

From: [Storm, Evan](#)
To: [REDACTED]
Subject: RE: Question re 801.10
Date: Thursday, June 02, 2016 12:16:00 PM
Attachments: [image001.jpg](#)

[REDACTED]

Since B's capital expenditures were already made prior to the current transaction, A's reimbursement payment to B cannot be excluded from the purchase price.

Regards
Evan

From: [REDACTED]
Sent: Tuesday, May 31, 2016 12:55 PM
To: Storm, Evan
Subject: RE: Question re 801.10

Hi Evan,

Thanks again for your guidance on the fact pattern below. I have one more question on this issue.

As part of the acquisition of the 50% interest in C, A will also reimburse B for 50% of certain of C's capital expenditures already made by B. Informal interpretation 1209011 suggests that we could exclude this reimbursement from the size of transaction, but it would be great if you could confirm.

Thanks,

[REDACTED]

[REDACTED]

[REDACTED]

From: Storm, Evan [<mailto:estorm@ftc.gov>]
Sent: Tuesday, May 24, 2016 10:13 AM
To: [REDACTED]
Subject: RE: Question re 801.10

[REDACTED]

[REDACTED]

[REDACTED]