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U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 NIAL E. LYNCH (State Bar No. 157959)
2 MICHAEL L. SCOTT (State Bar No. 165452)
3 HEATHER S. TEWKSBURY (State Bar No. 222202)
4 ALEXANDRA J. SHEPARD (State Bar No. 205143)
5 DAVID J. WARD (State Bar. No. 239504)

6 Antitrust Division
7 U.S. Department of Justice
8 450 Golden Gate Avenue
9 Box 36046, Room 10-0101
10 San Francisco, CA 94102
11 Telephone: (415) 436-6660

E-filing

12 Attorneys for the United States

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA

CE 08 CR

0044

17 v.

INFORMATION

PJH

18 CHANG SUK CHUNG,

19 VIOLATION:
20 Title 15, United States Code,
21 Section 1 (Price Fixing)

22 Defendant.

San Francisco Venue

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

24 I.

25 DESCRIPTION OF THE OFFENSE

26 1. CHANG SUK CHUNG ("defendant") is made a defendant on the charge stated
27 below.

28 2. From on or about September 21, 2001, until on or about June 1, 2006, the
defendant's corporate employer, LG Display Co., Ltd. (formerly LG.Philips LCD Co., Ltd.)
("LG"), and coconspirators entered into and engaged in a combination and conspiracy in the
United States and elsewhere to suppress and eliminate competition by fixing the prices of thin-
film transistor liquid crystal display panels ("TFT-LCD"). The combination and conspiracy
engaged in by the defendant's corporate employer and coconspirators was an unreasonable

INFORMATION -- CHUNG -- 1

1 restraint of interstate and foreign trade and commerce in violation of Section 1 of the Sherman
2 Act (15 U.S.C. § 1). The defendant knowingly joined and participated in the charged conspiracy
3 from on or about September 21, 2001, until on or about June 1, 2006.

4 3. The charged combination and conspiracy consisted of a continuing agreement,
5 understanding, and concert of action among the defendant, his corporate employer, and
6 coconspirators, the substantial terms of which were to agree to fix the prices of TFT-LCD.

7 4. For the purpose of forming and carrying out the charged combination and
8 conspiracy, the defendant, his corporate employer, and coconspirators did those things that they
9 combined and conspired to do, including, among other things:

- 10 (a) participating in meetings, conversations, and communications in Taiwan,
11 Korea, and the United States to discuss the prices of TFT-LCD;
- 12 (b) agreeing, during those meetings, conversations, and communications, to
13 charge prices of TFT-LCD at certain predetermined levels;
- 14 (c) issuing price quotations in accordance with the agreements reached;
- 15 (d) exchanging information on sales of TFT-LCD, for the purpose of
16 monitoring and enforcing adherence to the agreed-upon prices; and
- 17 (e) authorizing, ordering, and consenting to the participation of subordinate
18 employees in the conspiracy.

19 II.

20 DEFENDANT AND COCONSPIRATORS

21 5. LG, the defendant's corporate employer, is a corporation organized and existing
22 under the laws of the Republic of Korea ("Korea"). During the period covered by the
23 Information, LG.Philips LCD Co., Ltd. a joint venture between LG Electronics and Phillips
24 Electronics, and a corporation organized and existing under the laws of Korea, engaged in the
25 business of producing and selling TFT-LCD to customers in the United States and elsewhere.
26 Effective March 4, 2008, LG Phillips LCD Co., Ltd., changed its name to LG Display Co., Ltd.

27 6. CHANG SUK CHUNG held various sales and marketing positions, including Vice
28 President of Monitor Sales for LG during the period covered by the Information.

7. Various corporations and individuals, not made defendants in this Information, participated as coconspirators in the offense charged in this Information and performed acts and made statements in furtherance of it.

8. Whenever in this Information reference is made to any act, deed, or transaction of any corporation, the allegation means that the corporation 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.

III.

TRADE AND COMMERCE

9. TFT-LCD are glass panels composed of an array of tiny pixels that are electronically manipulated in order to display images. TFT-LCD are manufactured in a broad range of sizes and specifications for use in televisions, notebook computers, desktop monitors, mobile devices, and other applications.

10. During the period covered by this Information, the defendant, his corporate employer, and coconspirators sold and distributed TFT-LCD in a continuous and uninterrupted flow of interstate and foreign trade and commerce to customers located in states or countries other than the states or countries in which the defendant, his corporate employer, and coconspirators produced TFT-LCD.

11. The business activities of the defendant, his corporate employer, and coconspirators that are the subject of this Information were within the flow of, and substantially affected, interstate and foreign trade and commerce.

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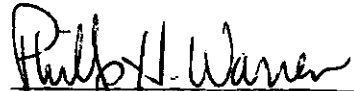
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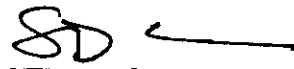
JURISDICTION AND VENUE

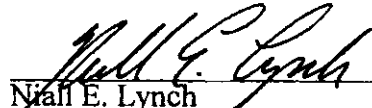
12. The combination and conspiracy charged in this Information was carried out, in part, in the Northern District of California, within the five years preceding the filing of this Information.


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



Deborah A. Garza
Acting Assistant Attorney General

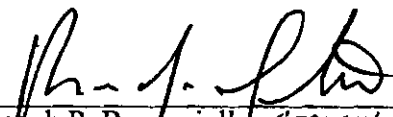

Phillip H. Warren
Chief, San Francisco Office


Scott D. Hammond
Deputy Assistant Attorney General


Niall E. Lynch
Assistant Chief, San Francisco Office


Marc Siegel
Director of Criminal Enforcement
United States Department of Justice
Antitrust Division


Michael L. Scott
Heather S. Tewksbury
Alexandra J. Shepard
David J. Ward
Attorneys
U.S. Department of Justice
Antitrust Division
450 Golden Gate Avenue
Box 36046, Room 10-0101
San Francisco, CA 94102
(415) 436-6660


Joseph P. Russoniello
United States Attorney
Northern District of California