

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----x
LETITIA JAMES, Attorney General of the State of New
York,

Plaintiff,

SUMMONS

-against-

SAHADI FINE FOODS PRODUCTS INC.
Defendant.

Index No. _____

IAS Part _____

Assigned to Justice _____

Plaintiff designates KINGS County as the Place of Trial

TO THE ABOVE NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED to answer in this action and serve a copy of your answer, or if the complaint is not served with the summons to serve a notice of appearance, on the plaintiff's attorney within twenty (20) days after the service of the summons, exclusive of the day of service. If the summons is not personally served upon you, or if the summons is served upon you outside of the State of New York, then your answer or notice of appearance must be served within thirty (30) days. In case of your failure to appear or answer, judgment will be taken against you by default, for the relief demanded in the complaint.

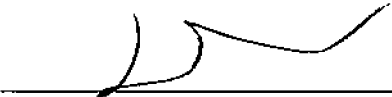
Plaintiff designates Kings County as the place of trial.

Venue properly lies in Kings County pursuant to Section 1112 of the Business Corporation Law because Defendant is a corporation whose office is located in this judicial district.

Dated: January 12, 2023
New York, New York

Respectfully submitted,

LETITIA JAMES
Attorney General of the State of New York



Oluwadamilola E. Obaro
Assistant Attorney General
28 Liberty St—20th Floor
New York, NY 10005
Ph: (212) 416-6316

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
LETITIA JAMES, Attorney General of the State of New
York,

Plaintiff,

VERIFIED COMPLAINT

-against-

SAHADI FINE FOODS PRODUCTS INC.
Defendant.

Index No. _____

IAS Part _____

Assigned to Justice _____

Letitia James, Attorney General of the State of New York (“NYAG”), alleges upon information and belief:

1. The NYAG brings this action to dissolve the corporation SAHADI FINE FOODS PRODUCTS INC. pursuant to Section 1101 of the Business Corporation Law (BCL 1101).

2. BCL 1101 authorizes the attorney general to bring an action to dissolve a corporation on the grounds that the “corporation procured its formation through fraudulent misrepresentation or concealment of a material fact.” BCL § 1101(a)(1).

3. The NYAG seeks to dissolve the corporation SAHADI FINE FOODS PRODUCTS INC. because it has fraudulently misrepresented its name and address.

4. The Certificate of Incorporation filed with the Department of State on November 16, 2022, a true copy of which is affixed to this Complaint as Exhibit A, states that the incorporator of the corporation is Silei Zhou, with an address at 4215 1st[sic] Unit 1, Brooklyn, NY 11232.

5. But 4215 1st Avenue, Unit 1, Brooklyn, NY 11232 is the mailing address for the corporation Sahadi Fine Foods, Inc., a Brooklyn grocer, that has been registered with the

Department of State since 1999 and in operation for more than 120 years. Sahadi Fine Foods, Inc. has no relation to SAHADI FINE FOODS PRODUCTS, INC. *See* Affidavit of Patrick Whelan attached to this Complaint as Exhibit B, *and* Certificate of Incorporation for Sahadi Fine Foods Inc., attached to this Complaint as Exhibit C.

6. Accordingly, the NYAG asks that the Court dissolve the corporation SAHADI FINE FOODS PRODUCTS INC. pursuant to BCL § 1101(a).

PRAYER FOR RELIEF


WHEREFORE, the NYAG respectfully requests that the Court grant

1. an order and judgment dissolving the corporation SAHADI FINE FOODS PRODUCTS INC.
2. such other relief as is just and proper.

Dated: January 12, 2023

New York, New York

LETITIA JAMES
Attorney General of the State of New York


OLUWADAMILOLA E. OBARO
Assistant Attorney General
Consumer Frauds and Protection Bureau
28 Liberty St, 20th Floor
New York, NY 10005
Telephone: (212) 416-6316

VERIFICATION

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss.:

OLUWADAMILOLA E. OBARO, being duly sworn, deposes and says:

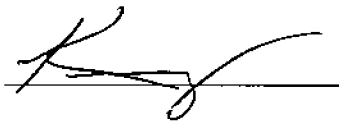
I am an Assistant Attorney General in the office of Letitia James, Attorney General of the State of New York, and I am duly authorized to make this verification.

I have read the foregoing complaint and know the contents thereof, which are to my knowledge true, except as to matters therein stated to be alleged on information and belief, and as to those matters, I believe them to be true. The grounds for my beliefs as to all matters stated upon information and belief are investigatory materials contained in the files of the Bureau of Consumer Frauds and Protection in the New York State Office of the Attorney General.


OLUWADAMILOLA E. OBARO

Sworn to before me this

12 day of January 2023



NOTARY PUBLIC

KRISTIN LILIANA MANZUR
Notary Public, State of New York
Qualified in Richmond County
No. 01MA6318068
Commission Expires January 20, 2023