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UNITED STATES DEPARTMENT OF AGRICULTURE  
BEFORE THE SECRETARY OF AGRICULTURE

In re: ) P. & S. Docket No. D-10-0237  
)  
First World Management Services, Inc., )  
d/b/a Bios Zabeeha Halal Foods )  
and Tahawwur H. Rana, )  
)  
Respondents ) Complaint and Notice of Hearing

There is reason to believe that Respondents have willfully violated the Packers and Stockyards Act, 1921, as amended and supplemented (7 U.S.C. § 181 et seq.) (hereinafter “the Act”), and the regulations promulgated thereunder by the Secretary of Agriculture (9 C.F.R. §201.1 et seq.) (hereinafter “the regulations”). Therefore, this complaint and notice of hearing is issued alleging the following:

I

(a) First World Management Services, Inc., dba Bios Zabeeha Halal Foods (hereinafter “Corporate Respondent” or “Respondent First World”) is or was a corporation organized and existing under the laws of the State of Illinois. Its business mailing address is or was 2809 West Devon Ave., Chicago, Illinois 60659. Respondent First World’s physical business address is or was 6260 S. Kinsman Road, Kinsman, Illinois 60457.

(b) Respondent First World is, and at all times material herein was:

(1) Engaged in the business of buying livestock in commerce for the purposes of slaughter;

(2) Engaged in the business of manufacturing or preparing meat and meat food products for sale or shipment in commerce; and

(3) A packer within the meaning of and subject to the provisions of the Act.

(c) Tahawwur H. Rana (hereinafter "Individual Respondent" or "Respondent Rana") is an individual whose business mailing address is or was 2809 West Devon Ave., Chicago, Illinois 60659. Respondent Rana's physical business address is or was 6260 S. Kinsman Road, Kinsman, Illinois 60457.

(d) Respondent Rana at all times material herein was:

(1) Engaged in the business of buying livestock in commerce for the purposes of slaughter;

(2) Engaged in the business of manufacturing or preparing meat and meat food products for sale or shipment in commerce; and

(3) A packer within the meaning of and subject to the provisions of the Act.

## II

(a) On May 12, 2009, Respondents were verbally notified by a representative of the Packers and Stockyards Program that Respondents were failing to pay, when due, for livestock in accordance with the Act.

(b) On May 18, 2009, Respondents were again verbally notified by a representative of the Packers and Stockyards Program that Respondents were failing to pay, when due, for livestock in accordance with the Act.

(c) On May 18, 2009, the Packers and Stockyards Program obtained a signed affidavit from Respondent Rana, 100% shareholder of Respondent First World, wherein he acknowledged that Respondents had failed to pay, when due, for livestock purchases.

### III

Respondents, between January 3, 2009, and September 30, 2009, purchased approximately 2919 head of livestock from 6 sellers in the amount of \$234,181.41 and failed to pay, when due, for such livestock purchases. Respondents' payments were made between 3 and 82 days late.

### IV

Respondents failed to pay for livestock purchases made between March 15, 2009 and April 13, 2009 in the amount of \$77,754.53. Upon information and belief, at the time of the filing of this Complaint and Notice of Hearing, the entire amount of \$77,754.53 remained unpaid by Respondents.

### V

By reason of the facts alleged in paragraph I herein, Respondent Rana is the *alter ego* of and responsible for the direction, management and control of Respondent First World.

By reason of the facts alleged in paragraphs III and IV herein, Respondents willfully violated sections 202(a) and 409 of the Act (7 U.S.C. §§ 192(a) and 228b), and section 201.43(b) of the regulations (9 C.F.R. § 201.43(b)).

WHEREFORE, it is hereby ordered that for the purpose of determining whether Respondents have, in fact, willfully violated the Act and regulations issued thereunder, 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 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.). The answer shall be filed with an original and three copies, fully and completely stating the nature of the defense and admitting or denying, specifically and in detail, each material allegation of this complaint and notice of hearing. Allegations not answered will be deemed admitted for the purpose of this proceeding. Failure to file an answer shall constitute an admission of all the material allegations of this complaint and notice of hearing, unless prior to the time required to file an answer, the parties have agreed to a consent decision pursuant to section 1.138 of the Rules of Practice (7 C.F.R § 1.138).

Respondents are hereby notified that unless hearing is waived, either expressly or by failure to answer and request a hearing as provided by sections 1.136 and 1.141 of the Rules of Practice, a hearing will be held in accordance with the Rules of Practice, at a place and time to be later designated before an administrative law judge. 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 requiring Respondents to cease and desist from violating the Act with respect to matters alleged herein, and assessing such civil penalties as are authorized by the Act and warranted under the circumstances.

Done at Washington, D.C.

this 19 day of April, 2010

  
ALAN R. CHRISTIAN  
Deputy Administrator,  
Packers and Stockyards Program



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