

# **EXHIBIT 11**

## AFFIDAVIT OF FREDERIC GOLFEIN

To Whom it may Concern:

1. In the late Spring of 2009, Philip Wachs and I began to seriously consider attempting to purchase Agriprocessors. We had been following the matter in the press and indeed we were as well acquainted as outsiders could be. Mr. Wachs was the former President of a NYSE listed company that had both manufacturing and retail components. He had at his disposal many different funding sources and had experience in various areas that we believed would be appropriate in such a venture. I am an attorney with over 30 years experience some of which involved representing manufacturing companies and indeed I actually had some experience in representing parties in certain disputes in the kosher poultry manufacturing industry. In addition, we felt that certain management skills I had would compliment Mr. Wachs' vast experience and financial connections.

2. We also felt that certain connections we have in Jewish communities might be helpful in trying to restore this company. We created certain basic plans as to how we would try to reshape and improve the tarnished image of Agriprocessors. We actually even developed a name and an initial strategy.

3. While we knew that Mr. Sholom M. Rubashkin had then pending some potentially serious allegations against him and that he would not be involved, we did believe that other members of the prior existing management team, including some

members of the Rubashkin family, might be available to continue as part of the new management team we would assemble.

4. We appropriately registered with the trustee's website and obtained the information available. We then travelled to Postville for a firsthand look at the situation. On that day, in a private meeting with one of the Triax members we were told that they felt that government would never approve any transaction if the Rubashkins were in any way involved. We were somewhat surprised by that and were very curious. We were told that since it was in the Bankruptcy Court no plan would ever be approved that involved them. That did not make any sense to us since we were not involved in any reorganization plan but we were told that the government could and would block our transaction if the Rubashkins were involved.

5. Subsequently, in a conference call that Mr. Wachs and I had with Triax, we were told that "no one whose last name begins with an R" could be involved in management.

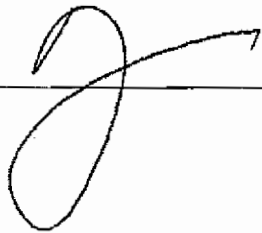
6. We were also told that there was still a potential action that the U.S. Attorney could bring against the trademarks for the products and certain other items of value if the Rubashkins were involved.

7. Incidentally that same thing was told to us when we met Mr. Daniel Hirsch and one of his financial staff members.

8. We continued to be interested in the transaction but started to move much more slowly after receiving this information (about the Rubashkins not being allowed to be involved). We contacted another person who we felt we might bring into the

management team but we were indeed concerned that it would be a much more difficult transition and a more risky transaction if we lacked the continuity of any of the prior Rubashkin family management in our management.

Pursuant to 28 U.S.C. 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



A handwritten signature in black ink, consisting of a large, stylized loop that crosses itself, positioned above a horizontal line that extends across the page.