

**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

**COMMISSIONERS:** **Maureen K. Ohlhausen, Acting Chairman**  
**Terrell McSweeney**

**In the Matter of:**

**AIR MEDICAL GROUP HOLDINGS, INC.**  
**a corporation;**

**KKR North America Fund XI (AMG) LLC**  
**a limited liability company,**

**and**

**AMR Holdco, Inc.,**  
**a corporation.**

**DOCKET NUMBER C-4642**

**COMPLAINT**

Pursuant to the provisions of the Federal Trade Commission Act and the Clayton Act, and its authority thereunder, the Federal Trade Commission ("Commission"), having reason to believe that Respondent Air Medical Group Holdings, Inc. has entered into a transaction with Respondent AMR Holdco, Inc.; C complaint, stating its charges as follows

**I. RESPONDENTS**

**AMGH**

1. Respondent Air Medical Group Holdings, Inc. ("AMGH") is a corporation organized, existing, and doing business under, and by virtue of, the laws of the State of Delaware, with its principal place of business located at 209 State Highway 121 Bypass, Suite 21, Lewisville, Texas 75067. Respondent AMGH's ultimate parent company is KKR North America Fund XI (AMG) LLC, located c/o Kohlberg Kravis Roberts & Co. LP, 9 West 57th Street, Suite 4200, New York, New York 10019.

2. Respondent AMGH is one of the largest providers of fair ambulance services in the United States, providing those services through a number of subsidiaries.

3. Respondent AMGH is and at all times relevant herein has been engaged in commerce, as "commerce" is defined in Section 1 of the Clayton Act, as amended, 15 U.S.C. § 12, and Section 4 of the FTC Act, as amended, 15 U.S.C. § 44.

4. Hawaii Life Flight Corporation ("HLF") is a corporation organized, existing, and doing business under, and by virtue of, the laws of Hawaii, with its principal place of business located at 150 Lagoon Drive, Honolulu, Hawaii 96819. HLF is a subsidiary of Respondent AMGH and provides inter-facility air ambulance transport services in the State of Hawaii.

5. HLF is, and at all times relevant herein has been engaged in commerce, as "commerce" is defined in Section 1 of the Clayton Act, as amended, 15 U.S.C. § 12, and Section 4 of the FTC Act, as amended, 15 U.S.C. § 44.

**KKR North America Fund XI (AMG) LLC**

6. Respondent KKR North America Fund XI (AMG) LLC ("KKR") , is a limited liability company organized, existing, and doing business under, and by virtue of, the laws of the State of Delaware, with its office and principal place of business located at Kohlberg Kravis Roberts & Co. LP at 9 West 57th Street, Suite 4200, New York, New York 10019. Respondent KKR is the ultimate parent company of Respondent AMGH.

7. Respondent KKR is, and at all times relevant herein has been engaged in commerce, as "commerce" is defined in Section 1 of the Clayton Act, as amended, 15 U.S.C. § 12, and Section 4 of the FTC Act, as amended, 15 U.S.C. § 44.

**AMR Holdco, Inc.**

8. Respondent AMR Holdco, Inc. ("AMR") is a corporation organized, existing, and doing business under, and by virtue of, the laws of the State of Delaware, with its principal place of business located at 6363 S. Fiddlers Green Circle, 14th Floor, Greenwood Village, CO 80111. Respondent AMR is i a suf (e f2us)-11p(aw)-2 (ar9aw)-2 (ar)-11 (e)]5.4 Tm ( )Tj EMC /P <</d

11. Respondent AMP and the corporate entities under its control are, and at all times

## **VI. EFFECTS OF THE MERGER**

18. The effects of the Proposed Acquisition, if consummated, may be substantially to lessen