

Background Information

Nebula Glass International D.B.A Glasslam is a Pompano Beach, Florida-based company that was founded in 1983 to service the glass and window industries by supplying resin products for the production of laminated and decorative door glass. In 2007 Glasslam decided to enter the warm edge foam spacer market, producing a product that increases the energy efficiency of insulating glass units and window products. Glasslam has further developed a patent-pending, second generation foam spacer named SmartEdge™, making insulating glass easier and more cost-effective to manufacture than with other products.

Edgetech I.G. Inc. is a Cambridge, Ohio-based company which recently advertised their twentieth anniversary of manufacturing and selling a foam spacer product they call Super Spacer®.

IGCC (Insulating Glass Certification Council) is an insulating glass certification council run by AMS (Administrative Management Systems) from Sackets Harbor, New York. AMS also administers the North American IGMA (Insulating Glass Manufacturers Alliance) certification program.

IGMA is a trade organization representing both insulating glass manufacturers and suppliers of materials for such. This trade organization also administers the Canadian IGMAC (Insulating Glass Manufacturers Association of Canada) certification program.

Insulating glass units are hermetically sealed pieces of glass which provide superior thermal performance as compared to a single-glazed piece of glass. The glass panes are separated by a spacer which creates an air space, providing a significant thermal conductivity improvement. Options including inert gasses in the space between the glass and coatings on the glass surfaces can greatly improve the energy efficiency of insulating glass units. Foam spacers, because of their non-metal construction, also decrease thermal conductivity and increase the energy-saving characteristics of an insulating glass unit. The EPA-run Energy Star Window program and the American Recovery And Reinvestment Tax Act (ARRA) of 2009 today highlight high performance insulating glass.

Glasslam began developing its Air-Tight™ spacer products in the summer of 2007 and unveiled sample material at the GlassBuild Show in September of 2007 in Atlanta, GA. After there was such a positive response for the product, plans for a small production

line making a few million feet per year were replaced by a larger investment in a facility with 8 production lines and hundreds of millions of feet in capacity. Glasslam chose to produce its first foam spacer using a material called EPDM (Ethylene Propylene Diene Monomer), rubber similar to Edgetech's most popular foam spacer at the time.

Edgetech IG, at that time was producing three different versions of Super Spacer® - silicone, EPDM and a hybrid thermoplastic foam called nXt™. Edgetech IG refers to its EPDM product as Super Spacer® Standard. Edgetech IG was the only company in North America supplying a foam spacer product and had patent advantage until 2006.

To ensure customers of the product quality of their insulating glass units, most glass insulators participate in one of five different certification programs in North America. These five programs are also recognized by the National Fenestration Rating Council (NFRC) as the only third party programs that are allowed to become Energy Star-rated materials. They are:

Associated Labs (ALI), Insulating Glass Certification Council (IGCC/IGMA), Insulating Glass Manufacturers Alliance (IGMAC), Keystone Certifications (KCI) and the National Accreditation & Management Institute (NAMI). Participants in these programs detail the use of the components in their insulating glass production and are required to use approved proprietary or generic products. Certification by one of these third party organizations will be required starting July 1, 2010 in order to be rated an Energy Star supplier by the NFRC.

Two popular relevant certification programs for insulating glass are the IGCC/IGMA program for the United States and the IGMAC program for Canada. IGMA was formed in 2000 when IGMAC and SIGMA (Sealed Insulating Glass Manufacturers Association) merged. Both the IGMAC program and the IGCC/IGMA program have guidelines and policies to lead manufacturers in the rules for what components and materials may be interchanged or tested.

Going to Market, the EPDM Debacle & Certification Conspiracy

Glasslam showed its prototype EPDM Air-Tight™ the Generic at Glassbuild 2007 and because of the "Generic" nature of the product, placed the small samples in prescription drug bottles. This was quite a marketing hit at the show, and these small bottles found their way all over the world. Edgetech IG amazingly had the tiny samples laboratory tested, showing up at the Toronto WinDoor show on November 14, 2007 where their Executive Vice President of Sales, Larry Johnson, told Glasslam personnel that "there's no way you'll be able to sell that stuff in the market or pass the testing with all those volatiles." For the first time in their history, Edgetech IG had a competitor on the horizon. Glasslam CEO Steve Howes responded to Johnson's antics with a tongue-in-cheek holiday email in 2007:

Subject: your unprofessional response to competition
From: "Steve Howes" <showes@glasslam.com>
Date: 12/19/2007 8:42 PM

Dear, Mr. Johnson.

