

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE-OPELOUSAS DIVISION

UNITED STATES OF AMERICA	)	
	)	Criminal No.
V.	)	
	)	Filed: [3/22/94]
SEAFOOD INCORPORATED OF	)	
HENDERSON, LOUISIANA,	)	
	)	Violation:
Defendant.	)	15 U.S.C. § 1

INFORMATION

The United States of America, acting through its attorneys, charges:

I.

DESCRIPTION OF THE OFFENSE

1. Seafood Incorporated of Henderson, Louisiana is hereby made a defendant on the charge stated below.
2. Beginning as early as 1980 and continuing thereafter until at least late 1993, the exact dates being unknown to the United States, the defendant and others entered into and participated in a combination and conspiracy to suppress and eliminate competition by fixing, maintaining, stabilizing and suppressing the prices paid for crawfish in unreasonable restraint of interstate trade and commerce, in violation of Section 1 of the Sherman Act (15 U.S.C. § 1).
3. The charged combination and conspiracy consisted of a continuing agreement, understanding and concert of action among the defendant and co-conspirators, the substantial terms of which

were to fix, maintain, stabilize and suppress the prices paid for crawfish by, among other things:

- (a) agreeing to establish the prices paid for crawfish; and
- (b) agreeing to adhere to the established prices.

4. For the purpose of forming and carrying out the charged combination and conspiracy, the defendant and co-conspirators did those things that they combined and conspired to do, including, among other things:

- (a) participating in discussions about the prices of crawfish;
- (b) agreeing, in the course of those discussions, on the prices they would pay fisherman and farmers for crawfish;
- (c) agreeing, in the course of those discussions, that the agreed upon prices would go into effect on a certain date;
- (d) agreeing to adhere to the established prices; and
- (e) monitoring and enforcing compliance

with the agreements to adhere  
to the established prices.

## II.

### DEFENDANT AND CO-CONSPIRATORS

5. Seafood Incorporated of Henderson, Louisiana is a corporation organized and existing under the laws of the State of Louisiana with its principal place of business in Henderson, Louisiana. Seafood Incorporated of Henderson, Louisiana is a wholly owned subsidiary of Southern Seafood of Louisiana, Inc. Between approximately 1987 and 1991, Seafood Incorporated of Henderson, Louisiana was also known as Seafood Incorporated and Acadiana Fresh Seafood, Incorporated. The name Seafood Incorporated of Henderson, Louisiana as used in this information describes the corporation under its former and present names. During the time period covered by this information, Seafood Incorporated of Henderson, Louisiana was engaged in the business of buying, selling, processing and peeling of crawfish and crab products nationwide.

6. Various individuals and corporations, not made defendants herein, participated as co-conspirators in the offense charged and performed acts and made statements in furtherance thereof.

7. Whenever in this information reference is made to any act, deed or transaction of a corporation, the allegation means that the corporation engaged in the act,

deed or transaction by or through its officers, directors, agents, employees or representatives while they were actively engaged in the management, direction, control or transaction of its business or affairs.

**III.**

**TRADE AND COMMERCE**

8. The business activities of the defendant and co-conspirators that are the subject of this information were within the flow of, and substantially affected, interstate trade and commerce.

**IV.**

**JURISDICTION AND VENUE**

9. The combination and conspiracy charged in this information was carried out, in part, within the

Western District of Louisiana, within the five years preceding the filing of this information.

Dated:

"/s/"  
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Antitrust Division

"/s/"  
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