



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101-3123

**ENFORCEMENT &  
COMPLIANCE ASSURANCE  
DIVISION**

**JUN 3 2019**

Reply to: 20 - C04

**CERTIFIED MAIL — RETURN RECEIPT REQUESTED**

Incorp Services, Inc.  
Registered Agent for Sirowl Technology LLC  
1910 Thomas Avenue  
Cheyenne, Wyoming 82001

**Re: Stop Sale, Use, or Removal Order for Unregistered and Misbranded Pesticides distributed or sold through Amazon.com**  
**Docket No. FIFRA-10-2019-0079**

Dear Madam or Sir:

This letter provides Sirowl Technology LLC (“Sirowl”) notice that the U.S. Environmental Protection Agency, Region 10, (“EPA”) has issued a Stop Sale, Use, or Removal Order (“Order”) prohibiting the distribution or sale of the pesticide products described below under Section 13(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (“FIFRA”), 7 U.S.C. § 136k(a). The enclosed Order is effective immediately upon receipt and pertains to all quantities of these products under Sirowl’s control, ownership, or custody:

**“Bagoro® Cockroach Gel Bait,” EPA Reg. No. 499-507**

**“HaRuion Cockroach Gel Bait,” EPA Reg. No. 499-689**

As discussed in the Order, the products listed above appear to have multiple names and Amazon Standard Identification Numbers (“ASIN”).

Based on inspections and tests, the EPA has determined that the above products are pesticides, which are not registered with the EPA. Therefore, the sale or distribution of these products violates Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A). This provision makes it unlawful to sell or distribute pesticides that are not registered with the EPA.

Moreover, the EPA has determined that the above products are also misbranded in multiple ways, including: (1) their labeling bears false and misleading statements, designs, and graphic representations; and (2) their labeling does not bear the registration number assigned under section 7 [of FIFRA] to each establishment in which it was produced. See Sections 2(q)(1)(A) and (D) of FIFRA, 7 U.S.C. §§ 136(q)(1)(A) and (D). Therefore, the sale or distribution of these products violates Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

Pursuant to Section 13(a) of FIFRA, 7 U.S.C. § 136k(a), the products may not be sold, used, distributed, or removed except in accordance with the conditions outlined in the Order. Any violation of the Order may result in the imposition of civil or criminal penalties as prescribed by Section 14 of FIFRA, 7 U.S.C. § 136l. The Order does not preclude EPA from pursuing other enforcement actions related to this or any other case.

For additional information about this Order, please contact Mr. Chad Schulze at U.S. EPA Region 10, 1200 Sixth Avenue, Suite 155 (20-C04), Seattle, Washington 98101, or at Schulze.chad@epa.gov. Mr. Schulze may be reached by telephone at (206) 553-0505. For any legal matters concerning this Order, including questions from legal counsel, please contact Mr. Brett Dugan, Office of Regional Counsel, at (206) 553-8562 or dugan.brett@epa.gov.

Sincerely,

A large black rectangular redaction box covers the signature area of the letter.

Edward J. Kowalski  
Director

Enclosure

cc: Sirowl Technology LLC

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION X  
1200 6<sup>th</sup> AVENUE, Suite 155  
SEATTLE, WASHINGTON 98101**

<i>In the Matter of:</i>	)	<b>ORDER</b>
	)	<b>SECTION 13(a)</b>
<b>Sirowl Technology LLC,</b>	)	
	)	<b>FEDERAL INSECTICIDE, FUNGICIDE</b>
	)	<b>AND RODENTICIDE ACT</b>
	)	
<b>Respondent</b>	)	<b>Docket No. FIFRA-10-2019-0079</b>
	)	
	)	

