

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

UNITED STATES OF AMERICA	)	I N D I C T M E N T
	)	
V.	)	CRIMINAL NO.: [filed 1/18/84]
	)	
CHARLES J. FRIEDMAN AND	)	
PAMELA A. FRIEDMAN,	)	VIOLATIONS:
	)	18 U.S.C. § 371
Defendants.	)	18 U.S.C. § 1503

COUNT ONE  
(18 U.S.C. § 371)

THE GRAND JURY CHARGES:

1. CHARLES J. FRIEDMAN and PAMELA A. FRIEDMAN are hereby indicted and made defendants in the charge stated below.

2. At all times relevant to this Indictment, Charles J. Friedman and Pamela A. Friedman were the owners and/or principal operators of Seafood Incorporated; Seafood Incorporated of Henderson, Louisiana; Southern Seafood of Louisiana, Inc.; Acadiana Fresh Seafood, Inc.; and A.F. Holding Company, with their places of business located in Henderson, Louisiana, and engaged in the business of buying, peeling, selling and processing seafood, including crawfish and crabs.

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

4. From May 15, 1991, and continuing thereafter until the date

of the return of this Indictment, Grand Jury #90-2 and Grand Jury #92-01 having been duly impaneled and sworn in the United States District Court for the Western District of Louisiana, were engaged in the due administration of justice in that they were conducting an official investigation (hereinafter "grand jury investigation") to determine whether companies engaged in the business of buying, peeling, selling, and processing crawfish, or their employees, had violated or were violating any federal criminal laws, including engaging in price-fixing activity in violation of Section One of the Sherman Act (15 U.S.C. § 1).

5. On or about May 15, 1991, in furtherance of the grand jury investigation, a grand jury subpoena duces tecum was served upon Seafood Incorporated, which required the defendants, Charles J. Friedman and Pamela A. Friedman, to produce documentary materials to the grand jury on June 11, 1991. Among other things, the subpoena required them to produce, for the period January 1, 1986, through May 15, 1991, documents identifying crawfish purchases, sales, and processing; and annual reports, financial statements and statements filed with the Securities and Exchange Commission. Such records were material and relevant to the grand jury investigation.

6. Beginning sometime on or about May 15, 1991, and continuing thereafter until at least July of 1993, the exact date or dates being unknown to the grand jury, in the Western District of Louisiana,

having knowledge of the grand jury investigation and of the grand jury subpoena duces tecum, the defendants and co-conspirators, both known and unknown to the grand jury, knowingly and willfully entered into a conspiracy, agreement, and understanding to commit an offense against the United States, namely, to obstruct and impede the due administration of justice in the aforementioned grand jury investigation, in violation of Title 18, United States Code, Section 1503.

7. It was a part and object of the aforesaid conspiracy that the defendants and co-conspirators would and did agree to submit a false and misleading affidavit to the federal grand jury in response to the grand jury subpoena duces tecum commanding certain records that were material to the grand jury's investigation.

8. It was further a part and object of the aforesaid conspiracy that the defendants and co-conspirators would and did agree to withhold and conceal from the grand jury certain records which predated May 15, 1991, were commanded by the grand jury subpoena duces tecum and were material to the grand jury's investigation.

9. It was further a part and object of the aforesaid conspiracy that the defendants and co-conspirators would and did agree to burn and destroy certain records which predated May 15, 1991, were commanded by the grand jury subpoena duces tecum and were material to the grand jury's investigation.

10. In furtherance of the aforementioned conspiracy, agreement,

and understanding, and to effect its objects and purposes, the defendants and co-conspirators performed the following overt acts in the Western District of Louisiana including, but not limited to, the following:

(a) in May of 1991, the exact date or dates being unknown to the grand jury, created a false and misleading affidavit for submission

to the grand jury, in response to the grand jury subpoena duces tecum commanding certain records that were material to the grand jury's investigation;

(b) in May of 1991, the exact date or dates being unknown to the grand jury, sent a false and misleading affidavit to the Department of Justice for submission to the grand jury, in response

to the grand jury  
subpoena duces tecum  
commanding certain  
records that were  
material to the grand  
jury's investigation;

