

Final Evidentiary Report of e-Stewards® Critical Non-Conformity

Tech Resale

August 15, 2022

Case Number: 05-10-22-01

Observation Locations/Sources:

- Two Tech Resale (TR) invoices to WT World Trading, Inc. (WTWT))
- TR handwritten notes/credits relative to earlier invoice to WT World Trading Inc.
- Wired payments to TR from WTWT for one shipment
- WhatsApp conversations between TR (Tom Hill) and WTWT (Wajahat Memon)
- The following documents:
 - Audit report from Orion Registrar, Inc. (e-Stewards certification body)
 - Audit report from e-Stewards' Performance Verification program
 - TR's Revenue Verification Form (RVF) to e-Stewards program
 - TR's Licensing Agreement with e-Stewards program
- TR's Downstream Disposition Chart
- Photographs of 'scrap' computers apparently received from TR by WTWT
- Bills of Lading for two shipments from TR through WTWT for export to the United Arab Emirates
- Air Waybill for shipment of laptops to the United Arab Emirates
- Video conference with Henry Hill on May 24, 2022, seeking responses to the initial draft Evidentiary Report which was sent to Mr. Hill the previous week
- Extensive email Q & A between e-Stewards staff and WTWT
- Extensive email Q & A between e-Stewards and TR
- TR's and WTWT's websites
- Two similar spreadsheets of the same 1349 electronic devices, one from WTWT and the other from TR
- Tech Resale's Corrective Action Report

Dates of Observations: November 29, 2021 to July 13, 2022

Appendices:

APPENDIX 1: Tech Resale Invoice #21058 to WT World Trading Inc.

APPENDIX 2: Evernote posting by WT World Trading Inc., including Tech Resale Invoice #21090 to WTWT

APPENDIX 3: Evidence of wire payments from WT World Trading Inc. to Tech Resale for Invoice #21090

APPENDIX 4: Google Drive link and excerpts to unencrypted WhatsApp chats between Tom Hill of Tech Resale and Wajahat Wahid Memon of WT World Trading, Inc.

APPENDIX 5: Photographs of 428 laptops in shipment from TR to broker, intended to compensate for earlier scrap shipment, many of them also broken/scrap

APPENDIX 6: Excerpts of email exchanges (Q & A) between BAN and Wajahat Memon of WT World Trading, Inc.

APPENDIX 7: Bills of Lading for additional shipments from Tech Resale to WTWT's facility in Canada

APPENDIX 8: Tech Resale's statement regarding their exports, found in their "Quality, Environmental, Health and Safety and Stewardship Policy" on their website

APPENDIX 9: Air Waybills for shipping 428 laptops to the United Arab Emirates via WT World Trading, likely corresponding with Tom Hill's handwritten note to WTWT the day before transferring 428 laptops to assuage an unhappy broker who claims he received 'scrap' from Tech Resale

APPENDIX 10: Tech Resale's Downstream Disposition Chart (partial), License Agreement (partial) and Revenue Verification Form (partial)

APPENDIX 11: Screenshots of Tech Resale's online sales listing equipment as "as is not working"

APPENDIX 12: Excerpted spreadsheet entitled "1349 laptops", received from WTWT itemizing 1349 laptops, their serial numbers, and 3 columns describing their condition

APPENDIX 13: Excerpted spreadsheet entitled "21090 audit", received from TR itemizing the same 1349 devices and their serial numbers

APPENDIX 14: Excerpts of email exchanges between Wajahat Memon of WT World Trading, Inc. and Tom Hill of Tech Resale

