

Sheinberg, Samuel I.

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From: HSRHelp  
Sent: Wednesday, June 21, 2023 10:43 AM  
To: Walsh, Kathryn E.; Berg, Karen E.; Musick, Vesselina; Shaffer, Kristin; Sheinberg, Samuel I.; Six, Anne; Fetterman, Michelle  
Subject: FW: Intra-Person transfers and Rules 802.51/802.4

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From: Whitehead, Nora <nwhitehead@ftc.gov>  
Sent: Wednesday, June 21, 2023 10:42:42 AM (UTC-05:00) Eastern Time (US & Canada)  
To: [REDACTED]  
Cc: HSRHelp <HSRHelp@ftc.gov>  
Subject: RE: Intra-Person transfers and Rules 802.51/802.4

We agree.

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From: HSRHelp <HSRHelp@ftc.gov>  
Sent: Tuesday, June 20, 2023 7:22 AM  
To: Walsh, Kathryn E. <kwalsh@ftc.gov>; Berg, Karen E. <KBERG@ftc.gov>; Musick, Vesselina <vmusick@ftc.gov>; Shaffer, Kristin <

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manufactured products from a foreign manufacturer to a US controlled entity only to the extent the US entity then exports to foreign customers, to avoid double counting. Next, to determine if a filing were required, one would have to determine the fair market value of the US assets being acquired, under Rule 802.4.

Do you agree?

Thank you.

[Redacted]

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[Redacted]