

August 21, 2010; *second revision*

To: Commissioners of the Federal Trade Commission
In the Matter of Intel Corporation FTC Docket 9341

c/o: Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

cc: Committee on Commerce, Science & Transportation, the U.S. Senate
Congressional subCommittee on Commerce, Trade, Consumer Protection
State Attorney Generals
Christine Varney, DOJ Antitrust
Michael Hertz, DOJ Criminal Fraud
Joyce Branda, DOJ Civil Fraud
Director Robert Mueller, FBI
Honorable Eric Holder, DOJ
Vice President Joseph Biden

Fm: Mike Bruzzone
Camp Marketing Consultancy
6025 McBryde Avenue
Richmond, CA 94805

Re: FTC Docket 9341 Comment on Proposed Settlement

- **Intel consumer & industrial monopoly recoverable grows to \$88 billion**
- \$42 billion subset due consumer return; \$43.827 billion industrial monopolization.
- **RICO proofs of Intel Insider stock trading & NASDAQ market rig.**
- Lettered Relator Seeks Attorney; FCA, 31 USC 3279, recovery of monopoly & fraudulent cost imposed on Federal Government's Intel based PC purchases.

Secretary Federal Trade Commission for Commissioners, Senators, Congressmen, State Attorney Generals, Antitrust Chief Varney, Mr. Hertz & Ms. Branda, FBI Director Mueller, Honorable U.S. Attorney General Holder, Vice President Biden:

Pursuant to Camp Marketing Consultancy ongoing Intel Network case assessment:
Consumer recoverable Intel Inside transport charge, monopoly price premium, industry monopolization on Intel economic and financial analysis grows total intent to monopolize recovery, by 12%, to \$88 billion.

Additionally Docket 9341 Intel production analysis across 23 consecutive short runs reveals minimum \$3.489 billion in MicroSoft operating system's monopolization. Industrial recoverable is associated with tying OS horizontally by OEM license to Intel x86 surplus microprocessors sold at a price less than Intel cost to produce.

With over two decades of computer related expertise, twelve years x86 microprocessor and PC products marketing employment experience, through 130 months providing Federal Trade Commission, Federal agencies, Senate and Congress, State and Federal Attorneys this research assessment documenting Intel market harms and costs imposed on consumers, industry, enterprises, individuals, society, States and Nations, my vantage on Docket 9341 proposed settlement agreement before public comment.

That entering into Bureau of Competition Docket 9341 proposed consent agreement with Intel Corporation would enable continued monopolization and non address of standing violations of Federal Law including antitrust, commerce and trade, racketeering, penal and securities law *by the Federal Trade Commission.*

Any ruling away from complete documentation of Docket 9341 case facts, in open proceedings, would deny the United States, American People, elected representatives in Congress and Senate the knowledge reference to act on the complete set of case facts.

Facts and data assembled through 130 months of research between the lines of Docket 9288, and now 9341, I trust verified by FTC in discovery and waiting to be documented through proceedings yet to be delivered. That is for a complete Intel situation analysis crucial for democracies' definition of anti trust law augments, including new Federal and State competition, commercial, civil and civil rights laws.

The Intel Corporation case matters are a green field for evolving constitutional, federal & state, competition, civil, labor & world human rights laws & legislation. This opportunity for evolution of man and human potential cannot be brushed aside.

Lacking complete record, competition and commerce and trade law evolution into the new millennium will be blocked here at Docket 9341. A misguided political twist too steer Congress and Senate away from whole assessment for whole remedies? Too overlook a closed technical guild's truly anticompetitive *by law* channel control and tying mechanisms? With Docket 9341 remedies overlooked two decades of dire system's effects on competition and society are clear. Continued Intel abuses if the matter's most urgent components are left unaddressed by FTC consent agreement as proposed.

And it's not like Bureau of Competition has to go back to the drawing board for detailing a complete assessment for all encompassing remedial framework. That capable of regulating one of technocracies greatest system failures; artificially accelerating and network directing industrial economies, enterprise values, the multiple lateral exclusions, vertical by horizontal structural restraints, financial and legal frauds, industrial inefficiencies, propagandist communication controls and covert security operations that must be examined to fully correct the core of these Intel case matters. A precedent setting case that crosses many traditional antitrust and commerce case matters. Where the knowledge of past antitrust cases is relied on by a constituent franchise to construct anticompetitive systems, in structure, on which the Intel and Microsoft integrated monopolies are sustained even now.

Further scuttling the full record of Docket 9341 case facts, through incomplete proceeding transcript, would deny cross profession FTC monitors complete case assessment for Intel system and structural ongoing audits under their charge. The key concern being how will any thoroughly audit for what they do not know about?

The nature of Intel Network artificially accelerated system structural manipulations, real time future time effects of technically novel market rigging systems, including notoriously destructive Intel Inside tied charge back deserve full Docket 9341 disclosure for Congressional and Senate law consideration. Only from full disclosure can Congress and Senate consider augments and new law legislation from the realities that are Intel Networked masked for much to long.

Break through or break down. For Commissioner's vote to rush over Bureau of Competition gapping holes, within a Docket 9341 negotiated settlement, would indicate a continued social system, law and democracy breakdown.

Vote no on Intel enculturation of democratic State.

Vote no on continued movement toward the dark side of corporate operation.

Vote no on Federal Trade Commission corporate legal services.

Noteworthy, Docket 9341 like Docket 9288 fails to specifically disclose and fully error correct real time future time margin ties that are the diamagnetic attractors of Intel structure. Driven on Intel artificial acceleration of production start's which continually moves this current time future time effect which is the Intel channel distribution bridge. A worm hole constantly morphing when Intel current time attractors lead's into future time enabling Intel Network to fix their future. Reliance on a two element value tie that is just one of many discoveries central to the Sherman Act Section 1 core of Docket 9341 which proves Section 2 intent to monopolize per se. Demonstrating along with other anti competitive restraints Intel's monopolization of many relevant markets from one microprocessor production short run too the next.

This leading attractor is an Intel and Media first. Two margin charges tied for their leading after effects. Classic antitrust restraints from sales agency that when combined with limiting mechanisms from other sciences morphs into something unique. Where market share allocation tied too a leading attractor today, offers 1st Tier Dealers a leading market share advantage into their Intel franchise future.

Where Microsoft riding this Intel PC Media tie, tied too Intel below cost surplus dumping destroys most of the Nation's independent software industry. And between the three culprits inhibits or wipes out many domestic microprocessor design developers and design manufacturers.

Whether to persuade or from incompleteness to steer Docket 9341 conclusion away from Sherman Act core facts, assures continued non regulation of these destructive current time future time practices by legal void. Invented by Intel for all too see, and now copy, a setting up of society for continued damages. A network tragedy of

secret scheme's that jump organic time on the weight of product and surplus value ties that destabilize enterprises and industries. Within the chaos of a planned industry concentration where the sales revenues of one company can be network directed by Media to another company on Intel Network system mechanics. Mechanics that have enabled a criminal gang to take system's control, to loot enterprises, industry, consumers, society, Nation's, capitalism and democracy, democracy and capitalism.

Known causes of Federal Action on Intel 9341 discovery and research assessment:

Sherman Act Section 1	Contract for horizontal combination as a restraint.
Sherman Act Section 1	Conspiracy to conceal contract & combination.
Sherman Act Section 2	Intent to monopolize and predatory conduct.
Clayton Act Part 2	Certainly discrimination & sabotage of facilities.
Clayton Act Part 3	Limiting by product routing; barricaded essential facility.
Clayton Act Part 4	Attacking competitor employees who refuse to participate.
Clayton Act Part 5	Unfair and deceptive practices.
Clayton Act Section 13c	Payment/acceptance commission compensation to route.
Clayton Act Section 13d	Payment for services or facilities for processing a sale.
Clayton Act Section 13e	Furnishing services or facilities for processing/handling.
Clayton Act Section 14	Pressed into agreement <i>not</i> to use competitor's goods.
USC 1961 RICO - 222	Cross enterprise, cross professional network crime.
USC 1341 US Mail Fraud	Consumer Route Fee paid on PCs mailed across State lines.
USC 1956 Laundering	Intel bribes paid to PC Companies recorded as revenues.
Corporate Procedure 1714.9	Attorney & Client conspiracy.
Penal Code 182	Crimes against public justice.

Known consumer and industrial financial recoveries calculated for 9341 discovery:

On analysis of Intel financials for misrepresented costs and economic analysis across 23 Intel production short run's; calculated on MDR Quanda by quarterly Intel production estimate, multiplied by Intel stated price.

\$44.173 billion *consumer cost of harms* on Intel intent to monopolize.

\$43.827 billion *industrial monopolization harms* on Intel intent to monopolize.

Economic calculations represent a partial four year subset of the 10 year Intel total production set within Docket 9341 review period.

Executive Review

Chartered to act under the laws of the United States for system, structural and economic reasons stated Bureau of Competition Docket 9341 negotiated settlement proposal in current form must be denied by Commissioners. Proposed consent agreement is insufficient under the environmental circumstances on fact, law precedent and Commission fiduciary responsibilities.

Sent back to the negotiating table where the future of democratic capitalism and a civil society are truly at stake. We cannot overlook all the major Intel Network System crimes or the fiduciary and governance breakdowns.

Including seven of the most hideous system crime categories;

- 1) Vertical by horizontal tying.**
- 2) Intel multiple laterals of combination.**
- 3) Intel tied charge through channel's metering devices.**
- 4) Intel Corporate plus Media tied sales attraction.**
- 5) Network political & jurist multipoint and consumer manipulations.**
- 6) Intel Insider Quanda stock and market rigging systems.**
- 7) Microsoft OS horizontally tied by OEM license to Intel below cost product.**

These seven categories of Intel systems deliver debilitating tendencies. System, social, and financial consequence's on competition, enterprise, industry, regulatory, law enforcement and protection, political body, Nation's stability, financial markets and capital creation potential. And continue to perpetuate hurdles in the way of system remedies from over 18 years of not owing up to many Intel and Microsoft antitrust violations, and concealing PC Media system crimes that have destroyed industries, competition and legitimate governance functions.

Accordingly back too the negotiating table for some Intel admittance. Or Docket 9341 should proceed too FTC hearing stage focused on Sherman Act Section 1 and Section 2 per se condemnations of law known under the Section 5 umbrella which is Docket 9341. Under either track address should continue on:

FTC Focus -

- 1) Competitor limiting by vertical restraints for multiple laterals of combination.**
- 2) Limited by horizontal contract in combinations including conspiracy to conceal.**
- 3) In combinations cartel routing & price fixing raising consumer PC price by 6%.**
- 4) In combinations monopoly price impact on consumers from media manipulation.**
- 5) Validate recovery for consumer monopoly price, routing & price fixing harms.**

Finally, for Docket 9341 in hearing too verify the criminal components of these competition case matters in proceeding transcript for Department of Justice timely follow on complaint;

DOJ Focus -

- 1) Recovering consumer monopoly price, product routing and price fixing harms.**
- 2) Prosecuting competition, commercial frauds and racketeering that are criminal components of the FTC Docket 9341 competition case violation's themselves.**

SEC Focus -

- 1) Documenting Accounting Fraud and with DOJ prosecuting Stock Market Rig.**

Invited by Bureau of Competition lead attorney to input as field reporter for Docket 9288 May 1998, now inputting to FTC Docket 9341 case team on Commissioner referral to case team under Department of Labor Code 3363.5¹, this analyst is the FTC's longest time Intel case expert. Bringing industry, direct witness, Docket 9288 and 9341 case work too the examination of Intel Network practices.

This expert finds Bureau of Competition Docket 9341 settlement proposal artfully crafted and diplomatically presented. But does not address standing violations of law, consumer recoveries from Intel competitive harms, market rigging, and remains ineffective on non address of the foundation causes of Intel monopoly which continue regardless.

This analyst finds Docket 9341 settlement proposal;

- 1) Artfully crafted too address and patch current industry competitor claims which I support and will address within my profession and case expertise herein.
- 2) Diplomatically presented too guard Commissioners and Commission employees from Intel Network retaliation including future employment blacklist, however, ineffective for guarding constitutional, employment, civil and human rights of witnesses who are case contributor's such as myself. Including continued blacklist, Intel, Intel Attorney and Security Operation's retaliation in a constructed fraud meant to obstruct justice, abuse court and Officers. Too conceal Intel Network crime including many forms of direct and indirect retaliation against *this Federal Reporter covered up and white washed by Officers, employees and agents of Intel Corporation, State and Assistant Attorney Generals of the State of California, other investigative and law enforcement.*

Which is what can happen to investigative reporters when a criminal clan buried into corporate enterprise, media, Bar, for two decades, take over critical decision and control functions within industry and State to loot it. Too protect and conceal their Network, to protect and conceal their looting, to protect and conceal their looters. No less than a citizen responsibility to report in this war zone and very scary looking back. Perhaps as scary looking ahead. Yet essential to reverse an eleven year sting from the encounters, interactions and counter intelligence retrieval now part of this record. So why a continued corporate political fraud meant to conceal Intel antitrust violations, RICO, industrial espionage, market, law, criminal fraud, civil fraud and jurist rigs?

Everyone has known about this Intel Network problem for a long, long time

- 3) Does not address Intel monopoly consumer harms, or financial recoveries calculated from those known causes which are core too the Commission's charter.
- 4) Similar to this analyst's Docket 9288 public comment a decade ago, that Docket 9341 settlement proposal will be ineffective for curbing Intel monopoly

¹ For oversight control and my protection from Intel Network retaliation under Federal Labor Law.

momentum & enabling the growing of industry competitor market share against an Intel illegally achieved process fabrication monopoly. Which is a current time infrastructure barrier now exponentially expanding which Docket 9341 remedy barely touches'. And whose remedy actually changes the dynamic of competition to some degree.

Specifically, Docket 9341 settlement proposal does nothing to address the history of Intel's monopoly derived surplus barrier, how and why it got that way, its cost on consumers, society and Nation, as a result of Intel defending that monopoly grown and sustained industrial surplus barrier from legitimate competition on the merits and where as proposed there are very limited 9341 remedial solutions.

On antitrust 3x a guesstimate of **Intel total harms** committed against economies, industries, enterprises, competition, consumers, society and Nation's = **\$264,000,000,000.**

Estimate Microsoft OS attach to Intel 1999 – 2002 < AFC Units of 72,697,900 quantity multiplied by \$50 estimate less \$2 manufacturing cost = \$3.489 Billion consumer recoverable.

Docket 9288 infiltrated by Intel confidence men who were witnesses for the FTC, ten years ago, did not resolve the Intel matter on diminutive causes concealing the major ones. How are diminutive remedies proposed in the current 9341 consent agreement any different for resolving the major ones today?

On specifics of the proposed settlement from analysis of proposed consent order:

Through first days writing on what proposed consent agreement includes for consumer and plaintiff's in the way of Intel competition controls, it became obvious comparing FTC Analysis of Proposed Consent Order, with the Order itself, that the really fascinating paths address what the Proposed Order *does not address and cannot control*. There's a lot left out.

First, consumers are harmed by Intel conduct, resulting in monopoly price impact and the illegal transport tax clandestinely charged to consumer PC purchases between 1993 and 2006. Nothing in Docket 9341 aims to recover for consumer harms or prevent consumer sales manipulation by Intel Networked including Media co-conspirators into the future.

Intel Network methods of monopoly and surplus market tying charges, for consumer manipulation, have stymied nascent innovations from growth, and established innovations from commercialization. Between Intel 286 too 386 microprocessor market transition and today, 22 years, the breadth of industry contributions for consumer microprocessor and PC product choices have been reduced. I've seen this having worked on or been exposed to some of the innovations quashed by Intel Network. Where ever Intel margin values are threatened Intel Network will quash competition and democracy.

Bureau of Competition states, "The Proposed Consent Order will bring immediate relief in the relevant markets and puts Intel under the Commissions order." Where those implementing the system have a great deal to do with that outcome. By leaving out many Docket 9341 findings which enable only the limited incomplete outcome proposed.

Certainly the order as proposed brings current time relief to **eight** industry competitors. However does nothing for recovering any of the long time consumer harms. Does not remedy any of the anticompetitive conduct left unaddressed. And even some that is addressed provides no remedy including **Part IV 3 B** which place competitors into less than sales parity with Intel. First, on the antitrust causes omitted from Docket 9341 action unaddressed by the commercial fraud 'sales' remedies alone. Second, on Intel manufacturing cost advantage from a monopoly built business infrastructure.

In this expert's opinion the proposed order is too plaintiff industrially limited to bring whole forms of relief. And does not protect consumers including in the relevant markets which are many more than the complaint addresses. The x86 microprocessor market and intra platform PC component's markets, Microsoft horizontally tied Windows platform and the effects on independent inter platform computing markets all need to be considered. All these markets are contained, limited and under control by Intel's process fabrication, x86 microprocessor and intra platform **monopolies** which continue regardless of the consent agreement.

Ironically proposed consent agreement does not regulate against any of the commercial forms of sales relief proposed if all competitors chose to adopt them. So where has the proposed consent agreement actually guarded competition, consumers, added to or evolved industry antitrust science or competition regulation? That answer is no where.

Docket 9341 proposed consent patches up certain current time industrial competitor harms on Intel conduct which this analyst supports. The order does not address or resolve the systematic dismantling of enterprises, industries, markets, society and Nation's economic potentials by Intel. Or Intel combination and cartel subset's in a cross enterprise, cross profession organized crime ring. With some of the most notorious examples including Intel Network direction of production values, predatory product dumping, multiple laterals of combination including corporate plus media combination in a tied sales system, and the market rigging Quanda left unaddressed. Proposed consent agreement leaves total set of causes out and complete remedies incomplete.

The order "seeks to undo the effects of Intel's past restraints on *industry competition* by enhancing the ability of AMD, NVidia, VIA and others to compete effectively with Intel;

- 1) To make it easier for AMD, NVidia and VIA to use third party foundries to manufacturer products for them.
- 2) To give AMD, NVidia and VIA flexibility to secure modifications to change of control provisions in their Licensing Agreements with Intel.
- 3) To extend VIA a 5 year Intel intellectual property license.

- 4) To provide 6 year assurance to plaintiffs of complimentary and peripheral products that they will be able to connect their devices to Intel CPUs.
- 5) For FTC to manage intellectual property infringement claims, commercial distribution frauds and contract disputes for up to 10 years.

On remedies Bureau of Competition states “these provisions compel Intel to make certain offers; they do not compel a third party to accept them. The goal is to require Intel to open the door to renewed competition, not to force a third party to take any particular action”. So remedies are all on a negotiated basis among the industry parties with FTC administrative oversight.

Plaintiff and industrially limited, proposed consent agreement does not address and therefore does not undo the effects of two decades of Intel monopoly restraints, on industry, on consumers including the Federal and State governments. That is throughout the Docket 9341 review period which is January 1, 1999 through too now.

For Bureau of Competition to even suggest that the very narrow limits of Docket 9341 industrial focus addresses, and could “undo the monopoly effects” of Intel sustained restraints, the now multi segmented product category hurdles, surplus barrier and fabrication monopoly which are the result of two decade’s of multiple laterals of vertically tied dealing combinations, is absurd.

With all the Section 1, industry, channel, racketeering and cartel proofs is even more so.

Remedies for Industry Plaintiffs

For industry plaintiff **Part III** of the order does patch over some real time claims including foundry immunity from Intel patent suit over products and technology cross license questions and disagreements; between Intel and plaintiffs only and their chip stage manufacturing foundries. No foundry wants to be sued for contract fabrication of a customer’s products that might infringe another firm’s patents, lacking appropriate license provisions, which this remedy is designed to address.

Consequently proposed consent agreement’s big winners, in fact, are not consumers or the independent plaintiffs themselves but their independent foundry partners who now get a clean opportunity to displace the Intel monopoly derived surplus barrier. Those are TSMC and UMC in Taiwan, Global Foundries in Germany and Taiwan, SMIC in China and IBM in Vermont and New York.

Beyond prototype or short run fabrication operations, there is currently no merchant leading edge commercial logic lithography process located in the United States beyond Intel facilities. IBM is primarily a short run captive operation. Global Foundries has broken ground for a commercial facility in State of New York. There is other worldwide leading edge logic process availability but none specifically tuned for x86 microprocessor fabrication. There is leading process lithography for memory and legacy process for analog fabrication located in the United States.

Looking forward there are no Intel conditions within Docket 9341 addressing Intel's reintegration of a fabrication industry into the United States which the Intel monopoly is responsible for destroying. Holding municipalities to ransom Intel continues to threaten move offshore. No remedy in docket 9341 addresses the \$43.827 billion in industrial monopolization stolen from competitive enterprises, by Intel, for their recovery and competitive reinvestment in semiconductor fabrication back into the domestic economy.

Proposed consent agreement continues **Under Part II A through D** to enable connection of plaintiffs peripheral components to Intel central processing units; through the PCIe standard, which in period will become obsolete for keeping up with processor memory bus throughput requirement; in processor, to coprocessor or accelerator. Thus limiting future time competitive connection primarily too input output subsystems like storage. Everyone will need to design and implement their own AMD Hypertransport® HTX and Intel Quick Path® like processor direct bus implementations or license them.

Under this provision Intel continues to block competitive access to the North Bridge microprocessor to main memory control subsystem. That is to push competition away from an Intel control block using the second control subsystem, South Bridge, as an Intel negotiating chip. South Bridge is the peripheral input and output connection into the microprocessor main memory core sub system.

Intel reason for push away is simple, competitive access to the North Bridge sub system enables microprocessor substitute competition directly at the microprocessor socket level. And graphics component sub system replacement competition at the microprocessor system bus level.

In other words any microprocessor company can compete for substitution within that PC main board socket, with Intel, when the PC main board is designed to fit all x86 instruction set compliant microprocessors. And any graphics subsystem can compete for replacing Intel graphic options when the microprocessor system bus is openly accessible.

At the microprocessor level the good of socket substitution is truly an open market commodity PC. The bad is margin commoditization for main boards and the class of microprocessors generally designed for them. Typically lower priced given the multi competitor effects and scale economy of basically one main board designed to fit all. Especially true when Intel dumps these class of microprocessors on competitors at or below cost. No wonder ARM constituency is aimed to win world PC for the masses.

Given this Intel North Bridge IP block, since 1998 mainstream x86 microprocessors have moved away from substitutes; referred to in industry as 'socket stealers', to incorporate their own patent protected North Bridge main memory to microprocessor control system.

NexGen initially and then AMD with Hyper Transport lead in this 'replacement platform' evolution away from the open Socket 7 PC standard. And today all AMD x86 instruction set compliant processors require a main board specifically designed for them which is the HyperTransport bus open licensee able which can talk through PCI lanes from microprocessor to graphics subsystem.

Product Segment Aggregate x86 Compliant Microprocessor Market Share

	<u>2Q 09</u>	<u>3Q09</u>	<u>4Q09</u>	<u>1Q10</u>	<u>2Q10</u>
Intel	78.9	81.1	80.5	81.0	80.7
AMD	20.6	18.7	19.4	18.8	19.0
VIA	0.5	0.2	0.1	0.2	0.3

Source: International Data Corporation, August 2010

The pro for HyperTransport open system specification is widely accepted performance. Con is HyperTransport main board production economies are tied to AMD approximate microprocessor share of 20% in relation to Intel's 80% share. From a producer's standpoint main boards for Intel microprocessors have much greater manufacturing scale economies on cost for price. This pegs Nvidia head to head with AMD ATI unless an Intel compatible board products license opens up that 80% of the market.

There are pros and cons for platform replacements. The pro is no socket stealing PC commoditization, although, the nature of this type of competition is most competitive and very consumer friendly from a price standpoint. The con is all industrial sales margins are reduced unless an informal price floor is observed. The consumer may also realize fewer evolutionary enhancements to the PC's system bus compared to optimized variants of the HT standard or Intel Quick Path option that can offer higher sales margin potentials from their individual enterprise optimizations. Although, Socket 7 PC delivered the same sort of competitive system bus frequency improvements which Intel always lagged.

Under Part III consent agreement extends VIA current license to attach to Intel microprocessors, through PCIe, for 5 years. And provides third party immunity from Intel patent infringement suit for 30 days during any other enterprise's initial acquisition talks with VIA and then up to one year following acquisition.

For VIA lacking access to Intel North Bridge license and tied to its own 0.03% market share, means Socket 370 or another system bus option or be pigeon holed within its own microprocessor share tied to its own main board production. Access too PCI connect to Intel processor main memory system offers VIA and Nvidia a five year development Window to somewhere else. Regardless a very real barrier remains and that is VIA competing with its own customer base, with its own processor plus main board design, against Intel and compatible board designs that are 99.7% more. For Nvidia the hurdle is being placed outside of Intel platform graphics co-development by Intel.

The big question is do VIA and Nvidia merge? Nvidia lacks a commercial x86 microprocessor. VIA lacks high performance graphic's components. Sounds like a complimentary relationship? And is FTC being played to play match maker? A creative but very costly Bar divergence from Docket 9341 core antitrust claim's by some members refocusing the case from consumers and social considerations, to their own considerations? Politically if this is a divergence too confuse society is about to lose.

Plaintiffs do have cause. And if denied Intel platform license access Nvidia essentially ends up in the same boat as VIA, competing with AMD ATI graphics subsidiary on 20% of all AMD compatible PC main boards. Or against Intel on PCI track or Quick Path license; if a license is obtainable, and only if an Intel based PC BIOS recognizes the Nvidia graphics option, and Intel hands over system control on OEM pre-configuration or user specification at system set up.

For AMD, VIA and Nvidia consent proposal further addresses Intel reconfiguration of product platform licensing field, and platform access for complimentary component computer product planning.

Under Parts V and VI Intel must provide plaintiffs a real 5 year product platform plan similar to other Intel compliments. Plaintiffs receive a negotiation position with Intel on the effects of those plans and Intel reconfiguration of the plan including knowledge of x86 instruction set extensions. All which impact competitor investment, access and continued computer industry participation. Negotiation stale mates apparently go back to the FTC for the next decade. So will the FTC be hiring more engineers who are contract attorneys? And is this truly the FTC's mission?

Rigged Benchmarks

On deceptive practices, **under Part VII**, consent agreement requires Intel within 90 days, to inform the market at large that its own software application program compilers are optimized for Intel microprocessor architectures, and not for competitive microprocessor architectures.

Nothing in the agreement requires Intel or a third party software tool developers to rewrite Intel compilers too recognize both Intel and competitor's unique architectural implementations, and to enable them 'turned on' when software applications are run using these compiled applications. Which include computer system benchmarks for establishing real time processor sub system and central processing unit performance capabilities.

Nor does the proposal require third party software developers including Media benchmark and software application operations, to pass along this required Intel disclosure. And does nothing to assure that Media and other influencers will rig their own benchmark suites too favor Intel microprocessors and misreport the performance of competitive processors. Which under the proposal might occur even more on both sides of the debate leaving consumer's even more in the middle for determining what computer product solutions actual do for them.

Bureau of Competition states "the proposed Consent Order is designed to protect the ability of customers and existing and future Intel competitors to engage in mutually beneficial trade." Here Docket 9288 and next 130 months of case research incorporated into Docket 9341 really comes into play.

Beneficial Trade

Under Part IV A & B, proposal addresses activities affecting commerce including licensing, development, production, manufacture, marketing, promotion, purchase or sale, and certain Intel pricing and bidding practices. Where this expert specializes in market(ing) restraints, economic and communications controls within CDOJ defined Section 1 strategy of per se condemnation, this comment will focus on market and commerce aspects of proposed Intel Docket 9341 consent agreement.

Proposed consent agreement states “respondents shall not invite, enter into, implement, continue, enforce, or attempt to enter into, implement, continue or enforce, any condition, policy, practice, agreement, contract, understanding, or any other requirement that conditions any benefit to a PC OEM or PC end user”.

Sounds all encompassing, however, reviewing provisions within the proposed consent agreement fails to address many Intel practices. Those are the classic antitrust practices that enable Intel too condition a benefit to purchases, to exclude competitors, to artificially maintain or raise consumer PC prices.

Conditional benefits that are addressed in proposal prevent;

- a) Intel offering value rewards in exchange for exclusive PC OEM, partner and channel commitments on purchase requirements.
- b) Intel bribes to PC OEMs for stalling out and/or discontinuing their competitive microprocessor based PC product introductions and platform developments.
- c) Payoff's to PC OEMs for blocking, countering, removing competitor component and product line tapers into what are primarily an OEM Intel PC product line up.
- d) Withholding PC OEM incentive values when competitive components are incorporated in PC platform including branded to compliment Intel components in that platform.
- e) To prevent Intel from focused targeting to eliminate a competitive component stronghold earned on competitor's product technical merits.
- f) To prevent Intel from selling any product or bundle of products below cost.
- g) Limits Intel to 10 PC OEM relationships over next 10 years where only new product development investment can be tied exclusively to Intel component purchases.
- h) Limits Intel to single bid focus and prevents conditioning any one bid on volume purchase using the leading attractor of progressive discounts on future purchases.

- i) Forbids the progressive retroactive discount and sales reward; 1st Dollar and Loyalty Payments, for PC OEM kickback on unit, segment, product category, platform milestone attainments after the initial sale.
- j) Forbids allocation of free units on milestone attainment; unless competitor is engaged in the exact same practice in anyone specific sales negotiation. With the sole exception of Intel 10% reward on no more than 10 maximum units; buy 10 get 1 free on the standard Intel VAR Boxed program.
- k) Proposal here forward mandates Intel to a volume price discount schedule for real time orders at specific volume breaks.

Noteworthy, **under Section IV B 3**, any of the above conditional limits placed on Intel, are nullified, if Intel believes any of these forms of conditional benefits are being offered by a rival component supplier. And if every supplier chooses to utilize these restraints all can use them regardless of the terms of this proposed consent agreement. Proposed consent agreement does little to regulate industry 'restraint free' competition over the long term despite FTC placing Intel under *up to* 10 years of oversight administration.

Further proposed consent agreement addresses only after the milestone forms of sales rebates and lump sum loyalty rewards. **Under Section IV B 1**, in fact, "Intel is not prohibited from conditioning benefits on sales terms not expressly prohibited by the order." Only Dealer rewards that are retroactive after the milestone progressive rebates or discounts, or the upfront bribes and kickbacks designed too exclude competition in the here and now are included. On this kickback finding, by the way, GSA False Claims Act recovery is proven in part.

Docket 9341, similar to Docket 9288, again negates direct address on those forms of rebates with current and future time lag effects. Those supporting closed loop vertical value stream maintenance, program catalysts for multiple laterals of combination, the dual value rebated fee scheme, tied product channel throughput registering mechanisms including destructive Intel Inside tied charge back and preferred Dealer product bridging. All these forms of anticompetitive schemes raise rival costs and limit consumer choice. And their competitive address is deleted from Docket 9341 review and remedies. Proposal addresses commercial fraud but none of the long term antitrust causes of action.

In fact the proposal negates to address any of the causes or competition problems from Intel Dealership and Media Sales Agency throughout the entire period of Docket 9341 review. Except that **under Part IV B 3c** consent proposal does limit PC OEM Intel margin reward claims within one year of the purchase. This addresses some of the real time future time effects, but none of the known limiting restraints, their causes and debilitating affects on competition and consumers. Docket 9341 avoids, in facts steers away from all of Intel Network's standing Clayton Act, and Sherman Act Section One and Two per se condemnations of law. For a fiduciary oversight so obvious this analyst must ask why?

Nothing in the proposed consent agreement specifically prevents Intel implementation of real time future time ties within a one year period. That period is not in calendar, but a rolling period, that can then cross Intel product introductions leaving the springboard for margin values earned on last product generation to launch any number of next generation products. This has always been a traditional limiter associated with Intel Inside rebated fee tied charge back.

So nothing in the proposed consent agreement would prevent reemergence of the notoriously destructive Intel Inside vertical by horizontal sales tying and metering systems, their real time future time competitor concentration effects, the consumer manipulation techniques, costs and harms.

The real eye opener is that Docket 9341 proposed consent agreement addresses the commercial channel frauds, but none of the last decade's traditional anticompetitive conduct under the Sherman Act or Clayton Act. And appears too skip entirely over anticompetitive conduct per se condemned by the Sherman and Clayton Act.

While upfront bribes and kickbacks are certainly a fraud, there is no Section 2 case precedent specifically condemning an 80% market share monopolist from buying the remaining 20% of a competitive duopolist's market share with channel loyalty rewards, bribes and kickbacks. Since there has been no hearing on this specific Section 2 subject the task is left unaddressed and not complete. So why not address it in hearing?

On the other hand there is substantial precedent that vertical by horizontal combinations are per se illegal under Section 1. Including Intel novel forms of value tie's associated with antitrust case precedent on sales agency. Intel Network matters show many of the vertical system restraints on lateral structures that form the Intel horizontal combinations.

Here's where competition and commerce law can really evolve on these many Intel firsts. Firsts which are the gray areas of condemned marketing and sales practices from over one hundred years of competition case precedent. Which is why as a marketing practitioner antitrust law is interesting to me. It's all about the gray areas of going to market. About when enterprise's cross the competitive line of going to market or going in too racketeering together.

Beyond the presumed 9341 umbrella of intent to monopolize there has been no hearing. Absolutely zip of this proposed order addresses specific Sherman and Clayton Act condemnation's which are many despite FTC claim of resolving on exclusive limits. And that too me is an astonishing statement on why Bureau of Competition, including Department of Justice, need to join up and go back to the negotiating table with Intel. Not necessarily to rework what has been agreed. But too extend on the agreement to the situation analyses whole remedies.

No where in Docket 9341 proposed consent agreement are consumer price fixing or the combined multi laterals of Intel Dealership and Media Sales Agency addressed. With the exception; **Part IV B 8**, where Intel may negotiate exclusive component sales where

there has been extraordinary development assistance; minimum \$50 million, for Intel new product segments only, and to no more than 2 customers per year over 10 years.

Thus this provision actually establishes the foundation for an entirely reborn form of Intel platform dealing group. And disregards Intel's current and ongoing storage subsystem licensing and contract main board manufacturing deal's which include exclusive provisions.

Like any conspiracy the scheme only requires 2 unique players operating in a vertical or horizontal relationship. Intel Dealers operating in horizontal combination have traditionally been a minimum of 3 PC OEM channel entry points tied to their respective Media Sales Agent channel exit points. Intel product volume passing across this channel bridge is what widens the Dealing Group to more participants operating across tied market laterals in accelerated Intel time.

From 1987 through 2008 docket 9341 research shows a minimum of 3 PC OEMs vertically conditioned by Intel into a horizontal combination tied vertically again to their lateral of Intel Sales Agent channels, including a media cartel, operating in combination with Intel and channel entry points. All are Intel Dealers. Nothing in Docket 9341 addresses these facts. In fact, like Docket 9288, Intel Network again seems to be covering this up in Docket 9341 and that is the atrocity of enterprise network corruption.

Docket 9341 proposed consent agreement leaves Section 1 and 2 including per se violations unaddressed. Subsequently sufficient reason for Commissioner's to deny consent proposal under Anti Trust Act § 5 in the consent proposal's current form.

Under **Part IV B 3** consent proposal goes on to address conditional benefits Intel *can provide* relative to competitor product sales offerings.

- a) Intel may offer benefits similar to competitor benefits on the same type and quantity of products competitor is offering that customer is wanting.
- b) The sole differentiator being that Intel may offer **no exclusivity clauses** for purchase regardless of whether or not competitor's product sales offer include exclusivity provision.
- c) Intel cannot offer sales benefits attached to purchase for more than one year. No provision is made for within year, rolling calendar, or across product generations.
- d) Intel may condition bid on purchase for a minimum number of units only.

Under **Part IV B 4**, nothing in order prevents Intel from winning all of a customer's business so long as the Intel offer meets the customer's exact bid specification including volume with any discount break(s) spelled out in contract up front.

Sans the payola restraints outlawed in **Part IV A**, the **Part IV B** restrictions change very little the terms of Intel salesmanship vis-à-vis competitors. In fact moots the longest time and most relied upon competitor advantage. That is selling customers the marginal utility

value of a product that performs 5 to 10 % less than Intel product for 10 to 20% less than Intel price. Because under the terms of the proposed consent agreement Intel can now match that competitive price and benefit package *without competitive question*; unless there is a below cost question.

Ironically the proposed consent agreement places competitors into less than a parity sales condition with Intel. Intel Network has placed competitors into Parity before where the P-Rating benchmark system is a foremost example. Intel Judo placing competitors in parity with Intel Network destroys competition in the marketplace. In this particular sales instance limiting competitive product sale's differentiation to solely a technically superior performing product, or combination of products, for the same as the Intel price.

This appears quite rational of course. And is exactly what a remedy should address, that Intel cannot limit competitive sales of technically superior products with conditional sales benefits that impact competitive sales price performance. Yet, for this one concession in relation to all proposed concessions provided to Intel more than flattens the sales field in Intel's favor. Essentially reversing a lot of what industry has learned about selling against Intel. And that is because Intel monopolization means Intel can always sell at a lower price that is still above their fixed cost.

Intel price can always be used to eliminate most competitive product performance differentiators; especially when Intel offers a lower price regardless of competitor performance on any bundle of benefits. On sales parity the supply chain has always chosen Intel on availability of supply, main board economies of production, brand recognition produced by Intel Inside, and Intel Inside tied charge back's ability to throttle tied products down sales channels in network directed field effects.

On parity performance and a lower price Intel *will always win* the supply relationship.

On parity performance and equal price Intel *will most always win* the supply relationship.

On competitor superior performance and parity price against Intel anticompetitive restraints that are a real time future time tie, not addressed in Docket 9341, *Intel Network has always won the supply relationship*.

Intel manufacturing scale economies built up into the monopoly over 20 years of illegal market competition and sales practices cannot be eclipsed by any Intel competitor. In any one sales negotiation, Intel price can always be less than any of the plaintiffs and still above Intel's average fixed cost; on a three month rolling basis as the proposal defines.

Leaving competitor's only capable of competing on superior product performance that are their technical merit's for the same Intel sales package price. Which is what plaintiffs seem too want. That a competitor who offers a technically superior product against Intel on performance merits; applications processing throughput, processor speed, low power, effective package/footprint, bundles and price, suffered from Intel exclusionary price schemes benefiting commercial channels of product integration and distribution. Where Intel commercial frauds exclude competitive products from competing on their technical merit's within platform integration and distribution channels.

On superior competitor performance at Intel parity price, *competitor may win* the supply relationship. Dependent on if the PC OEM sees some long term, sustainable product category or segment performance and margin benefit from competitive component specification.

This is where the question of supply and allocation traditionally comes into play. For competitor survival against Intel this mean's never spreading supply among the customer base too thin. Enterprise sustainability against Intel is always secured from the mass of the component company's supporting constituency. Constituents including customers that are either above being bought by Intel or cannot be bought off by Intel.

The proposed consent agreements 'parity sales' clause is not a remedy where Intel price can always be less on monopoly scale, yet more then fixed cost. Or, where the truly destructive anticompetitive restraints not addressed in Docket 9341 are used by Intel lacking condemnation and control under the proposed consent agreement.

Plaintiffs have given up a lot in relation to solving some license, contract and sales disputes with Intel. That is by being placed into what can be less than sales parity. Including vulnerability too all the traditional antitrust schemes not addressed and not remedied within proposed consent agreement. So the question remains have enterprises, industries, consumers, States and Nations actually been protected by proposed consent agreement? This analyst believes partially, but not completely if FTC somehow voids their Congressional reason for competitive existence.

Conclusion

Has Bureau of Competition been misguided by some Intel influencers; within the Bar? Some supposed witnesses or experts meant to reverse the obvious? Similar to Docket 9288 and Paul vs. Intel consumer class action, has Intel Network steered Docket 9341 remedies away from the major industry and consumer recoverable to the minor industrial foreseeable? Redirecting the antitrust case into a frauds minor divergence? A way to address some fact's while leaving many antitrust facts out.

And if Bureau of Competition needs help, join in. It's well known that Intel Network will surround a group with influencers to get their way. Cognizance of Intel network manipulation techniques is always a learning hurdle for newbie's to Intel Nation and Intel law. That is to recover our Nation's Law for everyone.

Recognizing the long time network market rig presents a professional hurdle for attorneys, and if for Bureau of Competition attorneys then let's address that hurdle. By DOJ, Federal and State's Attorneys joining in with FTC for competitive mass over Intel Networked.

With Bureau of Competition address on plaintiff's fraud and contract disputes, FTC should move Docket 9341 to 1st amended complaint. Preparing for DOJ too enter the matter anticipating movement to hearing stage and criminal prosecution. For a RICO case why would there every have been any other way?

There is too much evidence now across the Weiss Lurie Stockholder Class Action, Paul Class Action, AMD vs. Intel and FTC Docket 9341 and 9288 that Intel Network has been influencing decisions to rig their way. That can include bar, jurist and witness manipulation. Cooperative, or under threat, or out of ignorance I do not know. But the repeating patterns from two decades of Intel Network influences continue to support this analysis.

Lurie Weiss knew that Intel BOD documents indicate awareness of internal organized crime. Paul class action was aware of Intel Inside tied charge back including prior 14 months where that knowledge was again overlooked. AMD holds system structure, economic and RICO proofs but did not present them in their recent litigation with Intel.

Mismanaged, blown or thrown? How about insufficient mass and limited reference for competing against Intel Networked?

So here's to recognizing needed Federal and State assistance too address the core of Docket 9341 Sherman, Clayton Act and RICO violations. That is Federal and State Attorney's paralleling FTC. To take on portions of the case matter for discovery implementing toward complete set of remedies including recovery of consumer antitrust financial harms.

For reasons stated herein Docket 9341 consent proposal should be accepted in part for plaintiffs sales remedies, but denied by Commissioners; sent back for further consumer harm and antitrust documentation and implementing on the antitrust remedies.

Proposed consent agreement in current form misses harms leaving incomplete and non existent remedies which promote Intel market monopolization, system rigs and consumer harms in violation of Section 5 of the Antitrust Act, the Sherman and Clayton Acts.

FTC, DOJ and States are responsible to resolve Intel Network crime. Sufficient Nations' mass too forever resolve these Intel case matters for society, democracy and open market capitalism. Too remedy Intel Nation. A two page list of attachments follows.

Respectfully Submitted,

~~Mike Bruzzone~~
Camp Marketing

**FBI Original Source of Intel Network RICO; 1996
FTC Invited field reporter Docket 9288, 1998-2000
CDOJ and NYDOJ first to report
1998, CDOJ lettered to work report; Intel Section 1 Framework 2000 –
SEC Notice; 2007
U.S. Attorney NCD recognized FCA Relator; 2008**

Exhibits in Attachment; page 1 of 2

Bruzzone Project Capability & Resume

FTC Syllabus of Intel primary and secondary case research;
Assessment and Models of Technical Business Systems

To SEC, Senate, Congress, State AGs, States Attorneys. FTC, FBI. DOJ, White House
Intel Corporation Competition Case Update of July 4, 2010

Journalism Oversight for Democracy Prerequisite; August 2010

To States Attorneys, State AGS, Senate, Congress, FTC, FBI. DOJ, White House
Intel Corporation Competition Case Update of September 30, 2009

To State AGs, Senate, Congress, ACLU, FTC, DOJ, FBI. CIA. HLS, White House
Intel Corporation Competition Case Update of March 11, 2009

To FTC Commissioners, Senate, Congress, State AGs, FTC
Intel Competition Case Update of October 15, 2008

To NAAG, Senate, FBI, CIA, FTC, SEC, Congress
Intel Corporation Competition Case Update for Media Version; November 1, 2007

FTC acknowledgement Bruzzone's Intel Antitrust Notice; January 1, 2007.

To Senate, Department of Justice, State AGs, CIA, HLS, ACLU, Joint Chiefs, SIA
Competition Case Update of November 1, 2001

To National Association of Attorney Generals; February 27, 2001

For FTC; Intel Discovery, Invention, Adaptation, Application, Connection; August 2000

For FTC; Antitrust compliance of anticompetitive activity; August 2000

CDOJ lettered to Intel case work report by Chief Assistant AG; March 21, 2000

To Department of Justice Notice November 11, 1999 and February 1, 2000

FTC acknowledgement Bruzzone Docket 9288 Public Comment; May 19, 1999

For FTC; Docket 9288 Remedy Intel System anticompetitive practices; April 1, 1999

To FTC Morgan / Bresnahan expert proofs; August 23, 1999

Exhibits in Attachment; page 2 of 2

For FTC Intel Structural Manipulation, Component Jugular, Integrated / Disintegrated;
March 12, 1999

To CDOJ on identification of Intel horizontal dealer combination; March 9, 1999

For FTC Network effect is like a magnet; March 5, 1999

CDOJ acknowledgement Bruzzone report of Intel competition violations, 12/1/1998

Intel BOD acknowledgement; cease and desist anticompetitive conduct and Federal
Reporter Tampering; 9/9/1998. Intel Confidential Document Subject to Protective Order
#12050DOC00076.

Intel BOD acknowledgement; cease and desist anticompetitive conduct and Federal
Reporter Tampering; 9/1/1998. Intel Confidential Document Subject to Protective Order
#12050DOC00078.

FTC acknowledgement Bruzzone correspondence to Messrs. Pitofksy, Lin; 9/22/1998

NYDOJ acknowledgement Bruzzone report of Intel competition violations; 8/17/1998
One of two in time period.

Intel contract for Bruzzone too provide Intel description of anticompetitive conduct
experienced in field; 8/8/1997.

Intel production noting "Intel Capital has home bugged" 9/7/?
Intel Confidential Subject to Protective Order

Bruzzone 1st FBI report; Intel anticompetitive practices, espionage, retaliation 10/11/96

Bruzzone AMD Internal marketing document Intel Inside market barrier; May 20, 1996.
Intel Confidential Document Subject to Protective Order #12052DOC00549.

== * * * * *

MIKE BRUZZONE – PROJECT CAPABILITY - 415/250-4652 - Campmkting@aol.com

**Kai-zen management method, practitioner of Benkyou, gets the job done.
Specializing in operational research, market relations, segment management,
product, market plan, program & team building, competitive strategy.**

- 2010 11th year intervening lobbyist FTC Docket 9288, 9341 U.S. vs. Intel; case analysis & investigative reports for U.S. Senate, Congress, National Association of Attorney Generals, Nation's governance publications, technology industry, business and financial press.
- Attend multiple conferences & symposiums annually.
- 2008 Recognized as Relator by U.S. District Attorney Northern California; Intel Corp. False Claims Act Recovery.
- 2004-07 Global Management Masters Program; Dominican University of California.
- 2003 Camp Marketing Brief celebrates 5th year; industry competition policy analysis for government.
- 2001 For FTC & CDOJ Intel Corp. strategy, x86/PC system's analysis through lens of ten disciplines; law, economics, industrial management, cybernetics, general system's, value theory, system psychology, network dynamics, analysis of responsible science in technocracy: 1926-02, communications science.
- 2000 Convergence PC start-up; internal audit, device product, market strategy.
- Intel x86 production, marginal revenue analysis; 1993-99, client requesting anonymity.
- CDOJ lettered to work report by Assistant State Attorney General; define Intel Section 1 case Framework.
- 1999 Channel assignment monitoring K6 CPU price support ahead of AMD Athlon CPU introduction.
- Fifty five page overview on Intel competitive strategy for FTC, U.S. vs. Intel; docket 9288.
- Consultant to VP Marketing at Tyan Computer; plan to move PR in-house.
- 1998 IDT/Centaur WinChip market evangelist and Intel competitive strategist to VP Marketing and CEO.
- Consultation to Federal Trade Commission on Alpha, AMD, ARM, Intel.
- 1997 IDT/Centaur WinChip C6 launch; market segment, communication strategy and tactical planning.
- PC paradigm transition & Intel camp migration for VP Corporate Marketing at Adaptec.
- 64-bit CPU analysis assessing viability of Alpha architecture for CEO, EVP Samsung Electronics; matrix audit triangulates on Alpha viability down 10 levels of supply chain and across 400 inputs.

- 1996 Participant in NexGen/AMD Merger; Marketing Director, PC User Group Evangelism.
Developed and managed media placement for NexGen "Pick our Brains" advertising campaign. Toured for field reporting within tens of domestic regional PC markets
- 1995 Market turn-around positioning NexGen for merger with AMD; Nx586 platform commercialization.
- 1994-95 Coordination of ARM licensees into one of the first "hot groups" of eight competitors.
MPEG Now segment strategy to get rid of Intel Indeo for C-Cube Microsystems.
Nx586 segment entry strategy, IPO competitive counter and CPU launch plan.
- 1993 Vice President Hill & Knowlton Public Relations.
- 1992-93 Director Marketing Communications & PR for Cyrix.
Introduced first non-Intel CPU Upgrade; Cx386 to 486.
Launch and roll out; Cx87SLC, Cx486SLC, 486DLC, 486S.
Cyrix communication management 9 months under IPO quiet period in duopoly market.
Developed and managed media placement for Cyrix Intel-ligent Alternative ad campaign
Managed development and lead media negotiations for Cyrix Instead advertising campaign.
Secured 5 edit awards for Cyrix processors, > 50% awareness, 5% x86 notebook share.
- 1991-92 Introduced first non-Intel 486 pin-out processor: Cyrix 486S
Introduced first non-Intel 486: Cyrix 486SLC and Cyrix 486DLC.
Introduced first non-Intel embedded math co-processor: Cyrix 87SLC.
- 1991 Director Corporate Communications for PC OEM Arche Technologies.
Introduced 486 PC family, first PC Standard Symmetrical Multiprocessor.
Secured numerous product awards; Cadalyst, Byte, PC World.
- 1990 Introduced 386 PC family, promoted fastest 386-33 system in class; Legacy 386-33.
- 1989 Managed promotion of RJR Nabisco's Salem ProSail Series, San Francisco Event.
- 1988 Managed Nike sponsorship of US Admirals Cup Team.
- 1987 Director of Corporate Communications Orchid Technology; IPO.
Introduced first PS/2 memory card; Ramquest
Established first marketing alliance; Autodesk.
Rolled out first 2.5D graphics card: Orchid Turbo PGA.
- 1981 Graduate of San Jose State University; BA in advertising.
Dominican University; Masters in Business Management
Hobbies: Sailboat Racing, Mountain Biking.

