

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 12- _____
v.	:	DATE FILED: _____
D.A. LANDIS TRUCKING, INC.	:	VIOLATIONS:
DEAN A. LANDIS	:	18 U.S.C. § 371 (Conspiracy -1 count)
	:	18 U.S.C. § 1001 (False statements - 10 counts)
	:	

INFORMATION

COUNT ONE

(Conspiracy)

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

Background

1. Defendant D.A. LANDIS TRUCKING, INC., a corporation based in Lancaster, Pennsylvania, was a federally registered motor carrier that operated a fleet of tractor trailers which transported commercial freight and other products throughout the United States. It employed approximately 70 drivers with annual revenues of approximately \$6,000,000. D.A. LANDIS TRUCKING COMPANY hauled milk from approximately 700 individual dairy farms in Southeastern Pennsylvania to large dairy processors throughout the region.

2. Defendant DEAN A. LANDIS was the owner and president of defendant D.A. LANDIS TRUCKING, INC. who managed and supervised the day-to-day operations of the company.

3. The United States Department of Transportation (“USDOT”), Federal Motor Carrier Safety Administration (“FMCSA”) was the regulatory agency charged by Congress with the nationwide regulation of the trucking or motor carrier industry. The Secretary of USDOT (the “Secretary”) promulgated numerous regulations relating to record keeping, safe operation of motor carriers, and qualification of drivers. The regulations included both mandatory record keeping requirements and operational requirements.

4. Among the regulations promulgated by the Secretary were requirements that motor carriers keep records relating to equipment safety, driver qualifications and driver over-the-road activities, as well as licensing, record keeping, and maintenance standards. The FMCSA had authority to review these records kept by motor carriers in order to determine whether drivers employed by the motor carrier are qualified to safely operate commercial motor vehicles. FMCSA, on occasion, conducted inspections of motor carriers without notice, as well as the more frequent occurrence of an inspection with prior notice.

5. Pursuant to 49 C.F.R. § 395.8, commercial motor vehicle drivers were required to prepare and keep accurate records of duty status, commonly known as daily logs, in their own handwriting, listing a wide variety of information, including when the driver was "driving," "off duty," in the "sleeper berth," "on-duty/not driving," the location and time of each change of duty status, total miles driven each day, tractor and trailer number, name of carrier, 24-hour starting time, main office address, name of co-driver, total hours, and shipping document numbers relating to daily activity. Drivers were required to sign the logs to certify that all entries were true and correct.

6. As defined in 49 C.F.R. § 395.2: "Driving" meant all time spent at the driving controls of a commercial motor vehicle in operation. "On duty" meant all time from the time a driver began work or was required to be in readiness to work until the time he was relieved from work and all responsibility for performing work. "Sleeper berth" time encompassed rest time spent in a tractor's berth that met the standards of § 393.76. "Off-duty" time status was in effect when not in any of the above status forms and the driver was not in performance of any employment duties.

7. Pursuant to 49 C.F.R. § 395.8(a), (e) and (k), motor carriers were required to ensure that their drivers accurately prepared such logs, and collected and retained such logs as part of the motor carriers' business records, along with all supporting documents such as toll tickets, shipping documents, trip reports, payroll records, fuel receipts, and dispatch records, among other records, for a period of six months. These and other records were required to be maintained and available for USDOT inspection.

8. To promote commercial motor vehicle safety, the Secretary promulgated regulations limiting the hours of service of drivers. There were at least three major rules described in 49 C.F.R. § 395.3 that governed how long a driver could operate a commercial motor vehicle. The "10-hour" rule provided that once a driver accumulated 10 hours of driving time, the driver could not drive again until the driver had 8 consecutive hours "off-duty." The "15-hour" rule provided that once a driver had worked for 15 hours, the driver could not drive until the driver accumulated 8 consecutive hours off-duty. The "70-hour" rule provided that if a driver accumulated 70 hours "on-duty" in any consecutive 8-day period, the driver could not drive a commercial motor vehicle until his 8-day "on-duty" hours fell below 70 hours again.

FMCSA relied on these regulated logbooks and records to accurately assess driver and motor carrier compliance with safety requirements.