I have been receiving several reports of you personally bad mouthing me and my company over the last few months and even coming on to my companies booth in Canada with your badge turned backwards (are you embarrassed by who you are, or who you work for?)and bad mouthed our product, without any knowledge of the finished spacer. Do you think, after an eight million dollar investment we will put a product on to the market without testing and ensuring it is at least as good as other products we will need to compete with.? Glasslam has been in business for over twenty six years and I have been in the window industry for forty years this year, so I have learned at least the basics of the industry.

The reason we entered the spacer biz was in direct response to your company entering the resin laminating industry. After many years of recommending superspacer to our licensees in our decorative and hurricane products you decided to try and take the resin sales away from these very same customers.

I told you in Las Vegas I thought that was despicable and was told " It's Just Business".

Until now I have responded in a professional way with a large investment and a competitive response but you have taken the gloves off and turned it personal. I absolutely love a challenge and now make this promise to you, to work twice as hard this coming year.

Happy new year to you.
Steve Howes

Glasslam began construction on their new spacer plant late in 2007, and the company also began perfecting the production process, which consisted of bringing in mass quantities of EPDM rubber, extruding it into the correct shape, sending the material through a salt bath, and baking out potential volatiles in an oven operation. Finishing of the product involved the application of a Mylar moisture barrier and side adhesive tape with liner. Nearing the completion of the plant, Glasslam flew in its manufacturer's representative group in on April 21, 2008 to view the facility and ready them for the sales push that would occur later in the year.

As Glasslam was working on construction of its new plant to manufacture spacer products, Edgetech IG was already taking steps to hinder Glasslam's entry in the market. The Insulating Glass Certification Council (IGCC) is the certifying body in the United States for the Insulating Glass Manufacturers Alliance (IGMA). During a May 13-14, 2008 IGCC Certification Meeting Edgetech was very well represented. Representing Edgetech at this meeting were Certification Committee Chairman, Certification Appeals Committee Chairman and Nominations Committee Chairman Joe Erb, Tracy Rogers and Gerhard Reichert. Five members representing Public Interest were also in attendance as well as 8 certified product members, 4 other suppliers and 7 guests and staff (including Margaret Webb of IGMA/IGMAC). Notable in this meeting was a review of the IGCC's Golden Rules, which include the following entries: "Test what you produce,

test units shall be representative of normal production." "Generic, non-proprietary product descriptions." Later in this document we will show how the leaders of IGCC from Edgetech IG ignore the Golden Rules of the organization they belong to and the committees they chair.

Up until this May, 2008 meeting spacer equivalency was interpreted by the IGCC's Procedural Guidelines:

12.0 CERTIFICATION GUIDELINES AND INTERPRETATIONS

For guidance in labeling and certifying sealed insulating glass units the Certification Committee has adopted the following:

ALWAYS

12.1 *The following situations permit the licensee to **always** certify the sealed insulating glass units with the same IGCC®/IGMA® number.*

A.SP.4

Any change in supplier of spacer from that tested, everything remaining the same.

Glasslam was well on its way to producing a spacer almost identical to the Edgetech IG Super Spacer® Standard, certainly qualifying under A.SP.4 "everything remaining the same."

During this meeting a "minute" was produced by the Erb-led Certification Committee that became the method Edgetech IG and their willing accomplices on the Committee used to prevent competition in the FS category. Minute **5.14.08.6** reads "**Can one spacer system be equivalent to another? The consensus of the group was "No." Each must be considered on a case-by case basis. The sub-committee was requested to further work on criteria for how two systems *might* be evaluated for equivalency.**" There was no vote, and there was no decisive action in the Committee. Yet, IGCC Administrator John Kent uses this minute as gospel in the following 10/23/09 email:

Matt, one final question you raised in your e-mail of October 22, 2009 at 3:32 PM is "Can a customer switch from a FS product they have used and certified with to our product". I respond by saying that my direction from the IGCC Certification Committee is as follows:

"Per minute 5.14.08.6 at present there is no equivalency between spacer systems. Each system is viewed as a unique product to be used in a separately certified IG model."

