

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
) **Criminal No.: 96-232**
 v.)
) **Filed: [5/30/96]**
A&L MAYER ASSOCIATES, INC.)
) **15 U.S.C. § 1**
 Defendant.)
) **Judge: Dalzell**

INFORMATION

The United States of America, acting through its attorneys,
charges:

I

DESCRIPTION OF THE OFFENSE

1. A&L Mayer Associates, Inc. (Mayer Associates), is made
a defendant on the charge stated below.

2. Beginning at least as early as January 1990 and
continuing thereafter to at least April 1995, the exact dates
being unknown to the United States, defendant Mayer Associates
and co-conspirators entered into and participated in a
combination and conspiracy to suppress and eliminate competition
for the sale of tampico fiber in the United States in
unreasonable restraint of interstate and foreign trade and
commerce.

3. The charged combination and conspiracy consisted of a
continuing agreement, understanding and concert of action among
the defendant and co-conspirators, the substantial terms of which
were to fix the prices and allocate sales of tampico fiber
imported into and sold in the United States.

4. For the purpose of forming and carrying out the charged combination and conspiracy, the defendant and co-conspirators did the following:

(a) discussed and agreed on prices at which tampico fiber was imported into the United States;

(b) discussed and agreed on the resale prices at which United States distributors were to sell tampico fiber; and

(c) discussed and agreed to allocate the volume of sales between United States tampico fiber distributors.

II

DEFENDANT AND CO-CONSPIRATORS

5. Mayer Associates is a corporation organized and existing under the laws of Liberia and with offices in The Netherlands, Mexico, and Hartsdale, New York.

6. Various individuals and corporations, not made defendants herein, participated as co-conspirators in the offense charged and performed acts and made statements in furtherance thereof.

7. Whenever in this information reference is made to any act, deed or transaction of a corporation, the allegation means that the corporation engaged in the act, deed or transaction by or through its officers, directors, agents, employees or other representatives while they were actively engaged in the management, direction, control or transaction of its business or affairs.

III

TRADE AND COMMERCE

8. Tampico fiber is a natural vegetable fiber produced by the lechuguilla plant and grown in the deserts of northern Mexico. It is harvested, processed, finished and exported worldwide, including into the United States. It is used as filling material in the production of consumer and industrial brushes.

9. During the period covered by this information, the defendant and co-conspirators shipped or caused to be shipped a substantial quantity of the tampico fiber which is the subject of this information from Mexico to United States distributors for resale to customers throughout the United States. The defendant and co-conspirators also sent or caused to be sent across state lines and into foreign countries payments for the aforesaid tampico fiber.

10. During the period covered by this information, the activities of the defendant and co-conspirators that are the subject of this information were within the flow of, and substantially affected, interstate and foreign trade and commerce.

IV

JURISDICTION AND VENUE

11. The combination and conspiracy charged in this information was carried out, in part, within the Eastern District of Pennsylvania, within the five years preceding the filing of this information.

ALL IN VIOLATION OF TITLE 15, UNITED STATES CODE, SECTION 1.

Dated:

_____/s/_____
ANNE K. BINGAMAN
Assistant Attorney General

_____/s/_____
EDWARD S. PANEK

_____/s/_____
GARY R. SPRATLING
Deputy Assistant Attorney General

_____/s/_____
MICHELLE A. PIONKOWSKI

_____/s/_____
ROBERT E. CONNOLLY
Chief, Middle Atlantic Office

_____/s/_____
ROGER L. CURRIER

_____/s/_____
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