



**REGION 9**

SAN FRANCISCO, CA 94105



January 16, 2025

EMAIL: dklarner@twinmed.com

David Klarner  
CFO  
11333 Greenstone Ave  
Santa Fe Springs, CA 90670-4618  
Phoenix, Arizona 85034-1700

Re: Complaint and Notice of Opportunity for Hearing

Dear David Klarner:

Enclosed is a Complaint and Notice of Opportunity for Hearing concerning violations of the Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA"). Specifically, the complaint alleges that Twin Med, LLC violated Section 12(a)(1)(A) of FIFRA by selling or distributing the unregistered pesticide, "WynnMed Germicidal Disinfectant Wipes," on 135 separate instances from 2021 through 2023. EPA will seek a civil penalty for these alleged violations.

You should be aware of the part of the Complaint entitled "Opportunity to Request a Hearing." You are required to respond to this Complaint within thirty (30) days of receipt of the Complaint. If you fail to file an Answer to this Complaint with the Regional Hearing Clerk within thirty (30) days of receipt, your failure shall constitute an admission of all facts alleged in the Complaint and a waiver of your right to a hearing. The proposed civil penalty shall become due and payable sixty (60) days after a final order is issued upon default.

Copies of the following rules and regulations are included for your information: (1) the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties; (2) EPA's Enforcement Response Policy for the Federal Insecticide, Fungicide, and Rodenticide Act, dated December 2009; (3) the FIFRA Enforcement Response Policy; and (4) the Amendments to EPA's Civil Penalty Policies to Account for Inflation (effective January 15, 2024).

Sincerely,

**MATTHEW  
SALAZAR**

Digitally signed by MATTHEW  
SALAZAR  
Date: 2025.01.16 14:37:00 -08'00'

Matt Salazar, P.E.  
Manager, Toxics Section  
Enforcement and Compliance Assurance Division

Enclosure

Complaint and Notice of Opportunity for Hearing

Consolidated Rules of Practice

FIFRA Enforcement Response Policy

Amendments to EPA's Civil Penalty Policies to Account for Inflation