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**FLORIDA ANTITRUST ACT  
CIVIL INVESTIGATIVE DEMAND**

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**U. S. Plastics Pact**

**Demand No. 26-031**

**TO: U. S. Plastics Pact  
C/O Jonathon Quinn  
P.O. Box 772  
Walpole, NH 03608**

**(Or Such Other Address as  
Service Can be Made)**

**THIS CIVIL INVESTIGATIVE DEMAND** is issued under Section 542.28(1), *Florida Statutes*, in the course and authority of an official investigation to determine whether there is, has been, or may be a violation of Chapter 542, *Florida Statutes*, the Florida Antitrust Act of 1980, by conduct or activities of the following nature:

**Agreements that unreasonably restrain trade and result in increased costs,  
reduced output and reduced quality of goods and services.**

**YOU ARE HEREBY COMMANDED** to produce the documents described in Attachment A of this CIVIL INVESTIGATIVE DEMAND. You are required to search for and produce all materials in accordance with the definitions and instructions contained therein. You are required to produce the documents described to Steven Orban, Assistant Attorney General, or his designee at or before 5:00 PM, May 26, 2026.

**YOU ARE HEREBY COMMANDED** to answer the interrogatories on Attachment B of this CIVIL INVESTIGATIVE DEMAND in accordance with the definitions and instructions contained therein. You are required to furnish written answers to the interrogatories to Steven Orban, Assistant Attorney General, or his designee at or before 5:00 PM, May 26, 2026.

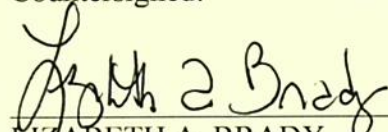
You must attest to your compliance in the form printed on the reverse side of this document, which shall be executed by the person to whom this document is directed, or, if not directed to a natural person, by a person having knowledge of the facts and circumstances relating thereto.

Please note Section 542.28(1), *Florida Statutes*, and Section 837.02, *Florida Statutes*, printed on the reverse side of this document.

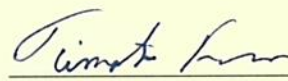
Issued at Tallahassee, Florida, this 21st day of April 2026.

**JAMES UTHMEIER  
ATTORNEY GENERAL**

Countersigned:

  
LIZABETH A. BRADY  
Director, Antitrust Division

By:

  
TIMOTHY FRASER  
Special Counsel

**FORM OF CERTIFICATE OF COMPLIANCE**

I have read the provisions of Section 542.28(1), *Florida Statutes*, and do hereby certify that all information required by this CIVIL INVESTIGATIVE DEMAND No. **26-031**, which is in the possession, custody, control or knowledge of the person to whom the CIVIL INVESTIGATIVE DEMAND is directed, has been submitted to Steven Orban, Assistant Attorney General.

Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

Sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_ 2026.

\_\_\_\_\_  
Notary Public

\_\_\_\_\_

**542.28 Civil investigative demand.—**

- (1) Whenever the Attorney General, or a state attorney with appropriate jurisdiction and with the written consent of the Attorney General, has reason to believe that any person may be in possession, custody, or control of any documentary material, or may have any information, which documentary material or information is relevant to a civil antitrust investigation authorized by s. 542.27(3), the Attorney General or such state attorney may, prior to the institution of a civil or criminal proceeding thereon, issue in writing and cause to be served upon such person a civil investigative demand requiring such person to:
- (a) Produce such documentary material for inspection and copying or reproduction;
  - (b) Answer, under oath and in writing, written interrogatories;
  - (c) Give sworn oral testimony concerning the documentary material or information; or
  - (d) Furnish any combination of such material, answers, or testimony

**837.02 Perjury in official proceedings**

- (1) . . . [W]hoever makes a false statement, which he or she does not believe to be true, under oath in an official proceeding in regard to any material matter, commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.
- ....
- (3) Knowledge of the materiality of the statement is not an element of the crime of perjury under subsection (1) . . . and the defendant’s mistaken belief that the statement was not material is not a defense.

If you believe that any part of this CIVIL INVESTIGATIVE DEMAND can be narrowed in any way that is consistent with this Office’s need for information, you are encouraged to discuss possible modifications with:

**Steven Orban, Assistant Attorney General**  
PL-01, The Capitol  
Tallahassee, FL 32399-1050  
(850) 414-3300

## ATTACHMENT A

### **PRODUCTION OF DOCUMENTS**

#### DEFINITIONS

1. “Agreement(s)” means any oral or written contract, arrangement, or understanding, tacit or express, whether formal or informal, between two or more Persons, together with all modifications or amendments thereto.

