

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 7**

**11201 RENNER BOULEVARD**

**LENEXA, KANSAS 66219**

Received by  
EPA Region 7  
Hearing Clerk

**BEFORE THE ADMINISTRATOR**

<b>IN THE MATTER OF</b>	)	
<b>MJB Worldwide LLC,</b>	)	<b>Docket No. FIFRA-07-2021-0023</b>
	)	
<b>Respondent.</b>	)	

**ANSWER AND REQUEST FOR HEARING AND SETTLEMENT CONFERENCE**

Comes Now Respondent MJB Worldwide, LLC, by and through Counsel, Sean W. Pickett, & Associates, LLC., and states the following as their Answer to Complaint, and hereby makes request for a hearing as well as a settlement conference.

1. Respondent hereby Admits allegations in the complaint in paragraphs 1-27, 30-35, 39, 42-44, 47-49, 52-54, 57-59, 62-64, 67-69, 72-74, 77-79, 82-84, 87-89, 92-94, 97-99, 102-104, 107-109, 112-114, 117-119, 122-124, 127-129, 132-134, 137-139, 142-144, 147-149, 152-154, 157-159, 162-164, 167-169, 172-174, 177-179, 182-184, 187-189, 192-194, 197-199, 202-204, 207-209, 212-214, 217-219, 222-224, 227-229, 232-234, 237-239, 242-244, 247-249, 252-254, 257-259, 262-264, 267-268, 273-275, and 278-284.

2. Respondent hereby Denies allegations in the complaint in paragraphs 28, 29, 40, 45, 50, 55, 60, 65, 70, 75, 80, 85, 90, 95, 100, 105, 110, 115, 120, 125, 130, 135, 140, 145, 150, 155, 160, 165, 170, 175, 180, 185, 190, 200, 205, 210, 215, 220, 225, 230, 235, 240, 245, 250, 255, 260, 265, 269, 271, 272, and 276.
3. Respondent is without sufficient knowledge to admit or deny allegations in paragraphs 36, 37, 38, 270, and 277 of the complaint, so denies the same at this time.
4. Respondent hereby answers the following paragraphs 41, 46, 51, 56, 61, 66, 71, 76, 81, 86, 91, 96, 101, 106, 111, 116, 121, 126, 131, 136, 141, 146, 151, 156, 161, 166, 171, 176, 181, 186, 191, 196, 201, 206, 211, 216, 221, 226, 231, 236, 241, 246, 251, 256, 261, 266 consistently with the paragraphs they each reference above according to their individual paragraph numbers referenced therein.
5. Respondent hereby requests a hearing pursuant to 14(a) of FIFRA, 7 U.S.C. section 136/ (a), to contest the either material facts in the complaint or the appropriateness of the penalties requested.
6. The Respondent was ignorant of the requirements of FIFRA that applied to him and until contacted by the EPA he did not intend to violate any of the Statute's sections. Upon knowledge of the law the company withdrew from any violative actions, and took steps to have all products withdrawn from distribution. These facts would be brought to issue at a hearing should one be required.
7. Respondent respectfully hereby requests a settlement conference and will separately contact Katherine Kacsur with such request.

Respectfully,

Sean W. Pickett & Associates, LLC.,

/s:/ Sean W. Pickett

1118 McGee Street, Suite 2000

Kansas City, Missouri, 64106

(816) 472-1600

(816) 472-0200 fax

[swp@kclawoffice.com](mailto:swp@kclawoffice.com)

ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

I Hereby Certify that the above foregoing Answer and request for hearing and request for settlement conference were electronically filed pursuant to notification in the complaint service documents to Region 7 Hearing Clerk at [R7\\_Hearing\\_Clerk\\_Filings@epa.gov](mailto:R7_Hearing_Clerk_Filings@epa.gov) on this 18<sup>th</sup> day of March, 2022.

/s:/ Sean W. Pickett