Edgetech has exhibited the last several years at the Glass trade shows (GlassBuild America) with a booth designed around Testing and certification of insulating glass and window products. They had representatives from various Trade organizations and certification bodies present on their stand. This gave the impression of a company fully supporting testing to the rules of the industry they serve. At the same time, they continued to help customers, ie, insulating glass fabricators, lie and cheat under the

same rules. They have also been caught defrauding the Federal government (ARRA Law) and/or the AMS-managed certification programs (IGMA and IGCC). This has been communicated various times to John Kent of AMS and their Legal counsel, and we feel it has been ignored as this blatant cheating continues. Both IGMA and IGCC seem more intent to conspire to help Edgetech illegally monopolize an industry rather than to abide by their own rules of thirty years.

IGMA, which administers the Canadian IGMAC certification program, similarly has chosen to ignore their own rules to aid Edgetech in the market. The organization has changed its own rules to stop competition. Margaret Webb, the IGMAC Administrator, and their legal council were told of the cheating by Edgetech and have continued to ignore it.

The same week that the IGCC developed its fraudulent "Minute 5.14.08.6", Mr. Johnson of Edgetech IG confronted our sales representative at the Boston American Institute of Architects Show on May 15, 2008 and threatened that "he was going to bury Glasslam, and go into all the accounts we try to "turn" and offer the newer and less expensive products." The obsession with preventing Glasslam from competing with Edgetech IG had clearly begun.

-----Original Message-----

From: xxxxxxxxxxxxxxxxxxxx

Date: Thu, 15 May 2008 17:45:16

To: "xxxxxxxxx" <xxxxxxxxxxxxxxxxx>

Subject: LJ

Just ran into Larry Johnson in Boston at the AIA show. In a matter of 5 minutes he told me - he was going to bury Glasslam, and go into all the accounts we try to "turn" and offer the newer and less expensive products - suggest that Steve lost law suits to ODL and Jeldwin and set up the company in the Bahamas so that when the seal failures occur, he can't get sued - said that the testing Glasslam has done so far has been done with Superspacer and not the glasslam product. - didn't have too many nice things to say about Matt and a company called Arch Aluminum.

Steve has really gotten under his skin.

Imagine if we spent more than 5 minutes together?

XXXX

Glasslam is a Florida registered company and has been for 26 years.

In the fall of 2006, Edgetech IG informed one of its founders and one of the inventors of its product, Super Spacer®, that it was going to reinterpret its agreement with him, drastically reducing the amount of money due him for the invention and the recent worldwide growth in its sales. Due to this action, Gerhard Reichert left the company in 2008 and was seeking employment for the first time since co-founding Edgetech IG in 1985. Glasslam took this opportunity to bring on board one of the world's most

qualified insulating glass experts. Gerhard Reichert joined Glasslam as President on September 8, 2008.

The official opening of Glasslam's spacer plant occurred early in 2009. Glasslam began selling its product and heard many stories from customers, representatives and ex-Edgetech IG employees that Edgetech switched products to make sure that their customers tested their Premium Silicone spacer whenever their EPDM Standard product failed certification testing, although the company sold products with three different compositions. They apparently felt and acted as if there was one category of foam spacer. They routinely exchanged Silicone product for EPDM in testing so that the product would pass the chemical UV /fog test. This was occurring while Edgetech IG personnel chaired committees of the IGCC with Golden Rules that state: "Test what you produce, test units shall be representative of normal production."

On October 2, 2009, Edgetech IG President Mike Hovan (pictured to the right with Glasslam's Steve Howes) visited the Glasslam GlassBuild booth in Atlanta, acknowledged their EPDM failed testing and stated, "we wondered how long it would take you to figure that out." Mr. Hovan was responding to a question as to why Edgetech IG would show photographs to customers of Glasslam spacer failing a fog test when their own did the same thing. Edgetech IG had shown failed Glasslam EPDM spacer photos at the Canadian Window & Door Manufacturers Association Meeting on Prince Edward Island June 4 – 7, 2009.



