

Sheinberg, Samuel I.

From: HSRHelp
Sent: Monday, August 12, 2024 2:02 PM
To: Walsh, Kathryn E.; Berg, Karen E.; Musick, Maccolina; Shaffer, Kristin; Sheinberg, Samuel I.; Six, Anne; Fetterman, Michelle; Burton, June; Larson, Peter
Subject: FW: Question re: Insurance Company Acquisitions

From: Whitehead, Nora <nwhitehead@ftc.gov>
Sent: Monday, August 12, 2024 2:01:20 PM (UTC-05:00) Eastern Time (US & Canada)
To: [REDACTED]
Cc: HSRHelp <HSRHelp@ftc.gov>
Subject: RE: Question re: Insurance Company Acquisitions

[REDACTED]

7Ac1 may indeed exempt the acquisition of a [REDACTED] issued to emphasize the point [REDACTED] analyzing 7Ac1 in the context of the acquisition of an insurance company must still value the non-exempt assets of the insurance company (in other words, a standard 802.4 [REDACTED]). The repealed interpretations did not clearly make th [REDACTED]

From: HSRHelp <HSRHelp@ftc.gov>
Sent: Monday, August 5, 2024 12:06 PM
To: Walsh, Kathryn E. <kwalsh@ftc.gov>; Berg, Karen E. <KBERG@ftc.gov>; Musick, Maccolina <MMUSICK@ftc.gov>; Shaffer, Kristin <kshaffer@ftc.gov>; Sheinberg, Samuel I. <SSHEINBERG@ftc.gov>; Six, Anne <asix@ftc.gov>; Whitehead, Nora <nwhitehead@ftc.gov>; Fetterman, Michelle <mfetterman@ftc.gov>; Burton, June <jburton@ftc.gov>; Larson, Peter <plarson@ftc.gov>
Subject: FW: Question re: Insurance Company Acquisitions

From: [REDACTED]
Sent: Monday, August 5, 2024 12:05:56 PM (UTC-05:00) Eastern Time (US & Canada)
To: HSRHelp <HSRHelp@ftc.gov>
Subject: Question re: Insurance Company Acquisitions

Hello!

I hope you are well and enjoying the summer.

I am looking at the application of the Section 7A(c)(1) exemption to insurance company acquisitions. Specifically, I am seeking to confirm whether this is still the PNO's position that the exemption continues to apply to both 7A(c)(1) and Rule 802.4 if the acquisition is an equity transaction.

I saw that this interpretation is no longer the PNO's position: <https://www.ftc.gov/legal-library/browse/hsr-informal-interpretations/1412009>. (along with the other informal interpretations cited here: <https://www.ftc.gov/legal-library/browse/hsr-informal-interpretations/0904010> and <https://www.ftc.gov/legal-library/browse/hsr-informal-interpretations/0904006>).

