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Act	33
Section	4(1)
Rule	144
Public Availability	5-18-72

Richard L. Kahn, Esq.
Fischel, Kahn, Weinberg & Brusslan
111 West Monroe Street
Chicago, Illinois 60603

APR 18 1972

Re: Weiman Co., Inc.

Dear Mr. Kahn:

This will refer to your letter of March 14, 1972 requesting an interpretation of the availability of Rule 144 under the Securities Act of 1933 ("the Act") for the sale by Mr. Julius E. Lohm of 67,367 shares of the common stock of Weiman Co., Inc. acquired before the effective date of the rule.

As you note in your letter, Securities Act Release No. 5223 which gives notice of the adoption of Rule 144 states that non-controlling persons who acquired restricted securities prior to April 15, 1972, the effective date of the rule, will have the choice of complying with the new rule or the administrative interpretations in effect at the time of resale. Therefore, if he complies with the provisions of Rule 144, Mr. Lohm may sell restricted stock pursuant to the rule despite the fact that the stock in question was acquired prior to April 15, 1972. In this connection your attention is directed to the provisions of Rule 144(d)(4)(C) to the extent that such subparagraph may be applicable to the determination of Mr. Lohm's holding period.

Since the staff's informal advice regarding Rule 144 will be limited to interpretative letters to assist persons in complying with the new rule and will not extend to the issuance of no-action letters with respect to proposed resales under the rule, we decline to give an opinion as to whether Mr. Lohm's specific factual situation will result in resales in compliance with the provisions of the rule.

Sincerely yours,

John Heneghan
Deputy Chief Counsel