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**I. AUTHORITY**

1. This Stop Sale, Use, or Removal Order (“Order”) is issued pursuant to the authority vested in the Administrator of the United States Environmental Protection Agency (“EPA”) by section 13(a) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (“FIFRA”), 7 U.S.C. § 136k(a), which authorizes the Administrator of the EPA to issue an order prohibiting the sale, use, or removal of any pesticide or device by any person who owns, controls, or has custody of such pesticide or device whenever there is reason to believe that, *inter alia*, the pesticide or device is in violation of any provision of FIFRA or the pesticide or device has been or is intended to be distributed or sold in violation of any provision of FIFRA.
2. This authority has been delegated from the EPA Administrator to the Director of the Enforcement and Compliance Assurance Division for EPA Region 10 through the Regional Administrator for EPA Region 10.
3. Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A), provides that it shall be unlawful for any person in any State to sell or distribute to any person any pesticide that is not registered under Section 3 of FIFRA, 7 U.S.C. § 136a.
4. Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), provides that it shall be unlawful for any person to distribute or sell to any person any pesticide which is adulterated or misbranded.
5. Section 2(s) of FIFRA, 7 U.S.C. § 136(s), defines a “person” as “any individual, partnership, association, corporation, or any organized group of persons whether incorporated or not.”

6. Section 2(u) of FIFRA, 7 U.S.C. § 136(u), defines a “pesticide,” in part, as “any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest.” *See also* 40 C.F.R. § 152.15.
7. Section 2(t) of FIFRA, 7 U.S.C. § 136(t), defines a “pest” as “any insect, rodent, nematode, fungus, weed, or . . . any other form of terrestrial or aquatic plant or animal life or virus, bacteria, or other micro-organism (except viruses, bacteria, or other micro-organisms on or in living man or other living animals) which the Administrator declares to be a pest under section [25(c)(1) of FIFRA].”
8. The regulation at 40 C.F.R. § 152.15 states that “a substance is considered to be intended for a pesticidal purpose, and thus to be a pesticide requiring registration, if: (a) the person who distributes or sells the substance claims, states, or implies (by labeling or otherwise) that the substance can or should be used as a pesticide; . . . (b) the substance consists of or contains one or more active ingredients and has no significant commercially valuable use as distributed or sold other than use for pesticidal purpose (by itself or in combination with any other substances); . . . or (c) the person who distributes or sells the substance has actual or constructive knowledge that the substance will be used, or is intended to be used, for a pesticidal purpose.”
9. Section 2(p) of FIFRA, 7 U.S.C. § 136(p), defines “label” as “the written, printed, or graphic matter on, or attached to, the pesticide or device or any of its containers or wrappers.” This section also defines “labeling” as “all labels and all other written, printed, or graphic matter (A) accompanying the pesticide or device at any time; or (B) to which reference is made on the label or in literature accompanying the pesticide or device . . . .”
10. Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg), defines “to distribute or sell” as “to distribute, sell, offer for sale, hold for distribution, hold for sale, hold for shipment, ship, deliver for shipment, release for shipment, or receive and (having so received) deliver or offer to deliver.”
11. The regulation at 40 C.F.R. § 152.3 further defines “distribute or sell” as “the acts of distributing, selling, offering for sale, holding for sale, shipping, holding for shipment, delivering for shipment, or receiving and (having so received) delivering or offering to deliver, or releasing for shipment to any person in any State.”
12. Section 2(w) of FIFRA, 7 U.S.C. § 136(w), defines “produce,” in part, as “to manufacture, prepare, compound, propagate, or process any pesticide or device or active ingredient used in producing a pesticide.”
13. The regulation at 40 C.F.R. § 167.3 further defines “produce” to mean, “to manufacture, prepare, propagate, compound, or process any pesticide, including any pesticide produced pursuant to [Section 5 of FIFRA], and any active ingredient or device, or to package, repack, label, relabel, or otherwise change the container of any pesticide or device.”

14. Under Section 2(q)(1)(A) of FIFRA, 7 U.S.C. § 136(q)(1)(A), “A pesticide is misbranded if its labeling bears any statement, design, or graphic representation relative thereto or to its ingredients which is false or misleading in any particular.”
15. Under Section 2(q)(1)(D) of FIFRA, 7 U.S.C. § 136(q)(1)(D), “A pesticide is misbranded if its label does not bear the registration number assigned under section 7 to each establishment in which it was produced.