APPENDIX 15: Tech Resale's Corrective Action Report from an internal audit, indicating TR did not fully disclose testing results on all sales transactions sampled during the audit

| Potential Violations | | | | |
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| | Citation from V4.0 Standard | Requirement | Finding | Determinations Regarding Non-Conformity |
| 1 | 8.5 Reuse & Refurbishment of Electronic Equipment | <p><u>Data sanitization</u></p> <p>The Organization shall also:</p> <p>a) Prohibit the sale, transfer, or donation of non-sanitized EE for Repair, Refurbishment, or Direct Reuse, except to their NAID AAA Certified Immediate Downstream Providers.</p> <p>b) Outsource Repair and Refurbishment processes only to Immediate Downstream Providers</p> <p>Appendix D:</p> <p>8.9.3 Unless otherwise requested by the customer in writing, effectively sanitize all Customer Data prior to its departure from the Organization's Control...</p> <p>8.9.4 The Organization shall verify successful sanitization of all Customer Data, whether clearing, purging or destroying data storage devices...</p> | <p>According to the WhatsApp chat on 07/10/2021 (Oct 7th), 1:17:38 AM (see Appendix 4, question #7), Tom Hill of Tech Resale, apparently trying to appease an unhappy broker, asked Wajahat Memon of WT World Trading, "How many units were within specifications. Assuming I give you ram and hard drive for missing No." Mr. Memon responded by saying "98 percent missing memory and hdd."</p> <p>First, it is evident that the primary intent and purpose of WTWT is to buy and sell EE for subsequent refurbishment and reuse with data bearing devices intact.</p> <p>Second, if 98% were missing memory devices, 2% may have contained them. The nature of these shipments, as described herein, does not provide confidence that data-bearing devices were sanitized prior to leaving TR.</p> <p>Yet, the e-Stewards Standard effective at the time (4.0) prohibits any non-sanitized EE going for repair, refurbishment, or direct reuse a) without the consent of the customer made in writing that such sanitization can be waived or b) unless the job of sanitization is passed to an approved Immediate Downstream Provider. This is true even if HDDs or electronic media are damaged or in small quantities.</p> | <p>NO DETERMINATION (inadequate evidence)</p> <p>TR claims that all drives leaving their facility have been sanitized.</p> <p>WTWT claims that "There were only a few units that had HDD in them. Those drives were no good. I can't tell you if they had data on them because they were not working."</p> <p>BAN DECISION: Given we only have contradictory statements, but no evidence of what, if any, data remained on the HDDs that were shipped to UAE, we will not rule on this matter.</p> |

