

1 NIAL E. LYNCH (CSBN 157959)  
LIDIA SPIROFF (CSBN 222253)  
2 SIDNEY A. MAJALYA (CSBN 205047)  
LARA M. KROOP (CSBN 239512)  
3 Antitrust Division  
U.S. Department of Justice  
4 450 Golden Gate Avenue  
Box 36046, Room 10-0101  
5 San Francisco, CA 94102  
Telephone: (415) 436-6660  
6  
7 Attorneys for the United States

ORIGINAL FILED  
E-filing  
MAR 14 AM 9:35  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA  
12 v.  
13 AKZO NOBEL CHEMICALS  
INTERNATIONAL B.V.,  
14 Defendant.  
15

CR 06 0160  
No. CR

JSW

INFORMATION  
VIOLATION:  
Title 15, United States Code,  
Section 1 (Price Fixing)  
San Francisco Venue

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

17 I.

18 DESCRIPTION OF THE OFFENSE

- 19 1. AKZO NOBEL CHEMICALS INTERNATIONAL B.V. is made a defendant on  
20 the charge stated below.
- 21 2. Beginning on or about July 1, 1998 and continuing until on or about December 1,  
22 2001, the defendant and coconspirators participated in a combination and conspiracy to suppress  
23 and eliminate competition by fixing the price of hydrogen peroxide sold in the United States and  
24 elsewhere. The combination and conspiracy engaged in by the defendant and coconspirators was  
25 in unreasonable restraint of interstate and foreign trade and commerce in violation of Section 1 of  
26 the Sherman Act (15 U.S.C. § 1).



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

5   III.

6   TRADE AND COMMERCE

7           8.       Hydrogen peroxide is a chemical compound with strong oxidizing properties that  
8 is widely used as a bleaching agent. The same household chemical commonly used as a  
9 disinfectant for cuts and scrapes, hydrogen peroxide also has multiple industrial uses, including  
10 applications in the electronics, energy production, mining, cosmetics, food processing, textiles,  
11 and pulp and paper manufacturing industries.

12          9.       During the period covered by this Information, the defendant and coconspirators  
13 manufactured, sold, and distributed hydrogen peroxide in a continuous and uninterrupted flow of  
14 interstate and foreign trade and commerce to customers located in states or countries other than  
15 the states or countries in which the defendant and coconspirators produced hydrogen peroxide.

16          10.      The business activities of the defendant and coconspirators that are the subject of  
17 this Information were within the flow of, and substantially affected, interstate trade and  
18 commerce.

19   IV.

20   JURISDICTION AND VENUE

21          11.      The combination and conspiracy charged in this Information was carried out, in  
22 part, in the Northern District of California within the five years preceding the filing of this  
23 Information.

24      ///

25      ///

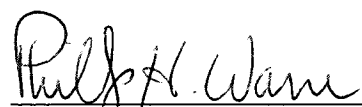
26      ///

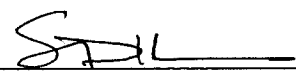
1 ALL IN VIOLATION OF TITLE 15, UNITED STATES CODE, SECTION 1.

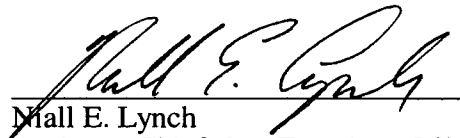
2 Dated: March 14, 2006


3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

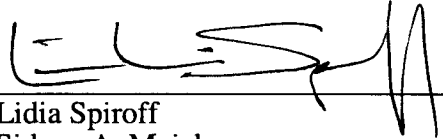
~~THOMAS BARNETT~~ / SDH  
Thomas O. Barnett  
Assistant Attorney General

  
Phillip H. Warren  
Chief, San Francisco Office

  
Scott D. Hammond  
Deputy Assistant Attorney General

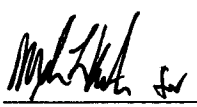
  
Mall E. Lynch  
Assistant Chief, San Francisco Office

  
Marc Siegel  
Director of Criminal Enforcement

  
Lidia Spiroff  
Sidney A. Majalya  
Lara M. Kroop  
Trial Attorneys

United States Department of Justice  
Antitrust Division

United States Department of Justice  
Antitrust Division  
450 Golden Gate Avenue  
Box 36046, Room 10-0101  
San Francisco, CA 94102  
(415) 436-6660

  
Kevin V. Ryan  
United States Attorney  
Northern District of California