

# EXHIBIT A



U.S. Department of Justice

Antitrust Division

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*Chicago Office*

Rookery Building  
209 South LaSalle Street, Suite 600  
Chicago, Illinois 60604

312/984-7200  
FAX 312/984-7299

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*Via Electronic Mail*

Larry Mackey, Esq.  
Kendall Millard, Esq.  
Barnes & Thornburg LLP  
11 South Meridian Street  
Indianapolis, Indiana 46204

Jeanne Cors, Esq.  
Ralph Kohnen, Esq.  
Taft Stettinius & Hollister LLP  
425 Walnut Street, Suite 1800  
Cincinnati, Ohio 45202-3957

Re: *United States v. Tokai Kogyo, et al.*, No. 16 CR 63  
Defendants: Tokai Kogyo Co., Ltd. and Green Tokai Co., Ltd.

Dear Counsel:

Per your request for a bill of particulars, the United States discloses the following information. Please note that we reserve the right to amend or supplement these disclosures if appropriate.

A. Members of the Conspiracy

The following companies and individuals participated as co-conspirators during some or all of the charged period:

Company: Tokai Kogyo Co., Ltd. / Green Tokai Co., Ltd.

Individuals: Akitada Tazumi; [REDACTED]

Company: [REDACTED]

Individuals: [REDACTED]

Company: [REDACTED]  
Individual: [REDACTED]

B. Relevant RFQs

The co-conspirators discussed and reached agreements related to automotive body sealing parts for which Honda issued RFQs in the United States. During the charged period, this included RFQs issued in connection with the following Honda models:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Notably, U.S. sales of parts for global models ([REDACTED]) were specifically targeted not only by co-conspirators acting in the United States, including defendant Green Tokai Co., Ltd., [REDACTED], and their employees, but also by co-conspirators in Japan, including defendant Tokai Kogyo Co., Ltd., [REDACTED], Ltd., and their employees.

C. Interstate Commerce / FTAIA

The conspiracy involved (1) the interstate shipment of affected parts by Green Tokai and [REDACTED] to Honda, including parts shipped from Green Tokai in Ohio to Honda's plant in Greensburg, Indiana, and parts shipped from [REDACTED] to Honda's plants in Marysville and East Liberty, Ohio, as well as (2) interstate payment for affected parts, including by Honda of America Manufacturing in Ohio to [REDACTED]. The conspiracy therefore involved domestic interstate commerce, which is excluded from the coverage of the FTAIA. *See* 15 U.S.C. § 6a; *Minn-Chem, Inc. v. Agrium, Inc.*, 683 F.3d 845, 854 (7th Cir. 2012) (en banc); *cf. Carrier Corp. v. Outokumpu Oyj*, 673 F.3d 430, 438 n.3 (6th Cir. 2012).

Please do not hesitate to contact me if you have any questions or concerns.

Very truly yours,



L. Heidi Manschreck  
Trial Attorney