

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE CATTLE ANTITRUST LITIGATION

Civil No. 19-cv-1222 (JRT/HB)

This document relates to:

ALL CASES

**THIRD CONSOLIDATED
AMENDED CLASS ACTION
COMPLAINT**

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Plaintiffs Ranchers Cattlemen Action Legal Fund United Stockgrowers of America, Farmers Educational and Cooperative Union of America, Weinreis Brothers Partnership, Minatare Feedlot, Inc., Charles Weinreis, Eric Nelson, James Jensen d/b/a Lucky 7 Angus, Richard Chambers as trustee of the Richard C. Chambers Living Trust, Steven Graham, and Nathan Graham (“Plaintiffs”), on behalf of themselves and all other similarly situated persons and entities, bring claims against the following for their violations of law from at least January 1, 2015, through the present (the “Class Period”): Tyson Foods, Inc., Tyson Fresh Meats, Inc. (“Tyson Fresh”) (collectively, “Tyson”), JBS S.A., JBS USA Food Company, Swift Beef Company, JBS Packerland, Inc. (collectively, “JBS”), Cargill, Incorporated, Cargill Meat Solutions Corporation (collectively, “Cargill”), and National Beef Packing Company, LLC (“National Beef,” and all collectively, the “Packing Defendants”), and John Does 1-10 (who traded in cattle futures and options on the Chicago Mercantile Exchange (“CME”), which is owned by the CME Group Inc.) (the “John Doe Defendants”) (collectively with the Packing Defendants, the “Defendants”).¹ Based upon personal knowledge, information and belief, and investigation of counsel, Plaintiffs allege as follows:

I. INTRODUCTION

1. From at least January 1, 2015, through the present, Packing Defendants conspired to fix and suppress – and did, in fact, fix and suppress – the price of fed cattle in the United States. Leveraging their consistent control of the purchase of nearly 85% of fed

¹ Plaintiffs reserve the right to amend their complaint once the identities of any further alleged conspirators are established.

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