

Gillis, Diana L.

From: Gillis, Diana L.
Sent: Monday, June 29, 2015 11:56 AM
To: [REDACTED]; Walsh, Kathryn E.; Whitehead, Nora
Subject: RE: 802.50/802.51/801.11(c) Revenues Question

Hi Sydney,

You use the last fiscal year, whether or not they have been finalized into annual statements or not. So if the fiscal year ends tomorrow, that's the relevant year.

-Diana

From: [REDACTED]
Sent: Monday, June 29, 2015 10:30 AM
To: Walsh, Kathryn E.; Whitehead, Nora; Gillis, Diana L.
Subject: 802.50/802.51/801.11(c) Revenues Question

Hi all,

I hope everyone enjoyed the beautiful weather yesterday! This is hopefully an easy question for you and I can't believe I haven't come across it before but if I have I can't find it. With respect to the annual revenues for 802.50 and 802.51, I think you use the definition of revenues in 801.11(c), "The annual net sales of a person shall be as stated on the last regularly prepared annual statement of income and expenses". For example, a target with a 6/30 FYE that had sales in and into US from its foreign assets of less than \$76.3 million could rely on those revenues until it's next annual statement of income/expenses is available.

Many thanks,

[REDACTED]

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