2. “Communication(s)” means any exchange, transfer, or dissemination of information, regardless of the means or medium by which it is accomplished.

3. “Document(s)” as used in these requests is defined as data or information in any tangible form, including, but not limited to, the original and any non-identical copy (which is different from the original because of notations on such copies or otherwise) of all correspondence, telegrams, teletype messages, faxes, contracts (including drafts, proposals and any and all exhibits thereto), draft minutes and agendas, memoranda (including white papers, Hart-Scott-Rodino filings and submissions, inter- and intra- office memoranda, memoranda for file, pencil jottings, sticky notes, diary entries, desk calendar entries, reported recollections, and any other written form of notation of events or intentions), transcripts and recordings of conversations and telephone calls, books, records, presentation slides or notes, photographs, reports, tabulations, charts, books of account, ledgers, invoices, financial statements, purchase orders, receipts, canceled checks, computer files, data files, or any communications on any platforms, whether for ephemeral or non-ephemeral messaging, for email, chats, instant messages, text messages, and other methods of group and individual communication (e.g., Microsoft Teams, Slack), and all other documentary material of any nature whatsoever, together with any attachments thereto or enclosures therewith, as well as data or Communications stored, maintained or organized electronically or magnetically

through computer equipment. This definition includes Documents in electronic or magnetic form shall be obtained or translated, if necessary, by You into reasonable usable form. The term “Document” shall also include audio and/or video recordings.

4. “Each,” “any,” and “all” mean “each and every.” “Each” includes “every,” and vice versa.

5. “Explain” means to make something clear or understandable; to make plain or intelligible what is not immediately obvious or entirely known.

6. “Identify,” when used with respect to a person or entity, means information sufficient to allow employees of the Attorney General to determine the current contact information (name, home or business address, telephone number, email), and if not a natural person, the current contact information for Your point of contact with the entity or facility to be identified, as well as the relationship of that person or entity to You.

7. “Identify,” when used with respect to a fact or event, means information sufficient to allow employees of the Attorney General to determine the fact or event with reasonable particularity, and to identify each person believed to have knowledge about the fact or event and each document that refers or relates to the fact or event.

8. “Identify,” with regard to a Communication, means to state with specificity the date of the Communication; the medium of communication; the location of the Communication; the name(s) and alias(es) of the person(s) who made the Communication; and the name(s) and alias(es) of all persons who were present when the statement was made, who received the Communication, who heard the Communication, or who came to know of the content of the Communication at a later time.

9. “Including” means including but not limited to.

10. “Person” means any natural person, corporation, proprietorship, partnership, association, firm, or entity of any kind. A person is a “party to” a Communication if that person was the sender, speaker, or disseminator of the Communication; the person was a recipient (including via “cc” or “bcc”) or hearer of the Communication; or the Communication was otherwise disseminated to or received by the person.

11. “Problematic and Unnecessary Materials List” means the U.S. Plastics Pact’s Problematic and Unnecessary Materials List, as well as all prior iterations of the Problematic and Unnecessary Materials List and all other lists developed or distributed by the U.S. Plastics Pact for the purpose of identifying materials considered to be problematic or unnecessary.

12. “Relating” or “Relating to” means constituting, concerning, embodying, reflecting, identifying, regarding, describing, referring to, evidencing, discussing, connected with, bearing on, pertaining to, involved with, revealing, having to do with, or in any way relevant to a given subject.

13. “Relevant Period” - Unless otherwise indicated, You must produce all responsive Documents for the time period of August 1, 2020 to the date of the production of all Documents by You in response to this Civil Investigative Demand (“Relevant Period”). If a Document relates to the Relevant Period, it must be produced, regardless of when it came into being.

14. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this request all responses that might otherwise be construed to be outside of its scope.

15. The use of the singular form of any word includes the plural and vice versa. In addition, the use of any tense of any verb includes all other tenses of the verb.

16. “You” and “Your” mean the U.S. Plastics Pact, as well as all employees, officers, agents, board members, parent companies, subsidiaries, and corporate affiliates of the U.S. Plastics Pact.

## INSTRUCTIONS

1. This Civil Investigative Demand calls for the production of all responsive Documents in Your possession, custody, or control without regard to the physical location of said Documents.

2. If You do not possess any Documents responsive to a request, state this fact and specify the paragraph of this request to which it is responsive.

