
IN THE MATTER OF
GEORGIA-PACIFIC CORPORATION
CONSENT ORDER, ETC., IN REGARD TO THE ALLEGED VIOLATION OF
THE FEDERAL TRADE COMMISSION ACT

Docket C-2402. Complaint, May 16, 1973—Decision, May 16, 1973.

Consent order requiring a Portland, Oregon, manufacturer of a wide variety of products including wood, paper, pulp, chemicals and wood products, among other things to cease engaging in unfair methods of competition by systematically using its purchasing power to obtain sales to its actual or potential suppliers. Respondent is further required to destroy certain statistical data and maintain certain other records as set out in the order.

COMPLAINT

Pursuant to the provisions of the Federal Trade Commission Act, and by virtue of the authority vested in it by said Act, the Federal Trade Commission, having reason to believe that Georgia-Pacific Corporation, a corporation, hereinafter referred to as the respondent, has violated the provisions of said Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, hereby issues its complaint, stating its charges as follows:

PARAGRAPH 1. Respondent Georgia-Pacific Corporation, is a corporation organized, existing and doing business under and by virtue of the laws of the State of Georgia, with its principal office and place of business located at 900 S.W. Fifth Avenue, Portland, Oregon. It owns a controlling interest in approximately forty subsidiary corporations.

PAR. 2. Respondent is now, and for some time last past has been engaged in the manufacture, sale and distribution of a wide variety of products including, but not limited to, wood, paper, paperboard, converted paper products, pulp, chemicals, plywood, gypsum, hardboard, flakeboard, particleboard, doors, aluminum,

mill work and furniture. In 1971 respondent had approximately 200 plants and more than 100 product distribution centers located throughout the United States. Respondent's total assets are approximately \$1.8 billion.

PAR. 3. In connection with its manufacturing and distribution operations, respondent purchases a substantial volume of raw materials, products or services from various suppliers located throughout the United States, many of which use, or can use, raw materials or products sold and distributed by respondent. During the period 1964 through 1971, respondent's annual purchases increased from approximately \$300 million to in excess of \$700 million, most of which were for substantial quantities of supplies and materials used for production of its manufactured goods throughout the United States and in the operation of its plants and offices. Respondent's annual net sales increased substantially during the period 1964 to 1971, from approximately \$500 million to \$1.4 billion.

PAR. 4. In the course and conduct of its business respondent is, and has been, engaged in commerce, as "commerce" is defined in the Federal Trade Commission Act, in that it has sold its materials and products to purchasers located in various States of the United States, and caused such materials and products, when sold, to be transported from its facilities in various States of the United States to such purchasers located in various other States of the United States.

PAR. 5. Except to the extent that competition has been frustrated, hindered, foreclosed, lessened or eliminated as hereinafter set forth, respondent has been and is now, in competition with firms, partnerships or corporations engaged in the business of manufacturing, distributing and selling wood, pulp, paper, gypsum, chemicals or other products in commerce.

PAR. 6. In the course and conduct of its business as described above respondent has, for a number of years and is now, engaged in unfair methods of competition and unfair acts and practices in commerce in violation of Section 5 of the Federal Trade Commission Act in that respondent has systematically utilized its purchasing power to obtain or attempt to obtain sales of its products, services, or raw materials to certain of its actual or potential suppliers.

PAR. 7. In order to utilize its purchasing power as described above respondent has engaged in one or more of the following acts and practices, but not limited thereto:

A. Compiled data on purchases from various suppliers and

sales to various suppliers and has collated certain such purchase and sales data of certain suppliers.

B. Disclosed statistical data or other information relating to its actual or potential purchases from certain companies to its sales personnel or its employees with purchasing and sales responsibilities.

C. Disclosed statistical data or other information relating to its actual or potential sales to certain companies to its purchasing personnel.

D. Disclosed specific purchasing or sales data, or other information to sales personnel for their use in selling or attempting to sell respondent's products to certain companies.

