

OCT 10 1972

UNITED STATES DEPARTMENT OF AGRICULTURE  
BEFORE THE SECRETARY OF AGRICULTURE

In re: ) P & S Docket No. D-12- 0072  
)  
Mohammad S. Malik )  
and )  
Kiran Enterprises, Inc. d.b.a. )  
Trenton Halal Meat Packing Co., )  
)  
Respondents ) Complaint and Notice of Hearing

There is reason to believe that the Respondents named herein have willfully violated provisions of the Packers and Stockyards Act, 1921, as amended and supplemented (7 U.S.C. § 181 *et seq.*), (Act), and therefore, this Complaint and Notice of Hearing is issued alleging the following:

I

(a) Mohammad S. Malik is an individual who is President and fifty percent owner of Kiran Enterprises, Inc. d.b.a. Trenton Halal Meat Packing Co., a corporation organized and existing under the laws of the State of New Jersey. Taken together, Mohammad S. Malik and Kiran Enterprises, Inc. d.b.a. Trenton Halal Meat Packing are herein referred to as the Respondents. Respondents' business mailing address is 610 Roebling Avenue, Trenton, NJ 08611.

(b) The Respondents, at all times material herein, were:

1. Engaged in the business of buying livestock in commerce for the purposes of slaughter and manufacturing or preparing meats or meat products for sale or shipment in commerce; and
2. Operating as a packer within the meaning of and subject to the

Provisions of the Act.

## II

On or about the dates and in the transactions set forth in Appendix A, Respondents purchased livestock and failed to pay, when due, the full purchase price of such livestock.

## III

By reason of the facts alleged in paragraph II herein, Respondents have willfully violated sections 202(a) and 409 of the Act (7 U.S.C. §§192(a) and 228b).

WHEREFORE, it is hereby ordered that for the purpose of determining whether Respondents have in fact willfully violated the Act, this Complaint and Notice of Hearing shall be served upon Respondents. Respondents shall have twenty (20) days after receipt of this Complaint and Notice of Hearing in which to file an answer with the Hearing Clerk, United States Department of Agriculture, Washington, D.C. 20250, in accordance with the Rules of Practice governing proceedings under the Act (7 C.F.R. § 1.130 et seq.). Failure to file an answer shall constitute an admission of all the material allegations of this Complaint and Notice of Hearing.

Respondents are hereby notified that unless hearing is waived, either expressly or by failure to answer and request a hearing, a hearing will be held in accordance with the Rules of Practice, at a place and time to be designated later. At the hearing, Respondents will have the right to appear and show cause why an appropriate Order should not be issued in accordance with the provisions of the Act which requires that Respondents cease and desist from violating the Act with respect to matters alleged herein and assesses

such civil penalties as are authorized by the Act and warranted under the circumstances.

Done at Washington, D.C.  
this 17 day of November 2011



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Alan R. Christian  
Deputy Administrator  
Packers and Stockyards Program

Brian Sylvester, Esq.  
Attorney for Complainant  
U.S. Department of Agriculture  
Office of the General Counsel  
Regulatory Division  
1400 Independence Avenue, S.W.  
Room 2319  
Washington, D.C. 20250-1413