## **II. BACKGROUND**

### **A. Sirowl Technology LLC and Selling on Amazon.com**

16. Sirowl Technology LLC (“Sirowl”) is a limited liability company incorporated and located in the State of Wyoming. Therefore, Sirowl is a “person” as defined in Section 2(s) of FIFRA, 7 U.S.C. § 136(s).
17. Amazon Services LLC (“Amazon”) is a corporation located and incorporated in the State of Nevada with its principle place of business located in the State of Washington. Therefore, Amazon is a “person” as defined in Section 2(s) of FIFRA, 7 U.S.C. § 136(s).
18. This Order refers to Amazon and all its divisions, offices, and branches collectively as “Amazon.”
19. Amazon is an indirect subsidiary of Amazon.com, Inc. and offers internet-based retail services to businesses, including Sirowl, and individuals via amazon.com.
20. Amazon acquires and directly distributes products through amazon.com, hereinafter referred to as “Amazon direct sales.”
21. In addition to Amazon direct sales, Amazon provides third-party sellers two fee-based options to sell and distribute their products via amazon.com: the “Selling on Amazon Service” and the “Fulfillment by Amazon” (FBA) service.
22. For Amazon direct sales, Amazon purchases products in bulk quantities, offers the products for sale on Amazon.com, fulfills the orders and ships the products to customers. The amazon.com listing page for products shipped and sold through Amazon direct sales states, “Ships from and sold by Amazon.com.”

23. The “Selling on Amazon Service” allows third-party sellers to advertise and sell their products directly on amazon.com. Third-party sellers participating in the Selling on Amazon Service use Amazon’s account management tools, including multi-feature offer templates, to manage product inventory, listing, presentation, and pricing with the benefits of accessing Amazon’s hundreds of millions of consumers. The third-party sellers work within Amazon’s platform to establish a unique listing page on amazon.com for each product offered for sale. Third-party sellers fulfill and ship their products to customers once an order is placed on amazon.com. The amazon.com listing page for products shipped and sold by third-party vendors states, “Ships from and sold by [Amazon.com profile alias of seller].”
24. According to amazon.com, the “Fulfillment by Amazon” service, “is a service [Amazon] offers sellers that lets them store their products in Amazon’s fulfillment centers, and [Amazon] directly pack[s], ship[s] and provide[s] customer services for these products.” The amazon.com listing page for products shipped and sold by the FBA service states, “Sold by [Amazon.com profile alias of seller] and Fulfilled by Amazon.”
25. Amazon Standard Identification Numbers (“ASIN”) are unique numbers Amazon assigns to each product sold through the Amazon.com marketplace. Products with the same ASIN are identical (or purportedly identical on amazon.com) in all material respects.
26. Amazon assigns a Fulfillment Network SKUs (“FNSku”) to a product when a seller, using the FBA service, ships a product to an Amazon fulfillment center. The additional product identifier allows Amazon to determine what inventory can be used to fulfill a particular seller’s orders. Each ASIN can be made up of one or more FNSku numbers, thus different FNSku numbers can be assigned to identical or purportedly identical products.

**B. Product Distribution and Sale**

27. On multiple occasions between at least November 1, 2017, and April 14, 2019, the products identified generally as the following were offered for sale on amazon.com:
  - (a) Bagoro® Cockroach Gel Bait; and
  - (b) HaRuion Cockroach Gel Bait.
28. On multiple occasions between at least November 1, 2017, and April 14, 2019, Sirowl distributed or sold the products listed in Paragraph 27 directly to amazon.com customers via the Selling on Amazon Service.
29. On multiple occasions between at least November 1, 2017, and April 14, 2019, Sirowl distributed or sold the products listed in Paragraph 27 to Amazon Services LLC who subsequently distributed the products to amazon.com customers via Amazon direct sales or the FBA service.
30. The Bagoro® Cockroach Gel Bait product available for purchase as described in Paragraph 27 and distributed or sold by Sirowl as described in Paragraphs 28 and 29, was listed on amazon.com under multiple names, including:

