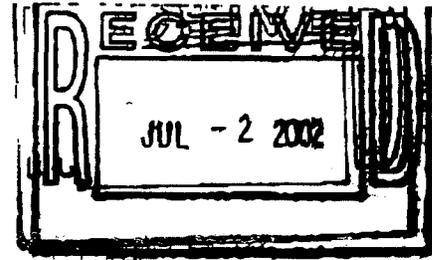


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July 1, 2002

Charles A. James, Assistant Attorney General  
Department of Justice  
Antitrust Division  
950 Pennsylvania Avenue, NW,  
Washington, DC 20530

Re: Brochem Marketing, Inc.  
Application for a Business Review Letter Concerning A Proposed Chemical  
Information System for use by Chemical Distributors.

Dear Mr. James:

The undersigned, on behalf of Brochem Marketing, Inc. ("Brochem"), requests a statement by the Department of Justice of its present enforcement intentions with respect to a proposed Chemical Information System which provides information provided by chemical producers via a computer database to Chemical Distributors. This request is made pursuant to the Department's regulations governing the procedures for the issuance by the Antitrust Division of business review letters, 28 C.F.R. § 50.6. The facts upon which this request is based are set forth below and operative documents are enclosed.

Brochem is proposing to develop a Chemical Information System ("System"), using information provided by chemical producers, that it wishes to make available to chemical distributors for use in marketing chemical products. The information contained in this system will be organized in such a way as to make it easier for the chemical distributor, and especially the distributor salespeople, to do business with a particular chemical producer through making information regarding such producer's products readily available through a computer database.

The System will allow users easy access to all producer information in a consistent manner. It is designed to eliminate a large percentage of telephone calls from distributors to producers. It is designed to allow more time for both the chemical producer and chemical distributor to focus on the end-use customer and to give distributor salespeople the ability to concentrate their efforts on the features and benefits of various producer products.

For both the chemical distributor and chemical producer, it will drive out redundant and repetitive work and will bring unprecedented levels of cooperation and sharing of

information that is not competitive in nature. It is a system that delivers the same information on a producer's product line to a producer's entire distributor network at the same time.

For chemical producers, who will be charged a fee by Brochem to make their information available to their authorized distributors, it places emphasis on the real purpose of the distribution channel, assisting the end-use customer in acquiring the products they need for their businesses.

For chemical distributors with chemical producer lines too numerous to count and products in the tens of thousands, it creates order where chaos reigns. It brings organization and organizational skills to what is an abundance of information, especially for the new employees. Distributors will be charged a subscription fee to access information from those chemical producers whose products they are authorized by that producer to distribute.

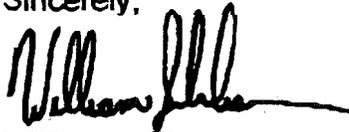
This System will have a tendency to increase competition between distributors and between competing manufacturer product lines, especially as the smaller regional distributors, with smaller staffs, will have access to the same information, and more accurate information, as the larger distributors who are currently able to more readily accumulate such information.

Attached please find a summary of the information Brochem proposes to include in the System.

Expedited treatment of this request for a business review letter is respectfully requested. Brochem and a number of Producers and Distributors desire to begin negotiation for the development and provision of the System as soon as possible.

Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "William Jibilian", with a long horizontal flourish extending to the right.

William Jibilian

Enclosures