



STATE OF INDIANA
OFFICE OF THE ATTORNEY GENERAL

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GREG ZOELLER
INDIANA ATTORNEY GENERAL

March 14, 2013

Re: *State of Indiana, by Attorney General Greg Zoeller v. McWane Inc., Sigma Corp. and Star Pipe Products, Ltd.* (D.N.J., 12-cv-06667 (AET) (LHG))

Dear Mayor

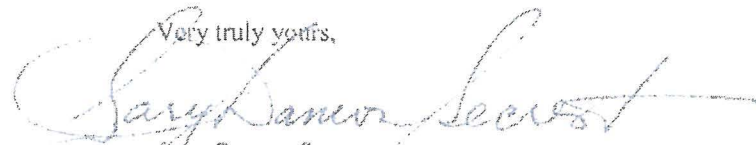
The Attorney General of Indiana is pursuing a civil antitrust lawsuit on behalf of Indiana political subdivisions, including _____ against Defendants McWane, Inc., Sigma Corp. and Star Pipe Products, Ltd. This legal action involves no financial cost to your community, but could result in a financial recovery that would benefit _____ Initially, it could appear this opportunity might not apply to your community; but I encourage you to have your public works personnel do a thoughtful review of your construction projects.

The Defendants are manufacturers and/or marketers of ductile iron pipe fittings ("DIPF"), which are used in pipeline systems that transport drinking water and wastewater in municipal distribution systems and treatment plants. In this suit, the Attorney General alleges that Defendants conspired to fix prices and monopolize the market for DIPF, so that municipalities, municipal water companies and other political subdivisions within Indiana that purchased DIPF for construction projects, including water projects, from the defendants, either directly or through a distributor or through a general contractor or sub contractors, paid higher prices than they would have paid had there been real competition.

In order to proceed with this action and to recover funds for _____ we need information about DIPF purchases by or on its behalf. To assist in this effort, we request that you identify construction projects (including all drinking water and/or wastewater projects) undertaken by _____ from the period January 1, 2008 to the present. In addition, at your earliest convenience, we need the name and contact information (email address, mailing address, and phone number) for any person or entity who is likely knowledgeable about purchases of DIPF for that project, including information about the location of documents regarding those purchases.

Please direct your response (information and any relevant materials) or questions to former Indiana Attorney General Steve Carter, who has been engaged for consulting purposes in this matter. A Response Form is enclosed for your convenience. Please forward the Response Form and any materials to him at stevecarter219@yahoo.com or reach him by phone at 317-997-7987. Thank you for your cooperation in this effort.

Very truly yours,



Gary Damon Secrest
Chief Deputy Attorney General

GDS:rsb



CONSTRUCTION PROJECT AND CONTACT INFORMATION RESPONSE FORM

OAG Form 1200 (R0 / 03-13)

- INSTRUCTIONS:**
1. Include the contact information for any person or entity who is likely knowledgeable about the purchase of ductile iron pipe fittings (DIPF) for the project, including information about the location of documents regarding those purchases.
 2. Identify each construction project (including all drinking water and/or wastewater projects) undertaken from the period of January 1, 2008 to the present.
 3. Please return this form and any attachments to the email address specified below. If you have any questions please email stevecarter219@yahoo.com or call 317-997-7987.

Construction Project(s)		
1.		
Notes/Comments		
Contact	Phone	Email Address
2.		
Notes/Comments		
Contact	Phone	Email Address
3.		
Notes/Comments		
Contact	Phone	Email Address
4.		
Notes/Comments		
Contact	Phone	Email Address
5.		
Notes/Comments		
Contact	Phone	Email Address