

FILED  
U.S. DIST. COURT  
MIDDLE DIST. OF LA

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

2014 JUN -3 PM 4:29

BILL OF INFORMATION FOR CONSPIRACY TO  
COMMIT SECURITIES FRAUD AND FORFEITURE ALLEGATION

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. 14- 67- BAJ-RLB
	:	
<i>versus</i>	:	
	:	18 U.S.C. § 371
	:	18 U.S.C. § 981(a)(1)(C)
SCOTT DAVID ZERINGUE	:	28 U.S.C. § 2461(c)

THE UNITED STATES ATTORNEY CHARGES:

At the specified times and at all relevant times:

BACKGROUND

1. **SCOTT DAVID ZERINGUE**, the defendant herein, was the Vice President of Construction Operations for the Plant Services Division of The Shaw Group, Inc. ("Shaw").
2. J.R. was a friend and family member of **ZERINGUE**.
3. In July 2012, in the course of his duties as a Shaw officer, **ZERINGUE** received confidential information regarding an impending acquisition of Shaw by another company ("the inside information").

THE CONSPIRACY AND ITS OBJECTS

4. In July 2012, **ZERINGUE** and J.R. knowingly and intentionally did conspire with each other and with others, both known and unknown, to commit offenses against the United States, that is, securities fraud (insider trading) in violation of Title 15, United States Code, Sections 78j(b) and 78ff, and Title 17, Code of Federal Regulations, Sections 240.10b5 and 240.10b5-1.

Dippel  
USPO

**MANNER AND MEANS**

5. The objects of the conspiracy were accomplished in the following manner:
- a. In a series of phone conversations, **ZERINGUE** provided the inside information to J.R., with the understanding that J.R. would purchase and sell Shaw securities on the basis of such information.
  - b. Both **ZERINGUE** and J.R. used the inside information as the basis for trading in Shaw securities on the New York Stock Exchange and thereby made substantial profits.
  - c. **ZERINGUE**'s disclosure of the inside information to J.R. and his exploitation of the information for personal benefit were in breach of the duty of trust and confidence that he owed to Shaw and Shaw's shareholders.

**OVERT ACTS**

6. In furtherance of the conspiracy and to accomplish its objects, **ZERINGUE** and J.R. committed and caused to be committed the following overt acts, among others, in the Middle District of Louisiana and elsewhere:
- a. On or about July 11, 2012, J.R. purchased stock options in Shaw.
  - b. On or about July 12, 2012, J.R. transferred funds into an options trading account.
  - c. On or about July 13, 2012, **ZERINGUE** purchased 125 shares of stock in Shaw.
  - d. On or about July 16, 2012, J.R. purchased additional stock options in Shaw.

e. On or about July 24, 2012, J.R. purchased additional stock options in Shaw.

The above is a violation of Title 18, United States Code, Section 371.

**FORFEITURE ALLEGATION**

7. Upon conviction of the offense charged in this Bill of Information, the defendant, **SCOTT DAVID ZERINGUE**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, approximately THIRTY TWO THOUSAND SIX DOLLARS (\$32,006) in proceeds derived from this offense.

8. If any of the proceeds described above, as a result of any act or omission of the defendant:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

Date: 6-2-14

UNITED STATES OF AMERICA, by  
*for*   
J. WALTER GREEN  
UNITED STATES ATTORNEY

  
J. CHRISTOPHER DIPPEL, JR.  
ASSISTANT U.S. ATTORNEY

  
M. PATRICIA JONES  
ASSISTANT U.S. ATTORNEY

**Criminal Cover Sheet U.S. District Court**

**Place of Offense:**

Matter to be sealed: \_\_\_ No X Yes

City Baton Rouge

**Related Case Information:**

County/Parish East Baton Rouge

Superseding Indictment \_\_\_ Docket Number \_\_\_

Same Defendant \_\_\_ New Defendant X

Magistrate Case Number \_\_\_\_\_

Search Warrant Case No. \_\_\_\_\_

R 20/ R 40 from District of \_\_\_\_\_

Any Other Related Cases: \_\_\_\_\_

**Defendant Information:**

Defendant Name: Scott David Zeringue

Alias \_\_\_\_\_

Address: \_\_\_\_\_

Birthdate: \_\_\_\_\_ SS #: \_\_\_\_\_ Sex: \_\_\_\_\_ Race: \_\_\_\_\_ Nationality: \_\_\_\_\_

**U.S. Attorney Information:**

AUSA: J. Christopher Dippel, Jr. Bar #: 30480

Interpreter: X No \_\_\_ Yes **List language and/or dialect:** \_\_\_\_\_

**Location Status:**

Arrest Date \_\_\_\_\_  
\_\_\_ Already in Federal Custody as of \_\_\_\_\_  
\_\_\_ Already in State Custody \_\_\_\_\_  
\_\_\_ On Pretrial Release \_\_\_\_\_

**U.S.C. Citations:**

Total # of Counts: 1

<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>	<u>Petty/ Misdemeanor/ Felony</u>
<u>18 U.S.C. § 371</u>	<u>Conspiracy to Commit Securities Fraud</u>	<u>1</u>	<u>Felony</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

(May be continued on second sheet)

Date: 6-2-14 Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_