

Sheinberg, Samuel I.

From: HSRHelp
Sent: Tuesday, August 24, 2021 9:59 AM
To: Walsh, Kathryn E.; Berg, Karen E.; Sheinberg, Samuel I.; Six, Anne; Whitehead, Nora; Shaffer, Kristin
Subject: FW: Item 6(a)

From: Musick, Vesselina <vmusick@ftc.gov>
Sent: Tuesday, August 24, 2021 9:59:07 AM (UTC-05:00) Eastern Time (US & Canada)
To: [REDACTED]
Cc: HSRHelp <HSRHelp@ftc.gov>
Subject: RE: Item 6(a)

[REDACTED]
For Item 6(a), you need to list the highest-level entities the natural person controls and all the entities within these highest-level entities, not just the directly held entities. You can exclude non-US entities that do not have US sales/assets as well as any entities with <\$10M assets.

Best,
Vesselina

Vesselina Musick

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From: HSRHelp <HSRHelp@ftc.gov>
Sent: Friday, August 20, 2021 10:02 AM
To: Walsh, Kathryn E. <kwalsh@ftc.gov>; Berg, Karen E. <KBERG@ftc.gov>; Sheinberg, Samuel I. <SSHEINBERG@ftc.gov>; Six, Anne <asix@ftc.gov>; Whitehead, Nora <nwhitehead@ftc.gov>; Musick, Vesselina <vmusick@ftc.gov>; Shaffer, Kristin <kshaffer@ftc.gov>
Subject: FW: Item 6(a)

From: [REDACTED]
Sent: Friday, August 20, 2021 10:00:36 AM (UTC-05:00) Eastern Time (US & Canada)
To: HSRHelp <HSRHelp@ftc.gov>
Subject: Item 6(a)

Dear PNO ~

I hope you're all staying well and healthy.

I know there have been some changes to interpreting the limitations on the 6(a) reporting requirement in the last year or two, so wanted to double check one thing: consistent with Item 4(b), is it correct to say that a natural person acquiring person may limit its response to the highest level entity(s) they control, directly controlled subsidiaries (that are US entities or foreign entities with US sales), the acquiring entity, and any controlled entities who generate US revenues in an overlapping code? (Recognizing also the <\$10 million asset limitation and the option to list all subsidiaries for simplicity.)

Thanks so much in advance for your help in navigating the rules. Even after 20 years I still have questions!

Best,

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]