

**ANALYSIS OF AGREEMENT CONTAINING
CONSENT ORDERS TO AID PUBLIC COMMENT**
In the Matter of Arko Holdings Ltd.
File No. 201-0041, Docket No. C-4726

0041(A)ntto. C(t)in 30 States and 22 TAs. Empire, a UIC Despe 76 D Wholesale Fuel 00 -2 Td ()[(T(t)-h (N), distribution, Empire is a “super jobber,” a company that supplies over one billion gallons of fuel each year. Empire has supply relationships with major oil companies, and distributes both branded and unbranded fuel. Empire supplies fuel to 1,555 retail sites, and operates 76 retail fuel and convenience stores itself.

III. The Proposed Acquisition

On December 17, 2019, GPM entered into an agreement to acquire certain retail and wholesale fuel assets from Empire and related entities (the “Acquisition”). With the Complaint,