Here is an email from an ex-Edgetech IG employee:

From: XXXXXXXXXX [XXXXXXXXXX@yahoo.com]
Sent: Thursday, October 22, 2009 10:41 PM
To: Gerhard Reichert
Subject: Re: IGMA/IGMAC

Gerhard,
I don't recall which customers tested fogging with silicone foam spacer in place of EPDM foam spacer. All that I can say is that it was Edgetech's interpretation of the test standards that silicone foam spacer and EPDM foam spacer were not differentiated in the standards or the test reports, therefore customers could use them interchangeably for certified testing. For example: If customer X manufactures IG using EPDM foam spacer, then they can use silicone foam spacer in IG bound for certification testing. This practice suggests that foamed rubber spacer is foamed rubber spacer. However, different spacer base materials, color additives and sizes can perform quite differently.
Regards,
XXXXXXXXXXXX

On February 4, 2010, Glasslam Air-Tight Sales Manager Matt Hale met with Islam Moustafa, Manager at Laserseal Insulating Glass Ltd. in Concord, Ontario. His company uses Edgetech IG EPDM spacer. They are going to test units for certification in the IGMAC program. Mr. Moustafa told Mr. Hale that Edgetech IG's Toronto representative (Andrew Moore) told him he wanted to send them Edgetech IG Silicone Super Spacer® so that they would pass the Volatile Fog test (even though they use EPDM for their production).

The evidence is clear that Edgetech IG has been fraudulently using leadership positions in IGCC/IGMA/IGMAC to both violate honest certification of insulating glass units and deter competition by blocking rulings of equivalency of Glasslam's products in the market.

Most insulating glass units in Canada are certified in the Insulating Glass Manufacturers Alliance (IGMAC) program. The barrier to entry in the market for a new supplier also exists there. Glasslam was told by IGMAC Administrator and IGMA Executive Director Margaret Webb that all she needed to grant equivalency was a document showing material equivalency and a test result demonstrating that. Glasslam's president is the inventor of the original foam spacer product and certainly has provided Ms. Webb all the material documentation for equivalency. On January 15, 2009 (one day after IGMAC submitted a bulletin that was never sent to Glasslam), Edgetech IG representatives sent out the following email to ALL, (customers in Canada).

From: rjtoker@live.ca [mailto:rjtoker@live.ca] On Behalf Of Roland Toker
Sent: January 15, 2010 2:54 PM
Subject: IGMAC Component Equivalency Requirements

All,

Concern has recently been raised regarding Glasslam representatives in western Canada who are informing ET customers that Glasslam's EPDM spacer product can be switched for Edgetech products with no performance testing required and no consequence on IGMAC certification. In a word, this is false.

While certain accommodations have been made under the IGCC/IGMA program to allow for spacer system substitution, this is not the case for the IGMAC program. As outlined in the attached memorandum from IGMA Executive Director, Margaret Webb, there is only one way to substitute one spacer system for another within the same generic type:

"Component equivalency is granted based on two main criteria:

- 1. The new component must have the same material properties as the generic category components. The component supplier provides the material properties sheet and any testing results. Material equivalencies are determined through chemical and technical review.**
- 2. At least one product line must have gone through the certification program process and successfully met all program requirements.**

Both of these conditions must have been met in order for a component to be considered equivalent to existing components in the same generic category. This applies to desiccants, sealants and spacers."

While par. G.7 states that suppliers can be changed without retesting or Waiver of Retest, this is only for products that have been deemed equivalent. Glasslam has not provided any test data demonstrating the capability for their products to pass either ASTM E2190 or CAN/CGSB 12.8. Accordingly and until a technical review is complete and an IGMAC licensee has an IG product certified with a Glasslam product, there is no means by which a Glasslam product can be substituted for an Edgetech product.

This memorandum is being distributed by IGMA to all IGMAC licensees and may be shared with any of your customers for general information. Please let me know if you have any questions or need any additional information.

Regards,

**Tracy G. Rogers
Technical Director
Edgetech IG, Inc. - Celebrating 20+ Years in Business!**

We're there for you at every turn! 360™

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A Lauren International Company

On January 24, Ms. Webb sent out another revised memo, which added a requirement for 4 CGSB 12.8 test sets (a requirement that would take 24 weeks per test).

