## Haynes, Lanea

From: Storm, Evan

**Sent:** Friday, May 12, 2017 2:15 PM

To:

**Cc:** Shaffer, Kristin; Carson, Timothy; Whitehead, Nora; Gillis, Diana L.

**Subject:** RE: Question regarding option exercise

We agree that the shares would be valued at the "Market Price." Regards Evan

From:

Sent: Friday, May 12, 2017 7:43 AM

To: Storm, Evan

Subject: Question regarding option exercise

Evan, if an optionholder plans to make a *cashless* exercise (as in the second part of interpretation #1704001), can you confirm that if the optionholder retains some or all of the shares (as opposed to selling all on the same day), then such newly-acquired shares would be valued at the "Market Price" (pursuant to 801.10(c)(1), since the "acquisition price" is \$0), and <u>not</u> the current trading price?