* * * * *

By Invitation



May 1998

Assessment and Models of Technical Business Systems, seen through Field, Primary & Secondary Research.

Mike Bruzzone

Managing Director
Camp Marketing Consultancy

Partial list of primary research, undertaken and completed by lettered invitation on behalf of the Federal Trade Commission, Bureau of Competition followed by Office of the California State Attorney General.

May 10, 1998 Bureau of Competition invitation to input; F.T.C. vs. Intel; Docket 9288.
Lettered to work report, March 21, 2000; Office of California State Attorney General.

Assessment and models of technical business system - competitive strategy, system's framework, operational clockworks defined through field, primary and secondary research, as seen through the lenses of ten academic disciplines: the law, economics, industrial management best practice, cybernetics, general system's theory, value theory, system psychology, network dynamics, analysis of responsible science in technocracy 1926 – 2002, communication's science.

Partial Primary Research:

Economic analysis across 21 consecutive Intel microprocessor production short runs.
Assessment of Intel P5, P6 production; wave front analysis, surplus reverberation & concentration patterns.
Intel Pentium (P5) economic analysis; 1993 – 2002.
Intel Pentium (P6) economic analysis; 1996 – 2002.
Intel Pentium 4 economic analysis; 2001 – 2004.
x86 microprocessor and graphics processing unit design share research 1990 - 2008.
Assessment of Intel intra-platform horizontal component/matrices consolidation; 1993 – 2009.
Assessment of Editor Choice Awards effecting consolidation of Intel Inside dealer combination.
Assessment of Intel Inside page space allocation as weight of rebated fee pools.
Identification of Intel intra platform microprocessor broker dealers by Intel Inside space allocation.
Assessment of industrial de-structuring inside and outside the rungs of periodic and point attractors.
Complete System's Structure Map; industry taper, channel attractors, value ties, mkt mechanics over structure.
Legal case studies and economic overlays over Intel system's structure and supply chain map; 1993-2000.

Filters for moving Intel case to hearing stage; Easterbrook, Calvani, monopoly share, 9th Circuit filter considering Intel in input and output markets, MCI test, no economic sense & profit sacrifice test, Areeda-Turner below cost price test, predator price test, elasticity analysis, efficient components price standard, general universal test.

Including 1,000,000 words of written analysis through 128 months of reporting to the U.S. Senate & National Association of Attorney Generals.

Partial syllabus of secondary research sources:

Allen, Gary

None dare call it conspiracy

Ashton, T.S.

The Industrial Revolution

Ayers, Clarence E.
The Industrial Way of Life

Baron, Hank
Crisis in the Early Italian Renaissance

Bagdikian, Ben
Media Monopoly

Baumgartel, Howard
The Concept of Role

Bavelas, Alex
Group Dynamics and Inter-group Relations

Beene, Kenneth D.
An Approach to Problems of Inter-religious Conflict
Case Methods in the Training of Administrators
Deliberate Changing as the Facilitation of Growth
Democratic Ethics and Human Engineering
Operational Research

Beer, Stafford
Decision and Control

Bennis, Warren G.
A Theory of Group Development
A Typology of Change Process
Group Observation
Interpersonal Communication
Leadership Theory and Administrative Behavior

Blake, Robert R.
Psychology and the Crisis of Statesmanship

Boulding, Kenneth E.
Beyond Economics

Brandenburger, Adam M.
Co-opetition

Bradshaw, Leland P.
The Teaching-Learning Transaction

Brealy, Richard
Corporate Finance

Breshnahan, Timothy
Competition in the New Computing Industry

Brooks, Harvey

Technology Assessment in Retrospect

Bronowski, J.

Technology and Culture in Evolution

Brynnner, Gary

Worker Alienation

Buckminster, R. Fuller

Operating Manual for Spaceship Earth

Burke, John G.

Bursting Boilers and the Federal Power

Burt, Dobler, Starling

World Class Supply Management

Campbell, Robert

Fisherman's Guide; systems approach to creativity in organization

Cartwright, Dorwin

Achieving Change in People

Group Dynamics and the Individual

Power; a Neglected Variable in Social Psychology

Chin, Robert

Human Relations: A "New" Discipline or an Integrative Force?

Problems and Prospects of Applied Research

The Utility of Systems Models and Developmental Models of Practitioners

Cipolla, Carlo, M.

Clocks and Culture

Clark, Wilson

Intermediate Technology

Commoner, Barry

Are We Really in Control

Counts, George

The Impact of Technological Change

Covey, Stephen R.

Seven Habits of Highly Effective People

Cringeley, Robert J.

Accidental Empires

D'Aveni, Richard A.

Hyper-Competition

Dahrendorf, Ralf

Toward a Theory of Social Conflict

Daniels, George H.

Technological Change and Social Change

Davidow, William

Marketing High Technology

The Virtual Corporation

Davis, Kingsley

The Migrations of Human Populations

de Solla Price, Derek J.

Little Science, Big Science

Dixit, Avinash K.

Thinking Strategically

Douhet, Giulio

The Command of the Air

Drucker, Peter F.

Applied Science and Technology

Management

The First Technological Revolution and Its Lessons

The Futility and Dangers of Technology Assessment

The New Society

Du Bois, Cora

The Public Health Worker as an Agent of Socio-cultural Change

Dubos, Rene

The New Environmental Attitude

Durant, William and Ariel

The Age of Louis XIV

The Age of Reason Begins

The Renaissance

Ellul, Jacques

The Technological Order

Einstein, Albert

Letter to President Roosevelt

Engles, Friedrich

Freedom through Socialism

Fairbain, William

The Engineering Profession

The Invention of the Riveting Machine

Ferguson, Charles H.

Computer Wars

Ferguson, Eugene S.

Nonverbal Thought in Technology

Ferkiss, Victor C.

Bureaucracy

Fine, Charles

Clockspeed

Florman, Samuel

In Praise of Technology

Foster, Richard

Innovation

Frank, Lawrence K.

Fragmentation in the Helping Professions

Frank, Thomas

One Market Under God

Gates, Bill

The Road Ahead

Galbraith, John

The New Industrial State

The Economics of Innocent Fraud

Geidon, Siergfried

Engineering the Household

Geiger, George

Values and Social Science

Geisst, Charles

Monopolies in America

General Advisory Committee to the Atomic Energy Commission

Report on the "Super"

Getzels, Jacob W.

Administration as a Social Process

Gimpel, Jean

Environmental Pollution in the Middle Ages

Glacken, Clarence J.

Nature and Culture in Western Thought

Gleck, James

Chaos, making a new science

Glidewell, John C.

The Entry Problem in Consulting

Goleman, Daniel

Working with Emotional Intelligence

Gracian, Baltasar

The Art of Worldly Wisdom

Greenwood, Ernest

The Practice of Science and the Science of Practice

Greider, William

Who Will Tell the People, the Betrayal of American Democracy

Gouldner, Alvin W.

Engineering and Clinical Approaches to Consulting

Organizational Analysis

Theoretical Requirements of the Applied Social Sciences

Gruen, William

The Moral Dimension of Science

Grove, Andrew S.

High Output Management

Only the Paranoid Survive

Guest, Robert H.

Scientific Management and Assembly Line

Gunderson, Robert Gray

Group Dynamics, Hope or Hoax?

Hammer, Michael

Reengineering Revolution

Heilbroner, Robert L.

Do Machines Make History

Henderson, Carter

The Frugality Problem

Henderson, Hazel
Paradigms in Progress, Life Beyond Economics

Hibbard, Walter R.
Mineral Resources; challenge or threat?

Horwitz, Murray
The Conceptual Status of Group Dynamics

Hostetler, John A.
Amish Society

Jaques, Elliott
Technocracy or Collaboration?

Jenkins, David H.
Force Field Analysis Applied to a School Situation
Group Self-evaluation

Jensen, Gale
A Model for Analyzing Small Group Properties Pertinent to Planned Change

Jensen, Neal F.
The Food-People Problem

Jewkes, John
The Sources of Invention

Jolly, Vijay K.
Commercializing New Technologies

Kaplan, Jerry
Start Up

Kawasaki, Guy
Selling the Dream

Kelman, Herbert C.
Process of Opinion Change

Keniston, Kenneth
Technology and Human Nature

Kelman, Herbert C.
Group Dynamics, Neither Hope or Hoax

Kestin, Hesh
21st Century Management

Kuhn, Thomas S.
The Structure of Scientific Revolutions

Jackson, Tim
Inside Intel

Jager, Rama Dev
In the Company of Giants; conversations with the visionaries of the digital world

Lakoff, Sanford A.
Knowledge, Power and Social Purpose

Laszlo, Ervin
The Systems View of the World

Lao-tzu
Tao Te Ching

Leary, Timothy
The Theory and Measurement Methodology of Interpersonal Communication

Lerner, Max
The Discovery of the "Irrational": Personal and Collective

Levit, Grace
Learning through Role Playing

Levitt, Theodore
Marketing Imagination

Levinger, George
Kurt Lewin's Approach to Conflict and Its Resolution

Levison, Conrad Jay
Guerrilla Marketing Attack
Guerrilla Marketing

Lewin, Kurt
Principles of re-education
Quasi-Stationary Social Equilibria and the Problem of Permanent Change

Lilenthral, David E.
Democracy at the Grass Roots

Lippitt, Gordon L.
What Do We Know About Leadership?

Lippitt, Ronald
Dimensions of the Consultant's Job
Value-Judgement Problems of the Social Scientist in Action Research

Loomis, Charles P.
Tentative Types of Directed Social Change Involving System Linkage

Lynch, Dudley
Strategy of the Dolphin

Machiavelli, Nicole
The Prince

Mann, Floyd C.
Studying and Creating Change

Manniheim, Karl
Freedom Under Planning
From Trial and Error to Planning
Roots of the Crisis of Evaluation

Marlowe, Donald E.
Public Interest, First Priority in Engineering Design?

Marrow, Alfred J.
Changing a Stereotype in Industry

Martin, James
The Great Transition

Mathis, Robert
Human Resources Management

McChesney, Robert W.
Rich Media, Poor Democracy

McGregor, Douglas M.
The Human Side of Enterprise

McKenna, Regis
Relationship Marketing

McLuhan, Marshall
Automation

Meier, Hugo A.
Technology and Democracy, 1800 - 1860

Merton, Robert K.
Social Scientists and Research Policy

Miles, Mathews
The Training Group

Moe, Edward O.
The Nature of Community

Morison, Elting E.

A Case Study of Innovation

Moore, Barrington

Sociological Theory and Contemporary Politics

Moore, Geoffrey A.

Crossing the Chasm

Inside the Tornado

Moore, James F.

Death of Competition

Morgan, Arthur E.

The Garrison Dam Disaster

Morgan, Thomas, D.

Modern Antitrust Law and its Origins

Morici, Peter

Antitrust in the Global Trading System; reconciling U.S, Japanese and EU Approaches

Mumford, Lewis

The All Seeing Eye

The Technique of Total Control

Murphy, Arthur E.

The Efficacy of Reason

Nadar, Ralph

Unsafe at Any Speed

National Training Laboratories

Some Dimensions of Group Growth

Nelkin, Dorothy

The Technological Imperative versus Public Interest

Nordlinger, Eric

On the Autonomy of Democratic State

Ogburn, William F.

Technology as Environment

Ostrander, Shelia

Psychic Discoveries behind the Iron Curtain

Pages, Max

The Socio-therapy of the Enterprise

Parson, Talcott

The Problem of the Theory of Change

Pascale, Richard T.

The Art of Japanese Management

Peter, Paul J.

Marketing Management

Pigors, Paul and Faith

The Incident Process

Porter, Michael

Competitive Advantage

Competitive Strategy

On Competition

Pursell, Carroll M.

The Government and Industrial Technology

Ramo, Simon

The Systems Approach

Ravitz, Jerome R.

Social Problems of Industrialized Science

Riesman, David

The Researcher and His Audiences: Introduction to Crestwood Heights

Rogers, Carl

A Process Conception of Psychotherapy

Rogers, T.J.

No Excuses Management

Rosenberg, Nathan

Economic Growth, Technology, and Society

Technology and Resource Endowment

Roszak, Throdore

The Citadel of Expertise

Sakharov, Andrei D.

Nuclear Weapons Development

Salvatore, Dominick

Managerial Economics in a Global Economy

Sanders, Irwin T.

Approaches to Social Change

Sanders, W.J

Is the Semiconductor Industry Mature?

Samuelson, P

Economics

Schein, Edgar H.

Interpersonal Communication, Group Solidarity and Social Influence

Schmookler, Jacob

Economic Sources of Inventive Activity

Schutz, William C.

Interpersonal Underworld

Schumpeter, Joseph

Capitalism, Socialism and Democracy

Schwartz Cowan, Ruth

The "Industrial Revolution" in the Home

Schwartz, Morris S.

Intervention and Change on a Mental Hospital Ward

Seashore, Charles

The Consultant-Trainer Role

Semrad, Elvin V.

The Use of Group Processes in Teaching Group Dynamics

Senge, Peter M.

The Fifth Discipline

Shalin, Leonard

Art & Physics; parallel visions in space, time and light

Sheppard, Herbert A.

The T-Group as Training on In Observant Participation

Shrode, William

Organization and Management

Siler, Todd

Think like a Genius

Simon, Herbert A.

What Computers Mean for Man and Society

Slater, Phillip E.

Displacement in Groups

Spiegel, John P.

The Resolution of Role Conflict within the Family

Stanley, William O.

The Collapse of Automatic Adjustment

Stein, Maurice

The Eclipse of Community

Strachey, John

The Nature of Capitalist Crisis

Strauss, Anslem L.

Transformations of Identity

Sullivan, Harry S.

Multi-disciplined Coordination of Interpersonal Data

Tabb, William

Economic Governance in the Age of Globalization

Terry, Earle Melvin

Advanced Laboratory Practice in Electricity and Magnetism

Thelen, Herbert

The Growth of a Group

Thompson, Arthur, A.

Crafting & Executing Strategy

Thompson, James D.

Organizational Management of Conflict

Treacy, Michael

The Discipline of Market Leaders

Tzu, Sun

Art of War

Varian, Hal R.

Intermediate Microeconomics

Veblen, Thorstein

The Role of the Engineers

Wager, J. Alan

Growth versus the Quality of Life

Wallace, James C.

Freedom and Direction

Ward, Barbara

The Rich Nations and the Poor Nations

Watzlawick, Paul

The Invented Reality

Weiner, Charles

How the Transistor Emerged

Winner, Langdon

Technology as Legislation

Wik, Reynold M.

The Government and Agricultural Technology

White, Lynn

Dynamo and Virgin Reconsidered

The Act of Invention

The Taming of Mammon - Frontiers in the Knowledge of the Study of Man

Wright, Quincy

Technology and Warfare

Yergin, Daniel

Commanding Heights

York, Herbert F.

Strategic Reconnaissance

Zaheer, S. Husain

India's Need for Advanced Sciences and Technology

Zander, Alvin

Resistance to Change – Its Analysis and Prevention

July 4, 2010; revision 5.1 with exhibit refinements, more detail on RICO proofs and monopoly pointers.

To: Chairwoman Schapiro & Commissioners,
Securities and Exchange Commission
United States Senate
Congressional Committees
State Attorney Generals
United States Attorneys
Chairman Leibowitz & Commissioners, FTC
Director Robert Mueller, FBI
Honorable Eric Holder, DOJ
Vice President Joseph Biden

Fm: Mike Bruzzone
Camp Marketing Consultancy
6025 McBryde Avenue
Richmond, CA 94805

Re: Intel Corporation Competition Case Update
2nd Notice of Intel Network SEC Violations; Case Reference HO-1248999

- **Intel consumer & industrial monopoly recoverable grows to \$88 billion**
- \$26.442 to \$42 billion subset is consumer fraud legitimately due consumers.
- \$43.827 billion industrial monopolization due industry & harmed shareholders.
- Quanda Model RICO proof; Intel Insider stock trading & NASDAQ market rig.
- Lettered Relator Seeks Attorney; FCA, 31 USC 3279, recovery of monopoly & fraudulent cost imposed on Federal Government's Intel based PC purchases.

Honorable Commissioners, Senators, Congressmen, State Attorney Generals, U.S. Attorneys, U.S. Attorney General Eric Holder, Vice President Joseph Biden:

Pursuant to Camp Marketing Consultancy ongoing Intel Network case assessment:
Consumer recoverable Intel Inside transport charge, monopoly price premium, industry monopolization on Intel economic and financial analysis grows total intent to monopolize recovery, by 12%, to \$88 billion.

Monopoly recovery estimate is based on two investigative tracks. First, Intel monopoly system metric applied to Intel sales revenues on manufacturing estimates of Intel microprocessor quantities, per quarter, by Micro Design Resource¹. Second, sorting out Intel monopoly system expenses *misrepresented* as legitimate costs within Intel financials.

Data analysis parallels FTC Docket 9341 time frame and covers day one on January 1, 1999 through mid 2004 on production; extending to 2006 on Intel financials. For the purpose of optimizing in period recovery estimate, data from both investigative tracks are

¹ Linely Gwennap & Kevin Krewell, Intel Microprocessor Forecast 2H 2000, Micro Design Resource, Cahners Publishing Company

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

relied. Findings include proofs and pointers of RICO, enterprise network corruption and Sherman Act Section 1 and 2 per se condemnations of law. Findings are submitted to FTC, U.S. DOJ Antitrust, DOJ Criminal and Consumer Fraud, New York State DOJ for follow on discovery from Intel Network.

Revision 5.1 of this briefing updates State Attorney Generals on particulars of the case matters. Is meant by this case steward; the Relator original source, too solicit counsel for False Claims Act recovery of fraudulent and monopoly costs imposed on Federal government's Intel microprocessor based computer purchases. This analyst believes FCA is now proven on weight of Intel false statements to conceal. monopoly and fraudulent costs imposed on Federal government and related GSA computer procurement claims.

Further this analyst encourages dialogue between State Attorney Generals and U.S. Attorneys for establishing a coalition to recover consumer harms, in each State, which can be calculated by the domestic 'Standard Metropolitan Statistical Area' subset of what is a worldwide consumer recovery value. Make sure your State and Federal District get its actual share of the consumer recovery in relation to not calculating this amount subject to worldwide distribution. Recover the transport charge 'kick back' value stolen by Intel Network, from general consumers within your State and Federal buyers within your District, and not a penny less.

To estimate the recovery in your own State House and Federal Building: 1) go to the IT Department; 2) find out how many Intel based PCs have been purchased and deployed their annually since May 1993; 3) multiply that amount by \$25.50 each to determine your combined Federal Building and State House recovery values.

Background

Beginning Docket 9288, May 1998, various reports and analysis are submitted by this analyst to FTC now operating in voluntary civic service capacity under Department of Labor Code 3363.5. Today a decade of analysis delivers tens of Docket 9341 discovery proofs or pointers to proofs. Many of which this audience are familiar from prior reports by this analyst submitted to U.S. Senate, Congress, State AGs and U.S. Attorneys.

Under Docket 9341 discovery rules, work from this analyst is passed by FTC Bureau of Competition to Intel for legal rebuttal.

Three Components of Monopoly Recovery

Monopoly recovery is a worldwide financial value having three main components:

- 1) Consumer recovery is based on the system costs of Intel Inside tied charge back for *routing* Intel microprocessors across state lines and inter nation boundaries inside a computer chassis. See prior analyst submissions for specific details covering the illegal aspects of this market rigging rebate fee scheme.

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

- 2) Consumer recovery from monopoly price premium associated with some Intel microprocessor and PC product introductions.
- 3) Industrial harms which include predatory product dumping, Intel selling at a price less than average total cost, measures of variable down to average fixed cost. Finally, estimation of the marginal cost for Intel to produce a single x86 microprocessor in relation to price sought with variable cost cross check. Where price is within or lower than average fixed cost, variable or marginal cost, revenues from those quantities are recorded as an industrial monopolization recovery value for FTC discovery.

Consumer Recovery Subset 1; kick back, in violation of Sherman Act Section 1, Section 2, Clayton Act Section 2, 3, 4, 5, 13e, 13c, 13d, Title 48, 1986 anti kickback act

Of the \$26.442 billion subset of consumer recovery documented from Intel production estimates (where \$42 billion total set is documented by contract), \$22.657 billion or 85% is associated with Intel Inside tied charge back sum misrepresented in Intel and PC Dealer financials. That sum is split between Intel and PC Companies 50:50 for the purpose of this analysis based on the Intel Inside monopoly system metric. Yet Intel's portion is known to increase, and PC Companies decrease, over the 15 year duration of this Intel Insider operation.

Intel financials associate Intel Inside as a marketing cost credited to PC Company microprocessor sales. When this commissionable sales value is actually an accrued Dealer rebate passed through Intel as a sales reward for Media Sales Agents taken as their fee, to sustain the supply chain's product distribution ties between Intel, PC Dealers and Media Agent's sales channels. Sales Channels include PC Week, PC Magazine, Computer Shopper, Family Computing, PC World, Windows Magazine, other PC and some general media.

Rebate values are sustained from back in time with forward time purchase agreements. Production short run to short run, Dealer's microprocessor purchases are unnaturally weighted to benefit them guiding Media Agents sales preferences. Intel 1st tier Dealers purchase microprocessors in excess of end demand solely to strip margin values, including consumer transport charge, prior to reselling overage into secondary broker channels. PC Dealers who are Intel's 1st tier brokers monopolize majority of Intel margin values, including tied charge back, sustaining their Media Sales Agent artificial attractor and the cross industry distribution tie in total.

This relationship is a financially driven one, planned and implemented for Media Sales Agents to register, meter, report level's of Intel microprocessor flows through PC dealer channels back to Intel. That is the nature of the charge back; for media registering and reporting back channel sales flows through PC Companies to Intel. Over time the system evolved into one which accelerated Dealer product flows artificially from one Intel product generation to the next, on the weight of Intel kickback placements meant to discharge certain Dealer inventory, to end market buyers, on an Intel time schedule.

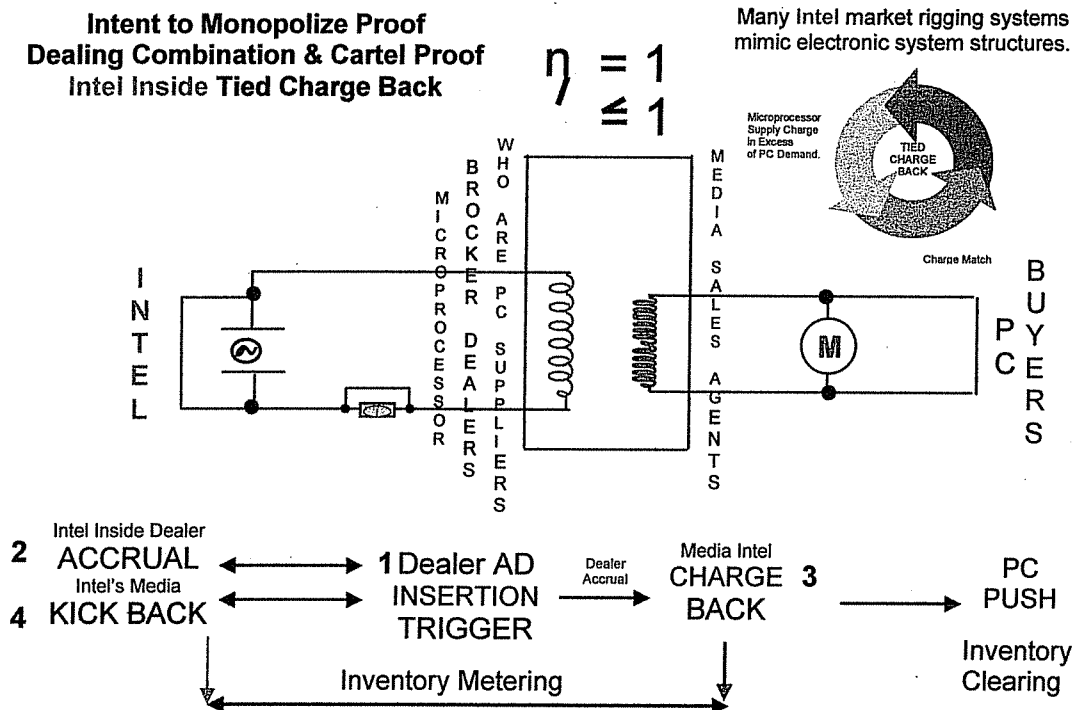
SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

One Combined Cartel Proof

Additionally, for Dell and Gateway certainly, Intel PC Dealers earn a cartel margin gain from their Media Sales Agents as a result of their Intel Inside kick back. Cartel margin gain on this routing fee is secured when any PC Dealer's annual advertising pages exceed Intel's annual advertising pages.

Under Intel Inside contract guide all PC Dealers receive the Intel Corporation advertising page frequency discount rate from Media Sales Agents. Note the competitive limiter here for non Intel Dealers lacking this form of Intel Network scale economy. For PC Dealers who advertise at a greater annual page frequency rate then Intel Corporation annual pages, Cartel margin gain is secured on the difference in frequency discounts applied to Intel pages verse any Dealer's deeper ad discount rate from Media Sales Agents.

CAMP MARKETING CONSULTANCY



Mike Bruzzone, Camp Marketing Consultancy, 415/250-4652

FTC 1999 & 12/23/09

Media's ad frequency discounts, called network buys, are based on any one Dealer's annual volume page purchase agreement with Media Sales Agents. When anyone Intel Dealer's annual pages of advertisement exceed Intel annual pages, added margin value is earned on every Intel kick back for every future ad insertion by these foremost cartel members. System diagram of cross enterprise industry bottleneck monopoly is depicted above.

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

PC Company matching half of the media sales tie triggers the tied charge back match from Intel's Dealer Accruals to Media Sales Agents. That value tie is misrepresented in PC Dealer financials as an advertising cost applied to every computer sale. Taken together computer end buyers pay both halves of this hidden transport charge in their computer's end sales price. 100% of the consumer charge is taken by Media Sales Agents for directing Intel PC consumer search. Making consumer search focused, quick and easy.

This hidden consumer transport tax for Intel microprocessor product routing, taken by Intel and PC Companies from consumers, and paid to Media Sales Agents, is meant as a sales commission to pay for Media's cost of Intel product sales; communications medium, display space, news coverage, Intel and Dealer content development including Dealer's PC product reviews. For ZD, certainly, this payment was also a form of extorted tribute.

Because the tie is based on a variable commission reward on Intel microprocessor price, Media Sales Agents tend to push computers to consumers containing Intel's highest priced; latest and greatest microprocessors. Or will focus on moving large lots of slow moving Intel microprocessor based computers that have been clogging up the Intel supply system; those capable of delivering a large total reward value to Media, when routed together until discharged from Intel PC Dealer inventories.

The existence of this Intel tied charge back system is the accounting compliment to Dell Corporation misrepresenting Intel kickbacks; rebates and loyalty rewards, as sales revenue now under investigation by the SEC. Intel's half of the Dell accounting fraud is documented as cooperative advertising accounts misrepresented within Intel's own financials since 1993. There is currently a rather extensive accounting fraud being hidden within Intel, by Intel and Intel Network. And I would presume under current investigation by the U.S. Department of Justice and the Securities Exchange Commission? Intel market rig was reported by this analyst to SEC in 2007; HO 1248999.

Intel tied charge back misrepresented in financials as a cooperative advertising expense documented contractually with Dealers x 2 for total set consumer calculation.

Reported in \$ Billions

1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004
.325	.459	.654	.974	1.2	1.3	1.7	2.0	1.6	1.7	1.8	2.1

2005 2006

2.6	2.3	Total Docket 9341 Period of Review = \$15,800,000,000
		Total through Program Operation = \$20,712,000,000

Source: Intel Annual Report to Stockholders

Note: x2 by contract agreement between Intel & Dealers = \$31.6 billion to \$41.424 billion

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

Consumer Recovery Subset 2; monopoly price premiums -

The remaining 15% consumer subset recovery of \$3.785 billion is associated with personal computer end buyers paying a monopoly price premium on some Intel PC purchases. That percent of product, one Intel product generation to the next, where consumers paid a monopoly price for the microprocessor above the monopoly competitive or equilibrium price. Which means computer's containing the latest and greatest Intel microprocessors. Computer's featuring the highest speed, or most microprocessor cores, or the highest combination of performance and power savings in a notebook model. Microprocessors typically offered in the high performance computer brand models within Intel Dealer PC product lines. But can also be associated with computers containing Intel value priced microprocessors.

\$3.785 billion dollar sum is conservative and advantages Intel on analysis which uses average price on quantities. Using preferred average weighted price across product types, the monopoly price premium can grow. Infra marginal product, that which Intel makes least of and charges most for, offers highest end buyer recovery potential for these small short lots of monopoly priced microprocessors. Product associated with Intel new microprocessor and new PC product introductions displaying patterns of 1st degree price discrimination, exclusive dealing, the raising of microprocessor price following predatory price moves designed to monopolize markets and to stop channel sales flows of competitor's products. Competitors include x86 microprocessor horizontal competitors including AMD, chip set & graphic vertical rivals and compliments, like VIA and nVidia, other x86 and inter platform computers and some PC platform replacements.

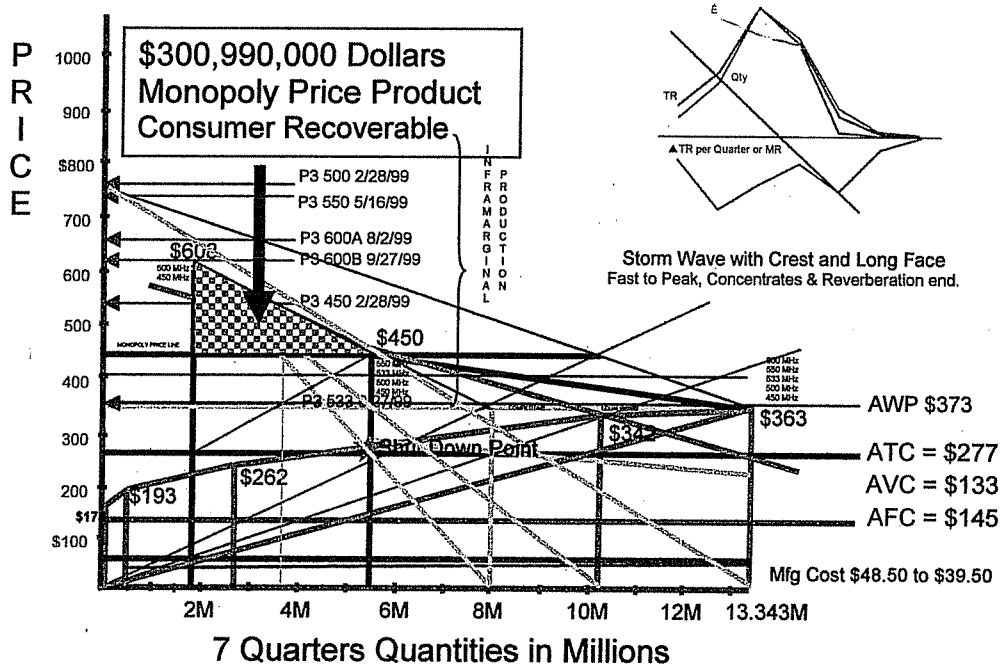
One of the consumer monopoly price premium examples -

Below find partial economic analysis from the Intel planned economy; Pentium 3 risk production code name Katmai, 0.25 micron lithography, 450 to 600 MHz clock speeds.

Katmai average weighted price is calculated on Intel 1,000 piece price and Micro Design Resource quantities on speed splits. Micro Design Resource quantity estimates are long time and widely accepted by technology, finance and media industries who are Intel customers, stake holders and stockholders. MDR estimates are in fact the intra industry regulator itself, that was made into an inter industry sales game by Intel Network.

For Katmai, economic analysis below reveals \$300,990,000 in consumer loss from paying a monopoly price greater than \$450 for first quarter's production of 1,905,000 units. Monopoly competitive equilibrium price is \$363 which suggests a monopoly deadweight cost of up to \$400,106,000 on second quarter production of 5,438,000 units. Run down quantities are less than \$363, with end of run quantities priced \$262 down to \$178; are between average total and average fixed costs. No below fixed cost production is recorded for this specific desktop microprocessor short run. Although quantity and revenue difference in analyst and MDR Intel estimated shut down points are raised.

Camp Marketing Consultancy



Mike Bruzzone, Camp Marketing Consultancy

FTC Revised Check 5/31/2010

Foremost, consumer monopoly price premium of \$300,900,000 and \$764,517,480 in Intel Inside charge back values are recorded. Charge back values represent matching halves of the Intel and PC Dealer tie passed through to Media Sales Agents. In this estimate at 3% each on Intel total production revenue's of \$12,741,958,000. The specific percentage pass through value is defined contractually within the Intel Inside contract agreement between Intel, Dealers and Media Sales Agents. An evolutionary series of guidelines concerning tied charge back I've encouraged FTC to discovery for a decade now.

Katmai analysis is not a proof, but a pointer to two consumer losses totaling \$1,065,417,480 for FTC Docket 9341 discovery. Findings from this analyst are passed on by FTC to Intel, for Intel rebuttal. So what has FTC learned from Intel's document production in rebuttal?

Consumer Recovery Time frame

\$3.785 billion consumer monopoly price recovery is calculated on Intel product runs occurring between January 1, 1999 and July 2004. The analysis is undergoing a third evolution of refinement.

For FTC Docket 9341 review period, additionally, six years of Intel production estimates are currently missing from this specific analysis. Both the existing and remaining

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

production and price data require FTC and or DOJ discovery from Intel for validation as a monopoly proof. RICO; specifically cross enterprise, cross profession network driven markets rigging is proven regardless. Proven on structure and directly witnessed conduct.

Industrial Subset 3

Industrial subset is estimated principally on Micro Design Resource estimates of Intel product short runs; estimated quarterly quantities at Intel stated price in period, cross referred against Intel average total cost, average fixed cost, variable cost determined on Intel financials. Finally, the marginal cost estimate to produce a single microprocessor from economic analysis cross checked with variable cost from Intel financials.

Classic economics analysis is used because classic era rules appear to offer the foundation of Intel's economic technology until Pentium M 2005 product segmentation phase. In decomposing Intel systems structure academic theory of the 1930s through 1970s is insightful. This key for decomposing Intel systems theory appears established using similar texts that Messrs. Moore, Grove, Barrett and other executives might have been taught, as the syllabus of FTC primary and secondary case research documents². Although practiced on a slightly more sophisticated level then solely running the neighborhood breakfast shop or determining the customer demand for egg dishes. Intel system mechanics appear to be designed by engineers and system theorists.

Economic Calculations

Five primary calculations are used in Intel economic analysis decomposing a cost based quantitative mathematical model relied on by inside traders for playing the Intel stock price. Price multiplied by quantities to determine quarterly revenue and change in revenue. Change in price and quantities to determine price elasticity. For a cost based model, change in revenue (suspect as change in total cost), divided by change in total quantity for estimating marginal cost average. The result can correlate with variable cost cross check from financials. Change in revenue (suspect as cost) divided by change in quantity suspect at Marginal Revenue approximation. Actually an indicator of Intel product stocks acceleration, the calculation can be compared against the cross check $MR = P \cdot (1 - 1/Elasticity)$.

One of the At and < Fixed Cost Examples -

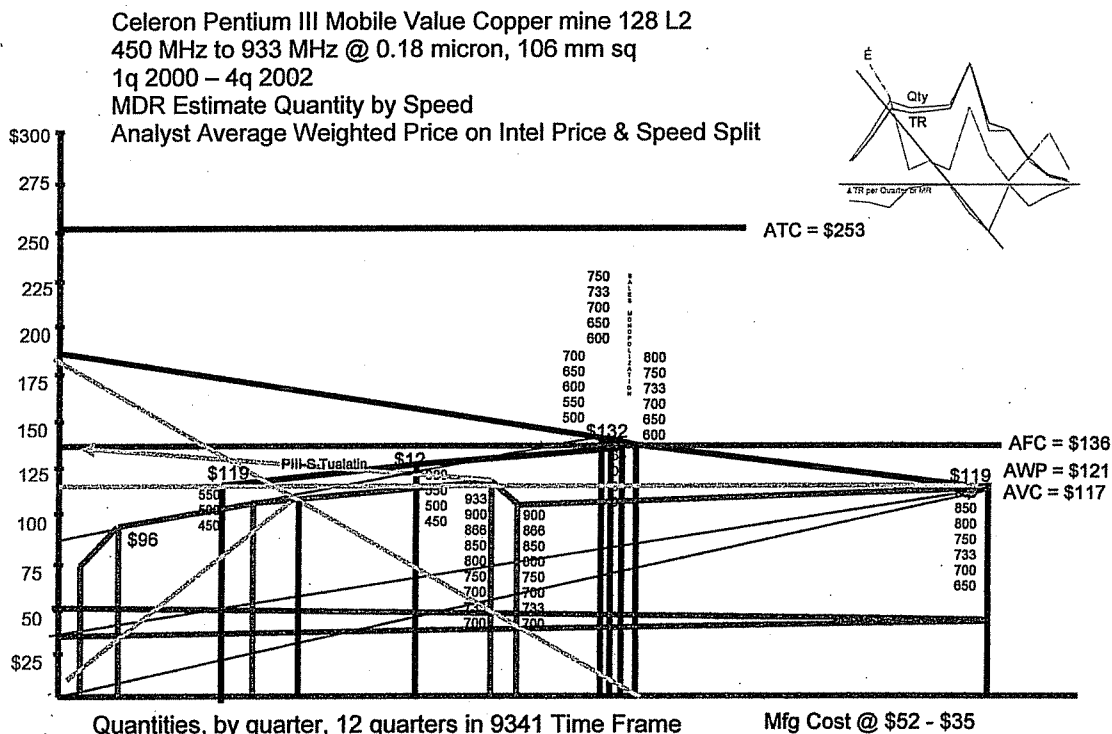
Below find example of Pentium 3 Celeron Mobile Value priced at and below fixed cost. On revenue of \$3,132,065,000 estimates industrial monopolization of \$2,780,853,050 where price is less than Average Fixed Cost of \$136; and \$351,211,950 industrial monopolization where price is at or less than Average Variable Cost of \$117 and suspect below Marginal

² Bruzzone, Assessment & Models of Technical Business Systems seen through Field, Primary & Secondary Research

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

Cost at production end of run. Intel Inside tied charge back consumer recovery value associated with this Intel mobile short run is \$187,923,900.

Camp Marketing Consultancy



Mike Bruzzzone, Camp Marketing Consultancy

Revised Check 6/20/2010

Calculated primarily on average product price, industrial monopolization is currently estimated at \$43.827 billion for the period January 1, 1999 through June 2004. That is one half of the time period under review in Docket 9341. Industrial recovery values principally include Intel product price, near and below average fixed cost, with a variable cost check. Approximately 28%, or \$9.781 billion of the total sum, has been estimated on classic economics, economic calculations and financials too be priced less then the marginal cost for Intel to produce that single unit of production. With evolution of the economic calculation to average weighted price on product speed grade splits, industrial monopoly recoverable is expected to be slightly less then stated here. Coincidentally this average price, verse average weighted price trade off, may cause some consumer recovery values to rise.

Accounting vs. Economics

This analyst takes the accounting view that Intel marginal cost to produce one unit is the Average Total Cost of that unit. An industrial economist might argue that marginal cost is no less then Average Fixed Cost per unit. Some have proposed marginal cost as the

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

Manufacturing cost for one unit which this analyst rejects; although economic analysis suggests. Where Intel price is at or less than marginal cost defined here as fixed cost, or variable cost, that portion of the production run is subject to Areeda Turner review.

However, Intel intent to monopolize appears proved on 9th Circuit Court filter regardless. Showing monopolization; economically & structurally, occurring across consecutive Intel microprocessor production short runs. This analyst has assessed 23 production short runs.

Quantitative Model confirms RICO proof of Intel Insider stock trading.

In analyzing the economics of Intel production short runs for FTC, this analyst has been decomposing the components of an Intel insider stock trading tool. Recomposed components of the tool yield a rudimentary Intel economics simulation.

The tool requires one quasi public, and one public signal, that when filtered together enable the inside trader to estimate changes in Intel's revenue and margin out into the future. And can specifically be used to estimate Intel profit margin ahead into future time; for playing the stock price, INTC.

Input to perform the necessary economics calculations to play the stock are supplied by the quasi public signal from Micro Design Resource; which are Intel quarterly microprocessor quantities estimated two years into future time. The public signal is Intel change in price notices which are widely publicized in business, finance and trade news sources; including New York Times, PC Week, CNET, Register and other hard copy and web publications. Who knew they were more than simply Intel price announcements?

Intel change in price notices have traditionally been released to the public audience, trade and Intel supply channels 90 days ahead of the actual price changes taking affect. This lag effect gives the Intel Inside Stock trader a 90 day window for recalculating change in Intel revenues and profit margins for playing the stock. And can be accomplished simply with two inputs; price change calculated against Micro Design Resource quantities estimated into future time.

Typically the inside trader could project Intel revenue and margin value 3 months ahead on Intel advance notice of changes in microprocessor prices. Periodically, public notice of Intel price change has been shorter than 3 months. And multiple price changes have occurred within some Intel quarterly production periods under analysis.

Mr. Gwennap who is principle analyst and proprietor of Micro Design Resource (MDR), raised concerns on his perceived misuse of MDR Intel production estimates, by the investment banking community, to this analyst in 2001. Mr. Gwennap provided the Intel production estimates on which this analyst has decomposed the Quanda against Intel 1,000 piece stated price. Resulting in a tool for retrospectively playing Intel Corporation stock price and for calculating monopoly costs and consumer harms based on change in quarterly revenue and margin potential.

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

Several questions exist concerning future time Micro Design Resource estimate of Intel microprocessor quantities on wafer dice estimates. First are they purely an MDR estimate of Intel production capability? Second, might estimates be Intel's actual production forecast passed to MDR for industry publication? Third, if purely MDR estimates were quantities confirmed by Intel end of quarter, as quarterly PC shipments are confirmed by PC Companies to PC industry analysts? Fourth, how accurate are the MDR estimates? Fifth, and the wild card, are estimates fictitious designed by late 1990's MDR owner, the Bill Ziff Davis Publishing Company, purely to lead and pump the stock price?

Micro Design Resource estimates of Intel production are widely accepted as accurate. Given the best price projection and economic tools Intel Inside traders can calculate change in Intel revenue and margin, by microprocessor product line, and from the outcome play the stock on quarterly financial outcomes up to two years into the future. I have no doubt all major trading houses knew of the Quanda, including Robertson Stephens, and were running this software simulation on Intel Xeon servers performing similar exchange calculations and financial simulations.

Noteworthy the Quanda is also how Media Sales Agents calculated their future revenue flows from Intel Network. Retrospectively, the Quanda enables the Media Sales Agent to calculate their Intel Inside charge back flows from Intel Combine up to two years into the future. On this cash flow projection media based their Intel product production plan; the amount of Intel dedicated page space, Dealer PC product reviews and sales coverage.

The Quanda can also be used to estimate advance PC company revenues and margins; specifically Intel Dealers; Dell, Gateway, others by extending the simulations inputs to two additional public signals. Those signals are sales space invested by Ziff Davis, IDG and other publications on PC product coverage and review pages.

Media Sales Agents push computer brand models known to carry the highest value Intel Inside charge backs. Media focuses on skimming these Intel and Dealer values through their focused PC review coverage. Intel product allocation to Dealers can be estimated by the specific weight of PC Company brand models that Media Agents push onto consumers in real time.

Two metrics can be used for determining which Dealer's computer brand models Media Sales Agents are pushing onto consumers for their Intel 'tied charge' kick back. The best metric here shown in PC World analysis, below, is purely the page space allocated to any one Dealer's PC brand model product reviews. With this method there is no subjectivity associated with Editorial Accolade, the sole determinants being Media Sales Agent cost of page space and kick back revenues on this investment in Intel Dealership.

The second metric is more subjective, harder to prove as a stand alone indicator, potentially much more evil from the standpoint of an affront to journalism. That is when the Media Sales Agent begins skewing Editor's Choice and similar Product Awards to

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

Dealer's brand models. This tactic is relied upon for accelerated sales and major capture of the Intel tied charge back. Note that Media Sales Agents compete with one another for total kick back values associated from anyone Intel production short run. For the purpose of this analysis that charge back value is always 3% (times 2; one half representing Intel kick back, the other is Dealer half representing charge back trigger) calculated against Intel total revenues from anyone production short run.

Method 1 on Media Agent Space Dedicated to Dealer Sales

Following exhibit shows 'poker.com' style statistical analysis for publisher computer brand review support revealing Intel dealer channels. That analysis looks upward in the value chain through the monetary exchange lens of media sales agents, through Intel microprocessor broker and computer dealers, directly into Intel.

Statistical Analysis of Intel intra platform product routing by Dealer computer brand model in International Data Group's PC World Top PC Sales Racket follows.

Note: Post rebated fee year 2008 level market high = 233%; market average = 166%.

Intel PC Dealer	<u>3/2005 - 12/2008</u>	<u>1999-2/2005</u>	<u>1987-1998</u>
A	113.00%	265.00%	0.00%
B	170.00%	111.00%	136.00%
C	187.00%	60.30%	0.00%
D	28.00%	0.00%	0.00%
Compaq	65.00%	364.00%	379.00%
F	195.00%	96.50%	53.10%
Dell	504.00%	1163.00%	2071.50%
H	170.00%	91.70%	0.00%
Gateway	178.00%	765.00%	1024.00%
HP	626.00%	412.00%	113.80%
IBM	170.00%	386.00%	257.00%
Lenovo	382.00%	0.00%	0.00%
M	203.00%	345.00%	220.00%
Micron	108.00%	393.00%	918.00%
O	187.00%	292.00%	98.60%
P	0.00%	200.00%	386.00%
Q	113.00%	118.00%	0.00%
Toshiba	195.00%	234.00%	493.00%
S	113.00%	7.20%	0.00%
Others			

Statistical analysis reveals some Intel dealers and publishing agents are cheating their *organic* probabilities. That is by placing more of certain Intel Inside branded PCs for sale given their known high level of commission values waiting media release from dealer

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

rebate fee pools accumulating for Intel Insider charge back. The Media Agent's sales reward is paid for moving computer brand models to consumer from stocks and discharging their effect on the supply system in exchange for the charge back value.

Through this function Media Sales Agent register Intel product movement from Dealer stocks reporting back to Intel for their 'metered' sales reward; the commission.

Method 2 on Media Agent Percentage of Total Editor's Choice Awards

Statistical Analysis of Editor's Choice skew on intra platform product routing by Dealer computer brand model, April 1987 through August 2008, in the Bill Ziff Davis Cartel, PC Magazine, PC Sales Racket:

Descriptive Statistics Relative Frequency of Winning Editors Choice Across 252 Issues Among 63 Total Winners

Mean	0.02941547
Standard Error	0.007338245
Median	0.003968254
Mode	0.003968254
Standard Deviation	0.058245512
Sample Variance	0.00339254
Kurtosis	17.3494465
Skewness	3.840748914
Range	0.349206349
Minimum (1)	0.003968254
Maximum (Dell)	0.353174603
Sum	1.853174603
Unique Editors Choice Winners in 252 Issues	63

**Frequency Editors Choice Wins
252 Issues Among 63 Winners
PC MAGAZINE 1987 - 2008**

Classic Probability		Frequency Win 252 Issues, 63 Winners	
Dell	w/89 = 19%	0.353174603	1200.64%
HP	w/61 = 13%	0.242063492	822.91%
IBM	w/35 = 7%	0.138888889	472.16%
Toshiba	w/28 = 6% (incomplete notebook sample)	0.111111111	377.73%
Velocity	w/23 = 5%	0.091269841	310.28%
Apple	w/22 = 4.7%	0.087301587	296.79%
Gateway	w/21 = 4.5%	0.083333333	283.30%
Falcon	w/18 = 3.8%	0.071428571	242.83%

Please consider PC Dealer Analysis using Method 1; for PC Magazine; PC Company comparison solely on product review space, allocated to 48 companies across 104 issues. Frequency of product review space placement mean average is 0.02083. Time Period is February 2000 through August 2008.

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

Space Allocation over mean average of 0.02083	Weight	Placements	% Total	% AMD Stated	
Dell	3.3846	16,246.08%	352	15.93%	3.13%
HP	3.1442	15,092.16%	327	14.80%	16.21%
Gateway	2.1057	10,107.36%	219	9.91%	5.02%
Sony	1.4807	7,107.36%	154	6.97%	0.00%
Apple	1.4038	6,738.24%	146	6.61%	0.00%
Toshiba	1.3557	6,507.36%	141	6.38%	0.00%
Lenovo/IBM	1.2019	6,461.28%	125	5.65%	4.80%
Fujitsu	0.7403	3,553.44%	77	3.49%	0.00%
Velocity	0.6923	3,323.04%	72	3.26%	27.78%
Falcon	0.6442	3,092.16%	67	3.03%	22.39%
eMachines	0.5192	2,492.16%	54	2.44%	46.30%
Acer	0.4711	2,261.28%	49	2.22%	12.24%
Alienware	0.3653	1,753.44%	38	1.72%	15.79%
Polywell	0.3365	1,615.20%	35	1.58%	42.86%
Asus	0.3269	1,569.12%	34	1.54%	0.00%
Voodoo	0.2403	1,153.44%	25	1.13%	60.00%

Above, comparing skew on Editors Choice to space allocation reveals Intel Dealing Group, tied by the charge back, to PC Magazine Media Sales Agent channel.

