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U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA

CE 09 CR

0044

12 v.

INFORMATION

PJH

14 CHANG SUK CHUNG,

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

15 Defendant.

San Francisco Venue

17  
18 The United States of America, acting through its attorneys, charges:

19 I.

20 DESCRIPTION OF THE OFFENSE

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

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

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.

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

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

8 III.

9 TRADE AND COMMERCE

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

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

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

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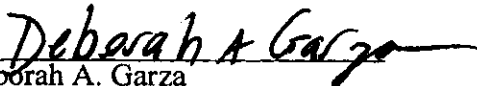
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IV.


JURISDICTION AND VENUE

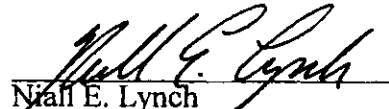
12. The combination and conspiracy charged in this Information was carried out, in part, in the Northern District of California, within the five years preceding the filing of this Information.


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

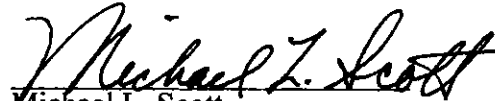
  
Deborah A. Garza  
Acting Assistant Attorney General

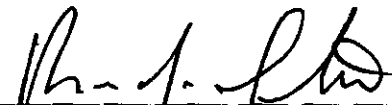
  
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