- (a) Cockroach Bait, Cockroach Gel Bait, Bagoro High Performing Bait Cockroach Killer traps Gel Bait 1 Box (4 Tubes) (4Pack);
  - (b) Bagoro Cockroach Gel Bait, White;
  - (c) Bagoro Cockroach Gel Bait-4 Tubes, White;
  - (d) Roach Bait, Roach Gel, Roach Killer, Roach Traps, Roach Killer Indoor Outdoor, Cockroach Gel Bait 4 Tubes;
  - (e) HaRuion Cockroach Gel Bait, Cockroach Killers, Cockroach Baits, Roach Bait Gel, Gel Bait Formulation, Insecticide Bait Gel 4-Syringes 1.06 Oz Each for Residential, Commercial and Closet Areas, Pest Control; and
  - (f) Roach Bait, Roach Gel, Roach Killer, Cockroach Killer, Roach Traps, Roach Killer Indoor Outdoor, Cockroach Gel Bait 4 Tubes w/plunger High-Performing Quick Control & Non-Repellent Target All Roaches.
31. The Bagoro® Cockroach Gel Bait product available for purchase as described in Paragraph 27 and distributed or sold by Sirowl as described in Paragraphs 28 and 29, was listed on amazon.com under multiple ASINs, including: B0137UGOWW, B07J6FPX4M, B07LBDLPXT, B07GDQM4LV, and B07P95L9XW.
32. The HaRuion Cockroach Gel Bait product available for purchase as described in Paragraph 27 and distributed or sold by Sirowl as described in Paragraphs 28 and 29, was listed on amazon.com under the following name and ASIN, “HaRuion Cockroach Gel Bait, Cockroach Killers, Cockroach Baits, Roach Bait Gel, Gel Bait Formulation, Insecticide Bait Gel 4-Syringes 1.06 Oz Each for Residential, Commercial and Closet Areas, Pest Control,” ASIN: B07GDQM4LV.

C. Pesticide Claims on Product Labeling

33. The product labeling for the Bagoro® Cockroach Gel Bait product contains the following pesticide claims:
- (a) Cockroach Gel Bait;
  - (b) Insecticide;
  - (c) Bagoro Cockroach Gel Bait is designed to control pest species of cockroaches ...;
  - (d) Active Ingredient: Indoxacarb;
  - (e) Cockroaches cannot resist this superior combination and even the toughest populations are quickly controlled;
  - (f) High-performing bait product targeting all pest species of cockroaches; and
  - (g) Bagoro Cockroach Gel Bait can be used indoors or outdoors ... and other areas infested with cockroaches.
34. Therefore, Bagoro® Cockroach Gel Bait is a pesticide as that term is defined in Section 2(u) of FIFRA, 7 U.S.C. § 136(u), and must be registered under Section 3 of FIFRA. 40 C.F.R. § 152.15.
35. The product labeling for the HaRuion Cockroach Gel Bait product contains the following pesticide claims;
- (a) Cockroach Gel Bait;
  - (b) Insecticide;

- (c) Bagoro Cockroach Gel Bait is designed to control pest species of cockroaches ...;
- (d) Active Ingredient: Indoxacarb;
- (e) RADICATION OF COCKROACHES;
- (f) Thorough Cockroach Infestation Control; and
- (g) HaRuion Cockroach Gel Bait can be used indoors or outdoors ... and other areas infested with cockroaches.

36. Therefore, HaRuion Cockroach Gel Bait is a pesticide as that term is defined in Section 2(u) of FIFRA, 7 U.S.C. § 136(u), and must be registered under Section 3 of FIFRA. 40 C.F.R. § 152.15.

D. Product Composition

37. Acephate is a known active ingredient in pesticides. There is no other significant commercially valuable use, besides use as a pesticide, for products that are sold with the active ingredient acephate.

38. Indoxacarb is a known active ingredient in pesticides. There is no other significant commercially valuable use, besides use as a pesticide, for products that are sold with the active ingredient indoxacarb.

39. The labeling for the Bagoro® Cockroach Gel Bait product distributed and sold by Sirowl as described in Paragraphs 28 and 29 states that the product consists of Indoxacarb at 0.6%. However, several of the Bagoro® Cockroach Gel Bait products distributed and sold by Sirowl as described in Paragraph 28 and 29 contained up to 2.2 % by weight of acephate. Therefore, Bagoro® Cockroach Gel Bait is a pesticide as that term is defined in Section 2(u) of FIFRA, 7 U.S.C. § 136(u) and must be registered under Section 3 of FIFRA. 40 C.F.R. § 152.15.

40. The labeling for the HaRuion Cockroach Gel Bait product distributed and sold by Sirowl as described in Paragraphs 28 and 29 states that the product consists of Indoxacarb at 0.6%. Therefore, HaRuion Cockroach Gel Bait is a pesticide as that term is defined in Section 2(u) of FIFRA, 7 U.S.C. § 136(u), and must be registered under Section 3 of FIFRA. 40 C.F.R. § 152.15.

