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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 GOODYEAR INTERNATIONAL CORP.,)
)
 Defendant.)

15 USC 78dd-2
(Foreign Corrupt Practices Act)

Criminal No. 89-0156

ROBINSON, C. J.

INFORMATION

The United States Attorney charge that:

FILED

MAY 11 1989

CLERK, U. S. DISTRICT COURT
DISTRICT OF COLUMBIA

COUNT I

(1) At all times material herein:

(a) The defendant GOODYEAR INTERNATIONAL CORP. (hereinafter GOODYEAR INTERNATIONAL), was a corporation organized under the laws of Delaware with its principal offices in Akron, Ohio, and was engaged in the marketing of car and truck tires to foreign customers, including foreign government agencies. The defendant GOODYEAR INTERNATIONAL, a subsidiary of Goodyear Tire & Rubber Company, was a domestic concern as that term is defined in the Foreign Corrupt Practices Act of 1977, 15 U.S.C. Section 78dd-(d) (1).

(b) The Iraqi Trading Company was an instrumentality of the Government of the Republic of Iraq as that term is used in the Foreign Corrupt Practices Act of 1977, 15 U.S.C. Section 78dd-2(a).

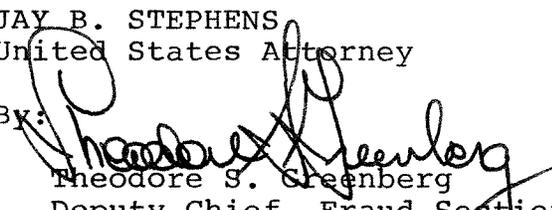
Case Related To 88-366

(2) On or about August 20, 1984, in the Northern District of Ohio, the defendant, GOODYEAR INTERNATIONAL, corruptly used the United States mails to convey a check, in payment of an invoice for bogus advertising expense in the amount of \$167,429, in furtherance of an offer, payment and promise to pay money in the aggregate amount \$981,124, to an official of the Government of Iraq, to induce said official to use his influence to affect and influence an act of the Government of Iraq, to wit, the purchase of truck tires manufactured by the defendant, in order to assist the defendant GOODYEAR INTERNATIONAL to obtain and retain business with the Government of Iraq.

(All in violation of Section 104(a) (1) of the Foreign Corrupt Practices Act of 1977, 15 U.S.C., Section 78dd-2(a) (1).

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Dated: May 11, 1985