

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CENTRAL DIVISION

UNITED STATES OF AMERICA,)	No. 14-CR-3024
)	
Plaintiff,)	INFORMATION
)	
vs.)	Count 1
)	18 U.S.C. § 201(b)(1): Bribery of a
QUALITY EGG, LLC, (d/b/a Wright)	Public Official
County Egg and Environ), AUSTIN)	
DECOSTER (a/k/a Jack DeCoster), and)	Count 2
PETER DECOSTER,)	21 U.S.C. §§ 331(a) and 333(a)(2):
)	Introducing Misbranded Food Into
Defendants.)	Interstate Commerce with Intent to
)	Defraud or Mislead
)	
)	Count 3
)	21 U.S.C. §§ 331(a) and 333(a)(1):
)	Introducing Adulterated Food Into
)	Interstate Commerce
)	
)	Forfeiture Allegation

The United States Attorney charges:

Count 1
Bribery of a Public Official
(Quality Egg, LLC)

On at least two separate occasions in 2010, including on or about April 12, 2010, in the Northern District of Iowa, defendant QUALITY EGG, LLC did, directly and indirectly, corruptly give, offer, and promise a thing of value to a public official with intent to influence an official act, and to induce a public official to do an act and omit to do an act in violation of the public official's official duty. That is, defendant did corruptly offer, promise, and give money to a United States Department of Agriculture (USDA) Inspector at defendant's egg production facility

in Wright County, Iowa, with intent to influence the USDA Inspector to release for sale shell eggs that had been retained by the USDA for failing to meet the standards of the Egg Products Inspection Act, 21 U.S.C. § 1031 *et seq.*

This was in violation of Title 18, United States Code, Section 201(b)(1).

Count 2
Introducing Misbranded Food Into Interstate Commerce with Intent to Defraud or Mislead
(Quality Egg, LLC)

Beginning no later than January 1, 2006, and continuing until approximately August 12, 2010, in the Northern District of Iowa and elsewhere, defendant QUALITY EGG, LLC, with intent to defraud and mislead, did introduce and cause to be introduced into interstate commerce food, that is shell eggs, that were misbranded. The shell eggs were misbranded within the meaning of 21 U.S.C. § 343(a)(1) in that their labeling was false and misleading in any particular because it made the eggs appear to be not as old as they actually were.

This was in violation of Title 21, United States Code, Sections 331(a) and 333(a)(2).

Count 3
Introducing Adulterated Food Into Interstate Commerce
(All Defendants)

Between about the beginning of 2010 and in or about August 2010, in the Northern District of Iowa and elsewhere, defendants QUALITY EGG, LLC, AUSTIN DECOSTER and PETER DECOSTER did introduce and cause to be introduced into interstate commerce food, that is shell eggs, which were adulterated. The shell eggs were adulterated within the meaning of 21 U.S.C.

§ 342(a)(1) in that they contained a poisonous and deleterious substance, that is, *Salmonella Enteriditis*, that may have rendered them injurious to health. Between about the beginning of 2010 and in or about August 2010, AUSTIN DECOSTER and PETER DECOSTER were Responsible Corporate Officers of Quality Egg, LLC within the meaning of the Food, Drug and Cosmetic Act.

This was in violation of Title 21, United States Code, Sections 331(a) and 333(a)(1).

FORFEITURE ALLEGATION

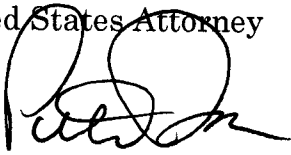
The allegations contained in Count 1 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C).

Upon conviction of the offense in violation of Title 18, United States Code, Section 201(b)(1) set forth in Count 1 of this Information, defendant QUALITY EGG, LLC shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), any property, real or personal, which constitutes or is derived from proceeds traceable to such violation, including but not limited to the amount of \$10,000, representing proceeds of the offense.

This is all pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

KEVIN W. TECHAU
United States Attorney

By:



PETER E. DEEGAN, JR.
Assistant United States Attorney

LISA K. HSIAO
CHRISTOPHER E. PARISI
Trial Attorneys
U.S. Department of Justice
Consumer Protection Branch