

802.50
801.15

From: [REDACTED]
To: mverne@nc.gov <mverne@nc.gov>
Date: 7/31/02 11:08AM
Subject: Size of Transaction Question

Thanks for answering my question the other day on the joint venture issue. On an unrelated matter, I had another question: In determining the size of transaction for an asset acquisition where the assets being acquired are comprised of assets both in the US and outside the US, is it only the value of the US assets which is counted towards the \$50 million threshold or all assets worldwide?

Thanks again.

[REDACTED]

07/31/02 10:07:22-----

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THE FOREIGN ASSETS MUST BE ANALYZED UNDER 802.50. IF THEY HAVE GENERATED LESS THAN \$50MM IN SALES INTO THE U.S. THEN THEY ARE EXEMPT AND ARE NOT INCLUDED IN DETERMINING THE SIZE OF TRANSACTION.

B. Michael Verne
7/31/02