Findings from Decomposition of Intel Economics

Decomposing components of the Intel economics simulation has revealed a number of hidden aspects concerning Intel's business, the PC Dealing Combination and Media Cartels who are and have been Intel's primary business partners.

First, Intel's primary business is not the microprocessor or compute platform business. Intel's primary business is selling product routes that PC Companies bid on and Media Sales Agent's determine their future case flows on. Obviously this form of racketeering restrains inter brand computer and PC platform, and x86 microprocessor price competition, and is a per se illegal under the Sherman Act, Clayton Act, Title 48 pursuant to GSA procurement including the 1986 anti kick back Act.

The power of Intel to fix the price of the product which it manufacturers with a tied charge back, which broker dealers and agents scramble to benefit from, and to whom all have been and are actual or potential competitors is a powerful inducement to abandon competition. Active and vigorous competition then tends to be impaired, not from any preference of the end buyer for an Intel microprocessor based computer, but from the preference of Intel broker dealers and agents to accrue the benefits of a tied rebate matched by that broker dealer, and charged back to Intel, for payment to media agents on every *future* computer sale.

This analyst believes on the weight of findings, FTC Docket 9341 First Amended Complaint will add forms of Intel price fixing to government current claims. Precariously,

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

some individuals within FTC might also now being threatened by Intel Network; to bury the case and its anticipated affirmative outcomes. When Intel Network has a history of hooligans sent in to remind competitors how to compete, and for this Docket 9341 case, the post FTC employment and Bar potentials of either competing, or not competing with Intel Network.

Second, the Quanda is relied upon by Intel PC Dealers to determine which Intel microprocessor product routes to bid on given Intel searching for highest price taker. Savvy procurement can use the Quanda to simulate the optimum microprocessor routes to jockey purchases given their revenue, margin potential and Intel retrospective sales rewards including the sales system tying charge back value.

Third, horizontal competitors operating under a Cournot economic assumption rely on the Quanda for determining their Nash equilibrium; which isn't under Intel methods of selling at and less than Average Fixed Cost. Nor does an oligopoly welfare space exist in many Intel microprocessor production short runs.

Fourth, Intel media sales agents including the Bill Ziff Davis Cartel used the model to calculate their revenue and sales commissions from Intel and PC Dealers; retrospectively, up to two years in advance. Media knows values misrepresented in Intel and Dealer financials as Intel Inside marketing expense are 100% recoverable by them; as a sales commission for pushing computers onto consumers for the Intel Inside tied kickback. As they did very successfully for 15 years until the model disintegrated under Intel production constraints and a distribution channel reconfiguration. Approximately 2005/6 Intel Inside tied charge back morphs into the first Dollar discount scheme³. First dollar discount values also need to be calculated.

The \$22.657 billion Intel Insides tied charge back value from January 1, 1999 through program end in 2006/7 remains fully recoverable by FTC. Intel Inside tied charge back is addressed within Docket 9341 claims, discounts & rebates, for whom this analyst is the FTC documented original source.

By FTC record this analyst is also believed original source concerning some Intel benchmark rigging claims addressed in Docket 9341. Where this analyst was previously responsible for designing patches that worked around some rigged benchmark's in efforts with PC User Groups across the country; as a Cyrix, NexGen, AMD and IDT Centaur employee or consultant. This includes Docket 9288 field reports concerning Intel run time benchmark rig and PC User group work around.

³ See Robert Lande, The Price of Abuse, Intel & E.U Commission Decision, June 12, 2009.

See Robert Lande, AAI working Paper #09-02, American Antitrust Institute, antitrustinstitute.org

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

FTC in Intel Settlement Talks; before July 22?

Please be advised this analyst is opposed to Intel closed door settlement with FTC on or before July 22; transparency being at issue. Commissioners and discovery team know RICO, Sherman Act Section 1 and Section 2 per se violations are documented. This analyst encourages the September hearing proceed accordingly for full disclosure, full remedies, consumer recovery which is a core value of the FTC's charter.

Advantageously and for hearing efficiency, all Section 2 Rule of Reason claims lacking specific per se condemnation precedent, can be reviewed between the Section 1 and RICO proofs, without fear of FTC 9341 overall case loss. Including waste of Federal financial and manpower resource, further, that FCA has already been won on weight of evidence and is itself capable of recovering a portion, if not all, FTC 9341 litigation costs.

This analyst believes it important that every American know how to spot competition espionage occurring in the work place in real time, how to report in real time, how to resolve in real time and not over 18 year's time as in my case. In this continuing case of Intel monopoly analysis, meant for FTC and DOJ discovery, leadership, error correction, law augments, inter Nation competition policy evolution, Intel Network, system and structural improvement, RICO and competition remedies and consumer recoveries.

In addition financial recovery of the economic damages for all targets harmed and pushed under by Intel Network, including in the Docket 9288 case obstruction are required under Intel's DOJ antitrust compliance obligations. That is for Intel and Network executive amnesty and or immunity from maximum antitrust and RICO damages. This would seem to include those associated with FTC Docket 9341.

I'd presume Intel is participating in reversing the frame and fraud associated with Docket 9288 obstruction. Alternatively in the face of a known obstruction in the administration of justice which includes witness tampering, fraudulent construction and white wash, the Docket 9341 clock could be reset to June 11, 1991. June 11, 1991 is the inception of the Intel Insider scheme enabling a complete Intel monopoly consumer recovery.

Pursuant to Docket 9341, I am concerned that \$72 billion dollars in monopolization have been calculated. And that the worldwide consumer recoverable from Intel tied charge back, and monopoly price of up to \$42 billion, will be left un-recovered or left on the negotiating table in any FTC closed door Docket 9341 settlement.

Our knowing this fact of the consumer recoverable, *legitimately*, consumers are due their return from Intel and Network members. The history of Intel class actions suggests any privately litigated consumer class action will be blown or settled on disproportionate values too harms. This attorney opinion is supported by historical evaluation, including attorneys who would take the FCA, if not for their knowledge of the history of Intel market rigging, the various corporate political, time trap and litigation hurdles.

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

Intel Network adverse litigation for year's has been sand bagged, blown, thrown and settled on minor causes with slim remedies and minor financial recovery in relation to harms. Here our countries history of private antitrust litigation ends until attorneys who would risk toughest corporate, political, legal and judicial hurdles resolves itself. FTC and DOJ can restart that tradition of private antitrust litigation with full Intel Network disclosures, monopoly encompassing remedies and recoveries, where world wide consumer recoveries are due consumers including the Federal government.

Bursting boilers and the Federal Power, Garrison Dam Disaster and the Federal Power, Bar Pilots and the Federal Power, Finance & Securities Disaster and Federal Power, broken oil well valves and the Federal Power, broken regulatory & the Federal Power; fixing broken Intel and the Federal Power, transparently, offers the potential for one of Intel's greatest legacies. A cornerstone on which willing members of Bar and Bench, and corporate entities, will see and take action regulation seriously. Lacking Bar and Bench free from corporate political network control, I fear broken regulatory will remain. A functional regulatory, Bar & Bench, are required first lines of monopoly and rackets error detection and correction.

Pursuant to FCA, I will be requesting Congress and/or President Obama please assign a Federal attorney for qui tam representation. A case to whom I am recognized Relator and hold the U.S. Attorney recovery reward letter, having been steward for many years before and following my official Relator status. No legitimate private attorney will take the case in the face of the market rig.

Fifth, finance and investment bankers use Quanda model, with price projection tools, to model Intel revenue and margins; like media retrospectively, to play the stock up to two years in advance.

Sixth, Intel inside individual stock traders can do the same thing as I've demonstrated to FTC and U.S. DOJ.

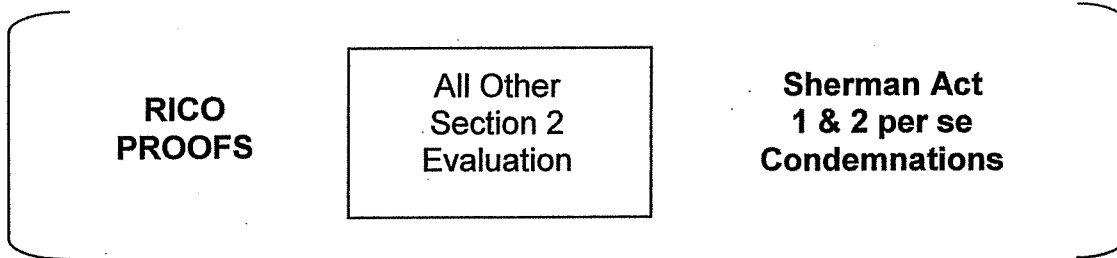
Seventh, the Intel Quanda on mass weight of use, retrospectively, extended Intel's x86 and PC market rigs to the NASDAQ; including in relation to other exchanges. Think about it, Intel Insider ability too play the stock of Intel and PC Dealers up to two years in advance is an extreme catalyst to rig not only individual stock prices, but the NASDAQ index itself. The Quanda was used to rig markets; Intel had DOJ 1st report responsibility.

Eight, combination and cartel proofs exist throughout Intel economic and system structural proofs. Structural proofs are easily deciphered from their component patterns and prove intent to monopolize per se. No other conduct proofs are required.

Nine, U.S. Department of Justice and Federal Trade Commission are well aware of the Section 1 per se condemnations, Section 2 per se intent, RICO, Quanda and its reliance by Intel Network as one of their many market rigging tools.

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

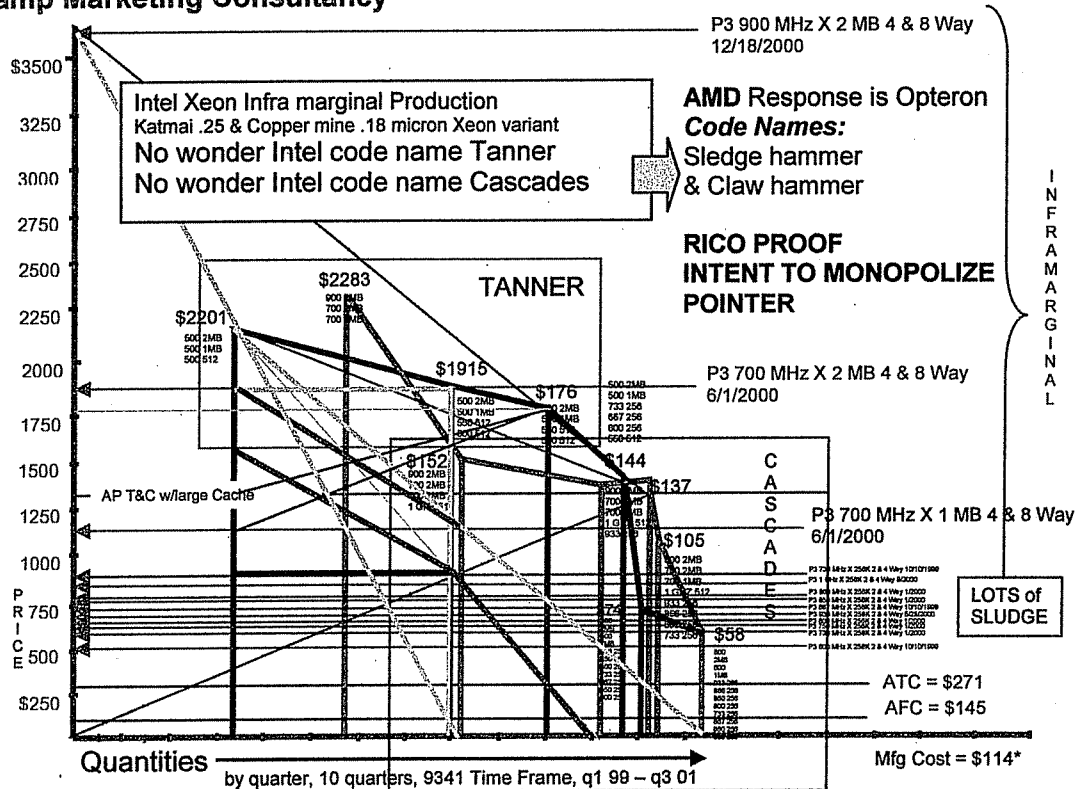
Section 5 Umbrella under which per se violations are currently masked



Ten, for FTC there is no risk of Docket 9341 case loss where all Section 2 Rule of Reason claims concerning access to Intel component taper, Intel benchmark rigging, false statements to Federal procurement by Intel, Dealers and Agents concealing fraudulent and monopoly costs assessed on the Federal Government computer payment claims. All can be heard within the bracket; Section 1 structure, Section 2 intent and RICO proofs. Please consider one of multiple proofs below:

In the RICO proof below, find partial classic Intel Xeon Tanner and Xeon Copper mine economic analysis. Playing signaling revealed by the Quanda, savvy PC Dealers were informed to stick with the quasi static equilibrium and back eddy offered by Xeon Tanner, and to avoid being washed over the falls that is Xeon Cascades.

Camp Marketing Consultancy



Mike Bruzzone, Camp Marketing Consultancy

*Note: MDR stated Mfg Cost well understated for this eon variant.

FTC 5/18/2010

SEC, U.S. Senate, Congressional Committees, State Attorney Generals, U.S. Attorneys

Cascades is the Intel desktop microprocessor Copper mine 256, repackaged as a high performance Xeon server product at monopoly price premium and for dumping onto AMD. Xeon Cascades was not a high performance product and by June 2000 main board suppliers serving the broker system market, had rejected it, causing Intel to cancel its retail boxed version of the Cascade product line. Cascade's was then left to sell through Intel primary Dealer channels.

Please note that AMD Opteron code names; Sledge Hammer and Claw Hammer, follow in response to Intel Network notice of Tanner signaling and pending Cascade predatory product dumping. Dumping is relied on by Intel a lot. Strategically to stop current competitive product flows in channels or to make it unprofitable for competitors to enter that product category.

In Conclusion

Intel Network case matters are about insuring innovation production short run to short run. Preserving ability to innovate based on examples that demonstrate Intel methods of creative destruction can be very destructive economically, structurally, holistically and socially. Intel Network RICO is proven. Section 1 and Section 2 case proofs wait to be discovered by FTC or sit delivered at FTC and DOJ waiting hearing stage.

I look forward to open Intel hearings for a transparency that will educate every American on forms of domestic economic terrorism caused by illegal monopolization, combinations, cartels, frauds, theft, deceit and the cover ups that have stymied these Intel Network case matters from their complete remedies and resolutions for over a decade.

Freedom to compete in an open environment free from the undermining effects of chaotic forces is our future. A difficult task where our successful completion can become one of democratic capitalism's greatest triumphs.

Respectfully Submitted

**Mike Bruzzone
Camp Marketing**

**FBI Original Source of Intel Network RICO; 1996
FTC Invited field reporter Docket 9288, 1998-2000
CDOJ and NYDOJ first to report; 1998
CDOJ lettered to work report; Intel Section 1 Framework; 2000 –
SEC Notice; 2007
U.S. Attorney NCD recognized FCA Relator; 2008
FTC voluntary analyst Docket 9341; under Labor Code 3363.5; 2009**

Journalism Oversight for Democracy Prerequisite; revision 3
Mike Bruzzone, Camp Marketing
 campmkting@aol.com

Introduction:

"The specialization of science is an inevitable accompaniment of progress; yet it is full of dangers, and it is cruelly wasteful, since so much that is beautiful and enlightening is cut off from most of the world. Thus it is proper to the role of the scientist that he may not merely find new truth and communicate it to his fellows, but that he teach, that he try to bring the most honest and intelligible account of new knowledge to all who will try to learn . . . it is here in teaching of men who by profession must themselves be both teachers and taught, that the narrowness of scientific life can best be moderated, and that the analogies, insights, and harmonies of scientific discovery can find their way into the wider life of man".

Robert Oppenhemier,
Prospects in the Arts & Sciences, 1955

In relation to Federal Trade Commission June 8th Docket 9288 complaint, the settlement proposal addresses three issues which in the opinion of this analyst are insufficient. That Intel cannot cut off customers, stifle competition, and impede innovation in relation to intellectual property disputes. Incident's where Intel shuts out rivals, changes the structure of organic competition, steals the intellectual property of competitors and then offers to license on Intel terms after.

Disputes raised by enterprises who are horizontally and vertical compliments, as well as competitors to Intel. Independent enterprises with know how and technology enablement capability beyond Intel franchise. These are more than just companies working on extensions of Intel reference designs or system integration and distribution houses. They are established contributors to domestic economic renewal that maintain ground up technology enablement expertise. Know how driving development of competitive semiconductor, microprocessor and compute platform architectures in relation to Intel's own.

Unique and differentiated approaches to computing; Alpha, Clipper, Power PC, Sparc, Nx586, Nx686, AMD, Cyrix, Rise, IDT Centaur and Transmeta alternative x86 offerings. Offering a broad foundation for subordinate economic potentials to attach, that are unique system block, logic and system implementation's supporting these co-development initiatives. All minor in volume compared to Intel architecture yet capable of seeding innovation, too drive new business structure, including new levels of product utility and economic benefit for computer user's world wide.

Thus competitive threat's capable of upsetting Intel status quo. Where inventive corporations with the potential of displacing parts of the Intel monopoly derived surplus barrier are intellectual targets to be leveled. To be targeted and stripped of

their incentives, inventive and competitive potentials, know how, manpower, financial resources and branding ability.

Disrupt bread and butter 'Intel architecture' PC sales for companies with enablement expertise on the one hand, and their ability to fund alternate computing approaches whether replacements or substitutes to Intel architecture, can be compromised on the other. I trust this dispels a myth perpetrated by some academics, press and analysts. That the few domestic microprocessor and compute platform companies remaining with ground up system design and development capabilities are in fact Intel competitors.

Alternative processor and computer company's then are a threat too Intel Network. Options for these inventive companies then are simple. Bow to Intel and be assimilated. Walk a thin blue line. Defend against proactive and premeditated obliteration. Carry along a larger constituent club.

"One of the most challenging, and tantalizing propositions of what may be called the larger economics, is that the success of economic institutions depends to a large extent on the nature of the whole culture in which they are embedded, and not solely on the nature of these institutions themselves".

*Religious Foundations of Economic Progress
President and fellows of Harvard College, 1952*

Situation Analysis:

Underworld characters with local political and law protection are infiltrating legally established businesses and snatching working controls in various semiconductor design fabricators, compute systems design producers, media, venture, banking and financial institutions.

Such characters it is held have a made a bundle in the underworld; threatening executives, rigging markets, product distribution operations, concealing abuses through network manipulations, fraud, media propagandist controls and covert security operations. Pyramiding their illicit gains into the labyrinthine of the enterprise they have endangered legitimate corporate, State and Federal governance, worldwide regulatory, law enforcement and Nation's controls.

The Intel Corporation case matters are a green field for evolving constitutional, federal & state, competition, civil, labor & world human rights laws & legislation.

*Mike Bruzzone
Camp Marketing*

Various dangers loom from these industrial, financial, channel and political infestations. Where their confidence men and woman loot legitimate corporations,

sabotage product development, manufacturing, and manipulate governance within institutions from the inside and outside. They can rig situation assessment, tamper with executive decision making, dissuade from competing, will make examples out of resistors, mislead and tamper with law enforcement, jurists, Judges, manipulate elected leaders to defraud the public and Nations.

To better procure political support their network manipulations portray business operations as nirvanas of best practice. These misrepresentations enable a form of mass corruption that preys on legitimate businessmen especially those who would challenge them. They have turned happy, honest corporations into devils dens leading in the consequent demoralization of an orderly society.

I cannot over emphasize the danger that can lie in the muscling into legitimate industries by hoodlums, there is too much evidence before us of racketeers and industrial spies teamed to gain control over legitimate technical, product, investment and media concerns. Positioned by their propagandists as leading executives they utilize all the old mob tricks – extortion, strong arming, threats, pay offs, sabotage and constructions. Efforts covering their crime ring's criminal advantage over legitimate competition, democratic methods of capital accumulation for reinvestment and economic renewal. This break down has endangered all legitimate enterprise institutions in performing system regulatory and governance functions across all democratic societies.

"Participation as an ideology in American society seems to be of growing importance just when technical complexity threatens to limit effective political choice. The actual scope of citizen influence on technological development depends on many of the usual factors that affect any political decisions: leadership, community, organization, access to the media, the visibility and urgency of the issue.

Information can be mustered to support either side of a debate, and power hinges on the ability to manipulate knowledge and control uncertainty. Technical expertise, therefore, is a crucial political resource in politics and technology. And the key questions focus on the relationship between policy makers and their experts, on the ways in which decisions about innovation deal with uncertainty concerning social costs, and on the dilemma of democracy in this increasingly complex and professional policy arena".

Dorothy Nelkin

Technological Imperative vs. Public Interests, 1976

This August 2000 edition of the Art & Science of Camp Marketing Brief hopes to trigger reflection on social, civil, industrial and political issues associated with U.S. vs. Intel: FTC Docket 9288 and now 9341. For eighteen years this analyst has recorded and reported on organized crime infiltration molding the state of competition in the x86 microprocessor, PC platform and media markets. Detail's

associated with discovery and recording criminal infiltrations into Cyrix, NexGen, ARM, AMD, PC distribution and media channels. Where organized crime intent was meant to dismantle competitors, too monopolize the x86 and PC platform markets, to loot competition, competitive enterprises and Nations.

Now at the level of inter nation dialogue moving toward Intel Network remedies. Responsible frameworks for monopolist and rackets error detection and correction, within Intel, cluster and channels, for the provisional administration of a remedial framework assuring regulatory compliance and monopoly oversight control.

From anyone who can add value. These crimes are not unknown to many of the observing witnesses reading these communications. Many who are capable of bringing specific knowledge to the situation assessment for a complete and total democracies' solution.

Contribute by reporting publicly through your mass media outlet or write:

Attn: Secretary
Federal Trade Commission
Docket 9341 Public Comment
600 Pennsylvania Avenue
Washington, DC 20580

On Enterprise Networks -

We are about to discover where between truth and justice, the four corners of misfeasance, malfeasance, fraud and accomplice competition rebounds on legitimate address of all subsets of the Intel Corporation competition case matters. These are enterprise remedies for participation, industrial stability, economic efficiency, competitive and employment potentials, revenue and profit contributions.

On this subject as field reporters we have options. Silence, or that worse option, the mimicking repeater of the certified Intel Blogger, alternatively, the all encompassing business report, investigative report or opinion piece.

This innovator in a tough environment for innovation chose investigative reports. Reporting that supports the journalism tradition of corporate political oversight, as a best practice, for protecting freedom in any democracy; chose yours.

On FTC Docket 9341 settlement proposal we've heard from Intel Network and herd. Now act for society on journalism as one foundation for our democratic freedoms.

"A free press can and should be an accountable press. The received wisdom of press freedom assumes that freedoms and rights can be free standing. In fact, there are no rights without counter part obligations and duties." Onora O'Neill, Doctor of Philosophy, Cambridge University

Where journalism as a democratic protection can introduce the need for legitimate corporate governance institutions; rackets error detection, support courage to admit organized crime infiltration, timely correction, for monopoly and organized network crime prevention. Where Intel DOJ antitrust compliance obligations have always required Intel employees to be the first to report and remedy. That is not to attack those who are first to report. Or too deny and then too attack. More so we cannot negate this inherent report responsibility from citizens residing in a civil society. Responsibility to report where ever competition espionage endangers enterprise, municipality, State, Nation, life and liberty, industry, competition, truly a free press and our freedom to compete in a functioning democracy.

Every American needs to be familiar with the indicators of competition espionage occurring within the enterprise and how to report it for remedy in real time. Intel Network and associated x86 and PC market failures are our foremost teachers.

"The ingenuity and the perseverance of industrial management in the pursuit of economic ends have changed many scientific and technological dreams into commonplace realities. It is now becoming clear that the application of these same talents to the human side of enterprise will not only enhance substantially these materialistic achievements but will bring us one step closer to the good society. Shall we get on with the job".

The Human Side of Enterprise
Douglas M. McGregor, 1957

Where knowledge based solutions that free critical industries from mob controls can deliver everyone a return to the well regarded principles of democratic capitalism. Where investments and capital accumulations are naturally grown and sustained on an enterprise's good business decisions, and not on the decisions of a criminal network in an Intel police state.

Universally accepted methods of level industry supporting open participation from all contributors, based on organic models, where all are naturally enabled to pursue their full potentials and none criminally limited.

Please pursue the journalist oversight cycle, over and over again, until technocracy gets this right.

"As originator and prime mover over the mass-production revolution, this country has risen to world leadership and become the greatest power. So far this leadership has been confined to the realm of technology. We have not developed the social and political institutions to go with this technology. But precisely because mass production technology is a corrosive acid which no pre-industrial culture or social order can resist, the world requires a working model of the political and social institutions for an industrial age. Without such a model to imitate and learn from, the mass production revolution can only produce decades of war,

chaos, despair and destruction. If the model is not furnished by the West, if it is not a model of a free industrial society the model will be that of a slave industrial society.

If this country fails to serve as a working model, it if does not succeed in developing at home a functioning and free industrial society, our very technological leadership will bring catastrophe to the world and to our selves. It will lead to the acceptance, on a worldwide bases, of institutions and beliefs unacceptable and deeply hostile to the basic beliefs and institutions of the American tradition and to the tradition of the West. In such a world, the United States could not maintain its own institutions and perhaps not even its independence. No amount of military strength, no success of anti-Communist diplomacy, no Marshall Plan, could in the long run prevent this. These, however, necessary and beneficial, are stopgaps and futile in the end unless they are followed up by the assertion of world-leadership which only the successful development of a Constitution for a Free Industrial Society can provide."

Peter Drucker, The New Society, 1950

I suggest the structure of scientific revolution associated with Intel Network monopoly represents one of the worst case scenarios of what can go wrong when any government allows protection of an industry by a sub-society of its participants. In this case engineers under the influence of professional managers who are the members of a cross enterprise, cross profession network crime ring. Who through the extended period of their proactive chaos dismantled multiple enterprises and industries cloaked behind the back drop of a worldwide business and economic realignment.

Beginning 1991 escalating even today corporate influence networks have proven themselves untrustworthy; for governance and oversight, including as government educational resources. In this worst case Intel example where a monopoly for two decades is granted total control, and unfettered freedoms, to pursue whatever course it chooses to achieve its desired level of industry, economic and trade law protectionism. Intel x86 microprocessor and the disintegrated cells of the intra-platform PC market was the worst possible choice for a monopoly experiment of this type.

"The government's need for science has frequently stimulated it to new organizational experiments. The basic problem has been that, much as the government needs science, science has, by and large, offered its services only on its own terms. Those terms have been support without control, or in other terms, power without responsibility".

*Carrol W. Pursell Jr.
Science & Government Agencies, 1966*

Today the value of production continues too consolidate toward the few capable of its mass production. Where a history of monopoly abuses by organized crime continues in industries where technocrats utilize the mysteries of their business specialty to gain control from active governance, democratic forms of competition and system regulation.

Yes, action regulation and governance do help. Too prevent cross enterprise organized crime infiltration, and to insure the means to deliberate on issues of correction and control, methods and results of actions which in fact touch upon all of us; in every industry, across all civil society.

"The political world is today defined through its relation to the technological society. Traditionally, politics formed a part of a larger social whole; at present the converse is the case"

*Jacques Ellul, Sociologist
The Technical Order, 1962*

While this analyst feels the Intel Combination achieved its objective of domestic PC protectionism, the network franchise did so for its own vested interest unobservant of law. Where there has been a war against the capital, economic, civil and human rights of many regardless of these harms still being masked over by Intel invented reality.

Intel intra platform PC vertical by horizontal sales system wiped out a massive number of domestic inventors through methods positioned as beneficial to U.S. economic growth. When, in fact, Intel Network through artificial system accelerations to rig and monopolize markets drove an international political bumble whose effects are now known. By you and me and officials within industry and government, across multiple nations, on which Wintel and America will continue too be judged.

A systematic reconfiguration of industry and channels by organized network crime undermining economic rights and democratic foundation's across many countries. Crimes masked by organized network crime. A crime ring that today is scattered across and buried into multiple corporation and media enterprises. The result of two decade's of delay in error correcting Intel Network from our overcoming the deceptions and misrepresentations that comprise the Intel lie.

Students of democratic societies recognize that when large organizations wield concentrations of economic power, political power is not far behind. The unnamed fear behind this realization is of a drift toward fascism, where the power of large organizations supplants the role of the individual in society."

*Charles Geis,
Monopolies in America, Oxford Press*

On Intel -

As astonishing as it might seem, there is nothing unique or complicated about the way in which Intel monopolized the x86 microprocessor and PC platform markets. The methods are as old as guild control of commodities, secured through majority ownership of production facilities, some sharing of production data, ability to manufacturer in excess of demand, to control surplus ownership, its value distribution, and in these technologic times to accelerate distribution system structure and to conceal that acceleration in combination with mass media.

Through every kind of terrain, the signposts are there along the roadside. Sometimes they point out the hazard's, other times the general direction, the turns or forks in the road. It is in the congested valleys of the industrialized West that they are often obscured along detours or diversions cluttered with neon lights and billboard advertising. The system sign posts are still there, but they have to be carefully sought out".

Robert Campbell,
Management Consultant - Mobil Corp.

Where some media enterprise participated in propagating espionage's forcing computers onto consumers for a fee, while hiding behind our first amendment right. This aspect being hideously noteworthy; relied on for microprocessor and intra-platform monopoly maintenance, product routing, industrial concentration, to steal the revenues of one company and to divert those revenues to other favored concerns. Too artfully cover the simplicity of these anti-competitive and criminal acts. To create the counterintuitive illusion of an Intel Nation success out of fundamentally much less.

After earning stewardship over a natural x86 monopoly, and shortly following the SBC 386-16 MHz development cluster, Intel's intent to monopolize through anti-competitive means in violation of law was clear. As of October 1989, and with volume production of the 386-33 class platform, Intel had established a channel surplus of graded 386 CPU product; effective as a monopoly price support, and had demonstrated the utilization of legal rigs, retroactive restraints, production capacity and allocation to suppress other x86 microprocessor design fabricators from competitive market entry and channel growth.

"A near monopolistic company may be especially privileged, by insisting on longer (production) runs without incurring the loss of large stocks. This can be done by the simple expedient of holding the customers to ransom and making them accommodate the necessary stocks. It is fortunate for the national economy that few companies are in a position to get away with this, for it ties up unnecessary amounts of capital".

Dr. Stanford Beer, Industrial Scientist, Decision & Control, 1966

Channels, as the 486 platform transition occurred, now filled with aging strata of prior Intel CPU class and speed grades. Class and speed grades that as the Intel monopoly matured would be dumped onto competitors as a method for their elimination. Speed grades ideally sold by channels on a first-in-first-out basis for capital recovery. So that new product, both Intel and competitive substitutes and replacements, could be purchased and enter some channels. Substitute x86 microprocessor and microprocessor platform replacements offering utility value to consumers including a lower price. However a price that traditionally delivered lower margin to channels. The stage was now set for the combination of Intel's PC development with channel bottleneck monopolies into the Intel Power Complex.

Intel is an anomaly in our domestic technology industry. While other semiconductor and inter platform PC design/manufacturers produce from a forecast of customer demand supporting process economic migration, Intel over produces to monopolize process, utilizing its production might combined with intra industry financial incentives to block others from competing and entering the x86 and PC platform's market.

There is nothing new or complex about these methods of monopolization addressed in antitrust and commercial case law precedent. The next time an Intel representative proclaims Intel is not a monopoly you can inform them you know differently. As a result of Camp Marketing Briefs and from some of your own observations and experiences, you know the truth. Publish on it.

On Media -

Through a ten month IPO quiet period when your primary competitor is Intel, and during the second quarter of 1993 in the midst of all out war with Ziff Davis, two Cyrix employees appealed to the publisher of PC World to explain why this was happening. Why was Cyrix being attacked by another industry and specifically Ziff Davis? This soon to be president of IDG stared into space for a moment and said one thing, "they are a profit maximizer".

What we know now is the greater foundation on which this strategy was driven. Intel is not just a profit maximizing monopoly. Intel is a sales maximizing monopolist. Capable of driving marginal revenue gains from a predetermined production plan that can deliver multiple periods of monopoly profit across anyone production short run. Monopoly profit required to offset the cost of a pressed lithographic acceleration required to maintain Intel's process, x86 microprocessor, and intra platform PC **monopolies**.

Where media could plan ahead of Intel cash intake based on the Intel production plan. Knowing full well they could plan, model, and shape their own revenue growth within this Intel planned economy. Including concentration of satellite sales toward their own tied sales channels. Based on agreed upon contracts, rebates and discounts, with Intel, that protect leading channels and built upon their market

shares. By media misappropriating and redirecting competitors share. Where the use of many illegal restraints lead to the systematic elimination of Intel horizontal competitor's, and the lateral concentration of Intel PC dealers, given known parameters and programs including those which PC Media was directly involved.

Program's for which Ziff Davis played a crucial role. Where the Ziff Davis sales force rolled out and initially managed the Intel Inside program. A first move for Intel and Ziff Davis that forced other PC media too participate in the pursuit of these immense and illegal Intel Inside ad pools, or financially be left out of this game. A program that would eventual spread to the entire media layer, across multiple categories; PC print, business print, local newspaper, broadcast, web, and leaves us with the democratic mess, and the affront on journalism we have today. Including journalism's continued democratic error to remain mum on this subject.

Over the last 15 years how many journalists have thought about walking into the Publisher's office and asking why?

Corporate plus media combination in a tied sales system has been incredibly destructive. The ability of media operating in vertical by horizontal sales agreement with Intel; a bottleneck monopoly, to misappropriate the sales revenues of one PC company for redirecting those revenues to another PC Company is an espionage. Under commercial code in similar situations we know it's a racket. This commercial fraud sales loop hole needs to be closed permanently; including by augments to RICO and antitrust law.

"The megatronic system or power is the source of our troubles. Rampant technology results from the decisions of anonymous technocrats - scientists, engineers, attorneys, corporation and publishing and advertising executives. They compose the 'system' which attempts to gain complete power and to extend its authority into all areas of human life. We must resort to cultural inventions to rid ourselves of their system".

*Lewis Mumford, Sociologist,
The Technique of Total Control, 1970*

By 1995 continuing through this decade in combination with Intel and primary OEMs, media would be instrumental in the use of system's structures to deposition the marginal utility value of substitute products and platform replacement's, while agreeing to fix Intel PC platform pricing by CPU, core logic and platform class in cooperation with some Intel Dealers.

PC World and other's participated in, while Ziff Davis lead many of these Intel programs. Including too actively shift manufacturer share, and revenues, to specific Intel Combination OEMs who are media's major advertisers; insuring media's own revenue gains. Racketeering, Section 1 vertical by horizontal combination and Section 2 intent to monopolize are noted.

Recognizing the sole hold out Byte Magazine, who like all dissenters is blacklisted and put out of business by Intel Network.

In this closed distribution system, Ziff Davis and media communications in general, through various environmental interactions persuaded industry, often through extortion, to adopt too mob practices and controls. Alternate x86 senior executives could have averted this situation on at least three occasions in the 1992 through 1993 timeframe. Intel and media executives, on the other hand, could have prevented it from happening all together. This is Intel Networks foremost crime.

Guiding levels of dialogue on technology concern:

From Technology and Change Boyd & Fraser 1979
Courses by Newspaper - National Endowment for the Humanities

- 1) Immediate or urgent problems such as unchecked technological advance related to our physical environment; quality of air and water, endangerment of species, climatic changes.

The exploitation of consumers, hazardous working conditions, the use and misuse of computers, nuclear reactors and radioactive waste.

- 2) Tracking down the sources of immediate and urgent problems which are spawned by technological advance.

To determine responsibility or to pinpoint deficiencies in the structure of the economy, political, legal or societal institutions or customs, which permitted the problems to arise in the first place.

- 3) Philosophical and ethical considerations having to do with the very nature of technology and what effects its development on human beings.

FTC Docket 9288 and 9341 touch all three areas concerning technology change considering anticipated implementation of Intel Network environment and democracies remedies.

On domestic microprocessor, other semiconductor and computing platform management –

Coming events cast their shadows in the present. As we study those shadows through 18 years of Intel Network monopolization it is possible to observe the forces and trends shaping the future of microprocessor, semiconductor and compute platforms development. Force's that affect the stability of industry and nations and will continue to shape management styles of technical concerns into the ensuing decade.

Where executive prerequisite of legitimate governance and corporate fiduciary responsibility over network system's and practices has never been as great. A management responsibility for insuring open innovation across industries based on organically sustainable growth models.

Responsibility that supports the scope of participant's for industry stability, profitable expansion over sales concentration, for organizational excellence, customer and stockholder value from these firms offering the potential for technical excellence into a new millennium. Leadership best practices based on a return to democratic principles, democratic rights supporting the freedom of any individual to invent, enable, produce, and market free from criminal effect.

The microprocessor, segment, platform, channel or partner manager of the future has and will continue to encounter accelerating growth in the size and complexity of organizational systems, technical coalitions and camps. Whether emancipated members of the former Intel Power Complex, traditional competitors set free, among channel's including media, for a re-emergence of independent inventors and platform design and manufacturing clusters.

Where technical development and marketing has been moving away from the formal authoritarian and hierarchical management style's of a monopoly computing concern. Mired in industrial and channel dogma, bound to their x86 surplus racket, where vertical by horizontal ties among Intel PC and Media Dealers were disguised as legitimate value streams for a very long time. Where corporate gangs have demonstrated control over certain development, industry production and end markets for their own aim and that of their channel puppet masters. Debilitating to every Nation calculated on the costs to society from Intel Dealership. With antitrust and RICO multipliers = \$528,000,000,000.

As industry transforms one would hope movement away from this frightening trend, reversed and redirected toward more informal, equitable and fluid ways of bargaining, brokerage, advice and consent, service to customers, stockholders and employees. Service based on a return to management best practice and principle given a renewed emphasis on equitable values. Industry values free from integrative mob attitude forced onto others. The application of intellectual property rights of owners, freedom to develop and compete independently including in cluster, fair bargaining, corporate and government support of these rights including antitrust law, the practice of management ethics and employee rights. Too reverse all harms and recover from an era where lack of ethics has lead to lacking management if management at all.

"As soon as the problem of freedom as opposed to laissez-faire - is seen to consist in the creation of free zones within the planned structure, the whole question becomes more detailed. Instead of the unified and abstract conception, concrete issues arise. The various historical interpretations of freedom, freedom of movement, freedom of expression, freedom of association, freedom from caprice

and tolerance are all special obligations which must be met by the new society. - Karl Mannheim, Freedom Under Planning, 1941

Evidence of the increasing complexity of organization is observable in the growth and influence of the Intel Power Complex, the formation of transnational camps, investment and bank holding companies, distribution cartels including corporations in combination with media to manipulate industry, consumers and government.

Where corruption in and around Intel forced corruption onto other's as a method to compete. Among corporate entities who dominate much of the global production and growing at such a rate to eclipse the potential of new entrants. Entities no less than individuals, whom exert great influence on the world's affairs and have grown in economic size beyond all but the wealthiest Nation's, and have demonstrated an eclipse in the power of democratic government, justice and law.

Catalysts for economic and social upheaval that has and can continue to rival the impact of any prior revolution. Delivering opportunities for industry, management and system reforms that can in fact be revolutionary. For technical governance institutions to demonstrate that semiconductor, and compute platform companies, are once again in control of their valley's namesake and all around the world.

Where their network marketing, distribution, HR, sales and communication princes and princesses are as obsolete as their racket's and practices. Industry and society at a critical juncture where action regulation can support reform sending a signal of emancipation, or where no action signals business as usual under environmental mob controls.

The environmental factors and forces at work, such as changing human and management values, along with rapid technological advances, the growing size and complexity of organizational patterns have blurred the traditional lines of morality, what are in the best values of the corporation and for stockholders, what is in the best interest of the private and public sectors. And have changed the very foundation of management itself. Where the application of intellectual activity and service too mankind has degraded under the Intel x86 microprocessor and intra platform monopoly status quo.

"Once technology risks have been assigned, the safeguards evaluated, the costs calculated, one is then prepared to worry about distribution. Who will enjoy how much of the benefit? Who will bear the burden on the uncertainty or the price tag of the costs? Here is where normal politics - pressure groups, social and economic power, private and public interests, bargaining and so forth - enters.

We expect that those most aware, best supplied, and most active will manage to steer a larger proportion of the advantages of technological productivity their way while avoiding most of the disadvantages. But for those who have raised technology as a political problem under this conception, reforms are needed in the

distribution process. Even persons who have no quarrel with the inequities of wealth and privilege in a liberal society now step forth with the most trenchant criticisms of the ways in which technological "impacts" are distributed through the social system. A certain radicalism is smuggled in through the back door. The humble ideal of those who see things in this light is that risks and costs from a particular innovation should be able to account for the consequences beforehand. They should also shoulder the major brunt of the costs of undesirable side effects. This in turn should eliminate some of the problems of gross irresponsibility in technological innovations and application in previous times.

Since equalization and responsibility are to be induced through a new set of laws, regulations, penalties and encouragement's, the attention of this approach also aims at a better understanding of the facts of practical political decision making.

Obviously the 'implementing' systems have a great deal to do with the eventual outcome. My question is, however, in what technological context do such systems themselves operate and what imperatives do they feel obliged to obey?"

Langdon Winner, Political Scientist

Technology as Legislation - Autonomous Technology, 1977

The future executives of microprocessor, semiconductor and platform enablers must gravitate toward the concept that they are responsible for their activities, people in general, the advancement of industry, customer, stockholder and employee values, to do away with criminal activity, expecting a renewed focus on institutional governance over their business affairs to maintain justice, law, civil rights, democracy and democratic capitalism.

A technical environment regulated for supporting independent contribution, invention, development, manufacture, law abiding marketing, sales and communications. Supporting constituent and consumer freedom of choice; where you don't have to cheat to compete, made possible through adherence and maintenance of liberty by legitimate institutional governance which must become a real Intel value.

No business or governmental organization, whatever its formal relationship, will be able to escape these industry, customer, stockholder, social, public and citizen responsibilities. All levels of management will be faced with the major responsibility of merging human values with the potential from technological advance to preserve human capital, the creation of goods and services for improved lifestyles, in the interest of everyone, where economic potentials based on democratic principles sustain liberty.

Today's professional managers must modify their managerial styles and methods in manning the transition toward the era of public managers who are both economically and socially oriented. Operating in the best interest of their

customers, employees, society and operating in the service of stockholders free from mob effect.

Managers can develop from a hired man status for private corporation shareholders into business institutional leaders who will manage the enterprise for the best balanced interests of society, to preserve and maintain the private enterprise system, individual participation, industry sustainable growth models, for technical invention and enablement. These concepts are essential for technology growth and management into the future.

"We still think and talk of the basic problems of an industrial society as problems that can be solved by changing the 'system', that is the superstructure of political organization. Yet the real problems lie within the enterprise. It is not the solution of the problems of the 'system' that will set the structure of the enterprise. On the contrary, it is the solution of the problems of the enterprise that will shape the system under which we shall live" - Peter Drucker

In Conclusion –

The ramification of U.S. v Intel; FTC Docket 9288 and 9341 cross all levels of technology concern reflecting on the path and impact of technology, its use and misuse in human society. Noteworthy these Section 5 actions identify substantial economic and per se violations of law and pass all judicial filter's prompting immediate movement to hearing including criminal proceedings.

For FTC Intel settlement step, no doubt under cartel amnesty of some sort, Intel chief executives owe each of us, all society, a complete, honest and rationale explanation of what has happened their from their vantage. A civil necessity for our understanding how to recognize and remedy competition espionage occurring in the workplace in real time, and not over 18 years time.

Lacking this citizen requirement and to do otherwise over the next decade provides an open invitation for organized crime use of system mechanic's to rig the internet, command quantum improvements in semiconductors, computing, nano electro mechanical and molecular, chemical, genetic and bio technologic resources.

The social, economic and political degeneration associated with the growth of the Intel Power Complex was known and implications understood prior to 1979, subsequent growth and control over government by the Intel Business System. Technocrats, media, academia and analysts used this prior understanding to craft system's structures deployed by a constituent monopoly, and specifically the media, to manipulate and deceive our society. Too persuade us differently. Too hide this truth. The painting of an illusion to defuse what in fact sociologists, historians, economists, political scientists and some members of the technical elite already knew was occurring; that organized network crime can significantly damage society. Research, write and publish.

"From a scientific standpoint, what counts is knowledge not talk . . . if we want to continue to talk metaphorically about things called answers, then we still do better to speak about finding the answer, than making it . . ."

*Gabriel Stolzenberg,
Inquiry into the Foundation of Mathematics*

To: U.S. District Attorneys
State Attorney Generals
United States Senate
Congressional Committees
Chairman Leibowitz, FTC
Director Robert Mueller, FBI
Honorable Eric Holder, DOJ
Vice President Joseph Biden

Fm: Mike Bruzzone
Camp Marketing Consultancy
6025 McBryde Avenue
Richmond, CA 94805
Campmktng @ aol

Re: Intel Corporation Competition Case Update – Federal Qui Tam Recovery

- **Intel Inside rebated fee consumer recoverable doubles to \$42 billion**
- Intel Microprocessor Broker Dealer Analysis
- Exhibits for considering Intel Cost/Price Analysis
- Partial exhibits to satisfy District Judge Farnan B.O.D. Futility Hurdle
- Lettered Relator Seeks Attorney; FCA, 31 USC 3279, recovery of monopoly & fraudulent cost imposed on Federal Government's Intel based PC purchases.

**Honorable District Attorneys, State Attorney Generals, Senators, Congressmen,
Director Mueller, Honorable Eric Holder, Vice President Biden:**

Pursuant to Camp Marketing Consultancy ongoing Intel Network case assessment:
Consumer recoverable transport charge associated with commissioning media sales agents to route Intel x86 microprocessors inside the computer chassis of Intel microprocessor broker dealer brand models, across state lines and inter nation boundaries, **doubles to \$42 billion.**

This sum is a worldwide consumer recovery value based on system works of Intel Inside rebated fee scheme described in its affiliate match for tied charge back implementation¹. Earlier communications focus on the Intel half of this system equation². Question of Intel monopoly verse dealer monopsony power reveals path for further inquiry. Exhibit 1 following page three addresses weight of broker dealer rebated fee pools as an upstream attractor. An upstream value attractor encouraging media's downstream computer brand sales push onto consumers. An artificial push based on value preferences that promote product routing and throttling of computer brand models known to carry high Intel Inside commission values. Exhibit 1 reveals whereabouts of Intel microprocessor broker and PC dealer fee pools seen through the upstream lens of one media sales agent. Note Intel

¹ Bruzzone Correspondence to NAAG, U.S. Senate, Congressional Committees, March 11, 2009

² Bruzzone for FTC, Perspective on Corporate Combinations to Design/Manufacturing Clusters, December 1999

**U.S. District Attorneys, State AGs, U.S. Senate, Congress, FBI Director Mueller,
U. S. AG Holder, Vice President Biden**

broker dealers can vary slightly, by computer product category and audience segment of individual media agent routing vehicles, shown from extended analysis.

Total Intel Inside rebated fee sum of \$42 billion includes \$21 billion previously reported from Intel financials, recognizing times two, takes into account broker dealer matching funds misrepresented in PC company financials as advertising expenditures. Ad expenditures that are cost out to end buyers, paid to media sales agents, matched by Intel Combine from rebated fee pools. Pools whose values sustain from back in time with current and forward time customer purchase agreements. Purchases for tied charge back include microprocessor surplus stripped for margin values, including Intel Inside rebated fee, which weight individual dealer PC brand transport pools guiding media agent sales preferences.

PC Company misrepresented advertising expenditures should actually be recorded as the PC Dealer's media sales agent commission. A payment for routing Intel intra platform computer system's, over all other microprocessor based compute platforms, across state lines and inter nation boundaries including through the U.S. mail. Commission values are calculated on microprocessor price from high to low. Values are accounted for as per unit cost of the computer containing the rebated fee accrual as payment by PC Dealer to media for routing which triggers media charge back match from Intel.

As reported beginning U.S. vs. Intel FTC Docket 9288, 1998 through 2002, computer brand sell through commission values of 1.5% x 2 in 1993 and 3% x 2 by 1997, are accrued by Intel and matched by Intel microprocessor broker and PC dealers paid to media sales agents. According to E.U. Competition Commission investigation, Intel sales incentives are now as high as 10% for certain forms of Intel sales games³.

Intel Microprocessor Broker Dealer Analysis

Summary Assessment of Intel System through PC World media agent outcomes:

- Timely organized horizontal combination 1991 through 2001.
- Preferred allocation and barricaded vertical routing 1993 -.
- Juxtaposed effects of broker dealers and media sales agent.
- Broadening competition violations as AMD becomes competitive 1999 - 2005
- Combination transition to bottleneck monopoly 2002 – 2005
- Concentration of Intel dealer routing effects 2005 – 2006.
- Mature structure through to a leveling; 2007 – 2008.

Exhibit 1 shows through the upstream looking lens of PC World media sales agent, the frequency of computer brand review placements as percent over the average review participant. Total 'top spot' review placements are driven by the weight of Dealer's Intel Inside rebated fee pool. Pools include real and future time commission values available for the taking by any number of competing media sales agents.

³ E.U. Competition Commission, Intel Provisional Decision, May 13, 2009, Public Version, page 340

**U.S. District Attorneys, State AGs, U.S. Senate, Congress, FBI Director Mueller,
U. S. AG Holder, Vice President Biden**

In this affiliate sales triad composed of Intel microprocessor broker and PC dealers juxtaposed horizontally to media sales agents, all media agents compete for broker dealer current and future Intel Inside pools. More dealer review placements equate to a higher probability of that Intel media agent capturing majority of accruing brand fees for Intel Network charge back; in current and into future time. Back in time pools are released by media agent's real time computer brand sales push. This method is relied upon to capture and recapture commission values across Intel production short run to short run. Commission values that are misrepresented as PC Dealer ad expenditures, matched by Intel, from dealer's growing rebated fee pools over a fourteen year period. Where Intel, broker dealers and media agents trusted this transit system to work as long as Intel could guarantee product routing through 10 GHz frequency levels.

