

Sheinberg, Samuel I.

From: [REDACTED]
Sent: Friday, November 22, 2019 5:04 PM
To: Walsh, Kathryn E.; Berg, Karen E.; Sheinberg, Samuel I.; Six, Anne; Whitehead, Nora; Musick, Vesselina
Subject: FW: Item 7

From: Carson, Timothy
Sent: Friday, November 22, 2019 5:04:14 PM (UTC-05:00) Eastern Time (US & Canada)
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Item 7

Just the States in which the Company actually conducts operations itself through its own employees.

From: [REDACTED]
Sent: Friday, November 22, 2019 3:20:17 PM (UTC-05:00) Eastern Time (US & Canada)
To: [REDACTED]
Subject: Item 7

Dear All:

I am preparing a filing in which there is an overlap in a few NAICS codes.

For Item 7 purposes, in listing the states in which we conduct operations, should we be listing States in which independent contractors/ registered representatives generate revenue, even though they are not company employees or should we list just the States in which the Company actually conducts operations itself through its own employees? PNPM #201, concerning insurance agents takes the position that the response should list only states where the insurance company has offices, not where agents live.

Thank you.

[REDACTED]

[REDACTED]