

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	11/4/2025	
Media Program:	Pesticides	
Regulatory Program(s)	FIFRA	
Company Name:	Border Wholesale, Inc. dba Border Cash & Carry, Inc.	
Facility Name:	Border Cash & Carry	
Facility Physical Location:	610 Lanark Drive, #150	
(city, state, zip code)	San Antonio, Texas 78218	
Mailing address:	610 Lanark Drive, #150	
(city, state, zip code)	San Antonio, Texas 78218	
County/Parish:	Bexar	
Facility Phone Number	(210) 257-0933	
Facility Contact:	Sayed H. Nasafi	Vice President
	Hussein.Nasafi@7starsavings.com	
FRS Number:	N/A	
Identification/Permit Number:	N/A	
Media Identifier Number:	N/A	
NAICS:	459999	
SIC:	5999	
Personnel participating in inspection:		
Justin Mullenix	EPA R6 ECAD	Inspector
Kiera Hancock	EPA R6 ECAD	Inspector
Sayed H. Nasafi	Border Cash & Carry, Inc.	Vice President
EPA Lead Inspector Signature/Date	 Digitally signed by JUSTIN MULLENIX Date: 2025.11.24 12:42:59 -06'00'	
	Justin Mullenix	Date
Supervisor Signature/Date	 Digitally signed by GERARDO ACOSTA Date: 2025.11.24 13:43:37 -06'00'	
	Gerardo Acosta	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

This for-cause marketplace inspection was conducted pursuant to the Federal, Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 8, 7 U.S.C. §136f, and Section 9(a), 7 U.S.C. §136g(a), to evaluate compliance with FIFRA and the regulations thereunder. The inspection occurred for-cause due to suspected distribution or sale of unregistered pesticides.

FACILITY DESCRIPTION

Border Wholesale, Inc. dba Border Cash & Carry, Inc. (“Border Cash & Carry”) is a company incorporated and doing business in the state of Texas that specializes in the wholesale distribution or sale of grocery products including those originating from Mexico. Border Cash & Carry is a subsidiary of AK Rashidzada Corporation dba 7 Star Savings (“7 Star Savings”), a company based in New York. Border Cash & Carry operates a warehouse facility located at 610 Lanark Drive, #150, San Antonio, Texas 78218. According to sources available online, Border Cash & Carry generates approximately <\$1 million in annual revenue, while its parent company, 7 Star Savings, generates approximately \$2.7 million in annual revenue.

Section II - OBSERVATIONS

EPA Inspectors Kiera Hancock and I arrived at Border Cash & Carry on November 4, 2025, at approximately 9:20AM. We entered the facility at approximately 9:30AM. We were met by Mr. Sayad H. Nasafi, Vice President of Border Cash & Carry, and led to a conference room where I presented my inspector credential and a Notice of Inspection (EPA Form 3540-2) to Mr. Nasafi. Mr. Nasafi did not initially sign the Notice of Inspection but later did at the conclusion of the opening conference.

After explaining the scope of the inspection to Mr. Nasafi, I asked a series of questions about the company and its activities, particularly regarding the distribution or sale of any unregistered pesticide cited in the Stop Sale, Use, or Removal Order and Agreement on Consent (SSUROAC) filed in the matter of Border Cash & Carry on August 14, 2025 (EPA Docket No. FIFRA-06-2025-0381). Mr. Nasafi informed us that the unregistered pesticide(s) in question, Fabuloso Ultra Frescura/Frescura Activa (various), was no longer being held for distribution or sale by the company. He further stated that the other products cited in the SSUROAC (“Products Identified on Respondent’s Website”) have never been held at Border Cash & Carry, explaining that those products may only be present at other 7 Star Savings subsidiaries and/or advertised on the 7 Star Savings website. Mr. Nasafi indicated that all Fabuloso Ultra Frescura/Frescura Activa (various) held at Border Cash & Carry had been returned to its original vender(s).

At the conclusion of the opening conference, Mr. Nasafi offered to show Inspector Hancock and I around the warehouse portion of the facility to review the products in inventory. We followed Mr. Nasafi to the warehouse where we were taken to an area where pesticides and cleaning products were being held. I noted the presence of Fabuloso Multi-Purpose Cleaner which Mr. Nasafi explained was a replacement for Fabuloso Ultra Frescura/Frescura Activa (various). We reviewed other cleaning products as well,

noting that none appeared to be within the purview of FIFRA due to the lack of pesticidal claims. Products within the purview of FIFRA, such as insect repellents and insecticides, all appeared to be registered and produced in registered establishments in compliance with FIFRA. One product of interest was discovered that did not contain EPA Registration and Establishment Numbers: Bed Bugs No More. This product, which claims a FIFRA Section 25(b) exemption from registration, did not appear to be fully compliant with the Minimum Risk Pesticide exemption standards and was photographed by Inspector Hancock for further review.

