UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA :

v. : 05-CR-218

ANTHONY LAMPROPOULOS; and
POLO LINEN SERVICE, INC.;

Defendants. : Filed: 2/28/05
: Violation:
15 U.S.C. § 1
:

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INFORMATION

COUNT ONE--SHERMAN ACT CONSPIRACY
(15 U.S.C. § 1)

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

1. Anthony Lampropoulos and Polo Linen Service, Inc. are hereby made defendants on the charge stated below.

I. DESCRIPTION OF THE OFFENSE

2. Beginning in or around 1994 and continuing until at least September 2002, the exact dates being unknown to the United States, the defendants and co-conspirators engaged in a combination and conspiracy in unreasonable restraint of interstate trade and commerce in violation of Section 1 of the Sherman Act (15 U.S.C. § 1).

3. The aforesaid combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among the defendants and co-conspirators, the substantial terms of which were to allocate customers in the linen supply market in New York City; portions of Westchester, Suffolk, and Nassau Counties, New York; portions of northern New Jersey; and portions of Fairfield County, Connecticut ("New York metropolitan area").

4. For the purpose of forming and effectuating the aforesaid combination and conspiracy, the defendants and co-conspirators did those things which they combined and conspired to do, including, among other things:

(a) agreeing not to compete for each others' customers;

(b) meeting to discuss and affirm their agreement not to compete for each others' customers;

(c) notifying each other when such customers were contemplating switching linen suppliers; and

(d) submitting intentionally high non-competitive price quotes or refraining from submitting price quotes to such customers.

II. DEFENDANTS AND CO-CONSPIRATORS

5. During the period covered by this Information, Anthony Lampropoulos was President and owner of Polo Linen Service, Inc.

6. Polo Linen Service, Inc., is a New York corporation located in Lindenhurst, New York. During the period covered by this Information, defendant Polo Linen Service, Inc. was engaged in the business of providing linen supply services in the New York metropolitan area.

7. Whenever in this Count reference is made to any act, deed, or transaction of any corporation, such allegation shall be deemed to mean that the corporation engaged in such act, deed, or transaction by or through its officers, directors, agents, employees, or representatives while they were actively engaged in the management, direction, control, or transaction of its business or affairs.

8. Various persons and companies, not made defendants herein, participated as co-conspirators in the offense charged herein and performed acts and made statements in furtherance thereof.

III. INTERSTATE TRADE AND COMMERCE

9. Linen supply companies are primarily engaged in supplying to commercial establishments such laundered items as table linens, napkins, chef's uniforms, and aprons. Linen supply companies own the linen items, rent these items to customers, deliver clean items to the customer and pick up soiled items, usually on a weekly schedule. Major customers are restaurants, caterers, and cafeterias. During the period of

this conspiracy, the defendants and co-conspirators generated sales revenues from the supply of linen services in the New York metropolitan area in excess of $500 million.

10. The defendants' and co-conspirators' laundry operations are located in New York. During the period covered by this Information, defendants and co-conspirators provided linen supply services to customers located in the New York metropolitan area. In furnishing linen supply services to its customers, the defendants and co-conspirators transported a substantial portion of linen supplies across state lines.

11. The defendants and co-conspirators purchase substantial amounts of linen supplies to replace those that are worn out, lost or destroyed in the business operations. Most of the linen supplies are produced by manufacturers located in states other than New York.

12. During the period covered by this Information, the activities of the defendants and co-conspirators that are the subject of this Information were within the flow of, and substantially affected, interstate trade and commerce.

IV. JURISDICTION AND VENUE

13. The aforesaid combination and conspiracy was carried out, in part, within the Southern District of New York within the five years preceding the filing of this Information.

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

Dated:

/s/_____
R. HEWITT PATE
Assistant Attorney General

/s/_____
RALPH T. GIORDANO
Chief, New York Office

/s/_____
SCOTT D. HAMMOND
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