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RICHARD W. WIERLING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SI

CR 11 0653

13 UNITED STATES OF AMERICA

) No. CR

15 v.

) INFORMATION

) VIOLATION:

16 MAXZONE VEHICLE LIGHTING CORP.,

) Title 15, United States Code,  
) Section 1 (Price Fixing)

17 Defendant.

) San Francisco Venue

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

20 I.

21 DESCRIPTION OF THE OFFENSE

22 1. MAXZONE VEHICLE LIGHTING CORP. ("defendant") is made a defendant  
23 on the charge stated below:

24 2. From about April 2000 until about September 3, 2008, the defendant and its  
25 coconspirators entered into and engaged in a combination and conspiracy in the United States  
26 and elsewhere to suppress and eliminate competition by fixing the prices of aftermarket auto  
27 lights. The combination and conspiracy engaged in by the defendant and its coconspirators  
28 was an unreasonable restraint of interstate and foreign trade and commerce in violation of

1 Section 1 of the Sherman Act (15 U.S.C. § 1). The defendant knowingly joined and  
2 participated in the charged conspiracy from about April 2000 until about September 3, 2008.

3 3. The charged combination and conspiracy consisted of a continuing agreement,  
4 understanding, and concert of action among the defendant and its coconspirators, the  
5 substantial terms of which were to agree to fix the prices of aftermarket auto lights.

6 4. For the purpose of forming and carrying out the charged combination and  
7 conspiracy, the defendant and its coconspirators did those things that they combined and  
8 conspired to do, including, among other things:

- 9 (a) participated in meetings, conversations, and communications in  
10 Taiwan, the United States, and elsewhere to discuss the prices of  
11 aftermarket auto lights;
- 12 (b) agreed, during those meetings, conversations, and communications, to  
13 charge prices of aftermarket auto lights at certain predetermined levels;
- 14 (c) issued price announcements and price lists in accordance with the  
15 agreements reached;
- 16 (d) collected and exchanged information on prices and sales of aftermarket  
17 auto lights for the purpose of monitoring and enforcing adherence to the  
18 agreed-upon prices;
- 19 (e) authorized, ordered, and consented to the participation of subordinate  
20 employees in the conspiracy; and
- 21 (f) took steps to conceal the conspiracy and conspiratorial contacts,  
22 conversations, and communications through various means.

23 II.

24 DEFENDANTS AND COCONSPIRATORS

25 5. MAXZONE VEHICLE LIGHTING CORP. is a corporation organized and  
26 existing under the laws of California. During the time period covered by this Information, the  
27 defendant engaged in the business of selling aftermarket auto lights in the United States as an  
28

1 exclusive distributor for Depo Auto Parts Industrial Co., Ltd., an entity organized and existing  
2 under the laws of Taiwan.

3 6. Various corporations and individuals, not made defendants in this Information,  
4 participated as coconspirators in the offense charged in this Information and performed acts  
5 and made statements in furtherance of it.

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

11 III.

12 TRADE AND COMMERCE

13 8. Aftermarket auto lights are lights incorporated into an automobile after its  
14 original sale, usually as repairs following a collision, but also as accessories and upgrades.  
15 Lighting components include items such as headlights, taillights, fog lights, turn signals, brake  
16 signals, and reflectors.

17 9. During the period covered by this Information, the defendant and its  
18 coconspirators sold and distributed aftermarket auto lights in a continuous and uninterrupted  
19 flow of interstate and foreign trade and commerce to customers located in states or countries  
20 other than the states or countries in which aftermarket auto lights were produced.

21 10. During the period covered by this Information, the business activities of the  
22 defendant and coconspirators that are the subject of this Information were within the flow of,  
23 and substantially affected, interstate and foreign trade and commerce.

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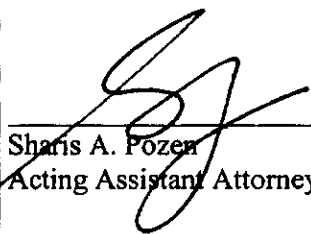
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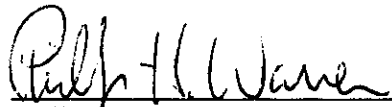
IV.

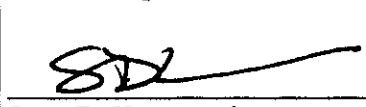
JURISDICTION AND VENUE


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

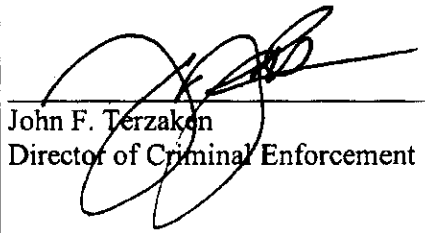
ALL IN VIOLATION OF TITLE 15, UNITED STATES CODE, SECTION 1.


  
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