At the conclusion of the facility walkthrough, Inspector Hancock and I followed Mr. Nasafi back to the conference room. I discussed our findings with Mr. Nasafi and explained next steps including the issuance of an inspection report. I asked Mr. Nasafi about the availability of records pertaining to the distribution or sale of Fabuloso Ultra Frescura/Frescura Activa (various) and/or other products of interest to EPA. Mr. Nasafi stated that he would provide such records upon request but would prefer to do so at a later time. I agreed to follow up with Mr. Nasafi on the records request via email.

At the conclusion of the closing conference, I prepared a Receipt for Samples (EPA Form 3540-3) for the photographs taken during the inspection. Inspector Hancock and I also discussed Confidential Business Information and provided an EPA Small Business Resources Information Sheet to Mr. Nasafi. Mr. Nasafi also received courtesy copies of the Notice of Inspection and Receipt for Samples. The inspection concluded at approximately 10:35AM.

Section III – AREAS OF CONCERN

An area of concern identified during the inspection is the potential distribution or sale of an unregistered pesticide, Bed Bugs No More, by Border Cash & Carry.

Section IV – FOLLOW UP

No additional information has been requested or received by EPA after exiting the facility on November 4, 2025. A records request to Border Cash & Carry is pending.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log

Appendix 2 – Notice of Inspection (EPA Form 3540-2)

Appendix 3 – Receipt for Samples (EPA Form 3540-3)

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010001.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Aisle 12 Product Location



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010002.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Fabuloso Multi-Purpose Cleaner (1)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010003.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Fabuloso Multi-Purpose Cleaner (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010004.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Aisle 10 Product Location



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010005.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Aisle 13 Product Location



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010006.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Aisle 17 Product Location



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010007.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Bed Bugs No More (1)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010008.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Bed Bugs No More (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010009.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Bed Bugs No More (3)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010010.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Bed Bugs No More (4)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010011.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Bed Bugs No More (5)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010012.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Bed Bugs No More (6)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010013.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Bed Bugs No More (7)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010014.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Bed Bugs No More (8)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Border Cash & Carry – 610 Lanark Dr, #150		
City: San Antonio	County/Parish: Bexar	State: Texas 78218



File Name: P1010015.JPG

Date: 11/4/2025

Photographer: Kiera Hancock

Description: Aisle 18 Product Location

Appendix 2

Notice of Inspection



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Notice of Inspection

Office of Enforcement and Compliance Assurance

Facility Name <i>Border Cash + Carry (Border Wholesale, Inc.)</i>	Facility Address <i>610 LamarK Dr. #150 San Antonio, TX 78210</i>
Name of Facility Official <i>Sayed H. Nasafi</i>	Title <i>VP</i>

By my signature, I represent that I am an owner, operator or agent in charge of the facility being inspected, and attest that the EPA, Designated State or Political Subdivision Employee or Officer identified on this form presented his or her credentials prior to issuing this Notice of Inspection.

Facility Official's Signature: *[Signature]*

Authority for Inspection

For the purpose of inspecting and obtaining samples of any pesticides or devices packaged, labeled and released for shipment, and samples of any containers or labeling for such pesticides or devices, in places where pesticides or devices are held for distribution or sale [FIFRA § 9(a) (7 U.S.C. § 136g)]; and for the purpose of inspecting and obtaining copies of those records specified in FIFRA § 8 (7 U.S.C. § 136f) and 40 C.F.R. Part 169.

Reasons for Inspections (Check applicable boxes)

☐ Routine Inspection	Violation
☒ For Cause Inspection	Suspected: <i>Distribution/sale of unregistered pesticides</i>

Additional Information: *N/A*

Name of Inspector *Justin Mullenix*

Signature of Inspector *[Signature]*

Date *11/4/25*

Title *Life Scientist*

Time *9:37 AM*

Address *1201 Elm St., Dallas, TX 75270*

Note: The absence of a Facility Official's signature on this form does not invalidate this Notice of Inspection, or establish that consent to the inspection was not provided or that the proper procedures were not followed.

Appendix 3

Receipt for Samples



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Receipt for Samples

Office of Enforcement and Compliance Assurance

Facility Name <i>Border Cash + Carry (Border Wholesale, Inc.)</i>	Facility Address <i>610 Lunark Dr. #150 San Antonio, TX 78218</i>
Name of Facility Official <i>Sayed H. Nasafi</i>	Title <i>VP</i>

Samples Collected (Assign sample number and describe fully (e.g., product name, size, quantity, registration, establishment, lot, batch, model and/or serial numbers, etc.)) The following samples were collected by or on behalf of the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 9(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. §136g).

11/04/2025 - 08750731430001027713 -01-01: 15 photographs

☐ Duplicate samples requested and provided	☒ Duplicate samples not requested	Amount paid	☐ Cash ☐ Credit Card ☒ No Charge
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Acknowledgement of Samples Collected: The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged, labeled and released for shipment.

Facility Official Signature <i>[Signature]</i>	Date <i>Nov-4-2025</i>
Name of Inspector <i>Justin Mullenix</i>	Title <i>Life Scientists</i>
Signature of Inspector <i>[Signature]</i>	Date <i>11/04/2025</i>
Address <i>1201 Elm St., Dallas, TX 75270</i>	