### **III. BASIS FOR THE ORDER**

41. Since March 13, 2018, EPA has been collecting and reviewing a substantial amount of information concerning products being distributed or sold on amazon.com in violation of FIFRA; has conducted several inspections of offers for sale of pesticides on amazon.com; and has obtained and analyzed samples of the products that are subject to this Order. EPA's review of the information gathered and the laboratory testing formed the basis of the factual allegations set forth herein and EPA's reason to believe Sirowl has distributed or sold and intends to continue distributing or selling unregistered and misbranded pesticides in violation of FIFRA.

A. Unregistered and Misbranded Bagoro® Cockroach Gel Bait

42. The Bagoro® Cockroach Gel Bait products distributed and sold by Sirowl as discussed in Paragraph 28 and 29 and offered for sale on amazon.com state on the label the “EPA Reg. No. 499-507” and EPA Establishment Number “7969-WY-2.”
43. The EPA registration number 499-507, corresponds to an insecticide called, “TC 248.” The base registrant for TC 248 is BASF Corporation. The active ingredient in the registered BASF product is dinotefuran at 0.5%. At no time relevant to this Order was Bagoro® Cockroach Gel Bait registered with EPA under Section 3 of FIFRA.
44. The EPA establishment number, “EPA Est. No.7969-WY-2,” is not valid as there is no establishment registered with this number.
45. Therefore, Bagoro® Cockroach Gel Bait is misbranded in numerous ways under Section 2(q) of FIFRA, including Sections 2(q)(1)(A) and 2(q)(1)(D), 7 U.S.C. §§ 136(q)(1)(A) and (D).
46. EPA has reason to believe that on multiple occasions, Sirowl distributed or sold the unregistered and misbranded Bagoro® Cockroach Gel Bait product.
47. EPA has reason to believe the unregistered and misbranded Bagoro® Cockroach Gel Bait product continues to be offered for sale on amazon.com.

B. Unregistered and Misbranded HaRuion Cockroach Gel Bait

48. The HaRuion Cockroach Gel Bait products distributed and sold by Sirowl as discussed in Paragraph 28 and 29 and offered for sale on amazon.com state on the label, “EPA Reg. No. 499-689,” and “EPA Est. No. 8119-CHN-1.”
49. The EPA registration number “499-689” is not valid as there is no registered pesticide with this number. At no time relevant to this Order was HaRuion Cockroach Get Bait registered with EPA under Section 3 of FIFRA.
50. The EPA establishment number, “EPA Est. No. 8119-CHN-1,” is not valid as there is no establishment registered with this number.
51. Therefore, the HaRuion Cockroach Get Bait pesticide product is misbranded in numerous ways under Section 2(q) of FIFRA, including Sections 2(q)(1)(A) and 2(q)(1)(D), 7 U.S.C. §§ 136(q)(1)(A) and (D).
52. EPA has reason to believe that on multiple occasions, Sirowl distributed or sold the unregistered and misbranded HaRuion Cockroach Get Bait product.

53. EPA has reason to believe the unregistered and misbranded HaRuion Cockroach Gel Bait product continues to be offered for sale on amazon.com.

C. Conclusion

54. Therefore, EPA has reason to believe that on multiple occasions between November 1, 2017, and April 14, 2019, Sirowl distributed and sold the following unregistered and misbranded pesticides in violation of Sections 12(a)(1)(A) and (E) of FIFRA, 7 U.S.C. §§ 136j(a)(1)(A) and (E):

- (a) Bagoro® Cockroach Gel Bait; and
- (b) HaRuion Cockroach Gel Bait.

55. EPA has reason to believe that Sirowl intends to further distribute or sell, as the term “distribute or sell” is defined at Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg), and 40 C.F.R. § 152.3, the unregistered and misbranded products listed in Paragraph 54.

IV. ORDER

56. Pursuant to the authority of Section 13(a) of FIFRA, 7 U.S.C. § 136k(a), EPA hereby orders Sirowl to **immediately cease** the distribution, sale, use, or removal of the unregistered and misbranded products listed in Paragraph 54 (collectively “Violative Products”) under its ownership, control, or custody, wherever such products are located, except in accordance with the provisions of this Order.

