



March 25, 1991

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FEDERAL TRADE COMMISSION
OFFICE

VIA FEDERAL EXPRESS

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 Hart-Scott-Rodino Antitrust Improvement Act of 1976 and the regulations thereunder

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.

Very truly yours,

[Redacted signature]

[Redacted text]

3/26/91 - advised [Redacted] that,
assuming the sub. bank transaction is reportable
neither the acquiring person [Redacted]
nor the acquired person [Redacted]
[Redacted] meet the
100 NM size of person test. As such,
no reportable transaction between such
parties can take place. The financials
are less than 15 months old prior to the
date on which the proposed acquisition
will take place.