

**UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

GREATER NEW YORK LIVE POULTRY  
CHAMBER OF COMMERCE, *et al.*,  
Defendants.

In Equity No. 52-30

**DECLARATION OF LAWRENCE REICHER**

I, Lawrence Reicher, do hereby declare and state as follows:

1. I am an attorney admitted to practice in New York and in the Southern District of New York. Since February 2019, I have served as a Counsel to the Assistant Attorney General of the Antitrust Division of the Department of Justice.
2. This Declaration is being submitted in support of the United States of America's Motion to Terminate A Legacy Antitrust Judgment in the above-captioned matter.
3. The statements made in this Declaration are based on the knowledge acquired by me in the performance of my official duties and in conjunction with factual research conducted by other attorneys and staff in the Antitrust Division.
4. In early 2018, the Department of Justice Antitrust Division implemented a program to review and, when appropriate, seek termination of older antitrust judgments in which parties were subjected to some type of affirmative obligation or express prohibition that did not have an expiration date. As part of this process, the Division researched the corporate status of entities subject to these older, legacy antitrust judgments.

5. For the judgment in this case, I instructed the librarians of the Antitrust Division to research and confirm the corporate status of the three corporate defendants named in the decree -- The Greater New York Live Poultry Chamber of Commerce, Local 167 of the International Brotherhood of Teamsters, Chauffeurs, Stablemen & Helpers of America, Inc., and the Official Orthodox Poultry Slaughters of America, Inc. Based on the information provided to me by the librarians, I believe none of these organizations are still in business and none of them have a successor entity. This belief is based upon the following research by the librarians, which I have reviewed:

- a. A search of the New York Department of State Division of Corporations database. If the final judgment (as submitted to this Court) or other web search (see below) suggested incorporation information for a defendant in another state, the librarians also checked that state for corporate status.
- b. A search of the Encyclopedia of Associations and IRS Tax Exempt Organization Search, where such organizations or associations were subject to a judgment.
- c. A search of web-based resources for the existence (or succession) of the entity. In addition to general web-based searches, the search included research in one or more of the following resources:
  - i. Lexis and/or Westlaw (news, company, and/or litigation search);
  - ii. historical newspapers from Newsbank, ProQuest, and/or Newspapers.com; and
  - iii. historical company directories held by the Antitrust Division Library.

6. After their research, the librarians at the Antitrust Division conveyed to me and other attorneys working on this project that they found no records suggesting that either the Greater New York Live Poultry Chamber of Commerce or the Official Orthodox Poultry Slaughters of America, Inc. are still in business. Neither organization has a New York incorporation record, and neither organization is listed in the Encyclopedia of Associations or IRS Tax Exempt Organizations database. The Antitrust Division contacted the Teamsters Union regarding Local 167 of the International Brotherhood of Teamsters, Chauffeurs, Stablemen & Helpers of America, Inc. The Teamsters Union, through its general counsel, confirmed that Local 167 no longer exists.

7. Finally, there were 49 individual defendants named in this judgment. Given that all the individuals would have been working adults 88 years ago, it is almost certain all of the individual defendants have passed away. Moreover, given the age of the judgment and the passage of time, it would be highly unlikely for any of the individual defendants to still be actively engaged in the relevant activities from the judgment.

Having reviewed this Declaration, I declare, under penalty of perjury that the foregoing is true and correct.

Dated: February 10, 2020  
Washington, D.C.

  
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Lawrence Reichler  
Counsel to the Assistant Attorney General  
United States Department of Justice, Antitrust Division