57. This Order shall extend to all quantities of the Violative Products intended for sale, distribution, and/or any stocks returned to Sirowl from its sellers, customers, or other end-users.

58. The Violative Products shall not be used, sold, offered for sale, held for sale, shipped, delivered for shipment, received, or having so received, shall not be delivered, or offered for delivery.

59. Sirowl may move or remove any Violative Products from any facility or establishment ONLY after obtaining prior written approval from EPA, in accordance with the following:

- (a) Movement or removal requests must be made in writing addressed to Chad Schulze, Enforcement and Compliance Assurance Division, United States Environmental Protection Agency, 1200 Sixth Avenue, Suite 155, Mail Stop 20-C04, Seattle, Washington 98101, or at Schulze.chad@epa.gov;
- (b) Any request for movement or removal must include a written accounting of the products to be moved, the address of the facility from which the products will be moved from, the address of the destination facility, and a description of the reasons for the movement or removal;
- (c) If the movement or removal is for the purposes of disposal, Sirowl must provide written proof of disposal to EPA and the disposal must comply with all applicable federal, state, and local laws;

(d) Any movement or removal of any Violative Products made without prior written authorization from EPA in accordance with this Paragraph constitutes a violation of this Order and distribution and sale of illegal pesticides in violation of FIFRA.

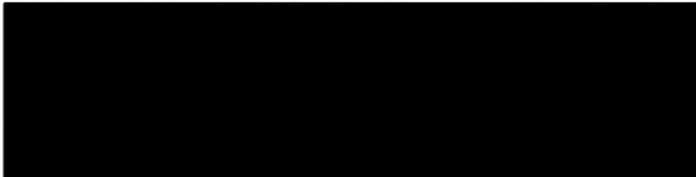
60. Within 30 days of receipt of this Order, Sirowl must submit to EPA a written accounting of the Violative Products subject to this Order. The accounting must be submitted to Chad Schulze, Enforcement and Compliance Assurance Division, United States Environmental Protection Agency, 1200 Sixth Avenue, Suite 155, Mail Stop 20-C04, Seattle, Washington 98101, or at Schulze.chad@epa.gov, and must include an accounting of all existing product inventory, including the locations(s) where the products are held, quantities, and container sizes. Sirowl must provide EPA with an updated accounting at least every 30 days until 150 days following receipt of this order or when Sirowl no longer has any Violative Products in its ownership, custody, or control, whichever occurs earlier.
61. The information requested in Paragraphs 59 and 60 must be provided whether or not Sirowl regards part or all of it as a trade secret or confidential business information. Sirowl is entitled to assert a claim of business confidentiality covering all or any required information, in the manner described at 40 C.F.R. § 2.203(b) by labeling such information at the time it is submitted to EPA as “trade secret” or “proprietary” or “company confidential” or other suitable notice. Information subject to a claim of business confidentiality will be disclosed by EPA to the public only in accordance with the procedures set forth at 40 C.F.R. Part 2, Subpart B. Unless Sirowl makes a claim at the time that it submits the information in the manner described in 40 C.F.R. § 2.203(b), EPA may make this information available to the public without further notice to Sirowl.
62. Sirowl may seek federal judicial review of this Order pursuant to Section 16 of FIFRA, 7 U.S.C. § 136n. The issuance of this Order shall not constitute a waiver by EPA of its remedies, either judicial or administrative, under FIFRA or any other federal environmental law to address this matter or any other matters or unlawful acts not specified in this Order.
63. This Order shall be effective immediately upon receipt by Sirowl or any agents of Sirowl.
64. This Order shall remain in effect unless and until revoked, terminated, suspended, or modified in writing by EPA.
65. If any provision or provisions of this Order is/are subsequently held to be invalid, illegal or unenforceable, the validity, legality and enforceability of the remaining provisions shall not in any way be affected or impaired thereby and they shall remain in full force and effect.

V. OTHER MATTERS

66. For any additional information about this Order, please contact Chad Schulze, Pesticide Enforcement Coordinator, at 206-553-0505. For any legal matters concerning this Order, including questions from legal counsel, please contact Brett Dugan, Assistant Regional Counsel, at 206-553-8562.

Date

6/3/2019



Edward J. Kowalski, Director  
Enforcement and Compliance Assurance Division