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| 2 | <p>8.5 Reuse & Refurbishment of Electronic Equipment</p> | <p>Failure to meet extensive requirements in the Reuse & Refurbishment section</p> <p>The Organization shall retain responsibility for conformity with the requirements of this section whether or not the associated processes are outsourced.</p> | <p>TR's invoice #21058 (see Appendix 1) states that shipment of 1804 units were sold to WTWT as "untested", which is Hazardous e-Waste (HEW) under the e-Stewards Standard.</p> <p>Likewise, Invoice #21090 (see Appendix 2) lists the following HEW going via WTWT:</p> <ul style="list-style-type: none"> 1,117 quantity of "4th – 8th gen...Untested..." <p>When asked about "untested" equipment listed in TR's invoices, Henry Hill stated that their invoice language "was problematic".</p> <p>In addition, an email received from WTWT indicates the two shipments did not contain tested, fully functional units (see Appendix 6, B.3. a.).</p> <p>In the WhatsApp exchange on Oct 6, 2021 (see Appendix 4, excerpt), it is apparent Tom Hill was aware that broken equipment was shipped via the broker, WTWT.</p> <p>And yet WTWT is not an Immediate Downstream Provider for reuse or refurbishment [see Appendix 6, B.1.]. WTWT is a broker. The companies that WTWT brokers to, Al Dar Alarabi Used Electronics in UAE, and Wijdan Traders in Pakistan, are processors but are not listed as Immediate Downstream Providers in Tech Resale's Downstream Chart and <u>could</u> not be IDPs for HEWs from the United States, in any case, due to e-Stewards' Basel-compliant trade restrictions.</p> <p>In an Oct 5, 2021 email from Tom Hill to the broker (see Appendix 14 for email chain), Tom said, "I need to know on broken screen, how</p> | <p>Referral to CB for Possible MAJOR NON-CONFORMITY</p> <p>TR apparently sold at least two shipments and credited a third shipment of untested or not fully functional equipment to a broker who was not a vetted and approved Intermediary, Immediate Downstream Processor, or Direct Reuse destination, according to records provided by TR. A significant portion of this equipment was invoiced by TR as 'untested', with batteries of 'unknown percentage'.</p> <p>In response to the draft Evidentiary Report, TR repeatedly claimed they have the testing logs, but they were never provided to e-Stewards. The spreadsheet provided by TR, entitled "21090 audit" (apparently corresponding to Invoice #21090, see excerpt in Appendix 13), shows the exact same serial numbers provided to TR by WTWT after shipment, but no test results or indication of each device's condition (other than referencing the invoice) exists in TR's version of the spreadsheet.</p> <p>TR's response did not include an itemized list for each device, with tests run for full functionality, test results, and other requirements found in section 8.5 of V4 of the e-Stewards Standard. We have no evidence that these two shipments met reuse requirements found in 8.5 of</p> |
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| | | | <p><i>many were visually broken and how many needed to be turned on to be visible?" In an Oct 7, 2021 email from Tom Hill to the broker, Tom said, "...It was simple, you got material that wasn't correct." On Oct. 27, 2021, Tom Hill said to the broker, "So what if a temp packed up the wrong thing, it happens." TR appears to acknowledge that the broker received problematic equipment.</i></p> <p>TR provided a Corrective Action Report after an internal audit (see Appendix 15), which found that <i>"Tech Resale did not fully disclose testing results on all sales transactions sampled during the audit."</i></p> <p>Further, Tech Resale is operating an eBay sales store at https://www.ebay.com/str/techresalellc. A quick glance at this sales store -- entering the words As Is Not Working -- showed 14 listings as of the time of this writing (see Appendix 11 for excerpt). It violates the Standard to sell non-working equipment except to approved, vetted, and reported IDPs that are tasked with an outsourced repair.</p> <p>Therefore, it appears both shipments violated the reuse requirements.</p> | <p>the Standard before being sold to a broker for export.</p> <p>In addition, in the ER appendices there are several instances where Tom Hill admits to sending the broker problematic equipment, and he handwrites 'credit memos' to try to replace 'the wrong thing'.</p> <p>In response to their online sales for "As Is Not Working" equipment, TR only stated that the online seller platform was defective and auto-filled "as is" into the form. That fails to address concerns we list regarding the online store issue, and it was TR's responsibility to ensure that their sales are listed correctly or cease to use the sales platform.</p> <p>BAN DECISION: Evidence indicates a likely major non-conformity with the Standard but does not directly trigger a Critical Non-conformity (CNC). Therefore, as relevant, BAN will refer this matter to the CB.</p> |
| 3 | 8.5.1 Test Electronic Equipment and Ensure Full Functionality & Data Sanitization | <p>Failure to test batteries</p> <p>b) 2) Fully charge each battery and test to determine its health in terms of both load and capacity as follows...</p> | <p>Tech Resale invoice #21090 to WT World Trading indicates that for a quantity of 1,117 plus 251 units, the batteries were all described as <i>"Unknown Battery % (Will include all I have)"</i>. This represents the uncontrolled release of HEW, in violation of 8.5.1.</p> | <p>Referral to CB for Likely MAJOR NON-CONFORMITY</p> <p>In its response, TR simply cites that it tests its batteries prior to resale. But this belies the written word of Tech Resale's own invoice. No further evidence was provided that TR tested, recorded, and determined battery health in these</p> |

