

Sheinberg, Samuel I.

From:
Sent: Thursday, May 16, 2019 9:54 AM
To: Walsh, Kathryn E.; Berg, Karen E.; Biagioli, Kimberley; Carson, Timothy; Sheinberg, Samuel I.; Six, Anne
Subject: FW: Question Regarding Item 6(a)

From: Whitehead, Nora
Sent: Thursday, May 16, 2019 9:54:07 AM (UTC-05:00) Eastern Time (US & Canada)
To:
Cc:
Subject: RE: Question Regarding Item 6(a)

The language in the instructions pertaining to Item 6a is meant to reflect the same test that we use for the foreign exemptions. If the UPE controls foreign entities with any sales into the US (even intracompany sales), then those entities must be listed in

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