

Washington Service Bureau, Inc.	
Letter:	Alaska Gold & Oil
WSB Division #:	33-744
File # within division:	197
Letter also listed in file	
guide under division(s):	
Availability date:	3-19-75

ACT	33
Section	
Rule	144(a)
Public Availability	3-19-75

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Leonard A. Weinberger, Esq.  
 125010 Queens Blvd.  
 Kew Gardens, New York 11415

Re: Alaska Gold & Oil Corp.

Dear Mr. Weinberger:

This is with reference to your letter of January 13, 1975, concerning the holding period for restricted securities pursuant to Rule 144 under the Securities Act of 1933.

You state that on October 1, 1974, you acquired 20,000 shares of Alaska Gold & Oil Corp. common stock as partial payment for a debt of long standing. You inquire as to whether you may tack the period of time these shares were held by your debtor to the date of your acquisition for the purpose of establishing the two year holding period requirement of Rule 144.

The tacking of holding periods is allowed for certain pledged securities pursuant to subparagraph (d)(4)(C) of the rule. However, notwithstanding that securities were acquired in satisfaction of a debt, where such securities were not collateral for an obligation, the securities shall be deemed to have been acquired when they were acquired by the creditor.

Accordingly, on the basis of the facts presented, this Division is unable to conclude that you may tack the period of time during which your debtor held the shares prior to your acquisition for the purpose of meeting the holding period requirements of Rule 144(d).

Sincerely,

MCL

Mark L. Lezell  
 Attorney Adviser