(c)between May 15, 1991 and July of 1993,  
the exact date or dates  
being unknown to the  
grand jury,

located and identified, and caused to be located  
and identified, certain  
records which predated  
May 15, 1991, were  
commanded by the grand  
jury subpoena duces  
tecum and were material  
to the grand jury's  
investigation;

(d)between May 15, 1991 and July of 1993,  
the exact date or dates  
being unknown to the  
grand jury, withheld and  
concealed, and caused

and directed the withholding and concealment of, certain records which predated May 15, 1991, were commanded by the grand jury subpoena duces tecum and were material to the grand jury's investigation; and

(e) between May 15, 1991 and October of 1991, the exact date or dates

being unknown to the grand jury, burned and destroyed, and caused and directed the burning and destruction of, certain records which predated May 15, 1991, were commanded by the grand jury subpoena duces tecum and were material to the grand jury's investigation.

**ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 371.**

**COUNT TWO**

**(18 U.S.C. § 1503)**

THE GRAND JURY FURTHER CHARGES:

1. CHARLES J. FRIEDMAN is hereby indicted and made a defendant in the charge stated below.

2. Each and every allegation in paragraphs 2, 4, and 5 of Count One is here realleged with the same force and effect as though said paragraphs were set forth in full detail.

3. In May of 1991, the exact date or dates being unknown to the grand jury, in the Western District of Louisiana, the defendant, having knowledge of the grand jury investigation, did corruptly influence, obstruct and impede, and endeavor to influence, obstruct and impede the due administration of justice in the federal grand jury sitting in the Western District of Louisiana by creating and sending, and by causing to be created and sent, and by endeavoring to create and send, a false and misleading affidavit to the Department of Justice for submission to the grand jury, in response to the grand jury subpoena duces tecum commanding certain records that were material to the grand jury's investigation, in violation of Title 18, United States Code, Section 1503.

ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1503.

**COUNT THREE**  
**(18 U.S.C. § 1503)**

THE GRAND JURY FURTHER CHARGES:

1. CHARLES J. FRIEDMAN and PAMELA A. FRIEDMAN are hereby indicted and made defendants in the charge stated below.

2. Each and every allegation in paragraphs 2, 4, and 5 of Count One of this Indictment is here realleged with the same force and effect as though said paragraphs were set forth in full detail.

3. Between May 15, 1991 and July of 1993, the exact date or dates being unknown to the grand jury, in the Western District of Louisiana, the defendants, having knowledge of the grand jury investigation, did corruptly influence, obstruct and impede, and endeavor to influence, obstruct and impede the due administration of justice in the federal grand jury sitting in the Western District of Louisiana by withholding and concealing, and by causing to be withheld and concealed, and by endeavoring to withhold and conceal, certain records which predated May 15, 1991, which were commanded by the grand jury subpoena duces tecum and which were material to the grand jury's investigation, in violation of Title 18, United States Code, Section 1503.

ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1503.

**COUNT FOUR**  
**(18 U.S.C. § 1503)**



THE GRAND JURY FURTHER CHARGES:

1. CHARLES J. FRIEDMAN and PAMELA A. FRIEDMAN are hereby indicted and made defendants in the charge stated below.

2. Each and every allegation in paragraphs 2, 4, and 5 of Count One of this Indictment is here realleged with the same force and effect as though said paragraphs were set forth in full detail.

3. Between May 15, 1991 and October of 1991, the exact date or dates being unknown to the grand jury, in the Western District of Louisiana, the defendants, having knowledge of the grand jury investigation, did corruptly influence, obstruct and impede, and endeavor to influence, obstruct and impede the due administration of justice in the federal grand jury sitting in the Western District of Louisiana by burning and destroying, and by causing to be burned and destroyed, and by endeavoring to burn and destroy, certain records, which predated May 15, 1991, which were commanded by the grand jury subpoena duces tecum and which were material to the grand jury's investigation, in violation of Title 18, United States Code, Section 1503. ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1503.

Dated this \_\_\_\_\_ day of \_\_\_\_\_ 1994.

A TRUE BILL

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FOREMAN

\_\_\_\_\_  
"/s/"  
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