

From: Paula Bacon, Mayor of Kaufman, TX (2003-2007)

I am 5th generation in Kaufman, TX, a community that spent many difficult years trying to deal with a horse slaughter plant. As a resident, business owner (P.G. Bacon Lumber Co. “Friendly Service Since 1896”), taxpayer, and one who has served 4 terms on the City Council, two as mayor, I believe a horse slaughter plant is among the very least desirable things a community would want. A horse slaughter plant ranks with a lead smelter plant and sexually oriented businesses, the dead opposite of economic development. A horse slaughter plant creates expensive environmental problems for taxpayers, profoundly affected our crime rate and stigmatizes the community as ‘that place where they slaughter horses’—and good development goes elsewhere.

Knowing what such a plant does to a community, people want to do everything they can to keep a horse slaughter plant from moving in. A horse slaughter plant creates long term m&o expenses, dominates what people think of your community and getting rid of them is almost impossible. A horse slaughter plant is a classic example of how a bad decision leads to multiple bad outcomes.

What I describe (and document) is not what might happen, it is what did happen, we lived it. Living with horse slaughter was about their making money and the community being their doormat. What we received was entirely negative, some of which is described below.

Horse slaughter interests make promises in terms of jobs and prosperity and complying with the laws, but these promises are not borne out. Horse slaughter’s promises are thoroughly refuted by the facts.

Poor pay and dangerous work, all 3 plants operating in the US in 2006 employed no more than 178 in jobs most Americans do not want (p.16). Environmental violations were the same in all 3 communities: they did not comply with the laws.

The horse slaughter plant in DeKalb was out of compliance with its wastewater permit countless times. The attached photograph (p. 17) shows the brand new, state of the art pre-treatment facility tank overflowing with foaming blood and waste. Also attached are documents showing they were in violation of environmental laws every month after they re-opened until they were closed by state law (p. 15).

The third plant in Ft. Worth had numerous, serious OSHA violations as well as environmental violations. They clogged sewer lines causing blood to spill into a nearby creek, allowed wastewater to flow onto adjacent properties and into the creek, and on another occasion the plant was found to have pumped horse blood into the creek. [See [San Antonio Current, June 19, 2003](#)].

In Saskatchewan Canada, when Natural Valley Farms horse slaughter plant went bankrupt and were ordered closed by the Canadian Food Inspection Agency, they abandoned a lagoon of over 30 million gallons of untreated waste, not including blood. After collecting the blood for resale they found there was no market for it and were subsequently caught discharging it into a nearby river.

The plant in Kaufman made repeated reference to being ‘good corporate citizens,’ but I believe that they were more like corporate thugs as they “neglected to perform within the standards required of them” (from staff report to City Council), thereby tormenting resident taxpayers and threatening expensive infrastructure. At a meeting regarding severe problems with the horse slaughter plant in 2005, the wastewater treatment plant manager informed us then that “everything is running on high, 24/7 and we have no back-up,” We are even today continuing to pay for very expensive replacements and repairs to the plant.

Had the horse slaughter plant not closed in 2007, our town would have been required to spend a minimum of \$6 million (“if we are lucky,” according to the engineers) to build a new wastewater treatment plant. Within 2 weeks of the horse slaughter plant closing, capacity at the plant increased by 52%. The risk of a mega million dollar watershed cleanup was also, thankfully taken off the table.

In 1986 the mayor at the time and council tried to keep the horse slaughter plant from re-opening. They had been closed down for a year after the State of Texas sued the City and the City sued the plant for continually violating environmental laws. [See Kaufman Herald, January 23, 1986, p. 7].

At that time there was literally blood coming up in people’s bathtubs and toilets (difficult to believe but true; please see reference in Kaufman Herald 1986. It is my understanding that the horse slaughter plant had used a pump to force waste down the sewer system, breaking pipes under the streets and one of the causes for the bloody waste in homes). As recently as 2005 the Texas Commission on Environmental Quality investigated complaints about water safety and found that

backflow prevention requirements, that prevent things like blood coming into the sinks, tubs and toilets of homes and business, were not in place. Seven months previously the City had directed the horse slaughter plant to comply with the requirements, but very typically the plant had declined to do so. The City received a hefty fine that taxpayers paid and the plant continued operations, business as usual.

The horse slaughter plant operated in continual violation of its wastewater permit. I will gladly provide you with detailed reports from my City Manager, Police Chief, and Public Works Director regarding odor and wastewater effluence violations at the Dallas Crown horse slaughter plant in the City of Kaufman. The reports reference “decaying meat [which] provides a foul odor and is an attraction for vermin and carrion,” containers conveyed “uncovered and leaking liquids,” there are “significant foul odors during the daily monitoring of the area,” and “Dallas Crown continually neglects to perform within the standards required of them.”

Reports include descriptive language such as “blood flowing east and west in the ditches from your plant,” “It has been over 45 days [it had been 59 days] and no apparent cleanup has occurred,” “Your system has not improved and subsequently it has gotten a lot worse,” “Words cannot express the seriousness” of recent violations and the “adverse effects on the wastewater treatment plant,” and “Please be sure trailers are secured before leaving your premises to prevent spills,” noting also “bones and blood laying in front of the facility,” problems with bones and parts in neighboring yards and the attraction of “dogs and other animals.”

Attached here (pp. 18ff) are a few of the many police summons showing violations related to BOD (bio-oxygen demand), TSS (total suspended solids), chemical spill, and pH. The amounts are very high; for example their permit allowed them a level of 2,000, well above the normal limit of 250. The violation on the summons shows they exceeded by 33,000 the 2,000 limit. TSS permitted was 1,500 which they exceeded by 4,200. The wastewater treatment plant was ‘shocked’ on more than one occasion by illegal pH levels.

The horse slaughter plant also denied access to the plant for environmental testing for 9 months, despite requirements by ordinance, letter agreement and court order. There was no testing done at all initially. City staff, the City Manager, the City

Council and the City Attorney all communicated to the plant manager the necessity of access to protect the wastewater treatment plant and the creek system. After 2 months the horse slaughter plant began doing their own testing with no chain of custody in place. After being in violation 2 of the first 4 samples they pulled for themselves and took to a company they paid directly for the testing, they were not in violation anymore--which had virtually never before happened in their 20+year history (see beginning December 2004 on the spreadsheet, p. 10).

During the last few years of operation, the horse slaughter plant quit paying fines, and instead requested individual jury trials for each citation issued for their violations, a cost prohibitive to the City and our legal budget. During one 19 month period the plant had \$916,000 in potential fines and demanded separate jury trials on citations for violations [see spreadsheet]. These were never resolved and the City was left 'holding the bag.'

Residents complained to the Texas Department of Health regarding blood and other matter leaking onto the streets. Containers of offal and hides leaked blood during transport on our streets and highways.

"Quite frankly, we don't want you here," the mayor at the time announced as the council meeting began in 1986. "That plant has never made a dime for this city and they never will," he said. The city administrator added the horse slaughter plant has been "a lousy part of the community." [Please see attached articles from Kaufman Herald, pp. 7ff].

This was no less true when I became mayor. The horse slaughter plant kept us ensnared in the courts with endless appeals and injunctions. They had plenty of money to keep us endlessly in court; the City's pockets were not near so deep.

And no wonder. During nuisance hearings, the horse slaughter plant was required to produce tax returns, their most recent return revealing they had paid \$5 in federal income tax on \$12 million dollars in sales. In the preceding 5 years Dallas Crown's federal income tax was .3% or 1/3 of 1% of sales. [Please see attached 2004 tax return, p. 13] A copy of the forensic analysis of the horse slaughter plant's returns [please see John S. Rainey letter, p. 14] determined that the plant sold to itself at a loss so that the profits only surfaced overseas (this involved 3 corporations, each having identical ownership).

There was no sales tax since they sold to themselves overseas and property tax revenue to the City was generally less than \$2,000 per year. We did not benefit from having a horse slaughter plant; we paid.

In August of 2005, our City Council voted unanimously to send the issue to the Board of Adjustments for termination of their non-conforming use status. In March of 2006, the Board of Adjustments voted unanimously to order Dallas Crown closed, but the plant was able to tie up enforcement in the courts until they were finally closed under state law in February of 2007. It was the 1949 state law banning horse slaughter for human consumption that was finally enforced and forced the closure of the plant.

Someone recently said to me that horse slaughter interests are arrogant and not accustomed to challenge. They think just saying something somehow makes it true and that laws and communities can be ignored. Then he added -- But they are wrong.

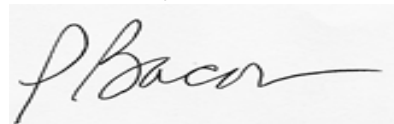
I hope he is right. It didn't ruin us but darn near. We are recovering despite the economy. Good development is occurring and our crime rate has dropped like a rock, from a rate of over 400 to 135 [See city-data.com, p. 6].