E. Utilized statistical sales or purchase data or other information in order to determine which suppliers should be favored or the extent to which suppliers should be permitted to participate in supplying respondent.

F. Communicated with its actual or potential suppliers regarding purchases or sales, in order to ascertain, develop, facilitate, or further a relationship of sales and purchases between respondent and the suppliers or another company.

G. Purchased or attempted to purchase from certain companies or their designees on the understanding that such companies would purchase from respondent or another company.

H. Sold or attempted to sell to certain companies or their designees on the understanding that such companies would sell to respondent or another company.

I. Refused to buy or reduced purchases from certain suppliers who did not purchase, maintain or increase purchases from the respondent or another company.

J. Purchased from certain companies in order to induce such companies to purchase from respondent or another company.

K. Sold or attempted to sell to certain companies in order to induce such companies to sell to respondent or another company.

L. Established a director of purchasing and trade relations whose responsibilities included but were not limited to, developing and coordinating respondent's trade relations with other supplying and buying corporations in order to stimulate or increase its sales.

PAR. 8. The acts and practices of respondent, described above in Paragraphs Six and Seven, have had and still have the capacity, tendency, and effect of (a) foreclosing the sale of substantial quantities of various products, services, or raw

materials to respondent by various actual or potential suppliers of such products, services, and raw materials, (b) foreclosing competitors of respondent in the sale of substantial quantities of various products, services, or raw materials, (c) giving respondent an unfair competitive advantage over its competitors, or (d) depriving its competitors or actual or potential suppliers of full and free competition in the market place.

PAR. 9. The acts and practices of respondent as herein alleged, were and are to the prejudice and injury of the public and respondent's competitors and constituted, and now constitute, unfair methods of competition in commerce and unfair acts and practices in commerce in violation of Section 5 of the Federal Trade Commission Act.

DECISION AND ORDER

The Federal Trade Commission having initiated an investigation of certain acts and practices of the respondent named in the caption hereof, and the respondent having been furnished thereafter with a copy of a draft of complaint which the Seattle Regional Office proposed to present to the Commission for its consideration and which, if issued by the Commission, would charge respondent with violation of the Federal Trade Commission Act; and

The respondent and counsel for the Commission having thereafter executed an agreement containing a consent order, an admission by the respondent of all the jurisdictional facts set forth in the aforesaid draft of complaint, a statement that the signing of said agreement is for settlement purposes only and does not constitute an admission by respondent that the law has been violated as alleged in such complaint, and waivers and other provisions as required by the Commission's rules; and

The Commission having thereafter considered the matter and having determined that it had reason to believe that the respondent has violated the said Act, and that complaint should issue stating its charges in that respect, and having thereupon accepted the executed consent agreement and placed such agreement on the public record for a period of thirty (30) days, now in further conformity with the procedure prescribed in Section 2.34(b) of its rules, the Commission hereby issues its complaint, makes the following jurisdictional findings, and enters the following order:

1. Respondent Georgia-Pacific Corporation is a corporation

organized, existing and doing business under and by virtue of the laws of the State of Georgia, with its office and principal place of business located at 900 S.W. Fifth Avenue, Portland, Oregon.

2. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the respondent, and the proceeding is in the public interest.

ORDER

For the purposes of this order, the definitions below shall apply, although words of inclusion used herein are not words of limitation:

“Respondent” includes Georgia-Pacific Corporation, a corporation, its subsidiaries, successors and assigns.

“Company” includes any business entity.

“Purchase” and “purchases” include (a) any receipt of products, services or raw materials from another company in exchange for money, products, services or raw materials, and (b) the leasing of anything of value from another company.

“Sell” and “sales” include any conveyance of products or raw materials to, or any performance of services for another company in exchange for money, products, services or raw materials.

