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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)	
)	
12 Plaintiff,)	Civil No. 81-0787 TJH
)	
13 v.)	Filed: February 17, 1981
)	
14 CROWN OIL CORPORATION;)	[Equitable Relief Complaint
15 GRANEX CORPORATION, U.S.A.; and)	for Violation of Section 1
PAN PACIFIC COMMODITIES,)	of the Sherman Act,
)	15 U.S.C. § 1]
16 Defendants.)	

17 COMPLAINT

18 The United States of America, plaintiff, by its attorneys,
19 acting under the direction of the Attorney General of the United
20 States, brings this civil action to obtain equitable relief against
21 the defendants named herein and complains and alleges as follows:

22 I

23 JURISDICTION AND VENUE

24 1. This complaint is filed and this action is instituted
25 under Section 4 of the Sherman Act (15 U.S.C. § 4), in order
26 to prevent and restrain the continuing violation by defendants,
27 as hereinafter alleged, of Section 1 of the Sherman Act
28 (15 U.S.C. § 1).

<u>Corporation</u>	<u>State of Incorporation</u>	<u>Principal Place of Business</u>
Crown Oil Corporation	Nevada	San Francisco, California
Granex Corporation, U.S.A.	Delaware	San Francisco, California
Pan Pacific Commodities	California	Los Angeles, California (until February 1980) San Francisco, California (after February 1980)

5. Whenever in this complaint reference is made to any act, deed, or transaction of any defendant, such allegation shall be deemed to mean that such corporation engaged in such act, deed, or transaction by or through its officers, directors, agents, employees, or representatives while they were actively engaged in the management, direction, control, or transaction of its business or affairs.

IV

CO-CONSPIRATORS

6. Various entities and individuals, not made defendants herein, participated as co-conspirators in the violation alleged herein and performed acts and made statements in furtherance thereof.

V

TRADE AND COMMERCE

7. During the period of time covered by this complaint, Crown Oil Corporation, Granex Corporation, U.S.A. and Pan Pacific Commodities sold crude coconut oil in the United States to refiners, dealers, and end-users located in various states of the United States.

1 (a) to raise, fix, maintain and stabilize the
2 price of crude coconut oil in the United States;

3 (b) to purchase a quantity of crude coconut oil
4 sufficient to create an artificial shortage in the
5 United States;

6 (c) to refuse to sell said crude coconut oil to
7 purchasers in the United States, other than defendants or
8 their co-conspirators, for less than certain set prices;
9 and

10 (d) to store crude coconut oil in various storage
11 facilities in the United States until such time as the
12 market price increased to the desired levels.

13 13. In furtherance of the aforesaid combination and
14 conspiracy, the defendants and their co-conspirators have done,
15 within the jurisdiction of the United States, those things
16 which, as hereinbefore alleged they combined and conspired to
17 do, including, among other things, the following:

18 (a) discussed with each other the coordination of
19 pricing policies and marketing strategies with regard
20 to sales of crude coconut oil in the United States;

21 (b) exchanged information regarding shipments of
22 crude coconut oil and storage facilities;

23 (c) purchased large quantities of crude coconut
24 oil;

25 (d) relayed and implemented agreements reached
26 among officers, directors and members of United Coconut

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28 ///

1 Oil Mills, Inc. (UNICOM), a private Philippine corporation,
2 with regard to the purchase, sale and marketing of crude
3 coconut oil;

4 (e) stored large quantities of crude coconut
5 oil, jointly and individually, in various parts of
6 the United States;

7 (f) communicated the prices to be offered in
8 the United States for crude coconut oil;

9 (g) coordinated the sale and marketing of crude
10 coconut oil; and

11 (h) refused to sell crude coconut oil in the
12 United States for certain periods of time.

13 VII

14 EFFECTS

15 14. The combination and conspiracy alleged herein had
16 the following effects, among others:

17 (a) competition in the sale of crude coconut
18 oil in the United States has been suppressed;

19 (b) prices of crude coconut oil have been
20 fixed, maintained and stabilized; and

21 (c) refiners, dealers and end-users in the
22 United States have been deprived of the benefits of
23 free and open competition in the purchase of crude
24 coconut oil.

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26 ///

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28 ///

1 coconut oil except as necessary in connection with a
2 bona fide purchase or sales transaction between the
3 parties to such communications.

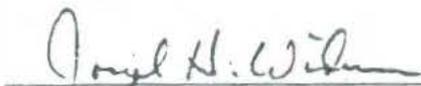
4 3. The plaintiff have such other relief as the Court
5 may deem just and proper.

6 4. The plaintiff recover the cost of this action.

7 Dated:

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10 Assistant Attorney General

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