

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

**COMMISSIONERS: Maureen Ohlhausen, Acting Chairman
 Terrell McSweeney**

In the Matter of)
)
China National Chemical Corporation,) **Docket No. C-4610**
a corporation.)

COMPLAINT

4. Respondent and Syngenta are corporations and at all times relevant herein have, either directly or through their subsidiaries, been engaged in commerce, as “commerce” is defined in Section 1 of the Clayton Act, as amended, 15 U.S.C. § 12, and Section 4 of the FTC Act, as amended, 15 U.S.C. § 44.

II. THE PROPOSED ACQUISITION

5. Pursuant to an Agreement and Plan of Merger (“Merger Agreement”) dated February 2, 2016, ChemChina has agreed to cause China National Agrochemical Corporation Saturn (NL)

17. The Merger Agreement described in Paragraph 5 constitutes a violation of Section 5 of the FTC Act, as amended, 15 U.S.C. § 45.

WHEREFORE, THE PREMISES CONSIDERED, the Federal Trade Commission on this fourth day of April, 2017, issues its complaint against said Respondent.

By the Commission.

Donald S. Clark
Secretary

SEAL: