

Sheinberg, Samuel I.

From: HSRHelp
Sent: Monday, March 31, 2025 11:02 AM
To: HSR Auto Forward List
Subject: FW: HSR Informal Advice - Select 801.30 Transactions

From: Musick, Vesselina
Sent: Monday, March 31, 2025 11:02:07 AM (UTC-05:00) Eastern Time (US & Canada)
To: [REDACTED]
Cc: HSRHelp
Subject: RE: HSR Informal Advice - Select 801.30 Transactions

A transaction involving open market purchases by a natural person of voting securities of a company for which he sits on the Board does not qualify as a select 801.30 transaction.

Kind regards.

Vesselina Musick

[REDACTED]

From: [REDACTED]
Sent: Wednesday, March 26, 2025 2:46:28 PM (UTC-05:00) Eastern Time (US & Canada)
To: HSRHelp
Cc: [REDACTED]
Subject: HSR Informal Advice - Select 801.30 Transactions

[REDACTED]

Hello,

We are writing to inquire with regards to guidance published to the HSR Form Changes Q&A page of the FTC's website on March 20, 2025.

Under the heading "Qualifying as a Select 801.30 (03/20/25)" the Commission stated that the following two scenarios do not qualify as Select 801.30s:

The buyer is acquiring voting securities on the open market and has a representative on the target's board.

An investor is acquiring additional voting securities and currently has a representative on the target's board but has no continuing right to appoint another board member in the event that the current representative resigns.

Could you please confirm that the above guidance does not apply to a natural person, *e.g.*, an individual buying voting securities on the open market of a Company for which he sits on the Board, if such transaction otherwise qualifies as a Select 801.30 transaction? We are available to discuss if useful.

Thank you and kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]