9. Pursuant to 49 C.F.R. § 391.41, commercial motor vehicle drivers were required to be physically qualified to operate a commercial motor vehicle. This required that the driver undergo a medical examination by a licensed medical examiner and to carry on his person the original or photographic copy of the medical examiner's certificate that he was physically qualified to drive a commercial motor vehicle. Drivers were required to have a new physical every two years. 49 C.F.R. § 391.45

10. Pursuant to 49 C.F.R. § 391.51, each motor carrier was required to maintain a driver's qualification file for each driver it employed. The driver's qualification file for each driver was required to include, among other documents, the driver's application, the certificate of the driver's road test or a copy of the license or certificate which the motor carrier accepted as equivalent to the driver's road test, and the medical examiner's certificate of the driver's physical qualification to operate a commercial motor vehicle.

11. FMCSA safety specialists were assigned to complete routine, as well as directed, inspections of businesses that operated as motor carriers within the United States. Routine inspections often required follow-up inspections to ensure compliance. Other times, reviews were ordered by FMCSA when complaints were received about the carrier from the public or employees, or when statistical data collected by FMCSA indicated problems such as a high number of accidents or "out-of service" incidents. This statistical information was known as a "carrier profile" and was available through the Motor Carrier Management Information System and Safety and Fitness Electronic Records System (SAFER). The FMCSA website linked users

to the SAFER website, <http://safer.fmcsa.dot.gov/CompanySnapshot.aspx>, which allowed the general public to view information, such as carrier accident driver, vehicle, and history information.

The Conspiracy

12. From in or about 2007 or earlier through in or about November 2009, at Lancaster, in the Eastern District of Pennsylvania and elsewhere, defendants

**D.A. LANDIS TRUCKING, INC.
and
DEAN A. LANDIS**

conspired and agreed, together and with others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to willfully falsify, conceal, and cover up, by trick, scheme, or device a material fact, in a matter within the jurisdiction of a department or agency of the United States, namely the Federal Motor Carrier Safety Administration and the Department of Transportation, in violation of Title 18, United States Code, Section 1001.

Manner and Means

It was part of the conspiracy that:

13. Defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS, along with persons known and unknown to the United States Attorney, prepared and aided and abetted the preparation and maintenance of false and fraudulent drivers' daily logs, and concealed from the USDOT and the FMCSA that D.A. LANDIS TRUCKING, INC. truck drivers were routinely exceeding the maximum number of driving hours and "on-duty" hours without the required hours off-duty, and were otherwise driving in violation of federal law.

14. Defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS routinely disregarded federal highway safety regulations by allowing, encouraging, and causing commercial truck drivers employed by D.A. LANDIS TRUCKING, INC. to:

- a. Operate commercial trucks in violation of federal highway safety regulations;
- b. Exceed the limitations on the maximum allowable number of hours driving and on-duty;
- c. Prepare and maintain false and fraudulent driver's daily logbooks to conceal violations of regulations governing the maximum allowable number of daily driving hours;
- d. Document "Not 4 DOT", "NO LOG", "NO DOT," or other method to notify management officials to file those documents in the file cabinet with files marked, "NOT FOR DOT JANUARY," "NOT FOR DOT SEPTEMBER 2009," and other similarly marked files stored away from the driver's logbooks and other locations where company officials would obtain regulated materials when called upon by USDOT FMCSA inspectors;
- e. Complete false "Daily Trip Sheets" in which the drivers falsely entered on-duty and off-duty times and falsely certify to the truthfulness and accuracy of the logbook entries.

15. Defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS knowingly and willfully dispatched the company's commercial truck drivers on trips which

defendants knew required excessive hours of driving time and excessive hours of "on-duty" time, without allowing for the required hours of rest or "off-duty" time.

16. Defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS, along with persons known and unknown to the United States Attorney, knowingly concealed violations of federal motor carrier safety regulations from federal and state officials and agents who reviewed and inspected the drivers' daily logbooks.

Overt Acts

17. On or about November 3, 2008, a driver employed by defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS, identified for purposes of this information as "K.R.," falsely certified in his driver's logbook that he was off-duty during the period from midnight through 11:00 a.m. that day when, in truth and in fact, K.R. was working during that time period and driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC.

18. On or about November 26, 2008, a driver employed by defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS, identified for purposes of this information as "R.W.," falsely certified in his driver's logbook that he was off-duty during the period from 7:30 p.m. through midnight that day when, in truth and in fact, R.W. was working during that time period and driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC.

19. On or about December 21, 2008, a driver employed by defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS, identified for purposes of this information as "E.C.," falsely certified in his driver's logbook that he was in his sleeper berth and not driving during the period from 12:30 p.m. through 2:30 p.m. that day when, in truth and in fact, E.C. was

working during that time period and driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC.