I

It is ordered, That respondent, its officers, directors, employees, agents and representatives, directly or through any corporate or other device, shall forthwith cease and desist from:

A. Purchasing or entering into or adhering to any agreement or understanding to purchase from an actual or potential supplier on the understanding that any of such purchases are conditioned upon or related to any sales by respondent or any other company;

B. Selling or entering into, or adhering to any agreement or understanding to sell to an actual or potential customer on the understanding that any of such sales are conditioned upon or related to any purchases by respondent or any other company;

C. Purchasing in order to promote or induce sales to another company;

D. Selling in order to promote or induce sales by another company;

E. Communicating to another company that:

1. purchases by respondent or relative positions on respondent's bidder lists will or may be conditioned upon or related to sales by respondent or another company;

2. sales by respondent or relative positions on respondent's bidder lists will or may be conditioned upon or related to purchases by respondent or another company;

F. Discussing, comparing, or exchanging statistical data or other information with another company in order to ascertain, develop, facilitate or further any relationship between purchases and sales of the nature prohibited by this order;

G. Preparing or maintaining statistical data which compares or otherwise relates purchases by respondent from a company to sales by respondent to such company;

H. Causing or permitting any of respondent's personnel holding any of the positions listed in Appendix 1, hereof, to influence, request, or suggest to any of respondent's personnel holding any of the positions listed in Appendixes 2 or 3, hereof, to consider respondent's actual or potential sales to any company as a factor in any decision to purchase from such company;

I. Causing or permitting any of respondent's personnel who are primarily and directly engaged in promoting or obtaining sales on behalf of respondent, including, but not limited to, respondent's personnel holding any of the positions listed in Appendix 2, hereof, to:

1. engage in purchasing;
2. obtain statistical data or other information which shows the amount of actual or potential purchases by respondent from any company;
3. attend any meeting, a purpose of which is the discussion of respondent's purchases or its purchasing strategy;
4. specify or recommend, because of the status of any company as an actual or potential customer of respondent, that purchases could or should be made from such company;

Provided, however, That nothing contained in this subparagraph shall prohibit any of respondent's personnel holding any of the positions listed in Appendix 2, hereof, and followed by brackets ([]), from:

- a. purchasing items for resale by the divisions of

respondent for which such individual is assigned sales and purchasing responsibilities;

b. obtaining statistical data or other information which shows the amount of actual or potential purchases of items for resale by the divisions of respondent for which such individual is assigned sales and purchasing responsibilities;

c. attending any meeting, the purpose of which is the discussion of respondent's purchases of items for resale or its strategy for purchasing such items;

J. Causing or permitting any of respondent's personnel who are primarily and directly engaged in purchasing on behalf of respondent, including, but not limited to, respondent's personnel holding any of the positions listed in Appendix 3, hereof, to:

1. engage in obtaining sales;
2. obtain statistical data or other information which shows the amount of actual or potential sales by respondent to any company;
3. attend any meeting, a purpose of which is the discussion of respondent's sales, or its strategy for obtaining sales;
4. specify or recommend, because of the status of any company as an actual or potential supplier to respondent, that sales could or should be made to such company;

Provided, however, That nothing contained in this subparagraph shall prohibit any of respondent's personnel holding any of the positions listed in Appendix 3, hereof, and followed by brackets ([]), from:

a. selling items purchased for resale by the divisions of respondent for which such individual is assigned purchasing and resale responsibilities;

b. obtaining statistical data or other information which shows the amount of actual or potential sales of items purchased for resale by the divisions of respondent for which such individual is assigned purchasing and resale responsibilities;

c. attending any meeting, the purpose of which is the discussion of respondent's sales of items purchased for resale by respondent or its strategy for selling such items.

II

It is further ordered, That respondent shall, within thirty (30) days subsequent to the date of this order, destroy:

A. All statistical data in its possession, custody, or control which compares or otherwise relates purchases from another company to sales to such company;

B. All statistical data and other information, which shows the amount of actual or potential purchases by respondent from any company, and which is in the possession, custody or control of any of respondent's personnel holding any of the positions listed in Appendix 2, hereof;

C. All statistical data and other information which shows the amount of actual or potential sales by respondent to any company, and which is in the possession, custody, or control of any of respondent's personnel holding any of the positions listed in Appendix 3, hereof.