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| | | | | <p>shipments. We, therefore, do not believe this to be true.</p> <p>BAN DECISION: Evidence indicates a non-conformity but does not directly trigger a CNC. Therefore, as relevant, BAN will refer this matter to the CB.</p> |
| 4 | <p>8.7 Control of Transboundary Movement</p> <p>Critical Non-Conformity Policy 1.3.2.1 a.</p> | <p>Transboundary movement to developing countries</p> <p>a) The Organization shall manage all whole EE that has not been disassembled or shredded as HEW, unless there is documented evidence to the contrary accompanying the relevant shipment.</p> <p>b) The Organization shall ensure each transboundary shipment throughout the Recycling Chain meets all applicable requirements of this standard, including the compliance obligations identified in 6.1.3.1.</p> <p>a. Willful violation of the import/export provisions of the Standard such that hazardous electronic waste is intended to be exported from a member country of the OECD, EU, or Liechtenstein and to any country outside of that group.</p> | <p>According to emails from Wajahat Memon of WTWT to BAN, a truck picked up loads of EE at TR's Utah facility. Some went straight to LA airport for export to UAE, and others went by truck to Canada, where they would get sorted and repackaged for air travel to UAE. The shipments would go to Al Dar Alarabi Used Electronics, a UAE business (owned by him and his family - see Appendix 6, D.) and scrap would be shipped onwards to Pakistan, to another business owned by his brother -- Wijdan Traders (see Appendix 6, C. and D.)</p> <p>Tech Resale was apparently well aware of the export of their 'untested' (HEW) equipment. There are many indications that the shipments were known to be untested, as described in #2 above, as well as this statement: [15/09/2021, 5:46:45 AM] Tom Hill: <i>"As long as I have been shipping Untested loads I've never had a claim of c2d [Core 2 Duo] units in an iseries load."</i></p> <p>In the WhatsApp conversation (see Appendix 4) at [13/10/2021, 2:08:14 AM], Tom Hill listed the following load: 428pcs / 1,401lbs / 40x48x42, followed by Wajahat Memon responding with: [13/10/2021, 7:54:01 AM] <i>"This Gaylord go directly To Uae</i></p> | <p>CRITICAL NON-CONFORMITY</p> <p>TR failed to provide any evidence to refute our allegations and information which included invoices, bills of lading, air waybills, emails and WhatsApp dialogue between WTWT and TR, all of which indicate that MOCs went multiple times from Tech Resale to an intermediary broker, WTWT, who exported the MOCs, including to UAE, a non-OECD country, in violation of the Standard.</p> <p>In his purported defense, Henry Hill of TR states that, <i>"The Invoices [BAN obtained from WTWT] have been changed and the Cells shrunk to show the word 'Untested' in a negative way."</i> In fact, Mr. Hill provided no evidence of the broker altering the invoices, and more importantly, TR's own use of the term 'untested' in their invoices remains the problem.</p> <p>After giving TR repeated opportunities to provide evidence in rebuttal, it still remains apparent that TR was selling 'untested' equipment to a broker who was exporting to developing</p> |

