

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE-OPELOUSAS DIVISION

UNITED STATES OF AMERICA	)	
	)	Criminal No.
V.	)	
	)	Filed: [5/4/95]
NATIONAL TURTLE FARMERS & SHIPPERS ASSOCIATION, INC.,	)	
	)	Violation:
Defendant.	)	15 U.S.C. § 1

INFORMATION

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

I.

DESCRIPTION OF THE OFFENSE

1. National Turtle Farmers & Shippers Association, Inc. is hereby made a defendant on the charge stated below.

2. Beginning as early as 1989 and continuing thereafter until at least 1994, the exact dates being unknown to the United States, the defendant and others entered into and participated in a combination and conspiracy to suppress and eliminate competition by fixing, maintaining, and stabilizing the price of turtles in unreasonable restraint of interstate and foreign trade and commerce, in violation of Section 1 of the Sherman Act (15 U.S.C. § 1).

3. The term "turtles" as used in this information describes turtles with a carapace length of less than four inches, commonly known as red eared sliders.

4. The charged combination and conspiracy consisted of a continuing agreement, understanding and concert of action among the defendant and co-conspirators, the substantial terms of which were to fix, maintain, and stabilize the price of turtles by, among other things:

- (a) agreeing to establish the price for turtles;  
and
- (b) agreeing to adhere to the established price.

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

- (a) periodically, meeting and discussing the price of turtles;
- (b) agreeing, in the course of those discussions, on the price at which they would sell turtles;
- (c) agreeing, in the course of those discussions, that the agreed upon price would go into effect on a certain date;

- (d) agreeing to adhere to the established price; and
- (e) monitoring and enforcing compliance with the agreements to adhere to the established price.

## II.

### DEFENDANT AND CO-CONSPIRATORS

6. National Turtle Farmers & Shippers Association, Inc. is a corporation organized and existing under the laws of the State of Louisiana. Members of the National Turtle Farmers and Shippers Association, Inc. raise turtles and their eggs for sale to domestic distributors and foreign customers.

7. Various individuals and corporations, not made defendants herein, participated as co-conspirators in the offense charged and performed acts and made statements in furtherance thereof.

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

## III.

### TRADE AND COMMERCE

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 and foreign trade and commerce.

IV.

JURISDICTION AND VENUE

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

Dated:

\_\_\_\_\_/s/\_\_\_\_\_  
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Assistant Attorney General  
Antitrust Division

\_\_\_\_\_/s/\_\_\_\_\_  
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