

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Joseph J. Simons, Chairman**
 Noah Joshua Phillips
 Rohit Chopra
 Rebecca Kelly Slaughter
 Christine S. Wilson

In the Matter of

**Corpus Christi Polymers LLC,
a limited liability company,**

**Alfa S.A.B. de C.V.,
a corporation,**

**Indorama Ventures Plc,
a corporation,**

**Aloke and Suchitra Lohia,
natural persons,**

and

**Far Eastern New Century Corporation,
a corporation.**

Docket No.

COMPLAINT

Pursuant to the provisions of the Federal Trade Commission Act (“FTC Act”), and by virtue of the authority vested in it by said Act, the Federal Trade Commission (“Commission”), having reason to believe that Respondent Corpus Christi Polymers LLC (“CCP”), a joint venture between corporate entities under the control of Respondents Alfa S.A.B. de C.V. (“DAK”), Indorama Ventures Plc (“Indorama”), controlled by Aloke and Suchitra Lohia, and Far Eastern New Century Corporation (“FENC”), intends to acquire certain assets from M&G Resins USA LLC and its affiliates (“M&G”) in bankruptcy, in violation of Section 5 of the FTC Act, as amended, 15 U.S.C. § 45, and which, if the acquisition is consummated, may substantially lessen competition in violation of Section 7 of the Clayton Act, 15 U.S.C. § 18, and Section 5 of the

III. PROPOSED ACQUISITION

7. Pursuant to an Asset Purchase Agreement dated March 28, 2018, CCP proposes to acquire

V. MARKET STRUCTURE

14. The market for the manufacture and sale of PET in North America is highly concentrated.

15. DAK, Indorama, and FENC are three of only four North American PET producers. Together, these three Respondents control nearly 90% of North American PET capacity. Upon completion, the Corpus Christi plant will be the largest PET plant in North America and will account for Body <</MCIDtor08oRwiNorth Amero(r)-0.9 (t)-6 () 6.5or ofront for

WHEREFORE, THE PREMISES CONSIDERED, the Federal Trade Commission on this _____ day of December, 2018, issues its complaint against Respondents.

By the Commission.

Donald S. Clark
Secretary

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