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| | | | <p>location". At 7:54:18 Tom Hill responded with "Ok".</p> <p>See Appendix 9 for air waybills to UAE for the load of <u>428 pieces that weighed 1,401 lbs</u>, discussed in the paragraph above.</p> <p>In the WhatsApp chat between Tom Hill and Wajahat Memon (see Appendix 4: link, chat text), Tom asks the broker again about export:</p> <p>[19/12/2020, 1:19:13 AM] Tom Hill: <i>"I have a question, where are you shipping these pallets to? are you sending them to your California facility or straight to the airport?"</i></p> <p>[19/12/2020, 1:39:35 AM] WT WORLD TRADING INC <i>"No. It will go via Canada"</i></p> <p>In addition, the export of batteries with <i>"unknown %"</i> (see Invoice 21090 in Appendix 2) is also considered transboundary movement of HEW.</p> | <p>countries in violation of the e-Stewards Standard.</p> <p>BAN DECISION: Given that there is no evidence provided to the contrary and plenty of evidence that these export violations occurred, we determine that this activity is deemed a CRITICAL NON-CONFORMITY.</p> |
| 5 | <p>8.8.1 Downstream Disposition Chart</p> | <p>Downstream Chart omitting some exports, and including non-OECD destinations for HEWs</p> <p>The Organization shall create and keep current a downstream disposition chart documenting the Recycling Chain for all MOCs that move through the Organization's Control...</p> | <ol style="list-style-type: none"> 1) In the chart TR sent to Prema George of e-Stewards, entitled <i>"8.8.1-F Downstream Disposition Chart 1.3"</i>, there is no listing of WTWT, nor its recipient vendors in UAE and Pakistan as approved recipients for the e-waste, which is in this case a Material of Concern (MOC). 2) While reviewing TR's Downstream Chart for any evidence of legitimate e-Stewards business with WTWT, BAN discovered that TR's circuit boards and materials containing MOCs were apparently being exported to a first-tier vendor | <p>Referral of likely MINOR NON-CONFORMITY to CB but contributing to a CRITICAL NON-CONFORMITY (see Allegation 9, "willful misrepresentation")</p> <p>Issue 1) TR did not respond to the allegation that the broker and its destinations were missing from their Downstream Disposition Chart but instead appeared to only address the allegation listed in Row 6, below.</p> <p>By itself, the omission of a vendor from the downstream chart is likely a minor non-conformity for referral to the</p> |

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| | | | <p>in Hong Kong, with a second-tier in Indonesia (see Appendix 10). If accurate, these exports violate section 8.7 and 6.1.3.1 of the e-Stewards Standard and section 1.3.2.1 a. of the Critical Non-Conformity Policy.</p> | <p>CB. However, the omission of the processors in UAE and Pakistan for MOCs contributes to a pattern that indicates willfulness and therefore contributes to the CNC found in Allegation 9</p> <p>Issue 2) TR responded to concerns about their chart listing two non-OCED destination for their HEWs, claiming their consultant made a 'data entry error' (including date of TR's last HEW shipment to those destinations). Indeed, the consultancy involved was contacted by e-Stewards and they took responsibility for the error.</p> <p>Nevertheless, it remains the responsibility of e-Stewards recyclers' top management to accurately document their downstream and approve what their consultants might place on the record.</p> <p>BAN DECISION: Referrals to CB on both counts of Minor Non-Conformities.</p> |
| 6 | <p>8.8.2 Downstream Due Diligence</p> | <p><u>Ignoring the Identification of Downstream Providers and the due diligence requirements</u></p> <p>The Organization shall ensure that its MOCs (Materials of Concern) are managed only by approved Downstream Providers and Intermediaries throughout the Recycling Chain.</p> | <p>Based on the evidence presented in the attached appendices, it appears that TR sold at least two shipments of MOCs to a broker (WTWT), who then sent the material onward to Al Dar Alarabi Used Electronics in UAE, and Wijdan Traders in Pakistan -- two companies that are not listed as Immediate Downstream Providers in TR's Downstream Chart (see Appendix 6). Furthermore, no proper due diligence on WTWT has been provided by TR.</p> <p>Accordingly, the entire section of</p> | <p>Referral of likely MAJOR NON-CONFORMITY to CB</p> <p>TR has responded by simply saying TR meets all requirements for downstream, that they have been audited to this, and only tested working material goes to approved vendors, while all their material recovery flows go to one US processor.</p> <p>However, nothing has been provided to refute the</p> |