2. The new component has a history of passing the quality control and testing requirements of the IGMAC Certification Program. At least four test sets must be submitted by different program participants. Of the four sets submitted, only one test set failure is permitted. This ratio is based on the historical annual performance of submitted test sets.

The circular logic in the above guideline defies description and places an absurd burden on a manufacturer making a quality product which seeks a level playing field. The guideline also seeks to stop competition.

On February 8, 2010, Ms. Webb revoked the 1/24/10 and the 1/14/10 memos, asking the industry for help. But the damage of the Edgetech IG email to the industry remains. Many manufacturers in Canada have told Glasslam that they cannot purchase our products because of confusion in the requirements of the IGMAC certification program.

Glasslam is convinced of a conspiracy between Edgetech IG and the leadership of IGCC/IGMA/IGMAC. This conspiracy has damaged and continues to damage Glasslam as it fights to get its spacer products into the North American market. We ask for an

investigation into the communications between IGCC/IGMA/IGMAC committees and representatives of Edgetech IG. We feel this investigation will show an ongoing conspiracy to depress competition at the expense of purchasers of spacer products and ultimately consumers. We also have clearly identified how Edgetech IG has defrauded the U.S. and Canadian governments by publishing errant information on the energy efficiency of their products, leading to unjustified tax credits.

Edgetech Changes Products, Deceives Industry

On September 30, 2009 Edgetech IG made the following public announcement:

Edgetech I.G. Announces Improved Thermal Conductivity Numbers for Entire Super Spacer® Product Line

Sep. 30, 2009

Product enhancements help customers achieve lowered U-values and improved condensation resistance

As the industry continues to seek optimal energy efficiency and sustainability to meet increasingly stringent standards, Edgetech I.G. has announced enhancements to its already industry-leading Super Spacer® products that provide lowered U-values and improved condensation resistance. These enhancements are incorporated into Super Spacer Standard, Premium, Premium Plus, nXt™ and TriSeal™.

K = thermal conductivity Keff = effective thermal conductivity of a composite component/system			
Product	Previous Keff (W/m·K)	Improved Keff (W/m·K)	Percentage % of Improvement
Super Spacer® Premium	0.159	0.102	36%
Super Spacer® Standard	0.162	0.127	22%
Super Spacer® nXt™	0.151	0.114	25%
Super Spacer® TriSeal™ Premium	(New Product)	0.108	(New Product)

“The enhanced products are already being shipped, and customers can expect to receive the immediate benefits without having to recertify their IG,” said Larry Johnson, executive vice president, Edgetech I.G. “It’s just another way Edgetech is helping customers meet the new ENERGY STAR® requirements and take advantage of the flurry of activity surrounding the tax credit for energy-efficient home improvements.”

THE LOWEST U-Value Among Dual-Seal Systems All spacers tested with Butyl	U-Value Btu/h·ft²·°F	SHGC
Super Spacer® Premium	0.270	0.261
Super Spacer® Standard	0.271	0.261
Super Spacer® nXt™	0.270	0.261
Super Spacer® TriSeal™ Premium	0.278	0.258
Duralite™	0.276	0.260
Intercept® ULTRA	0.278	0.261

Simulations performed by Enermodal Engineering Ltd. Using Window 5.2 and Therm 5.2 as per NFRC 100-2001. Outside temperature 0°F, inside temperature 70°F. Low-e glass Cardinal Low-e® 356. Air spaces .500" wide, 90% argon fill. IGUs 24" x 48". Super Spacer® is a registered trademark of Edgetech I.G. Inc. Duralite™ is a trademark of Thermal Technologies, Inc. Intercept® is a registered trademark of GEO Integrated Solutions.

According to third-party testing, the entire Super Spacer product line now offers up to 36 percent lower thermal conductivity numbers, providing the warmest edge of glass available. The lowered thermal conductivity numbers also translate to improved condensation resistance, which reduces the risk of mold in the home and contributes to the overall durability and sustainability of IG.

