

**Sheinberg, Samuel I.**

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**From:** HSRHelp  
**Sent:** Monday, March 24, 2025 3:34 PM  
**To:** HSR Auto Forward List  
**Subject:** FW: Question re Defense/Intelligence Contracts

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**From:** Walsh, Kathryn E.  
**Sent:** Monday, March 24, 2025 3:34:20 PM (UTC-05:00) Eastern Time (US & Canada)  
**To:** [REDACTED]  
**Cc:** HSRHelp  
**Subject:** FW: Question re Defense/Intelligence Contracts

Only direct contracts with relevant defense and intelligence agencies must be disclosed.

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**From:** [REDACTED]  
**Sent:** Tuesday, March 18, 2025 3:22:32 PM (UTC-05:00) Eastern Time (US & Canada)  
**To:** HSRHelp  
**Subject:** Question re Defense/Intelligence Contracts

[REDACTED]  
Hi all.

I have a question about application of the new requirement for disclosure of details around certain defense and intelligence agency contracts.

My initial question on this topic is, does the new requirement apply only to direct contracts with relevant defense and intelligence agencies, or does it also apply in situations where the supplier has no contract with the government but instead contracts with the entity which in turn actually has the government contract?

I represent a large supplier of IT and networking hardware and software. Their products are ubiquitous, and are used across pretty much all industries and all functions of government. Although they are a prime contractor to certain government agencies on certain contracts (some of them classified), a great deal of what they sell to government (maybe even most) is sold indirectly through distributors and resellers (including, but not limited to, via IDIQ contracts to list systems/parts/etc. on the GSA schedule), and over time an amount exceeding \$100 million may be purchased in this fashion by relevant defense and intelligence agencies. However, in such situations my client does not have a contract directly with any defense or intelligence agency for these sales, and will often not have the relevant details/data necessary to provide a response to the new HSR requests relating to such sales. As such, any further guidance on this question would be much appreciated.

Thanks for your help.

Best,

[REDACTED]  
[REDACTED]  
[REDACTED]

