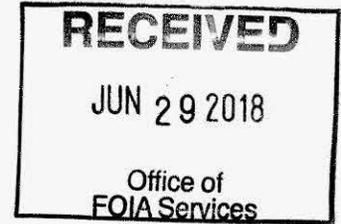


foiapa

From: Request@ip-10-170-25-246.ec2.internal
Sent: Friday, June 29, 2018 1:05 PM
To: foiapa
Subject: Request for Document from Schowalter, Brenda

Brenda Schowalter
5319 UNIVERSITY DR STE 307
IRVINE, California 92612
United States

9494405402
bschowalter@palagonpartners.com



Request:
COMP_NAME: Ungermann-Bass, Inc. S-1
DOC_DATE: May 10, 1983
FILE_NUM: 2-83651
TYPE: Other (fully describe)
COMMENTS: S-1 document that was filed for Ungermann-Bass going public (ticker symbol was UNGR)
FEE_AUTHORIZED: Willing to Pay \$61
FEE_WAIVER_REQUESTED: NO
EXPEDITED_SERVICE_REQUESTED: NO



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
STATION PLACE
100 F STREET, NE
WASHINGTON, DC 20549-2465

Office of FOIA Services

August 9, 2018

Ms. Brenda Schowalter
Palagon Partners LLC
5319 University Dr., Ste. 307
Irvine, CA 92612

RE: Freedom of Information Act (FOIA), 5 U.S.C. § 552
Request No. **18-02335-FOIA**

Dear Ms. Schowalter:

This letter is in response to your request, dated and received in this office on June 29, 2018, for the Form S-1 dated May 10, 1983 for Ungermann-Bass, Inc., SEC File No. 2-83651.

By e-mail dated July 24, 2018, you inquired about the status of this request. On the same date, I advised you that the records you were seeking were requested from our Records Management Branch with an estimated delivery date to the Office of FOIA Services of August 6, 2018.

On July 25, 2018, I advised you in an e-mail message that additional records were located that may be responsive to your request. In your reply to that message on the same date, you stated that you were only interested in a "copy of the front page of the Ungermann-Bass Inc. S-1, dated May 10, 1983, that shows the initial price and logo on the cover."

The search for responsive records has resulted in the retrieval of 2 pages of records that may be responsive to your request. The best available version of the records is being provided to you with this letter.

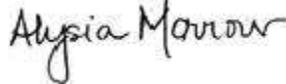
As shown on the enclosed invoice, the processing fee is \$61.00 in accordance with our fee schedule. You may use our [Online Payment](#) option to pay by debit or credit card. If paying by mail, checks or money orders should be made payable to the SEC and a copy of the invoice should be mailed to our payment address: Enterprise Services Center, HQ Bldg., Room 181, AMZ-341, 6500 South MacArthur Boulevard, Oklahoma City, OK 73169. Please refer to the following link for detailed instructions on how to remit payments. <http://www.sec.gov/about/offices/ofm.htm>

Ms. Brenda Schowalter
August 9, 2018
Page Two

18-02335-FOIA

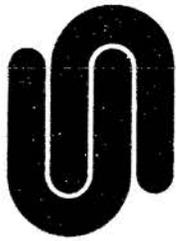
If you have any questions, please contact me at morrowa@sec.gov or (202) 551-8376. You may also contact me at foiapa@sec.gov or (202) 551-7900. You also have the right to seek assistance from Jeffery Ovall as a FOIA Public Liaison or contact the Office of Government Information Services (OGIS) for dispute resolution services. OGIS can be reached at 1-877-684-6448 or Archives.gov or via e-mail at ogis@nara.gov.

Sincerely,

A handwritten signature in black ink that reads "Alysia Morrow". The signature is written in a cursive style with a large initial "A".

Alysia Morrow
FOIA Research Specialist

Enclosures



Ungermann-Bass, Inc.

2,300,000 Shares

Common Stock

Of the shares offered hereby, 1,700,000 shares are being sold by Ungermann-Bass, Inc. ("Ungermann-Bass" or the "Company") and 600,000 shares by the Selling Shareholders. See "Principal and Selling Shareholders."

Prior to this offering, there has been no public market for the Common Stock, \$.01 par value ("Common Stock"), of the Company. It is currently anticipated that the initial public offering price will be between \$16.00 and \$18.00 per share. See "Underwriting" for a discussion of factors considered in determining the offering price.

