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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

02100781

12 UNITED STATES OF AMERICA)
13)
14 v.)
15)
16 JUI HUNG "SAM" WU,)
17 Defendant.)

No. CR
INFORMATION
VIOLATION:
Title 15, United States Code,
Section 1 (Price Fixing)
San Francisco Venue

CRB

18
19 The United States of America, acting through its attorneys, charges:

20 I.

21 DESCRIPTION OF THE OFFENSE

22 1. JUI HUNG "SAM" WU ("defendant") is made a defendant on the charge stated
23 below.

24 2. From on or about September 14, 2001 until on or about January 31, 2006, the
25 defendant's former corporate employer, HannStar Display Corporation ("HannStar"), and
26 coconspirators entered into and engaged in a combination and conspiracy in the United States
27 and elsewhere to suppress and eliminate competition by fixing the prices of thin-film transistor
28 liquid crystal display panels ("TFT-LCD"). The combination and conspiracy engaged in by the

1 Hannstar and coconspirators was an unreasonable restraint of interstate and foreign trade and
2 commerce in violation of Section 1 of the Sherman Act (15 U.S.C. § 1). The defendant
3 knowingly joined and participated in the charged conspiracy from on or about September 21,
4 2001, to on or about January 31, 2006.

5 3. The charged combination and conspiracy consisted of a continuing agreement,
6 understanding, and concert of action among the defendant, Hannstar, and coconspirators, the
7 substantial terms of which were to agree to fix the prices of TFT-LCD.

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

- 11 (a) participating in meetings, conversations, and communications in Taiwan,
12 Korea, and the United States to discuss the prices of TFT-LCD;
- 13 (b) agreeing, during those meetings, conversations, and communications, to
14 charge prices of TFT-LCD at certain predetermined levels;
- 15 (c) issuing price quotations in accordance with the agreements reached;
- 16 (d) exchanging information on sales of TFT-LCD for the purpose of
17 monitoring and enforcing adherence to the agreed-upon prices; and
- 18 (e) authorizing, ordering, and consenting to the participation of subordinate
19 employees in the conspiracy.

20 II.

21 DEFENDANT AND COCONSPIRATORS

22 5. HannStar was a corporation organized and existing under the laws of Taiwan and
23 was engaged in the business of producing and selling TFT-LCD to customers in the United States
24 and elsewhere during the time period covered by this information. JUI HUNG "SAM" WU was
25 Executive Director of Global Sales & Marketing for HannStar during certain periods covered by
26 this information.

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

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

8 III.

9 TRADE AND COMMERCE

10 8. TFT-LCD are glass panels composed of an array of tiny pixels that are
11 electronically manipulated in order to display images. TFT-LCD are manufactured in a broad
12 range of sizes and specifications for use in televisions, notebook computers, desktop monitors,
13 mobile devices, and other applications.

14 9. During the period covered by this Information, the defendant, Hannstar, and
15 coconspirators sold and distributed TFT-LCD in a continuous and uninterrupted flow of interstate
16 and foreign trade and commerce to customers located in states or countries other than the states or
17 countries in which the defendant, Hannstar, and their coconspirators produced TFT-LCD.

18 10. The business activities of the defendant, Hannstar, and coconspirators that are the
19 subject of this Information were within the flow of, and substantially affected, interstate and
20 foreign trade and commerce.

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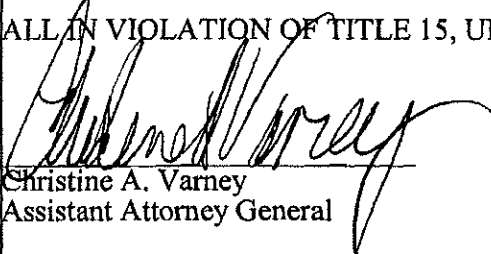
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IV.


JURISDICTION AND VENUE

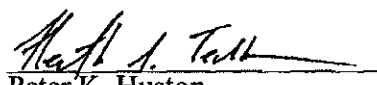
11. The combination and conspiracy charged in this Information was carried out, in part, in the Northern District of California, within the five years preceding the filing of this Information.


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

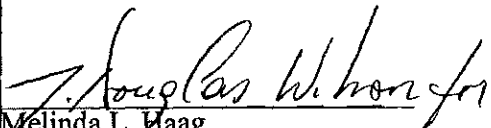

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