

I inquired whether an intraperson exemption might be available for this transaction based upon the relationship between Corporations C and A. I understand that the transaction should escape reporting requirements under Rule 801.1(c)(8), 16 CFR § 801.1(c)(8), which attributes to a person all assets and voting securities held by entities included within that person.

Please feel free to contact me if you have any further questions regarding this matter.