“Super Spacer products have always offered provided superior energy efficiency and long-term durability,” Johnson said. “From our Standard and Premium Plus products to nXt, customers can be assured their products will meet and exceed today’s requirements.”

The new thermal conductivity numbers are now included in the NFRC 101 Appendix C “Manufacturer Specific Thermophysical Property Values of Materials” available at www.nfrc.org. A comparative chart is also available at www.edgetech360.com.

This public announcement was certainly exciting news for an industry that was hungry for ways to increase energy efficiency. Edgetech IG immediately updated their performance entries in the NFRC 101 database of materials that companies use to model their window unit's performance. They also removed the existing higher density and desiccant versions from that same list. Consumers who buy window products can earn tax credits from the U.S. and Canadian governments by purchasing windows with improved energy performance. So Edgetech's improved thermal performance in NFRC 101 library is the only value a window manufacturer can simulate their U-Factor with, and therefore a consumer could depend upon when calculating whether or not they were eligible for a tax benefit. This deception could bankrupt manufacturers who unknowingly put defective, untested product in the field with high performance glass required for energy rebates, wrongly thinking the product has the same long term performance that the original version had.

Another problem with Edgetech's announcement is that the new products show a decrease in density of the spacer by as much as 37%, meaning that the amount of desiccant in the spacer would also have suffered a decrease of as much as 37%. This violates the IGCC/IGMA rules:

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A manufacturer may use the same IGCC®/IGMA® number for units fabricated having airspace equal to, or greater than ¼ inch, provided the weight of desiccant per inch of perimeter edge remains the same or is greater than the model tested. On units fabricated having 3/16 inch air spaces, a manufacturer may use the same certification number, provided the manufacturer maintains the same weight of desiccant per inch of perimeter Edge, or as close to that value as possible. (Modified 7/28/99)

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A licensee may change supplier of desiccant matrix provided that the licensee 1) immediately informs the administrator of the change, 2) provides written documentation that the adsorption capacity per perimeter edge of seal is equal to or greater than the matrix used in the original model, and 3) prepares test specimens at the time of the next scheduled inspection. (Adopted 4/29/97)

When confronted with this inconsistency during an IGCC Conference call on 10/13/09, Edgetech IG Technical Director Tracy Rogers claimed that his company was not shipping the lower desiccant material to any IGCC certified customers. He later told IGCC Administrator John Kent, who forwarded on to Glasslam in a 10/26/09 email:

"Short term Edgetech has assured me that the lower density products have not been sold to customer's currently certifying IG under the IGCC/IGMA certification program. Although the old and new density products are intended to be sold under the same trade names (models), a numbering or ID system does exist that will differentiate the old from the new. Should the need arise, the numbering system should allow us to validate actual product used in plants. If you are aware of situations contrary to this, I invite you to provide actionable information.

If Mr. Rogers told the truth, Third Party Simulators are forced to use the lower numbers in their calculations for IGCC/IGMA customers still receiving the higher conductivity products. Those IGCC/IGMA customers therefore are falsely claiming performance numbers that result in **Federal tax rebates**. This is fraud to both the USA and CANADIAN Taxpayers. If Edgetech is shipping the new material to all customers, Mr. Rogers lied to the IGCC, and according to IGCC guidelines, all Edgetech IG certified accounts should have had their certification revoked. In any event Edgetech IG has either misled the IGCC Certification Committee (which they chair) or the U.S. and Canadian governments. The irony in this Edgetech IG change is that by removing desiccant and adding air with aerogel (and therefore reducing unit life) by as much as 37%, the units must be replaced (remanufactured) much sooner, leading to much more energy usage than before the change. It is known in the industry that the volume of active desiccant in an Insulating glass unit is proportional to the longevity of the unit.

Pressure and Conspiracy

One of the most damaging tactics Edgetech IG has used to prevent competition from Glasslam in the insulating glass market has been the behind-the-scenes pressuring of essential raw material and component suppliers. We feel these actions represent a clear example of a **coercive monopoly** and violate the Sherman Antitrust Act.