For publishers lag in 10 GHz ramp, Intel's preference for broadcast vehicles who receive a higher level of Intel Inside rebate, AMD based systems which begin to competitively displace and in fact ride Intel dealer page space allocation bought by Intel Inside, plus the broadening of independent hardware review web sites all contribute to the demise of Intel Inside as the food source for this broker dealer publishing racket.

Following exhibit shows 'poker.com' style statistical analysis for publisher computer brand review support revealing Intel dealer channels. That analysis looks upward in the value chain through the monetary exchange lens of media sales agents, through Intel microprocessor broker and computer dealers, directly into Intel.

Exhibit 1 – Statistical Analysis of Intel intra platform routing by dealer computer brand model in International Data Group's PC World Top PC Sales Racket. Note: Post rebated fee year 2008 level market high = 233%; market average = 166%.

Intel PC Dealer	<u>3/2005 - 12/2008</u>	<u>1999-2/2005</u>	<u>1987-1998</u>
A	113.00%	265.00%	0.00%
B	170.00%	111.00%	136.00%
C	187.00%	60.30%	0.00%
D	28.00%	0.00%	0.00%
Compaq	65.00%	364.00%	379.00%
F	195.00%	96.50%	53.10%
Dell	504.00%	1163.00%	2071.50%
H	170.00%	91.70%	0.00%
Gateway	178.00%	765.00%	1024.00%
HP	626.00%	412.00%	113.80%
IBM	170.00%	386.00%	257.00%
Lenovo	382.00%	0.00%	0.00%
M	203.00%	345.00%	220.00%
Micron	108.00%	393.00%	918.00%
O	187.00%	292.00%	98.60%
P	0.00%	200.00%	386.00%
Q	113.00%	118.00%	0.00%
Toshiba	195.00%	234.00%	493.00%
S	113.00%	7.20%	0.00%
Others			

**U.S. District Attorneys, State AGs, U.S. Senate, Congress, FBI Director Mueller,
U. S. AG Holder, Vice President Biden**

Results reveal some Intel dealers and publishing agents are cheating their 'organic' probabilities. That is by placing more of certain Intel Inside branded PCs for sale given their known high level of commission values waiting media release from dealer rebates accumulating in Intel Inside fee pools.

More granular result from 1999 through 2008 supports Dell E.U. report of Intel moving affiliate sales values to other players toward system sales end game. However Dell has also been the game's foremost benefiting participant. A game in which Dell revenues secured through fraudulent use of the U.S. mail are recoverable by government for consumers; State or Federal Government. One significant consideration is that the computer company and media executive's who worked with Intel to design the sales racket, to roll out, manage and police this Intel Inside system game may not be the same executives attempting to relinquish their enterprises from this racket today.

This analyst credits AMD for providing the vehicle on which Intel dealers are now attempting to ride a turn in the legal tide out of this racket and beyond the limiting effects of Intel dealership.

Intel Inside rebated fee accruals are determined by the gross of the x86 CPU average selling price to the PC Company now confirmed by E.U investigation.⁴ That is sales divided by microprocessor quantities to determine a per unit rebate value. Through eleven years of U.S. government input I believe the metric, and its racket, confirmed however FTC and DOJ remain mum on the specifics.

E.U investigation also supports this analyst's view that Intel Inside is an "avoidable cost"⁵ which like any tax burden shifts supply curve upward⁶. A cost that raises Intel price, is systematically passed onto consumers times two, and in real time reduces Intel total revenue generation for stockholders⁷.

Media sales commission values are stipulated by Intel Inside guide requiring Intel microprocessor broker dealers to match Intel commissioning values of 1.5% to 3% on microprocessor price. Per processor commission value is accounted paid to media sales agents by Intel, microprocessor broker & PC dealers, for recovering media's Intel cost of sales hidden as a search charge within Intel intra platform computer brand end sales price.

This program is the Intel Inside rebated fee scheme beginning 1993 with effects shown in media sales agent analysis through 2005. Intel Inside rebated fee follows the charter Intel Inside Logo program initiated on June 11, 1991. Based on rebated fee scheme metric this analyst still proposes $\frac{1}{4}$ to $\frac{1}{2}$ of **these illegal charges are recoverable by government for consumers; between \$11 billion and \$21 billion.** Recovery range does not include PC marketing and media augmenting or later sales programs that restrain inter brand

⁴ E.U. Competition Commission, Intel Provisional Decision, May 13, 2009, Public Version, pgs 334 - 337

⁵ ebid

⁶ Micahel Katz, Harvey Rosen, Microeconomics Second Edition, Irwin Press, 1994, page 384

⁷ Bruzzone for FTC, Public Comment matter of Intel Corporation; Docket 9288, May 19, 1999

Bruzzone for FTC, Perspective on Corporate Combinations to Design/Manufacturing Clusters, December 1999

**U.S. District Attorneys, State AGs, U.S. Senate, Congress, FBI Director Mueller,
U. S. AG Holder, Vice President Biden**

competition and may also raise consumer end sales prices⁸. Charter scheme was 1st reported in 1996, deciphered along legal precedent by April 1999, recorded as an obstruction of justice from defendants witness tampering within FTC Docket 9288 by 2001.

Additionally, economic analysis of Intel short production runs exhibit a consumer welfare loss, misappropriation of industrial financial values, and deadweight costs associated with Intel surplus production. For Pentium, Pentium II and Pentium III those added values **raise consumer recovery values in excess of \$60 billion.**

Per Docket 9288 that figure was estimated in 1999 by this analyst at \$70 billion including social welfare loss⁹. Again in 2000 at \$18 billion in rebated fee times 3x antitrust for DOJ action remedy¹⁰ moderated to \$50 billion in 2001.¹¹ The range of these sums are later supported through economic analysis commissioned by AMD's outside law firm O'Melveny & Myers LLP, finding Intel extracted monopoly profits of \$61 billion¹². The approximate sum is also reflected in an up to \$60 billion dollar R&D short fall impacting semiconductor process and equipment design development by Infrastructure Advisor¹³.

Upstream Intel's x86 microprocessor and intra platform PC monopolies effectively sustain Intel monopolization of fabrication equipment for process leadership processor production short run to short run.

For economic eye the answer is easy to see. Intel is not just maximizing its profit. Intel maximizes revenues. Management bonus incentives are determined on profit and revenues. Inelastic surplus relied on for economic maximization is dumped onto x86 competitors destroying their businesses. Surplus components offer a lot of extra chits on which harnessing value attachments are charged including for media kick back. Intel secures their monopoly position prior to charter patent portfolio expiration. Where Intel's objective of *racing* process to double transistor counts every eighteen months sustains a competitive process barrier that becomes a clear question of responsible science in technocracy. I've asked at Hot Chips Conference to panel of distinguished professional and academic engineers and gotten a lot of huffs and puffs. Would the race have been moderated for industry efficiency and social efficacy if economist chimed in to temper Moore's objective?

Moore's objective states that engineers have the technologies and tools to double transistor count in semiconductor devices at up to every 18 months. But should they? Intel's lead VC Arthur Rock adds fabrication facilities double in their cost every lithographic process generation. Recognizing Rock's Law, Moore's objective can be met

⁸ See Robert Lande, The Price of Abuse, Intel & E.U Commission Decision, June 12, 2009.

See Robert Lande, AAI working Paper #09-02, American Antitrust Institute, antitrustinstitute.org

⁹ Bruzzone, Perspective on Corporate Combinations to Design/Manufacturing Clusters, December 1999

¹⁰ Bruzzone to Janet Reno, U.S. AG, Department of Justice, copied F.T.C. February 1, 2000

¹¹ Bruzzone to Nat'l Association of Attorney Generals, John Ashcroft, Charles James, February 27, 2001

¹² Dr. Michael Williams. Director, ERS Group, for O'Melveny & Myers, LLP, August 2, 2007.

¹³ Ron Leckie, Infrastructure Advisors, Commissioned by SEMI, October 18, 2005

**U.S. District Attorneys, State AGs, U.S. Senate, Congress, FBI Director Mueller,
U. S. AG Holder, Vice President Biden**

by Intel raising up to twice the capital through anyone production period to sustain their process monopoly. Another one of the many ways Intel warps competitive space and product time. An efficient producer might moderate output, eliminate inelastic production from supply schedule, not sell at or below cost, pursue standard supply curve distribution so others can integrate on alternate tracks rather than be concentrated into non existence.

For Intel to secure a monopoly its business system was grown by allocation preference, combined and concentrated by systems structure, flattened as PC Dealers resisted continued Intel dealership. This does not resolve or remedy unbridled monopolization that systematically steals competitor sales revenues in a massive industrial financial and consumer theft. That is an enterprise network crime across multiple adjoining industries and professional practice areas; including some members of the California bar, all of whom are being hidden behind an engineered mask.

That system crime for full and lasting remedies must be fully detailed. Because if our nation continues to choose too accelerate its economic potentials laws and regulators better be in place to prevent continued looting of the development capital that acceleration puts at risk from organized network chaos. Since 1991 this systems trap allowed organized network crime to loot the Nation's research and development pools. Lacking active regulation and law enforcement organized network crime in guilds and business clans will continue to loot our country; Intel Inside attractor, dot.com theft, Y2K artificial acceleration all leading to tech bubble, investment banking & financial collapse.

Intel targeting x86 horizontal competitors and indirect computer platform clusters raises recovery values. Industrial and nation's cost of Microsoft license tied to Intel processors including deadweight from inelastic producer surplus tied to microprocessor sales kick back, matched by Intel Combine and paid to Media Agents, including the Bill Ziff Davis Cartel, raises recovery values.

Intel Network channel fraud delivers market financial harms in excess of Madoff Financial Theft. Where those financial harms are 20 to 30 times greater then market damages associated with Arthur Daniels Midland agreements among horizontal competitors to rig the corn syrup market.

Making this Intel Network case of contract, horizontal combination and conspiracy to rig, allocate and conceal intent to monopolize x86 microprocessor and inter platform computer markets, obstruction in Docket 9288, essential for review, regulatory assessment, judicial remedies and oversight administration. Transparently documenting competition, rackets and espionage violations, implementing remedial solutions, methods of oversight administration, securing recovery for consumer harms, nations and society harm's, enterprise and individual harms. These are recovery values mandatory under Intel's DOJ antitrust compliance requirement for sustaining immunity from maximum antitrust and rackets damages. Requirements which Intel has a legal first mover responsibility over any first party actions despite all the 1st and 3rd party actions.

**U.S. District Attorneys, State AGs, U.S. Senate, Congress, FBI Director Mueller,
U. S. AG Holder, Vice President Biden**

As always this analyst urges Senate and Congress to consider law augments and new legislation to forever put in their place, to isolate, to contain, to prevent and remedy enterprise network organized crime infiltration including competition espionage. With the objective of being able to sense, register, error correct and remedy competition espionage occurring in real time and not over eighteen years time as in this case. To consider the types of harms caused by this sort of Enablement Monopoly engaged in product routing by Corporate + Media combination, from a very old play book, and to forever shut down such system games that have restrained and limited the organic potentials, democratic rights, legitimate methods of development and production capital accumulation for so many.

ACLU UPDATE - This includes addressing more then the decade long crime to negate this analyst's knowledge of competition, rackets and espionage violations by Intel Network. An obstruction of justice in Docket 9288 that continues as a Kafkaesque scheme that seems meant to disqualify this analyst's reporting & Clayton 4 witness status. Method includes Intel employees and agents misrepresenting evidence, creating findings, including from pointers and case proofs held by FTC, DOJ, FBI, and CIA. That is for the misprisonment of this analyst and negation of case proofs to conceal Intel Network crime, to white wash over discovery and conceal accomplices who maliciously framed this reporter and misrepresented the schemes white wash to regulatory and law enforcement agencies for over a decade. Over the entire period parallel forces act consciously operating in parallel with Intel Network interest to manipulate and push under this direct witness, Federal and State reporter.

As useful as this reporting role has been for attracting organized crime to decompose it, at thirteen years of investigation Section 5 pointers, indicators and proofs are sufficient for moving to hearing since this racket was first reported to FBI in 1996. In 1998 to FTC with antitrust violations recorded in real time, supply economics known and juxtaposed horizontal system structures identified before docket 9288 end.

I appreciate the government's confidence in my abilities to act as a lightning rod to catch detractors, investigate competition scenarios, deliver affirmative results, for qui tam stewardship and I won't let America down, but as I've previously shared its tough for any technical assistance, lay in the law, to lead in such a precedent setting racketeering case.

So providing guide, analysis, discovery, oversight is one matter. Leadership is another and that job has always been the responsibility of AG Ashcroft, Reno, Gonzales, FBI Director Mueller, CIA Directors Haden, Tenet, Gates, HLS Directors Ridge, Negropointe and continues to be the responsibility of AG Holder, FBI Director Mueller, CIA Director Panetta, other Federal & State representatives including the many U.S. District Attorneys.

Because Federal and some State agencies hold Intel Network discoveries that are affirmative proofs. Some of which Intel is now misrepresenting in Superior Courts to strip me of my properties, livelihood and reputation. And that needs too be resolved

**U.S. District Attorneys, State AGs, U.S. Senate, Congress, FBI Director Mueller,
U. S. AG Holder, Vice President Biden**

because this decade long hate crime of negation too misprision, blacklist, defame, misrepresent in full view of Federal and State government must also be remedied. I look forward to U.S. District Attorney inquires on qui tam to recover fraudulent and monopoly costs imposed on GSA Intel microprocessor based computer purchases. **Complaint and plan will be promptly forwarded to any U.S. District Attorney who requests them.**

Exhibit 2a: Intel Total Cost per Unit of Output:

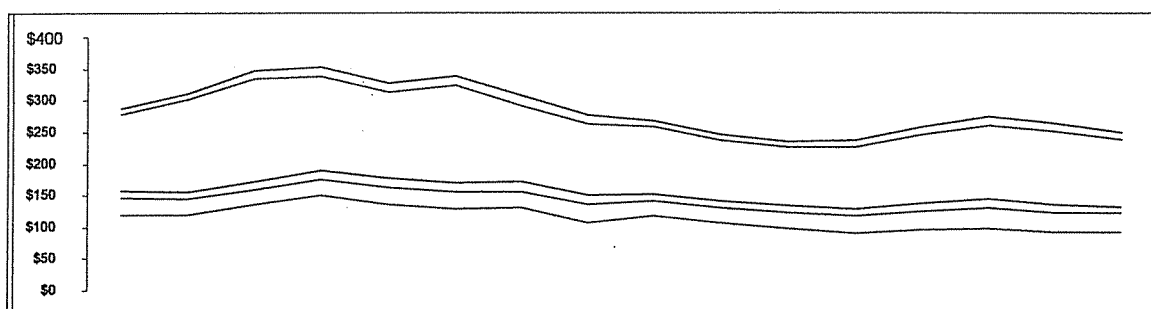
Intel Total Cost Analysis	1993	1994	1995	1996
Revenue	\$8,782,000,000	\$11,521,000,000	\$16,202,000,000	\$20,847,000,000
Gross Margin %	39.0	29.0	32.0	36.0
Net Margin %	26.1	19.9	22.0	24.7
Units of Output	33,680,000	44,700,000	54,870,000	70,790,000
100% of Total Revenue / Output	\$260.00	\$257.00	\$295.00	\$294.00
Cost PE&C<Dep / Unit of Output	\$118.65	\$120.07	\$136.16	\$150.67
Cost PE&C<Dep+R&D	\$147.45	\$144.92	\$159.78	\$176.21
Cost PE&C<Dep+R&D+Sales	\$157.10	\$155.06	\$171.70	\$189.97
PE&C<Dep+R&D+Sales+Mkting	\$278.68	\$302.04	\$335.72	\$338.47
PE&C<Dep+R&D+Sales+ilinside	\$288.33	\$312.17	\$347.64	\$352.22
Average Manufacturing Cost	21.25	26	40.5	49.5

	1997	1998	1999	2000
Revenue	25,070,000,000	26,273,000,000	29,389,000,000	33,726,000,000
Gross Margin %	39	32	33	31
Net Margin %	27.7	23.1	24.9	31.2
Units of Output	85,330,000	90,960,000	115,800,000	139,500,000
100% of Total Revenue / Output	\$293.00	\$288.00	\$253.00	\$241.00
Cost PE&C<Dep / Unit of Output	\$136.05	\$128.79	\$129.65	\$107.62
Cost PE&C<Dep+R&D	\$163.55	\$156.38	\$156.51	\$135.56
Cost PE&C<Dep+R&D+Sales	\$177.62	\$170.67	\$171.19	\$149.89
PE&C<Dep+R&D+Sales+Mkting	\$313.98	\$323.70	\$292.16	\$262.72
PE&C<Dep+R&D+Sales+ilinside	\$328.04	\$337.99	\$306.84	\$277.05
Average Manufacturing Cost	59.75	59.25	62.5	42.5

	2001	2002	2003	2004
Revenue	26,539,000,000	26,764,000,000	30,141,000,000	34,209,000,000
Gross Margin %	9.0	50.0	57.0	58.0
Net Margin %	4.9	11.6	18.7	22.0
Units of Output	154,300,000	167,500,000	170,000,000	175,000,000
100% of Total Revenue / Output	\$172.00	\$159.00	\$177.00	\$195.00
Cost PE&C<Dep / Unit of Output	\$117.44	\$106.56	\$98.01	\$90.10
Cost PE&C<Dep+R&D	\$142.04	\$130.63	\$123.65	\$117.41
Cost PE&C<Dep+R&D+Sales	\$152.41	\$140.78	\$133.65	\$127.69
PE&C<Dep+R&D+Sales+Mkting	\$258.38	\$236.89	\$225.56	\$226.67
PE&C<Dep+R&D+Sales+ilinside	\$268.75	\$247.04	\$235.56	\$236.96
Average Manufacturing Cost	45.25	tbd	tbd	tbd

	2005	2006	2007	2008
Revenue	\$38,826,000,000	\$35,382,000,000	\$38,334,000,000	\$37,586,000,000
Gross Margin %	59	51		
Net Margin %	22.3	14.3		
Units of Output	177,000,000	180,000,000	185,000,000	190,000,000
100% of Total Revenue / Output	\$219.00	\$196.00	\$207.00	\$197.00
Cost PE&C<Dep / Unit of Output	\$96.67	\$97.79	\$91.45	\$92.34
Cost PE&C<Dep+R&D	\$125.74	\$130.42	\$122.56	\$122.45
Cost PE&C<Dep+R&D+Sales	\$137.60	\$144.86	\$135.10	\$132.45
PE&C<Dep+R&D+Sales+Mkting	\$247.01	\$259.87	\$251.46	\$239.29
PE&C<Dep+R&D+Sales+ilinside	\$258.88	\$274.32	\$264.00	\$249.29
Average Manufacturing Cost	tbd	tbd	tbd	tbd

Exhibit 2b: Visual of Intel Total Cost per Unit of Output Analysis:



Key: Cost of PE&C < Dep + R&D + Sales + Marketing + Intel Inside 'Excess Burden'
 Cost of PE&C < Dep + R&D + Sales + Marketing
 Cost of PE&C < Dep + R&D + Sales
 Cost of PE&C < Dep + R&D
 Cost of PE&C < Dep / Units of Output

Exhibit 3: MDR Qty by Qtr, Intel Average 1K Piece Price, Analyst Economic Calc
Pentium III 500 MHz – 1.13 GHz; Commercial End of Run Production

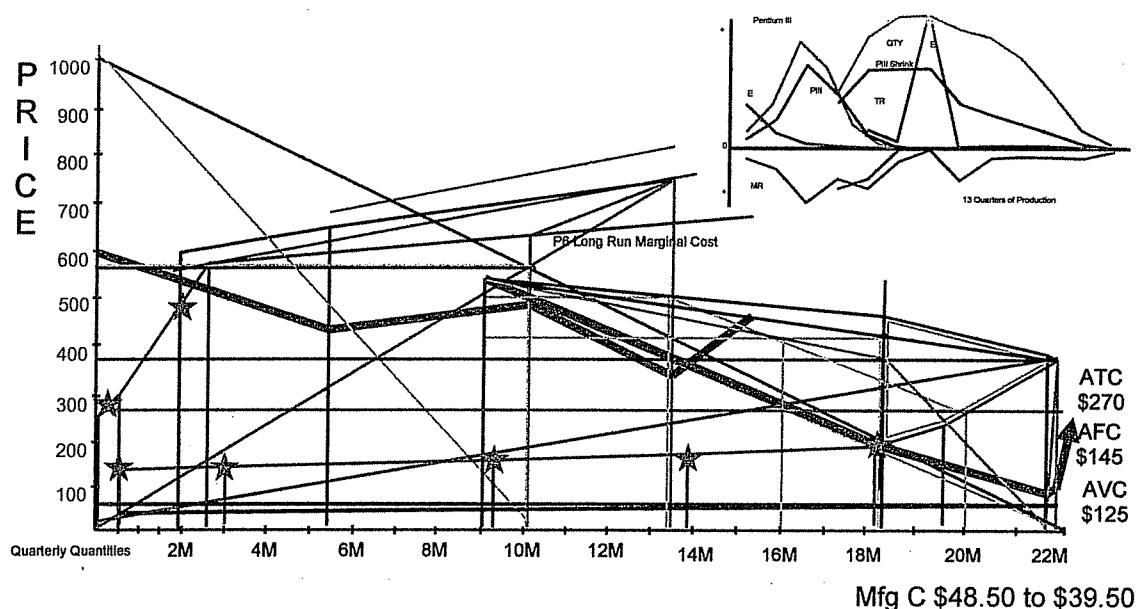
Period	qtr/yr	Price/Unit	▲Price	% ▲ \$	Qty per Period	% ▲ in Cum Qty	Period Revenue	▲Revenue	É
1	q4 99	\$530.56			9,044,000		\$4,798,384,640	\$4,798,384,640	
2	q1 00	\$457.22	\$73.34	13.82%	18,335,000	74.71%	\$8,383,128,700	\$3,584,744,060	14.67
3	q2 00	\$389.38	\$67.84	14.84%	21,648,000	79.07%	\$8,429,298,240	\$46,169,540	5.33
4	q3 00	\$387.78	\$1.60	0.41%	21,840,000	44.55%	\$8,469,115,200	\$39,816,960	108.4
5	q4 00	\$239.95	\$147.83	38.12%	19,615,000	27.68%	\$4,706,619,250	\$3,762,495,950	0.73
6	q1 01	\$194.43	\$45.52	18.97%	18,242,000	20.16%	\$3,546,792,060	\$1,159,827,190	1.06
7	q2 01	\$174.08	\$20.35	10.46%	14,907,000	13.71%	\$2,595,010,560	\$951,781,500	1.31
8	q3 01	\$165.95	\$8.13	4.67%	9,233,000	7.47%	\$1,532,216,350	\$1,062,794,210	1.6
9	q4 01	\$148.00	\$17.95	10.82%	2,998,000	2.26%	\$443,704,000	\$1,088,512,350	0.21
10	q1 02	\$143.00	\$5.00	3.38%	502,000	0.37%	\$71,786,000	\$371,918,000	0.11
	Weighted	\$315.16	Average \$		136,364,000		\$42,976,055,000	Mean	14.8

**U.S. District Attorneys, State AGs, U.S. Senate, Congress, FBI Director Mueller,
U.S. AG Holder, Vice President Biden**

Based on Intel financials this basic method for considering total cost per unit of production shows difference between Intel estimated manufacturing cost¹⁴, fixed cost including Plant, Equipment Construction < Depreciation + Research & Development. Followed by variable cost adders calculated to show their per unit production impact on the total cost of producing one Intel microprocessor. Note cost per microprocessor output calculated on total revenue added in revision 2 release. Some readers may prefer using 80% revenue per unit output taking into account some non microprocessor revenue. Given microprocessor and supporting component taper this analyst suggests total revenue divided by output ideal for considering Intel's cost of delivering a system solution.

Please compare this total cost per unit analysis with two prior exhibits that follow for considering cost price of desktop processors where end of run price is below average cost. Economic analysis in Exhibit 4 shows revenue maximizing monopolist setting PIII supply schedule as profit maximizing. First 'risk production' phase shows production set for maximum revenue and margin where periods three and four show \$16,898,413,440 in revenue secured on 43,448,000 units through artificial elasticity spike (\bar{E} period 3 = 5.3; \bar{E} period 4 = 108) meant to a) drain channel financial ability other then for banking Intel microprocessors; b) lure AMD into a higher price strata where AMD cannot compete on price alone. Difference between AMD Athlon® high price in period of \$853 verse Intel PIII price high of \$990 suggests \$137 in Intel margin values AMD is unable to match other then by offering a lower per unit price. Intel channel financial misappropriation periods three and four results in an excess cost burden on Intel specifically aimed for AMD's removal. Risk production phase ends through at least two periods of surplus production at below Intel's long run marginal cost. Here we find one production example of an Intel style one-two punch.

Exhibit 4: Analyst Economic Assessment – Intel as a Consolidator.



¹⁴ Micro Design Resources estimate

**U.S. District Attorneys, State AGs, U.S. Senate, Congress, FBI Director Mueller,
U. S. AG Holder, Vice President Biden**

Following the commercial production phase seen in diagram above shows small consumer welfare loss period 1, on top of two quarter's of profit, three quarters of clearing subject to wheeling and dealing for values, three periods of producer surplus below a competitive price and three periods of inelastic surplus at average fixed cost or less. Setting price and quantities at marginal revenue = marginal cost, marginal revenue equals price and supply equals marginal cost. The inset says it all; Intel is a massive surplus generator. This is deadweight to the entire industry. Deadweight including that which Microsoft also rides tied to Intel Inside kick backs paid to media cartels.

To Resolve District Judge Farnan Intel B.O. D. Futility Hurdle

Exhibits 6-9 attached in Rev 1 are marked Attorneys Eyes Only. Specific to District Judge Farnan futility hurdle its clear Intel Board of Directors knew of enterprise network competition, rackets violations, and from direct reference confidence man network engaged in competitive infiltration for competitor dismantling. Armed with this reference Intel and media agents attempted to crush all witnesses. U.S. District Attorneys, Senators and Congress members who are attorneys, may request Exhibits 6-9 by mail or contact their State Attorney General.

Lettered Relator Seeks Attorney; FCA, 31 U.S.C. 3279, recovery of monopoly and fraudulent cost imposed on Federal Government 'GSA' Intel based PC purchases.

Finally, based on this analyst's identification of Intel Inside as an illegal restraint 1993 through 1996, given first report of the Intel Inside racket to FBI in 1996, as a horizontal by vertical restraint for California Department of Justice in March 1999, this original source has been recognized by U.S. District Attorney letter as Relator for recovering monopoly and fraudulent costs imposed on Federal Government Services Administration Intel microprocessor based computer purchases from 1993 to date. Mr. Bruzzone is currently interviewing prospect attorneys for GSA recovery from Intel Combine under Federal False Claims Act. For case orientation write this analyst at address above or contact at campmkting@aol.com.

Respectfully Submitted,

**Mike Bruzzone, qui tam case steward
Relator Original Source since 1996
Technical Assistant to FTC since 1998
Department of Labor Code 3363.5**

March 11, 2009 *latest revision of August 25, 2009 for United States Attorney; recovery estimate now doubles*

To: National Association of Attorney Generals
United States Senate
Congressional Committees
American Civil Liberties Union Edition
FTC, DOJ, FBI, CIA, HLS & White House

Fm: Mike Bruzzone
Camp Marketing Consultancy
6025 McBryde Avenue
Richmond, CA 94805
Campmkting @ aol

Re: Intel Corporation Competition Case Assessment for National
Association of Attorney Generals and the U.S. Senate since 1999.

*- Call for U.S. Attorney to step forward for qui tam recovery of fraudulent costs
imposed on Federal GSA and State computer purchases.*

Intel Network Discounts, Rebates & Exclusions

*An enterprise network collusion to raise price, manipulate and direct the value of supply,
dump on competitors, harm consumers and countries manipulating rules of competition
to perpetuate a worldwide commercial fraud.*

The purpose of this commentary is to offer high vantage findings as a government technical source for remedy of Intel Corporation Networked monopoly. Findings that offer footing's for evolving a worldwide competition policy agreement based on the scope of this precedent setting case. Based on articles from the Utah and Wisconsin Law Review by Professors Robert L. Lande¹ and Howard P. Marvel², this Intel competition analyst³ will release civic findings from the Intel Network investigation. Findings offer pointers and proofs of anticompetitive effect fitting within the distinguished author's frameworks for confirming antitrust true positives.

This analyst's findings are from more than a decade spent investigating the Intel monopoly through a complete personal computer adoption cycle. Investigation occurred near real time as a working professional within the x86 microprocessor and personal computing industries and now as a leading analyst. Much of the analysis focuses on microprocessor & personal computer growth phases, 1991 through 2001, where competition espionage in an enterprise network corruption begins an industrial tragedy that is very near to domestic hearing stage.

¹ Robert H. Lande, Venable Professor of Law, University of Baltimore School of Law, Should Predatory Pricing Rules Immunize Exclusionary Discounts, Utah Law Review, Volume 2006, page 879, 2006

² Robert Lande & Howard Marvel, Professor of Economics & Law, Ohio State University The Three Types of Exclusion, Fixing Prices, Rivals and Rules, Wisconsin Law Review, Volume 2000, page 941, 2000

³ Mike Bruzzone, prior Cyrix, NexGen, AMD employee, IDT consultant, FTC civic servant in analyst capacity invited May 1998 & current, lettered to input by Assistant AG CDOJ, March 2000.

A technological political, and industrial social mishap, continuing forward that touches many level's of concern reflecting on paths and impact of technology, its use and misuse in our greater society. Where any fabricator manipulating the acceleration of potential's to deliver a network result, raises many in nation & inter nation trade, science, industrial management, legal and competition policy questions.

Lande & Marvel filter for FTC/DOJ Intel case movement to hearing stage:

Collective network action to mimic monopolist	Yes
Collective action to raise & stabilize product price	Yes
Collective action to pass search cost onto consumers	Yes
Collective action as broker dealers in agency	Yes
Collective action for movement to monopoly outcome	Yes
Collective action to diminish competitors & rivals	Yes
Collective action to diminish competitive output	Yes
Collective action to raise competitive cost	Yes
Collective action to reduce competitive revenue	Yes
Collective action to rig, fix, allocate monopoly potentials	Yes
Collective action that results in narrowing competition	Yes

In conjunction with extensive U.S. Federal Trade Commission and E.U. Competition Commission case investigation, plus South Korea and Japan FTC investigation of Intel, an open opportunity continues to grow for building awareness to cultivate understanding and move to dialogue for Intel overall remedies. For a renewed focus on regulatory diligence, timely error detection, a willingness to correct and for business improvement's supporting worldly values and open competitive structures. Nation and corporate action for supply frameworks that achieve sustainable level's of technical competitiveness, product manufacturing efficiencies for industrial social effectiveness. That is to help society and not to harm it. Not to help society as an after fact to conceal harms.

Intel investments in technical development and social responsibility today are necessary but cannot make up for two decades of a commercial network fraud. With this analyst's estimate of the racket fraud now exceeding \$21 billion based on Intel financials that when matched by microprocessor broker dealer tied chargeback doubling total consumer recovery at up to \$42 billion. Two other analyst estimates rival the Madoff investor theft. So a national tragedy that from a history of industrial political distraction's no one feels good about. But the basis for an industrial social reformation to be proud of when democratic minded people pull together to deliver for open competitive structures in which all business can be done and none rejected.

Now a federal case matter where three back to back Intel Boards of Director's concealed that enterprise being infiltrated in an industry being taken over by an organized crime network. A criminal case which transformed competitors into sales rackets to perpetuate the illusion of a competitive industry as early as 1992. Infiltrated by confidence men and transfer agents who could effectively compete within Intel Networked other than by joining in? Quite frankly there was little competition in the x86 compute platforms market

beyond microprocessor architectural design & platform definition. Engineering was not immune to espionage given a record of intellectual property theft. Competitive marketing & sales forces were effectively consumed within what quickly became a nationwide criminal microprocessor sales ring. A sales ring networked across Intel computer distribution channels establishing the industry playing field in which competition took place.

A criminal game covered up by some corporations, politicians, intelligence agencies, law enforcement, security operations & academic institutions too protect some and conceal others who are very close if not masterminds behind the planning and implementation of this worldwide commercial fraud. They include organized crime infiltrated into Cyrix Corporation, Advanced RISC Machines, NexGen, Advanced Micro Devices, Pinkerton Security, Intel Corporation, the Incident Management Group, Paragon Security, Stanford University, Integrated Device Technologies, the San Jose & San Francisco Offices of the Federal Bureau of Investigation, the California Department of Justice, Marin County, California DA office, local law enforcement and according too two reports of which one is a witness to the interrogation methods used, the Secret Service, plus a cadre of fixers including attorneys and specialists. From this mixture of entities it's time for the Department of Justice & Federal Bureau of Investigation to separate the legitimate casualties from the suspects and known criminals. It's time for judicial action remedies.

The case will show this country has been seriously infiltrated by organized crime manipulating it highest offices and agencies. When highest offices are only as good as some of the counsels they keep. And when constructions are perpetrated through misrepresentations to legitimate law enforcement designed too through them off the track of industrial spies & their relations in organized crime, who through two Presidential administrations, have been running some of the functions of this country from behind their corporate curtains. It's time for every American to get a lot smarter about what's really been going on in this country from the facts of this precedent setting case. And that's because citizen reference knowledge is the only way to assure that competition espionage to dismantle the county's industries can, from here on out, be detected in real time, not over sixteen years time.

Pulling Together for Open System Solutions

The aim of this orientation is exciting a coming together that supports an open system solution to organized crime infiltration. A total solution where legitimate governance, forthright management of their fiduciary responsibilities, *timely and willing correction* can enable competitive structures that support inter nation rules of play. Playing fields for legitimate business competition based on the well understood values of democratic capitalism. And not the values of an x86 microprocessor, personal computing, venture capital, investment banking and media organized crime network. For which there are many proofs.

Agreement on supporting forms of democratic capitalism that expand economic potentials organically, rather than those meant to build and contract a network franchise financially and systematically. To context switch because what's a network interface actually worth, cost competitively, in technical markets entering new business dimensions? Know

wonder concerns have risen around the kinds of earth quakes and mud slides only Intel can create.

Which means no more exclusions, discounts or rebates that restrain, no more enterprise network corruption, agreement to clean up the racket, to cease frivolous litigation, forego litigation traps and stalls, owe up to a history of lies, false statements and half truths, the mowing down of democratic descent, clandestine interrogation of suspects sedating and then shooting them full of barbiturates and in their own homes, attempts to condition and program and frame targets into submission, too set up victims as scapegoats, the buying of political favor meant to conceal Intel intent to monopolize and abuses so egregious, that Intel Corporation and myriad of fixers now face world wide condemnation from a history of worst case examples. Perhaps if these methods were used to protect countries other than Intel Networked they could be condoned at some level? Congressional hearing are one step to take to find out. Regardless remedies begin with knowledge reference.

Repeating conditions recorded over sixteen years in one of those extremely rare cases of a complex system failing to network correct constant manipulation of the rules of competition and Nations. Collusion intended to monopolize, raise and maintain Intel price, infiltrate, dismantle and depress competitors, assess a hidden media transport charge back on Intel computer end buyers, to rig, fix and allocate the personal computing market. Where the scope of Intel dealing examples and exclusionary supply methods offers a multi disciplinary springboard toward a full range of knowledge based solutions. Solutions for competition policy making that are much broader in scope than usually possible from a single criminal antitrust case. And that is because Intel Networked crosses so many of them.

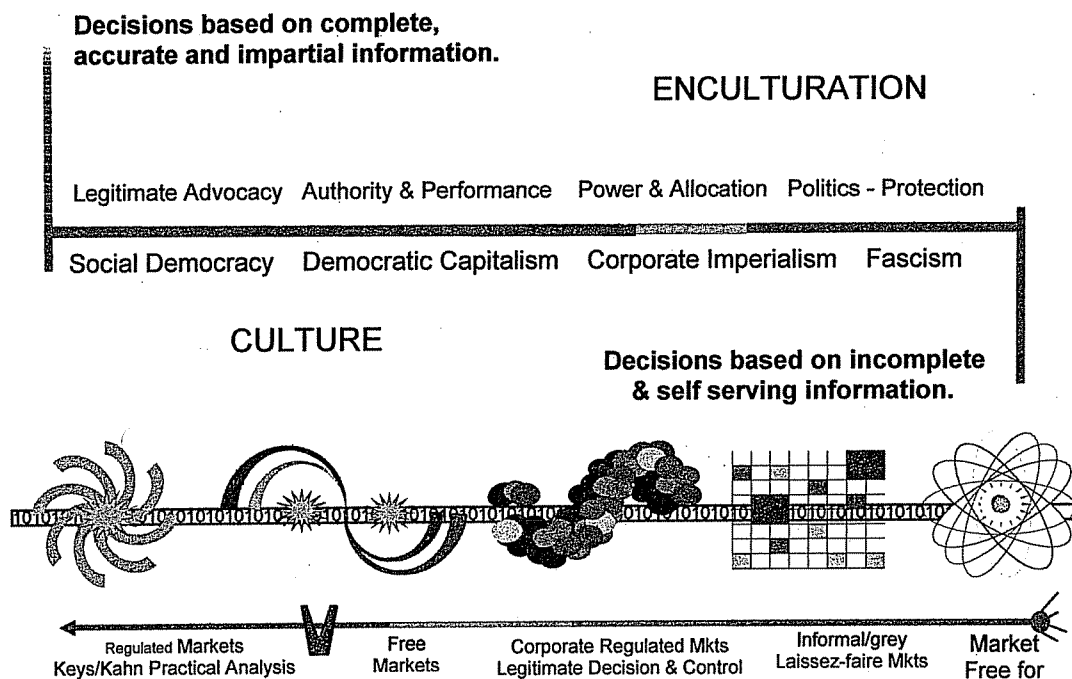
Offering our society a prime opportunity for modern antitrust understanding and enforcement in a networked technology world. Inter nation communication & resolution to questions rising from the broad complexities and modern sophistication of thoroughly recorded technologic political system failure. Failure that obliterated competition, limited consumer product choices, wiped out domestic industries resulting in employment loss, sacrificed the GDP of Nations and changed the rules of society to the rules of a criminal network.

There has never been anything quite as expansive as this Intel Networked system failure. Given the magnitude of its wave effects across the professional practice areas of its many co-conspirators; including those duped who should owe up to it. Because insider's who owe up to being duped are a critical necessity for fully defining remedies. Nothing could be as important as insiders ready willing and able to testify to the many known sources of democratic capital and industrial system malfunctions. To be courageous or too continue to be cowardice is a key question?

The outcome of this Intel case will forever change business and the world we live in. Because the case offers the most complete example of an industrial espionage social tragedy. In fact a green field for evolving constitutional, federal & state, competition, civil, labor and world human rights laws & legislation. Another Intel first, in a history of Intel firsts, that may become the greatest of all Intel legacies.

The social, economic and political degeneration associated with the growth of the Intel Power Complex was known and implications understood prior to 1979, subsequent growth and control over government and markets by the Intel Business Network. Where Intel technocrats, publishers, academia, analysts, politicians used their prior understanding of anticompetitive regimes to craft system's structures deployed by a constituent network to manipulate and deceive our society. Too persuade us differently. Too hide their truth of an industry racket. The painting of illusion invented by salesmen, marketers, engineers and system theorists to defuse what sociologists, historians, economists, political scientists and some members of the technical elite already knew was occurring. That network's can be a corrupting force *capable of planning to damage society*; morally, economically, politically, to steal for their own interests and to loot society in a subterfuge that presents only partial, misleading and alternate images of this reality.

Camp Marketing Consulting



Mike Bruzzone, Camp Marketing Consultancy, Campmkting@aol.com

Microprocessor Forum - 5/21/07

Network truths based on an invented reality. One sign of a malfunctioning system where scientific truths are met with white wash, construction and misrepresentations propagated by fixer's that can only fit within the craft works of their network's folk sense. A sense of being from a form of learning that does not correct, but can propagate positive images over realities that are false positives. False positives when understood as the actual reality they are present a much more fertile learning environment for designing and implementing system improvements. System structural improvements for in nation and inter nation competitive effectiveness. New law and law augments that are also Nation's laws.

This context switch from what was hidden to what is known offers an ideal environment for implementing Intel Networked remedies. From anyone who can add value. Including vantaged insider's who should have known better then to get caught up in their network system's time trap. The entrée to DOJ Amnesty Plus is closing. To be courageous or too continue to be cowardice remains a key question?

This context switch is to recover for nations, consumers, competitors, reversing harms & pursuing a positive forward path. And from the forward path a learning curve and the footings for constructive dialogue will catalyze for a competitive nation's framework. In one of those many instances when humanity needs too reflect on what happened in what was thought of as exemplar business structure to do something better. Because achieving a real Intel Networked situation assessment for law enforcement and regulatory agencies, was fraught with hurdles, artificially prolonged and extensively masked in a multipoint network manipulation.

Remove the mask to remedy Intel Networked and grow this knowledge as this basis for evolving global competition policies. A successive series of forward step's in a best practice example for rejuvenating modern antitrust regulation. Applying remedies to some sales and marketing system practices that are an affiliate network business racket. A racket that attracted and let in industrial spies too loot and dismantle and undermine Nations.

Conditional Discounts & Rebates are Exclusionary

Within an environment where enterprise and industrial networks reverse the obvious to manipulate the rules of competition, discounts and rebates come with costs. Customer incentives are meant to secure a result. One of the means available to a large fabricator to build interconnected system's within a structure for manipulating industry potentials.

One form of conditional discount known in electronics trade as quantity raising sales rewards, are traditionally associated with allocating surplus components to original equipment manufacturers based on a predetermined sales milestone. Milestones that may be predetermined near the end of that very quarter. Meet or reach a unit purchase objective and get another 10% for free. This analyst became aware of quantity raising sales rewards from Intel's 80486 sales practices in 1991. The practice originates from commodity component suppliers needing to release quasi inelastic product from inventories preparing for newly manufactured stocks caring a higher profit margin.

In their retroactive form quantity raising reward's press marketing responsibilities' and a cost of product sales onto system suppliers for production using a key component that can be approaching end of life. This is one risk associated with taking this form of following the milestone sales reward for a component near end of life. Primarily that the price for those microprocessor's rewarded is on the verge of collapse.

For components supplier and system producer the ability to move near end of life components was meant to spread the proliferation of computing technologies. In this example at bottom of the barrel price points, to the system suppliers established customers, and too expand the Intel microprocessor market to new customers outside the technologies premium price boundaries.

As the compute platforms market has matured, the practice of quantity raising sales rewards seems to have morphed to include premium product discounts where marginal revenue can be sacrificed by the component supplier now, for sustaining buyer loyalty into the future. Where product value's can be network directed sacrificing the component supplier's short run profits to stockholders today, in exchange for maintaining loyalties from a cadre of stakeholders into the future. The result is a production environment where quantities of premium product are increased and the price is moderated making these products accessible in higher volumes to more buyers. Which extends Intel microprocessor discount's and rebate's to more buyers who are computer system suppliers sooner rather than latter. In an environment where suppliers can also be broker dealer's within a first tier of Intel allocation that does not expand but contracts domestically and concentrates geographically. Obviously rewards filtered through broker dealers today for their leverage in cash flow value tomorrow can seriously interfere with actual price competition.

Within the realm of loyalty rebates these sorts of sales awards attached to Intel microprocessors, have what I've described as real and future time effects, that Professors Lande and Marvel describe as retrospective effects. We appear to agree that these effects can exclude competitors from sales channels in current and future periods. I suggest long run use focuses system supplier support costs onto the monopolist's components, excluding competitors, by attracting and consuming finite channel resource to bank goods tied from the monopolist's current and future product runs. This supply chain model is an affiliate system type. In this Intel case composed of an enabler, broker-dealers and sales agents.

Selling products with real and future time values gains Intel monopoly control of the customer sale for a premium product at introduction through its growth stage. And in the retroactive quantity raising example, near obsolete product toward end of production run. This dual advantage has encouraged Intel to price discriminate on the front end and to produce inefficiently on the back end to escape some the visible harms of inefficiency.

The practice combined with its sub system of conditions present substantial foreclosure effect's on horizontal competitors and vertical rivals. Foreclosure effect's which Intel Network has masked successfully through the many years this industrial economic debate was still a political confrontation. Confrontation that is an affirmative act of concealment by organized crime to obstruct the administration of justice beginning with DOJ vs. Intel in 1991, continuing in 1998 with FTC vs. Intel; Docket 9288. An obstruction achieved through a construction meant to misrepresent, white wash, frame and misprison those aware of the espionages taking place in real time against this and other countries.

Is that to cover up an economic espionage against the United States? Known by government, corporate, academic institutions, law enforcement, security organizations including witnesses, of one sort or another, in some of the highest office's in the land. The question is have core perpetrators been identified, both kinds of conspirators those who were duped and those who knowingly conspired. Finally, among the mass of law enforcement and security forces, separating those mislead by the core verses those who willing joined with the core to violate the constitutional, capital, commercial, civil & human rights of targets?

And is this all wrapped up? Have the perpetrators been placed under arrest based on the testimonies of those lower in the cover up including FBI & law enforcement. Legitimate law enforcement pissed off from being duped and dragged into this inter nation espionage by some among the technology elite and their political fixers? So who are the handlers? Who are the fixers?

I have no mercy for spies concealed behind their executive and political cloaks. For two decades the United States was severely infiltrated and economically crippled by these criminal forces including many who call themselves citizens. Potentially cloaked as respectable business professionals and public servants by noble act's meant to conceal true purposes? To turn a blind eye to the looting of this country economically by concentrating its business potentials, too wipe out its industries, to wipe out democratic capitalism, to destroy legitimate commerce, trade, competition and to take away the constitutional and civil rights of its citizens. Wasn't the cost of masking Intel Network crime too steep?

For a turn around their must be subpoenas, hearings, bookings, prosecutions and judgments that parallel commerce system structure, competition and multi lateral Nation's remedies. Consider it a war crime hearing because this was an economic attack against the country. Any politician who denies this looting should be arrested for white washing the American People. With 18 year record documenting an economic attack its time for Federal & State government to owe up to a history of techno financial and political lies. That technology is all good. When technology abuses including misrepresentations by technocrats, financiers and politicians that should have, or could have known better, has been very damaging. The only way to correct this situation is to recognize it for what it is; a technocracy and public administration break down. And will such recognition deliver a governance, democracy and competitive rebirth?

The Intel Rotary Engine

When, why and where Intel sacrifices premium product margin, extends production volumes, passes product values to broker dealers and agents, diffuses microprocessor dead-weight tied with a retrospective charge that sells many more PCs than its own volume are among this competition case matter(s) many topics. At a high level one could say Intel practices a form of price discrimination encouraging discounts based on production inefficiencies that block competitive entry. But it's what contained under this umbrella that's really interesting.

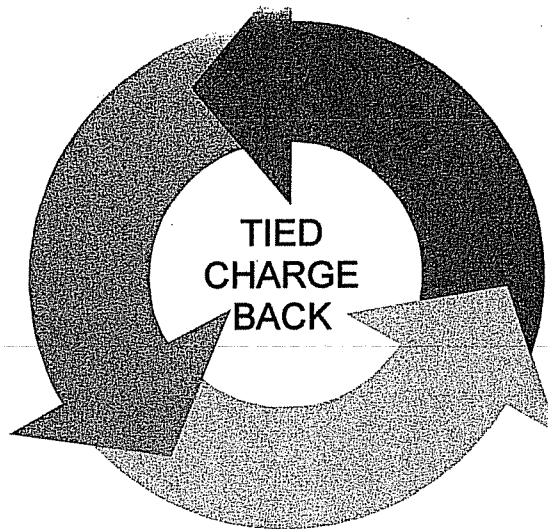
Product discounts and sales rewards are not the only methods Intel uses to limit competitors in current and future time. The Intel Inside rebate, a sales reward charged back to Intel by Media Agents, tied through and matched by Intel Microprocessors Dealers who are system sellers, ties three laterals of industry vertically and limits competitors in retrospect. Media gaining 100% of the value today of a rebated charge applied in future time is earned on the volume of Intel microprocessors purchased by computer system suppliers who are broker dealers in real time. A method where Intel does exchange microprocessor margin value today for gaining competitive mass and leverage by guaranteeing certain stakeholders future cash flows from rebates applied now but cashed in well into the future.

The Intel Inside rebate is a sales reward tied and matched through broker dealers charged back to Intel Network by Media Agents. The tie attaches three laterals of industry vertically and limits competitors retrospectively. The media earning 100% of the value of the rebated charge back in future time is earned on the volume filter of Intel microprocessors purchased by computer system suppliers who are Intel broker dealers in real time. The filter sorts for future values in a stream of real time values. Values are discounts and rebates attached to each Intel microprocessor based on their price margin from high to low.

In a disproportional sales environment where Intel produces many more microprocessors than system suppliers produce computers, added weight of Intel microprocessors massed and tied as a retrospective reward through broker dealers in real time, drives Intel microprocessor dealer's computer system sales and network revenues through media agents in current and future time. This real time future time effect is an exponential multiplier for Intel microprocessor brokers who are computer system dealers and their sales agent's operating in the media. In this instance where some computer companies and the media merged too perpetuate a Nation's crime. Any media who accepted Intel Inside rebates from these companies is an accomplice regardless of knowledge, association or agency.