Were there any positives to having a horse slaughter plant? No, there were not. The horse slaughter plant did buy an oversized American flag for the nearby American Legion. But the flag, like horse slaughter itself, made a mockery of our community and values. It did not cover or make up for the multitude of sins horse slaughter provided.

As one neighbor said recently, "We can breathe again. Life is much better." And we buy our own flag.

Please contact me if I can be of help.

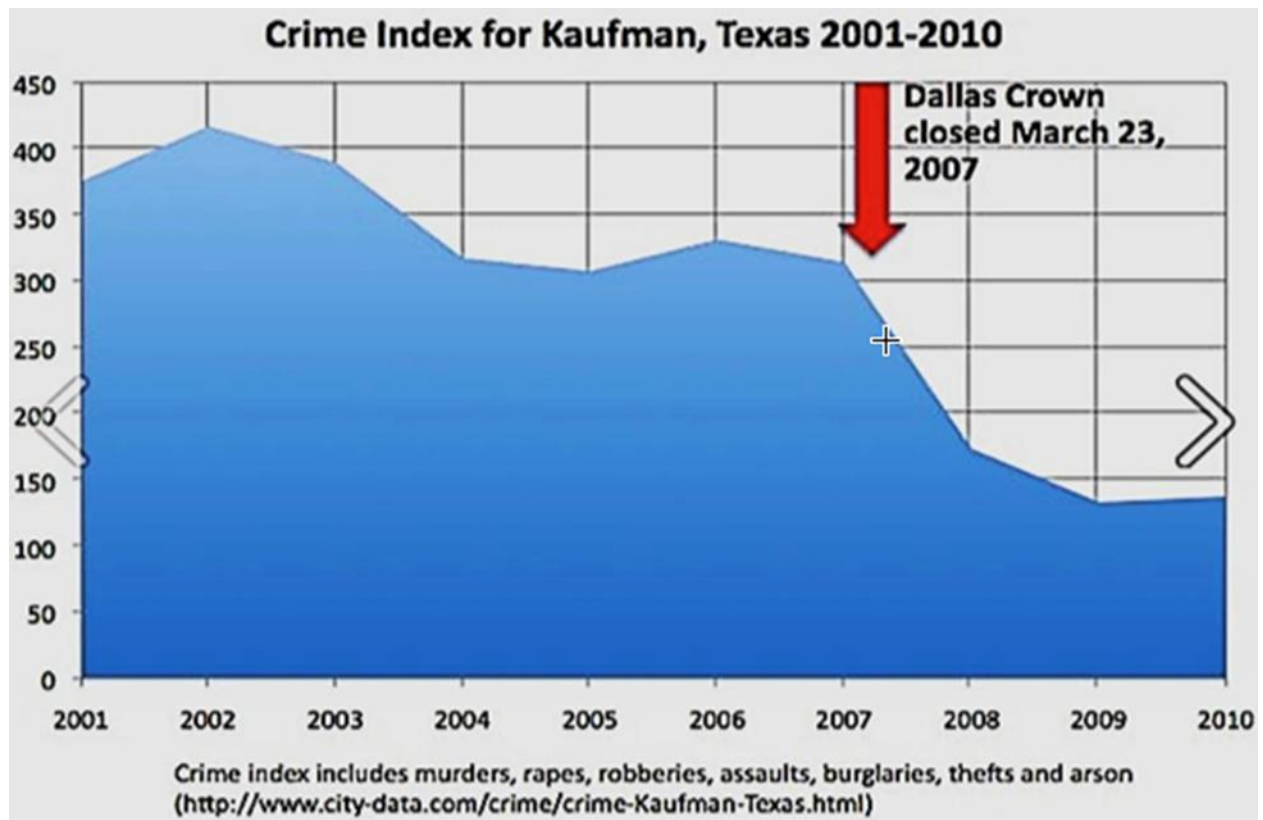
Yours truly,

A handwritten signature in cursive script, appearing to read "P. Bacon", written in black ink on a light gray background.

Paula Bacon

Mayor 2003-07, Kaufman, Texas
617-335-9550

Crime immediately fell in Kaufman after January news that the plant would close in March.



Kaufman Herald, January 23, 1986: "Residents Protest Packing Plant": "Quite frankly, we don't want you here!" says Mayor Harry Holcomb. "We want to be good members of the community," said plant manager Kemp.

Residents protest pack

January 23, 1986

By MARTHA ANDERSON

"Quite frankly, we don't want you here!" This was the reaction of Mayor Harry Holcomb and the sentiment of the Kaufman City Council to the request by the owners of Dallas Crown Packing Company to re-open the Kaufman meat packing plant. Owners Henry Serruys and Jack Kemp faced opposition from the council, City Coordinator Norman Smith and several neighbors of the plant at the Kaufman City Council meeting last Tuesday night.

"That plant has never made the

city a dime and never will. I think if you polled the council all would say they wished the plant would be in another town, but we can't prohibit them from opening; we can just close them down if they don't comply with ordinances and regulations," said Mayor Holcomb.

During a sometimes heated discussion about the reopening of the plant, Serruys and Kemp offered reassurance that they would attempt to meet pre-treatment and waste disposal regulations set by the city and state.

"We have agreed all along to meet the requirements of the city. We want to be good members of the community," said Kemp.

"That plant has been a lousy part of the community in the past and we want to be sure that doesn't happen again," said City Coordinator Norman Smith.

Residents living near the meat packing plant voiced opposition to the reopening, citing examples from past plant operations when residential sewer systems and street were filled with blood and other discharge

cking plan

from the plant. Concern was also expressed about the smell, insects, and noise from the plant.

"How would you like to have blood in front of your house, and have the smell of manure and see flies all around?" said Ed Cave, a resident near the plant.

"We live in the new part of the neighborhood, and for years we were kicked and dragged because of the condition of our houses with no sewer, no streets. Now we have nice homes and want them to stay that way. When that plant was open in

the past the blood would run down the streets and we had to walk through it. With 73 children living in that area, if they get sick from an epidemic of something, the whole town will get it from our kids at school," said one area resident.

City waste water analyst Tag Coolidge told the council and audience that if pre-treatment requirements are met, conditions won't be as bad as in the past.

"If they meet the requirements, it won't be like before. The amount of odor created by wastewater should

be minimized, and they shouldn't be putting blood into the sewer because they can sell it, and every pint of blood they pour down the sewer is lost money," said Coolidge. "If they violate the waste-water ordinances of the city, they can be forced to come into compliance or be closed.

City officials stressed the point that the plant must be allowed to open. "We have been told by the city attorney that the site is correctly zoned for an active plant. Serruys

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★ City

and Kemp have taken possession of the plant as owners, and we are not allowed by law to deprive the men of the right to conduct a business. However, they cannot open until they meet our pretreatment and other requirements, and once open, if they violate ordinances, we can close them down," said Smith.

Kaufman Herald articles: None of the wastewater agreements made by Dallas Crown before it reopened in 1986 would be honored. See violations next page.

Herald

MARY SWANSON DR.
1008 VILLAGE DR.
KAUFMAN, TX 75142

THURSDAY, January 16, 1986

Meat packer to open Owner says plant will meet requirements

By MARTHA ANDERSON

Work is expected to begin this week on preparations for reopening the former Kaufman Meat Packers plant off Hwy 175 in Kaufman, said plant manager Henry Serruys. Scheduled for opening in early March, the plant will be operating under the name Dallas Crown Packing Company for the slaughter of horses for shipment to foreign markets.

Serruys said work will begin this week on preparing the plant to meet pre-treatment requirements required by the city and state. "We will operate in accordance with pre-treatment requirements of the state and city for disposal of waste

through a separate 1500 foot sewer line," said Serruys.

Co-owners of the new company, Central Texas Packing Company and Donar of Belgium purchased the property from former owner A.H. Hammer in late December, said Serruys. Upon opening, the plant expects to slaughter approximately 300 horses per week for shipment to foreign markets, primarily Belgium and Japan.

Horses slaughtered at the plant will be shipped in mostly from out of state, said Serruys. "We don't go on the market to buy 'good' horses. We get surplus horses—those that would be sent to the glue factory or others

not fit for other use," said Serruys.

The animals are slaughtered through the use of a "stun gun", a gun-shaped instrument with a belt-like object which shoots out, killing the animal in a fraction of a second, said Serruys. A USDA inspector will be on site each day to insure that the plant operates under government regulations and the plant will work under the guidance of the humane society, said Serruys.

Serruys said there are approximately 15 "horse operations" operating in the United States, including plants in Palestine, Fort Worth, and Morton, Texas.

City issues strict guidelines for packing plant waste

By MARTHA ANDERSON

In an effort to avoid past problems which have plagued the local sewer system due to waste discharge from former packing plants, the City of Kaufman is seeking stricter pre-treatment requirements prior to the opening of the Dallas Crown Packing plant, said City Coordinator Norman Smith.

