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U.S. DISTRICT COURT
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WILLIAM W. BLEVINS
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

BILL OF INFORMATION FOR CONSPIRACY TO RESTRAIN TRADE

UNITED STATES OF AMERICA

*

CRIMINAL NO.

18 - 214

v.

*

SECTION:

SECT. 1 MAG. 2

ROBERTO DIP and
JASON HANDAL

*

VIOLATION: 15 U.S.C. §1

*

* * *

The United States charges that:

COUNT 1 - Sherman Act Conspiracy

A. AT ALL TIMES HEREIN:

1. Freight forwarders arranged for and managed the shipment of goods from one location to another. Freight forwarders provided freight forwarding services by receiving, packaging, and otherwise preparing cargo freight destined for ocean shipment to and from the United States; by arranging transportation of that cargo freight in conjunction with its ocean shipment to and from the United States; and by preparing appropriate documentation to accompany an ocean shipment to and from the United States. To provide these services, freight forwarders generally entered into contracts or other arrangements with ocean transportation

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providers to transport the goods, and the forwarders themselves provided domestic transportation, packaging, handling, and other services associated with the transportation of goods, both domestically and elsewhere.

The Defendants and Co-Conspirators

2. Company A, a company organized and existing under the laws of the United States with its principal place of business in Kenner, Louisiana, provided freight forwarding services to customers seeking to ship cargo from the United States to Honduras and elsewhere.

3. **ROBERTO DIP ("DIP")**, a citizen of Honduras, was the owner and president of Company A.

4. **JASON HANDAL ("HANDAL")**, a citizen of the United States, was employed by Company A as a manager.

5. Various business organizations and individuals, not made defendants herein, participated as co-conspirators in the offense charged in this Information and performed acts and made statements in furtherance of it in the United States and elsewhere. These co-conspirators provided freight forwarding services to customers seeking to ship cargo from the United States to Honduras and elsewhere.

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

B. SHERMAN ACT CONSPIRACY:

7. From at least as early as September 2010, and continuing until at least March 2015, the exact dates being unknown to the United States, in the Eastern District of Louisiana and elsewhere, **DIP** and **HANDAL** ("collectively referred to as "**THE DEFENDANTS**") and their co-conspirators knowingly joined and participated in a conspiracy to suppress and eliminate competition by fixing prices for freight forwarding services provided in the United States and elsewhere.

8. The combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among **THE DEFENDANTS** and their co-conspirators, the substantial terms of which were to increase, fix, stabilize, and maintain prices charged to customers for freight forwarding services provided in the United States and elsewhere.

9. The freight forwarding services provided by **THE DEFENDANTS**, and the cargo transported by **THE DEFENDANTS** and their co-conspirators in interstate commerce to numerous ports in the United States, were affected by the conspiracy described herein.

C. MANNER AND MEANS OF THE CONSPIRACY:

10. For purposes of forming and carrying out the combination and conspiracy, **THE DEFENDANTS** and/or their co-conspirators did those things that they combined and conspired to do, in the United States and elsewhere, including, among other things:

a. participated in meetings, conversations, and communications with each other in various locations, including in the United States, to discuss prices to be charged for freight forwarding services;

b. agreed during various meetings, conversations, and communications to increase, fix, stabilize, and maintain prices for freight forwarding services;

- c. discussed and exchanged pricing information for freight forwarding services for the purpose of carrying out the agreement;
- d. raised and maintained prices for freight forwarding services in accordance with the agreement reached;
- e. received payments for freight forwarding services sold at collusive, non-competitive prices; and
- f. provided freight forwarding services at collusive and non-competitive prices.

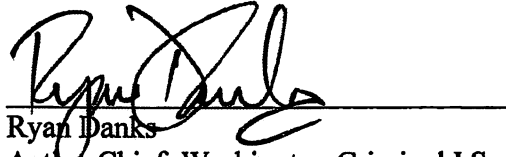
D. TRADE AND COMMERCE:

11. During the time period covered by this Information, the business activities of **THE DEFENDANTS** and their co-conspirators that are the subject of this Information were within the continuous and uninterrupted flow of, and substantially affected, interstate trade and commerce. For example, **THE DEFENDANTS** and their co-conspirators solicited and sold freight forwarding services to customers located in various states in the United States. Cargo transported by **THE DEFENDANTS** and their co-conspirators, as well as payments received for freight forwarding services by **THE DEFENDANTS** and their co-conspirators, traveled in interstate trade and commerce. The combination and conspiracy involved trade or commerce among the States in freight forwarding services.

All in violation of Title 15, United States Code, Section 1.



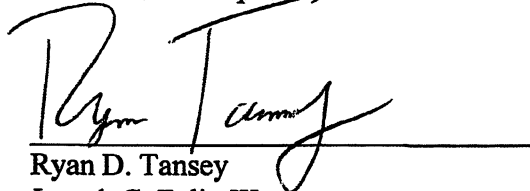
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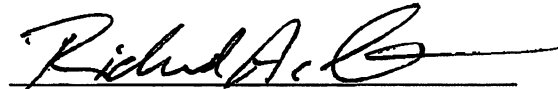
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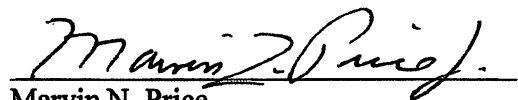
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Violation(s): 15 U.S.C. § 1

Filed _____, 20 18

_____, Clerk

By _____, Deputy



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