20. On or about March 18, 2009, a driver employed by defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS, identified for purposes of this information as "B.D.M.," falsely certified in his driver's logbook that he was off-duty between the hours of 6:45 a.m. and 10:00 p.m. that day when, in truth and in fact, B.D.M. was driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC.

21. On or about April 7, 2009, a driver employed by defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS, identified for purposes of this information as "E.M.," falsely certified in his driver's logbook that he was off-duty during the entire 24 hour period from 12:01 a.m. through 11:59 p.m. that day when, in truth and in fact, E.M. was working that day and driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC.

22. On or about April 23, 2009, a driver employed by defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS, identified for purposes of this information as "R.B.," falsely certified in his driver's logbook that he was off-duty between the hours of 4:30 a.m. and 5:30 a.m. and 8:30 a.m. and 1:00 p.m. when, in truth and in fact, R.B. was driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC. during those time periods.

23. On or about May 11, 2009, a driver employed by defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS, identified for purposes of this information as "D.M.," falsely certified in his driver's logbook that he was in the sleeper berth of his truck between the hours of midnight and 9:30 a.m. that day when, in truth and in fact, D.M. was driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC. during that time period.

24. On or about June 28, 2009, a driver employed by defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS, identified for purposes of this information as "D.S.," falsely certified in his driver's logbook that he was off-duty during the entire 24 hour period from 12:01 a.m. through 11:59 p.m. that day when, in truth and in fact, D.S. was driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC during that time period.

25. On or about July 22, 2009, a driver employed by defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS, identified for purposes of this information as "J.F.," falsely certified in his driver's logbook that he was off-duty during the entire 24 hour period from 12:01 a.m. through 11:59 p.m. that day when, in truth and in fact, J.F. was working during that time period and driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC.

26. On or about November 16, 2009, a driver employed by defendants D.A. LANDIS TRUCKING, INC. and DEAN A. LANDIS, identified for purposes of this information as "J.K.," falsely certified in his driver's logbook that he was off-duty during 11 hours of the 24 hour period from 12:01 a.m. through 11:59 p.m. that day when, in truth and in fact, J.K. was on-duty during that entire 24-hour time period on behalf of defendant D.A. LANDIS TRUCKING, INC.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(Making a False Statement)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 and 13 through 16 of Count One are incorporated here by reference.

2. On or about November 3, 2008, in the Eastern District of Pennsylvania and elsewhere, the defendant,

D.A. LANDIS TRUCKING, INC.

knowingly and willfully falsified, concealed, and covered up, by trick, scheme, or device a material fact, in a matter within the jurisdiction of a department or agency of the United States, namely the Federal Motor Carrier Safety Administration and the Department of Transportation, in that defendant D.A. LANDIS TRUCKING, INC. knowingly aided, abetted, commanded, induced and procured the preparation and maintenance for inspection by the Federal Motor Carrier Safety Administration of a false and fictitious driver's daily log of "K.R.," a commercial truck driver employed by the defendant company, which was known to be false, fictitious and fraudulent in that K.R. falsely certified in his driver's logbook that he was off-duty during the period from midnight through 11:00 a.m. that day when, in truth and in fact, K.R. was working during that time period and driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC.

All in violation of Title 18, United States Code, Section 1001 and 2.

COUNT THREE

(Making a False Statement)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 and 13 through 16 of Count One are incorporated here by reference.

2. On or about November 26, 2008, in the Eastern District of Pennsylvania and elsewhere, the defendant,

D.A. LANDIS TRUCKING, INC.

knowingly and willfully falsified, concealed, and covered up, by trick, scheme, or device a material fact, in a matter within the jurisdiction of a department or agency of the United States, namely the Federal Motor Carrier Safety Administration and the Department of Transportation, in that defendant D.A. LANDIS TRUCKING, INC. knowingly aided, abetted, commanded, induced and procured the preparation and maintenance for inspection by the Federal Motor Carrier Safety Administration of a false and fictitious driver's daily log of "R.W.," a commercial truck driver employed by the defendant company, which was known to be false, fictitious and fraudulent in that R.W. falsely certified in his driver's logbook that he was off-duty during the period from 7:30 p.m. through midnight that day when, in truth and in fact, R.W. was working during that time period and driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC.

All in violation of Title 18, United States Code, Section 1001 and 2.

COUNT FOUR

(Making a False Statement)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 and 13 through 16 of Count One are incorporated here by reference.