## Appendix A

### Schedule of Failure to Pay When Due for Livestock Purchases Entity Information

Entity			DBA					Mailing Address		
Kiran Enterprises, Inc. and Mohammad S. Malik			Trenton Halal Meat Packing Company					610 Roeling Ave Trenton, NJ 08611		
Purchase Date	Seller's Name	Number of Head	Total Invoice	Due Date	Payment Date	Payment Instrument	Payment Instrument Number	Payment Amount	Days Late Per Instrument Date	Remarks
7/30/2009	Larry Crenwelge d/b/a Larry's Livestock - Balance of invoice included in beginning Accounts Payable Balance	N/A	\$11,979.62	N/A	8/26/2009	Wire	400139	\$11,979.62	N/A	Balance of prior invoice on 7/30/2009 - Total wire of \$50,000 paid off remaining balance as of 7/30/09 - \$11,979.62, the entire balance for 8/4 invoice \$26,937.15, and \$11,083.23 of an 8/11 invoice
8/4/2009	Larry Crenwelge d/b/a Larry's Livestock (Junction Stockyards, Inc. Invoice)	420	\$26,937.15	8/5/2009	8/26/2009	Wire	400139	\$26,937.15	21	Total wire of \$50,000 paid off remaining balance as of 7/30/09 - \$11,979.62, the entire balance for 8/4 invoice \$26,937.15, and \$11,083.23 of an 8/11 invoice
8/11/2009	Larry Crenwelge d/b/a Larry's Livestock (Junction Stockyards, Inc. Invoice)	784	\$51,640.08	8/12/2009	8/26/2009	Wire	400139	\$11,083.23	14	Total wire of \$50,000 paid off remaining balance as of 7/30/09 - \$11,979.62, the entire balance for 8/4 invoice \$26,937.15, and \$11,083.23 of 8/11 invoice
					9/3/2009	Wire	400435	\$40,556.85	22	Total wire of 60,000 paid remaining balance of 8/12 invoice \$40,556.85 and \$19,443.15 of 8/17 invoice.
								\$51,640.08		
8/15/2009	Larry Crenwelge d/b/a Larry's Livestock (Junction Stockyards, Inc. Invoice)	470	\$31,214.83	8/17/2009	9/3/2009	Wire	400435	\$19,443.15	17	Total wire of 60,000 paid remaining balance of 8/12 invoice \$40,556.85 and \$19,443.15 of 8/17 invoice
					9/11/2009	Wire	400098	\$11,771.48	25	Total wire of 50,000 paid remaining balance of 8/17 invoice \$11,771.48 and \$38,228.52 of 8/18 invoice
								\$31,214.83		
8/18/2009	Larry Crenwelge d/b/a Larry's Livestock (Junction Stockyards, Inc. Invoice)	810	\$51,799.91	8/19/2009	9/11/2009	Wire	400098	\$38,228.52	23	Total wire of 50,000 paid remaining balance of 8/17 invoice \$11,771.48 and \$38,228.52 of 8/18 invoice
					9/17/2009	Wire	400299	\$13,571.39	29	Total wire of 50,000 paid remaining balance of 8/18 invoice \$13,571.39, the entire 8/23 invoice \$31,078.24 and \$5,350.27 of 8/25 invoice
								\$51,799.91		

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Kiran Enterprises, Inc. and Mohammed S. Malik			Trenton Halal Meat Packing Company					610 Roeling Ave Trenton, NJ 08611		
Purchase Date	Seller's Name	Number of Head	Total Invoice	Due Date	Payment Date	Payment Instrument	Payment Instrument Number	Payment Amount	Days Late Per Instrument Date	Remarks
8/22/2009	Larry Crenwelge d/b/a Larry's Livestock (Junction Stockyards, Inc. Invoice)	447	\$31,078.24	8/24/2009	9/17/2009	Wire	400299	\$31,078.24	24	Total wire of 50,000 paid remaining balance of 8/18 invoice \$13,571.58, the entire 8/23 invoice \$31,078.24 and \$5,350.27 of 8/25 invoice
8/25/2009	Larry Crenwelge d/b/a Larry's Livestock (Junction Stockyards, Inc. Invoice)	657	\$46,240.12	8/28/2009	9/17/2009	Wire	400299	\$5,350.37	22	Total wire of 50,000 paid remaining balance of 8/18 invoice \$13,571.58, the entire 8/23 invoice \$31,078.24 and \$5,350.27 of 8/25 invoice
					9/24/2009	Wire	400209	\$40,889.75	29	Total wire of 50,000 paid remaining of an 8/25 invoice \$40,889.75 and \$9,110.25 of 9/1 invoice
								\$46,240.12		
9/1/2009	Larry Crenwelge d/b/a Larry's Livestock (Junction Stockyards, Inc. Invoice)	788	\$53,084.73	9/2/2009	9/24/2009	Wire	400209	\$9,110.25	22	Total wire of 50,000 paid remaining of an 8/25 invoice \$40,889.75 and \$9,110.25 of 9/1 invoice
					10/5/2009	Wire	400536	\$43,974.48	33	Total wire of 50,000 paid remaining balance of \$43,974.48 of 9/1/09 invoice plus \$6,025.52 of an 9/6/09 invoice
								\$53,084.73		
9/6/2009	Larry Crenwelge d/b/a Larry's Livestock (Junction Stockyards, Inc. Invoice)	425	\$29,663.34	9/8/2009	10/5/2009	Wire	400536	\$6,025.52	27	Total wire of 50,000 paid remaining balance of \$43,974.48 of 9/1/09 invoice plus \$6,025.52 of an 9/6/09 invoice
					10/13/2009	Wire	400645	\$23,637.82	35	Total wire of 45,000 paid remaining balance of \$23,637.82 for 9/6 as well \$21,362.18 of 9/13/09
								\$29,663.34		
9/11/2009	Larry Crenwelge d/b/a Larry's Livestock (Junction Stockyards, Inc. Invoice)	452	\$32,220.27	9/14/2009	10/13/2009	Wire	400645	\$21,362.18	29	Total wire of 45,000 paid remaining balance of \$23,637.82 for 9/6 as well \$21,362.18 of 9/13/09
					10/20/2009	Wire	400372	\$10,858.09	36	Total wire of 50,000 paid remaining balance of \$10,858.09 for 9/13/09 plus entire invoice of \$37,662.07 for 9/15. It also paid \$1,479.84 of 9/22/09 invoice