"In the past the plant was already in operation at the time of the problem, and the city could only work towards obtaining a satisfactory pre-treatment level. This time, the plant is not yet open, and we won't allow them to open unless they meet the requirements beforehand," said Smith.

The city has informed plant management of several requirements

which must be met before the plant may open. "The plant must construct an individual sewer line running from the plant to a manhole on Grove and Shannon St. The waste will then enter the main sewer line without going near residential lines, preventing the possibility of waste entering the residential sewer system," said Smith.

A pre-treatment facility capable of treating waste to pass waste discharge requirements must also be built by the plant before a permit can be obtained to discharge. "They have been told they must attain pre-treatment quality in accordance with industrial waste requirements before they can commence business," said Smith.

Monitoring of the Ph level and oil

and grease levels will be required, as well as tests for the oxygen level in waste.

"No substance which would impair the normal treatment procedure, such as flesh, hair or entrails will be allowed in the system," said Smith.

In addition, the city has required the plant to enter into a letter of agreement to set up a mutually agreed amount of money in an escrow account at the city depository at the best interest rate possible for use in clearing any forthcoming debts to the city, for use in keeping in alignment with city requirements, and in the event of bankruptcy or foreclosure on the business, said Smith.

ve. The 20 X 38
foot high pole,
1 miles away.

...the
...Crown
...faculties

Dallas Crown in Kaufman, TX: 481 wastewater violations occurred over a period of 19 months (in yellow). The plant would ask for separate jury trials. 458 penalties totaling more than \$916,000 were never paid.

1	Date Collected	Account/Sample Collected	Ammonia as Nitrogen	COD	CRDD	BOD	BOD5	TSS	Oil & Grease	pH	Violations	Citation Issued	Citation Paid	Comments	Case Number
2	1/1/04	253/Effluent Composite	81			2000	850	7.1							
3	1/6/04	253/Effluent Composite	92			860	450	6.6							
4	1/6/04	13/OC Plant Discharge Grab Monthly	710			710	160	8.5	6.6						
5	1/13/04	253/Effluent Composite	79			1600	720	7.2							
6	1/6/04	253/Effluent Composite	47			960	390	6.7							
7	1/20/04	253/Effluent Composite	84			2000	900	7.2							
8	1/23/04	253/Effluent Composite	49			2750	450	7.4	BOD		1 YES (1)	\$ 1,000.00			400-0015-04
9	1/30/04	253/Effluent Composite	15			740	400	7.5							
10	2/3/04	253/Effluent Composite	37			2650	1600	7.3	BOD, TSS		2 YES (1)	\$ 1,000.00			400-0072-04
11	2/3/04	13/OC Plant Discharge Grab Monthly	750			750	170	7.3							
12	2/6/04	253/Effluent Composite	74			2650	890	7.4	BOD		1 YES (1)	\$ 1,000.00			400-0075-04
13	2/10/04	253/Effluent Composite	58			1700	970	7.2							
14	2/13/04	253/Effluent Composite	34			2300	700	7.4	BOD		1 YES (1)	\$ 1,000.00			400-0075-04
15	2/17/04	253/Effluent Composite	62			3150	660	7.4	BOD		1 YES (1)	\$ 1,000.00			00-84-04
16	2/24/04	253/Effluent Composite	79			3000	1300	7.1	BOD		1 YES (1)	\$ 1,000.00			00-85-04
17	2/27/04	253/Effluent Composite	78			2350	1400	6.9	BOD		1 YES (1)	\$ 1,000.00			00-86-04
18	3/2/04	13/OC Plant Discharge Grab Monthly	930			930	180	26	6.6						
19	3/5/04	253/Effluent Composite	84			1400	820	7.1							
20	3/9/04	253/Effluent Composite	130			3350	1200	7.0	BOD		1 YES (1)	\$ 1,000.00			400-0087-04
21	3/12/04	253/Effluent Composite	45			1300	870	6.7							
22	3/16/04	253/Effluent Composite	61			2650	260	7.0	BOD		1				
23	3/19/04	253/Effluent Composite	120			3000	1000	7.1	BOD		1				
24	3/23/04	253/Effluent Composite	130			1900	370	6.5							
25	3/26/04	253/Effluent Composite	150			3000	1100	7.0	BOD		1				
26	3/30/04	253/Effluent Composite	220			2400	1200	6.9	BOD		1				
27	4/2/04	253/Effluent Composite	68			1300	850	7.3							
28	4/6/04	13/OC Plant Discharge Grab Monthly	4000			4000	32	6.8	BOD, TSS		2				
29	4/6/04	253/Effluent Composite	140			1500	1900	70	6.8						
30	4/9/04	253/Effluent Composite	110			1700	1200	1000	7.3						
31	4/13/04	253/Effluent Composite	140			3250	1800	3300	6.9	BOD, TSS	2				
32	4/16/04	253/Effluent Composite	86			1200	990	460	7.1						
33	4/20/04	253/Effluent Composite	170			1600	1300	130	6.6						
34	4/23/04	253/Effluent Composite	180			1600	1200	880	7.1						
35	4/27/04	253/Effluent Composite	75			1700	1400	230	7.0						
36	4/27/04	13/Plant Effluent Composite Daily	72		1400		190	17	6.9						
37	4/28/04	13/Plant Effluent Composite Daily	150		2000		430	16	7.1						
38	4/29/04	13/Plant Effluent Composite Daily						120	7.3						
39	4/30/04	253/Effluent Composite	200			2000	1400	1300	7.2						
40	4/30/04	13/Plant Effluent Composite Daily	200		2000		1300	20	7.2						
41	5/1/04	13/Plant Effluent Composite Daily	230		2500		2050	21	6.7	BOD, TSS	2 YES (2)	\$ 2,000.00			400-0206-04 TSS 400-0208-04 CBOD
42	5/4/04	13/OC Plant Discharge Grab Monthly	1100			1100	25	6.6							
43	5/4/04	253/Effluent Composite	120			7350	1400	6350	6.8	BOD, TSS	2				
44	5/4/04	13/Plant Effluent Composite Daily	130		7650		7250	20	6.8	CBOD, TSS	2 YES (2)	\$ 2,000.00			400-0207-04 CBOD 400-0208-04 TSS
45	5/5/04	13/Plant Effluent Composite Daily	58		370		170	12	6.9						
46	5/6/04	13/Plant Effluent Composite Daily	150		970		560	240	7.1						
47	5/7/04	13/Plant Effluent Composite Daily	100		1400		960	8.4	7.2						
48	5/8/04	13/Plant Effluent Composite Daily	170		4800		8700	180	7.0	CBOD, TSS	2 YES (2)	\$ 2,000.00			400-0210-04 TSS 400-0209-04 CBOD
49	5/11/04	13/Plant Effluent Composite Daily	230		7350		9250	54	6.7	CBOD, TSS	2 YES (2)	\$ 2,000.00			400-0211-04 CBOD 400-0212-04 TSS
50	5/12/04	13/Plant Effluent Composite Daily	120		1400		370	24	6.9						
51	5/13/04	13/Plant Effluent Composite Daily	79		820		1000	16	7.2						
52											Note: Total violations this sheet =	27			
53															
54	Date Collected	Account/Sample Collected	Ammonia as Nitrogen	COD	CRDD	BOD	BOD5	TSS	Oil & Grease	pH	Violations	Citation Issued	Citation Paid	Comments	Case Number
55	5/14/04	13/Plant Effluent Composite Daily	150		1300		3600	4350	350	7.1	BOD, TSS	2 YES (2)	\$ 2,000.00		400-0213-04 BOD 400-0214-04 TSS
56	5/15/04	13/Plant Effluent Composite Daily	180					850	12	6.8					
57	5/18/04	13/Plant Effluent Composite Daily	230			8000	390	5.9	BOD, TSS		2 YES (2)	\$ 2,000.00			400-0215-04 BOD 400-0216-04 TSS
58	5/19/04	13/Plant Effluent Composite Daily	79		600		94	7.9	6.9						
59	5/20/04	13/Plant Effluent Composite Daily	370			8000	8500	120	7.0	BOD, TSS	2 YES (2)	\$ 2,000.00			400-0227-04 BOD 400-0289-04 TSS
60	5/21/04	13/Plant Effluent Composite Daily	270			2550	230	7.7	6.9	BOD	1 YES (1)	\$ 1,000.00			400-0228-04
61	5/22/04	13/Plant Effluent Composite Daily	270			1600	1100	8.5	7.1						
62	5/25/04	13/Plant Effluent Composite Daily	300			5550	3760	22	6.1	BOD, TSS	2 YES (2)	\$ 2,000.00			400-0291-04 BOD 400-0293-04 TSS
63	5/26/04	13/Plant Effluent Composite Daily	140			140	140	140	140						
64	5/27/04	13/Plant Effluent Composite Daily	71			370	67	160	7.0						
65	5/28/04	13/Plant Effluent Composite Daily	140			1700	330	11	6.8						
66	5/29/04	13/Plant Effluent Composite Daily	170			3000	1800	6.4	6.9	BOD, TSS	2 YES (2)	\$ 2,000.00			400-0281-04 TSS 400-0280-04 BOD
67	6/1/04	13/Plant Effluent Composite Daily	180			2350	1200	81	6.8	BOD	1 YES (1)	\$ 1,000.00			400-0292-04
68	6/1/04	13/OC Plant Discharge Grab Monthly	3900			3900	4250	86	6.6	BOD, TSS	2				
69	6/2/04	13/Plant Effluent Composite Daily	150			1500	87	7.9	7.0						
70	6/3/04	13/Plant Effluent Composite Daily	240			3700	2600	260	6.9	BOD, TSS	2 YES (2)	\$ 2,000.00			400-0306-04 TSS 400-0307-04 BOD
71	6/4/04	13/Plant Effluent Composite Daily	150			3350	370	12	7.0	BOD	1 YES (1)	\$ 1,000.00			400-0305-04
72	6/5/04	13/Plant Effluent Composite Daily	120			1600	880	52	7.2						
73	6/6/04	13/Plant Effluent Composite Daily	230			1400	970	31	7.2						
74	6/9/04	13/Plant Effluent Composite Daily	200			9448	660	25	6.9	BOD	1 YES (1)				400-0343-04
75	6/10/04	13/Plant Effluent Composite Daily	100			1300	400	54	6.9						
76	6/11/04	13/Plant Effluent Composite Daily	170			2650	230	20	7.0	BOD	1 YES (1)	\$ 1,000.00			400-0310-04
77	6/12/04	13/Plant Effluent Composite Daily	120			140	180	100	7.3	TSS	1 YES (1)	\$ 1,000.00			400-0315-04
78	6/15/04	13/Plant Effluent Composite Daily	35			880	240	25	7.6						
79	6/16/04	13/Plant Effluent Composite Daily	170			16000	1800	31	7.4	BOD, TSS	2 YES (2)				400-0341-04 BOD 400-0342-04 TSS
80	6/17/04	13/Plant Effluent Composite Daily	150			11000	720	160	6.5	BOD	1 YES (1)				400-0340-04
81	6/18/04	13/Plant Effluent Composite Daily	250			13000	2500	15	7.7	BOD, TSS	2 YES (2)				400-0330-04 BOD 400-0331-04 TSS
82	6/19/04	13/Plant Effluent Composite Daily	150			2000	1500	11	7.6						
83	6/22/04	13/Plant Effluent Composite Daily	200			5650	3000	97	7.4	BOD	1 YES (1)				400-0332-04
84	6/23/04	13/Plant Effluent Composite Daily	230			35000	1400	38	7.5	BOD	1 YES (1)				400-0336-04
85	6/24/04	13/Plant Effluent Composite Daily	200			33000	1700	87	7.3	BOD	1 YES (1)				400-0333-04
86	6/25/04	13/Plant Effluent Composite Daily	270			2800	2800	55	7.5	BOD, TSS	2 YES (2)				400-0337-04
87	6/26/04	13/Plant Effluent Composite Daily	100			670	770	25	7.1						
88	6/29/04	13/Plant Effluent Composite Daily	100			1600	490	48	7.0						
89	6/30/04	13/Plant Effluent Composite Daily	120			18000	2250	79	7.1	BOD, TSS	2 YES (2)				400-0334-04 BOD 400-0335-04 TSS
90	7/1/04	13/Plant Effluent Composite Daily	180			1400	1660	48	6.8	TSS	1 YES (1)				400-0338-04
91	7/2/04	13/Plant Effluent Composite Daily	120			8500	800	45.6	6.9	BOD	1 YES (1)				04-0008754
92	7/3/04	13/Plant Effluent Composite Daily	98			430	470	16	7.6						
93	7/6/04	13/Plant Effluent Composite Daily	180			940	480	45.9	7.3						
94	7/6/04	13/OC Plant Discharge Grab Monthly	1000			1000	64	45.9	7.2						
95	7/7/04	13/Plant Effluent Composite Daily	100			3550	1400	81	6.8	BOD	1 YES (1)				04-0008834
96	7/9/04	13/Plant Effluent Composite Daily	150			8250	270	45.7	7.1	BOD	1 YES (1)				04-0009040
97	7/8/04	13/Plant Effluent Composite Daily	130			1200	270	58	5.9						
98	7/10/04	13/Plant Effluent Composite Daily	170			4000	63	7.4	BOD		1 YES (1)				04-0009048
99	7/13/04	13/Plant Effluent Composite Daily	180			1600	150	92	6.3						
100	7/14/04	13/Plant Effluent Composite Daily	170			3600	1700	13	7.7	BOD, TSS	2 YES (1)				04-0009096
101	7/15/04	13/Plant Effluent Composite Daily	20			7400	120	5.8	7.6	BOD	1 YES (1)				04-0009277
102	7/16/04	13/Plant Effluent Composite Daily	38			1200	340	34	6.9						
103	7/1														

