

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	11/05/2025	
Media Program:	Pesticides	
Regulatory Program(s)	FIFRA	
Company Name:	AK Wholesale LLC	
Facility Name:	AK Wholesale LLC	
Facility Physical Location:	8774 Fawn Trail	
(city, state, zip code)	Conroe, Texas, 77385	
Mailing address:	8774 Fawn Trail	
(city, state, zip code)	Conroe, Texas, 77385	
County/Parish:	Montgomery	
Facility Phone Number	936-827-5080	
Facility Contact:	Razwan Khan	Manager
	akwholesalellc@gmail.com	
FRS Number:	N/A	
Identification/Permit Number:	N/A	
Media Identifier Number:	N/A	
NAICS:	424410	
SIC:	50	
Personnel participating in inspection:		
Kiera Hancock	EPA-ECDST	Inspector
Justin Mullenix	EPA-ECDST	Inspector
Razwan Khan	AK Wholesale LLC	Manager
EPA Lead Inspector Signature/Date	 KIERA HANCOCK Digitally signed by KIERA HANCOCK Date: 2025.12.18 10:16:22 -06'00'	Date
	Kiera Hancock	Date
Supervisor Signature/Date	 Digitally signed by GERARDO ACOSTA Date: 2025.12.18 10:37:46 -06'00'	Date
	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.

This inspection occurred for-cause for suspected sale and/or distribution of unregistered pesticides as identified through their website, <https://akwholesaletx.com/>.

FACILITY DESCRIPTION

AK Wholesale LLC is a wholesale warehouse that specializes in household products, medicines, personal care, and school supplies. Household products included disinfectants, sanitizers, and insecticides. AK Wholesale LLC is incorporated in Texas and is estimated to be a Category II size of business.

Section II - OBSERVATIONS

I, EPA Region 6 inspector, Kiera Hancock, and inspector Justin Mullenix, arrived at AK Wholesale LLC, on November 5, 2025, at approximately 11:55AM. I entered the facility and spoke with an employee who directed us to the manager of AK Wholesale LLC. I identified myself and my colleague as inspectors with the EPA and explained the purpose of our visit. The manager identified himself as Razwan Khan. I requested to move to an office to review and provide documentation. Inspector Mullenix and I presented our federal inspector's credentials, and I provided a Notice of Inspection (EPA Form 3540-2) to Mr. Khan for review and signature (Appendix 1). After the Notice of Inspection was signed, inspector Mullenix and I asked questions about the store and its activities. Mr. Khan informed us that AK Wholesale LLC does not import products but buys from companies within the United States. I provided a list of products observed to be potentially an area of concern on AK Wholesale's website (URL: <https://akwholesaletx.com/>). We then informed Mr. Khan that we would look around and review the pesticidal products being offered for sale at the store.

Mr. Khan, Inspector Mullenix, and I entered the warehouse and observed a small assortment of FIFRA-regulated products being held for sale and distribution. Pesticidal products were reviewed, and Inspector Mullenix took photographs of the product's labels (Appendix 3). Following our review of the pesticidal products, Inspector Mullenix and I reapproached Mr. Khan to discuss the findings of the inspection. We then re-entered the office. I informed Mr. Khan that there were four products of concern that included Fabuloso Ultra Frescura, Ariel Matic, Clorox Ropa, and Clorox (Spanish label). Mr. Khan confirmed that he will set the products aside and not sell or distribute them. I explained the FIFRA regulations and provided him with a Small Business Resource Information Sheet, the Confidential Business Information (CBI) Sheet, and the CBI Notice Questions and Answers. I requested him to provide

three years of sale/distribution and invoices for the products, and he stated he will need some time but will provide them.

I informed Mr. Khan that a copy of the EPA inspection report would be provided to him via email within sixty days. I then provided a Receipt for Samples (EPA Form 3540-3) for the photographs taken for his review and signature. Mr. Khan signed the Receipt for Samples (Appendix 2). A copy of the Receipt for Samples and Notice of Inspection was provided to Mr. Khan. The inspection concluded at approximately 12:35PM.

