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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA \* CRIMINAL DOCKET NO. 19-247**

**v. \* SECTION: "E"**

**INDIAN RIDGE SEAFOOD, LLC \***

**\***

**\* \* \***

**FACTUAL BASIS**

The above-named defendant, **INDIAN RIDGE SEAFOOD, LLC** (“**INDIAN RIDGE SEAFOOD**”), has agreed to plead guilty to Count One of the Amended Bill of Information charging defendant with misdemeanor Lacey Act violations under 16 U.S.C. §§ 3372(a)(2)(A) and 3373(d)(2). Should this matter have gone to trial, the United States of America would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimony, physical and demonstrative evidence, the following facts to support the allegations against the defendant:

Unless stated otherwise, all of the facts set forth herein occurred within the Eastern District of Louisiana.

**VIOLATION OF THE LACEY ACT**

From in or around January 2015 to the present, the defendant, **INDIAN RIDGE SEAFOOD, LLC** (“**INDIAN RIDGE SEAFOOD**”), was a company based in Terrebonne Parish in the Eastern District of Louisiana. W.G. was the owner of **INDIAN RIDGE SEAFOOD**. From January 2015 to the present, W.G. had a license from the Louisiana

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Defendant WR  
Defense Counsel AL

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Department of Wildlife and Fisheries to operate as a wholesaler and retailer of seafood. The defendants were in the business of selling oysters to commercial wholesaler and distributors.

Pursuant to state law, in order to operate as a wholesaler or retailer of seafood in the state, licensees must abide by state laws, rules, and regulations and to keep informed of updates and changes to those laws, rules, and regulations. Among those rules are Title 56, Louisiana Revised Statute 56, et seq, which includes a requirement that wholesalers/retailers maintain proper records and submit monthly submissions to the Louisiana Department of Wildlife and Fisheries, on or before the tenth day of each month, all commercial receipt forms representing actual transactions with every commercial fisherman (i.e. Trip Tickets) from the preceding month.

From on or about January 1, 2017 through March 19, 2019, in the Eastern District of Louisiana and elsewhere, the defendant, **INDIAN RIDGE SEAFOOD**, did knowingly sell and transport oysters in interstate commerce, with a market value in excess of \$350 when, in the exercise of due care, **INDIAN RIDGE SEAFOOD** should have known that said oysters were possessed in violation of law. Specifically, **INDIAN RIDGE SEAFOOD** did intentionally fail to submit Trip Tickets, as required by the laws of the State of Louisiana, including Revised Statutes, R.S. 56:306.4, R.S. 56:306.5, and R.S. 56:306.6.

For the above time period, the defendant sold approximately 14,346 sacks of Louisiana oysters (white and green tagged) to out of state seafood businesses. These transactions had a market value of approximately \$656,865.

**INDIAN RIDGE SEAFOOD** was aware of the requirement that it had to maintain proper records of their sales to out of state businesses. On or about October 10, 2018, officers with the LDWF conducted a dealer inspection at **INDIAN RIDGE SEAFOOD**, located in

AUSA JKE  
Defendant WB  
Defense Counsel WA

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Terrebonne Parish. The LDWF found violations of Louisiana state law due to the defendants' failure to maintain and report records of oyster sales. W.G. submitted some of the records to the LDWF in September 2019.

**INDIAN RIDGE SEAFOOD** agrees that it was aware of the requirements to keep accurate records and to submit monthly Trip Tickets to the LDFW, and failed to exercise due care in not remitting the tickets for over a year. **INDIAN RIDGE SEAFOOD** agrees that during the time period of January 1, 2017 through March 19, 2019, it failed to report approximately 14,346 sacks of Louisiana oysters, valued at approximately \$656,865. Further, **INDIAN RIDGE SEAFOOD** agrees that this Factual Basis alleges sufficient facts to support the offense charged in Count 1 of the Amended Bill of Information.

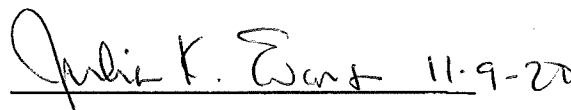
READ AND APPROVED:



ARIS W. COX, VI  
Counsel for defendant


11-7-2020

DATE



Assistant U.S. Attorney


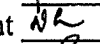
JULIA K. EVANS



Walter Guidry, Jr. for  
INDIAN RIDGE SEAFOOD, LLC  
Defendant

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AUSA   
Defendant   
Defense Counsel 