Date Collected	Account/Sample Collected	Ammonia as Nitrogen	COD	CRDD	BOD	BOD5	TSS	Oil & Grease	pH	Violations	Citation Issued	Citation Paid	Comments	Case Number
107														
108	7/2/04	13Plant Effluent Composite Daily	32		520		94	+8.2	7.3					
109	7/2/04	13Plant Effluent Composite Daily	39		540		120	+8.2	6.7					
110	7/2/04	13Plant Effluent Composite Daily	75		920		530	+8.2	7.4					
111	7/2/04	13Plant Effluent Composite Daily	26		150		49	+5.9	7.7					
112	7/2/04	13Plant Effluent Composite Daily	86		1900		470	22	7.5	BOD	1	YES (1)		04-009777
113	7/2/04	13Plant Effluent Composite Daily	26		2100		150	+8.0	7.9	BOD	1	YES (1)		04-009851
114	7/2/04	13Plant Effluent Composite Daily	36		830		430	11	6.4					
115	7/3/04	13Plant Effluent Composite Daily	18		360		270		6.5					
116	7/3/04	13Plant Effluent Composite Daily	44		260		180	+5.5	7.2					
117	8/3/04	13Plant Effluent Composite Daily	40		150		92	100	6.5					
118	8/3/04	13IOC Plant Discharge Grab Monthly			5400		1200	90	6.7	BOD	1	YES (1)		04-001046
119	8/4/04	13Plant Effluent Composite Daily	160		9200		1200	+8.1	7.0	BOD	1	YES (1)		04-001046
120	8/5/04	13Plant Effluent Composite Daily	190		6800		930	22	6.8	BOD	1	YES (1)		04-0010294
121	8/6/04	13Plant Effluent Composite Daily	230		2300		2300	110	6.8	BOD, TSS	2	YES (1)		04-0010296 BOD/TSS?
122	8/7/04	13Plant Effluent Composite Daily	240		3400		950	140	7.8					
123	8/14/04	13Plant Effluent Composite Daily	61		990		165	14	6.9					
124	8/17/04	13Plant Effluent Composite Daily	110		2000		120	16	6.8	BOD	1	YES (1)		04-0010706
125	8/18/04	13Plant Effluent Composite Daily	30		2000		83	52	6.7					
126	8/19/04	13Plant Effluent Composite Daily	93		2650		340	270	6.2	BOD	1	YES (1)		04-0010817
127	8/20/04	13Plant Effluent Composite Daily	62		990		660	22	6.3					
128	8/24/04	13Plant Effluent Composite Daily	26000		16000		240			BOD	1			
129	8/24/04	13Plant Effluent Composite Daily	2100		1400		140							
130	9/10/04	13Plant Effluent Composite Daily	1800		4200		740			BOD	1			
131	9/11/04	13Plant Effluent Composite Daily	1700		940		110							
132	9/12/04	13Plant Effluent Composite Daily	2000		1100		110							
133	9/14/04	13Plant Effluent Composite Daily	2400		1400		430							
134	9/15/04	13Plant Effluent Composite Daily	1300		790		160							
135	9/16/04	13Plant Effluent Composite Daily	2600		2000		930							
136	9/17/04	13Plant Effluent Composite Daily	3400		2550		1400			BOD	1			
137	9/18/04	13Plant Effluent Composite Daily	1100		450		170							
138	9/19/04	13Plant Effluent Composite Daily	820		1200		170							
139	9/21/04	13Plant Effluent Composite Daily	2000		2000		240							
140	9/22/04	13Plant Effluent Composite Daily	2000		1300		410							
141	9/23/04	13Plant Effluent Composite Daily	610		440		87							
142	9/24/04	13Plant Effluent Composite Daily	1400		1200		100							
143	9/25/04	13Plant Effluent Composite Daily	960		600		74							
144	9/26/04	13Plant Effluent Composite Daily	320		270		32							
145	9/28/04	13Plant Effluent Composite Daily	1500		*		82							
146	9/28/04	13Plant Effluent Composite Daily			930									
147	9/29/04	13Plant Effluent Composite Daily	910		660		330							
148	9/30/04	13Plant Effluent Composite Daily	810		640		24							
149	10/1/04	13Plant Effluent Composite Daily	2000		1100		120							
150	11/18/04												Letter to begin daily testing	
151	11/23/04	No test submitted								BOD, TSS, pH	3		2nd letter UIC	
152	11/24/04	No test submitted								BOD, TSS, pH	3			
153	11/25/04	No test submitted								BOD, TSS, pH	3			
154	11/26/04	No test submitted								BOD, TSS, pH	3			
155	11/29/04	No test submitted								BOD, TSS, pH	3			
156										Note: Total violations this sheet =	15			
157										Subtotal violations =	75			
Date Collected	Account/Sample Collected	Ammonia as Nitrogen	COD	CRDD	BOD	BOD5	TSS	Oil & Grease	pH	Violations	Citation Issued	Citation Paid	Comments	Case Number
158														
159														
160	11/30/04	No test submitted								BOD, TSS, pH	3			
161	12/1/04	No test submitted								BOD, TSS, pH	3			
162	12/2/04	No test submitted								BOD, TSS, pH	3			
163	12/3/04	Ceres Plant Effluent	1560		721		400			pH, TSS, Lab	2			
164	12/6/04	No test submitted								BOD, TSS, pH	3			
165	12/7/04	Ceres Plant Effluent	4280		1550		2100			pH, TSS, Lab	3		TSS violation plus	
166	12/8/04	No test submitted								BOD, TSS, pH	3			
167	12/9/04	No test submitted								BOD, TSS, pH	3			
168	12/10/04	Ceres Plant Effluent	6250		3300		2620			pH, TSS, Lab	4		BOD and TSS violations plus	
169	12/13/04	No test submitted								BOD, TSS, pH	3			
170	12/14/04	Ceres Plant Effluent	4270		1220		1660			pH, TSS, Lab	2			
171	12/15/04	No test submitted								BOD, TSS, pH	3			
172	12/16/04	No test submitted								BOD, TSS, pH	3			
173	12/17/04	Ceres Plant Effluent	3370		1570		1040			pH, TSS, Lab	2			
174	12/20/04	No test submitted								BOD, TSS, pH	3			
175	12/21/04	Ceres Plant Effluent	3060		1130		600			pH, TSS, Lab	2			
176	12/22/04	No test submitted								BOD, TSS, pH	3			
177	12/23/04	Ceres Plant Effluent	925		421		216			pH, TSS, Lab	2			
178	12/24/04	No test submitted								BOD, TSS, pH	3			
179	12/27/04	No test submitted								BOD, TSS, pH	3			
180	12/28/04	Ceres Plant Effluent	633		211		206			pH, TSS, Lab	2			
181	12/29/04	No test submitted								BOD, TSS, pH	3			
182	12/30/04	Ceres Plant Effluent	940		430		144			pH, TSS, Lab	2			
183	12/31/04	No test submitted								BOD, TSS, pH	3			
184	1/3/05	No test submitted								BOD, TSS, pH	3			
185	1/4/05	Ceres Plant Effluent	640		234		100			pH, TSS, Lab	2			
186	1/5/05	No test submitted								BOD, TSS, pH	3			
187	1/6/05	No test submitted								BOD, TSS, pH	3			
188	1/7/05	Ceres Plant Effluent	893		270		150			pH, TSS, Lab	2			
189	1/10/05	No test submitted								BOD, TSS, pH	3			
190	1/11/05	Ceres Plant Effluent	1300		504		420			pH, TSS, Lab	2			
191	1/12/05	No test submitted								BOD, TSS, pH	3			
192	1/13/05	No test submitted								BOD, TSS, pH	3			
193	1/14/05	Ceres Plant Effluent	683		270		44			pH, TSS, Lab	2			
194	1/17/05	No test submitted								BOD, TSS, pH	3			
195	1/18/05	Ceres Plant Effluent	1280		892		508			pH, TSS, Lab	2			
196	1/19/05	No test submitted								BOD, TSS, pH	3			
197	1/20/05	No test submitted								BOD, TSS, pH	3			
198	1/21/05	Ceres Plant Effluent	925		435		46			pH, TSS, Lab	2			
199	1/24/05	No test submitted								BOD, TSS, pH	3			
200	1/25/05	Ceres Plant Effluent	1110		341		220			pH, TSS, Lab	2			
201	1/26/05	No test submitted								BOD, TSS, pH	3			
202	1/27/05	No test submitted								BOD, TSS, pH	3			
203	1/28/05	Ceres Plant Effluent	880		274		44			pH, TSS, Lab	2			
204	1/31/05	No test submitted								BOD, TSS, pH	3			
205	2/1/05	Ceres Plant Effluent	855		189		30			pH, TSS, Lab	2			
206	2/2/05	No test submitted								BOD, TSS, pH	3			
207										Note: Total violations this sheet =	126			
208										Subtotal violations =	204			