3. If You withhold any Documents based on a claim of privilege, provide a statement of the claim of privilege and all facts on which You rely in support of Your claim, including (a) author(s), (b) recipient(s), (c) date(s), (d) title(s), (e) subject matter(s) and (f) location(s) of the Document, and (g) the paragraph(s) of this Demand to which it is responsive. If You withhold any Documents based on a claim that they constitute or contain attorney work product, provide the information called for by (a)-(g) above and identify the litigation in connection with which the Document was prepared.

4. If the person to whom the attached Civil Investigative Demand is directed believes that any part of the Demand can be narrowed in any way that is consistent with this Office's needs, you are encouraged to discuss such questions and possible modifications with the representative of this Office identified in the Demand as the one to whom inquiries concerning compliance should be directed. All modifications to the attached Demand must be agreed to in writing by said representative.

5. The response to this request should be submitted in the following manner:

- a. Provide a cover letter with each production that identifies the volume(s) and includes the Bates range for the documents produced in each volume.
- b. Produce Microsoft Excel and other spreadsheet files (including delimited

text files), Microsoft Access files, and audio/video files in Native Format. Before producing data from structured data sources, consult with the representative of this Office identified herein as the one to whom inquiries concerning compliance should be directed on acceptable formats for the production of such data.

c. Produce all other documents as single page Group IV TIFF black and white files (one file per page) with an image resolution of 300 DPI. OCR files must be provided in a separate \TEXT\ directory containing Document level text files. If Foreign Language/Unicode text exists, TEXT files should be in appropriate UTF-8 or UTF-16 format.

d. Each production containing electronically stored information (ESI) must be accompanied by two Load/Unitization files.

e. The first load file must be a metadata import file in Concordance format with a .dat file extension that contains all metadata fields listed in Table 1, below, to the extent applicable.

f. The first load file must use standard Concordance delimiters:

- i. Comma - ¶ (ASCII 20);
- ii. Quote - ¨ (ASCII 254);
- iii. Newline - ® (ASCII 174).

g. The second load file must be a cross-reference file that contains the corresponding image information identifying the document breaks. The acceptable formats for the cross-reference files are .log and .opt.

h. All attachments and embedded files must sequentially follow the parent document.

**TABLE 1**

<b>Field Name</b>	<b>Description</b>
BegBates	Beginning Bates Number.
EndBates	Ending Bates Number.
BegAttach	Beginning Bates Number of the first document in a document family range. (Only populated for documents that are part of document families, i.e., containing parents or attachments)
EndAttach	Ending Bates number of the last document in attachment range in a document family range. (Only populated for documents that are part of document families, i.e., containing parents or attachments)
AttachmentCount	Populated for email parent records and indicates the number of attachments that constitute the whole family (BegAttach to EndAttach).
Custodian	Name of the custodian of the document.
FileName	Filename of the original source ESI
EmailSubject	Subject line extracted from an email
Importance	Email importance flag
Title	Title field extracted from the metadata of non-email ESI
Author	Author field extracted from the metadata of non-email ESI
From	From or Sender field extracted from an email
To	To or Recipient field extracted from an email
CC	CC or Carbon Copy field extracted from an email
BCC	BCC or Blind Carbon Copy field extracted from an Email.
DateSent	Sent date of an Email (mm/dd/yyyy format).
TimeSent	Time of an Email (hh:mm:ss format).
DateReceived	Received date of an Email (mm/dd/yyyy format).
TimeReceived	Received time of an Email (hh:mm:ss format).
DateCreated	Creation date of a file (mm/dd/yyyy format).
TimeCreated	Creation time of a file (hh:mm:ss format).
DateLastModified	Last modification date (mm/dd/yyyy format).
TimeLastModified	Last modification time (hh:mm:ss format).
File Extension	File extension of Document (.msg, .doc, .xls, etc.)
Full Text	File path to full text/OCR File.
Confidentiality	Confidentiality level requested by producing party.
Message-ID	The Outlook Message ID assigned by the Outlook mail server, if applicable.
ConversationIndex	Unique alphanumeric identifier for an email conversation, which may be populated by the e-mail client for each outgoing message, if applicable.
PageCount	Number of pages in the file.
FileSize	Size of the file in bytes.
Application	Indicates software application that generated the ESI item (e.g., Outlook, Word)
Production Volume	Production volume name or number
SourceParty	The Producing Party.