Microprocessor production mass in excess of computer demand delivers a system which is the Intel microprocessor Dealer computer sales rotary engine. The engine derives energy from the mass of Intel microprocessor rebate values based on price margin and volume. The more values Intel produces in excess of computer demand the longer the engine will run. In this reciprocating system inertial volumes of premium priced microprocessors receive a higher level of bundled discount, including rebate value applied as charge back for media to capture. Intel system seller's who capture the majority of premium microprocessor discount values including rebates for media charge back from Intel, *are automatically guaranteed to sell more computers in future periods*. That outcome is based on the added margin value of the microprocessors in current period and the growing unit value of microprocessor charge backs from current to future periods. With computer sales volumes lagging microprocessor volumes the charge back tends to build up, which tends to drive up Intel Dealer computer sales over successive periods from media catching up on crediting back-in-time charges.

Microprocessor
Supply Charge
in Excess
of PC Demand.



Charged Back

Charge Match

Charge backs are only released to media from Intel and broker dealers if media sells a computer. And continues too sell through Intel microprocessors riding in computers representing surplus charge backs from broker dealers to consumers out into future. In this sales circle which is the rotary engine media sells Intel PCs through forms of sales journalism including shady product reviews, rigged benchmarks, Editor's Choice Awards and subjective Star rating systems ***** tied to volume of Intel charge back values. Design a work around to beat this system based on organic market best practices and Intel Network will eliminate you. That is the Cyrix, NexGen, AMD or IDT program and its competitive program manager.

Charge backs held in system supplier transport pools are secured from microprocessor overage greater than supplier computer demand. Stripping fees accrued from overage creates the pooled weight that attracts media by tying the charge back, not to the Intel microprocessor, but to the Intel microprocessor Dealer's computer brand models. The higher the microprocessor charge back value the greater media will work at releasing this sales reward by selling that class of supplier computer model known to carry the highest value charge back. And regardless of whether any specific computer contains the Intel microprocessor rebate from which the charge back was massed. That is because frequently, any specific computer's microprocessor transport charge was in fact skimmed from another Intel microprocessor, purchased by that computer dealer bought as overage for the guarantee of the future reward, promptly resold to another microprocessor broker or PC system integrator sans the reward.

When the system supplier secures microprocessor charge backs at greater than a 1:1 ratio with out going computer sales, their transport pools grow and media will begin to force out those values by selling more of that Intel microprocessor dealer's computer models. Obviously pushing specific dealer computers models through channels to end customers for collecting microprocessor charge back is not a natural PC system demand driver. This practice tends to exclude competitors and displace rivals who are outside pure play Intel

microprocessor broker dealer and agent networks. A network for banking Intel microprocessors, collecting charge backs, paying routing fees and servicing the transport of Intel microprocessors sold in computers routed in inter nation trade and inter state commerce.

Noteworthy not all media commission fees massed from anyone Intel microprocessor production run pass through with computer brand model sales associated with any one production run. A lag effect occurs as media clears fee pools secured from microprocessors purchased in excess of anyone Computer Dealer's end system sales.

As an example microprocessor fees stripped from Pentium Classic overage in excess of associated dealer Pentium Classic computer sales will not be cleared by media until their Pentium II sales push. This push now focuses media on that same PC Dealer's Pentium II brand models based on a total rebate value from prior products. This is one of Intel net's most prominent competitor foreclosure methods. And in the opinion of this analyst leads social welfare loss from monopoly pricing, cost of dumping deadweight, selling below cost and predatory pricing at product transitions in consumer recovery values and ability to foreclose on competition through successive production short runs over the long run.

So system suppliers tend to over buy microprocessors from Intel. And Intel tends to manufacture more microprocessors than is efficient for the value of discounts and rebates attached to them. With Intel supplying microprocessors to computer system suppliers in excess of real time computer system sales the limiting effect of the tied charge back forms well out into the future. No competitor lacking Intel's scale economies built over successive monopoly short runs can compete effectively with this form of retrospective rebate. The current and future effect's displace competitive margin value, warps competitive revenue space, distorts competitive product introduction times and destroys democratic capitalism.

The power of Intel to fix the price of the product which it manufacturers with a tied charge back, which broker dealers and agents scramble to benefit from, and to whom all have been and are actual or potential competitors is a powerful inducement to abandon competition. Active and vigorous competition then tends to be impaired, not from any preference of the end buyer for an Intel microprocessor based computer, but from the preference of Intel broker dealers and agents to accrue the benefits of a tied rebate matched by that broker dealer, and charged back to Intel, for payment to media agents on every future computer sale.

A dealer's game where the network that abandons competition has an advantage over any that maintains it. Where player's who refuse to abandon competition are forced out of this game and out of the business of Intel microprocessor brokerage. Abandon microprocessor brokerage and the potential for surviving dealership within the Intel intra platform personal computer business, the network franchise, is greatly diminished.

Consumer rebates managed as a charge back traditionally place a transport tax of approximately 3% to 6% of the cost of the Intel microprocessor embedded into the end buyer's computer price. Half that percentage is credited by Intel as a cost on the microprocessor sold to broker dealers. The other half is a cost of advertising by broker dealers to match that Intel tie for pass through acceptance as a fee taken by media agents. Together the tied

costs raise the price of computers to end buyers by the value of the charge back to Intel through dealers agreed on as a search fee by media agents. So while Intel Network takes responsibility for making consumer search focused and easy, they also charge consumers for that focused search ability. To search out and sell Intel Network intra platform computer brand models primarily. All driven by the weight of surplus microprocessor margin values emanating from Intel.

That consumer recovery value over sixteen years is around \$21 billion according to Intel financials. In a business choice where Intel and its directly allocated microprocessor dealers raise their computer search costs, in combination, to pay media in agency to abandon competition based on an assured reward. A future reward meant to focus media on selling computers to end buyers through Intel Networked product preview to diminish charged stocks now and well out into the future. Because for the rotary engine to work, media must sell broker dealer computer systems at a sell through rate in excess of broker dealer real time Intel microprocessor purchases or microprocessors will back up in Intel supply system. When processors back up in the supply system their prices can crack and values to media reduced. So before that can happen media tends to push more of them onto consumers in shorter bursts. Because media's commission fee for routing Intel microprocessors across State lines inside computers is greater on higher valued Intel microprocessors.

This analyst estimates between one quarter and one half of the charged transport fee; \$5 billion to \$ 11 billion is recoverable for consumers worldwide given the schemes metric. The metric is based on Intel microprocessor & personal computer shipment data. This analyst has requested the Federal Trade Commission to research for co validating the metric for determining consumer recovery from this tying system. The metric is easily determined breaking out broker dealer real time computer sales from microprocessors stripped for their rebate values and resold to others lacking the charge. Noteworthy, regardless of this reduction metric, the FTC may find the entire Intel Inside program illegal given methods of juxtaposing dealing combinations passing through tied charge backs based on agreed upon commission fee schedule. Either way the Intel Inside rebate program has for some time been in violation of Sherman Act Section 1 and Section 2; contract, combination and conspiracy to restrain competition intended to monopolize the market for general purpose microprocessors and computers. The Intel conspiracy is responsible for destroying entire industries by prematurely forcing domestic semiconductor, microprocessor and computer industry concentration that drove these industries out of country by passing much of their values to foreign entities ahead of natural time. That is in an unnaturally short system time based on Intel pursuit of Moore's Objective; to monopolize the markets for general purpose microprocessor and computers before Intel's charter x86 patent portfolio expired.

The Intel Sell-through System

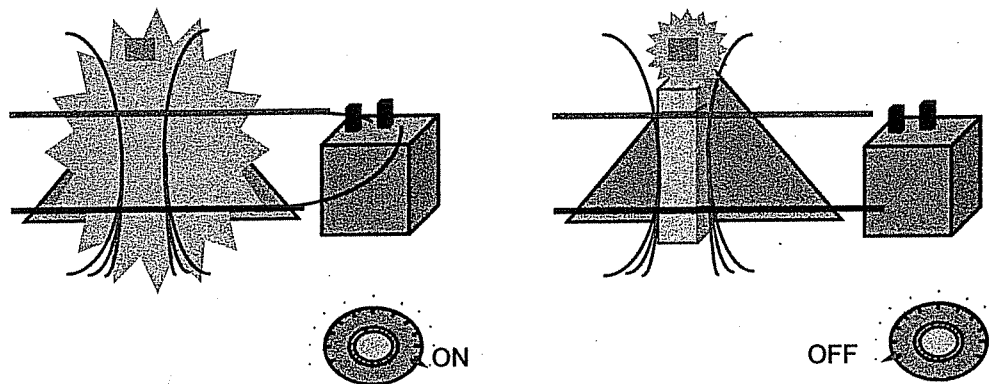
To create this microprocessor sell through system Intel separates strong from weak market system suppliers directing new microprocessors with greater price elasticity to volume movers. Initial system sales gain their differential margin from higher discounts and rebate premiums. With the introduction of newest Intel microprocessors combined with some media hyped computer reviews the rotary sales engine is primed. With some overage from Intel allocated dealers released into brokerage the engine starts its course

through another Intel commercial cycle. A cycle distinguished by several short runs of production through any one microprocessor's architectural product life. That is a combination of microprocessor & system design knowledge evolution and micro lithography process and fabrication capabilities and improvements; including acceleration of system time.

Under this scenario and in order to compete with other strong system supplier's procurement will take advantage of Intel discounts that increase system margin including value of Intel rebates for media charge back. However that time is limited as the value of volume discounts at premium price is finite. If one supplier does not take the discounts associated with Intel premium product another will. Don't take product associated with the highest discount values, in a leave it or take it deal, and that company is slowly forced out of the business. Because what separates Intel Network system winners from losers has always been their ability to capture the marginal value of discounts, which include a tying charge back, collected by media on the weight of microprocessor supply not on the mass market of computer system demand.

Camp Marketing Consulting

Turn Intel rebates on & Network Dealers configure around Intel.



Turn Intel rebates off & industry can reconfigure around open market sources & open market values.

Mike Bruzzone, Camp Marketing Consultancy, Campmkting@aol.com

11/99

Noteworthy the extent of the effect horizontally at Dealer and Media laterals is determined by the volume of the charge. The greater the unit volume the broader the values and horizontally combining effects which are capable of creating a bridge monopoly consisting of horizontal dealer broker entry points tied to horizontal media agent exit points. The bridge is specifically used for barricading and accelerating the sales of Intel microprocessors down network channels. Network product preview and computer sales to end market buyers that support broker dealers who represent the largest of the charge back transport pools.

As an electronic component company Intel is incredibly proficient at designing and building high bandwidth bridges. This commercial pipeline bottleneck example excludes many competitors and is illegal under fair trade and commerce law.

This kind of rebate charged back to Intel Dealers by media agents as a Network marketing device can be used to force through, and throttle specific Intel Dealer product down channels, suppressing and stalling competing and non-infringing products. And is entirely driven by the volume of Intel microprocessors, their reward values to Dealers, weighting effect of supply and media's ability to get consumers too buy that supply routed from pools transported in network computer offerings out into future time. More volume passed through more dealers broadens the matrix monopoly routing effect. Growing volume through fewer dealers concentrates & barricades the matrix monopoly routing effect.

The government can then contend that defendants have combined to fix Intel intra platform computer prices including a hidden charge back paid by Intel, tied and matched by Intel Microprocessor broker dealers who are Intel's primary system suppliers, for collection as a search fee by Media in agency with the Intel Network. This activity constitutes a violation of the Sherman Act and irrespective of whether it is reasonable or laudable to charge microprocessors with a weighted rebate for pass through, the fixing of media sales commissions on microprocessor volume price is a per se illegal practice and constitutes a violation of the Sherman Act.

Intel promising a sales reward on which media plans its future cash flows, based on broker dealers scrambling to purchase majority volume of Intel microprocessors charged with the tie today, credited against an Intel microprocessor riding in a PC chassis end sale, released by media computer sales on the value of the tie tomorrow; a week, a month, a quarter, or one year from now excludes competitive products and natural values from commercial channels of distribution. And that is because Intel Network assures transport pools are loaded to pay channels for selling Intel potentials based on a known production plan, for a retrospective sales reward, that guarantees predetermined levels of future cash flows. The power of this kind of juxtaposed combination tied with a matched charge back, with or without retrospective effects, and whether or not proven paid as an added cost by end buyers in their computer system sales price, inflicts the kind of public injury which the Sherman Act condemns rendering these Intel Network practices on all counts illegal per se.

The faster media sells Intel microprocessors, the faster media collects its reward which prejudices the values of competing products. The faster Intel Networked refills transport pools the longer Intel Networked keeps media focused on selling Intel potentials over all others. In any other industry, automotive for example, would a major competitor focus supply to depress competitor product margin and utility value other than through organic methods of competition? Would a car publication?

That answer is no because automotive publications want as many manufacturers as possible too support their publications with as much advertising as possible. However in the computer industry where channels are beholden to Intel for margin rewards, Dealers pass through and match a tied charge back for payment by Intel to media. And that's why an AMD, Cyrix, National, IDT or VIA product that provides 90% of the performance of an

Intel microprocessor for 20 to 30 percent less price is rejected by Intel Networked. They don't like that value proposition. And a maintain history of excluding competitive substitutes and replacements that impact or threaten their Intel Network derived margin values.

That's why one leading personal computer company in Texas *did not* want to be an Intel microprocessor dealer. And one leading computer company in Texas *did* want to be an Intel microprocessor dealer. And why Ziff Davis Publishing Company sales representatives rolled out the Intel Inside program to computer OEMs in that State in 1992. Where some of us at Cyrix caught them; industrial spies operating from within personal computing media to perpetuate a nationwide, and what has become a worldwide Intel microprocessor computer industry commercial fraud. Through the techno economic and political bullshit that has encompassed this Intel matter it took only a matter of time to catch them. And that's why their needs to be techno economic and political system remedies as well as competition remedies. In order to detect and remedy competition espionage occurring in real time and not over sixteen years time.

In the x86 microprocessor and Intel intra platform computer markets where loyalties can be fleeting, and can be driven by the demands of the one, or the combined, no form or Intel discount, reward or rebate is legal. That is because all sales incentives, including retrospective forms, support a network franchise to exclude competitors in real time and in future time. A fact assured by Intel's share dominance combined with abuse of market power. Where all forms of quantity raising rewards, those occurring at the beginning or end of a product's production run, or those meant to force and accelerate the transport of Intel product through sales channels, are meant to preclude competitive sales in a market controlled by Intel Networked. Where Intel Inside rebates accrued for Media today, and charged back through customers for payment by Intel next quarter, achieves the same competitive result. Exclusion that maintains the Intel Networked monopoly from one Intel microprocessor production run to the next. Intent to monopolize that has been proven systematically, and economically, relying on the Ninth Circuit filter for showing short run exclusions. Let's review some of those exclusions.

Analysis of Pentium Classic Desktop Microprocessor Production

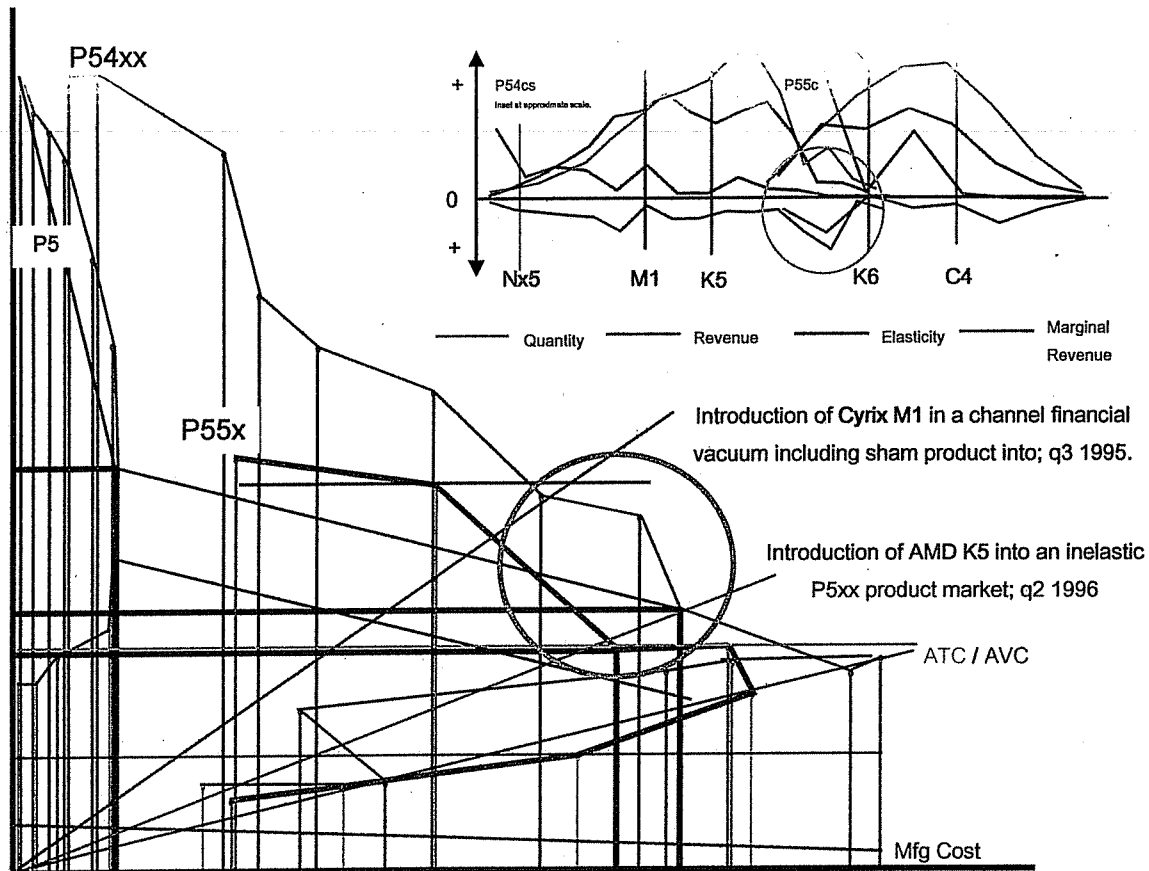
If this Pentium desktop production run from the second quarter of 1993 through the third quarter of 1998 looks anticompetitive; it is. How could any competitor survive this marginal revenue environment? Even if the competitor was an efficient supplier how could that enterprise survive trapped within the economic chaos of an Intel production deluge? A deluge of product between Pentium with MMX technology (P55x) overlapped onto Pentium Classic (P54xx) and were both necessary? With two quasi inelastic and three inelastic quarters of production why wasn't Pentium Classic ramped down five quarter's earlier? Why the cresting wave form? Why the trough? Why the over lapping Intel revenue and margin takes? Meant to extinguish a decade of replacement platform innovation built on microprocessor substitutes?

In this intent to monopolize case proof for the CDOJ and FTC first reported in February 2000, find examples of Intel price drop on Cyrix M1, Intel increased production at AMD K5 which is also 486 harvesting stage. Note Intel Pentium with MMX (P55x) price at or below average variable cost at end of run, while corporate customers still pay a premium

Pentium Classic (P54xx) price on obsolete product lacking MMX extensions. Note price discrimination zone. Note lack of an oligopoly welfare space. You can see Intel's plan to crush Cyrix, AMD and National between the supply schedules of these two components.

Behold the elusive Intel Roller Coaster -

Intel Pentium P5, P54cs & P55c Marginal Revenue; q2 1993 to q3 1998



Note: Three Intel short runs are shown; P5, P54xx, P55x. Intel quarterly microprocessor shipments displayed horizontally showing from left to right; quantities building through a monopoly competitive equilibrium; then right to left showing quantities decline to end of life; both @ Intel 1,000 piece published sales price indicated vertically for any particular quarter. Quantities are Gwennap MDR estimates. Price is Intel stated. Economic analysis by Bruzzone.

One open question is sham product. At end of run was that sham product Pentium Classic or Pentium with MMX Technology? For Pentium Classic at end of run the technology had reached its performance limits and the highest frequency offerings did not offer proportional increases in applications performance for their price. For Pentium with MMX were there MMX enabled applications in the period and if so how many?

MMX third party application's growth arrives in parallel with the introduction of Intel Pentium II and ramps with Pentium II shrink. So the question is how many MMX enabled applications were able to run on Pentium with MMX technology in its P55x implementation? Subsequently was P55x necessary? Finally given the applications base, or not, was Pentium with MMX Technology a consumer marketing sham?

Also consider the weight of the Intel Inside rebate charged back to Pentium Classic, and Pentium with MMX Technology, at end of P5xx production run. Noteworthy Intel Inside accruals; the charge back waiting to be secured by media, won't be secured through the sales of Dealer Pentium brand models. Awaiting charges will be secured by media selling Dealer's upcoming Pentium II brand models, introduced in the second quarter 1997.

This offers a perfect example of how a retrospective Pentium charge back used for future cash flow planning by media, credited to Intel as a microprocessor rebate tied and matched by broker dealers, is used to exclude competitors in Pentium real time for an Intel monopoly advantage in Pentium II future time.

Consider also the record of evidence of the close relationship between the large expenditures for national advertising on personal computers and the resulting volumes of sales. Advertising is not here criticized as a business expense. Advertising may benefit indirectly the entire industry, including the competitors of the advertiser. However such tremendous advertising power is also a widely published warning that these companies possess and know how to use a powerful offensive and defensive weapon against competition.

For Intel Networked those advantages are production mass, surplus energy and communications control achieved by tying a matched charge back through broker dealers and media agents, to Intel production based on price and volume, for assuring real & future time cash flow gains. Alternatively lacking the rebate charge back would Intel have been able to move P5xx production deadweight in real time? Would production efficiency have precluded Intel from producing that volume of inelastic surplus? Quasi and inelastic unit volumes across five quarters that are approximately 36% of Intel's combined P54xx and P55x runs which equal 51.484 million units.

Across nineteen quarters representing P54xx and P55x production runs, 50 million Intel units represents approximately $\frac{1}{2}$ of the combined capacity of AMD and Cyrix. Economically from an industrial management perspective, it's not hard to see the other 50 million Intel units that crushed Cyrix, NexGen, AMD, National and IDT from the combined volumes of these two Intel short runs totaling 190.351 million units.

In Summary

This transfer of value act was central to Intel Network's market allocation scheme misappropriating competitor sales revenues while whittling down their horizontal combination to its key Dealing agents. There is little that is natural about how x86 computer company market shares played out between 1993 and 2006. Before 2006 market share winners are primarily defined by Intel Network structure. That is gaming of structure by corporate + media combinations.

In light of natural end market demanders for Intel's well regarded microprocessors no charge back transport fee was required for these products to naturally find their way into consumer end computer sales. Untying fees from Intel deadweight brings into balance Intel allocative and productive efficiency maximizing total economic welfare. Doing so would have preserved the domestic microprocessor and computing industry welfare

spaces for competition on the merits in the interest of Nation, society, consumers and democratic capitalism.

Some have said the retrospective character that makes Intel discounts and rebates anti competitive suffers from no settled language that is universally understood from more benign discounts that are pro competitive. At this juncture I hope to have overcome that viewpoint. Because to identify how Intel's discounts and rebates are illegal; first dollar, quantity raising, loyalty, kick back, charge back, off-the-books and tied can be assessed through the languages of multiple disciplines. Those are the language of law seen through legal case precedence, economics and industrial management as shown here, cybernetics, network psychology, communication science and from what scientists, engineers, economists, sociologists, psychologists and philosophers consider example's of responsible science in technocracy.

Within these known frameworks Intel Network system's structure can be decomposed into the mechanics of their individually integrated workings. And subsequently reveals the broad expanse of Intel Network anti competitive practices. Practical system's knowledge and reference that offer's a real foundation for Intel Network remedies. A modern antitrust foundation for evolving a world wide competition policy agreement from these foremost example's of an intelligent alternative for worldly decision making. A real alternative for Nation's competition policy decision making that is a leap ahead in understanding Intel Networked.

Respectfully Submitted
Camp Marketing Consultancy

Mike Bruzzone
Managing Director

Rev 2.1

October 15, 2008;

To: FTC Commissioners
Members of the United States Senate, Congressional Committees
cc: National Association of Attorney Generals, Federal Trade Commission

Fm: Mike Bruzzone
6000 Park Avenue
Richmond, California, USA 94805
Campmktg@aol

Re: Math Correction; State Recoverable Intel Inside fee per computer is \$12.25*
Frameworks & filters supporting Intel Corp. case movement to hearing stage.

Members United States Senate, Congressional Committees:

This correspondence is to notify both the U.S. Senate and Congressional Committees of a math error I made this last May calculating the Intel Inside fee recoverable for consumers. Due to the transposition of a single decimal place my thesis public summary placed the Intel Inside accrual for Intel x86 microprocessor based intra platform desktop computers at \$0.70 to \$0.97 each. Note that amount is *not correct*. Correct amounts are displayed below and between 1993 and 2007 average \$12.25 per Intel microprocessor (MPU) routed by and between Intel contractually enabled horizontal dealing combinations in both inter state commerce and inter nation trade

Intel Inside Rebated-Fee Accruals

<u>Year</u>	<u>Annual Coop \$</u>	<u>▲ Coop Yr /Yr</u>	<u>% ▲ Coop</u>	<u>Annual Sales Rev</u>	<u>Coop % Rev</u>	<u>MPU Shipments Yr</u>	<u>\$Coop/MPU</u>
1993	\$325,000,000			\$8,872,000,000	0.0366	33,680,000	\$9.65
1994	\$459,000,000	\$134,000,000	29.19%	\$11,521,000,000	0.0398	44,700,000	\$10.27
1995	\$654,000,000	\$195,000,000	29.82%	\$16,202,000,000	0.0404	54,870,000	\$11.92
1996	\$974,000,000	\$320,000,000	32.85%	\$20,847,000,000	0.0467	70,790,000	\$13.76
1997	\$1,200,000,000	\$226,000,000	18.83%	\$25,070,000,000	0.0479	85,330,000	\$14.06
1998	\$1,300,000,000	\$100,000,000	7.69%	\$26,273,000,000	0.0495	90,960,000	\$14.29
1999	\$1,700,000,000	\$400,000,000	23.53%	\$29,389,000,000	0.0578	115,800,000	\$14.68
2000	\$2,000,000,000	\$300,000,000	15.00%	\$33,726,000,000	0.0593	139,500,000	\$14.34
2001	\$1,600,000,000	-\$400,000,000	-25.00%	\$26,539,000,000	0.0603	154,300,000	\$10.37
2002	\$1,700,000,000	\$100,000,000	5.88%	\$26,784,000,000	0.0635	167,500,000	\$10.15
2003	\$1,800,000,000	\$100,000,000	5.56%	\$30,141,000,000	0.0597	170,000,000	\$10.59
2004	\$2,100,000,000	\$300,000,000	14.29%	\$34,209,000,000	0.0614	175,000,000	\$12.00
2005	\$2,600,000,000	\$500,000,000	19.23%	\$38,826,000,000	0.0670	177,000,000	\$14.69
2006	\$2,300,000,000	-\$300,000,000	-13.04%	\$35,382,000,000	0.0650	180,000,000	\$12.78
2007	\$1,900,000,000	-\$400,000,000	-21.05%	\$38,300,000,000	0.0496	185,000,000	\$10.27
2008						190,000,000	
2009							
Total	\$22,612,000,000			\$402,061,000,000	0.0536	2,034,430,000	\$12.25
					Average		Average

Note intent to monopolize as percentage increase peaking 2005 - 2006.

* Adds 2007 Annual Coop to original October 2, 2008 NAAG submission

Estimation for State wide consumer recovery multiplies \$12.25 for each Intel microprocessor sold within a computers central processing unit, within your State, beginning 1993 through to today. To estimate a maximum recovery divide by 2, or one half of all systems sold within your State. To estimate a minimum recovery divide by 4, or $\frac{1}{4}$ of all systems sold within your State. To refine State recovery utilize the Intel annual rebated-fee accruals table located above.

This method establishes a consumer recovery range for the Intel Inside transport fee tied to a single Intel microprocessor embedded into the consumer sales price of a single computer's central processing unit (CPU). One microprocessor per CPU equals \$12.25; two microprocessors per CPU is \$24.50; four microprocessors per CPU = \$49.00 and so on. Note that this division should really account for the number of Intel x86 microprocessors (MPU) sold in your State, as some Intel computers contain more than one MPU per CPU. Simple division by the number of Intel based computers (CPU) sold within your State, regardless of the number of Intel microprocessors (MPU) they contain, is meant to simplify the consumer recovery estimation.

This Intel Inside commission fee pays PC and other media to sell specific Intel Dealer PC brand models that are tied to the majority of Intel's commercial microprocessor transport fund. This fund is accrued by Intel intra platform Computer Dealers purchasing Intel x86 microprocessors in excess of their associated computer brand model's end user sales demand; solely to strip & mass the transport incentive. Stripping fees accrued from overage creates the weighted attractor which both ties and enlists the media to sell specific Intel Dealer computer brand models, from which the majority of the transport fund was obtained, regardless of whether or not any specific computer contains the Intel microprocessor rebate from which the fee was massed. That is because, frequently, any specific computer's microprocessor transport charge was in fact skimmed from another Intel microprocessor purchased by that computer Dealer as overage and resold to another microprocessor broker or PC system integrator sans the fee. This act of Intel intra platform PC Dealers over purchasing to mass the media transport incentive from the total available funds from anyone Intel microprocessor production run is meant to artificially weight and build Dealer transport pools, administered and paid out by Intel, between Intel Computer Dealers tied and routed through their Media Sales Channel counterparts. In this three step distribution structure juxtaposing dealing combinations, Intel Computer Dealers represent a bridge channel entry point and Intel Media Sales outlets represent the channel exit point.

Not all media commission fees massed from anyone Intel microprocessor production run pass through with computer brand model sales associated with that MPU production run. A lag effect occurs as media clears fee pools secured in excess of anyone Computer Dealer's end system sales. As an example microprocessor fees stripped from Pentium III overage in excess of associated dealer PIII computer sales may not be cleared by media until their Pentium 4 sales push, which now focuses on that same PC Dealer's Pentium 4 brand models based on the effect from prior products. This lag effect is continuous across Pentium, Pentium II, Pentium III, Pentium 4, Core Duo; & Quad Core system sales? That is

why the Intel Inside scheme limits computers containing competitive microprocessors; substitutes & replacements in real time and in future time. Whether AMD, NexGen, Cyrix, National, IDT/Centaur, Rise, Transmeta, VIA, and in x86 Windows platform replacement market DEC, MIPS, Motorola, and in the enterprise replacement platform markets Sun, IBM and Hewlett Packard. Limiting structure this way restrains competitive innovation's ability to grow in size in both the hardware platform and operating system markets.

Structurally, establishing the consumer recovery range dividing by 2 and 4, breaks out computers which sold through with the rebate as a traditional cooperative advertising allowance, verse all other systems, sold through by media based on the skewed weight of fee pools secured from overage as a transport incentive. Prior correspondences describe this system structure which is the Intel Inside rebate-fee scheme juxtaposing horizontal dealing combinations; based on explicit contract in the service of Intel Corporation. In essence a market allocation scheme in which media throttles specific computer brand model sales to accelerate the clearing of skewed and weighted Dealer fee pools. Strategically this includes media organizing themselves as domestic cartel's of coordinated sister publications with interlocking executive directorate, to broaden their skim for the fee.

Using this method for determining consumer recovery; based on Intel financials, production estimates, knowledge of the Intel Inside fee metric, computer dealer annual sales vis Intel output, this analyst has estimated consumer recovery of the hidden media transport commission fee at between \$5 billion & \$11 billion worldwide. At topic currently is the nation who will take judicial leadership in recovery & distribution of consumer recovery.

Analysis for movement to hearing stage:

Following, multiple filters and frameworks are explored for moving the Intel case matters to hearing stage. Filters include review of three prior for moving a Sherman Act true positive to hearing; Easterbrook, Calvani filters & monopoly share. In this correspondence the analyst will expand on monopoly share using 9th Circuit filter considering Intel in input and output markets. Examination will conclude with MCI test, no economic sense & profit sacrifice test, Areeda-Turner below cost price test on Pentium III shrink data set, predator price test, elasticity example, efficient components price & general universal test.

Intel Rebate-Fee Scheme is Section 1 Contract, Combination, Conspiracy to Restrain:

First and foremost Intel competition violations are Sherman Act Section 1 per se condemnations of law. Subsequently no other tests are required as Intel anticompetitive conduct, systems, structure and environmental factors; such as the transport fee scheme, existence of multiple horizontal dealing combinations and cartels, can be assessed through Section 1 rule of reason on existing case precedence. Over nine competition cases support that the Intel Inside commission fee is, and always has been, illegal.

Section 1 multilateral industry analysis does in fact prove Section 2 unilateral claims. For example, Intel intent to monopolize can be seen in percent increase of the Intel Inside re-

bated-fees accrued to horizontal Dealers between 1993 & 2006. Note that increases in the Intel Inside master fund are on the books monies. There are in addition off the book's allegations.

Noteworthy is that this Intel investigation began in 1992 with conduct sightings including knowledge of the Intel Inside scheme; by 1995 seen through repeating pattern in the work field, in 1996 moved to FBI report and assessment of why the intent, in 1996, 1997, 1998 attracted opposition which built through 2005, in 1999 identified structural attributes first by case precedence, confirmed by systems structures and validated by industrial management and economics. Since 1999 this case brief has been constantly refined by this analyst. I anticipate exponential discoveries from this foundation analysis given government investigative and analytic resource's much greater than my own.

Section 2 analysis:

Inherently, then, assessment of the Intel case matters through Section 2 methods is duplicative if not after the fact. However it seemed like a fun exercise and supports this analyst's work identifying what I have described as a matrix combination. An x:y matrix of interconnected cells; a racket, in which Intel x86 intra platform computers are routed vertically in inter state commerce and inter nation trade. With the vertical route formations formed by first establishing the cross tying of horizontal dealing combinations. In other words multilateral conduct is required to lead the many unilateral routing effects. These effects between Intel enabled multilateral channel entry and exit points, made it possible to sandwich together 27 adjacent laterals of x86 computer industry, channel and market structure to form the matrix combination. A matrix of cells which limit, guard and accelerate Intel values moving down channels within the horizontal field effects of many vertical bridges established by multilateral entry and exit points. In this sandwich formation security dealers, for one, are caught in the middle of the juxtaposing combination's transport effects.

Frameworks & Filters for movement to hearing stage:

Note the following lenses weighing forward movement to hearing include this analyst's evolutionary refinements.

Calvani Filter:

- | | |
|---|--------------------------|
| 1) Is the restraint inherently suspect | yes |
| restrict competition | yes |
| raises price | by percent of fee |
| decreases output | increases throughput of |
| | Intel output tied to fee |
| 2) Is there a plausible efficiency justification; | |
| enhanced competition | no |
| reducing cost | no |
| stimulates Intel surplus sell thru w/charge | yes |

Easterbrook Filter:

- | | |
|---|--|
| 1) Does defendant hold market power | 81.47% x86 CPU market share.
majority of the value stream |
| 2) Does defendant have an incentive;
to behave in an anticompetitive way
are sanctions necessary to correct
conduct remedies
structure remedies
environment remedies
criminal remedies
remedies understood in advance of hearing
potential methods of over sight regulation | yes
yes
yes
yes
yes
yes
yes
yes
yes |
| 3) Competitors use different;
production methods
distribution methods | yes and no
yes and no |
| 4) Output reduced by challenged parties | through time |
| 5) Sales of challenged parties restrained | yes |
| 6) Identity of plaintiff; rival the same | horizontal competitors
vertical rivals |

Inputs Market Power:

- | | |
|---|---|
| 1) PC x86 microprocessors | Intel 81.47% x86 mkt share |
| 2) industry vertical components taper | Intel x86 CPU, embedded
memories, chip set, graphics
processor, main board,
storage sub systems. |
| 3) horizontal dealing combination | lateral of MPU resellers |
| 4) supply schedule bottleneck
has Intel provided justification for bottleneck | yes
no |
| 5) likeness to see (supply schedule) leap frog competition
likeness to see platform innovation leads | no
demonstrated leadership
by Intel competitors & rivals |
| 6) IP theft of competitive innovations by Intel | yes |
| 7) Intel durable monopoly power in inputs market | yes |

Outputs Market Power:

- | | |
|---|--|
| 1) PC x86 microprocessors | Intel 81.47% x86 mkt share
majority Dealer share |
| 2) vertical distribution routes | yes |
| 3) horizontal dealing combinations | lateral of PC Dealers transporting product tied through
2nd lateral of media sales outlets. |
| 4) bottleneck in commercial channels of distribution
has Intel provided justification for bottleneck | yes
no |
| 5) Intel durable monopoly power in outputs market | yes |

Ninth Circuit Filter:

- | | |
|--|---|
| 1) relevant market monopoly share | yes; 81.47% x86 mkt share |
| 2) significant barriers to entry | yes |
| 4) limiting behavior in the relevant market(s) | yes |
| 3) barriers preventing competitors from
increasing short run production capacity | yes |
| 5) entrant/competitor production capacity to take
business away from incumbent monopolist | no |
| 6) entrant/competitor ability to take business
away from incumbent monopolist short run
to short run for long run gain | not demonstrated
dysfunctional oligopoly |

MCI Test:

- | | |
|---|--------------------------|
| 1) Intel as a monopolist | |
| Market share | 81.47% x86 MPU mkt share |
| Durable monopolist inputs/output markets | yes |
| Abusive monopolist 9 th Circuit Court filter | yes |
| 2a) Can others duplicate essential facilities: | |
| input market component taper | AMD has near duplicated |
| output market transport bridge | no; Section 1 illegal |

MCI Test:

- | | |
|--|--|
| 2b) Co-op program possible w/legal pass thru
for horizontal competitors
competitors defray Intel fee cost w/lower CPU price
competitor parity rebating Intel fee in low CPU price | yes
18.53% insufficient capacity
yes, has been done
no; lowers competitor total
revenue, reduces natural
trickle down revenue levels
to channels, lacks MPU tie to
media layer. |
| 3) Monopolist Combine denies access | Network access for Intel
CPUs charged with MPU
transport effect before
all other natural values. |
| 4) Is the facility available to competitors
component taper within inputs market
distribution bridge within outputs market | yes, possibly
no |
| 5) Intel engineering reasons for essential facilities;
input market platform component taper

output market Dealer transport bridge | platform definition
platform leadership
bundling @ price < rival cost
no engineering justification
for these horizontal buttresses |

No Economics Sense Test:

Fee as input efficiency justification -

As a banking strategy charging Intel microprocessors with the transport effect causes Intel surplus production to be transferred by Dealers, through channels & into brokerage, forming a bank of Intel microprocessor surplus for resell in excess of what Dealers could have sold through to consumers in their associated computer brand models. Through this distribution arrangement Intel allocated Dealers filter to pool the Intel Inside media transport fee for them selves before passing microprocessor overage to others sans the media transport fee incentive. Intel leveled this playing field in 1997, however, the adjustment never made up for massive pools established by primary Intel allocated dealers. This adjustment adds Intel tertiary computer resellers to the Intel Inside scheme, despite their indirect status and lack of purchase power. The adjustment coincidently raised barriers for Intel's horizontal x86 competitors in a distribution segment that had been traditionally free from Intel's non-organic 'extra economic' restraints.

For Intel charging microprocessors with the transport effect in a dominant position causes Intel production to be sold through allocated Computer Dealers by media first & all other x86 microprocessor production to be sold through Dealers second. This leveled model increased that effective switching hurdle. An x86 microprocessor competitive parity position is not available or possible given the illegal nature and extent of the charged effect.

By Intel charging microprocessors with the transport effect media throttles Intel microprocessors to release the charge more quickly. Thus publishers limit page support of x86 microprocessor competitor products to that diminutive player's restrained market share.

By charging microprocessors with the transport effect, Intel encourages media to displace diminutive Dealer market share and to gravitate their computer sales revenue to Computer Dealers whose product brand models represent ever larger growing transport fee pools.

This transfer act was central to Intel Network's market allocation scheme misappropriating 2nd tier computer company sales revenues towards first tier, and then whittling down this horizontal combination to its key Dealing agents. There is little that is natural about how x86 computer company market shares played out between 1993 & 2001 and then on out through 2006. Before 2006 market share winners were primarily defined by Intel plus media imposed structure. That is gaming of structure by corporate + media combination.

Fee as output efficiency justification -

None; in light of natural end market demanders for Intel's well regarded microprocessors no transport fee was required for these products to naturally find their way into consumer market end computer sales. Untying fees from Intel deadweight brings into balance Intel allocative and productive efficiency maximizing total economic welfare. So doing would have preserved the x86 microprocessor industry oligopoly welfare spaces for competition on the merits in the interest of Nation, society, consumers and democratic capitalism.

Does the dominant firm's conduct have an
actual tendency to eliminate or reduce competition? yes

Does the conduct provide an economic benefit to the
dominant firm only because of the tendency? yes; move Intel deadweight

Are costs imposed on the dominant firms competitors
by doing so? yes

Are dominant firms profits sacrificed? yes; percent of transport fee

Profit Sacrifice Test:

Outputs market - The Intel Inside fee and cost to administer the scheme place an illegal cost on Intel stockholders exceeding \$21 billion subsequently decreasing profit.

Profit Sacrifice Test:

Inputs market - Undoubtedly the basis for debate, Intel desktop microprocessor short run production peaks typically indicate a marginal revenue sacrifice.

Does the dominant firm's conduct have an actual tendency to eliminate or reduce competition? yes

Did the dominant firm's conduct require it to forego profit in the short term? yes

Would the profit sacrifice be irrational if the conduct had no tendency to eliminate or reduce competition? tbd, inputs market
yes, outputs market

Areeda-Turner Below Cost, Profit Sacrifice & Predatory Price Test:

This analyst has reviewed the economics of eight consecutive Intel desktop microprocessor short runs. They include Pentium P5, Pentium P54c, Pentium 54cs, Pentium w/MMX, Pentium II, Pentium II shrink, Pentium III & Pentium III shrink. Data is at hand for Intel mobile, mobile value and server microprocessor product category analysis. Pentium 4 data is available. *The data set, and its misuse, is prima facie evidence pointing to the market allocation rig.* Pentium III desktop shrink production data is shown on the next page.

The Areeda-Turner test presumes predatory pricing if and when cost is below marginal cost, or if that cannot be determined, below average variable cost. As primarily a second degree price discriminator, Intel's marginal cost is the cost to produce one added unit of output. Conversely, Intel's marginal revenue potential is the sum earned by selling one added unit of output at price.

Economic analysis suggests Intel will sell below average total cost too within the boundary area of average variable cost down to the cost of manufacturing one unit. Typically at end of run Intel will square the supply schedule at a monopoly competitive or equilibrium price for two to three quarters, after which, Intel will continue to sell the same obsoleted product taking economic profit over an accounting profit. This is akin to taking a well aspirated V8 engine and clogging up the exhaust pipes. In essence, Intel floods the channel. Intel relies on this dumping strategy, short run to short run, stalling all competitors now awash in Intel microprocessor surplus at or near Intel cost. This Intel strategy disables all competitors in the long run.

Coincidentally, Intel will introduce a new microprocessor offering roughly equivalent performance to the obsolete product, at the same time, at an increased price. This new product's performance will see incremental performance improvements and increasing quantities, sometimes increases from the introductory price, before accelerating its supply output at ever lower prices.

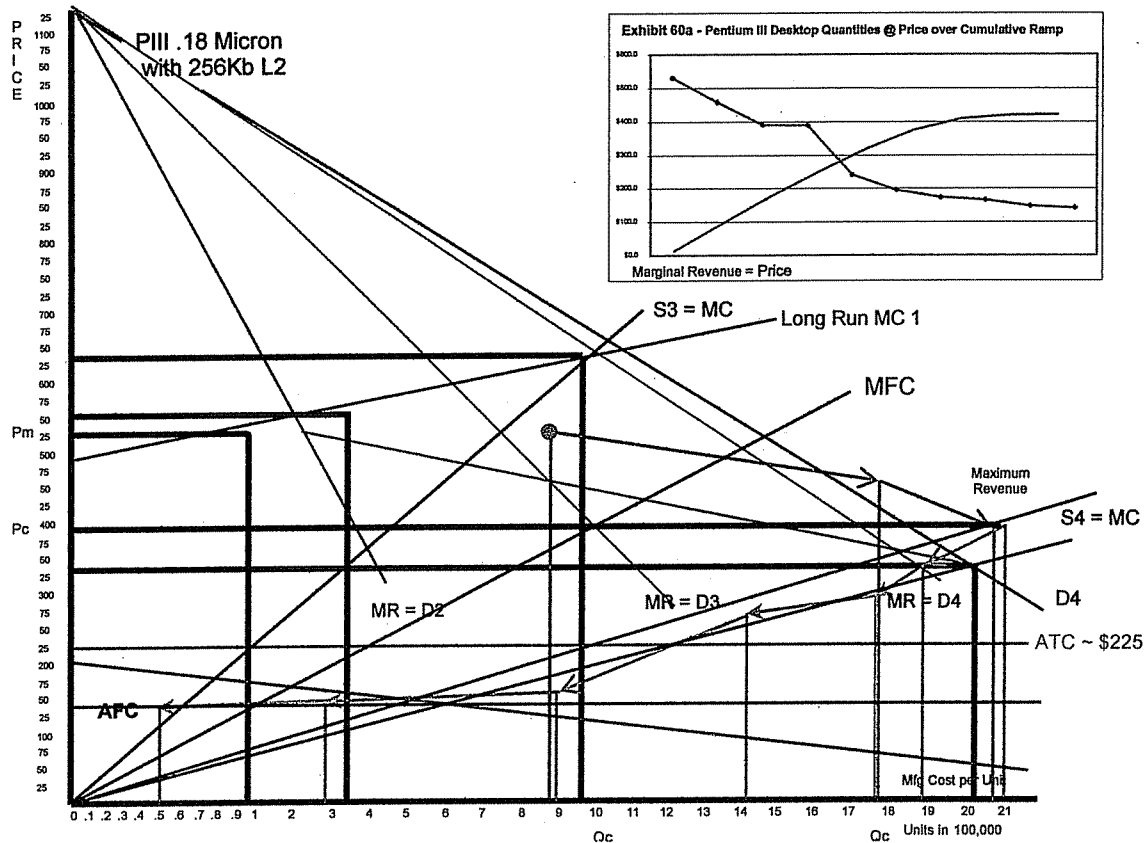
Pentium III 500 MHz – 1.13 GHz; Commercial End of Run Production

Period	qtr/yr	Price/Unit	▲Price	% ▲ \$	Qty per Period	% ▲ in Cum Qty	Period Revenue	▲Revenue	É
1	q4 99	\$530.56			9,044,000		\$4,798,384,640	\$4,798,384,640	
2	q1 00	\$457.22	\$73.34	13.82%	18,335,000	74.71%	\$8,383,128,700	\$3,584,744,060	14.67
3	q2 00	\$389.38	\$67.84	14.84%	21,648,000	79.07%	\$8,429,298,240	\$46,169,540	5.33
4	q3 00	\$387.78	\$1.60	0.41%	21,840,000	44.55%	\$8,469,115,200	\$39,816,960	108.4
5	q4 00	\$239.95	\$147.83	38.12%	19,615,000	27.68%	\$4,706,619,250	\$3,762,495,950	0.73
6	q1 01	\$194.43	\$45.52	18.97%	18,242,000	20.16%	\$3,546,792,060	\$1,159,827,190	1.06
7	q2 01	\$174.08	\$20.35	10.46%	14,907,000	13.71%	\$2,595,010,560	\$951,781,500	1.31
8	q3 01	\$165.95	\$8.13	4.67%	9,233,000	7.47%	\$1,532,216,350	\$1,062,794,210	1.6
9	q4 01	\$148.00	\$17.95	10.82%	2,998,000	2.26%	\$443,704,000	\$1,088,512,350	0.21
10	q1 02	\$143.00	\$5.00	3.38%	502,000	0.37%	\$71,786,000	\$371,918,000	0.11
Weighted		\$315.16	Average \$		136,364,000		\$42,976,055,000	Mean	14.8

For complete PIII shrink data set spreadsheet see your State Attorney General.

Behold the illusive Intel Roller Coaster; PIII marginal revenue quarter to quarter (follow arrows 1, 2, 3 - 10). The analyst could have shown traditional examples of monopolization, however, offers this example for considering cost price analysis.

Pentium III 500 MHz – 1.13 GHz; Marginal Revenue Quarter to Quarter



Note concentration supply condition and no squaring of schedule for clearing. Pentium 4 is introduced at PIII shrink period four; between $S4 = MC$ and $MR = D4$ at \$722 average price. At $MR = D4$ PIII shrink average price is \$325 and through four additional quarters of inelastic production drops through Average Total Cost to approximately Fixed Cost.

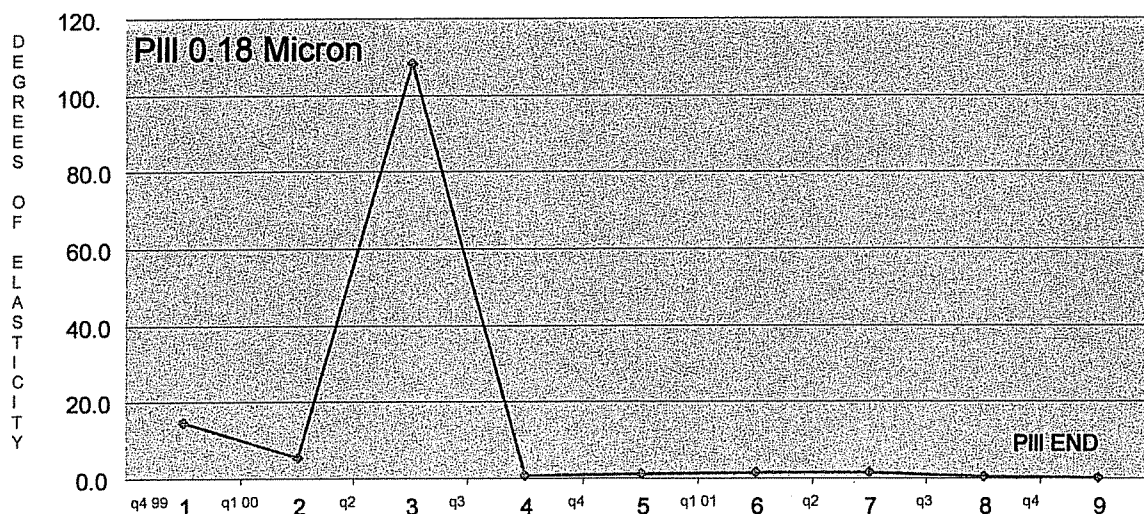
All products including at cost product, is charged with the Intel Inside commission fee, although at ever lower percentage value's based on ever lower microprocessor prices.