	Date	Account/Sample Collected	Ammonia as Nitrogen	CDD	CBDQ	SD	SDQS	TSS	Oil & Grease	all	Violations	Citation Issued	Citation Paid	Comments	Case Number
209	2/3/05	No test submitted									8000, 100, Ph	3			
210	2/3/05	Carles Plant Effluent		820		334		545			Ph, Seven Laps	2			
211	2/7/05	No test submitted									8000, 100, Ph	3			
212	2/8/05	Carles Plant Effluent		555		321		54			Ph, Seven Laps	2			
213	2/9/05	No test submitted									8000, 100, Ph	3			
214	2/9/05	No test submitted									8000, 100, Ph	3			
215	2/10/05	No test submitted									8000, 100, Ph	3			
216	2/11/05	Carles Plant Effluent		570		208		40			Ph, Seven Laps	2			
217	2/14/05	No test submitted									8000, 100, Ph	3			
218	2/15/05	Carles Plant Effluent		631		302		48			Ph, Seven Laps	2			
219	2/16/05	No test submitted									8000, 100, Ph	3			
220	2/17/05	No test submitted									8000, 100, Ph	3			
221	2/18/05	Carles Plant Effluent		552		203		52			Ph, Seven Laps	2			
222	2/21/05	No test submitted									8000, 100, Ph	3			
223	2/22/05	No test submitted									8000, 100, Ph	3			
224	2/23/05	No test submitted									8000, 100, Ph	3			
225	2/24/05	No test submitted									8000, 100, Ph	3			
226	2/25/05	Carles Plant Effluent		585		758		188			Ph, Seven Laps	2			
227	2/28/05	No test submitted									8000, 100, Ph	3			
228	3/1/05	Carles Plant Effluent		754		287		48			Ph, Seven Laps	2			
229	3/2/05	No test submitted									8000, 100, Ph	3			
230	3/3/05	No test submitted									8000, 100, Ph	3			
231	3/4/05	Carles Plant Effluent		933		357		544			Ph, Seven Laps	2			
232	3/7/05	No test submitted									8000, 100, Ph	3			
233	3/8/05	Carles Plant Effluent		637		310		48			Ph, Seven Laps	2			
234	3/9/05	No test submitted									8000, 100, Ph	3			
235	3/10/05	No test submitted									8000, 100, Ph	3			
236	3/11/05	Carles Plant Effluent		601		204		574			Ph, Seven Laps	2			
237	3/14/05	No test submitted									8000, 100, Ph	3			
238	3/15/05	No test submitted									8000, 100, Ph	3			
239	3/16/05	No test submitted									8000, 100, Ph	3			
240	3/17/05	No test submitted									8000, 100, Ph	3			
241	3/18/05	No test submitted									8000, 100, Ph	3			
242	3/21/05	No test submitted									8000, 100, Ph	3			
243	3/22/05	Carles Plant Effluent		1190		388		328			Ph, Seven Laps	2			
244	3/23/05	No test submitted									8000, 100, Ph	3			
245	3/24/05	No test submitted									8000, 100, Ph	3			
246	3/25/05	Carles Plant Effluent		748		318		34			Ph, Seven Laps	2			
247	3/28/05	No test submitted									8000, 100, Ph	3			
248	3/29/05	No test submitted									8000, 100, Ph	3			
249	3/30/05	No test submitted									8000, 100, Ph	3			
250	3/31/05	No test submitted									8000, 100, Ph	3			
251	4/1/05	Carles Plant Effluent		540		808		530			8000, 100, Ph	3			
252	4/4/05	No test submitted									8000, 100, Ph	3			
253	4/5/05	Carles Plant Effluent		826		353		172			8000, 100, Ph	3			
254	4/6/05	No test submitted									8000, 100, Ph	3			
255	4/7/05	No test submitted									8000, 100, Ph	3			
256	4/8/05	No test submitted									8000, 100, Ph	3			
257	4/11/05	No test submitted									8000, 100, Ph	3			
258	4/12/05	No test submitted									8000, 100, Ph	3			
259	4/13/05	No test submitted									8000, 100, Ph	3			
260															
261											Note: Total violations this sheet =	138			
											Subtotal violations =	357			
262	Date Collected	Account/Sample Collected	Ammonia as Nitrogen	CDD	CBDQ	SD	SDQS	TSS	Oil & Grease	all	Violations	Citation Issued	Citation Paid	Comments	Case Number
263	4/14/05	No test submitted									8000, 100, Ph	3			
264	4/15/05	Carles Plant Effluent		5320		392		280			8000, 100, Ph	3			
265	4/18/05	No test submitted									8000, 100, Ph	3			
266	4/19/05	Carles Plant Effluent		858		285		35			8000, 100, Ph	3			
267	4/20/05	No test submitted									8000, 100, Ph	3			
268	4/21/05	No test submitted									8000, 100, Ph	3			
269	4/22/05	Carles Plant Effluent		720		347		501			8000, 100, Ph	3			
270	4/25/05	No test submitted									8000, 100, Ph	3			
271	4/26/05	No test submitted									8000, 100, Ph	3			
272	4/27/05	No test submitted									8000, 100, Ph	3			
273	4/28/05	No test submitted									8000, 100, Ph	3			
274	4/29/05	No test submitted									8000, 100, Ph	3			
275	5/2/05	No test submitted									8000, 100, Ph	3			
276	5/3/05	Carles Plant Effluent		838		513		38			8000, 100, Ph	3			
277	5/4/05	No test submitted									8000, 100, Ph	3			
278	5/5/05	No test submitted									8000, 100, Ph	3			
279	5/10/05	Carles Plant Effluent		848		345		533			8000, 100, Ph	3			
280	5/11/05	No test submitted									8000, 100, Ph	3			
281	5/12/05	Carles Plant Effluent		5060		684		178			8000, 100, Ph	3			
282	5/13/05	No test submitted									8000, 100, Ph	3			
283	5/12/05	No test submitted									8000, 100, Ph	3			
284	5/13/05	Carles Plant Effluent		905		303		38			8000, 100, Ph	3			
285	5/16/05	No test submitted									8000, 100, Ph	3			
286	5/17/05	Carles Plant Effluent		817		434		523			8000, 100, Ph	3			
287	5/18/05	No test submitted									8000, 100, Ph	3			
288	5/19/05	No test submitted									8000, 100, Ph	3			
289	5/20/05	Carles Plant Effluent		995		381		522			8000, 100, Ph	3			
290	5/21/05	No test submitted									8000, 100, Ph	3			
291	5/24/05	Carles Plant Effluent		5200		674		504			8000, 100, Ph	3			
292	5/25/05	No test submitted									8000, 100, Ph	3			
293	5/26/05	No test submitted									8000, 100, Ph	3			
294	5/27/05	Carles Plant Effluent		925		483		540			8000, 100, Ph	3			
295	5/30/05	No test submitted									8000, 100, Ph	3			
296	5/31/05	No test submitted									8000, 100, Ph	3			
297	6/1/05	No test submitted									8000, 100, Ph	3			
298	6/2/05	No test submitted									8000, 100, Ph	3			
299	6/3/05	No test submitted									8000, 100, Ph	3			
300	6/8/05	No test submitted									8000, 100, Ph	3			
301	6/7/05	Carles Plant Effluent		888		258		520			8000, 100, Ph	3			
302	6/9/05	Carles Plant Effluent		9710		484		540			8000, 100, Ph	3			
303	6/14/05	Carles Plant Effluent		5370		515		45							
304	6/17/05	Carles Plant Effluent		5370		540		520						OC Letter Sampling	
305	6/21/05	Carles Plant Effluent		2000		674		290		4.8 Ph					
306	6/23/05	Carles Plant Effluent		5840		750		33		4.9 Ph					
307	6/28/05	Carles Plant Effluent		5870		780		178		4.9 Ph					
308	7/1/05	Carles Plant Effluent		5880		880		58		3.7 Ph					
309	7/6/05	Open		5800		89		810		4.8 Ph					550394
310	7/7/05	Open		990		620		540		4.8 Ph					550414
311											Note: Total violations this sheet =	122			
312											Subtotal violations =	465			

