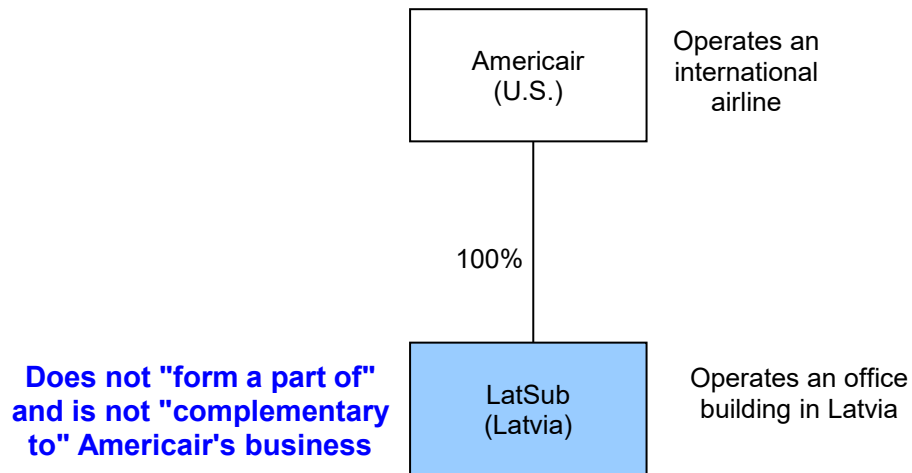


**Latvia Treaty (1998)
Treasury Tech. Explan.,
Article 23, Paragraph 3,
Example 4**

**Latvian Office Building
Not Connected With
Airline Business**

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Limitation on benefits:

**Active trade or
business test
("derived in
connection with")**

Ameri Cair is a corporation resident in the United States that operates an international airline. LatSub is a wholly-owned subsidiary of Ameri Cair resident in Latvia. LatSub owns an office building in Latvia. No part of Ameri Cair's business is conducted through the office building. LatSub's business is not considered to form a part of or to be complementary to Ameri Cair's business. They are engaged in distinct trades or businesses in separate industries, and there is no economic dependence between the two operations.

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