

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Criminal Action No.: 20-cr-330-RM

UNITED STATES OF AMERICA,

Plaintiff,

v.

PILGRIM'S PRIDE CORPORATION,

Defendant.

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**INFORMATION**  
15 U.S.C. § 1

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The United States charges:

At all times material to this Information:

DEFENDANT AND CO-CONSPIRATORS

1. PILGRIM'S PRIDE CORPORATION ("Defendant"), was a corporation organized and existing under the laws of Delaware with its headquarters in Greeley, Colorado. Defendant was engaged in the production and sale of broiler chicken products.

2. Various corporations and individuals, not made defendants in this Information, participated as co-conspirators to commit the offense charged in this Information and performed acts and made statements in furtherance of it.

3. Wherever this Information refers to any act of any corporation, the allegation means that the corporation engaged in the act by or through its officers,

directors, employees, agents, or other representatives while they were actively engaged in the management, direction, control, or transaction of that corporation's business.

#### DESCRIPTION OF THE OFFENSE

4. Beginning at least as early as 2012 and continuing through at least early 2019, the exact dates being unknown to the United States, in the State and District of Colorado and elsewhere, Defendant and its co-conspirators entered into and engaged in a continuing combination and conspiracy to suppress and eliminate competition by rigging bids and fixing prices and other price-related terms for broiler chicken products sold in the United States. The combination and conspiracy engaged in by Defendant and its co-conspirators was a *per se* unlawful, and thus unreasonable, restraint of interstate trade and commerce in violation of Section 1 of the Sherman Act, 15 U.S.C. § 1.

#### TRADE AND COMMERCE

5. During the period covered by this Information, Defendant and its co-conspirators shipped substantial quantities of broiler chicken products by truck in a continuous and uninterrupted flow of interstate trade and commerce to companies located in states outside the place of origin of the shipments. During the period covered by this Information, the business activities of Defendant and its co-conspirators in connection with the sale of broiler chicken products were within the flow of, and substantially affected, interstate trade and commerce.

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

DATED: 10/8/2020



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MAKAN DELRAHIM  
Assistant Attorney General




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BERNARD A. NIGRO JR.  
Principal Deputy Assistant Attorney  
General



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RICHARD A. POWERS  
Deputy Assistant Attorney General



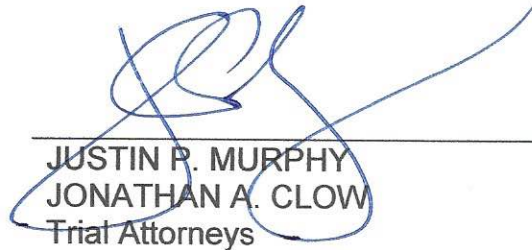
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MARVIN N. PRICE JR.  
Director of Criminal Enforcement



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JAMES J. FREDRICKS  
Chief, Washington Criminal II Section



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JUSTIN P. MURPHY  
JONATHAN A. CLOW  
Trial Attorneys

U.S. Department of Justice  
Antitrust Division

U.S. Department of Justice  
Antitrust Division