Date	Account/Sample Collected	Ammonia as Nitrogen	COD	CRDD	BOD	SCOD	TSS	Oil & Grease	pH	Violations	Citation Issued	Citation Paid	Comments	Case Number
313	7/6/05	Tarom	2100		130		470	3.3	Ph		1 YES (1)			150389
314	7/12/05	Tarom	1500		1100		500	6.0						
315	7/12/05	Carlos Plant Effluent	2300		1220		880	3.4	Ph		1			
316	7/13/05	Tarom	1700		900		190	4.6	Ph		1 YES (1)			
317	7/14/05	Tarom	720		240		62	5.1	Ph		1 YES (1)			
318	7/15/05	Carlos Plant Effluent	1500		540		280	5.3						
319	7/15/05	Tarom	1400		420		240	6.0						
320	7/19/05	Tarom	1400		630		200	7.6						
321	7/19/05	Carlos Plant Effluent	1220		774		100	7.5						
322	7/20/05	Tarom	1300		930		700	5.9						
323	7/21/05	Tarom	1800		980		90	6.9						
324	7/22/05	Tarom	1600		240		260	5.3	Ph		1 YES (1)			
325	7/22/05	Carlos Plant Effluent	1530		700		290	4.9						
326	7/26/05	Tarom	1900		*		1000	6.5						
327	7/26/05	Carlos Plant Effluent	3000		1630		1170	6.1						
328	7/27/05	Tarom	2200		3050		1950	6.5	SCOD, TSS		2 YES (1)			
329	7/28/05	Tarom	2300		1500		100	5.9						
330	7/28/05	Carlos Plant Effluent	1480		835		112	6.4						
331	7/29/05	Tarom	1600		710		110	6.4						
332	7/29/05	Carlos Plant Effluent	1450		835		112	6.4						
333	8/2/05	Tarom	1700		1600		390	6.6						
334	8/2/05	Carlos Plant Effluent	1950		1220		530	6.5						
335	8/3/05	Tarom	2200		170		120	7.9						
336	8/4/05	Tarom	2300		1000		775	6.2						
337	8/5/05	Tarom	2700		1200		190	7.0						
338	8/5/05	Carlos Plant Effluent	2750		1620		390	7.0						
339	8/9/05	Tarom	1400		580		160	7.1						
340	8/9/05	Carlos Plant Effluent	1540		748		200	6.7						
341	8/10/05	Tarom	1200		900		180	6.9						
342	8/11/05	Tarom	2400		1100		1200	6.8						
343	8/12/05	Tarom	1300		570		52	6.8						
344	8/12/05	Carlos Plant Effluent	1220		788		60	6.4						
345	8/15/05	Tarom (No Flow)												
346	8/16/05	Tarom	1600		880		300	4.1	Ph		1 YES (1)			
347	8/17/05	Tarom	2100		940		150	4.2	Ph		1 YES (1)			
348	8/18/05	Tarom	2400		1000		120	5.8						
349	8/19/05	Tarom	1300		520		180	6.8						
350	8/20/05	Tarom	2000		900		1200	6.9						
351	8/22/05	Tarom (No Flow)												
352	8/23/05	Tarom	1500		770		290	6.4						
353	8/24/05	Tarom	2300		940		480	6.0						
354	8/25/05	Tarom	2700		1600		440	5.8						
355	8/26/05	Tarom	1800		890		300	5.8						
356	8/26/05	Carlos Plant Effluent	1610		1110		680	5.7						
357	8/27/05	Tarom	2200		1000		190	5.1	Ph		1 YES (1)			
358	8/30/05	Tarom	1600		600		620	6.3						
359														
360														
361														
Note: Total violations this sheet = 10														
Subtotal violations = 675														
Date	Account/Sample Collected	Ammonia as Nitrogen	COD	CRDD	BOD	SCOD	TSS	Oil & Grease	pH	Violations	Citation Issued	Citation Paid	Comments	Case Number
362	8/30/05	Carlos Plant Effluent	1120		770		640	6.4						
363	9/1/05	Tarom	2200		1100		730	5.2	Ph		1 YES (1)			
364	9/1/05	Tarom						4.8						
365	9/2/05	Carlos Plant Effluent	2820		1680		1240	3.9						
366	9/2/05	Tarom	2500		990		1100	4.1	Ph		1 YES (1)			
367	9/3/05	Tarom	3200		3750		3400	6.8	SCOD, TSS		2 YES (1)			
368	9/6/05	Tarom (No Flow)												
369	9/7/05	Tarom	3800		1700		2450	5.8	TSS		1 YES (1)			
370	9/7/05	Tarom	2800		1300		230	6.5						
371	9/8/05	Tarom	2500		1600		610	6.9						
372	9/10/05	Tarom	3700		140		840	6.7						
373	9/14/05	Tarom	3000		1400		1000	6.1						
374	9/15/05	Tarom	2100		850		380	6.8						
375	9/16/05	Tarom	1700		1700		2000	6.1	TSS		1 YES (1)			
376														
377														
NOTE: All Dallas Crown violations are shaded.														
BOD parameters are 2000 maximum														
TSS parameters are 1500 maximum														
Ph parameters are 5.5 to 9.5														
Note: Total violations this sheet = 6														
Subtotal violations = 481														
Total violations = 481														

In 2004, Dallas Crown paid \$5 in federal income taxes on \$12 million+ in income. Over a 5 year period, their tax “bracket” was 1/3 of 1%.

