [REDACTED] 7/20/99 Called writer and advised that, as
there, you do have an acquisition price for a reasonable
proof for an acquisition price, which buyer is not presently within the LLC for
the assets. Pursuant to rule 801.10, a fair market value of the LLC's assets
to address that a filing