III

It is further ordered, That respondent shall, within sixty (60) days subsequent to the date of this order:

A. Issue a copy of Attachment A, hereof, to each of respondent's personnel listed on its then-current Key Personnel List A or Key Personnel List B;

B. Insert and maintain the language of Attachment A hereof within all manuals and other such documents which set out respondent's policies or procedures for purchasing or for obtaining sales, or its policies relating to the compilation or distribution of statistical purchase or sales data.

IV

It is further ordered, That respondent shall, beginning within sixty (60) days of the date of this order and for a period of one (1) year subsequent to such beginning date, mail or otherwise distribute copies of Attachment B, hereof, together with a copy of this order, exclusive of all appendixes, in the following manner:

A. Attached to each purchase order or substitute document issued by respondent to any supplier for any purchase in excess of \$5,000 documented thereby if such attachment has not previously been provided to such supplier in compliance with this paragraph;

B. Attached to each invoice or substitute document issued

by respondent to any customer for any sale made by respondent in excess of \$5,000 if such attachment has not previously been provided to such customer in compliance with this paragraph; *Provided, however*, in lieu of the requirement stated in this subparagraph B, for all sales made by respondent through its distribution division only, respondent may, in the alternative make a single distribution by mail of copies of said Attachment B and of this order (exclusive of all appendixes), to each of its customers listed on its then-current computerized distribution division customer list.

The above provisions of this Paragraph IV notwithstanding, respondent shall, within sixty (60) days subsequent to the date of this order, mail a copy of Attachment B, hereof, together with a copy of this order (exclusive of all appendixes), to each company which is a party with respondent to any contract or agreement of the nature described in Paragraph XI, below.

V

It is further ordered, That respondent notify the Federal Trade Commission:

A. At least thirty (30) days prior to any proposed change in its corporate structure, such as dissolution, assignment or sale resulting in the emergence of a successor corporation, the creation or dissolution of subsidiaries, or any other change in the respondent which may affect compliance obligations arising out of this order;

B. Annually of all positions with responsibility for sales or purchases. For purposes of compliance with this subparagraph respondent shall furnish to the Federal Trade Commission at the end of each year a list of all such positions and the names of the employees holding each such positions.

VI

It is further ordered, That respondent shall, within sixty (60) days subsequent to the date of this order, file with the Federal Trade Commission a written report setting forth in detail the manner and form in which it has complied with this order including, but not limited to, the name of each individual to whom a copy of Attachment A, hereto, was issued pursuant to Paragraph III, above.

VII

It is further ordered, That respondent shall, within ninety (90) days subsequent to the first (1st) anniversary of the date of this order, provide the Federal Trade Commission with the name of each company to which copies of Attachment B, hereof, and this order were mailed or otherwise distributed pursuant to Paragraph IV, above.

VIII

It is further ordered, That respondent shall, within sixty (60) days of the third (3rd) anniversary of the date of this order:

A. Cause each of its then-current personnel who, at such third (3rd) anniversary date of this order, hold any of the positions listed in Appendix 1, hereof, to complete and furnish to respondent's legal department a sworn statement in the form of Attachment C, hereof;

B. Cause each of its then-current personnel who, at such third (3rd) anniversary date of this order, hold any of the positions listed in Appendix 2, hereof, other than those positions preceded by an asterisk (*), to complete and furnish to respondent's legal department a sworn statement in the form of Attachment D, hereof;

C. Cause each of its then-current personnel who, at such third (3rd) anniversary date of this order, hold any of the positions listed in Appendix 3, hereof, other than those positions preceded by an asterisk (*), to complete and furnish to respondent's legal department a sworn statement in the form of Attachment E, hereof.

