

Exhibit A

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Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

v.

MONSANTO COMPANY,

Defendant.

CR NO.

I N F O R M A T I O N

[42 U.S.C. § 6928(d)(2)(A):
Unlawful Storage of Acute
Hazardous Waste; 7 U.S.C.
§§ 136j(a)(2)(K), 136l(b)(1)(B):
Unlawful Spraying of a Banned
Pesticide]

INFORMATION

COUNT 1

The United States Attorney charges:

Beginning on or before January 1, 2014, and continuing to on or
about September 17, 2014, in Maui County, within the District of

1 Hawaii, defendant MONSANTO COMPANY knowingly stored acute hazardous
2 waste, namely, more than one kilogram of methyl parathion, also known
3 as Penncap-M, on the premises located at 1351 Mauna Loa Highway,
4 Kaunakakai, Hawaii, on the island of Molokai, without a permit under
5 Title 42, United States Code, Chapter 82, Subchapter III or pursuant
6 to Title I of the Marine Protection, Research, and Sanctuaries Act,
7 in violation of Title 42, United States Code, Section 6928(d)(2)(A).

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COUNT 2

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2 Beginning on or before January 1, 2014, and continuing to on or
3 about October 21, 2014, in Maui County, within the District of
4 Hawaii, defendant MONSANTO COMPANY knowingly stored acute hazardous
5 waste, namely, more than one kilogram of methyl parathion, also known
6 as Penncap-M, on the premises known as "Valley Farm" located on Maui
7 Veterans Highway in Kihei, Hawaii, on the island of Maui, without a
8 permit under Title 42, United States Code, Chapter 82, Subchapter III
9 or pursuant to Title I of the Marine Protection, Research, and
10 Sanctuaries Act, in violation of Title 42, United States Code,
11 Section 6928(d)(2)(A).

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COUNT 3

On or about July 15, 2014, in Maui County, within the District of Hawaii, defendant MONSANTO COMPANY, a commercial applicator, knowingly sprayed methyl parathion, also known as PennCap-M, a restricted use pesticide that was banned pursuant to a cancellation order issued by the Environmental Protection Agency, on corn seed and research crops on the premises known as "Valley Farm" located on Maui Veterans Highway in Kihei, Hawaii, on the island of Maui, in violation of Title 7, United States Code, Sections 136j(a)(2)(K), 136l(b)(1)(B).

Dated: October ____, 2019, at Los Angeles, California.

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United States v. Monsanto Company
"Information"