

4. Whenever in this Information reference is made to any act, deed, or transaction of any 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.

II.

BACKGROUND

5. During the period covered by this Information, the Defendant and its co-conspirators supplied certain side-door latches and latch minimodules to Ford for installation in vehicles manufactured and sold in the United States and elsewhere. During the period covered by this Information, the Defendant and its co-conspirators manufactured certain side-door latches and latch minimodules: (a) in the United States for installation in vehicles manufactured and sold in the United States; and (b) in Mexico for export to the United States for installation into vehicles manufactured, and sold in the United States.

6. A side-door latch secures the door to the vehicle body and may be locked to prevent unauthorized access to the vehicle from the exterior. Latch minimodules include the side door latch and all related mechanical operating components, including the electronic lock function.

7. Before ordering certain side-door latches and latch minimodules for a new vehicle model, automobile manufacturers typically request pricing from suppliers through requests for quotation ("RFQs"). In response to the RFQs, the suppliers submit price quotes, or bids, to the automobile manufacturer.

III.

DESCRIPTION OF THE OFFENSE

8. Beginning at least as early as September 2008 until at least May 2013, the exact dates being unknown to the United States, in the Eastern District of Michigan and elsewhere, the Defendant and its co-conspirators knowingly entered into and engaged in a combination and conspiracy to suppress and eliminate competition by agreeing to allocate sales of, to rig bids for, and to fix, stabilize, and maintain the prices of certain side-door latches and latch minimodules sold to Ford in the United States and elsewhere. The combination and conspiracy engaged in by the Defendant and its co-conspirators was in unreasonable restraint of interstate and U.S. import trade and commerce in violation of Section 1 of the Sherman Act (15 U.S.C. § 1).

9. The charged combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among the Defendant and its co-conspirators, the substantial terms of which were to allocate sales of, to rig bids for, and to fix, stabilize, and maintain the prices of certain side-door latches and latch minimodules sold to Ford in the United States and elsewhere.

IV.

MEANS AND METHODS OF THE CONSPIRACY

10. For the purpose of forming and carrying out the charged combination and conspiracy, the Defendant and its co-conspirators did those things that they combined and conspired to do, including, among other things:

- (a) participating in meetings, conversations, and other communications to discuss the bids and price quotations to be submitted to Ford in the United States and elsewhere;

- (b) agreeing, during those meetings, conversations, and communications, to allocate among the corporations sales of certain side-door latches and latch minimodules sold to Ford in the United States and elsewhere;
- (c) agreeing, during those meetings, conversations, and communications, on bids and price quotations to be submitted to Ford in the United States and elsewhere;
- (d) exchanging information on bids and price quotations to be submitted to Ford in the United States and elsewhere, in order to effectuate the agreements;
- (e) submitting bids and price quotations to Ford in the United States and elsewhere in accordance with the agreements;
- (f) selling certain side-door latches to Ford in the United States and elsewhere at collusive and noncompetitive prices; and
- (g) accepting payment for certain side-door latches and latch minimodules sold to Ford in the United States and elsewhere at collusive and noncompetitive prices.

V.

TRADE AND COMMERCE

11. During the period covered by this Information, the Defendant and its co-conspirators sold to Ford in the United States and elsewhere substantial quantities of certain side-door latches and latch minimodules in a continuous and uninterrupted flow of interstate and U.S. import trade and commerce. In addition, substantial quantities of equipment and supplies

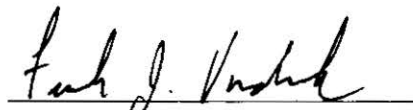
necessary to produce and distribute such side-door latches and latch minimodules, as well as substantial payments for such parts, traveled in interstate commerce.

12. During the period covered by this Information, the business activities of the Defendant and its co-conspirators in connection with the production and sale of certain side-door latches and latch minimodules that are the subject of this Information were within the flow of, and substantially affected, interstate and U.S. import trade and commerce.

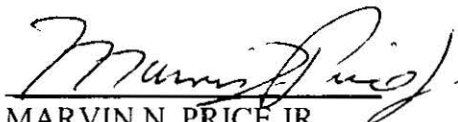
ALL IN VIOLATION OF TITLE 15, UNITED STATES CODE, SECTION 1.



BRENT SNYDER
Acting Assistant Attorney General



FRANK J. VONDRAK
Chief, Chicago Office



MARVIN N. PRICE JR.
Director of Criminal Enforcement
Antitrust Division
U.S. Department of Justice

BY: 

Kevin Culum, MT Bar No. 3460
Jane Phillips, IA Bar No. AT0006246
Jonathan Clow, MO Bar No. 68003
Trial Attorneys
United States Department of Justice
Antitrust Division
209 S. LaSalle Street, Suite 600
Chicago, IL 60604
Tel: (312) 984-7200

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