IX

It is further ordered, That respondent shall:

A. Request each of its personnel who, at any time subsequent to the date of this order, has held any of the positions listed in Appendix 1, hereof, and who leaves the employ of respondent prior to the third (3rd) anniversary of the date of this order, to complete and furnish to respondent's legal department, within ten (10) days preceding such termination of employment, a sworn statement in the form of Attachment C, hereof;

B. Request each of its personnel who, at any time subsequent to the date of this order, has held any of the positions listed in Appendix 2, hereof, other than those

positions preceded by an asterisk (*), and who leaves the employ of respondent prior to the third (3rd) anniversary of the date of this order, to complete and furnish to respondent's legal department, within ten (10) days preceding such termination of employment, a sworn statement in the form of Attachment D, hereof;

C. Request each of its personnel who, at any time subsequent to the date of this order, has held any of the positions listed in Appendix 3, hereof, other than those positions preceded by an asterisk (*), and who leaves the employ of respondent prior to the third (3rd) anniversary of the date of this order, to complete and furnish to respondent's legal department, within ten (10) days preceding such termination of employment, a sworn statement in the form of Attachment E, hereof.

X

It is further ordered, That respondent shall submit to the Federal Trade Commission:

A. Within ninety (90) days subsequent to the third (3rd) anniversary of the date of this order, all sworn statements which it has received pursuant to Paragraph VIII, above;

B. Within ninety (90) days subsequent to the first (1st) anniversary of the date of this order, and annually thereafter for a period of two (2) years, all sworn statements which it has received pursuant to Paragraph IX, above, together with the name and address of each individual who would have been required by Paragraph IX, above, but did not complete a sworn statement at any time in the one (1) year period immediately prior to such submission.

XI

It is further ordered, That nothing contained in this order shall prohibit respondent from:

A. Entering into or adhering to any contract or agreement pursuant to which respondent shall purchase from another party any products which respondent also produces in exchange for the purchase from respondent by such other party of an approximately equal volume or value of like or similar products in any stage of process;

B. Entering into or adhering to any contract or

agreement for the conversion of respondent's products or goods into other forms for its own use or for resale or for the conversion by respondent of the products or goods of other parties;

C. Entering into or adhering to any contract or agreement for construction work or for the manufacture, installation, servicing or operating of equipment, products or facilities, or the furnishing of supplies, for respondent's own use, or the use of its employees, on the condition that respondent's or other specified products, goods or services be used in the performance of such contracts or agreements; *Provided, however,* That such contracts or agreements are not used to carry out or promote any reciprocal purchasing policy, arrangement or practice of the type prohibited by this order.

Provided, however, That nothing in this paragraph or any of its subparagraphs shall be construed as having application to, or limiting in any manner whatsoever, any other proceeding or investigation initiated by the Federal Trade Commission, and that the Federal Trade Commission reserves the right to take further action including the issuance of a complaint with respect to transactions of the nature described in this paragraph and each of its subparagraphs in the event that it shall at any time in the future have reason to believe that any of such transactions may violate any of the statutes administered by it.

XII

It is further ordered, That nothing contained in this order shall prohibit respondent from preparing and compiling statistical data and information showing sales to particular customers or groups of customers ("sales summaries") and statistical data and information showing purchases from particular suppliers or groups of suppliers ("purchasing summaries") for use by its managerial personnel, *Provided,* That such sales and purchasing summaries are not used by any of such managerial personnel to carry out or promote any reciprocal purchasing policy, arrangement, or practice of the type prohibited by this order; *Provided further,* That no such sales summaries be made available to personnel with primary purchasing responsibility, and no such purchasing summaries be made available to personnel with primary sales responsibility; *Provided further,* That respondent prepare at the end of each year for a period of three (3) years subsequent to the date of this order, a list of all

such sales and purchasing summaries, and maintain for a period of five (5) years following their preparation, the original or a copy of each such sales and purchasing summary, together with a list of the personnel to whom each was distributed; and *Provided further*, That respondent shall send the above-described lists to the Federal Trade Commission at the end of each of such three years and shall grant any duly authorized representative of the Federal Trade Commission access to the sales and purchasing summaries to which such lists relate.