Marginal revenue analysis suggests Intel is dumping Pentium III at an average price of \$457 on AMD Athlon just following Intel's Pentium 4 introduction at an increase in average price of \$722; ranging from a low of \$625 to a high \$819 in period.

This suggests a Pentium III predatory price move toward end of commercial production run. Note long run marginal cost is an anomaly in this P6xx analysis. That is because Intel's processor long run marginal cost 1 primarily represents Intel's monopoly price for Static Random Access Memory embedded into each microprocessor. Similar to 386 platforms, this incredibly expensive embedded memory suggests the Nx586 platform strategy separating L2 onto main board superior for stimulating premium memory market growth segment; driven by consumer application performance needs.

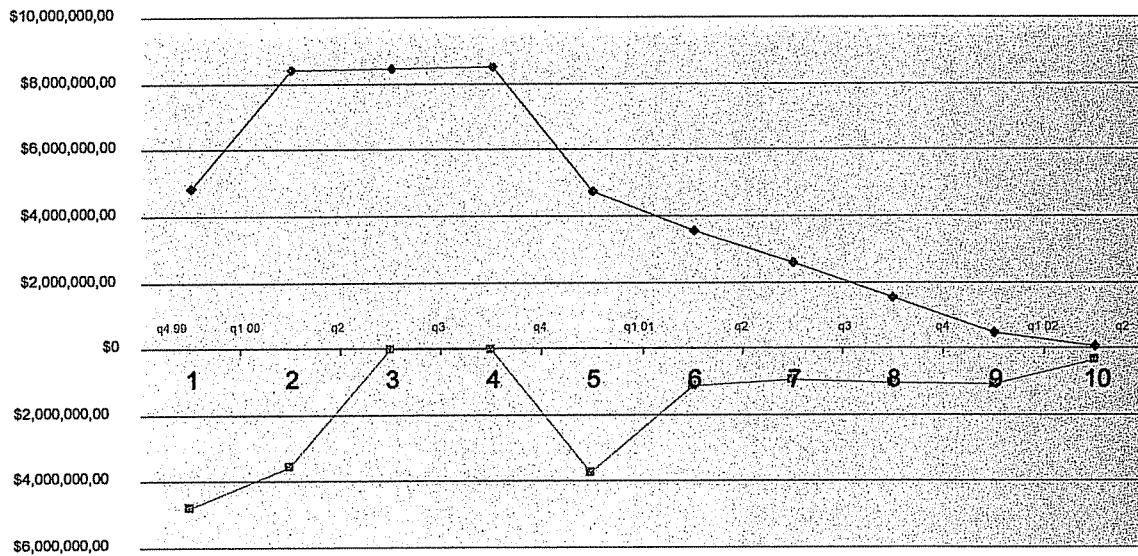
Below find PIII Shrink elasticity; note artificial elasticity spike quarter three and quasi (in)elastic quarters four through nine during periods of at cost price dumping. Elasticity spikes typically represent the pendulum swing between Intel allocated dealers reselling overage through to secondary channels. In this example Intel floods the market with PIII product period to period. This stalls, to stops, all x86 microprocessor channel flow's except for Intel's and other highest margin products.

Pentium III 500 MHz – 1.13 GHz Price Elasticity Commercial End Run

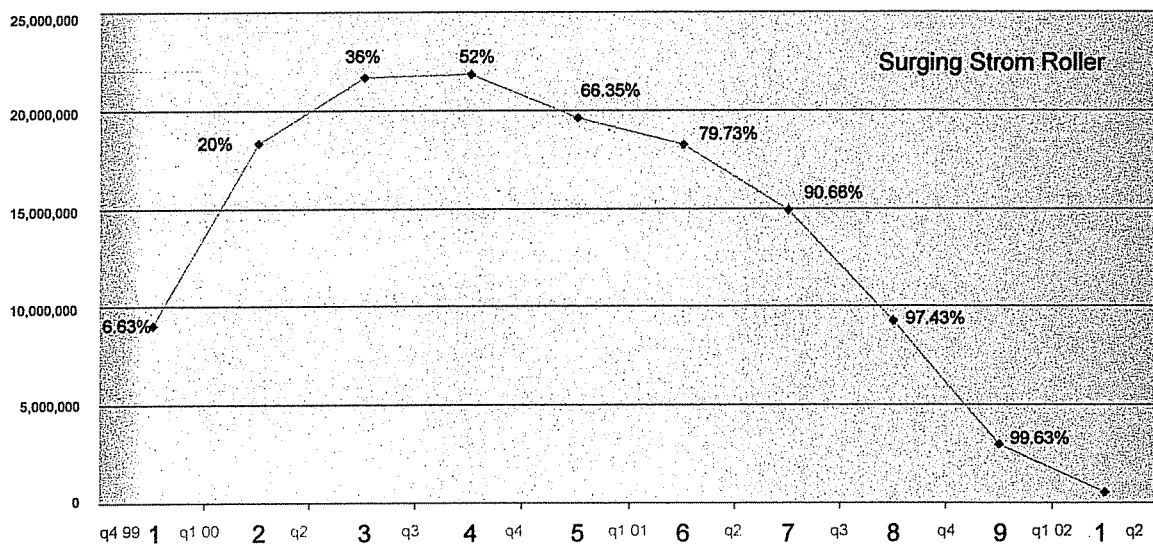


Below find PIII shrink total vs. marginal revenue; note flat margin across elasticity peak. Highest margin quarters represent monopoly price followed by monopoly equilibrium or a monopoly competitive price. Quarters six through 10 represent inelastic product dumping.

Pentium III 500 MHz – 1.13 GHz; Qtly Revenue over Change in Revenue



Pentium III 500 MHz – 1.13 GHz; Quarterly Production in 100,000s of Units



Pentium III shrink output per quarter; note production wave form of a concentration supply condition.

Efficient components price standard:

States that dominant firm conduct should be unlawful if it would be likely to exclude a rival that is at least as efficient as the dominant firm. The question then is what about the less efficient firms? Firms pursuing component innovation in open (desktop) and embedded (notebook) x86 platform markets.

In Intel case matters the question is really one of bundling and perhaps tying component ingredients of the Intel industrial taper; microprocessor, chip set, graphic controller, main board and more recently the question of Solid State storage sub systems.

For this analyst within industry as a market communicator, x86 product evangelist, Intel market strategist, some input violations were easier to see from their repeating patterns at market level than others. For example, the Intel Neptune mother board bundle. This Intel bundle included Pentium microprocessor, chip set, motherboard, Intel subsidized memories. In 1995 I investigated why Nx586 platform sales obstacle in the North East region. That obstacle was in fact an industry wide obstacle where Intel's Neptune mother board bundle was offered by Intel at a low price to supply the same components at or below rival cost; all tied to the Intel Inside fee scheme. There are newer input examples & others would be more aware.

General universal test:

Beyond the question of component bundles, back to key considerations for moving Intel case matters to hearing stage for input and output market monopolization:

- 1) Input market practices tend to eliminate competition? yes
- 2) Dealers tend to focus more on the monopoly supplier? yes
- Supplier practices tend to deny competitive access? yes
- 3) Output market practices tend to eliminate competition? yes
- Practices raise costs, make competitors less effective? yes
- 4) Intel network effects tend to eliminate competition? yes
- 5) Contract for horizontal combination? yes
- 6) Cartels as subsets of combination? yes
- 7) Economic justification for input & output practices are reasons enough to outweigh anticompetitive effects? no

Respectfully Submitted,

Mike Bruzzone
Intel Case Technical Analysis since 1996

November 1, 2007; *latest revision of September 10th with news bits and now more polished.*

To: Members of the National Association of Attorney Generals
Members of the United States Senate
Federal Bureau of Investigation
Central Intelligence Agency
Homeland Security
Federal Trade Commission
Security Exchange Commission
House of Representatives

Re: **Issues of subsequent supersets of Intel Corporation competition violations.
Call to action remedy from the B.O.D. and Chief Executives of Intel Corp.
Federal oversight reversing unwarranted political protection of Intel Corp.
Call for Competition, Rackets, Espionage, Obstruction Remedies by DOJ & FBI.**

"Now for the believer in democracy . . . whoever is prepared to relax this requirement and to accept either frankly undemocratic procedure or some method of securing formally democratic decision by undemocratic means, thereby proves conclusively that he values other things more highly than he values democracy" - Joseph Schumpeter

Dear Editor:

(New Introduction) This correspondence is for real time insight considering the dire impacts on competition, homeland security, constitutional, human & civil rights for all citizens in one case where technocracy has eclipsed the State and Federal Power. Through a 16 year period where some corporate staff, their security forces; contract & private, some attorneys, State and some in Federal regulatory agencies, and Federal, State & local law enforcement agencies failed for a period to register, correct system and process errors, including where criminal sub groups operating in some domestic Corporations misguided Federal & State regulators and took over some governance controls through their network criminal influence.

This phenomena encompasses multiple domestic corporations, begins with competition violations and then a slippery slide toward rackets and espionages hidden in the malfunction. Pointers and proofs offer physical evidence of an extended failure which engulfed government & law enforcement until by all logical reasoning the crime was figured out? Leaving this Federal assistant and State's Aid in the Intel Corporation competition investigation, as direct witness to this crime to conceal competition, racketeering, industrial and economic espionage; destitute, following a nine year obstruction of justice leaving all Intel targets lacking justice, vindication, reconciliation. Not unlike what happens to any citizen on their nation's soil in the observing path of the enemy's destruction.

Targets are painted, maligned, defamed, unknowingly framed, stripped of their cash flow as the defense strategy for their target's disqualification and financial drain; preventing individual victims & corporate entities alike from aggressively pursuing their case remedies including ability to secure and maintain legitimate legal counsel.

These targets are, first, Intel's horizontal competitors internally dismantled and externally concentrated and transformed toward rackets. Second, Intel intra platform personal Computer buyers who were charged an excise (transport) tax by the Intel Media Combination. That excise recovery amount certainly exceeds \$5 billion and within the Orange County, California congressional district, has been roughly calculated at \$100,000,000. Three, the owners & public shareholders of Intel vertical compliments artificially constrained for the concentration & misappropriation of their sales revenue by the Intel Network. Four, this reporter operating as an employee and a lettered civic servant who refused solicitations by the Intel Combine; between November 1991 & 1995 while being framed in inter-state contraband transport, intellectual property theft and other crimes yet to be fully detailed; finally, misprisoned by them through nine years of this Intel case obstruction. Five, like those listed here there must be others; so how many others? Six, in fact each and every American and citizen's all over the world. That is because this case in technocracy is the world's leading case documenting inherent difficulties of Corporate +Media Combination. Correspondingly, matrix combinations dire effect on technocracy, democracy, governance, market-driven capitalism, legitimate competition, home land security and nation's defense when and where organized crime, is left unaddressed, and Corporate crime's under regulated if regulated at all.

This is not unknown yet remains generally concealed by corporate enterprise and government alike. That is investigation of a domestic criminal network engaged in competition, rackets, industrial and economic espionages. Where Federal authorities are yet to charge those individuals who are known, subsequently they can continue along on their criminal paths within the aforementioned and other corporate enterprise. And in some instances where the California State Department of Justice allowed, if not enabled, some involved in components of this case to escape including through an obstruction designed to foreclose on this administration of justice.

This is obviously a potential pitfall when ever Justice turns a blind eye to enterprise network corruption, competition violations, rackets & espionages occurring in jurisdiction for over a decade.

Further, corporate interest can be faulted for in fact concealing, misinforming and misleading government in these case matters. That is an obstruction of justice to foreclose on the administration of justice by participating in accomplice. That is to hinder legitimate investigation by concealing and misrepresenting the fact of racketeers and industrial spies buried in and operating within these very enterprises. By the record the period of this governance collapse occurs from at least 1991, so, for the subsequent sixteen years now.

That concealment in accomplice has got to stop as the alternative is unacceptable for the national defense. If remedies continue forsaken, this analyst suggests position of State Attorney General should become an appointed position for individuals engaged over the

toughest and inherently most dangerous cases; including those that deal with organized crime and corporate network warfare. Because in the opinion of this analyst that's what cleaning up competition, rackets and espionage violation takes. Dedication to the tough case's that affect society most broadly. No more cushy-cushy in the Office of the States Attorney General. No more simple focus solely on the easy, or worse, the invented matters that take up and limit bureaucrat and State resources.

In this updated correspondence, in receipt of Congress and Senate Judiciary Committee, industry facts have been integrated into the correspondence to add detail. All crimes detailed in this correspondence remain standing violations of law waiting judicial remedies, and law enactments that will forever prevent this type of worldwide industrial social tragedy from ever happening again. And, in the case of the Intel competition matter, moving toward its multi-nation decision making for controls. Which in the opinion of this analyst, could mean multilateral nation's review, rather than simply sequential acts of leadership.

Pursuant to the Intel Corporation competition case, each of your States is entitled to consumer recovery from certain Media Enterprise and Intel Corporation in totals recorded in Intel financials at up to \$21 billion. In one estimate, *consumer recovery* for Orange County, California, alone, has been roughly calculated at \$100 million dollars. The European Union & South Korea are presently positioned to take control of this Intel case and monetary recoveries lacking U.S. Federal or any State interventions.

I do believe the Federal government is positioned to take leadership in this case. Yet that act of leadership remains for each of us to gauge.

I'm going to state the importance of resolving these Intel case matters here. How can any country triumph over any legitimate world affairs, including any legitimate war, when it is unable to prevent industrial and economic espionages from undermining its own nation and from within its own borders? In this Intel case an industry essential for this country in terms of providing semiconductors, and computing equipment, employment and economic potentials was in fact structurally messed with by racketeers and industrial spies.

In the opinion of this analyst, this systematic economic attack to artificially concentrate the domestic technical industry of this country was in fact WW III; a hidden geo political economic war. And we lost. A loss primarily due to a lack of governance controls where racketeers & industrial spies take over corporate and nation's systems controls

One other observation early on in this correspondence; seventeen new competition laws have been offered up to the Senate and Congress to aid in preventing competition violations that include and rely on espionages. I'm certain there will be a few more law enactment suggestions. I am asking your assistance in support of those recommendations.

In addition, law enactments to curb private security companies of which there are at least three in this case; from proactively participating in, concealing & perpetuating competition, racketeering violations & espionages for their corporate handlers must be addressed.

Important to note is that this Intel case offers a prime example where Intel private security company crimes are in fact occurring within our own domestic borders. This is an in-

tolerable situation for the National defense where mercenaries are active in-country perpetuating a crime; knowing or not for their handlers, and both of these two types of actors requires address within the frameworks of the law for law augments and new enactments.

In the U.S. Federal matter, some of the following entities are involved in the perpetuation and concealment of competition violations, racketeering, industrial, economic espionages occurring within their own enterprises since 1991. They include Cyrix Corp., Advanced RISC Machines, NexGen, Advanced Micro Devices, Pinkerton Security, Intel Corp., the Incident Management Group, Paragon Security, Stanford University, Integrated Device Technologies, the San Jose & San Francisco Offices of the Federal Bureau of Investigation, the California Department of Justice, Marin County, California DA's office, local law enforcement agencies and a cadre of fixers including attorneys and specialists.

Some of these government and public law enforcement agencies were misled by Intel Corporate Executives, their Security and Private Investigators; Paragon and certainly the Incident Management Group, with Pinkerton involvement still masked. Apparently some of these State and Federal agencies have now been documenting the crime of obstruction of justice, and misprisonment of this State Civic Servant, who is a direct witness to these crimes. Crimes that are an enterprise network corruption to conceal competition, racketeering, industrial and economic espionage violations by Intel Corporation and security forces, others including corporations caught in the malfunction because in doing so they conceal the fact that espionages take place within their own enterprises.

These acts of information transfer and IP theft are recorded across various companies and employees. Witnesses to the crime were threatened and targeted if they did not play along. Others who were defamed and unknowingly framed, such as myself, are still waiting due process & reconciliation from these aforementioned corporations who lacking legitimate governance remain in violation of laws and world human right's conventions.

Further, through this governance malfunction, corporate racketeers and a cast of PC Media industrial spies looted Intel competitors as they sunk financially under criminal restraints. Still others transferred secure and confidential data from Cyrix and Advanced Micro Devices certainly into Intel Corporation. Facts are undisputable, substantiated by the record and await judicial scrutiny. In the case of Cyrix, Intel certainly owes owners and investors of this target more than that first \$10 million resulting from settlement of Cyrix's 1989-93 Intel cross-action, followed by the meager value of a 370 socket license. Time will tell in the cases of Transmeta and Advanced Micro Devices.

The after mentioned is what happens to Intel Network targets who over a 10 year period refuse criminal solicitation, investigate & report on competition, rackets & espionage violations occurring around them within industry; of which I am one, to their employers, too Federal and State agencies and law enforcement. I am writing for your assistance to help in reversing the downsides of this type of citizen service to assure that these types of incorporate network crimes never happen again. Too establish a framework for legitimate governance institutions. For laws enacted and especially those that support the constitutional and human rights of those involved and protect reporting witnesses including those that are private citizens and investigators, State and Federal investigators, State and Federal witnesses.

I believe all of these aforementioned case matters are now recognized as including pre-meditated and malicious corporate constructions by investigating agencies, including by the California Department of Justice, the FBI and CIA.

One of my questions is why haven't the industrial spies been arrested? Another is how can any legitimate governance institution operating under a Corporate Charter get away with these sorts of competition, rackets and espionage concealments, which are crimes, for a period spanning sixteen years? Finally, where are State & Federal judicial actions in these competition, rackets & espionage cases? Again, I have championed leadership in this country because the crime started here; however, have begun to recognize the greater multilateral decision criteria given a crime committed across nations.

Incidents occurred over a sixteen year period in the x86 CPU & personal computing industries where this environment was not unknown; including among legitimate State and Federal investigators. In this particular instance where enterprise network corruption is one of the causes of a system failure, and this perpetuating catalyst, for the subsequent 16 years. Subsequently, this Intel antitrust matter offers a mature example of a total system failure including for thorough congressional review and judicial scrutiny. With the aim of oversight and law enactment having considered some of the poisonous fumes from a form of market capitalism that can asphyxiate democracy and democratic capitalism.

(Updated Body) By January 4, 2008, Intel Corporation must in some form respond to E.U. competition authority charges of being caught in some form(s) of anticompetitive conduct. Those forms can be identified within industrial development, channel & market structure by their cross segment mechanics, can be defined at each constituency lateral including by dealer and agent types.

This correspondence is meant to enlighten the reader on a range of issues related to the case; historically covered up by Intel, body political & legal fraternal, including other elements who appear from the general conditions to share some similar forms of these network abstractions. At this apex pin point the pattern also seems to be seen in patent right and other claims where legal clans operate within the technical guild to mind their network's financial bets.

This level of Corporate-political corruption which enabled a Corporate Power Network to operate beyond Nations laws for over a decade, affects every American given proofs of Intel Network Manipulation including, either misguiding or recruiting, to dissuade from investigating and to conceal Intel competition, racketeering and espionage violations occurring within and in proximity to Intel. So extensive is this effect that results spill over from Intel to consume competitors, eclipse competition, social, human rights & Nations law. Subsequently society best interests at stake for governance, oversight and fail safes.

This Intel Case proves beyond a shadow of a doubt that Corporate + Media Combination exist to manipulate government and consumers alike. And, far worse, for some operating from within technocracy to perpetrate their plan to rewrite our democratic history toward their own aims. That is to mask a prior history that academics, scientists, inventors and philosophers have documented isolating the methods Corporate Network Control would be implemented in the final decades of the last century to eclipse the Federal Power. That

is for the explicit objective of gaining Network Control over State & Federal authorities, and subsequently Nation control. Certainly one of the reasons this case is on the docket in many socially responsive countries.

The Megatronic System known as Corporate Network Power Complex is the source of troubles. Rampant technology accelerated by system games with disregard for normative values, constitutional, human, civil rights and Nation's law results from the decisions of anonymous technocrats; scientists, engineers, corporation, publishing, advertising executives, academic institutions and attorneys. They can compose a network engaged in defining systems which attempt to gain complete power and to extend its authority into all areas of human life. We must resort to legal precedent, law enactment and cultural innovation to positively affect this network and rid ourselves of their illegal systems.

Because this Intel case matter is so broad in all its merit compounded over a sixteen year period, I believe this single case, is the one case, to reinvigorate market capitalism back onto its legitimate democratic path.

In cultivating your awareness of this heightened state of democratic alarm, at this stage of their Corporate Network Plan, are rogue elements attempting to conceal the disintegration of democratic capitalism into any number of its Feudal States? And can a multipoint network manipulation continue leaving the whole of this Intel case matter unheard and thus whole remedies lacking? If so, *that is because at that very moment in this collapse of normative adjustment democratic capitalism will end.* And in so doing discount one hundred years of prior research detailing how this scenario was likely to occur described by academics, scientists, inventors & philosophers. And now where some media generally have been caught writing over this warning, to hide system truths, including their participation in a rewrite over history to conceal these facts of their system structural gaming.

This long time reporter advises Intel's only rational option is to concede to charges of maintaining limits that restrain, across multiple laterals of PC industry, channel & market structure. To do otherwise would be a sin beyond antitrust compliance that would surely restrict Intel from fully participating in the definition of remedies affecting that enterprise.

If Intel can do one right thing, they should present a list of their competition errors, and a list of solutions how to remedy the use of monopoly regulators, and finally, to negotiate reparations for all those ill effected in this dirty hidden war for geopolitical economic control of microprocessor and standard platforms deployment. Doing so honestly & equitably showing Intel legal has truly changed toward the better & the good. That must include too cease and desist from what must be the longest continuous log of privileges & immunities violations, by any legal team, in the history of modern business. If not know that this problem continues at Intel and thus an enabling cataclysm everywhere else.

Use of system games for creating monopoly bottlenecks placing undue burden on natural competition must be removed. That is because Intel structural deployments within Industry and especially Channel structures continue to be an unnecessary restraint in relation to the organics of Intel's natural market generators. Based on those product utilities which can naturally cause market demand for Intel products on their own merit's and not on the

merits of a rebate-fee arrangement, or any other non-organic assembly intended to cause product pull that Intel Network effects can combine to route.

Intel structure is ripe with field effects whose working mechanics are condemned per se illegal under domestic competition case precedence. Its time for Intel to cease incenting these crimes in organization, distribution, media, financial and legal channels and retake the governance reigns of their entire network's system management structure. To transit an infliction point that tolls in an Intel renaissance for the good of all industries, society and Nations including Intel as a vital component *of the total resource*.

From the perspective of responsible governance, diplomatically, there are few options for Intel at this point in the maturity of the violations. Historically Intel charges of anticompetitive conduct in the 1991-93 and 1997-2000 domestic actions, and subsequently in Japan, result in parties dropping cases, some form of push with Intel, or Intel agreeing to remedy some diminutive causes of action. This can hide a bigger picture in supersets not addressed.

These conditions are a result where development regimes, and in this case a monopoly operating autonomously *as state within an eclipse of states*, places structural, economic, social and legal findings relating to its own business practices beyond the purview of not only those directly affected, but from our greater society whose interests are most at stake.

In this environment where development states become obsessed with regime maintenance over fairness and social justice, management and structural integrity, core power centers become engrained with problematic sub groups, a polarized leadership, debilitating trade, guild and interstate diplomatic effects as this Intel case demonstrates.

Having worked on this case for ten years there are more than a few people who now understand our society's interest are in hand with this Intel case. Interests that need to be guarded from what Intel Networked brought onto society; and that is a treachery. Dutifully, this requires that every American gain an understanding of what's at stake within these Corporate Network Complex cases, in this leading case, where Intel is simply one of the actors and only in this one market example. This complete example over a sixteen year computing product cycle; from innovation through maturity phases, offers the foundation for remedies and regulation preventing this type of industrial/social tragedy from ever happening again.

So for each of us to be aware, to comprehend, to understand along the total set of legal issues presented considerations for actual remedies that improve society and industrial social prerequisite responsibilities. Those are responsibilities for legitimate governance institutions that can be trusted to legitimately regulate their own operating environment. Intel activities under review in the broader sense of competition investigations point too and can verify repeating patterns and legal violations in the multiples:

Sherman Act Section 1	Contract for horizontal combination as a restraint.
Sherman Act Section 1	Conspiracy to conceal contract & combination.
Sherman Act Section 2	Intent to monopolize + predation.
Clayton Act Part 2	Certainly discrimination & sabotage of facilities.

Clayton Act Part 3	Limiting by product routing; barricaded essential facility.
Clayton Act Part 4	Attacking competitor employees who refuse to participate.
Clayton Act Part 5	Unfair and deceptive practices.
Clayton Act Section 13c	Payment/acceptance commission compensation to route.
Clayton Act Section 13d	Payment for services or facilities for processing a sale.
Clayton Act Section 13e	Furnishing services or facilities for processing/handling.
Clayton Act Section 14	Pressed into agreement <i>not</i> to use competitor's goods.
USC 1961 RICO - 222	Elements of enterprise corruption.
Corporate Procedure 1714.9	Attorney & Client conspiracy.
Penal Code 182	Crimes against public justice.

The slippery slope of this Intel slide is that of an unregulated monopoly gone unbridled. Where the chaos created in this market environment enables rackets to form in commercial channels of distribution followed by little too no Corporate governance control over an environment that also incubates and harbors espionages. This environment enabled a spy ring operating from the Bill Ziff Davis, and racketeers within the International Data Group Publishing Companies, working in combination with Intel, to systematically concentrate domestic technology companies on an artificially accelerated basis.

This foundation on which governance has lapsed left an industry and social environment wide open too many forms of network corruption; where system subgroups that are both inter industry and cross profession, operate as business clans within a technical network. This is at a point where corporate governance fails and the merchant laws of a Corporate Super State supercede Nation's Laws. That is unacceptable under a universally accepted Nations Law. That is unacceptable for sustaining constitutional, human and civil rights.

While Intel limiters in channels for x86 microprocessor platforms that dissuade purchase of substitute CPUs and replacement platforms from horizontal competitors are at the core of this case, a superset of competition violations present an expanse of market, social, industrial stewardship and governance matters. Many of these matters place significant implications on society and thus are right to be understood by society. Implications result from a series of system governance slips; administrative process failures to much worse and is that anyway to manage a complex system?

For preventing crime and terrorism this includes understanding why California State allowed, if not enabled, some individuals from a known organized crime ring involved in competition violations, rackets, espionage & obstruction to escape? Or did they? Further, to understand why process failures occurred for over a ten year period at the San Jose & San Francisco Bureaus of the FBI? And how have these failures been remedied through the period of any legitimate investigation? Because I do believe that failure was corrected and the matter legitimately investigated. Many of the bad actors are known. So why haven't there been arrests?

Universal remedies assuring normative competition and governance values, adherence to Nation's laws can now be the result. That is because the situation has occurred, continues along its future path and remedies are now at hand. Where our choices are simple; break down or break through.

These higher levels of abstraction are noteworthy for their social impacts on normative values, industry, competitive structure, nation laws, society and democracy including the notion of what is democratic capitalism. In question within the gravitational effects of a concentrated microprocessor platform monopoly Corporate Capitalism morphs towards any number of its feudal states; devoid of some best practices and democratic principles which are the cure for those very ailments. This presents quite a social study where real Intel remedies can leave society with much greater improvements than solely those that reinvigorate Intel as a legitimate governance institution and operational steward within a competitive business structure.

Reopening the x86 inter platform PC market by eliminating bottleneck and system manipulators in industry, channels & market structure can revitalize the industrial social good as a foundation for consumer good. And supports the continuation of democratic capitalism operating within a generally understood and well agreed upon Nations law. Support in something positive that is sustainable. That now includes at least one Intel board member denouncing the strategy of bottleneck; pointing to methods defined by the Economics Department of Stanford University whose participation in the obstruction was also masked; and then there are other academic institutions.

Subsequently, your support for legitimate governance as an industrial social responsibility can now renew competition in the x86 platform market's, secure a heightened level of corporate appreciation for industrial social values, equitable industrial stewardship that is beyond approach, thus knowledge from which to prevent yet another Intel tragedy. Support that returns government and corporate regulatory performance toward actively registering for system error's capable of adding real time system improvements.

For Intel, we're talking about a computer design manufacturing firm here where these notions are not unknown. Perhaps forgotten? Ironically this fate appears more pervasive among microprocessor design engineers compared to their compute system counterparts. That's because computer designer's work within a whole system. Microprocessor designer's typically work on only part's of their total system. Perhaps Intel hasn't registered a whole picture of their system attributes?

More urgent is that with the return of this system governance capability we can also revitalize a free market strategy that can free society from one difficulty of Laissez-faire markets. That is market free-for-all's in which democratic capitalism becomes the victim of its own successes, consolidated to points where society suffers from a level of man made concentration known to produce multiple forms of democratic abuses and social losses.

In periods of chaotic free-for-alls markets are financially skimmed and individual enterprise values misappropriated. Here some trade press and distribution channels are rigged, production space is warped, consumers are manipulated and can be unknowingly taxed, society is deceived and industry participants are structurally consolidated by a king pin enabler and its business agents manipulating values toward their monopoly concentrate.

In this environment the working mechanics of individual systems though out industry, channel and market structure are gamed; using weights, period, point and other emitters and attractors. Artificial effects that bind the network into one bound up structure. A re-

latively closed system where Nations law has been eclipsed by the merchant laws of a network of Corporate States, producing a dysfunctional oligopoly, and a matrix combination warped by one very large monopoly and not much governance in the monopoly, among some of the compliments, co-operators and business agents. In this type of environment racketeers take control and viewing this opportunity the industrial spies follow.

In this environment situations are crafted, information is manipulated to fit that creation, myths are perpetuated that guard monopoly structure while displacing rational thought within an invented reality to conceal its hardware firmware interface. Within this invented reality the visible answers are often barred from the solution to problems even when very real opportunities are present for improvement. So to release monopoly binds and recover for Federal, State & Consumers and economic growth effects are bound to follow.

Racketeering combined with the acceleration of industry for the destruction of our creation's cause essential difficulties; collapse of normative values and failure of fiduciary responsibilities where legitimate governance by Corporate, State, Federal & Consumer agencies stalls and lags behind. Process errors occurring through 10 years of a Federal and State investigation verify this cascade failure. Congressional oversight as failsafe appears positioned to act. The FTC, DOJ, FBI, Senate and House subcommittees are well aware of these Intel Network matters reported and their implications supposed by many sources.

Key failures include the ability of leadership to register system errors which in legitimate market's leadership would error correct and regulate assuring acceptable standards of operation; in this case defined by law & Intel antitrust compliance promises. That is Federal and Competition law, competition compliance, cybernetics, best practices of industrial management, economics and the communication sciences and that defined by academics, philosophers, scientists and inventors as responsibility, and responsible science in technocracy, for those stewards privileged to hold the reigns of corporate, industry and Nation's governance standards and overall system controls.

In this case Intel has failed to correct, in fact stalled and invented every reason to disregard remedies despite understanding their errors since at least 1997. And in this instance where Federal & State agencies have investigated and have also yet to correct structural problems encompassing Intel competitive methods recognized as extra economic effects. Errors that occurred again and again, never adequately remedied, and the need for error correction remains. Those are Intel's action remedies for legitimate improvement, governance and thus return to a good corporate citizen status; for government / industry co-regulation within an operational free market including a legitimate functioning oligopoly.

For an enterprise that professes this ability of constant improvement where are the remedies? How can society register improvements if solution starts are not applied to the visible problems? For the United States as a democratic nation among nations, diplomatically, lack of error correction also fails into question. The effect of these register errors are visible to Nation's diplomats.

Everyone truly near to this case, including Intel realize it's time to admit some mistakes and make some necessary corrections. Intel market abuses have been on the negotiating

table for all too see and for some time. No one is kidding anyone else about the expanse of these violations in a meticulous study of Intel Networked antics by multiple agencies and nations. Further an industry's corporate governance failure must also be addressed for return to a legitimate governance working model that includes due process.

Subsequently, Intel Corporation's only responsible governance option is to concede to these competition violations with negotiated settlement compensating all parties injured by competition and monopoly practices that are abuses defined by law. This way Intel survives the inflection point and might even manage a controlled governance landing.

Beyond conceding to competition charges, all other Intel management options begin with bankruptcy protection as Intel has long time forewarned in its financial reporting. At this late juncture conceding is the only way to save face through an inflection point to a competition and governance recovery. Because for Intel to negate this executive responsibility is also too remain in accomplice in competition, rackets, obstruction & network crime.

From here transit to what ever end might be is only a matter of time. In the worst case Intel DNA is spread to the wind through a cascade of global country damages. In the best case competitive markets are reestablished and everything learned from this Intel experience can be put to good use to guard all markets from similar pitfalls; including for Intel.

At least 17 new and/or supporting laws have been proposed to the Senate and House subcommittee based on this fifteen year Intel analysis. I expect there will be a few more including those that address private security force's domestic operations.

Knowledge behind these insights cannot be wasted. There's more at stake here than just business, competition, governance in an operational democracy. I continue to advocate that every American must be taught how to recognize competition espionage occurring around them for the ways and means to remedy in real time and not over sixteen years time. It's every American's responsibility like every citizen everywhere else, to keep an eye out for these sorts of industrial competition and economic crimes occurring around them. That's because Citizenship in a civil society requires it; whether individual or Corporate citizen.

With Intel invented reality exposed, through validation and proofs of competitive abuse, and the veil now removed, this Intel correction can provide a significant spring board to reassert both corporate and government regulatory performance generally. With a return to the actual ability of corporations and government to perform co-regulation for sustaining best practice's; an organic regulator, that can be deployed for monitoring competitive balance accelerating into 21st century global markets.

In other words in order for Government to rely upon, and for any Corporate entity to affect the system of regulation, that Corporation better be able to prove consistent practice that ensures its very own legitimacy; by example. Failure to operate legitimately results in disqualification of that actor from participation including for self regulation. Lacking internal correction by self means, Intel has literally disqualified itself from participating in the remedies of its own defense. That is because Intel raises obstacles to those corrections.

At the highest level, Intel remedies must also consider beyond the diminutive causes of action. Because to miss on the broader issues, would limit democratic society from truly understanding the aggravated monopoly abuses and their effects on society. Network effects some might still want to cover up and there's been a lot of covering up in this case. So what are the supersets beyond the core of the competition matter that must be considered to rekindle rationalism, a return to democratic capitalism and normative industrial social values, not just for Intel but for network system management within a technocracy.

They are:

At the highest level, this Intel case represents an instance where the Merchant Laws and business practices of Corporate State, have superceded Nation's Law & Federal Power. Here governance was unable to contain illegalities emanating from a Corporate Power Complex of networked enterprise. For over ten years Federal & State agencies including law enforcement and regulatory agencies have been in a position to observe, and record Intel Network absurdities, including reversing a manipulation designed to steer investigators away from truth and toward an invented reality.

That is a constructed reality perpetuated by a Corporate Network Complex to conceal competition crime, racketeering, governance collapse and a rewrite of history positioning Corporate Network Power Complex as good despite some documentation to the contrary.

As a result, Federal Government is now positioned to reassert itself in implementing remedies within industry, markets & governance having demystified this invented reality into the components of its rational system truths.

Second, as a result of Intel manipulating government in concert with a myriad of fixers, the sheer mass of this multipoint manipulation supported a lengthily stall out not only in the regulatory mechanisms of Intel, but within the Federal and State Governments; at regulatory and law enforcement agencies touching the CIA, FBI, Homeland Security, FTC, DOJ and the National Association of Attorney Generals. And, this is why for the national defense this Intel tragedy is going to be resolved for the public, social and Nation and World good. No responsible society has the right to say no to such an opportunity for these sorts of justified improvements. Yes to implementing whole remedies is the only responsible regulatory and legitimate governance conclusion.

Third, Intel through a channel bottleneck merged into criminal accomplice with a number of PC focused Media Cartels. Based on Intel production volume and a mechanic attractor known as the Intel Inside Fee-for-Rebate scheme, these U.S. Media Cartels (Meizaru Kieretsu) planned their cash flow quarters in advance based on what they chose to push onto consumers in the way of Intel intra-platform computers too secure the highest levels of the total transport fee available from weighted rebate pools. This determinant is based on available pools of Intel rebates artificially massed & masked for a transfer fee collected by media. This practice focuses media on Intel product and can result in media throttling Intel product volume through channels to secure these fee pools more quickly. This practice limits all competitive substitutes & replacements not only in real time but in future time. That is because Media plans and then focuses most of its transport effects; that includes product coverage, accolades and editorial awards, on the weight of these skewed

masses of existing Intel Inside rebates. Rebates collected as a fee before most new values from competitive products that trickle down the supply chain naturally.

Four, this is how media secured access to an Intel point attractor in which today's PC market share leaders were virtually defined by structure. While other x86 OEM participants were systematically eliminated resulting in the accelerated loss of domestic enterprise & employment potentials. That is hundred's of domestic companies & hundreds of thousands of U.S. jobs. That consolidation occurred on an accelerated time schedule and not in real, organic or rational time. Obviously competitive logic in normative markets needs some redress here. And that's because economic espionage is a nation's treason.

Further, some of these media outlets were prominent harbors for espionage, information theft and rackets, and through their power of communication; as propagandists, again & again covered their tracks to dissuade their Corporate targets, and to manipulate government investigators of their ongoing acts of a monopoly bottleneck; systematically limiting domestic and public traded corporations for the purpose of artificially accelerating a shift in their sales revenue toward Intel network values.

Here some media in proactive acts manipulated consumers toward outcomes that were planned while using the front of journalism to conceal their Orwellian intent; a systematic attractor that causes Media to sell Intel CPUs in certain PC brands representing a majority of these weighted pools that shifts the economic value of other PC companies to Intel scale to grow these pools even larger. Media takes their fee in the process from Intel for participating in this transport act which is an extra economic concentrator. One question is whether the fee; approximately \$5 to \$50 per PC, is passed onto the consumer as a cost in the price of the CPU or PC (since discovered disclosed in financials). Regardless the act is illegal under the Sherman Act in accordance with multiple cases.

Here are just two of them:

United States v Nat'l Assoc of Real Estate Brokers

"The term labor as used in the Clayton Act is not limited to the work of manual laborers. The government contends that the defendants have combined to fix real estate (Intel Inside) sales commissions to be charged by real estate brokers (Intel Inside PC Publication Partners) . . . the government urges that this activity constitutes a violation of the Sherman Act. *The government contends, however, that irrespective of whether it is reasonable or laudable, the fixing of commission rates is illegal per se and constitutes a violation of the Sherman Act.*

Northern Pacific R. Co. v United States

"Tying arrangements flout the Sherman Act's policy that competition rules the marts of trade. By conditioning his sale . . . a seller coerces the abdication of buyer's independent judgment as to the tied products merits and insulates it from the competitive stresses of the open market. *Thus is the usual case only the prospect of reducing competition would persuade a seller to adopt such a contract.*"

Since 1993 the entire PC market has been rigged in this way managed by some in the

PC Media. Byte Magazine, a McGraw Hill Publication, stands as the sole hold out.

Horizontal x86 and PC market share outcomes are the result of Intel system mechanics based on competitor limiters, production allocation, weight of surplus rebate pools and communications controls. In the weighted sense of Intel structure the way market share played out through value distribution, outcomes in the x86 PC market have a lot less to do with natural demanders and much more to do with how Intel Media Power Complex consolidated system player's using field effects. There has been a decisive systems manipulation. Where multiple levels of non organic assembles of clock works alter our society and culture away from normative values toward an Intel Network enculturation.

In this instance Media consolidates PC system players outside and then in Intel's dealer group, while on the other hand Intel & Media limit other horizontal x86 CPU competitors aimed to save those gone beyond Intel favor. There are cases where PC companies literally begged Intel's horizontal x86 competitors not only to resist Intel, but for product to offset that withheld by Intel given that individual firm's competitive purchase rights.

Imagine Orwell's 1984 ten times worse and you've just begun to get the whole picture. And that is bound to continue into the future, accept that, remedies are coming in these Intel Network case matters. That is because any other outcome is unacceptable for the National Defense. Unbridled monopoly leads to rackets and at that point of governance collapse industrial spies see industry wide open for their entry. That door was left wide open across x86 microprocessor and proximate enterprise. That result was preventable. And that result is devastating. And that result is also still to see its legitimate governance and judicial conclusion.

Those who disregard these facts are no less guilty than the Intel Network. Those who disagree should spend some time freeing themselves from Intel Network myth by deciphering the working components of Intel system structural realities. Free from myths prece-
dence has in fact won. That is because Intel myth cannot overcome credible evaluation of their monopoly violations seen in legal precedent, system structural attributes and that which defines responsible science in technocracy currently. And, I would expect, in economics and industrial management as experts in competitive economics & industrial management further lend their expertise to the evaluation.

Fifth, solving the Intel matter, will resolve process and system failures associated with Corporate Control of law enforcement to obstruct justice where they would target individuals who monitor for regulatory performance. There will be no more targeting to defame and lay destitute individuals engaged as a civic servant, or government employees who through their exposure to the workings of organized crime operating within corporate enterprise, media, government, Nation, attract partisan police and political action to silence them. Especially in instances where partisan police and political action is secured through Corporate misrepresentation of an invented construction discovered. That is found out.

Urgently, what's become understood from this Intel experience must be understood by all Americans as a fail safe to prevent this kind of nationwide governance collapse. That way every American will be capable of deciphering the patterns of *competition* espionage oc-

curring around them knowing how to report it for remedy in real time & not over sixteen year's time. Any other outcome is ludicrous.

I believe Washington will in fact deliver remedies for real competition, governance and homeland security. If not others are positioned to do this and to define and take control of the Intel social industrial losses for their recovery and distribution.

Enterprise crucial for homeland defense in an environment that began with competition violations leads to racketeering, espionage, constitutional, human & civil rights violations. Criminal forces have demonstrated their ability in this Intel case to manipulate State and Federal investigators away from those crimes. This manipulation has been documented. Those crimes will be remedied because the alternative is unacceptable for Intel, industry, competition, society, constitution, citizen human rights & Nations defense.

Respectfully submitted,

Mike Bruzzone
Camp Marketing Consultancy

The following is the sole opinion of the author available for publishing in whole or part.

This treatise is based on 10 years of field, primary and secondary research including for the Federal Trade Commission and California Department of Justice.

For point counterpoint, please contact the author at campmkting@aol.com



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Bureau of Competition

JAN 10 2007

Mike Bruzzone
Camp Marketing Consultancy
6000 Park Avenue
Richmond, CA 94805

Dear Mr. Bruzzone:

Thank you for your letter to the Federal Trade Commission regarding your concerns that certain practices of Intel Corporation violate antitrust laws. Congress has empowered the Commission to prevent unfair methods of competition – pursuant to Section 5 of the Federal Trade Commission Act¹ – and to prevent mergers, acquisitions, and certain other practices that may substantially lessen competition or tend to create a monopoly, in violation of the Clayton Act.² These federal antitrust statutory prohibitions are intended to ensure that the marketplace provides consumers with a choice of products and services at competitive prices and quality levels, free of artificial restraints on competition.

Your correspondence has been forwarded to appropriate staff members within our Bureau of Competition, and I can assure you that the information you have provided has received careful consideration. The Commission remains steadfast in its commitment to eliminate collusive or other unlawful anticompetitive practices.

We appreciate your interest in this subject. Again, thank you for your letter.

Sincerely,

Alan J. Friedman
Attorney
Office of Policy and Coordination

¹ 15 U.S.C. § 45. In addition, although the Commission does not enforce the Sherman Act directly, a violation of the Sherman Act also constitutes an unfair method of competition that in turn violates Section 5 of the FTC Act. *See, e.g., FTC v. Cement Institute*, 333 U.S. 683, 690 (1948).

² 15 U.S.C. §§ 12 *et seq.*

November 1, 2001; ACLU 3rd ANNUAL UPDATE - the invisible threat of terrorism isn't so invisible.

To: Senator Diane Feinstein; Judiciary & Intelligence Committee
Senator Fred Thompson, Government Affairs Committee
California State Attorney General Bill Lockyer
United States Senate; Brief on Planning for Change - 6th in Monthly Series.
American Civil Liberties Union; Annual Update - US v Intel, FTC Docket 9288

Cc: SIA & Semi CEOs
Attorney General John Ashcroft, Department of Justice
Chairman Charles James, DOJ, Chairman Timothy Murris, FTC
NAAG Antitrust & Consumer Protection + Honorable Tom Miller
Director George Tenet, Central Intelligence Agency
Director Tom Ridge, Homeland Security
Joint Chiefs of Staff & Secretary of State Collin Powell,
Vice President Dick Cheney & President George Bush

Fm: Mike Bruzzzone
Camp Marketing Consultancy
6000 Park Avenue
Richmond, CA 94805
campmktg@aol.com

Re: **December 2001 Edition of Art & Science of Camp Marketing Brief:**
- Introduction: Continued analysis of the x86/PC social order; era of reformation.
- Criminal infiltration into the tech industry; what industry & government have not entirely acknowledged publicly & have seemingly pursued at great lengths to conceal.
- Elimination of domestic competition in the name of international trade protection.
- First and second waves of domestic economic dismantling.
- Some we can forgive but we should never forget.
- Intel in summary.

Senator Feinstein, Senator Thompson, State Attorney General Lockyer, members of the U.S. Senate, SIA & Semi CEOs regional and executive directors of the American Civil Liberties Union, Honorable John Ashcroft, DOJ & FTC Chairs, Honorable Richard Blumenthal, Eliot Spitzer, Betty Montgomery, Drew Edmundson, Hardy Meyers, Tom Miller, CIA Director Tenet, Joint Chiefs, Secretary of State Powell, Mr. Vice President and Mr. President:

As corporate deception kindles catalyst for civil tension throughout world society, as my plight for justice and civil liberty intensifies under the vale of an administrative plus legal system failure including concealment, Camp Marketing Consultancy has chosen to dedicate this 7th in a monthly series on Competing in High Tech Product Categories; Planning for Change, to continuing analysis of the x86 microprocessor and personal computer social order. Requirement for its reformation from a pre-ricardian economic model; reliance on CPU surplus rackets, unnatural

November 1, 2001; pg 2

product obsolescence, network system over accelerations, artificial trade barriers and unnatural channel bottlenecks, to reinvention toward a modern, democratic and efficient industrial social engine.

Beginning with technical enterprise and encouraging movement toward management best practice. Rediscovery of the lost values of corporate excellence based on good citizenship in a world community. Of utmost importance, the right of corporate citizens, who are also U.S. citizens, to be free from mafia controls within technical and other enterprise. Criminal infiltration into enterprise, ties to executive management, corporate security, for deception of law enforcement, enlistment of rogue agents, exposure of employees to the dire influences and unbridled effects of their covert plans.

A result of x86 microprocessor and PC industry infiltration by domestic organized crime. Mafia infiltration into Intel, AMD, Cyrix, the Ziff Davis Publishing Company and others. Where this open door allowed entry for geopolitical industrial espionage into our domestic semiconductor and computing industries. And where administrative failure at the Department of Justice and Federal Trade Commission have allowed these networks to tighten their control on legitimate enterprise while apparently securing greater control within government. Quite frankly this must be stopped. Intel and Microsoft constituent network manipulation of social system's including their ability to influence government, Washington in particular, are the two leading examples.

- Criminal infiltration into tech industry; what industry and government have not acknowledged fully in public & have seemingly pursued at great lengths to conceal.

Specific to Intel and for reference to a known environment, anomalies similar in some ways to those hurdles associated with the design, development and prototype manufacture of Concord; Concordski, which I am certain will make environmental anomalies associated with the development and unnatural growth of the Intel Business System and Power Complex; Intelski, appear mild in comparison.

Mild when criminal anomalies over an eleven year Intel production ramp, across fifth and sixth generation processor architectures, are more fully revealed by democratic government. Ultimately based on calculating the total welfare loss to our society, as a result of intellectual and economic theft stemming from criminal involvement to systematically guide concentration of the Intel monopoly. Including illegal dismantling of numerous competitive inventors and innovative design manufacturers across our domestic semiconductor and computing industries. Premature demise from a planned industry 'constituent' concentration, not a natural consolidation, as a result of a hidden war for geopolitical control of these industries. A war criminal elements have profited by, above and beyond that of most of the stockholders of these firms, with very little return, in fact great loss, for our society as a whole.

As judicial modifications are made, I trust from a laissez faire to regulated environment, stockholders of these companies should understand much of Intel's corporate gain over the last eleven

November 1, 2001; pg 3

years was illegally secured. Unknown to the vast majority I am sure. So be happy with what we have gained as a result of this national learning experience. However, understand that we cannot expect the same methods of financial growth to benefit us in the future. For that would be a continued treason, more specifically, economic espionage based on the Intel methods; reverberating surplus, zero-sum production methods, system accelerators and limiters used.

Also, do not associate my Concord supersonic transport development analogy with Russia or the Soviet Union. In addition to the influence of domestic organized crime in x86 surplus markets and PC media channels, their existence providing no less than a license to be lawless, at least two sources have offered what I consider to be other offerings. As a business analyst covering highly charged issues within industry, similar to attacks on my person, contributions can come from indirect sources and sometimes through unusual mediums. With that disclaimer, specific to my red depiction in the October National Association of Attorney General's Edition of The Art & Science of Camp Marketing brief, two sources suggest another, much smaller European country, as a prime culprit operating covertly within our domestic semiconductor industry. I can attest personally to IP theft associated with former x86 top executives and Asian corporate influences. Widely known theft of intellectual property from Cyrix, Digital, Intergraph and National by Intel.

