

[REDACTED]

Writer's Direct Dial Number

[REDACTED]

August 20, 1991

This material may be subject to the confidentiality provision of Section 7A (b) of the Clayton Act which restricts release under the Freedom of Information Act

Ms. Nancy Ovuka  
Premerger Notification Office  
Bureau of Competition  
Room 303  
Federal Trade Commission  
Washington, D.C. 20580

Dear Ms. Ovuka:

This is to confirm our conversation of August 19, 1991 in which you stated that the following transaction was not reportable under the Hart-Scott-Rodino Act. The acquisition we discussed was the purchase of realty by a retirement system. The seller is a bank. The realty does contain improvements, however, the acquisition is only of the underlying realty. The retirement system holds several other properties, and the sale of the realty does not constitute a sale of all or substantially all of the seller's assets. You concluded that this transaction is an acquisition of realty in the ordinary course of business, and is therefore exempt from the reporting requirements of Hart-Scott-Rodino. 16 C.F.R. §802.1.

Please let me know if my understanding is incorrect. My number is [REDACTED]  
Thank you for your assistance.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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FEDERAL TRADE COMMISSION

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