XIII

It is further ordered, That respondent shall, for a period of five (5) years subsequent to the date of this order:

A. Maintain:

1. all written contracts and agreements of the nature described in Paragraph XI, above; and
 2. documents sufficient to disclose the terms and substance of all oral contracts and agreements of the nature described in Paragraph XI, above;
- together with documents sufficient to show the total annual dollar value and/or volume of deliveries and receipts pursuant to each such written or oral contract and agreement;

B. Grant any duly authorized representative of the Federal Trade Commission access to all such contracts, agreements, and other documents;

C. Furnish to the Federal Trade Commission copies of all such contracts, agreements, and other documents which are requested by any of its duly authorized representatives.

ATTACHMENT A

Re: Federal Trade Commission Order Concerning the Selling and Purchasing Activities of Georgia-Pacific Corporation and its Subsidiaries.

Pursuant to an Order of the Federal Trade Commission, we issue the following policies and guidelines:

General

No employee shall:

1. discuss, compare or exchange statistical data or other information with another company in order to ascertain, develop, facilitate or further any relationship between our purchases and our sales;
2. prepare, maintain or in any manner obtain statistical data which compares or otherwise relates our purchases from a company to our sales to such company.

Purchasing

It is our policy to purchase solely on the basis of price, quality and service. Purchasing personnel shall be prepared to justify all purchases in light of these criteria. No purchase may be conditioned upon or related to our sales or sales by any other company nor shall any employee suggest or imply to any actual or potential supplier that any purchase is so conditioned or related.

No Purchasing Department personnel shall:

1. engage in sales or marketing on our behalf;
2. in any manner obtain statistical data or other information which shows the amount of our actual or potential sales to any company;
3. attend any meeting, a purpose of which is the discussion of our sales or our strategy for obtaining sales;
4. specify or recommend to our sales or marketing personnel, because of the status of any company as an actual or potential supplier, that sales could or should be made to such company.

Selling

No employee promoting sales to any actual or potential customer shall suggest or imply that such sales are conditioned upon or related to our purchases or purchases by any other company.

No sales or marketing personnel shall:

1. engage in purchasing on our behalf;
2. in any manner obtain statistical data or other information which shows the amount of our actual or potential purchases from any company;
3. attend any meeting, a purpose of which is the discussion of our purchases or our purchasing strategy, except to the extent discussion concerns the purchase of items for resale;
4. specify or recommend to our purchasing personnel, because of the status of any company as an actual or potential customer, that purchases could or should be made from such company.

Items Purchased for Resale

Those employees who are assigned sales and purchasing responsibilities in connection with items purchased for resale by our company are not prohibited from performing such functions.

Violation of Policies or Guidelines

Violation of the above policies or guidelines shall subject any offending employee to dismissal from his employment.

ATTACHMENT B

To our Customers and Suppliers:

Pursuant to the attached Order of the Federal Trade Commission, we herewith advise you that it is the policy of Georgia-Pacific Corporation to purchase solely on the basis of price, quality and service. We wish to assure you that our purchases will in no way be conditioned upon or related to our sales to you or any other company.

Chairman of the Board
and President.

ATTACHMENT C

Name and address:

Positions held, with dates, with Georgia-Pacific Corporation or its subsidiaries since _____ (the date of this Order) _____:

I have marked the statement below which is true:

- ___1. I have engaged in one or more of the activities of the nature prohibited by Article I, subparagraphs A through H, inclusive, of (this Order) at some time since (the date of this Order) .
- ___2. I have not engaged in any activities of the nature prohibited by Article I, subparagraphs A through H, inclusive, of (this Order) since (the date of this Order) .

(Signature)

City of _____

State of _____

Sworn to and subscribed before me this _____ day of _____, 1972.