## REQUESTS FOR PRODUCTION

You are required to produce the documents described to Steven Orban, Assistant Attorney General or his designee on or before 5:00 PM, May 26, 2026, at the following location:

OFFICE OF THE ATTORNEY GENERAL  
107 WEST GAINES STREET  
TALLAHASSEE, FL 32301

Your production must include an executed copy of the Certificate of Compliance located on the reverse side of the first page of this document.

You are commanded to produce the following documents or material:

1. Any communications with the Consumer Goods Forum, the Green Blue Institute, or the Sustainable Packaging Coalition.

2. The PCR Toolkit, the Design for Circularity Playbooks, Roadmap 2.0, the Framework USPP Journey to Film & Flex Circularity, the Report Reuse in Retail Initiative: Scoping Phase Report, the Reuse in Retail Initiative (RRI), the Target 3 Impact Assessment Report, The Responsible Production Guidelines for ACM Recycling, and the Problematic & Unnecessary Materials Report.

3. All Documents (Including Communications) Relating to the development, formulation, drafting, revision, dissemination, and implementation of the Problematic and Unnecessary Materials List, the U.S. Plastics Pact's Design for Recyclability Playbook, the U.S. Plastics Pact's Design for Reuse Playbook, or the U.S. Plastics Pact's Design for Compostability Playbook.

4. All Documents (Including Communications) Relating to potential, anticipated, or actual impacts of implementing the Problematic and Unnecessary Materials List, the U.S. Plastics Pact's Design for Recyclability Playbook, the U.S. Plastics Pact's Design for Reuse Playbook, or the U.S. Plastics Pact's Design for Compostability Playbook on product prices.

5. Documents sufficient to Identify all attendees at the U.S. Plastics Pact Activator Meeting held in Columbus, Ohio on November 11 – 12, 2025.
6. The Agenda for the U.S. Plastics Pact Activator Meeting held in Columbus, Ohio on November 11 – 12, 2025.
7. Documents sufficient to Identify attendees and subject matter of breakout sessions at the U.S. Plastics Pact Activator Meeting held in Columbus, Ohio on November 11 – 12, 2025.
8. Documents sufficient to Identify attendees at meetings to discuss the Roadmap 2.0 at the U.S. Plastics Pact Activator Meeting held in Columbus, Ohio on November 11 – 12, 2025.
9. All invitations, agendas, handouts, slide decks, and meeting minutes associated with the U.S. Plastics Pact Activator Meeting held in Columbus, Ohio on November 11 – 12, 2025.
10. Documents sufficient to show how the Solid Waste Association of North America partners with U. S. Plastics Pact to accelerate plastic packaging solutions.
11. All Documents Relating to any actual or projected increases in consumer price, decreases in output, decreases in innovation, and/or decreases in consumer choice.
12. Documents sufficient to Identify any agreements, contractual or otherwise, between You and any Activator and/or Activator Accelerator.
13. All voluntary reports from participating organizations that track aggregate progress toward shared goals referenced in Your letter of March 18, 2026, to the Florida Attorney General.
14. All Antitrust compliance materials and Communications Relating to them.

15. All document retention policies, Including Your electronic retention policies Relating to electronic media Including, but not limited to, email, Slack messages, and Microsoft Teams chats.

16. For each meeting, conference, conference call, and videoconference identified in response to Interrogatory number 10 below, produce all invitations, agendas, handouts, slide decks, and meeting minutes associated with the event, as well as Documents sufficient to Identify all attendees of such meeting, conference, or videoconference.

17. For each meeting, conference, conference call, and videoconference identified in response to Interrogatory 12 below, produce all invitations, agendas, handouts, slide decks, and meeting minutes associated with the event.

18. All Documents and Communications Relating to the October 29, 2025 letters sent by the Florida Office of the Attorney General to the U.S. Plastics Pact, Consumer Goods Forum, and the Green Blue Institute.

19. All Documents and Communications Relating to how the U.S. Plastics Pact determined the four “targets” that its members must reach by 2025 as identified in the October 29, 2025 letter from the Florida Attorney General to the U.S. Plastics Pact. This request includes all background materials, research relied on, and considerations Relating to these four “targets” and their respective impacts.

20. All Documents and Communications in which Your representatives made statements or representations Relating to the impacts, Including any actual or projected increases in consumer price, decreases in output, decreases in innovation, and/or decreases in consumer choice, of Your respective targets, goals, benefits, or any other objectives to Your members. This request Includes, for example, marketing or promotional materials; white papers and/or research

relied on; any internal Communications discussing the accuracy or viability of Your goals, benefits, or other objectives; and any disclaimers or clarifications made by You Relating to Your targets, goals, benefits, and/or objectives.

