

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA)	Filed: July 16, 1999
)	
v.)	Criminal No.: 99-403
)	
LITTLETON EDWARDS WALKER,)	Violation: 15 U.S.C. §1
)	
)	
Defendant.)	
)	

INFORMATION

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

I

DESCRIPTION OF THE OFFENSE

1. LITTLETON EDWARDS WALKER is made a defendant on the charge stated below.
2. Beginning at least as early as September 1995 and continuing until in or about January 1997, the exact dates being unknown to the United States ("the relevant time period"), the defendant, acting on behalf of J. Ray McDermott, S.A. ("JRM"), and co-conspirators entered into and engaged in a combination and conspiracy to suppress and eliminate competition by rigging bids for the sale of marine construction services in the United States and elsewhere. The charged combination and conspiracy, engaged in by the defendant and co-conspirators in

unreasonable restraint of interstate and foreign trade and commerce, violated Section 1 of the Sherman Act (15 U.S.C. § 1).

3. The charged combination and conspiracy consisted of a continuing agreement, understanding and concert of action among the defendant and co-conspirators, the substantial term of which was to increase to customers in the United States and elsewhere the prices paid for marine construction services.

4. For the purpose of forming and carrying out the charged combination and conspiracy, the defendant and co-conspirators did those things that they combined and conspired to do, including, among other things:

(a) participating in meetings and conversations to discuss and agree upon the prices at which to bid for contracts to provide marine construction services in the United States Gulf of Mexico and elsewhere;

(b) discussing and agreeing upon which conspirator entity would obtain particular contracts or particular portions of contracts to provide marine construction services in the United States Gulf of Mexico and elsewhere;

(c) discussing and agreeing that various conspirator entities would restrict their marine construction activities to particular regions of the world;

(d) exchanging proposed bid prices for particular contracts to provide marine construction services in the United States Gulf of Mexico and elsewhere;

(e) submitting rigged bids for particular contracts to provide marine construction services in the United States Gulf of Mexico and elsewhere at the rigged prices;

(f) entering contracts to provide marine construction services in the United States Gulf of Mexico and elsewhere at the rigged prices;

(g) billing customers for providing marine construction services in the United States Gulf of Mexico and elsewhere at the rigged prices; and

(h) collecting payments for providing marine construction services in the United States Gulf of Mexico and elsewhere at the rigged prices.

II

DEFINITION

5. The term “marine construction services” encompasses the industries or services that engineer, fabricate, transport, install and remove (a) offshore fixed oil and gas production platforms, decks and similar structures and (b) subsea pipeline systems.

III

DEFENDANT AND CO-CONSPIRATORS

6. During the relevant time period, defendant was Senior Vice President of Business Development and Strategic Initiatives of JRM, a Panamanian company with its principal place of business in Houston, Texas. JRM is sixty (60) percent owned by McDermott International, Inc., a Panamanian company with its

principal place of business in New Orleans, Louisiana. During the relevant time period, defendant was responsible for overseeing JRM's joint venture relationships and reviewing certain bid proposals for marine construction services.

7. Various corporations (or other artificial entities) and individuals, not made defendants in this Information, participated as co-conspirators in the offense charged herein and performed acts and made statements in furtherance of the conspiracy.

IV

TRADE AND COMMERCE

8. During the period covered by this Information, the defendant and co-conspirators sold and provided marine construction services to customers in the United States and elsewhere. These services were in the flow of, and substantially affected, U.S. interstate and foreign trade and commerce.

9. The business activities of the defendant and co-conspirators that are the subject of this Information were within the flow of, and substantially affected, U.S. interstate and foreign trade and commerce.

JURISDICTION

10. The combination and conspiracy charged in this Information was carried out, in part, within the Southern District of Texas within the five years preceding the filing of this Information.

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

DATED:

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"/s/"
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