

**U.S. House of Representatives**  
**Committee on Natural Resources**  
**Washington, DC 20515**

March 18, 2024

Joshua Farinella  
c/o Jennifer Gibson  
Legal Director  
The Signals Network  
268 Bush Street #4216  
San Francisco, CA 94104

Dear Mr. Farinella:

We are disturbed by the widespread presence of forced labor and human rights violations in the seafood supply chain. As the single largest importer of seafood in the world, the U.S. holds tremendous market influence over the operations of global fisheries. The actions of U.S.-based importers and seafood companies disproportionately affect the health and safety of all seafood products and the likelihood that seafood is not produced with forced labor or through illegal, unregulated, or unreported fishing practices.

We understand you are in possession of evidence suggesting potential violations of at least five laws and policies by Choice Canning Company, Inc.:

- 1) Section 307 of the *Tariff Act of 1930* prohibits importing into the United States any good derived, wholly or in part, from forced labor,
- 2) The *Lacey Act* prohibits importing or selling illegally obtained fish products,
- 3) The *Magnuson-Stevens Fishery Conservation and Management Act* prohibits fraudulent reporting through the Seafood Import Monitoring Program,
- 4) The *Federal Food, Drug, and Cosmetic Act* prohibits the illegal use of antibiotics, and
- 5) Best Aquaculture Practices (BAP) certification attempts to ensure “that producers are following best practices to deliver farmed seafood safely and responsibly.”<sup>1</sup>

The House Committee on Natural Resources has jurisdiction under House Rule X.1(m) to conduct oversight and investigations of all matters relating to fisheries. As part of the Committee’s ongoing efforts to reduce human rights violations and increase transparency in the seafood supply chain, we request the following documentation related to Choice Canning Company, Inc.’s operations in India as soon as possible, but not later than April 2, 2024, including but not limited to:

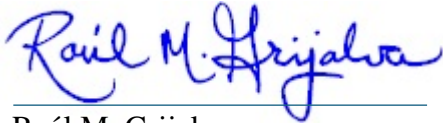
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<sup>1</sup> “What We Do: Certification,” Best Aquaculture Practices, 2023. <https://bapcertification.org/WhatWeDo>

1. Spreadsheets of worker headcounts and wages,
2. Text messages and WhatsApp messages,
3. Emails,
4. Documents and recorded phone conversations, including those with the CEO and senior management based in New Jersey.

Please contact the Oversight and Investigations Subcommittee staff at (202) 225-6065 with any questions about this request. Thank you for your attention to this matter.

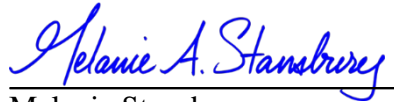
Sincerely,



Raúl M. Grijalva  
Ranking Member  
Committee on Natural Resources



Jared Huffman  
Ranking Member  
Subcommittee on Water, Wildlife, and  
Fisheries  
Committee on Natural Resources



Melanie Stansbury  
Ranking Member  
Subcommittee on Oversight and Investigations  
Committee on Natural Resources

## Responding to Committee Document Requests

In responding to document requests from the Committee on Natural Resources, please apply the instructions and definitions set forth below:

### Instructions

1. In complying with the request, you should produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You should also produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party. Requested records, documents, data, or information should not be destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee.
2. In the event that any entity, organization, or individual denoted in this request has been, or is currently, known by any other name than that herein denoted, the request should be read also to include them under that alternative identification.
3. Documents must be provided in electronic form (i.e., memory stick, thumb drive, or internet-based). Documents produced should also be organized, identified, and indexed electronically. Documents should be produced in their native file format. For example, emails from Microsoft Outlook should have a “.pst” file extension, Excel files should have an “.xls\_” or similar extension, and Microsoft Word documents should have a “.doc\_” extension. Consult with the Committee to determine the appropriate format in which to produce the information.
4. Each document produced should be produced in a form that renders the document capable of being copied.
5. Documents produced to the Committee should include an index describing the contents of the production. To the extent more than one CD, hard drive, memory stick, thumb drive, or folder transmitted through the internet is produced, each should contain an index describing its contents.
6. Documents produced in response to this request should be produced together with copies of file labels, dividers or identifying markers with which they were associated when this request was issued. To the extent that documents were not stored with file labels, dividers, or identifying markers, they should be organized into separate folders by subject matter prior to production.
7. When you produce documents, you should identify the paragraph in the Committee’s schedule to which the documents respond.
8. It shall not be a basis for refusal to produce documents that any other person or entity also possesses a non-identical or identical copy of the same documents.

9. If compliance with the request cannot be made in full, compliance should be made to the extent possible and should include an explanation of why full compliance is not possible.
10. In the event that any document or part of a document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document or part of a document: (a) the privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author and addressee; and (e) the relationship of the author and addressee to each other.
11. If any document responsive to this request was, but no longer is, in your possession, custody, or control, you should identify the document (stating its date, author, subject and recipients) and explain the circumstances by which the document ceased to be in your possession, custody, or control.
12. If a date or other descriptive detail set forth in this request referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, you should produce all documents which would be responsive as if the date or other descriptive detail were correct.
13. This request is continuing in nature and applies to any newly-discovered information. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the return date should be produced immediately upon location or discovery subsequent thereto.
14. All documents should be Bates-stamped sequentially and produced sequentially.
15. Documents produced to the Committee in response to this request should be delivered to majority staff in Room 1324 of the Longworth House Office Building or directly through the internet.

#### Definitions

1. The term "**document**" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, interoffice and intra-office communications, electronic mail (e-mail), contracts, cables, notations of any type of conversation, telephone calls, text messages, MMS or SMS messages, other mobile-to-mobile messages, instant messages or online chat messages, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices

thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, voice mails, microfiche, microfilm, videotape, recordings and motion pictures), and electronic and mechanical records or representations of any kind (including, without limitation, tapes, cassettes, disks, computer server files, computer hard drive files, CDs, DVDs, memory sticks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.

2. The term "**documents in your possession, custody, or control**" means (a) documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, or representatives acting on your behalf; (b) documents that you have a legal right to obtain, that you have a right to copy, or to which you have access; and (c) documents that you have placed in the temporary possession, custody, or control of any third party.
3. The term "**communication**" means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether face-to-face, in a meeting, by telephone, facsimile, mail, e-mail (desktop or mobile device), text message, MMS or SMS message, other mobile-to-mobile message, instant message or online chat, telexes, releases, personal delivery, or otherwise.
4. The terms "**and**" and "**or**" shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information which might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neuter genders.
5. The terms "**person**" or "**persons**" means natural persons, firms, partnerships, associations, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, or other legal, business or government entities, and all subsidiaries, affiliates, divisions, departments, branches, and other units thereof.
6. The term "**identify**," when used in a question about individuals, means to provide the following information: (a) the individual's complete name and title; and (b) the individual's business address and phone number.
7. The terms "**referring or relating**," with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with or is in any manner whatsoever pertinent to that subject.
8. The term "**employee**" means agent, borrowed employee, casual employee, consultant, contractor, de facto employee, independent contractor, joint adventurer, loaned employee, part-time employee, permanent employee, provisional employee, subcontractor, or any other type of service provider.