

**UNITED STATES OF AMERICA
BEFORE THE**

3. Respondent ACT and the corporate entities under its control are, and at all times relevant herein have

7. Relevant geographic markets in which to analyze the effects of the Acquisition include ten local markets within the following cities: Aitkin, Hibbing, Minnetonka, Mora, Saint Paul, and Saint Peter in Minnesota, and Hayward, Siren, and Spooner in Wisconsin.

8. The relevant geographic markets for retail gasoline and retail diesel are highly localized, ranging up to a few miles, depending on local circumstances. Ea 5ioes()-2(es)t2(ah)-o(ah)dces. sac707

VII. VIOLATIONS CHARGED

12. The Acquisition, if consummated, would violate Section 7 of the Clayton Act, as amended, 15 U.S.C. § 18, and Section 5 of the FTC Act, as amended, 15 U.S.C. § 45.

The Equity Interest Purchase Agreement entered into by Holiday and Oliver Acquisition Corp. constitutes a violation of Section 5 of the FTC Act, as amended, 15 U.S.C. § 45.

IN WITNESS WHEREOF, the Federal Trade Commission, having caused this Complaint to be signed by the Secretary and its official seal affixed, at Washington, D.C., this fifteenth day of December, 2017, issues its Complaint against Respondents.

By the Commission.

Donald S. Clark
Secretary