

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FILED

AUG 23 2007

NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

U.S. SECURITIES AND EXCHANGE)
COMMISSION,)
100 F. Street, NE)
Washington, D.C. 20549-6030)

Plaintiff,)

v.)

TEXTRON INC.)
40 Westminster Street)
Providence, RI 02903)

Defendant.)

Case: 1:07-cv-01505
Assigned To : Kollar-Kotelly, Colleen
Assign. Date : 8/23/2007
Description: GENERAL CIVIL

COMPLAINT

Plaintiff, U.S. Securities and Exchange Commission (the "Commission"), alleges that:

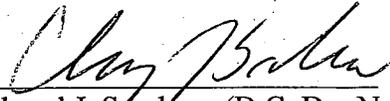
SUMMARY

1. From approximately 2001 through 2003, Textron Inc. ("Textron") violated the books and records and internal controls provisions of the Foreign Corrupt Practices Act (the "FCPA") when two of its French subsidiaries authorized and made approximately \$650,539 in kickback payments in connection with its sale of humanitarian goods to Iraq under the United Nations ("U.N.") Oil for Food Program. Textron's French subsidiaries authorized and paid kickbacks to Iraq in the form of "after-sales service fees" on sales of its products to Iraq. Textron knew or was reckless in not knowing that kickbacks were paid in connection with those transactions. Textron knew

- B. Ordering Textron to disgorge ill-gotten gains, with prejudgment interest, wrongfully obtained as a result of its illegal conduct;
- C. Ordering Textron to pay civil penalties pursuant to Section 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)]; and
- D. Granting such further relief as the Court may deem just and appropriate.

Dated: August 23, 2007

Respectfully submitted,



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