

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	Criminal No.: 97-111
v.)	
)	15 U.S.C. § 1
PITTSBURGH RIGGING COMPANY, INC.)	
)	Filed: [7/8/97]
Defendant.)	
		Judge: Standish

INFORMATION

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

I

DEFENDANT AND CO-CONSPIRATORS

1. Pittsburgh Rigging Company, Inc., (Pittsburgh Rigging),
a corporation organized and existing under the laws of the
Commonwealth of Pennsylvania, with offices in Clinton,
Pennsylvania, is hereby made a defendant on the charge stated
below.

2. Whenever in this Information reference is made to any
act, deed or transaction of a corporation, the allegation means
that the corporation engaged in the act, deed or transaction by
or through its officers, directors, agents, employees or other
representatives while they were actively engaged in the
management, direction, control or transaction of its business or
affairs.

3. Various individuals and companies not made defendants
herein participated as co-conspirators in the offense charged

herein and performed acts and made statements in furtherance thereof.

II

BACKGROUND

4. Bridge inspection and structural rigging services consist of providing engineering companies, contracted by federal, state and/or local governmental agencies to inspect the structural integrity of a bridge or group of bridges, with equipment and manpower in order to properly and safely conduct such inspections. A rigging subcontractor typically provides services that may include traffic control, safety boats, and boom and bucket trucks.

III

OFFENSE CHARGED

5. Beginning at least as early as September 1993 and continuing at least until September 1995, the exact dates being unknown to the United States, the defendant and co-conspirators entered into and participated in a combination and conspiracy to suppress and eliminate competition in unreasonable restraint of interstate trade and commerce.

6. The charged conspiracy consisted of an agreement, understanding and concert of action among the defendant and co-conspirators, the substantial terms of which were to allocate certain customers for bridge inspection and structural rigging services and to rig bids submitted to these customers.

7. For the purpose of forming and carrying out the charged conspiracy, the defendant and co-conspirators did those things they combined and conspired to do, including, among other things:

- (a) agreeing to allocate certain customers for bridge inspection and structural rigging services;
- (b) discussing among themselves the submission of prospective bids on certain bridge inspection and structural rigging contracts;
- (c) agreeing among themselves which company would be the low bidder on the aforementioned contracts; and
- (d) submitting collusive and noncompetitive bids on the aforementioned contracts.

IV

TRADE AND COMMERCE

8. During the period covered by this Information, the defendant and co-conspirators submitted bids, contracted for, provided and performed bridge inspection and rigging services both inside and outside the Commonwealth of Pennsylvania. Additionally, materials, labor and equipment were transported across state lines for use in performing some of the aforementioned bridge inspection and structural rigging contracts.

9. The business activities of the defendant and co-conspirators that are the subject of this Information were within the flow of, and substantially affected, interstate trade and commerce.

JURISDICTION AND VENUE

10. The combination and conspiracy charged in this Information was formed and carried out, in part, within the Western District of Pennsylvania, within the five years preceding the filing of this Information.

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

Dated:

_____/s/_____
JOEL I. KLEIN
Acting Assistant Attorney General

_____/s/_____
LAURA HEISER

_____/s/_____
GARY R. SPRATLING
Deputy Assistant Attorney General

_____/s/_____
PEDRO DE LA TORRE

_____/s/_____
ROBERT E. CONNOLLY
Chief, Middle Atlantic Office

Attorneys, Antitrust Division
U.S. Department of Justice
Middle Atlantic Office
The Curtis Center, Suite 650W
170 S. Independence Mall West
Philadelphia, PA 19106-2424
Tel.: (215) 597-7401

_____/s/_____
FREDERICK W. THIEMAN
United States Attorney
Western District of Pennsylvania