- Elimination of competition in the name of trade policy.

None the less, and regardless of their actual handlers, both internal and external factions have contributed to the mess made out of our domestic economy. Preventing economic contributions by a large number of innovators over the last eleven years. Based on dominant fabricator reliance on over production to hold distribution channels, over accelerated technology product introductions lacking buyer utility, monopolistic extensions, limiting production duration's for codevelopers; unnatural obsolescence, channel barricades and a host of system's manipulations and field effects; attractors through limiters. Strategies and tactics relied upon for too long by industry stuck in a feudal state. Feudalism that must be met with reformation and process reinvention. And, in the opinion of this analyst, judicial action. Action to clean out the criminal networks operating from within multiple technology corporations. Networks which have demonstrated a history of deceptions to disrupt our country's ability to generate economic renewal. Deceptions for which evidence exists, moves have been recorded, studied, and are known.

Initially as a result of Silicon Valley industry pursuing an unsung and highly illegal trade protection program. A program initially managed by technocrats, I am sure with every good intent, that was quickly taken over by organized crime with the key objective of whittling down the Intel monopoly on their own terms, unregulated by government, *which prompted cascade failure*. Failure across industries, government and apparently process failure among law enforcement. Much of which was concealed by an invented reality deployed by the primary perpetrators operating from within Intel Corporation and the Ziff Davis Publishing Company. An invented reality validated by their business, financial, legal, communication, political and police networks. In total, a systematic economic attack on the United States by organized crime, that has been concealed by technocrats and their network associates stuck in this system of terrors.

November 1, 2001; pg 4

Setting aside international ramifications, a domestic failure resulting from the destruction of much of our country's inventive computing foundation in order to sustain its largest fabricators, channel distributors with no inventive capability, and most abhorrent, media channels. Where the term advertising economy is media propaganda to hide an economic cost extractor not an economic generator. And where the agent of domestic expansion is not the capitalist, but always the innovator and inventor funded by available capital.

- First and second waves of domestic economic dismantling.

In a first wave, since 1993, investment capital has been siphoned through channels to media by way of the Intel Inside contract rebate handling fee (RICO 1961, Articles 222, 1957, 1341). This rebate/fee (fidelity rebate) arrangement is based on the Intel Inside program contract, a Sherman Act Section 1 violation, resulting in a system's program that skews unnaturally large amounts of ad funding to Intel's primary PC dealer group. All the while limiting other integrators, excluding and suppressing alternative platform competitors.

Ad pools secured from Intel industrial CPU production grow to unnatural levels over time, as Intel's first tier dealer combination unbundle Intel Inside rebates from CPU purchases in excess of user demand. Purchases in excess of end market demand in order to secure first mover advantage and Intel Inside marketing fund leverage. Upon selling CPU (reverberating) overage into the Intel surplus market (pit), and there's a lot of it for a fabricator that has typically over-produced end user demand, they are resold by Intel's primary dealer group sans the Intel Inside rebate.

The unbundled rebate now limits competition while simultaneously transforming into and Intel preferred dealer media attractor. A system which provides the communications shipper a field effect promoting push. Including a reward, an end of life surplus generated kicker, for a job well down through any one CPU production phase. In turn this kicker acts as a springboard for the combination's next Intel intraplatform PC production ramp. This system's manipulation is partially responsible for the demise of Cyrix and its OEM cluster, DEC/Samsung Alpha, Intergraph/Silicon Graphics MIPS, dismantling of AMD, suppression of Apple moving toward Sun Microsystems to name a few.

First tier dealer ad pools are subsequently skewed to become a gravitational attractor for media sales preview. Encouraging direct sales by media vehicles; vertical routing with all of its effects on the quality of journalism, in relation to Intel direct PC dealers (Clayton Act Section 3, RICO 1341). Notably, ad pools supporting any one Intel processor speed grade are not secured by media until 100% of the surplus clears the pits. This lag, the kicker, suppresses horizontal CPU competitors and alternative platform providers extending to their new product and platform introductions. Media being much more interested in clearing 100% of their existing Intel Inside ad pool from prior Intel CPU introductions, including surplus, compared to securing a slice of any new natural values trickling to them from advertising and marketing means associated with Compaq-Samsung Alpha, AMD, VIA, Transmeta and National Semiconductor x86 OEMs, and in relation to marketing expenditures supporting new product offerings emanating from these Intel alternative platform enabling clusters.

November 1, 2001; pg 5

In a second wave beginning around 1996, capital was transferred from our economy by some venture capitalists and investment bankers, by way of their dot.com accomplices, who were talked into media sales preview as a method to commercialize internet redistribution channels. When media sales preview as a method to commercialize is a known strategic error, a cost, which cannot commercialize. This myth, in this environment and in conjunction with other programming methods, quickly resulted in these preview funds being pooled and carted off by some of the media. And there are some in Silicon Valley who have attempted desperately to hush this up. In the opinion of this analyst, the system's siphoning of development capital by media represent a first and second wave of economic attack; espionage, against our domestic technology capital market.

So here we have two ways our country misplaced five years of economic growth, originally generated by more traditional industry participants, siphoned off from industrial manufacturers and individual investors, through VCs and many of their dot.coms, summarily stolen by channels and primarily the media. Beginning with Intel and the Ziff Davis Publishing Company, spreading throughout PC trade media, and knowing no media boundaries today. Every publication, web site or broadcaster who accepts an Intel Inside rebate, where you see the Intel Inside logo followed by the Intel Inside jingle, is essentially in per se violation of the Sherman Act and always has been.

Subsequently, when we read about the ad industry slump, realize that their bosses and handlers in media channels are the culprits who sucked the life capital out of our manufacturing sector. No wonder there are few really new high tech products to advertise. Major reforms and new laws must be applied to these industries. Camp marketing has suggested several (see brief).

Just as annoying, and in relation to the dot.com bomb, is that some of this industrial capital was lost by venture conglomerates. Some of whom described their business models as kieretsu. Kieretsu, a sort of dealing combination were mentioned in Camp Marketing Briefs in relation to Ziff Davis as early as 1996. And were again reported on in May 1999, noting their outlaw by the United States in 1945. I trust we now recall why.

Systematic, structural, planned economic attack is a meta component of warfare in escalation. Economic followed by physical attack, terrorist or otherwise, are progressive compliments of chaotic society under pressure from the inside and outside. Through an eleven year period where captains of our domestic x86 and PC industries, and VC old guard, had the knowledge and power to stop it.

Because the primary corporations, and even the individual's responsible, have always been known. Instead, industry, extorted by channels and media in specific instances, choose to conceal these terrible crimes. They did so by pronouncing Cassandra, one of the few analysts brave enough to report on this subject, as a heretic. All so that Camp Marketing's painted prophecies would be ignored by a government preoccupied with what appeared to be natural industry and economic growth. When in fact these artificial growth accelerations reported on in Camp Marketing Briefs were providing a method of capital pooling, followed by the confiscation of these pools and their theft. Theft in the form of media profit at the expense of innovative investments by real industry aiming for domestic economic renewal.

November 1, 2001; pg 6

Both a failure and a learning experience, as a result of the inadequacies of a handful of men, in looking out for other than their own interests. Interests which denied the needs and protection their power positions demand of them as captains of enterprise, stewards of intellectual monopolies, in relation to patent rights and fair competition, extending in the semiconductor industry to further lithographic enablement by DARPA, and in relation to the social return these and every domestic enterprise owes each and every American. That which is precious and must be guarded in our open society.

What really disturbs me in light of attacks on my person; both psychological and physical, is that when government employees, including service men or women, are captured and tortured by foreign political regimes they're respected. Treated as heroes and even more so when they have the gumption and courage to talk about their experiences.

Other Americans, are respected and honored, when they find themselves in the extraordinary situation of having to thwart hijacker terrorists, the fulfillment of an espionage mission to ram commercial airliners into domestic ground targets.

But when a gay man pursuing Intel competitive program's management discovers organized crime infiltrating into his x86 employers through the Intel media network, followed by the disruption of these employers by the same individuals; followed by their acts of theft, espionage, violations of antitrust, corporate practice appears simple enough. Through a ten year period individuals who discover and report these incidents to management are positioned as unbelievable, set up and pushed under.

Except that I'm still swimming. And swear I will see this matter through to it logical judicial conclusion. Do these writings really need to extend into areas which include how the mafia was developing a false personal profile; the 1993 contraband set up, how I was hazed, methods used to drug me, their physical assaults, their photos, their programming methods? The strategies and tactics of corporate confidence men to induce psychosis in their mark. And of course, to disrupt the administration of justice in US vs Intel. Through the period of my invited input by the Federal Trade Commission on this seminal antitrust case; the compliment of the Microsoft case.

A grand strategy by organized crime to conceal industrial espionage and anticompetitive conduct. Not only so Intel corporate security could justify their make believe risk assessments. But also so organized crime and their corrupt executives could conceal the degree that they have infiltrated, and have influence over, our United States Government. To hide their proximity to our elected and appointment representatives. To conceal their influence plans. To disrupt the administration of justice, our democracy, its political body and laws.

And what has the administration, the FTC and DOJ done to correct this situation? The answer is not enough. Network system's manipulation of government and government officials by an infiltrated industry through their hooligan's continue today. Criminal effort destroying the economic growth potential of our country. Every American should be made aware of this fact. A temporarily up stock market is not an indicator. Legal, economic, system, social and industrial manage-

November 1, 2001; pg 7

ment proofs of monopolization are the only rational indicators. And by all historic indicators the worst of this economic crisis, caused by out of control industry, is yet to come. See 6th brief.

- Some we can forgive but we should never forget.

Through the period of this learning experience, between November 1991 and November 1999, and to date, and with each of us in industry now more aware as to the foundations of our unfortunate circumstance, I will extend to these other men, now more fully comprehending the downfalls of runaway enterprise, my acknowledgment that they undoubtedly were driven by fear to comply. If not to cover up. There is no doubt that legions of criminals took part in and lead many of these illegal initiatives. Members of corrupt subsystems within technical enterprise extending to their proximate networks. Which based on this analyst's experience are extensive, in tact, and in cases maintained by massive infiltration's into these firms from within human resources, marketing communication's and their media agents.

Promoting an environment where Chairs and CEOs of high tech companies comply with power complex effect, in my opinion not only from growth beyond their means to control, but also from fear. And not just the fear of corporate loss in any one quarter. But for fear of their reputations, their careers, perhaps even their lives. Because as my own experience has shown in penning Camp Marketing Briefs since 1995, including management and consulting positions at Orchid, Arche, Cyrix, ARM, NexGen, AMD, Samsung and IDT, since 1987, criminal forces within and around the x86/PC industry are to be feared. Their methods in a lawless environment are brutal. Wake up with a representation of a bullet under your bedroom door, knowing that they're in your home, threats of poisoning, phone taps, computer hacks, trails, and a more accurate reality of the x86 microprocessor and PC industry reveals itself.

I've been threatened and stalked for years now. Late last year, a prominent and well regarded financial analyst received death threats after lowering his earning's estimate on Intel. Now, a state attorney general is being threatened. Where does it stop? Isn't time for government and the judicial branch to step in and stop it? In this analyst's opinion there needs to be open congressional hearings. The FTC was caught in an administrative failure. The DOJ appears to be going down that same path. Why?

- Organizational Elephantiasis

Note that these criminal networks are very visible operating within industry. Their field effects give them away. It all gets down to knowing where to look and knowledge of our antitrust and racketeering laws. And most important, whether the FTC and DOJ are minding them. They did not mind them in the most important cases under the prior administration. It took NAAG to do that and solely in one case; Microsoft, which is the direct compliment of the Intel case.

For an example of the simplicity of visible field effects lets consider another industry; retail gas sales. Last month the ARCO price between Richmond and Mill Valley, California, reflected two price spreads; \$1.59, 1.69, 1.79 in Richmond, \$1.79, 1.89, 1.99 in Mill Valley. I was aware of this for about a week, after which, ARCO Mill Valley split the spread at \$1.69, 1.79, 1.89. I

November 1, 2001; pg 8

imagine it might cost more to ship gasoline from Contra Costa to Marin County and across the Richmond - San Raphael Bridge. These ARCO stations all have easy freeway access.

Specific to freeway access, ARCO reveals more. ARCO has been refurbishing Richmond stations with freeway access on the fringe of the Richmond, Marin County regions defined by commute traffic. Some of these stations are opposite local independents. Thus, ARCO is locating Richmond stations, with lower prices, in Chevron and Union territory adjacent to Marin access. Acknowledging price drops, a number of new hallmarks, there must be a lot of gas. Recognizing how ARCO is playing the fringe between Richmond and Mill Valley, tells us something about ARCO, Chevron and Union 76. Its that simple.

- Intel in Summary.

In summary, and as a prelude to the accompanying brief, from the standpoint of industrial trade protectionism, we have allowed monopolistic and quasi monopolistic industry to grow unregulated. Beyond their organic capability to sustain themselves mechanically through legal means.

Where gravitational mass achieved through monopoly extension, unnaturally fueled (in the case of Intel) through over accelerated growth phases, illegal field effects, juxtaposed dealing combinations, x86 industry wide surplus racket's, channel barriers, both promotion, consumer manipulation and regulatory concealment by media propagandists, has brought our nation organizational elephantiasis.

Elephantiasis which has crippled some technical fabricators who are now addicted to their monopolistic ways which have transformed toward criminal. Toward illegal methods of sustaining their growth, while disrupting embryonic inventors and enablers of new physical wealth; the combination of intellectual property and commodity materials into the components of high value products. Where innovative seedlings of product renewal in our country have been disrupted and stalled out for eleven years. So it should be obvious why our country is economically challenged today.

Where the formation of criminal subgroups within enterprise are often a result of parallel executive compensation systems (RICO 1961, Article 222) horizontally between two or more corporations. Superimposed on top of vertically linked incentive programs within each of these corporation's themselves. All of which need modification for positive change in a technical reinnovation phase.

A catastrophe for some enterprise having grown so large they can no longer support themselves naturally. And where some of their most senior executives have turned toward unnatural means to achieve their compensation incentives and their corporation's objectives. And in doing so have teamed themselves with some incredibly criminal operations. Criminal operations that have substantially disrupted the possibility of near term economic growth in this country.

Where the existence of innovative and complimentary industry, that which has not been dismantled, is now an even greater prerequisite for growth in what remains of our domestic computing industry. Growth for both hardware and software developers attempting to reinvent economic

November 1, 2001; pg 9

renewal through a period of precarious equilibrium. Production transition from a mature channel driven PC industry, to multiple new and complimentary computing paradigms requiring the skills of inventors, innovators, manufacturers, available capital to produce and market relations; not marketing.

And where many of these skills and their proponents in established enterprise, were lost or displaced by criminal networks through key operatives running human resources. All through the growth phases of the charter PC paradigm followed by the dot.com bomb.

Where there is a very fine line between competitive complementarity and complementarity gone corrupt. A state in which inventors of technical wealth, the basis for economic renewal, are consumed and eliminated before their contributions to society can be realized. And where the economies of scale required by large fabricators often prevent them from introducing similar innovations, sometimes taken years earlier, that the victims could have offered on a more timely basis. Thus insuring more timely introduction and manufacture of potential growth products much earlier. In a nation where the myth of dominant enterprise, big is better, poses a hurdle for fledgling companies through mid-cap manufacturers. A hurdle for new growth products whether substitutes, replacements or innovations.

Where x86/PC industry; semiconductors of all types, hardware components and software have seen a shift from red to blue. From open, lit, growing, breathing, expanding. To closed, dark, gravimetrically verse complimentary attracted. Toward collision and now contraction. Promoting a massive disruption in the process of independent invention and technical enablement, manufacturing disequilibrium, and in the x86/PC market promoting the counter growth polarities and consumer trade anomalies associated with resonance from an existing channel surplus market resisting industrial production reset. This compounded by a wane in end user demand for PC platforms carrying an Intel monopoly price premium in relation to buyer utility. And in cases where such system's do offer utility, against too many PC OEMs moving too quickly through the 'slim' work-station buffer zone into limited volume enterprise space. And where their CPU surplus operations make it difficult for these corporations to compete in consumer sub \$500 PC appliance categories.

Due to these anomalies, including the existence of unnatural system structures maintained by men, industry attempting to move toward reconfiguration and re-ignition cannot swing through absolute rest. And remains in a precarious state where industry has been snapping back toward disruption at almost every push of the reset button for over two years now. A lot of this has to do with Intel field effects. A lot of this has to do with the Intel surplus market. A lot of it has to do with the Intel network who deliberately concealed and disrupted the administration of Justice in FTC Docket 9288; US v Intel.

For members of the American Civil Liberties Union who have followed Camp Marketing's annual briefings of October 1999 and 2000, and would like a more complete update on Intel, AMD, Cyrix, state of the x86 market including information that can be related to MicroSoft, please contact your State Senators or Attorney General. Ask for the Art & Science of Camp Marketing Brief,

November 1, 2001; pg 10

Planning for Change, five editions in a monthly serial alternating between NAAG and Senate members; June through October 2001.

The November brief and one of ten pages from the complete sixty page foil set; mostly talking foils, speakers notes; a quick read, have been included for your reference in this correspondence. This work is a continuance of Camp Marketing's effort to cultivate awareness of technical industry practice, management issues related to public policy for government. This works stems from my March 1998 invitation by the Federal Trade Commission, Bureau of Competition, to input on US v Intel; FTC Docket 9288.

For the first time in this correspondence, violations of my civil rights are noted in detail for those ACLU members who have written back stressing their importance in relation to assistance in this matter. A foil is included which summarizes Bruzzone v Intel, Stock & Does; Santa Clara Superior Court Case # CV 779409. A second foil summarizes US v Intel.

Camp Marketing Analysis for economic renewal in America, Democracy and Civil Rights
Sincerely,

Mike Bruzzone
Camp Marketing Consultancy

February 27, 2001; 2009 Congressional Release 11 of 20 – Collect all 20

To: National Association of Attorney Generals

Cc: John Ashcroft, Attorney General
Charles James, Department of Justice; Antitrust
NAAG, Antitrust, Consumer Protection
Judicial Committee and Government Affairs
Collin Powell, Secretary of State
Dick Cheney, Vice President
George Bush, President
Interested Parties

Fm: Mike Bruzzone
Camp Marketing Consultancy
6000 Park Avenue
Richmond, CA 94805
campmkting@aol.com

Re:

- Technology Advisory Council to the President.
- Thoughts on high tech slowdown and duration.
- New map & common trade terminology for Intel market barriers.
- SEC disclosure and reporting amendment.
- Competition Policy Agreement.
- Computer model of the Intel system's structure.
- Human rights.

Honorable State Attorney Generals:

Following Camp Marketing's February 7th correspondence to President Bush on checks, balance, and the advantage of encompassing reference from a move toward equal representation between Intel and non-Intel 'camp' participants on the **Technology Advisory Council to the President**, this correspondence provides added mapping of market barriers maintained by the Intel Power Complex, it's cross connected subsets of horizontal dealing combinations and cartels. To further articulate characteristics of Intel barriers, in common trade terminology as a foundation for international reference and dialogue, areas historically regulated by vertical *zaibatsu*, *gyokai*, *horizontal kieretsu* and *meizaru kieretsu* are now defined on an updated industry, channel and market structural diagram. These will be reviewed further on in this update.

I'd also like to offer thoughts on the economic slowdown, duration, and in a technical environment where Intel knows there's advantage in creating confusion. Understanding that Intel Network often reverses the obvious to conceal their motives, moves, and an accurate

National Association of Attorney Generals

Pg. 2

situation assessment. We'll break through some of that confusion by considering Intel indicators and environmental factors causing the PC slowdown. With that Camp Marketing will take a stab at predicting when the PC market in all its categories will kick back into gear.

For the first time and expanding from Camp Marketing's traditional Intel Business System focus, this correspondence will break new ground by offering brief thought on amendment to SEC disclosure and reporting requirements. Recommendations are geared toward technology virtual networks and intended to provide individual investors more complete information for better decision making. Disclosure so that one might assess business viability through a more thorough disclosure of corporate intranetwork relations, associated strategy and impact on corporate sustainability. Camp marketing hopes to take some of the guess work out of deciding whether, and when, technology industry IPOs become stockholder fraudulent given known constraints imposed by industry coalitions and networks.

Finally, this correspondence will touch on Camp Marketing's endeavor to cultivate understanding of the Intel monopoly, impact domestically and internationally, to prepare ourselves for negotiated development of an International Competition Policy Agreement.

The world is watching. Intel is known as an abusive monopoly despite this fact being hidden from the general public. On the international level, among industry veterans, informed parties, Intel antics are like scars on the negotiating table that cannot be hidden.

I'll begin with the high tech slowdown as it paints a situation analysis for this correspondence generally. Over the last two months analyst's everywhere chimed in on their best guess as to the duration of the tech industry slowdown. I, too, and as far back as December estimated a one year slow down based on Intel surplus. With things looking up in maybe two quarter's time, given traditional Intel methods, squeezing product down channels through rebate and fee arrangements incenting juxtaposed dealing combinations.

The slow down being evident from information contained in the Happy Holiday's from Intel Corporation foil provided just before last Christmas. Where it was clear that Intel knew about the slowdown at least a year prior, and as early as the fourth quarter of 1999. Seen through a dip in PIII demand followed by Intel producing at their marginal revenue line for four consecutive quarters, sustaining an average competitive price through 2000 which is very rare, if not an anomaly for Intel.

Accordingly surplus production supported a more traditional Intel strategy. Jamming another three to five million units or so of PIII into the open market during this time period; topping off supply. Set up for building P4 industry channel price support, to top off

National Association of Attorney Generals

Pg 3

Combination 'Intel Inside' ad pool's and in preparation to fund acceleration of P4 down an unnatural and systematic Intel channel structure.

To fund the Intel magneto.

Where media juxtaposed to OEM dealing combinations clears PIII surplus for rebates and fees which also pays for pushing P4 onto the market. A cartel method too support excess capacity and to dump PIII surplus through a production transition. *Management which shields introductory P4 intra platform price; sales channels & product preview from intra platform competition for both domestic PC product and foreign imports.* A primary method of predation by Intel to undermine domestic x86 CPU competition. In turn too cripple our technical economy and to harm consumers.

So, traditional Intel methods to suppress competition and rig markets by funding channel bottleneck to protect their industry monopoly unnaturally. Through a period where x86 enablers are becoming more integral in their platform developments. Moving to platform replacement's in order to differentiate offerings in ways attractive to consumers, and as a result of having to get around intra-platform restrictions imposed by Intel. Despite the utility value of x86 CPU substitutes to consumers. And where intraplatform restrictions imposed by Intel has held x86-based inter-platform design and development back and for at least five years. A period in which first x86 based network client prototype appeared, associated with Cyrix Media GX, which was then naysayed and deposed by the Intel Business System. Compare Media GX reception to Intel Atom reception today.

Where MediaGX and other non-Intel product was naysayed, primarily by channels, given their fear that PC's containing these competitive CPUs would impact their Intel-based PC sales and marginal revenue potential from both legal and illegal Intel value streams.

Dominant computing companies like Intel are now attempting to capture enterprise markets. A financial springboard to pay for consumer platforms like Media GX now owned by National. Where the traditional big PC company view has been that it takes the first to pay for the second. Given the sequential nature of PC platform displacement in relation to sustaining sales. And where the PC has now eaten its way up the performance curve through slim unit workstation buffer zone, leaving the Intel intraindustry PC its final foray to displace inte-rplatform enterprise server. The last battlefield before total category fragmentation including development of home server and all its attachments. Home server; both a network client and home server, sometimes referred to as a hub, or gateway, a robust, high performance consumer connection to internet entertainment and communications. The hub of Intel's vision of 'ubiquitous' computing. The next mass market PC upgrade. An opportunity that's up for competitive grab so long as Intel and its combination mind their Sherman's and Clayton's.

National Association of Attorney Generals

Pg 4

So with one year PIII supply and five years of competitive suppression let's estimate the duration of the Intel downturn. Beginning with a chasm that is a direct result of Intel stifling alternative design and development other than for their own platform. Beginning with AMD decades ago, followed by Cyrix, leaving those who remain to catch-up on the whole components of replacement platform design and development. Independent design manufacturers constructing new x86 & other design development tracks, some enterprise, some for consumer, and all too late in relation to sustaining domestic manufacturing and PC sales potential through this Intel drought.

Proceeding accordingly the question remains whether alternate enabler's; AMD, National, VIA, defunct Cyrix and IDT, lacked network power in the primary x86 substitute CPU market, and whether lack of power as a matter of law inhibits the possibility of market power in x86 platform replacement's market? Given Intel disruption of alternative x86 and other interplatform developments that include combine systems structure too regulate Intel sales over a nine year period, through the entire PC market growth cycle, that answer is obvious.

Competitors were held back unnaturally, with methods that were unnecessary in relation to the promise of Intel's natural x86 monopoly and business acumen. Since 1991 Intel has always been an abusive monopoly in systematic concentration by its network participants; in total the Intel Zaibatsu. Nothing can hide this fact.

Alternate enablers could have completed development of critical new platforms eons ago. Platforms that could have been in manufacturing and sales channels today. Instead many remain on the drawing board, or are in the early stages of development and deployment. Some were lost forever. And those who do remain are now under the added constraints of an Intel drought and PIII dumping. I'd suggest that the somewhere up to fifty billion dollars or so that Intel deprived our society of (based on antitrust 3x), through its monopolistic inefficiencies and anticompetitive practices, could have funded catalyst for alternative invention on the grand scale both here and abroad. Stalled out, disrupted and pulled back by Intel, the Intel Combination and the Intel Power Complex. We are now feeling the brunt of that monopolization. Observation of the upstream & down stream ripple effects make the epicenter of this technical downturn apparent.

So it's down right laughable when you read in an Intel press releases that a slowing U.S. economy caused their PC combination slowdown. The Intel system's structure did however run out of consumer demand for the marginal utility provided by their intraplatform offering prompting an economic downturn across high technology. In relation to buyer utility PIII intraplatform demand has essentially been filled, PC displacement has moved to the slim unit but highly profitable enterprise space; not profitable for long if Intel get its way, with Intel disruption of doodads and whizzes that could have attached to Internet servers, now that a server slowdown is in progress too, and only if all those home hubs

National Association of Attorney Generals

Pg 5

and their consumer appliances existed today. And they could have. From companies who compete or did compete with Intel and were attempting to provide those devices and failed. Failed to hurdle unnatural barriers thrown in their path by a criminal network.

Frankly, Intel allowed the mafia to take control of its channel structure. To take control of Intel marketing internally, to plant moles and know nothings in competitors. Intel then participated with this channel media mafia through illegal cross incentives. Cross incentive's to systematically eliminate inventors; horizontal competitors, vertical competitor / compliments including adapters, to steal their intellectual property and drive their Industry value to Intel and its combine. Including through PC late market and transition stages where some inventors did attempt evolutionary product implementations. Follow on products offering consumers new forms of value that were deposed by the media which bought time for Intel.

What's worse is that the media component of Intel's juxtaposed dealing combination participated in, if were not the masterminds of the dot.com rip off. The second wave of a three pronged attack (followed by Y2K invented accelerator) on our economy where individual investors were bilked for billions of dollars, by way of some VCs and investment bankers, through channels who talked dot-com newbies into sales preview as a method to commercialize. Academically a known loser from the standpoint of tactical pure spending. Investment capital, and while I don't have direct evidence, appears to have been siphoned from technical development through a period of media consolidation. And when consolidation is often a costly affair.

What's really hideous is that Intel, and others, knew these channels; individuals operating in and outside of their business, were and are criminals. Including those infiltrating their companies. Through Intel non-disclosure, lies to government (perjury in Docket 9288, to GSA and under oath to Senate) support of these forces for their own initiatives, Intel turned their back & chose not to report activities that comprise an economic attack on our nation. Intel executives were well aware of these forces and before the brunt of the damage occurred

With that, Camp Marketing estimates the high tech downturn will extend through 2001. Growth in 2002 will be fueled by PC enterprise advance. New market adoption stage for PC fragment categories will begin sometime in 2002 and ramp through 2003. We will not see the type of technology industry growth associated with the PC market of 1995-98 until at least 2005; ubiquitous computing mid market growth stage.

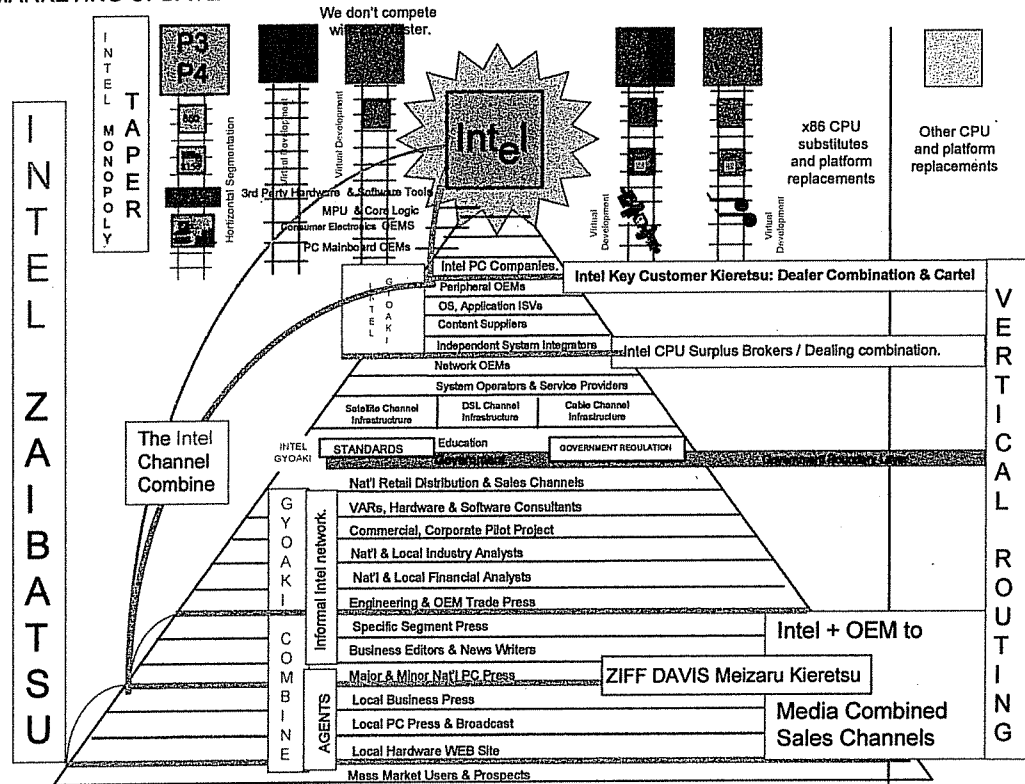
Enhanced map of Intel market barriers in trade terminology:

On the next page is an enhanced map of Intel market barriers in common trade terms.

National Association of Attorney Generals
Pg 6

From left to right, top to bottom, **the Intel Zaibatsu or Power Complex**, the sum of Intel 'vertical' plus 'horizontal' network structure. A multi-tiered industrial syndicate held by Intel value streams; both natural (legal) and unnatural (illegal), controlled by a small group through membership, Intel association, CPU allocation, sufficient to more than sufficient allocation, exclusive contracts, PC and surplus dealership, cross incentive rebate and fee arrangements, stockholding, interlocking or associated directorates, Intel imperial court and personnel appointments, centralized invention, adaptive development, market rigging, combine block marketing, government and consumer manipulation.

CAMP MARKETING UPDATE



Mike Bruzzone, Camp Marketing Consultancy, Campmktng@aol.com, 510/236-8733

February 2001

The Intel Monopoly Industry Taper, Intel and/or Zaibatsu participation in five of five PC component categories; CPU, chip set, graphics, memory, motherboards. Categories in which Intel has protected its first mover advantage to define, implement, manufacturer & sell the whole components of its intraplatform PC design through its dealing network. Individual component markets in which Intel will punish others who attempt to leap frog as a result of their attempts to lead invention, enablement, design, development and manufacture to achieve first mover advantage, primarily for intraplatform, but also affecting inter platform design/development, manufacture and sales of improved commercial and

National Association of Attorney Generals

Pg 7

consumer technology products. Note a graduated RDRAM surplus market is in the making.

The Intel Combine, a physical distribution, communication and sales channel bottleneck between Intel first tier (OEM) physical distribution channels and their media (PC publication and WWW) preview and direct sales vehicles. Juxtaposed dealing combinations are cross incented to push Intel intraplatform offerings onto consumers for a fee. Fees are secured from Intel Inside ad pool rebates held by key Intel customers who are Intel PC dealers and CPU resellers. The size of these ad pools are fixed, skewed to favor Intel dealers who unbundle the Intel Inside rebate from their surplus prior to reselling it from 'closed' industrial into the 'open' broker market. The open market, one rung below Intel surplus brokers, is the only competitive market for Intel CPUs.

Intel Gyokai, areas of informal Intel network membership or association based on mutual business relations, platform dependencies, co-development, stockholding, interlocking or associated Intel imperial court and personnel appointments, membership in the Intel secret police force, their ties to local, state and federal law enforcement, some financial industry analyst and legal fixers, plus their legal prostitutes, and of course the media goon squad.

Intel Key Customer Kieretsu, both a horizontal PC dealing combination, which often acts like a cartel, primarily responsible for resale allocation of the Intel CPU surplus into the broker market. Kierestu relationships take three basic forms; horizontal, production and distribution. Firms are cross connected through common customer base, Intel association, Intel CPU allocation, sufficient to more than sufficient allocation, exclusive contracts PC and surplus dealership, cross incentive rebate and fee arrangements, stockholding, interlocking or associated directorates, personnel appointments, centralized invention, adaptive development, combine block marketing and member participation in Intel Club meetings.

Intel Surplus Dealing Kieretsu, horizontal cartel representing the first tier of Intel surplus resellers maintained by Intel key customers. First tier surplus resellers are closely monitored by Intel to assure that they sell just over the Intel key customer price for current offerings before releasing them into the open broker market on an Intel time schedule.

Ziff Davis Meizaru Kieretsu, one of multiple hidden cartels of related businesses, in this case sister publications, cross connected through centralized ownership, a common customer base with Intel and the Intel Combination, incentive rebate and fee arrangements, stockholding, interlocking directorates and personnel appointments.

National Association of Attorney Generals

Pg 8

Intel production kieretsu consist of Intel key OEMs and some component suppliers. Intel distribution kieretsu consist of Intel key OEMs and their network of physical distribution and communication channels. These horizontal and vertical structures overlap and hold the Intel Business System into an industrial syndicate, corporate political power complex or Zaibatsu.

The Intel Combination is illegal under U.S. law; Sherman Act Section 1. The Intel Zaibatsu is illegal under U.S. law; Sherman Act Section 2, Clayton Act Sections 3 and 7. The Intel Zaibatsu and its subsets of horizontal combinations and cartels is illegal under the European Commission Rome Treaty Articles 85 and 86 (now referred as 81 & 82). The Intel Combination is illegal under JFTC Section 2, 3, 19. Intel Zaibatsu is illegal under JFTC Sections 2, 3, 4, 8.

Specific to SEC disclosure and reporting amendment, as one method to assess corporate sustainability, that companies reporting under SEC guidelines declare, for their market, whether they are a pure play competitor, a competitor/complimentor, a complimentor/adaptor, a public company's design satellite, a manufacturing cluster hedge or an OEM negotiating chip. Companies should be required to report how their network or anticipated constituent connections could result in upside or lose based on political and network hurdles. I will reflect on this through historical examples at future date. I suggest CEO's and board members have failed their charter to ensure company sustainability through a succession of officers who truly support broad stockholder interest.

Specific to Competition Policy Agreement, I trust this edition of the Art & Science of Camp Marketing has provided you, in some small way, information useful in considering U. S. position and path toward negotiation of an International Competition Policy Agreement. Now with the understanding that the Intel Combination has and continues to do onto others that which our government has previously condemned. That we must take this fact seriously into account for an honest and productive dialogue at these trade talks.

For those who are interested, in a **computer model of the Intel system's structure**, one can be developed based on their unit production, price, cost, allocation, contract, fee and rebate arrangements. I have conferred with Ph.D. candidates from a major University to accomplish this task. Against the back drop of national economic indicators an over accelerated Intel CPU introduction clock could be slowed, and a model generated based on production efficiencies complied. Through this model we could assess just how much damage Intel has done to our economy, or not. The cost to begin this project, to obtain Intel product and sales data from third parties is \$10,000. I can't imagine the complete project cost exceeding tens of thousands of dollars with less than a one year completion date. Camp Marketing hereby requests this funding from the National Association of Attorney Generals in exchange for a definitive project plan and timeline.

National Association of Attorney Generals

Pg 9

Specific to antitrust, one final thought I'd like to leave everyone with relates to academic and antitrust influencer comment coming from the Microsoft case. There is no doubt in my mind that unfair competition among producers harms consumers. Even if the harm that consumers experience can't be seen in the price they pay for the predator's product today. And the Intel case is a perfect example. As with any monopoly, including those engaged in forms of price fixing and market rigging, consumer suffrage is seen after the transgression. In this hidden economic war that Intel has engaged us in, all Americans, have paid a price for Intel monopolization.

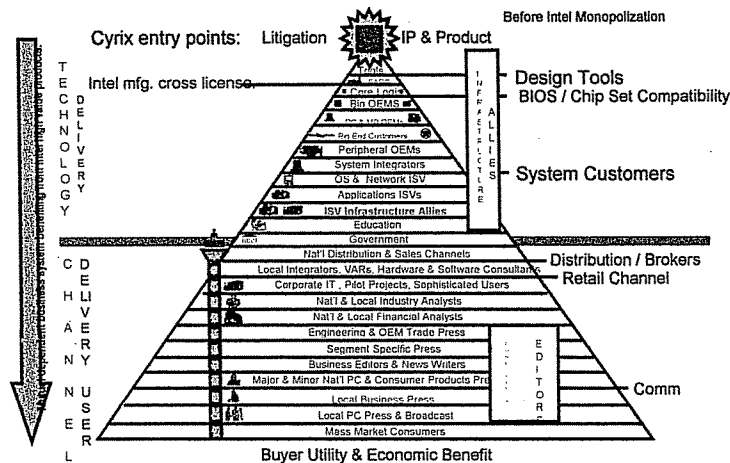
Sincerely,

**Mike Bruzzone
Camp Marketing Consultancy**

The Art & Science of Camp Marketing

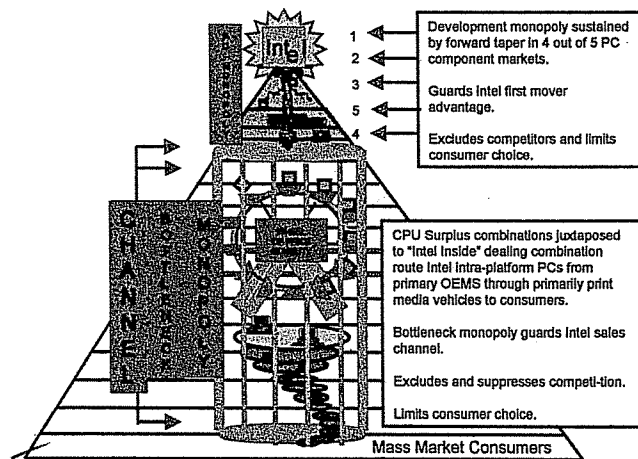
#1 DISCOVERY

x86 PC Industry Structure - 1992 - Natural Entry Barriers



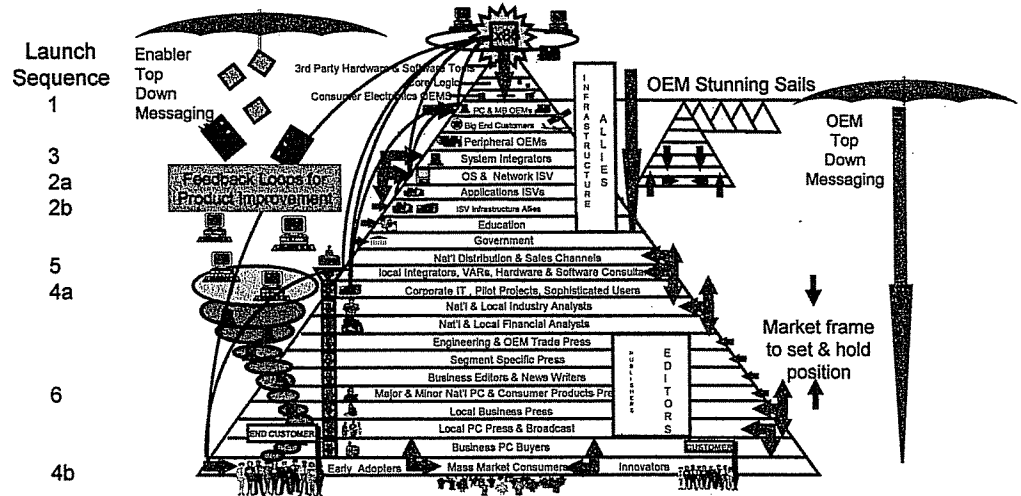
#4 CONNECTION

x86 PC Industry Structure - 1999 - Unnatural Entry Barriers



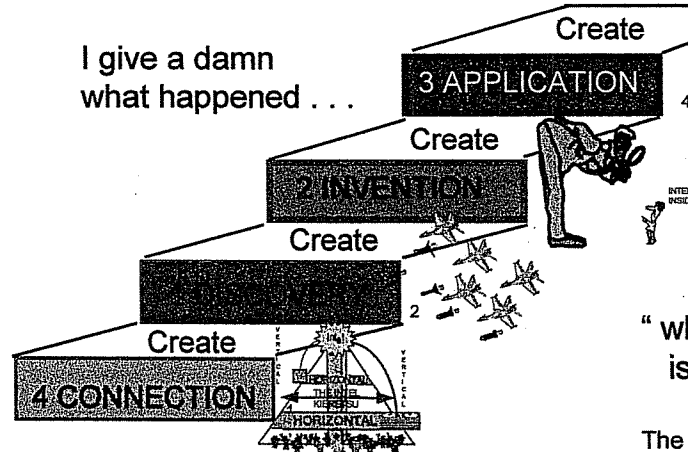
#2 INVENTION & ADAPTATION + #3 APPLICATION

From Camp Marketing - Intel Play Book



Society has to find ways both of recognizing and fostering talent . . . genius breaks the rules and thereby confronts the institutions with challenges which may at first sight appear to constitute a danger to their very existence - Jewkes, Sawers, Stillerman - Sources of Invention, 1958

I give a damn what happened . . .



"what I want to know is why it happened".

The Education of Henry Adams

The Art & Science of Camp Marketing

Antitrust compliance or anti-competitive activity?

1st Half 2000 - Intel Program 2:

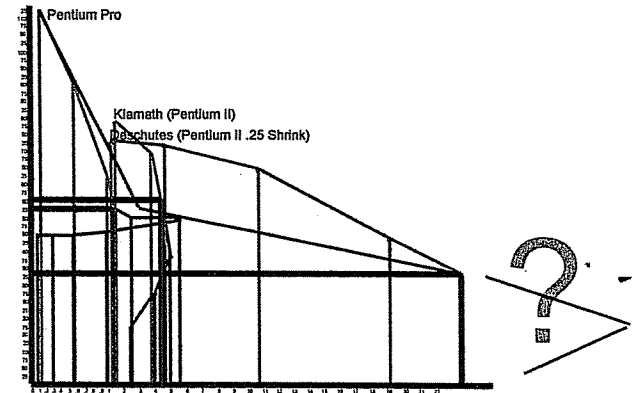
Goal: - Antitrust compliance of monopoly?

Objectives: - Demonstrate Antitrust Compliance.
- Signal movement toward efficient production.

Strategies: - Communications supporting leading product shortage.
- Allow primary customers (ie Dell) time to replace surplus upside with legitimate sales supporting profitability and stock price.
- Parley indicator of Intel CPU surplus market staged ramp down.

Tactics: - New PIII speed grade 'press' demos and review samples.
- P4 architectural introduction and technical demo.
- Produce P4 and CPU supply in relation to actual demand.

Analysis: Completion of Intel P6 core marginal revenue and surplus analysis through Coppermine will tell if Intel is engaged in a staged ramp down of surplus market, or is engaged in a traditional campaign of disinformation hiding true course and intention.



BILL LOCKYER
Attorney General

State of California
DEPARTMENT OF JUSTICE



1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

Public: 916-324-5433
Telephone: 916-324-5433
Facsimile: 916-324-4293

March 21, 2000

Mike Bruzzone
Camp Marketing Consultancy
6000 Park Avenue
Richmond, CA 94805

Dear Mr. Bruzzone:

Thank you for your e-mail suggesting a meeting concerning alleged violations of the antitrust laws by Intel.

Given the technical and legal complexity of your charges, I think it still makes sense for you to continue to work with Tom Greene and our Antitrust Law Section. As you are aware, there are still questions about whether your charges against the "Intel Inside" program are, in fact, antitrust violations. Until that is clearer, I think that you should continue to work with our antitrust staff.

Sincerely,

RICHARD M. FRANK
Chief Assistant Attorney General

For **BILL LOCKYER**
Attorney General

To: Attorney General Janet Reno, Department of Justice
Chairman Joel Klein, Department of Justice
President Clinton, United States of America

cc: Judicial Committee
U.S. Senate
State Attorney Generals; NAAG Antitrust / Consumer Protection Committees
Deputy Undersecretary of Technology Bachula, Dept. of Commerce
Undersecretary of Technology Shaver, Dept. of Commerce
Judge Timony, Federal Trade Commission
Judge Nelson, U.S. Federal Court Alabama
Chairman Pitofsky, Federal Trade Commission
Director Parker, F.T.C. Bureau of Competition
Director Tenet, Central Intelligence Agency
Vice President Gore, United States of America

Fm: Mike Bruzzone
Camp Marketing Consultancy
6000 Park Avenue
Richmond, CA 94805
510/236-8733, campmkting@aol.com

Re: - U.S. Vs. Intel; F.T.C Docket 9288
- D.O.J. intervention in and handling of this case.
- Congressional investigation of F.T.C. case for co-conspirators in restraint of trade.

Ms. Reno, Mr. Klein & Mr. President:

In light of my prior correspondence covering Intel Business System anti-competitive acts and standing violations of the law, I am writing to ask for Department of Justice intervention in the Federal Trade Commission case of U.S. vs. Intel; FTC Docket 9288. This action would include the Department of Justice assuming this case from the Federal Trade Commission. Conducting a thorough and honest investigation, including judicial proceeding to isolate, verify and provide remedies correcting standing violations of the Congressional Antitrust Act. These include a minimum of two *per se* violations of the Sherman Act Section 1, a minimum of two *per se* violations of the Sherman Act Section 2, and one *per se* violation of the Clayton Act Section 3 by Intel Corporation the Ziff Davis and multiple does who are members of the Intel Combination.

Additionally, at this juncture in 2007, the system and process failure that has exhibited itself as a repeating pattern; domino oversight failures cascading across the F.T.C., D.O.J., F.B.I, C.D.OJ and other Federal and State institutions and regulatory bodies, must be defined and understood with preventing mechanisms put back into place. Not just a polishing of the regulatory clockworks, but a full mechanical repair assuring adjoining gears in the system run smoothly in-spec and as designed to function.

In frank, to clean up this mess of a cascade failure in oversight and fail safes to prevent another one from occurring just like it; forever and always.

The Intel Combination, a hidden domestic kieretsu undermining to our nation's physical, economic, moral and legal well being. A closed business and economic network harnessed by Intel through multiple means including an illegal commission system which through multiple similar value ties attaches Intel intra-industry PC platform physical distribution channels to their media dealer preview sales vehicles. A destructive force now spreading across the Internet as new Kieretsu form despite this foremost example of their power too penetrate and undermine the technology segment of our industrial manufacturing sector.

One way of assessing the winners and losers from this network's influence to manipulate consumers and government alike, through one complete 'charter' PC adoption cycle, is provided in the attached spreadsheet. Other examples are available. This addendum notes Intel monopoly position as a percent of component design wins including documentation of CPU to chip set to motherboard downstream product ties; intent to monopolize and a Section 2 violation.

The Intel Combination born on May 16, 1991 was initially an alliance between physical distribution channels; direct PC systems integrators including Dell, Zeos, Northgate, Gateway and their 'sales preview' dealers; the Ziff Davis and other Publishing Companies. Given the demonstrated power of this kieretsu, including additional physical distribution and other industry layers co-opted by them; investment banking and financial analysts, even the distinguished Doctor has suggested a travesty of this proportion beyond his appointed leadership power to correct. I suspect the influence of organized crime and/or geo political forces in this matter overwhelming for even the most democratic minded industry leaders. For fear of physical and economic retaliation for which the Intel Kieretsu is known, including against law respecting members of the aforementioned companies trapped by this criminal network.

Which leaves only government in its role as guardian of our constitution and democratic rights to lead in correcting measures. The Clinton administration is aware of these legal violations; of organized crime infiltrating corporations in our democratic society, including government inaction to enforce our laws preventing this destructive force. Has the administration moved to call for a thorough investigation?

In this Wintel compliment to the Microsoft case, I ask why has our government ignored standing violations of the law on the Intel side of the coin? Why is Microsoft held responsible for its actions as a corporate bully when the Intel bandit and organized physical distribution and media criminals are allowed to proceed uninhibited and apparently above the law? Especially in relation to evident standing violations, which I suggest can be assessed through something as simple as a summary judgment of law. Because finding Intel, Ziff Davis and other media responsible for Section 1 violations for what must be the largest (fee for rebate) fixing scheme in the history of U.S. business; extending over seven consecutive years, *requires little more than a summary judgment of law*. That is from judicial comparison of the Intel Inside published agreement and assessment of its working structure in relation to the Congressional Antitrust Act. In my opinion one of the most intriguing of the new competitive structures cases given a system by industrialists and their advisors to game the value workings, and timing of their cluster, and an for whole lot more.