2. On or about December 21, 2008, in the Eastern District of Pennsylvania and elsewhere, the defendant,

D.A. LANDIS TRUCKING, INC.

knowingly and willfully falsified, concealed, and covered up, by trick, scheme, or device a material fact, in a matter within the jurisdiction of a department or agency of the United States, namely the Federal Motor Carrier Safety Administration and the Department of Transportation, in that defendant D.A. LANDIS TRUCKING, INC. knowingly aided, abetted, commanded, induced and procured the preparation and maintenance for inspection by the Federal Motor Carrier Safety Administration of a false and fictitious driver's daily log of "E.C.," a commercial truck driver employed by the defendant company, which was known to be false, fictitious and fraudulent in that E.C. falsely certified in his driver's logbook that he was in his sleeper berth and not driving during the period from 12:30 p.m. through 2:30 p.m. that day when, in truth and in fact, E.C. was working during that time period and driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC.

All in violation of Title 18, United States Code, Section 1001 and 2.

COUNT FIVE

(Making a False Statement)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 and 13 through 16 of Count One are incorporated here by reference.

2. On or about March 18, 2009, in the Eastern District of Pennsylvania and elsewhere, the defendant,

D.A. LANDIS TRUCKING, INC.

knowingly and willfully falsified, concealed, and covered up, by trick, scheme, or device a material fact, in a matter within the jurisdiction of a department or agency of the United States, namely the Federal Motor Carrier Safety Administration and the Department of Transportation, in that defendant D.A. LANDIS TRUCKING, INC. knowingly aided, abetted, commanded, induced and procured the preparation and maintenance for inspection by the Federal Motor Carrier Safety Administration of a false and fictitious driver's daily log of "B.D.M.," a commercial truck driver employed by the defendant company, which was known to be false, fictitious and fraudulent in that B.D.M. falsely certified in his driver's logbook that he was off-duty between the hours of 6:45 a.m. and 10:00 p.m. that day when, in truth and in fact, B.D.M. was driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC. during that time period.

All in violation of Title 18, United States Code, Section 1001 and 2.

COUNT SIX

(Making a False Statement)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 and 13 through 16 of Count One are incorporated here by reference.
2. On or about April 7, 2009, in the Eastern District of Pennsylvania and elsewhere, the defendant,

D.A. LANDIS TRUCKING, INC.

knowingly and willfully falsified, concealed, and covered up, by trick, scheme, or device a material fact, in a matter within the jurisdiction of a department or agency of the United States, namely the Federal Motor Carrier Safety Administration and the Department of Transportation, in that defendant D.A. LANDIS TRUCKING, INC. knowingly aided, abetted, commanded, induced and procured the preparation and maintenance for inspection by the Federal Motor Carrier Safety Administration of a false and fictitious driver's daily log of "E.M.," a commercial truck driver employed by the defendant company, which was known to be false, fictitious and fraudulent in that E.M. falsely certified in his driver's logbook that he was off-duty during the entire 24 hour period from 12:01 a.m. through 11:59 p.m. that day when, in truth and in fact, E.M. was working that day and driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC.

All in violation of Title 18, United States Code, Section 1001 and 2.

COUNT SEVEN

(Making a False Statement)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 and 13 through 16 of Count One are incorporated here by reference.
2. On or about April 23, 2009, in the Eastern District of Pennsylvania and elsewhere, the defendant,

D.A. LANDIS TRUCKING, INC.

knowingly and willfully falsified, concealed, and covered up, by trick, scheme, or device a material fact, in a matter within the jurisdiction of a department or agency of the United States, namely the Federal Motor Carrier Safety Administration and the Department of Transportation, in that defendant D.A. LANDIS TRUCKING, INC. knowingly aided, abetted, commanded, induced and procured the preparation and maintenance for inspection by the Federal Motor Carrier Safety Administration of a false and fictitious driver's daily log of "R.B.," a commercial truck driver employed by the defendant company, which was known to be false, fictitious and fraudulent in that R.B. falsely certified in his driver's logbook that he was off-duty between the hours of 4:30 a.m. and 5:30 a.m. and 8:30 a.m. and 1:00 p.m. when, in truth and in fact, R.B. was driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC. during those time periods.

All in violation of Title 18, United States Code, Section 1001 and 2.

COUNT EIGHT

(Making a False Statement)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 and 13 through 16 of Count One are incorporated here by reference.