(Notary Public)

ATTACHMENT D

Name and address:

Positions held, with dates, with Georgia-Pacific Corporation or its subsidiaries since (the date of this Order) :

I have marked all statements below which have been true at all times since (the date of this Order) :

- ___1. I have not discussed, compared, or exchanged statistical data or other information with another company in order to ascertain, develop, facilitate, or further any reciprocal relationship between purchases and sales by Georgia-Pacific Corporation or its subsidiaries, and such company.
- ___2. I have not prepared or maintained statistical data which compared or otherwise related purchases by Georgia-Pacific Corporation or its subsidiaries from any company to sales by Georgia-Pacific Corporation or its subsidiaries to such company.
- ___3. I have not specified or recommended, because of the status of any company as an actual or potential customer, that purchases could or should be made from such company.
- ___4. I have not suggested or implied to another company that purchases by Georgia-Pacific Corporation or its subsidiaries might be conditioned upon or related to sales to such company.
- ___5. I have not engaged in purchasing on behalf of Georgia-Pacific Corporation or its subsidiaries, other than purchasing for resale.
- ___6. I have not in any manner obtained statistical data or other information which showed the amount of actual or potential purchases from any company by Georgia-Pacific Corporation or its subsidiaries, other than purchases for resale.
- ___7. I have not attended a meeting, a purpose of which was the discussion of the purchasing strategy of Georgia-Pacific Corporation or its subsidiaries, other than its strategy for purchasing for resale.
- ___8. To the best of my knowledge and belief, none of the individuals over whom I have had line authority since (the date of this Order) have since such time engaged in any of the activities set out above.

(Signature)

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Decision and Order

City of _____

State of _____

Sworn to and subscribed before me this _____ day of _____, 1972.

(Notary Public)

ATTACHMENT E

Name and address:

Positions held, with dates, with Georgia-Pacific Corporation or its subsidiaries since _____ (the date of this Order) _____ :

I have marked all statements below which have been true at all times since _____ (the date of this Order) _____ :

- ____1. I have not discussed, compared, or exchanged statistical data or other information with another company in order to ascertain, develop, facilitate, or further any reciprocal relationship between purchases and sales by Georgia-Pacific Corporation or its subsidiaries and such company.
- ____2. I have not prepared or maintained statistical data which compared or otherwise related sales by Georgia-Pacific Corporation or its subsidiaries to any company with purchases by Georgia-Pacific Corporation or its subsidiaries from such company.
- ____3. I have not specified or recommended, because of the status of any company as an actual or potential supplier, that sales could or should be made to such company.
- ____4. I have not suggested or implied to another company that purchases by Georgia-Pacific Corporation or its subsidiaries might be conditioned upon or related to sales to such company.
- ____5. I have not engaged in sales or marketing on behalf of Georgia-Pacific Corporation or its subsidiaries, other than the sale of items purchased for resale.
- ____6. I have not in any manner obtained statistical data or other information which showed the amount of actual or potential sales to any company by Georgia-Pacific Corporation or its subsidiaries, other than sales of items purchased for resale.
- ____7. I have not attended a meeting, a purpose of which was the discussion of the strategy of Georgia-Pacific Corporation or its subsidiaries for obtaining sales, other than its strategy for selling items purchased for resale.
- ____8. To the best of my knowledge and belief, none of the individuals over whom I have had line authority since _____ (the date of this Order) _____ have since such time engaged in any of the activities set out above.

(Signature)

City of _____

State of _____

Sworn to and subscribed before me this _____ day of _____, 1972.

(Notary Public)

Appendix 1

Executive personnel of respondent

Appendix 2

Personnel who are primarily and directly engaged in obtaining sales on behalf of respondent. Place asterisks before all positions which are not required to file affidavits.

Appendix 3

Personnel who are primarily and directly engaged in purchasing on behalf of respondent. Place asterisks before all positions which are not required to file affidavits.