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Purchase Date	Seller's Name	Number of Head	Total Invoice	Due Date	Payment Date	Payment Instrument	Payment Instrument Number	Payment Amount	Days Late Per Instrument Date	Remarks
								\$32,220.27		
9/15/2009	Larry Crenweige d/b/a Larry's Livestock (Junction Stockyards, Inc. Invoice)	540	\$37,662.07	9/16/2009	10/20/2009	Wire	400372	\$37,662.07	34	Total wire of 50,000 paid remaining balance of 10,858.09 for 9/13/09 plus entire invoice of \$37,662.07 for 9/15. It also paid \$1,479.84 of 9/22/09 invoice
9/22/2009	Larry Crenweige d/b/a Larry's Livestock (Junction Stockyards, Inc. Invoice)	672	\$45,470.40	9/23/2009	10/20/2009	Wire	400372	\$1,479.84	27	Total wire of 50,000 paid remaining balance of \$10,858.09 for 9/13/09 plus entire invoice of \$37,662.07 for 9/15. It also paid \$1,479.84 of 9/22/09 invoice
					10/26/2009	Wire	400448	\$43,990.56	33	Total wire of 85,000 paid remaining balance of \$43,990.56 for 9/22/09 as well as \$41,009.44 of 9/29/09
								\$45,470.40		
8/11/2009	Southwest Livestock Exchange, Inc.	387	\$21,226.71	8/12/2009	8/13/2009	Wire	400175	\$4,657.21	1	Total wire of 20,000 paid for remainder of 8/11 invoice as well as \$16,342.79 for 8/4/09 invoice
					8/20/2009	Wire	400437	\$16,569.50	8	Total wire of 20,000 paid remainder of 8/11 invoice as well as \$3,430.60 of 8/18 invoice
								\$21,226.71		
8/18/2009	Southwest Livestock Exchange, Inc.	447	\$24,404.05	8/19/2009	8/20/2009	Wire	400437	\$3,430.50	1	Total wire of 20,000 paid 3430.50 of 8/18 invoice as well as \$16,569.50 of 8/11/09 invoice
					8/27/2009	Wire	400331	\$15,000.00	8	Total wire of 16,000 paid portion of 8/18 invoice
					9/2/2009	Wire	20090902-00045097	\$5,973.55	14	Total wire of 16,000 paid remainder of 8/18/09 invoice, the entire balance for 8/25/09 and \$6,822.17 for 9/1/09 invoice
								\$24,404.05		