Section III – AREAS OF CONCERN

Four pesticidal products were observed to be areas of concern. The products include:

1. Fabuloso Ultra Frescura – Mar Fresco (500mL)
2. Ariel Matic
3. Clorox Ropa (930mL)
4. Clorox – Spanish Label (1.89L, 930mL, and 500mL)

All four products labels indicated they are used as pesticides and were not registered within the United States at the time of the inspection. Labeling for the products included, but was not limited to the following claims:

1. Fabuloso Ultra Frescura – Mar Fresco (500mL)
 - a. “Neutraliza Malos Olores, Virus y Bacterias” (Neutralizes bad odors, viruses and bacteria)
 - b. “Antibacterial y Antiviral” (Antibacterial and Antiviral)
 - c. “...elimina virus y bacterias y deja una duradera fragancia” (Eliminates viruses and bacteria and leaves a long-lasting fragrance)
2. Ariel Matic
 - a. “Antibac” (Antibacterial)
 - b. “kháng khuẩn” (Antibacterial)
3. Clorox Ropa (930mL)
 - a. “Quita Manchas y Desinfecta” (Removes stains and disinfects)
4. Clorox – Spanish Label (1.89L, 930mL, and 500mL)
 - a. “48 Horas Prevencion Contra Bacterias” (48 Hours Prevention Against Bacteria)

Section IV – FOLLOW UP

The following information was requested through email by EPA on November 11, 2025, after exiting the Facility on November 5, 2025:

1. Last three years of sale/distribution records for Fabuloso Ultra Frescura, Ariel Matic, Clorox Ropa, and Clorox (Spanish Label).
2. Last three years of invoices for Fabuloso Ultra Frescura, Ariel Matic, Clorox Ropa, and Clorox (Spanish Label).

Section V – LIST OF APPENDICES

Appendix 1 – Notice of Inspection (Form 3540-2)

Appendix 2 – Receipt for Samples (Form 3540-3)

Appendix 3 – Photograph Log – 5 photographs taken on November 5, 2025

Appendix 1

Notice of Inspection (Form 3540-2)



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Notice of Inspection

Office of Enforcement and Compliance Assurance

Facility Name <i>AK Wholesale LLC</i>	Facility Address <i>8774 Fawn Trail Conroe, TX 77385</i>
Name of Facility Official <i>Khan, Razwan</i>	Title <i>Manager</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:

Khan

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:

sale/distribution of unregistered pesticide

Additional Information:

Name of Inspector *Khiera Hanwick*

Signature of Inspector

[Signature]

Date *11/5/2025*

Title *Inspector*

Time *12:00pm*

Address *1201 Elm Street, 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 2

Receipt for Samples (Form 3540-3)



United States
ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

Receipt for Samples

Office of Enforcement and Compliance Assurance

Facility Name <i>AK Wholesale LLC</i>	Facility Address <i>8774 Fawn Trail Cunroe, TX 77385</i>
Name of Facility Official <i>Razwan Khan</i>	Title <i>Manager</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).

11052025-087507-2291-0000611387-02-01-5 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>R Khan</i>	Date <i>11/5/2025</i>
Name of Inspector <i>Niera Hancock</i>	Title <i>Inspector</i>
Signature of Inspector <i>[Signature]</i>	Date <i>11/5/2025</i>
Address <i>1201 Elm Street, Dallas, TX 75270</i>	

Appendix 3

Photograph Log – 5 photographs taken on November 5, 2025



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: AK Wholesale LLC – 8774 Fawn Trail		
City: Conroe	County/Parish: Montgomery	State: Texas



Photo File Name: P1010035.jpg

Date of Photo: 11/05/2025

Time of Photo: 12:05M

Photographer: Justin Mullenix

Description: Front and back label of Fabuloso Ultra Frescura Antibacterial Y Antiviral – Mar Fresco (500mL).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: AK Wholesale LLC – 8774 Fawn Trail		
City: Conroe	County/Parish: Montgomery	State: Texas



Photo File Name: P1010036.jpg

Date of Photo: 11/05/2025

Time of Photo: 12:08PM

Photographer: Justin Mullenix

Description: Front label of Ariel Matic.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: AK Wholesale LLC – 8774 Fawn Trail		
City: Conroe	County/Parish: Montgomery	State: Texas



Photo File Name: P1010037.jpg

Date of Photo: 11/05/2025

Time of Photo: 12:09PM

Photographer: Justin Mullenix

Description: Back label of Ariel Matic.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: AK Wholesale LLC – 8774 Fawn Trail		
City: Conroe	County/Parish: Montgomery	State: Texas



Photo File Name: P1010038.jpg

Date of Photo: 11/05/2025

Time of Photo: 12:11PM

Photographer: Justin Mullenix

Description: Front label of Clorox (Spanish Label).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: AK Wholesale LLC – 8774 Fawn Trail		
City: Conroe	County/Parish: Montgomery	State: Texas



Photo File Name: P1010039.jpg

Date of Photo: 11/05/2025

Time of Photo: 12:13PM

Photographer: Justin Mullenix

Description: Front label of Clorox Ropa.