

**U.S. DEPARTMENT OF JUSTICE ANTITRUST DIVISION  
SHERMAN ACT VIOLATIONS YIELDING A FINE OF \$10 MILLION OR MORE**

<b>Defendant (FY)</b>	<b>Product</b>	<b>Fine (\$Millions)</b>	<b>Geographic Scope</b>	<b>Country</b>
F. Hoffmann-La Roche Ltd. (1999)	Vitamins	\$500	Int'l.	Switzerland
BASF AG (1999)	Vitamins	\$225	Int'l.	Germany
SGL Carbon AG (1999)	Graphite Electrodes	\$135	Int'l.	Germany
UCAR Int'l., Inc. (1998)	Graphite Electrodes	\$110	Int'l.	U.S.
Archer Daniels Midland Co. (1997)	Lysine & Citric Acid	\$100	Int'l.	U.S.
Takeda Chemical Industries, Ltd (1999)	Vitamins	\$72	Int'l.	Japan
Haarmann & Reimer Corp. (1997)	Citric Acid	\$50	Int'l.	German Parent
HeereMac v.o.f. (1998)	Marine Construction	\$49	Int'l.	Netherlands
Eisai Co., Ltd. (1999)	Vitamins	\$40	Int'l.	Japan
Hoechst AG (1999)	Sorbates	\$36	Int'l.	Germany
Showa Denko Carbon, Inc. (1998)	Graphite Electrodes	\$32.5	Int'l.	Japan
Daiichi Pharmaceutical Co., Ltd. (1999)	Vitamins	\$25	Int'l.	Japan
Nippon Gohsei (1999)	Sorbates	\$21	Int'l.	Japan
Pfizer Inc. (1999)	Maltol/Sodium Erythorbate	\$20	Int'l.	U.S.
Fujisawa Pharmaceuticals Co. (1998)	Sodium Gluconate	\$20	Int'l.	Japan
Dockwise N.V. (1998)	Marine Transportation	\$15	Int'l.	Belgium
Dyno Nobel (1996)	Explosives	\$15	Dom.	Norwegian Parent
F. Hoffmann-La Roche, Ltd. (1997)	Citric Acid	\$14	Int'l.	Switzerland
Eastman Chemical Co. (1998)	Sorbates	\$11	Int'l.	U.S.
Jungbunzlauer Int'l. (1997)	Citric Acid	\$11	Int'l.	Switzerland
Lonza AG (1998)	Vitamins	\$10.5	Int'l.	Switzerland
Robert J. Koehler CEO, SGL Carbon AG (1999)	Graphite Electrodes	\$10	Int'l.	Germany
Akzo Nobel Chemicals, BV & Glucona, BV (1997)	Sodium Gluconate	\$10	Int'l.	Netherlands
Mrs. Baird's Bakeries (1996)	Bread	\$10	Dom.	U.S.
Ajinomoto Co., Inc. (1996)	Lysine	\$10	Int'l.	Japan
Kyowa Hakko Kogyo, Co., Ltd. (1996)	Lysine	\$10	Int'l.	Japan
ICI Explosives (1995)	Explosives	\$10	Dom.	British Parent

Prepared by ICPAC staff (November 1999) based on "Antitrust Division: Sherman Act Violations Yielding a Fine of \$10 Million or More" (chart Sept. 1999) received from the U.S. Department of Justice Antitrust Division, Office of Criminal Enforcement.