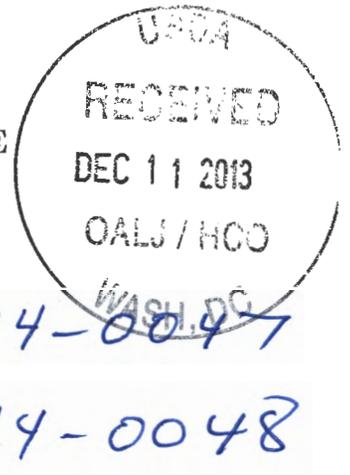


UNITED STATES DEPARTMENT OF AGRICULTURE  
BEFORE THE SECRETARY OF AGRICULTURE



In re: )  
)  
C.H. Cattle Company, LLC, ) P&S Docket No. 14-0047  
And )  
Leonard Craig Hammond, ) P&S Docket No. 14-0048  
)  
)  
Respondents. )  
)  
) Complaint

There is reason to believe that respondents willfully violated the Packers and Stockyards Act, 1921, as amended and supplemented (7 U.S.C. §§ 181-229) (Act) and the regulations promulgated thereunder by the Secretary of Agriculture (9 C.F.R. §§ 201.1-.200) (regulations), and therefore this complaint is issued alleging:

I.

(a) C.H. Cattle Company (Respondent C.H. Cattle) is a limited liability company organized under the laws of the Commonwealth of Virginia with an operating and mailing address of 25577 Blue Hills Drive, Glade Spring, VA 24340.

(b) At all times material to this case, Respondent C.H. Cattle was:

(1) Registered with the Secretary of Agriculture as a dealer to buy and sell livestock for its own account, subject to the provisions of the Act; and

(2) Engaged in the business of a dealer buying and selling livestock in commerce for its own account.

(c) Leonard Craig Hammond (Respondent Hammond) is an individual, whose

business and home mailing address is 25577 Blue Hills Drive, Glade Spring, VA 24340.

(d) Respondent Hammond, at all times material to this complaint, is:

(1) The president, manager, and 100% shareholder of Respondent C.H. Cattle;

(2) Responsible for the direction, management, and control of Respondent C.H. Cattle;

(3) Operator of C.H. Cattle Company, LLC as his alter ego; and

(4) A dealer within the meaning of, and subject to the provisions of, the Act.

## II.

From the period of October 22<sup>nd</sup> to November 29<sup>th</sup>, 2012, in approximately eleven (11) transactions, Respondents purchased in commerce approximately three hundred and sixty four (364) head of livestock valued in excess of \$200,000 and failed to make full payment promptly to 5 livestock sellers in that Respondents paid the balance due between one and five days late for livestock.

## III.

By reason of the facts alleged in paragraph II, Respondents have willfully violated sections 312(a) and 409 of the Act (7 U.S.C. §§ 213(a), 228b) and section 201.43 of the Regulations.

WHEREFORE, it is hereby ordered that this complaint shall be served upon

Respondents for the purpose of determining whether Respondents have willfully violated the Act and the regulations. Respondents shall have twenty (20) days after receipt of this complaint 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.)(Rules of Practice). Allegations not answered shall be deemed admitted for the purpose of this proceeding. Failure to file an answer will constitute an admission of all the material allegations of this complaint.

Packers and Stockyards Program, GIPSA, requests:

1. That unless Respondents fail to file an answer within the time allowed, or file an answer admitting all the material allegations of this complaint, this proceeding be set for oral hearing in accordance with the Rules of Practice; and
2. That such order or orders be issued, including an order requiring Respondents to cease and desist from the violations of the Act found to exist, and assessing such penalties as are authorized by the Act and warranted in the premises.

Done at Washington, D.C.

this 11<sup>th</sup> day of December, 2013

Susan B. Keith  
Susan B. Keith  
Deputy Administrator  
Packers and Stockyards Program

MARGARET BURNS RATH  
Attorney for Complainant  
Office of the General Counsel  
United States Department of Agriculture  
1400 Independence Avenue, S.W.  
Room 2319, South Building  
Washington, D.C. 20250  
Telephone: (202) 720-2510