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2016 DEC - 7 A 9:20
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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

EMC

18 UNITED STATES OF AMERICA,
19 Plaintiff,

CR 16 501
Case No. 16 CR _____

20 v.

INFORMATION

21 WALTER SCOTT CAMERON,
22 Defendant.

15 U.S.C. § 1 — Price Fixing

23 The United States of America, acting through its attorneys, charges:

24 I.

DESCRIPTION OF THE OFFENSE

25 1. WALTER SCOTT CAMERON (“defendant”) is hereby made defendant on the
26 charge contained in this Information.

27 2. Beginning as early as 2011 and continuing until in or about 2013, the exact
28 dates being unknown to the United States, in the Northern District of California and
elsewhere, the defendant and his coconspirators knowingly entered into and engaged in a

1 combination and conspiracy to fix, raise, and maintain the prices of packaged seafood sold in
2 the United States. The combination and conspiracy engaged in by the defendant and
3 coconspirators was an unreasonable restraint of interstate commerce in violation of Section 1
4 of the Sherman Antitrust Act (15 U.S.C. § 1).

5 3. The charged combination and conspiracy consisted of a continuing agreement,
6 understanding, and concert of action among the defendant and coconspirators, the substantial
7 terms of which were to fix, raise, and maintain prices of packaged seafood.

8 4. Packaged seafood includes shelf-stable tuna fish.

9 II.

10 DEFENDANT AND COCONSPIRATORS

11 5. During the time period covered by this Information, the defendant was a
12 resident of New Jersey and a citizen of the United States. From at least as early as June 2007
13 until at least as late as October 2016, the defendant was employed by Company A as a Senior
14 Vice President of Sales.

15 6. Company A, an unindicted coconspirator company, is an entity organized and
16 existing under the laws of Delaware and with its principal place of business in San Diego,
17 California.

18 7. During the period covered by this Information, Company A was a producer of
19 packaged seafood and was engaged in the sale of packaged seafood in the United States and
20 elsewhere.

21 8. Various business organizations and individuals, not made defendants in this
22 Information, participated as coconspirators in the offense charged in this Information and
23 performed acts and made statements in furtherance of it.

24 9. Whenever in this Information reference is made to any act, deed, or transaction
25 of any business organization, the allegation means that the business organization engaged in
26 the act, deed, or transaction by or through its officers, directors, employees, agents, or other

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1 representatives while they were actively engaged in the management, direction, control, or
2 transaction of its business or affairs.

3 III.

4 MEANS AND METHODS OF THE CONSPIRACY

5 10. For the purpose of forming and carrying out the charged combination and
6 conspiracy, the defendant and his coconspirators did those things that they combined and
7 conspired to do, including, among other things:

8 a. engaged in conversations and discussions and attended meetings with
9 representatives of other major packaged-seafood-producing firms;

10 b. agreed and reached mutual understandings during these conversations,
11 discussions, and meetings, to fix, raise, and maintain the prices of packaged seafood sold in the
12 United States; and

13 c. negotiated prices and issued price announcements for packaged seafood in
14 accordance with the agreements and mutual understandings reached.

15 IV.

16 TRADE AND COMMERCE

17 11. During the period covered by this Information, packaged seafood sold by the
18 defendant and one or more of the coconspirator firms, and equipment and supplies necessary
19 to the production and distribution of packaged seafood, as well as payments for packaged
20 seafood, traveled in interstate commerce.

21 12. During the period covered by this Information, the business activities of
22 Company A and its coconspirators in connection with the sale of packaged seafood were
23 within the flow of, and substantially affected, interstate commerce.

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INFORMATION

1 ALL IN VIOLATION OF TITLE 15, UNITED STATES CODE, SECTION 1.

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