ID: CCA 2018102507104743

UILC: 6112.01-00

Number: **201906005** Release Date: 2/8/2019

From:

Sent: Friday, February 08, 2019 10:30:49 AM

To: Cc: Bcc:

Subject: RE: IRC 6112 List Request Question

Oops, there was a typo in my earlier email. It should read as follows.

Based on the information that the advisor provided, it does **not** meet the fee threshold to be considered a material advisor under section 6111, therefore, it does not need to provide information pursuant to section 6112 with regard to this transaction.