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Purchase Date	Seller's Name	Number of Head	Total Invoice	Due Date	Payment Date	Payment Instrument	Payment Instrument Number	Payment Amount	Days Late Per Instrument Date	Remarks
8/25/2009	Southwest Livestock Exchange, Inc.	37	\$2,204.28	8/26/2009	9/2/2009	Wire	20090902-00045097	\$2,204.28	7	Total wire of 15,000 paid remainder of 8/18/09 invoice, the entire balance for 8/25/09 and \$6,822.17 for 9/1/09 invoice
9/1/2009	Southwest Livestock Exchange, Inc.	340	\$20,913.30	9/2/2009	9/2/2009	Wire	20090902-00045097	\$6,822.17	Timely	Total wire of 15,000 paid remainder of 8/18/09 invoice, the entire balance for 8/25/09 and \$6,822.17 for 9/1/09 invoice
					9/14/2009	Wire	400537	\$14,091.13	12	Total wire of 20,000 paid remainder of 9/1/09 invoice as well as entire invoice for 9/8/08, and advance of \$808.63 on 9/15/09 invoice
								\$20,913.30		
9/8/2009	Southwest Livestock Exchange, Inc.	81	\$5,100.79	9/9/2009	9/14/2009	Wire	400537	\$5,100.79	5	Total wire of 20,000 paid remainder of 9/1/09 invoice as well as entire invoice for 9/8/08, and advance of \$808.63 on 9/15/09 invoice
9/15/2009	Southwest Livestock Exchange, Inc.	216	\$12,446.43	9/16/2009	9/14/2009	Wire	400537	\$808.08	Timely	Total wire of 20,000 paid remainder of 9/1/09 invoice as well as entire invoice for 9/8/08, and advance of \$808.63 on 9/15/09 invoice
					10/1/2009	Wire		\$11,638.35	15	Total wire of 15,000 paid remainder of 9/15/09 invoice as well as \$3,361.65 of 9/22/09 invoice
								\$12,446.43		
9/22/2009	Southwest Livestock Exchange, Inc.	102	\$6,475.30	9/23/2009	10/1/2009	Wire		\$3,361.65	8	Total wire of 15,000 paid remainder of 9/15/09 invoice as well as \$3,361.65 of 9/22/09 invoice
					10/15/2009	Wire	400427	\$3,113.65	22	Total wire of 15,000 paid remainder of 9/22/09 invoice as well as all of 9/29/09 invoice, and \$6,804.95 of 10/8/09 invoice
								\$6,475.30		
9/29/2009	Southwest Livestock Exchange, Inc.	79	\$5,081.40	9/30/2009	10/15/2009	Wire	400427	\$5,081.40	15	Total wire of 15,000 paid remainder of 9/22/09 invoice as well as all of 9/29/09 invoice, and \$6,804.95 of 10/8/09 invoice

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Purchase Date	Seller's Name	Number of Head	Total Invoice	Due Date	Payment Date	Payment Instrument	Payment Instrument Number	Payment Amount	Days Late Per Instrument Date	Remarks
10/1/2009	Southwest Livestock Exchange, Inc.	123	\$8,537.61	10/2/2009	10/15/2009	Wire	400427	\$6,804.95	13	Total wire of 15,000 paid remainder of 9/22/09 invoice as well as all of 9/29/09 invoice, and \$6,804.95 of 10/6/09 invoice
					11/2/2009	Wire		\$1,732.66	26	Total wire of 15,000 paid remainder of 10/6 invoice as well as entire 10/13 and 10/20 invoices, and \$2,889.01 of 10/27/09 invoice
								\$8,537.61		
10/13/2009	Southwest Livestock Exchange, Inc.	78	\$5,228.33	10/14/2009	11/2/2009	Wire		\$5,228.33	19	Total wire of 15,000 paid remainder of 10/6 invoice as well as entire 10/13 and 10/20 invoices, and \$2,889.01 of 10/27/09 invoice
10/20/2009	Southwest Livestock Exchange, Inc.	71	\$5,150.00	10/21/2009	11/2/2009	Wire		\$5,150.00	12	Total wire of 15,000 paid remainder of 10/6 invoice as well as entire 10/13 and 10/20 invoices, and \$2,889.01 of 10/27/09 invoice