## **ATTACHMENT B**

### **INTERROGATORIES**

#### **DEFINITIONS**

1. The definitions from Attachment A, Production of Documents, above, are incorporated by reference.

#### **INSTRUCTIONS**

1. If You decline to answer any particular interrogatory, in whole or in part, under any claim of privilege, You are directed to file with the Attorney General a statement in writing under oath, and in such statement to: (a) Identify such interrogatory; (b) Describe its general subject matter; (c) Describe in detail the claimed constitutional or other legal right or privilege Your Company contends applies with respect to it; (d) State whether any claim of privilege has previously been made with respect to it; (e) If the answer to (d) is yes, if the claim of privilege previously made was challenged in any manner, describe the disposition made of each such claim; and (f) If the answer is privileged only in part, answer in full the non-privileged part.

2. If You are unable to fully answer any particular interrogatory, supply all of information currently available. Designate such incomplete information as incomplete and accompany the information with an explanation that includes: the reasons for the incomplete answer; a description of any and all Your efforts to obtain the information; and the source from which the Attorney General may obtain information to complete Your response. If books, records, or other sources that provide accurate answers are not available, provide Your best estimates and describe how You derived the estimates, including the sources or bases of such estimates. Designate estimated data as such by marking it with the "est." notation. If there is no reasonable way for You to make an estimate, provide an explanation.

## INTERROGATORIES

You are required to furnish written answers to the following interrogatories to Steven Urban, Assistant Attorney General or his designee on or before 5:00 PM on May 26, 2026, at the following location:

OFFICE OF THE ATTORNEY GENERAL  
SUITE 566  
107 WEST GAINES STREET  
TALLAHASSEE, FL 32301

Your answers must be provided under oath and accompanied by an executed copy of the Certificate of Compliance located on the reverse side of the first page of this document.

You are commanded to answer the following interrogatories:

1. Identify all past and present members of the U.S. Plastics Pact.
2. Explain how You convene, facilitate, and support collaboration across the packaging system as stated on Your website.
3. Explain how You, through structured engagement, have participants Identify shared challenges, test ideas, and develop practical approaches that reflect real-world complexity as stated on Your website.
4. Explain how work is shaped through cross-sector workstreams focused on priority issues through regular Activator engagement and feedback as stated on Your website.
5. Explain how technical workshops address shared challenges, and strategic input from advisory and sector-specific groups as stated on Your website.
6. Explain how “Real progress happens only when the full value chain works together—sharing costs, reducing friction, and designing solutions that truly work for consumers, retailers, brands, and supply chain operators” as stated on Your website.

7. Explain how You unite “stakeholders across the plastics value chain to eliminate plastic waste and accelerate the transition to a circular economy” as stated on the May 1, 2025 news release, <https://swanafl.org/swana-partners-with-the-us-plastics-pact/>.

8. Explain why “Bringing our US Plastics Pact Activators together in person was a top priority for 2025” as stated by Your CEO, Jonathon Quinn on the May 1, 2025 news release, <https://swanafl.org/swana-partners-with-the-us-plastics-pact/>.

9. Identify activities that You participate in that are not “primarily informational,” as indicated in Your letter of March 18, 2026, to the Florida Attorney General.

10. Identify every meeting, conference, conference call, and videoconference associated with the Problematic and Unnecessary Materials List, the U.S. Plastics Pact’s Design for Recyclability Playbook, the U.S. Plastics Pact’s Design for Reuse Playbook, or the U.S. Plastics Pact’s Design for Compostability Playbook.

11. Identify every person (Including entities) who has agreed to implement or abide by any portion of the Problematic and Unnecessary Materials List, the U.S. Plastics Pact’s Design for Recyclability Playbook, the U.S. Plastics Pact’s Design for Reuse Playbook, or the U.S. Plastics Pact’s Design for Compostability Playbook. For each such person, produce all Documents Relating to or reflecting the person’s agreement to implement or abide by the relevant document.

12. Identify every meeting, conference, conference call, and videoconference associated with the Consumer Goods Forum or the Sustainable Packaging Coalition that any of Your personnel attended.

13. Explain how “stakeholders routinely work together to develop shared technical standards, guidance and frameworks,” as indicated in Your letter of March 18, 2026, to the Florida Attorney General.

14. Identify the individuals responsible for providing Documents and Information responsive to this Civil Investigative Demand, and for each such individual, Identify the specific demands to which the individual contributed Documents or Information.