

| <u>Corporation</u> | <u>State of Incorporation</u> | <u>Principal Place of Business</u> |
|--|-------------------------------|------------------------------------|
| Amtel, Inc. | Rhode Island | Providence, Rhode Island |
| Elco Industries, Inc. | Delaware | Rockford, Illinois |
| NL Industries, Inc. | New Jersey | New York, New York |
| Reed & Prince Manufacturing Company | Massachusetts | Worcester, Massachusetts |
| Textron Inc. | Delaware | Providence, Rhode Island |

III

CO-CONSPIRATORS

4. Various corporations and individuals, not made defendants in this complaint, have participated as co-conspirators with the defendants and have performed acts and made statements in furtherance of the combination and conspiracy described below.

IV

TRADE AND COMMERCE

5. During all or part of the time covered by this complaint, the defendant corporations sold standard screws. Standard screws are common in the trade and are usually produced to a standardized, published specification. They are distinguished from "special" screws which often must be produced from a blueprint supplied by the customer.

6. Standard screws are usually divided into three categories called wood, machine, and tapping screws. Wood screws are tapered to a point and are typically threaded for only part of their length. Machine screws are not tapered and are threaded for their entire length. They must be put into pre-drilled holes having threads compatible with the screw and are sometimes held in place with a nut. Tapping screws, which

include sheet metal screws, are tapered and usually threaded for their entire length. Their main feature is that they cut their own threads in the metal or other material into which they are driven. They are sometimes called "self-tapping" screws because they eliminate the need to "tap" or thread a compatible hole.

7. Standard screws are sold through various types of distributors including independent wholesalers, groups of wholesale distributors, and buying organizations. Reed & Prince Manufacturing Company sold standard screws to distributors under its corporate name. Elco Industries, Inc. sold such screws under its corporate name and through its "Southington" division. Amtel, Inc. sold such screws through a division called "Continental Screw Company." NL Industries, Inc. sold such screws through a division called "Southern Screw Company" or "NL Fasteners." And Textron Inc. sold such screws through a division called "American Screw Company."

8. During the period of time covered by this complaint, each of the defendant corporations sold and shipped substantial quantities of standard screws in interstate commerce to distributors in states other than the states from which such screws were shipped.

9. During the period of time covered by this complaint, the dollar sales of standard screws by the defendant corporations to distributors exceeded \$1 billion.

V

VIOLATION ALLEGED

10. Beginning at least as early as 1957 and continuing thereafter at least until sometime in 1977, the exact dates being unknown to the plaintiff, the defendants and

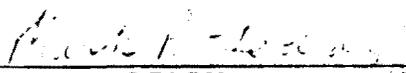
sale of standard screws except in connection with a bona fide purchase or sales transaction between the parties to such communication.

3. The Court order each defendant periodically to advise each of its officers, directors and employees of the provisions of any judgment entered by this Court, and of its and their duties and obligations under that judgment and under the anti-trust laws, and to file with the Court and with plaintiff reports setting forth the steps each defendant has taken to comply with that order.

4. The plaintiff may have such other, further, and different relief as this Court may deem just and proper.

5. The plaintiff recover the costs of this suit.

RICHARD J. FAVRETTO
Deputy Assistant Attorney
General


MARK P. LEDDY

STEVEN M. WOGHIN

ANTHONY V. NANNI

Attorneys, Department of
Justice

JOEL F. BRENNER

EDWARD F. HARRINGTON
United States Attorney

SARA V. DOBB

Attorneys, Department of
Justice