So, a new form of world war without ballistic weapons and just as destructive. A model which over successive market transitions, being artificially accelerating in the technology segment, is capable of concentrating power into the hands of just a few corporations and their primary media channels; through product routing based on consumer manipulation and in a very short period of time. This analyst estimates less than 20 years. Subsequently should vertical restraints be reapplied to counter this catalyst for systematic consolidation of our nation's wealth generation potential by horizontal combinations that include the media?

As an analyst I am not against the deployment of vertical value attachments so long as inter-brand competition is allowed to exist and grow. However when the extent of those attachments are strategically designed horizontally to commission media between \$5 and \$25 for each Intel intra-brand PC platform sold, suppressing horizontal competitors, manufacturing and other emerging clusters there's a problem. A problem; routing, which has transplanted itself from hard copy media, is now growing within the Internet, and has taken on an entirely new form in accelerated venture greenhouse's in violation of SEC Act 40. So, government faces industry violating both antitrust and SEC laws from the same root cause. Root cause including government shuffling this problem under the rug and failing to act?

Horizontal dealer combinations in the service of a primary vertical enabler are illegal. And when one considers this dealer kieritsu was specifically formed among members of physical distribution plus the media our country faces a grave issue spreading to other channels and specifically the web. The web is not the great emancipator for freedom of expression as some technologists might claim. Because vested channel interests are already using the Internet as a very targeted method to route. And there are specific instances in our foremost Intel example; that of CNET which has been up to 10% Intel owned, now having evolved over a complete PC product growth cycle over the last several years. Intel represents one complete example of a kieritsu manipulation to grow and concentrate a network through a complete PC cycle; adoption through growth and maturity.

In short, we are giving up our democratic rights in favor of consumer manipulation by corporate entities in control of channel entry and exit points. Corporate state in the offing and the foundation for new fascism. This is happening right now. And will government step in to stop it?

Our country outlawed kieritsu's in a document signed between General MacArthur and the Japanese Imperial Command. A surrender agreement which stipulates our countries involvement in the development of that countries post WWII democratic constitution. A democratic constitution that makes all forms of kieritsu combinations illegal. So why is our government allowing kieritsu to form in this country now? And is our democratic constitution any different then the one we insisted on the development of just 55 years ago.

Further, after being informally invited to input to the FTC in March of 1998, I have stood by while my investigating attorney contacts at the F.T.C. where buried and/or dismissed. Including my observing the resignation of former F.T.C Director William Baer, who after negotiating a sole and lacking consent agreement which side stepped the major issues in U.S. vs. Intel, was written off by me as victim of coordinated manipulation by the Intel Kieritsu. Combined business interest who position to capture 100% of their economic

output of the Intel rebate while using their monopoly position to dismantle competitors who would challenge this illicit cash gold mine. **On the eve of his departure from the FTC Mr. Baer was quoted in the Wall Street Journal saying there's something wrong with the Intel Inside tactical market program.** Today we know what's wrong. A hidden rebate fee scheme totaling \$2.2 to \$3 billion; depending on how one estimates the media commission stipulated by the Intel Inside agreement, *doubling to between \$4 and \$6 billion by year end 2000.*

Treble damages then from this most visible and quantitative indicator of Section 1 and 2 violations places economic loss at up to \$18 billion. A lot of money that could fund alternate and/or complimentary inter-brand computing choices in relation to the Intel intra-brand platform monopoly over the last nine years.

The F.T.C. has failed to bring multiple known violations of law to light and take corrective action under Section 5 which is transgressed by standing violations of law that are known. Given these indicators Congress has a legal and moral obligation to investigate the matter.

Following is my correspondence to the F.T.C. and State Attorney Generals of November 18th (see pages 6 – 8 in hand by the Commerce & Oversight Committees; Exhibit 4) cultivating an understanding of Intel Combination Sherman Act Section 1 and 2 violations: contract, combination in restraint of trade; power and intent to monopolize. Today, the program continues to bilk consumers through a hidden (fixed) fee (commission) now equivalent to 3% of an Intel PC Platform's Intel CPU price to the original equipment manufacturer or system's integrator for pass through to media.

A consumer fee fixed as a tax that can raise Intel platform pricing by 3%. An illegal influencer by the Intel Combination inorganically designed to structure consumer purchase patterns across all segments; government, corporate, industrial, scientific, other commercial, education and home users. In a codependent program where 100% of the commission fund is returned entirely to media in exchange for their structurally accelerating certain Intel intra-brand consumer PC choices while limiting others.

Key cases substantiate Intel Corporation as a monopolist per se, including per se violation of the Sherman Act Sections 1, 2 and Clayton Act Section 3. Subsequently the Federal Trade Commission has more than enough cause to proceed with their Section 5 action. Moving immediately to judicial review, findings of fact (if not summary judgment), determination of conduct and structural remedies specific to per se antitrust violations in U.S. v Intel, F.T.C. docket 9288. A proceeding which ultimately must be designed to curb the Intel monopoly, dismantle the Intel/Ziff Davis + other combination members, stop a retail price maintenance scheme by these conspirators, return between 2.2 and 3 billion dollars in transport fees to consumers who were robbed by Intel, Ziff Davis and multiple does.

Every day the F.T.C and Department of Justice wait to press forward on this case consumers are being bilked of their hard earned dollars covertly and illegally. With the total sum of Intel Inside recoverable commission fees paid by consumers to media doubling from \$2.2 to \$3 billion to between \$4 and \$6 billion by year end 2000. That's a lot of money considering that the Intel Inside program itself has been bilking consumers since its inception in 1993.

Communiqué; January 27, 2000; pg 9 of 10

And now in one year its total sum can double.

U.S. corporate interests who are victims of the Intel monopoly and combination are suppressed, undermined, financially destroyed with numerous failures and bankruptcies as a direct consequence of Intel Combination acts over the last six years. In the hundreds of thousands of U.S. Citizens have lost their jobs as a direct result of monopoly attack on their employers by Intel Corporation and co-conspirators including the Ziff Davis Publishing Company. Further, Intel Corporation and the Ziff Davis Publishing Company have directly attacked competitor's employee(s) to suppress their competitive reference specific to winning methods of beating these forces in the market, including direct knowledge of restraint of trade and other criminal acts by the Intel Business System, Kieretsu and their ninja's other operatives, agents and moles.

Initially the Federal Trade Commission, but now the Department of Justice and Congress are chartered by law to act in this matter. And we can't just turn our back on crime, standing and per se violations of the law. So much about our future rests on the precedent these hideous acts by corporate + media combinations create. Because the Intel Combination is not the only example. However it is the leading and most complete example given its nine year history. And will others be allowed to get away with this; an economic attack on our country by dismantling its enablers and manufacturer/marketers? Will our democratic institution act?

As a citizen and victim targeted by the Intel Kieretsu, I've spent a lot of time documenting these legal violations, never believing that the government would also sell out.

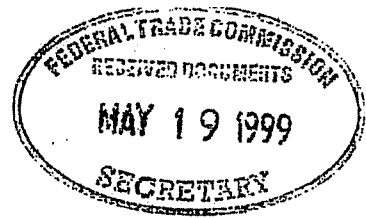
I would really appreciate a personal written response from your offices outlining what can be done, and how I can continue to assist in this most serious matter to get American Democracy, its regulatory and oversight systems working again.

Sincerely,

Mike Bruzzone

Ask for attachments to this correspondence from Judicial Committee, Dept. of Commerce, F.T.C., D.O.J., Office of the President: Intel Business System expansion/contraction spreadsheet. 34 page white paper on implications of corporate + media combinations.

May 19, 1999:



To: Mike Bruzzone
Managing Director
Camp Marketing Consultancy
373 River Oaks Circle, #825
San Jose, CA 95134

Fm: Office of the Secretary
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: **FTC Confirmation of Receipt; Camp Marketing daft 5.4 response
to Intel/FTC Consent Agreement (Docket 9288)**

FTC Office of the Secretary received the contents of your package on:

May 19, 1999, 1999

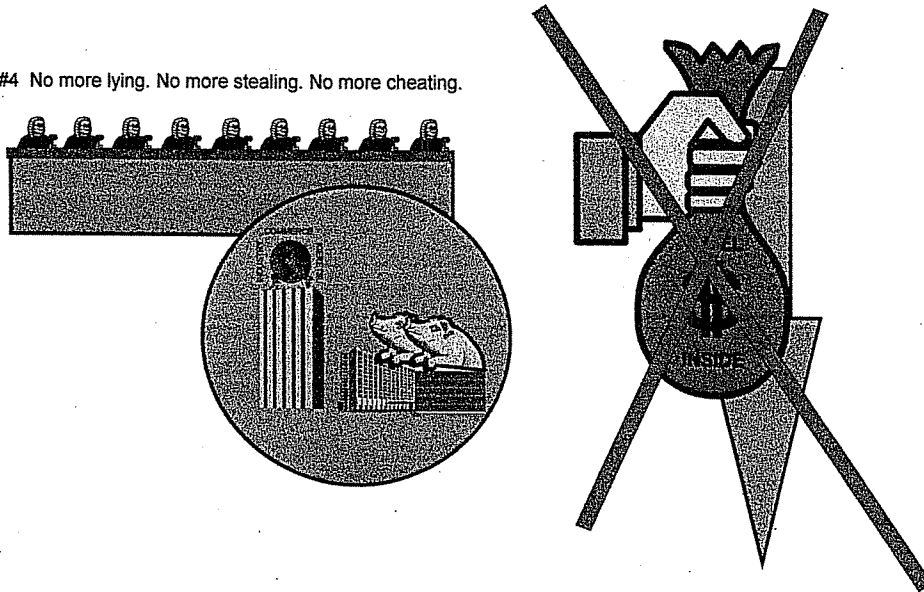
Office of Secretary Representative

Camp Marketing for Intel Corporation

Through its own example of leadership Intel Corporation provided an example for its network to do the same.

Remedy to Intel Business System anti-competitive practices:

#4 No more lying. No more stealing. No more cheating.

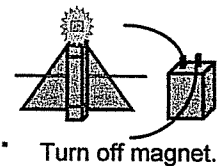


1) Open tech development bottlenecks:

- Place limits on tying to scale.
- Open CPU market horizontally.

2) Curb network effect:

- Ban exclusive dealing.
- Assure vertical competition.



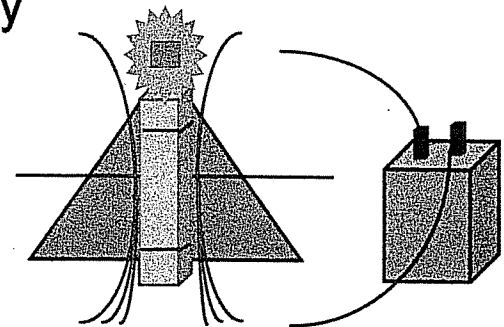
3) Ban Intel Cartel manipulation and interference with natural market selection.

The Art & Science of Camp Marketing

“Any combination which tampers with price structures is engaged in an unlawful activity”

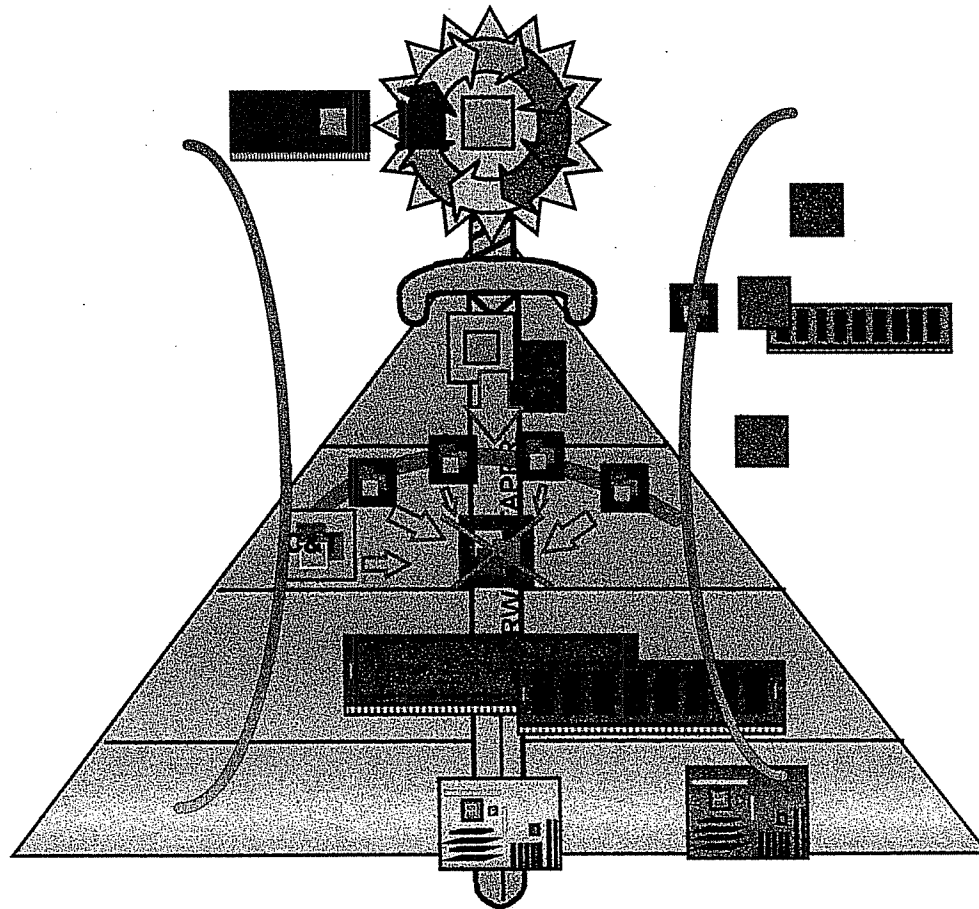
- Thomas Morgan, Oppenheim Professor of Antitrust and Trade Regulation Law
National Law Center, George Washington University

“Monopolization means changing industry structure to reduce competition”. - Timothy
Bresnahan, Professor of Economics, Stanford University



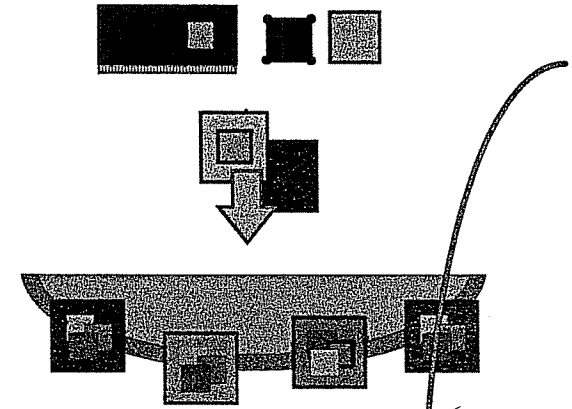
The Art & Science of Camp Marketing

Intel Structural Manipulation

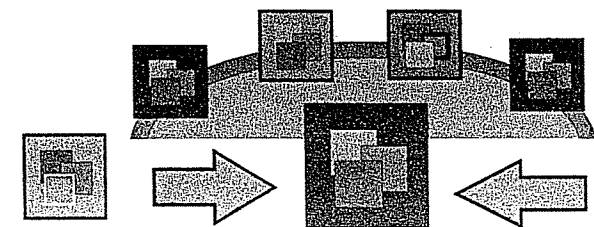


Independent Graphics Layer is Concentrated / Eliminated

Intel Defense



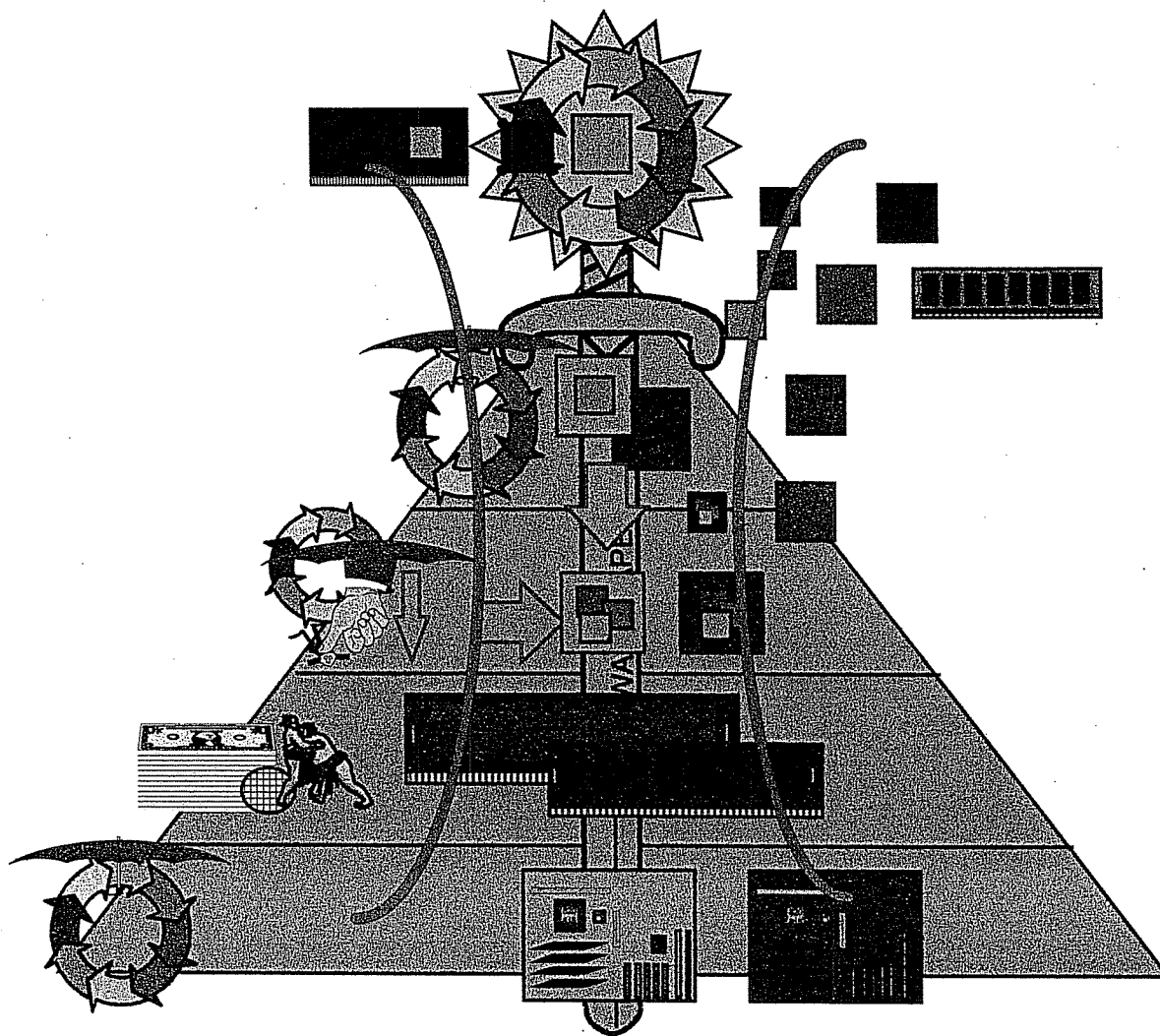
Intel Offense



Intel Consolidation

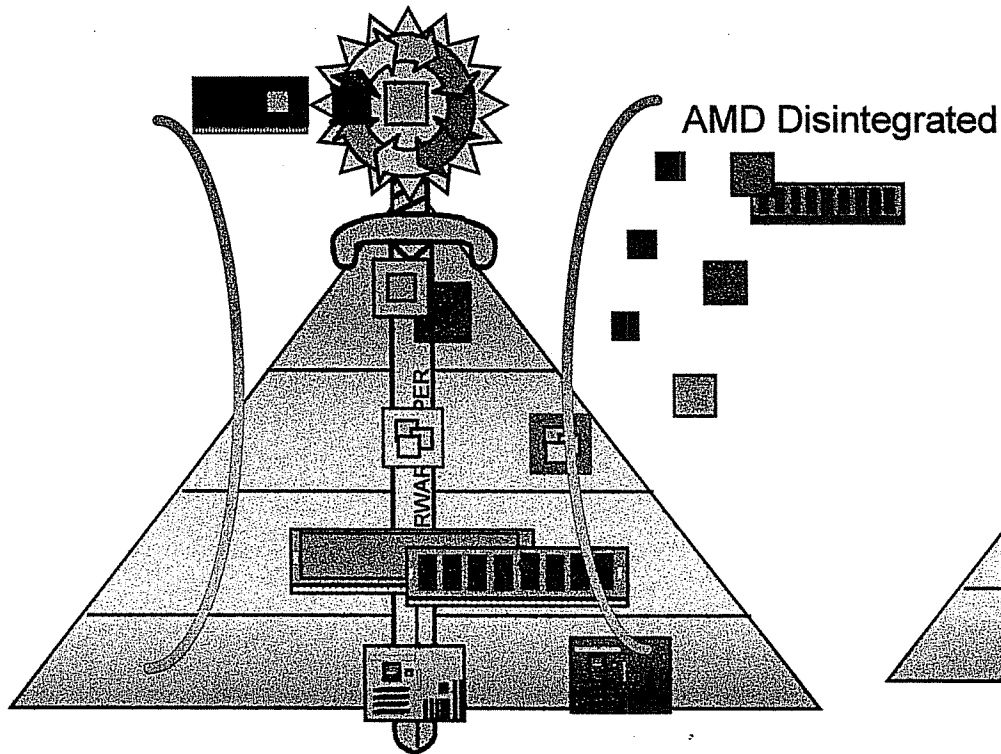
The Art & Science of Camp Marketing

The Intel PC Monopoly & Component Jugular

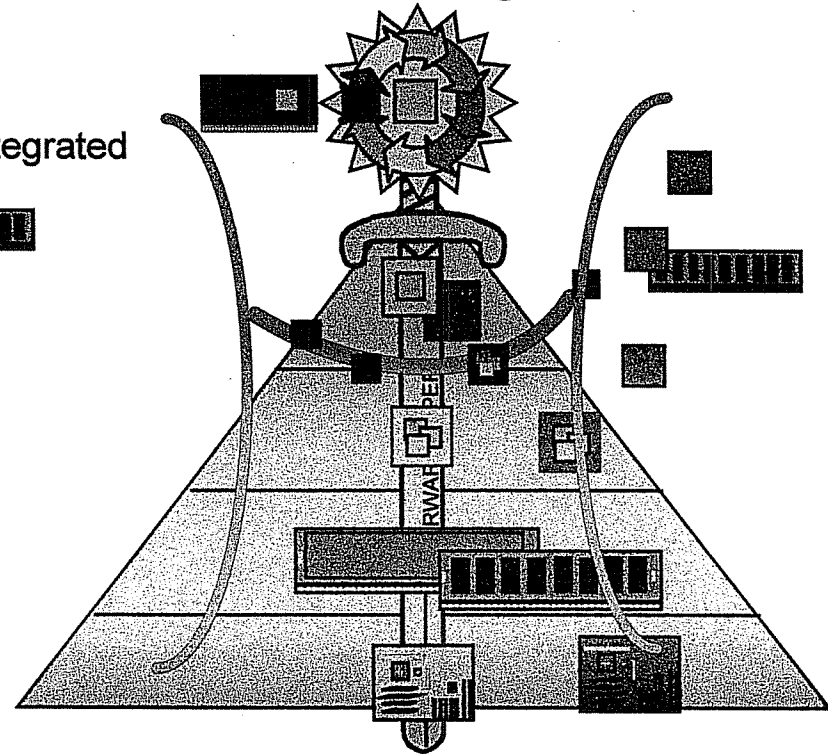


The Art & Science of Camp Marketing

Intel Intergrated



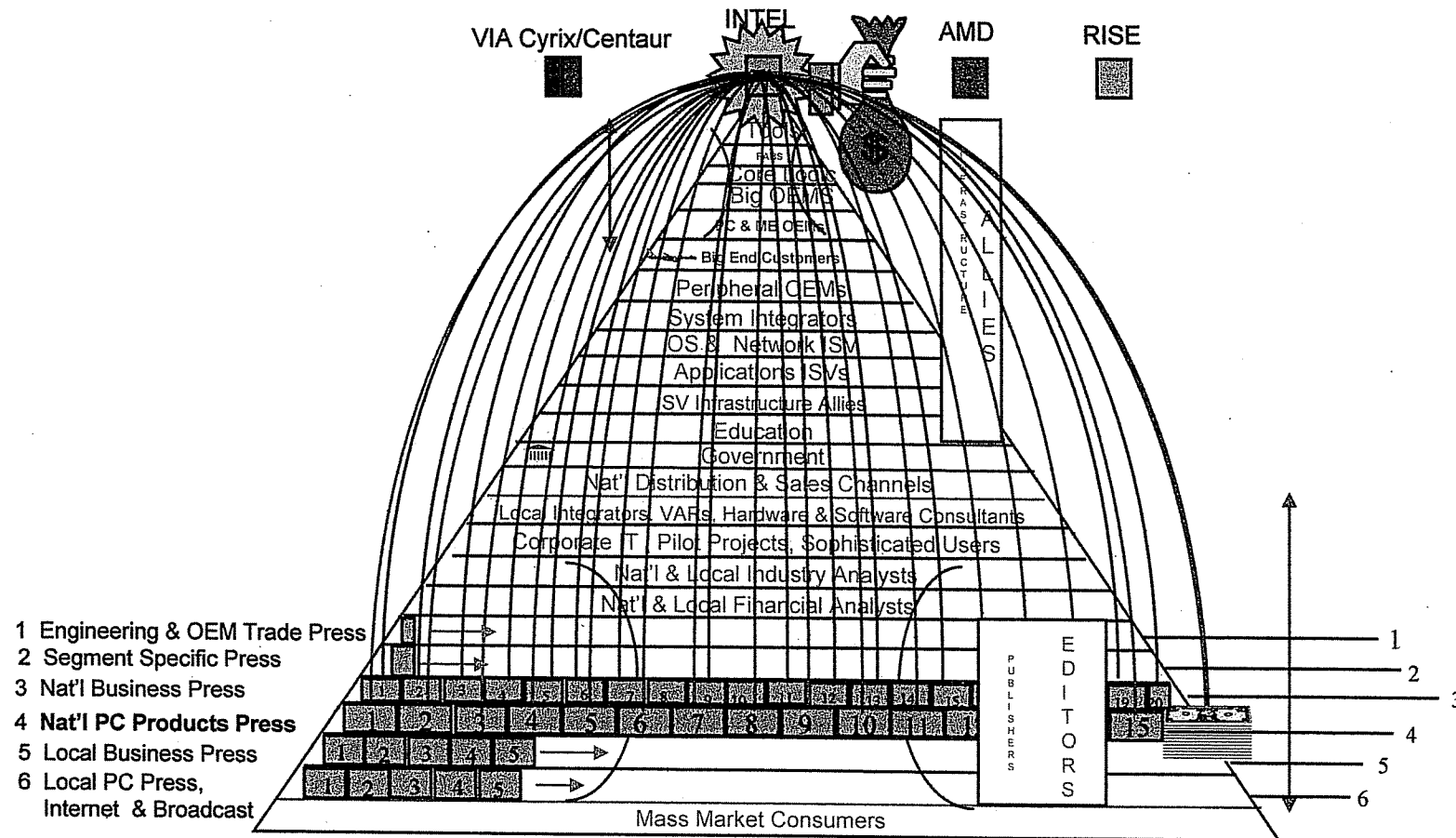
Intel Disintegrated



Market expansion is a function of Horizontal + Vertical Disintegration.
But only in the presence of equitable enabler stewardship.

Camp Marketing for Tom Greene

Tom: Eight separate types of communication vehicle's are shown occupying six vertically adjoining layers of the PC market hierarchy . . . with the mass market at the base of the PC "market" structure . . . with market structure indicated below the government boundary layer . . . and PC "development" (industry) infrastructure above. Each numbered block represents a publication (constituent). An exact number of constituent building blocks exists at each rung of the development and market structure . . . not all constituent building blocks are depicted here . . . nor are they identified.



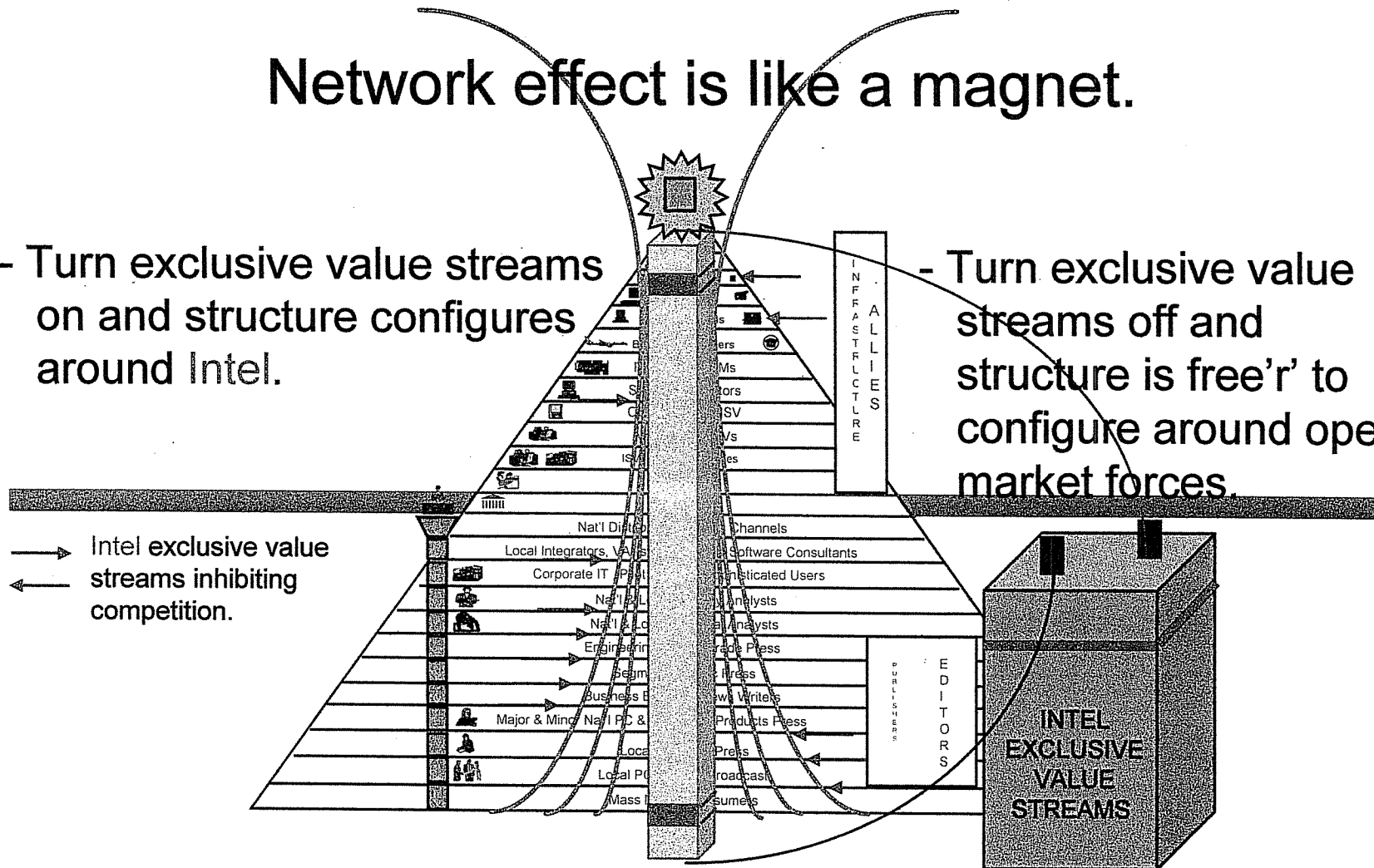
Question? As Intel deploys its exclusive Intel Inside vertical restraint . . . indicated by the green lines across the 1st through 15th player of the Nat'l PC Products Press layer . . . does a horizontal block (combination) occur? And does the extent and depth of each of these horizontal barriers build . . . blocking Intel competitors from market access?

Camp Marketing for Intel Corporation

Network effect is like a magnet.

- Turn exclusive value streams on and structure configures around Intel.

- Turn exclusive value streams off and structure is free'r to configure around open market forces.



“Vertical activities should not be generally impeded unless they unduly exclude other competitors from access to customers, channels, or suppliers.” - M. Porter

DANIEL E. LUNGREN
Attorney General

State of California
DEPARTMENT OF JUSTICE



300 SOUTH SPRING STREET, SUITE 5212
LOS ANGELES, CA 90013
(213) 897-2000

FACSIMILE: (213) 897-2801
(213) 897-2691

December 1, 1998

Mike Bruzzone
Camp Marketing Consultancy
373 River Oaks Circle, No. 825
San Jose, CA 95134

RE: Recent Actions of Intel Corporation

Dear Mr. Bruzzone:

We have received your correspondence, dated September 21st, August 20th, and earlier this year, regarding the recent actions of Intel Corporation and the Intel Business System.

At present, the Federal Trade Commission is holding administrative hearings, *Intel Corp.*, FTC Docket No. 9288 (June 8, 1988), to investigate possible national antitrust concerns raised by Intel's behavior. Due to these ongoing proceedings, the FTC is the governmental agency in the best position to evaluate the effect upon the current market of any of Intel's most recent actions. I have forwarded copies of your correspondence to the appropriate person within their office in Washington, D.C. Should you have any additional concerns in the interim or should you discover any new information regarding these issues in the future, you may address your correspondence directly to: John Horsley, Deputy Assistant for Mergers, Federal Trade Commission, 601 Pennsylvania Ave., Rm. 3627, Washington, D.C. 20580.

We appreciate the information you have brought to our attention. Thank you for advising us of your concerns.

Sincerely,

DANIEL E. LUNGREN
Attorney General

BARBARA M. MOTZ
Acting Assistant Attorney General



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

SEP 22 1998

Mr. Mike Bruzzone
Camp Marketing Consultancy
460 Ralston
Mill Valley, CA 94941

Dear Mr. Bruzzone:

This is to acknowledge that Chairman Pitofsky's office received a copy of your August 26, 1998, communication to Messrs. Lin and Cook of the FTC regarding Intel Corporation. Thank you for providing the information.

Sincerely,

Ernest A. Nagata
Office of Policy and Evaluation
Bureau of Competition

September 7, 1998

To: F. Thomas Dunlop Jr.
VP General Counsel & Secretary
INTEL CORPORATION
2200 Mission College Blvd.
P.O. Box 58119, MS RN2-01
Santa Clara, CA 95052-8119

RECEIVED

SEP 09 1998

Cc: Office of the Chairman
Intel Corporation

CRAIG R. BARRETT

Via: U.S. Certified Mail

From: Mike Bruzzone
Managing Director
Camp Marketing Consultancy
373 River Oaks Circle, #825
San Jose, CA 95135

Sir:

In order to guard the interest of officers of Intel Corporation who may or may not be subject to immunity and amnesty under United States anti-trust law, this correspondence is to remind those Officers, Directors, Executive Managers, Security Personnel, Camp Relations and other agents, including the Intel Secret Police, members of law enforcement such as the Sheriff's department or otherwise, that the U.S. Government has been notified of my request for protection from harm given potential for retaliation by Intel and its relations that could be crippling to life threatening.

Subsequently, if anything happens to me before or during the Intel FTC hearings, such as disappearance, crippled, heart attack, stroke, being found dead in a ditch, I pray the U.S. government including Justices assigned to related cases would look poorly upon such a travesty including harsh consideration in determining appropriate penalties. I would appreciate your compliance in directing Intel Business System members that any acts compromising my health or placing me in any danger would be looked upon poorly by Intel Corporation and its officers.

I trust break-ins of my home and wire taps such as those throughout 1997 will not be repeated. Given current environment, and specific to our August 8, 1997 meeting in which your representative, Doctor Stock, queried me specific to the potential of being poisoned during my tenure with Cyrix Corporation, and where I concurred that something was amiss, believe this action necessary. I trust you maintain the recorded proceeding should verification of this portion of the discussion be required. Your cooperation would be appreciated.

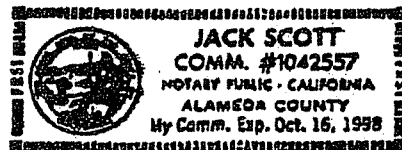
Should you desire, you are welcome to contact me specific to arbitration satisfying prerequisite for restitution to injured parties as a method to satisfy this single requirement in seeking amnesty and immunity from maximum anti-trust penalties potentially affecting Intel Corporation and its officers.

Sincerely,

Mike Bruzzone
Managing Director
Camp Marketing Consultancy

Subscribed and Sworn Before me
on this 12 Day of September

[Signature]



cc: FTC
U.S. District Court

12050DOC00076
Intel Confidential
Subject to Protective Order

August 28, 1998

RECEIVED
SEP 1 1998
G. E. MOORE

To: F. Thomas Dunlop Jr.
VP General Counsel & Secretary
INTEL CORPORATION
2200 Mission College Blvd.
P.O. Box 58119, MS RN2-01
Santa Clara, CA 95052-8119

Cc: Office of the Chairman
Intel Corporation

Via: U.S. Certified Mail

Fm: Mike Bruzzone
Managing Director
Camp Marketing Consultancy
373 River Oaks Circle, #825
San Jose, CA 95135
408/526-0901

Re: Second request to cease & desist

Sir:

As a reminder specific to prior correspondence of May 10, 1997, and in recognition of multiple incidents occurring over the last 12 months, this correspondence is to remind the Directors, Officers, Executive Managers, Security Personnel, Camp Relations and other agents of the Intel Corporation, that efforts to block or otherwise black list Camp Marketing Consultancy services including employment by direct or indirect Intel competitors, satellites or complimentors, is a violation of Section 5 of the Anti-trust act. ✓

Your cooperation would be appreciated and all incidents will be reported.

Unequivocally,

Mike Bruzzone
Managing Director
Camp Marketing Consultancy

cc: FTC
U.S. District Court

12050DOC00078
Intel Confidential
Subject to Protective Order



STATE OF NEW YORK
DEPARTMENT OF LAW
120 BROADWAY
NEW YORK, N.Y. 10271
(212) 416-8868

DENNIS C. VACCO
Attorney General

HIRLEY F. SARNA
Assistant Attorney General In Charge
Consumer Frauds and Protection Bureau

August 17, 1998

Elmo Matthews

4025

Re: Our File No: 98-09353
Company: Intel

Dear Sir or Madam:

On behalf of Attorney General Dennis Vacco, I writing to notify you that we have received your correspondence.

We appreciate your alerting us to this matter. We believe the organization shown below may be able to assist you and we are forwarding your correspondence there.

If you do not receive a response in the near future, please follow up directly with that organization. I suggest you attach a copy of this letter or, if appropriate, mention that you are adding new information.

Thank you for contacting us.

Very truly yours,

Barbara Anderson
BUREAU OF CONSUMER
FRAUDS AND PROTECTION

CC:
Federal Trade Commission
Consumer Response Center
600 Pennsylvania Ave., NW
Washington, DC 20580

4

SC 41-202

PURCHASE AGREEMENT - SERVICES

Agreement #: 1997-0808-CMM/100-3051-8/MB

Effective Date: 8 August 1997

Expiration Date: 22 August 1997

Payment Terms: Net 30 Days from receipt of invoice

BUYER: Intel Corporation (and all Intel Divisions and Subsidiaries, hereinafter "Buyer" or "Intel").
Legal Department

SUPPLIER: Mike Bruzzone (hereinafter "Supplier").
Individually and dba Camp Marketing Consultancy

Please make check payable to "Mike Bruzzone"
Thks

Idenda attached hereto and
corporated herein by reference.
mark "X" where applicable.)

<input checked="" type="checkbox"/>	"A"	Scope of Services, Prices/Rates
<input checked="" type="checkbox"/>	"B"	Performance Standards
<input type="checkbox"/>	"C"	Negotiated Changes
<input type="checkbox"/>	"D"	Preprinted Forms
<input type="checkbox"/>	"E"	

Not Applicable

er may purchase and Supplier shall provide the Services as described on Addendum "A" at the prices provided therein in accordance with the
ormance standards of Addendum "B" and the terms and conditions of this Agreement. All purchase orders issued to Supplier by Buyer during the
1 of this Agreement shall be governed only by the terms and conditions of this Agreement notwithstanding any preprinted terms and conditions on
plier's acknowledgement or Buyer's purchase order.

TEL CORPORATION (BUYER)

SUPPLIER

Signature
Christopher Moropoulos
Printed Name
for Attorney

August 1997

Signature
Mike Bruzzone
Printed Name
Principal
Title
8 August 1997
Date

Refused to take the validity of many
3/24/98

intel.

0040 9/17

7

- AMD

- 9/16 calld AMD

"Intel control has been bypassed."



- Wanted to deliver reports to
AMD

- You know she ever before.
3 yrs.



INTEL CONFIDENTIAL
SUBJECT TO
PROTECTIVE ORDER

(08/29/95)

TO Mike Bruzzone

To: San Francisco From: San Francisco

Re: 196-0, October 22, 1996

FEDERAL BUREAU OF INVESTIGATION

Details: On 8/6/96 Mike Bruzzone met with writer at the San Jose resident agency of the FBI. Bruzzone reported that AMD and Cyrix corporations have been extorted by Intel and Ziff-Davis Publishing company. Bruzzone indicated that he worked for AMD as a Vice President of Marketing and as the Director of Public Relations for Cyrix and that he has been fired from both jobs due to articles published by Ziff-Davis. Bruzzone said he discovered and reported employees inside Cyrix and AMD providing information to Ziff-Davis. Bruzzone indicated that both Cyrix and AMD are direct competitors of Intel, and that Intel was corroborating with Ziff-Davis in an effort to damage Cyrix's and AMD's reputation and lower their stock values.

Bruzzone stated that when Ziff-Davis found out he knew about their collaboration with Intel, Ziff-Davis began a campaign of negative press against his employers forcing them to fire him. Bruzzone indicated that he is currently unable to obtain employment in the computer industry because of Ziff-Davis' influence. As proof of these accusations Bruzzone provided writer with an article published by Ziff-Davis which he claims is an elaborate, but obscure warning to the computer industry not to employ him.

Bruzzone had further documentation which he claimed supported his accusation, but he would not provide copies to the FBI. Bruzzone said he is pursuing a civil lawsuit and that he would provide the documents to the FBI at a later date.

◆◆

May 20, 1996

Rob Herb
Vice President Strategic Marketing
AMD

Personal and Confidential

Rob:

We met back in January and I believe you might have been helpful in authorizing my first trip to Austin. When we first met at NexGen, I was in essence, marketing manager for Nx586 under Dana Krelle. Since, my position has evolved fully toward camp marketing now supporting 5k86. You were instrumental in approving the budget. Our initial user group effort at NexGen and the migration of this program to AMD has not been wasted. Thank you for your support.

The other day a bird whispered in my ear as to the benefit of networking within AMD. As one prone to do so anyway the wisdom in this observation was keen. As the benefactor of our user group budget, I really appreciate that you're first on the list. Thank you. I'm interested in an hour of quality time to be appraised on your vision. *I'd like to understand management's view on AMD path and strategic marketing plans so that I can adjust our user group effort to better parlay off macro planning.* Look forward to meeting today at 3 pm.

Situation:

AMD's PCUG effort is posed for ramp. A strategic marketing initiative to develop foundation "market" support such that AMD's reputation and credibility will never suffer through a lull ever again. If this we're true today, 5x86 would be known for the success that it actually is in the general market. In comparison the part is pooh-poohed by observers for its product nomenclature while positives like P75 performance for \$100 less (at the board level) compared to Pentium are overlooked. Users who influence others don't care about the product nomenclature when price/performance and value benefits. For many its the perfect solution. Observers suffer from this conceptual barrier at AMDs expense. Although margins are tight, AMD is going in the right direction here from a percentage of the markets perspective . . . primarily the price conscious.

Better yet, and again a point observers sometimes miss, 486 is competitive against \$30 to \$50 RISC in PC appliances given the extent of existing tools, logic, then the software that follows. Efforts such as our user group program among tool, logic, OEM, OS and

12052DOC00549
Intel Confidential
Subject to Protective Order

application ISVs as well as infrastructure camps could adjust this anomaly. The ARM plan provided to you was a similar program under my direction.

5k86 is still little known in the end user market. During my travels, I have never heard it referred to as 5k86, and I am a champion of the naming. Austin informed me there might be a change. I'm in a holding pattern. At a recent swap meet, in each unaided instance when someone came up to me they asked about K5. Five people in 500. But they are the only one's that asked. I asked another ten people if they knew what K5 and 5k86 were. Two knew K5 and none knew 5k86. Reseller awareness was mixed and my research was corrupted. Resellers point to 5x86 in their parts display case as back-up. My personal opinion is that the opportunity cost of fumbling back to K5 is too high at this stage. In the markets eye and from the standpoint of Austin colleagues remaining stuck in a product introduction trap. Top down advertising can set nomenclature in a span of nine to twelve weeks. Right now the mass market looks at 5k86 as AMD's Pentium 586.

Back to bottom up efforts. User group efforts motivate a horizontal cross section of the market. They are all impactful in that word of mouth scatters broadly at a rapid pace. Even now, this one single camp among our total constituency is initiating competitive moves on AMD's behalf. Just like at the top of our architectural hierarchy, the base is now active. Efforts such as this have wide ranging implications specific to AMD getting its way in the market.

AMD loyal are everywhere. Coordination is all that is required to get the mass moving in support of AMD initiatives, to fortify position and migrate our 40 million Windows compatible x86 installed base through K5 to K6. We need to keep our camp of AMD users involved and interested through K5 transition to K6. And, for AMD to migrate the installed base to K6, several K5 tactical hurdles await dead in our path: lagging product, socket 7 transition, Pentium Pro price drops. Its not a clean migration path and in this is the challenge.

I anticipate our first offensive move through market sources will be propping up 5x86 P75 pricing. This will be followed by validation of 5k86 compatibility. Although, user groups with whom I work consider compatibility a given. "AMD products are high quality, thus AMD products are compatible". Mass market movement at our hand and on this scale has dramatic competitive implications. I have found that historically Intel will go to great extent to stop it. Always be aware of the potential of Intel Inside AMD. They will use us at AMD's expense.

Subsequently, user group findings will support AMD credibility on the compatibility front, can be leveraged as long awaited proof to industry nay-sayers, among the unknowing and with the general mass market. In short, AMD does not fall into the trap of becoming sole spokesmen for its efforts. And, can buttresses depositioning among editors and analysts who are ill informed, have off-point view, are simple pragmatists given Intel's incredible

momentum or on Intel's take. Graft is a key motivator in Intel's competitive arsenal. Foil sets previously forward to your attention cover methods I've encountered. They are the surest way to kill camp marketing efforts and fledging momentum on the user group front. Through bottom up effort, NexGen turned around the Nx586, fueled the U.S. channel and conquered performance Vs. Pentium pin-out conceptual barriers in four short months. U.S. sales ramped even under AMD depositioning of Nx586 through cancellation. Imagine what we can accomplish with AMD resource. This is the power of camp marketing. Nx586 has a market that was made. Final proof can be found in the sale of the last 12,000 units verse sending them to the scrap heap. Intel has been observing judiciously. Intel will utilize extreme means to stop this program.

✓ A step up. By coordinating our constituencies across camps to achieve alignment we will gain an ability to neutralize the affects of Intel Inside on our immediate path. *I'd like to know what our path is from your perspective.* Top down market manipulation funded by "Intel Inside" of all kinds is no match for camp members who say no or differ in view. Especially when they can be motivated to paint a successful history and frame our position before industry observers are given the liberty. *What history do we need to paint right now?* Happenings in the trenches for May will take a few stabs at recommendations on the corporate, channel and product fronts. Strategic positioning will be proposed based on market perception from my field work.

For Cyrix, at an earlier stage of competitive escalation, programs to align across camps by a team of three under my direction neutralized the affects of Intel Inside entirely on a national scale. Moving forward there will be similar moments in time when AMD camps can set, frame and hold our position. As they do, camp members at various levels of the architectural hierarchy will swarm our primary competitors on multiple fronts and their position will become mute. AMD will then dominate for as long our position is sustainable. Or, until we can again toggle competitive position through minor moves among "mass market" camps at the bottom of the food chain.

During periods in which AMD achieves product positions, no matter how leading, segmented or categorized, chips will flow freely given this method in both velocity and varying volume. The secret is to secure market support, customer intimacy and AMD defined alignment across camps first. Today, I view this as strategic set up for K6. Its called build the dam, fill it up with pent up demand then open the flood gates for major OEMs. Networking among the Directors will broaden my view as to where this makes sense given the breadth of AMD product lines.

Market alignment across camps will result in a lethal weapon. So much so that during moments of technical leadership, in any given product segment or category, sheer mass inherent among supportive constituencies will block competitive counters. This is the mass of architectural and corporate stability. This mass will neutralize the effectiveness of

Rob Herb

Vice President Strategic Marketing

4

✓ Intel Inside and paralyze Intel's ability to manipulate the market. Intel competitive response will ensue. This is when things really get interesting.

Envision a wave launching onto the beach and rolling up onto the sand. In the after mass a transition occurs when the wave's momentum onto the beach is temporarily lost. The rush of product development up the beach through hand off to product launch. At the precise moment the tide turns, a chasm occurs. This chasm can be crossed through the bridge of market development. Market development to stimulate end user pull in parallel with OEM development and in advance of camp push. At launch, AMD market momentum will then build in scope and velocity as water rushes faster and faster back toward the sea. At the moment camp velocity from launch impacts mass market sea an eruption will occur. The market will echo back at us. This echo will then shoot all the way back up AMD's architectural hierarchy. It is at this point AMD must be best positioned to reap the rewards of unlimited design-in opportunity. This is what camp marketing can do at the highest level.