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UNITED STATES DISTRICT COURT

12

DISTRICT OF OREGON

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14

UNITED STATES OF AMERICA)

No. CR-00-187-BR

15

v.)

VIOLATION:

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BEST TREE SERVICE, INC.,)

18 U.S.C. § 371

CONSPIRACY TO DEFRAUD

17

Defendant.)

FILED: APRIL 10, 2000

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INFORMATION

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The United States of America, acting through its attorneys,

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charges:

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I.

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DESCRIPTION OF
DEFENDANT AND CO-CONSPIRATORS

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1. BEST TREE SERVICE, INC. (BEST) is made a defendant on the charge

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stated below.

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1 and the co-conspirator were affiliated and were allocating and submitting non-
2 competitive bids to the BPA for brush clearing projects.

3 III.

4 OVERT ACTS IN FURTHERANCE OF CONSPIRACY

5 6. In furtherance of the conspiracy described in this Information, and in order
6 to effect the objects thereof, BEST and co-conspirators committed overt acts in the
7 District of Oregon and elsewhere, including but not limited to the following:

- 8 (a) not revealing to the BPA that between March 1996 and August
9 1997 Best had a contractual relationship with a co-conspirator
10 company that limited competition between BEST and that co-
11 conspirator in acquiring brush clearing work from the BPA;
12 (b) not revealing to the BPA that in August 1997 the owners of the co-
13 conspirator company obtained decision-making control of BEST; and
14 (c) meeting and agreeing with representatives of the co-conspirator
15 company to allocate and suppress competition on bids for BPA brush
16 clearing projects in eastern Washington and Oregon.
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1 ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 371

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4 "/s/"
Joel I. Klein
Assistant Attorney General

 "/s/"
Christopher S Crook
Chief, San Francisco Field Office

6
7 "/s/"
James M. Griffin
8 Deputy Assistant Attorney General

 "/s/"
Richard B. Cohen
Trial Attorney

9
10 "/s/"
11 Scott D. Hammond
Director of Criminal Enforcement

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