Analysis showed they sell to themselves at a loss so profits only surface overseas.

U.S. Corporation Income Tax Return		OMB No. 1545-0042	
Form 1120 U.S. Corporation Income Tax Return		For calendar year 2004 or tax year beginning 07/01, 2004, ending 06/30/2005	
See separate instructions.		2004	
A Check for: <input type="checkbox"/> (Consolidated return) (attach Form 990) <input type="checkbox"/> Personal holding co. (attach Schedule M-1) <input type="checkbox"/> Personal service corp. (see instructions) <input type="checkbox"/> Schedule M-1 required (attach Schedule M-1)		Use <input type="checkbox"/> IRS label <input type="checkbox"/> Other: write, print or type	
Name DALLAS CROWN, INC. Number, street, and room or suite no. If a P.O. box, see page 7 of instructions 2003 W. FAIR STREET City or town, state, and ZIP code KAUFMAN, TX 75142-1858		Employer identification number [REDACTED] Date incorporated 09/13/1994 Initial filing date (see page 9 of instructions) 882028	
E Check for: <input type="checkbox"/> (1) Initial return <input type="checkbox"/> (2) First return <input type="checkbox"/> (3) Name change <input type="checkbox"/> (4) Address change		12007611	
1a Gross receipts or sales 12007611		1b Less returns and allowances	
2 Cost of goods sold (Schedule A, line 8)		3 Gross profit. Subtract line 2 from line 1a.	
4 Dividends (Schedule C, line 19)		5 Interest	
6 Gross rents		7 Gross royalties	
8 Capital gain net income (attach Schedule D (Form 1120))		9 Net gain or (loss) from Form 4797, Part II, line 18 (attach Form 4797)	
10 Other income (see page 9 of instructions; attach schedule)		11 Total income. Add lines 3 through 10.	
12 Compensation of officers (Schedule E, line 4)		13 Salaries and wages (less employment credits)	
14 Repairs and maintenance		15 Bad debts	
16 Rents		17 Taxes and licenses	
18 Interest		19 Charitable contributions (see page 11 of instructions for 10% limitation)	
20 Depreciation (attach Form 4562)		21a Less depreciation claimed on Schedule A and elsewhere on return	
22 Depletion		23 Advertising	
24 Pension, profit-sharing, etc., plans		25 Employee benefit programs	
26 Other deductions (attach schedule)		27 Total deductions. Add lines 12 through 26.	
28 Taxable income before net operating loss deduction and special deductions. Subtract line 27 from line 11.		29a Less: a Net operating loss (NOL) deduction (see page 13 of instructions)	
b Special deductions (Schedule C, line 20)		29c	
30 Taxable income. Subtract line 29c from line 28.		31 Total tax (Schedule J, line 11)	
32a Payments: a 2003 overpayment credited to 2004		32b 2004 estimated tax payments	
c Less 2004 refund applied for on Form 4466		d Balance	
e Tax deposited with Form 7004		f Credit for tax paid on undistributed capital gains (attach Form 2439)	
g Credit for Federal tax on fuels (attach Form 4136). See instructions.		32h	
33 Estimated tax penalty (see page 14 of instructions). Check if Form 2220 is attached.		34 Tax due. If line 32h is smaller than the total of lines 31 and 33, enter amount owed.	
35 Overpayment. If line 32h is larger than the total of lines 31 and 33, enter amount overpaid.		36 Enter amount of line 35 you want credited to 2005 estimated tax. Refunded	
Sign here Under penalty of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.		May the IRS discuss this return with the preparer on this date? (see instructions) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Preparer's signature [Signature]		Date 09/15/05	
Preparer's name (if yours is not on this return) MAURICE B CLARK CPA PC		Preparer's SSN or PIN [REDACTED]	
Address and ZIP code 808 W MAIN STREET GUN BARREL CITY TX 75150		Phone no. (803) 887-7777	

Forensic Accountant Income and Analysis for Dallas Crown: “it seems to us that this foreign owned US operation is reaping the benefits of the privilege of operating in this country and receiving our numerous governmental services without paying their fair share of taxes. In other words, the American taxpayer is subsidizing this horse slaughter operation. From 2000 through 2004, Dallas Crown, Inc. paid a total of \$149,888 in federal income taxes on \$48,621,155 in gross sales, or .3% of their gross sales.”

JOHN S. RAINEY

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PAGER: 1-800-587-9844

MEMO TO: Christopher J. Heyde, Deputy Legislative Director, Society for Animal Protective Legislation
FROM: John S. Rainey
SUBJECT: Kaufman, Texas Horse Slaughter House's Lack of Profitability
DATE: July 14, 2006

We have compiled a spreadsheet detailing federal income tax, income and deductions for Dallas Crown, Inc., a foreign owned horse slaughter house located in Kaufman, Texas, for the tax years 2000 through 2004. The federal income tax returns from which the information on this spreadsheet was obtained were supplied to us by you. For the five year period, the slaughter house had a total net income before tax of \$497,847 on gross sales over the period of \$48,621,155, or an average annual return of 1% net income before tax to gross sales.

It is our understanding that the annual cost to the USDA for the inspection of the three foreign owned horse slaughter houses in the United States is approximately \$5 million. In order to circumvent a temporary ban enacted by Congress in 2005, these slaughter houses offered to pay the cost of inspection so that they could continue to operate. In that case, assuming the correctness of our numbers, we can reasonably project that Dallas Crown, Inc. would be operating at a tremendous deficit in 2006 after payment of their 1/3 share of this cost, or any appreciable amount of the cost allocated to them. We wonder why a company would bother to conduct business for the dismal return this company has shown in years past, and for the significant loss it will surely incur in 2006.

We have produced an estimate of the financial results if this company had made payment of the annual cost of inspection in the years for which we have tax information (2000 – 2004), rather than such inspection costs being subsidized by the American taxpayer. The total estimated net loss for the five year period would have exceeded \$7,800,000.

Although it is a common and appropriate practice to allocate income and expenses among members of controlled groups of corporations, foreign and domestic, it seems to us that this foreign owned US operation is reaping the benefits of the privilege of operating in this country and receiving our numerous governmental services without paying their fair share of taxes. In other words, the American taxpayer is subsidizing this horse slaughter operation. From 2000 through 2004, Dallas Crown, Inc. paid a total of \$149,888 in federal income taxes on \$48,621,155 in gross sales, or .3% of their gross sales.

Allocation of income and expenses among controlled groups of corporations, foreign and domestic, must reflect economic reality and be based upon arms length transactions in order to be deemed appropriate under the United States Internal Revenue Code. We are not in a position to make any determination as to whether this horse slaughter enterprise has been operated on that basis. However, for some reason or reasons, perhaps totally unrelated to allocation of income and expenses, this Texas horse slaughter house is substantially and consistently unprofitable.

2006 Cavell International, Wastewater Violations Record shows Cavell in violation in every measure (also violated every month of operation 2004 & 2005)

Cavell International, Inc. 108 Harvestore Dr. DeKalb, IL 60115

2006 compliance/performance sampling results

Permit Limits:	BOD mg/l	TSS mg/l	NH3 mg/l	pH S.U.
Daily Maximum	2000	2000	24	5.5-9.5
Monthly Average	500	400	24	

