

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

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