



UNITED STATES OF AMERICA  
**FEDERAL TRADE COMMISSION**  
WASHINGTON, D.C. 20580

Office of the Secretary

October 28, 2013

Mills-Peninsula Medical Group, Inc.  
c/o Jesse W. Markham, Jr., Professor  
University of San Francisco School of Law  
2130 Fulton Street  
San Francisco, CA 94117

Re: Palo Alto Foundation Medical Group/Mills-Peninsula Medical Group  
FTC File No. 101 0056

Dear Prof. Markham:

The Federal Trade Commission's Western Region Office has been conducting a nonpublic investigation to determine whether the acquisition of assets from Mills-Peninsula Medical Group by Sutter Health, Palo Alto Medical Foundation, or any of their affiliates, violates Section 5 of the Federal Trade Commission Act, as amended, 15 U.S.C. § 45, or Section 7 of the Clayton Act, as amended, 15 U.S.C. § 18.

Upon further review of this matter, it now appears that no further action is warranted by the Commission at this time. Accordingly, the investigation has been closed. This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

By direction of the Commission.

Donald S. Clark  
Secretary