Daily Violations = 47
Monthly Violations = 21

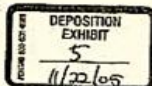
Total : 68

*N.O.D.
Res Pave*

Sample (grab)						Sample (grab)					
Date	Time(am)	BOD	TSS	NH3	pH	Date	Time(am)	BOD	TSS	NH3	pH
1/4/06	8:20	0	30	14.1	7.06	7/5/06	8:30	421.5	120	108	6.33
1/11/06	8:05	1200	280	52.5	7.26	7/12/06	8:20	273	140	32	4.68
1/18/06	8:20	1710	560	29.7	7.37	7/19/06	8:30	871	210	49	8.21
1/25/06	8:15	570	340	89.7	6.78	7/26/06	8:45	30	70	24	8.21
Mo. Ave.		870	302.5	46.5		Mo. Ave.		398.875	135	53.25	
2/2/06	8:15	0	110	25.1	6.68	8/2/06	8:20	30	140	36	8.59
2/8/06	8:00	1230	250	6.24	4.14	8/9/06	8:30	840	90	25	8.12
2/15/06	8:20	810	340	43.7	6.48	8/16/06	8:15	0	110	23	8.65
2/22/06	8:15	1020	120	4.84	7.52	8/23/06	8:50	0	150	89	7.13
Mo. Ave.		765	205	20		8/30/06	8:25	60	260	27	7.3
3/1/06	8:10	1500	540	9.27	8.06	Mo. Ave.		186	150	40	
3/8/06	8:00	1650	230	7.23	3.24	9/6/06	8:50	60	220	16.4	6.92
3/15/06	8:20	990	210	62.8	9.4	9/13/06	8:30	810	400	40.1	3.61
3/22/06	8:15	930	230	36.9	8.93	9/20/06	8:20	750	200	40.2	9.96
3/29/06	8:30	960	90	68.4	9.3	9/27/06	8:15	390	200	50.5	7.05
Mo. Ave.		1206	260	36.9		Mo. Ave.		502.5	255	36.8	
4/5/06	8:40	1050	50	23.7	9.13	10/4/06	8:15	90	210	66	7.27
4/12/06	8:50	570	160	36.4	11.78	10/11/06	8:20	2220	440	78.4	9.42
4/19/06	8:45	120	88	29.9	7.31	10/18/06	8:40	1290	320	86.8	7.16
4/26/06	8:00	810	130	86	8.53	10/25/06	8:20	270	110	30	7.71
Mo. Ave.		637.5	107	44		Mo. Ave.		967.5	270	65.3	
5/3/06	8:20	1110	150	28	9.4	11/1/06	8:30	1080	280	106	5.58
5/10/06	8:20	1320	130	74.3	9.5	11/8/06	8:50	900	284	58.7	7.15
5/17/06	8:45	903	330	19.6	5.65	11/15/06	8:10	1680	210	27.6	7.57
5/24/06	8:40	390	140	28.3	9.9	11/22/06	8:10	390	340	20	7.35
5/31/06	8:45	0	150	30.9	7.62	11/29/06	8:45	1230	250	14.8	7.63
Mo. Ave.		744.6	180	36.2		Mo. Ave.		1056	272.8	45.42	
6/7/06	8:15	1920	730	98.4	6.1	12/5/06	8:15	210	156	16.9	5.5
6/14/06	8:25	1290	108	40.1	7.4	12/13/06	8:30	1200	110	34.8	7.29
6/21/06	8:20	1080	110	63.2	7.53	12/20/06	9:50	1200	90	32.2	7.26
6/28/06	8:30	2340	250	16.1	7.97	12/27/06	8:10	600	180	31	6.96
Mo. Ave.		1658	299.5	54.5		Mo. Ave.		802.5	134	28.78	

List of Dallas Crown employees supports what Olivier Kemseke, owner of Dallas Crown's parent company, Chevideco, told townspeople in 2012 when proposing a plant in Mountain Grove, MO. Chevideco officials stated bluntly that they hired almost exclusively Hispanic immigrants, saying "they are the only people who will do the job."

Accardo, Charles Ferris, TX 75125 9/14/05	Davis-Semon, Nancy Annex, TX 75409 11/8/04	Martinez, Jr., Raul Kaufman, TX 75142 5/20/03	Rodriguez, Miguel Athens, TX 75751 5/13/03	Vega-Aleman, Demetrio Kaufman, TX 75142 1/27/04
Aguilar, Francisco Terrell, TX 75160 4/4/00	Garcia, Jose Kaufman, TX 75142 7/14/05	Ortiz, Juan Kaufman, TX 75142 1/2/02	Rondan, Guadalupe Kaufman, TX 75142 10/3/94	Villegas, David Athens, TX 75751 2/7/97
Bardson, Dorothy Tool, TX 75143 10/3/94	Garcia, Luis Terrell, TX 75160 1/22/01	Perez, Francisco Terrell, TX 75160 3/9/05	Rondan, Maria Kaufman, TX 75142 3/12/04	
Barrios, Martin Athens, TX 75751 4/4/00	Garcia, Pablo Athens, TX 75751 4/10/98	Perez, Jose Terrell, TX 75160 10/2/00	Rondan, Ramona Kaufman, TX 75142 2/21/04	
Bateman, Danny Kaufman, TX 75142 5/20/03	Garcia, Rolando Athens, TX 75751 6/2/03	Ramirez, Antonio Dallas, TX 75227 4/8/99	Ruiz, Jesus Red Oak, TX 75154 9/2/95	
Cabrera, Jose Kaufman, TX 75142 10/8/05	Guzman, Artemio Terrell, TX 75160 5/21/03	Ramirez, Javier Dallas, TX 75227 10/6/05	Ruiz, Ramiro Kaufman, TX 75142 10/3/94	
Carpenter, Shelly Mansfield, TX 76083 4/19/04	Guzman, Esteban Terrell, TX 75160 1/10/01	Ramos, Ramiro Kaufman, TX 75142 2/28/04	Ruiz, Raymundo Kaufman, TX 75142 8/28/03	
Carter III, Richard Oak Ridge, TX 75160 11/10/05	Hernandez, Jose Kaufman, TX 75142 8/24/05	Rivas, Antonio Terrell, TX 75160 9/17/01	Ruiz, Roberto Red Oak, TX 75154 10/3/94	
Castillo, Genaro Athens, TX 75751 5/20/04	Hinojosa, Jesus Kaufman, TX 75142 8/4/03	Rivers, Daniel Terrell, TX 75160 8/15/00	Soenen, Christophe 11/18/03	
Castillo, Manuel Terrell, TX 75160 4/11/01	Lopez, Andres Kaufman, TX 75142 7/10/03	Robertson, Tommy Mabank, TX 75147 10/3/94	Valenzuela, Francisco Terrell, TX 75160 10/3/94	
Cordero, J. Jesus Kaufman, TX 75142 3/26/04	Madera, Nancy Terrell, TX 75160 2/21/04	Rodriguez, David Kaufman, TX 75142 8/5/05	Vaughn, Denny Kaufman, TX 75142 6/18/01	



In Dekalb, IL, Cavel International's waste treatment tank was rebuilt to "state-of-the-art" standards in 2004 after a fire but was never in compliance on its discharge during the entire period (see violations on next page). Its treatment holding tank was photographed a few months before Cavel was closed in 2007, showing foaming blood and grease overflowing/leaking/frozen.



Police summons on wastewater compliance violations for Dallas Crown (see next three pages).

Kaufman Police Department
Offense/Arrest Report Information
For Summons to Municipal Court

REPORT/CITATION #: 400-0073-04

1. OFFENSE: City Ordinance Violation Sec. 10b-105(a)(6)

2. DATE OF OFFENSE: 2-6-04

3. COMPLAINANT: KPD- Code Enforcement

4. ADDRESS: 105 E. Chestnut PHONE #: 932-3094

5. SUSPECT/ACTOR: Dallas Crown Packing
90 Christophe Soenen

6. ADDRESS: 2000 W. Fair PHONE #: _____

7. WITNESS NAMES / ADDRESSES / HOME & WORK PHONE NUMBER
Mike Herritt

(IF RURAL INCLUDE DIRECTIONS TO RESIDENCE)
INCLUDE SHORT SUMMARY ON REVERSE SIDE OF WHAT EACH WITNESS
CAN TESTIFY TO.
Chemical discharge

Kaufman Police Department
Offense/Arrest Report Information
For Summons to Municipal Court

REPORT/CITATION #: 400-0250-04

1. OFFENSE: City Ordinance Violation Sec. 106-105(5)

2. DATE OF OFFENSE: 5-25-04

3. COMPLAINANT: KPD - Code Enforcement

4. ADDRESS: 105 E. Chestnut PHONE #: 932-3094

5. SUSPECT/ACTOR: Dallas Crown

6. ADDRESS: 2000 W. Fair PHONE #: _____

7. WITNESS NAMES / ADDRESSES / HOME & WORK PHONE NUMBER

TSS Max over by 4200 mg/l

(IF RURAL INCLUDE DIRECTIONS TO RESIDENCE)
INCLUDE SHORT SUMMARY ON REVERSE SIDE OF WHAT EACH WITNESS
CAN TESTIFY TO.

Kaufman Police Department
Offense/Arrest Report Information
For Summons to Municipal Court

REPORT/CITATION #: 400-0339-04

1. OFFENSE: CITY ORDINANCE VIOLATION SECTION 106-105(6)
2. DATE OF OFFENSE: 6-23, 2004
3. COMPLAINANT: MIKE MERRITT - CITY OF KAUFMAN WWTP
4. ADDRESS: 209 S. WASHINGTON PHONE #: 972-962-0624
5. SUSPECT/ACTOR: DALLAS CROWN INC.
6. ADDRESS: 2000W FAIR
7. WITNESS NAMES/ ADDRESSES/ HOME & WORK PHONE NUMBERS

BOD over by 33000 mg/l
lab ID# 04-0008194

(IF RURAL INCLUDE DIRECTIONS TO RESIDENCE)
Include short summary on reverse side of what each witness can testify to