2. On or about May 11, 2009, in the Eastern District of Pennsylvania and elsewhere, the defendant,

D.A. LANDIS TRUCKING, INC.

knowingly and willfully falsified, concealed, and covered up, by trick, scheme, or device a material fact, in a matter within the jurisdiction of a department or agency of the United States, namely the Federal Motor Carrier Safety Administration and the Department of Transportation, in that defendant D.A. LANDIS TRUCKING, INC. knowingly aided, abetted, commanded, induced and procured the preparation and maintenance for inspection by the Federal Motor Carrier Safety Administration of a false and fictitious driver's daily log of "D.M.," a commercial truck driver employed by the defendant company, which was known to be false, fictitious and fraudulent in that D.M. falsely certified in his driver's logbook that he was in the sleeper berth of his truck between the hours of midnight and 9:30 a.m. that day when, in truth and in fact, D.M. was driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC. during that time period.

All in violation of Title 18, United States Code, Section 1001 and 2.

COUNT NINE

(Making a False Statement)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 and 13 through 16 of Count One are incorporated here by reference.

2. On or about June 28, 2009, in the Eastern District of Pennsylvania and elsewhere, the defendant,

D.A. LANDIS TRUCKING, INC.

knowingly and willfully falsified, concealed, and covered up, by trick, scheme, or device a material fact, in a matter within the jurisdiction of a department or agency of the United States, namely the Federal Motor Carrier Safety Administration and the Department of Transportation, in that defendant D.A. LANDIS TRUCKING, INC. knowingly aided, abetted, commanded, induced and procured the preparation and maintenance for inspection by the Federal Motor Carrier Safety Administration of a false and fictitious driver's daily log of "D.S.," a commercial truck driver employed by the defendant company, which was known to be false, fictitious and fraudulent in that D.S. falsely certified in his driver's logbook that he was off-duty during the entire 24 hour period from 12:01 a.m. through 11:59 p.m. that day when, in truth and in fact, D.S. was driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC. during that time period.

All in violation of Title 18, United States Code, Section 1001 and 2.

COUNT TEN

(Making a False Statement)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 and 13 through 16 of Count One are incorporated here by reference.
2. On or about July 22, 2009, in the Eastern District of Pennsylvania and elsewhere, the defendant,

D.A. LANDIS TRUCKING, INC.

knowingly and willfully falsified, concealed, and covered up, by trick, scheme, or device a material fact, in a matter within the jurisdiction of a department or agency of the United States, namely the Federal Motor Carrier Safety Administration and the Department of Transportation, in that defendant D.A. LANDIS TRUCKING, INC. knowingly aided, abetted, commanded, induced and procured the preparation and maintenance for inspection by the Federal Motor Carrier Safety Administration of a false and fictitious driver's daily log of "J.F.," a commercial truck driver employed by the defendant company, which was known to be false, fictitious and fraudulent in that J.F. falsely certified in his driver's logbook that he was off-duty during the entire 24 hour period from 12:01 a.m. through 11:59 p.m. that day when, in truth and in fact, J.F. was working during that time period and driving a truck on behalf of defendant D.A. LANDIS TRUCKING, INC.

All in violation of Title 18, United States Code, Section 1001 and 2.

COUNT ELEVEN

(Making a False Statement)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 11 and 13 through 16 of Count One are incorporated here by reference.
2. On or about November 16, 2009, in the Eastern District of Pennsylvania and elsewhere, the defendant,

D.A. LANDIS TRUCKING, INC.

knowingly and willfully falsified, concealed, and covered up, by trick, scheme, or device a material fact, in a matter within the jurisdiction of a department or agency of the United States, namely the Federal Motor Carrier Safety Administration and the Department of Transportation, in that defendant D.A. LANDIS TRUCKING, INC. knowingly aided, abetted, commanded, induced and procured the preparation and maintenance for inspection by the Federal Motor Carrier Safety Administration of a false and fictitious driver's daily log of "J.F.," a commercial truck driver employed by the defendant company, which was known to be false, fictitious and fraudulent in that J.F.," falsely certified in his driver's logbook that he was off-duty during 11 hours of the 24 hour period from 12:01 a.m. through 11:59 p.m. that day when, in truth and in fact, J.F. was on-duty during that entire 24-hour time period on behalf of defendant D.A. LANDIS TRUCKING, INC.

All in violation of Title 18, United States Code, Section 1001 and 2.


ZANE DAVID MEMEGER
United States Attorney