**THESE SECURITIES HAVE NOT BEEN APPROVED OR DISAPPROVED BY THE
SECURITIES AND EXCHANGE COMMISSION NOR HAS THE COMMISSION
PASSED UPON THE ACCURACY OR ADEQUACY OF THIS PROSPECTUS.
ANY REPRESENTATION TO THE CONTRARY IS A CRIMINAL OFFENSE.**

	Price to Public	Underwriting Discounts and Commissions (1)	Proceeds to Company (2)	Proceeds to Selling Shareholders (2)
Per Share	\$	\$	\$	\$
Total (3)	\$	\$	\$	\$

- (1) For information regarding indemnification of the Underwriters, see "Underwriting."
- (2) Before deducting expenses payable by the Company, estimated at \$, and payable by the Selling Shareholders, estimated at \$.
- (3) The Company has granted the Underwriters an option to purchase up to 230,000 additional shares of Common Stock solely to cover over-allotments, if any. See "Underwriting." If such option is exercised in full, the total Price to Public, Underwriting Discounts and Commissions and Proceeds to Company will be \$, \$, and \$, respectively.

The shares are offered by the Underwriters as stated herein, subject to receipt and acceptance by them and subject to their right to reject any order in whole or in part. It is expected that certificates for such shares will be ready for delivery on or about , 1983.

Robertson, Colman & Stephens

Alex. Brown & Sons

The date of this Prospectus is , 1983.

A registration statement relating to these securities has been filed with the Securities and Exchange Commission and has not yet become effective. Complete information concerning this offering can be obtained only by reading the registration statement. These securities may not be sold in any state in which they are not registered. The prospectus should not be distributed in any state in which it is not registered. The prospectus should not be distributed in any state in which it is not registered. The prospectus should not be distributed in any state in which it is not registered.

NEW REGISTRANT

U 136950

ORIGINAL
H 20-944

As filed with the Securities and Exchange Commission on May 10, 1983

Registration No. 2-351

1140

SECURITIES AND EXCHANGE COMMISSION
Washington, D. C. 20549

Form S-1
REGISTRATION STATEMENT
Under
THE SECURITIES ACT OF 1933

UNGERMANN-BASS, INC.

(Exact name of registrant as specified in its charter)



SIC
3573

California
(State or other jurisdiction
of incorporation or organization)

3573
(Primary Standard Industrial
Classification Code Number)

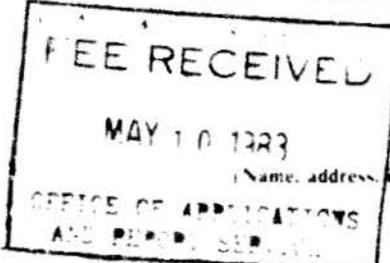
94-2589236
(E.R.S. Employer
Identification No.)

2560 Mission College Boulevard
Santa Clara, California 95050
(408) 496-0111

(Address, including zip code, and telephone number, including area code, of registrant's principal executive offices)

THOMAS W. HUBBS
Vice President-Finance & Administration
UNGERMANN-BASS, INC.
2560 Mission College Boulevard
Santa Clara, California 95050
(408) 496-0111

(Name, address, including zip code, and telephone number, including area code, of agent for service)



Copies to:

L.F.F. BENTON, Esq.
GEORGE H. HOHNSBEEN II, Esq.
ANTHONY G. STAYNER, Esq.
Cooley, Godward, Castro,
Huddleson & Tatum
Five Palo Alto Square
Palo Alto, California 94306

JOHN W. LARSON, Esq.
JOSHUA L. GREEN, Esq.
Brobeck, Phleger & Harrison
One Market Plaza
San Francisco, California 94105

Approximate date of commencement of proposed sale to the public: As soon as practicable after this Registration Statement becomes effective.

If any of the securities being registered on this Form are to be offered on a delayed or continuous basis pursuant to Rule 415 under the Securities Act of 1933, check the following box

CALCULATION OF REGISTRATION FEE

Title of Each Class of Securities to be Registered	Amount to be Registered (1)	Proposed Maximum Offering Price Per Share (2)	Proposed Maximum Aggregate Offering Price (2)	Amount of Registration Fee
Common Stock (par value \$0.1)	2,530,000 shs	\$18.00	\$45,540,000	\$9,108

(1) Includes 230,000 shares that the Underwriters have the option to purchase to cover over-allotments, if any

(2) Estimated solely for the purpose of calculating the amount of the registration fee

The Registrant hereby amends this Registration Statement on such date or dates as may be necessary to delay its effective date until the Registrant shall file a further amendment which specifically states that this Registration Statement shall thereafter become effective in accordance with Section 8(a) of the Securities Act of 1933 or until the Registration Statement shall become effective on such date as the Commission, acting pursuant to said Section 8(a), may determine.