IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

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| UNITED STATES OF AMERICA | ) | FILED: 10/7/97 |
| | ) | |
| v. | ) | CRIMINAL NO.: CR-97-391-A |
| | ) | |
| PATRICIA A. REMELE, | ) | VIOLATION: 15 U.S.C. § 1 |
| | ) | (Bid Rigging) |
| Defendant. | ) | |
| | ) | JUDGE BRINKEMA |

INFORMATION

THE UNITED STATES CHARGES THAT:

1. PATRICIA A. REMELE is made a defendant herein. The defendant is a real estate speculator residing in McLean, Virginia.

2. From at least as early as May 1987 through at least June 1994, in the Eastern District of Virginia and elsewhere,

PATRICIA A. REMELE,

defendant herein, and others entered into and engaged in a combination and conspiracy to rig bids at certain public real estate auctions in the Eastern District of Virginia.

3. The charged combination and conspiracy consisted of a continuing agreement, understanding and concert of action among the defendant and co-conspirators, the substantial terms of which were:

(a) to suppress competition by agreeing to refrain from full competitive bidding against each other at certain public real estate auctions, and

(b) to conduct second, secret auctions at which the conspirators rebid the properties they won at the public auctions, and divided among themselves the difference between the public and secret auction prices.

The proceeds of the secret auctions were distributed as payoffs to the conspirators in return for suppressing competition at certain public real estate auctions.

4. For the purpose of forming and carrying out the charged combination and conspiracy, the defendant and co-conspirators did the following, among other things:

(a) designated, in various ways, a bidder to bid at the public auction for the group of conspirators;

(b) held secret auctions, open only to members of the conspiracy, to rebid the property won by the designated bidder at the public auction;

(c) awarded the property to the conspirator who submitted the highest bid at the secret auction, and

(d) distributed the proceeds of the secret auction as payoffs based on a predetermined formula agreed upon by the members of the conspiracy.

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

6. The business activities of the defendant and her co-conspirators that are the subject of this Information were within the flow of, and substantially affected, interstate trade and commerce. (A violation of Title 15, United States Code, Section 1.)

7. The aforesaid combination and conspiracy was formed and carried out, in part, within the Eastern District of Virginia within the five years preceding the filing of this Information.

HELEN F. FAHEY
UNITED STATES ATTORNEY

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