

An incorporated city is a political subdivision  
& acquisitions to a firm are exempt if the

7A(C)(4)  
FOI. Rev.

incorporated or owned by a separate

corporation it would not be exempt

VIA FACSIMILE

February 15, 1995

Mr. Victor Cohen  
Premerger Notification Office  
Federal Trade Commission  
Washington, D.C.

Re: Application of Hart-Scott-Rodino Antitrust Improvements Act of 1976

Dear Victor:

The purpose of this letter is to confirm our telephone conversation of yesterday in which you stated that the Premerger Notification Office will consider the transaction outlined in this letter to be exempt from the notification requirements of the Hart-Scott-Rodino Antitrust

liabilities. Because the transaction involves a city, the conclusion that no filing is required is

restatement of the Premerger Notification Office's determination that this transaction between the city and the not-for-profit corporation is outside of the notification provisions of the Act.

Very truly yours,

[Redacted signature]

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