One of the most egregious was at the very beginning of Glasslam's development of an EPDM foam spacer. Gold Key Processing Ltd. Of Middlefield, OH was an early contact and supplier of Glasslam during the development of the EPDM spacer program. An Edgetech employee, or parent company director, contacted Gold Key's management threatening that should they help or support Glasslam's efforts in developing a competitive EPDM product, Edgetech IG would retaliate by eliminating or decreasing Gold Key purchases from Edgetech's parent company, Lauren International of New Philadelphia, OH. Specific details of the Edgetech contacts and the Gold Key personnel involved are available upon request.

A very important component in the finished foam spacer product is the adhesive, which adheres to glass in an insulating unit. Glasslam also found that Edgetech IG pressured and conspired with adhesive suppliers to prevent access to competitive product for spacer production. CCT Tapes of Philadelphia, refused to supply Glasslam product because of threats from Edgetech IG. Similarly, MACtac North America of Stow, OH stated that they could not supply Glasslam adhesive products because of pressure from their customer, Edgetech IG.

As Glasslam began to develop a silicone foam spacer product, it sought out silicone suppliers. Dow Corning, of Midland, MI, a long time supplier of Edgetech IG, communicated with Glasslam for months and months about potential supply, but there was always a developmental or formula snag delaying the commencement of a supply program. After months of labored excuses, representatives of Dow Corning admitted that they could not sell Glasslam because of pressure from Edgetech IG. Another silicone supplier, Wacker Chemie AG of Lehigh Valley, PA, disclosed similar threats and pressuring from Edgetech IG, but that company has chosen to go ahead and sell Glasslam silicone product. Specific contacts names; emails and details from Dow Corning and Wacker Chemie AG are available upon request.

Foam spacer usage has rapidly grown worldwide as equipment companies have embraced its use in automated insulating glass systems. Glasslam has also been made aware of pressures placed on equipment suppliers to stay away from working with or developing systems to use Glasslam products. One of the most obvious has been the Austrian company, Lisec (with U.S. offices in Burnsville, MN). Because of threats and conspiracy with Edgetech IG, Lisec personnel will not discuss equipment opportunities with Glasslam even during an unprecedented downturn in commercial glass construction and equipment sales. Another equipment manufacturer, Spadix, of Middlesex, NJ has worked closely with Glasslam on some equipment development projects for its spacer and resin products. One of their technicians was confronted by Edgetech IG personnel in an airport and told that he would be sued if he worked on any projects for Glasslam. He later received a legal letter with threatening language for supposedly giving out Edgetech secrets when in fact he was installing air float tables for Glasslam's patented resin laminated hurricane system. This system was purchased from Spadix at the Glass Build show.

There are two primary trade magazine groups in North America covering the glass and window industries. They are Key Communications, (which publishes *U.S. Glass* and *Door and Window Maker*), and the National Glass Association, (which publishes *Glass* and *Window and Door*.) Both of these companies also offer online versions of their publication as well as online news services for daily information and press releases for the industry. When Glasslam first began to send information to these publications with news of its new spacer initiative, there was immediate publishing and coverage. Because of heavy advertising and pressure by Edgetech, many recent Glasslam press releases and submitted information are never published by these groups. The National Glass Association is the largest trade association representing the flat glass industry. It is not just a simple magazine. And Key Communications employs as one of its editors the wife of Edgetech IG's Technical Director. Details of submitted Glasslam information that was ignored or killed as well as Edgetech IG submittals that run almost daily are available upon request.

Conclusion

Glasslam N.G.I., along with the U.S. and Canadian insulating glass markets have been damaged by the conspiratory and collusive actions of Edgetech IG with members of the IGCC/IGMA/IGMAC as well as raw material suppliers, trade magazines and industry groups. Illegal efforts to keep Glasslam out of a competitive playing field are easily proven and should be dealt with by a full investigation. The certifying organizations in question have written anti-trust policies that they need only read and follow to ensure a market with vigorous competition. One member (Edgetech IG) has corrupted the process and damaged an industry all the way from a supplier level to the consumers purchasing finished units containing insulating glass. The damages to our company because of these illegal activities have escalated into millions of dollars. We seek justice for the insulating glass industry and for our company. Our records and actions are an open book, and we offer any requested help to remedy the situation that now exists because of the despicable actions of a few.

Sincerely,

Stephen Howes
CEO
Nebula Glass International