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| | | | 8.8.2 appears to have been ignored in selling MOCs (at least twice) to a broker for known immediate export to unidentified DPs. | <p>overwhelming written evidence to the contrary.</p> <p>BAN DECISION: We will pass this violation of the Standard to the CB as it may be relevant as a likely Major Non-Conformity</p> |
| 7 | <p>Revenue Verification Form for e-Stewards Certification / e-Stewards License Agreement</p> <p>Critical Non-Conformity Policy Section 1.3.2.1</p> | <p>Operating out of facilities or ancillary sites which are not reported to auditors/ e-Stewards</p> <p>“...Therefore, to establish the Company’s e-Stewards applicable fees ...the Company must provide BAN with its AGR figure for all applicable business activities, in all of its facilities and operations...”</p> <p>1.3.2.1 A non-conformity taking place by a licensed e-Stewards Recycler/Refurbisher/ organization... is defined as a Critical Non-conformity when one or more of the following takes place:</p> <p>...d. Willful efforts to deceive the conformity assurance program of the e-Stewards certification program, including activities to:</p> <p>(1) Hide locations, such as Ancillary Sites, facilities, related businesses, storage warehouses</p> | <p>In a WhatsApp chat (Appendix 4, link) between Tom Hill and Wajahat Memon on Dec 19, 2020, [19/12/2020, 5:36:12 AM], Tom Hill says: <i>“Hey buddy, sorry I’m running around trying to handle all our locations being shorthanded. I’ll try to get pics tonight if I can get back there. <u>We have 2 other locations across town we handle processing and storage at I have to follow up on.</u>”</i></p> <p>However, TR’s paperwork filed with BAN, Orion Registrar, and BAN’s Performance Verification auditors only indicate one Tech Resale facility.</p> <p>Our research has turned up the following addresses for TR in the past few years:</p> <ul style="list-style-type: none"> • 755 S Main St Suite 4-274, Cedar City, UT 84720 (UPS Store) • 646 S. Main St. #274, Cedar City, UT 84720 (UPS Store) • 260 DL Sargent Drive, Ste. B, Cedar City, UT 94721 (e-Stewards official listing) • 396 N. 2150 W. Ste. B4, Cedar City, UT 84721 (appears to be a warehouse near the airport) <p>The first two addresses were mailbox services used by TR. The Standard does not consider these to be ancillary or processing sites, so these are acceptable.</p> | <p>NO DETERMINATION but cited as evidence of a CNC determination (see “willful misrepresentation” in #9).</p> <p>BAN DECISION: BAN does not consider this issue resolved without a valid explanation or further evidence. However, we consider the failure to answer our repeated question to resolve this issue, however, as another example of willful dishonesty by omission (see Allegation 9).</p> |

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| | | | <p>In TR's responses to our questions about Tom's very clear reference to other storage and processing sites, TR's Henry Hill only explained that the 396 N. 2150 W. address was an earlier rented location, but they moved their electronic waste operations to 260 DL Sargent Drive, Ste. B, Cedar City, UT.</p> <p>Despite multiple questions asking for an explanation, Henry Hill never explained his brother's comments to the broker about multiple sites across town.</p> | |
| 8 | <p>Critical Non-Conformity Policy Section 1.3.2.1</p> | <p>Bringing discredit to the e-Stewards program</p> <p>e. Actions other than those above, which, as judged by the Executive Director of BAN to have, or are likely to, seriously endanger the credibility and viability of BAN or the e-Stewards program. This may include a pattern of repeat major nonconformities, such as repeated failure to perform adequate downstream accountability requirements.</p> | <p>TR apparently sent at least two large shipments through broker WTWT (see Appendix 7), failing to perform adequate testing, due diligence and export controls on Hazardous e-Waste going for repair and end-of-life management in non-OECD countries.</p> <p>In addition to the obvious violations of the e-Stewards Standard, the manner of treating a customer dishonestly has become an issue, particularly the impact that has on bringing discredit to e-Stewards.</p> <p>The evidence, as we have reviewed and placed here in the appendices, indicates that TR admitted to selling problematic devices to WTWT but in the end, failed to compensate their losses due to the shipments not being what the broker believed he agreed to purchase. Consequently, after months of concerted effort to resolve the dispute directly with TR, WTWT turned to the internet and broadcast their complaints to the public/ marketplace. As it is well</p> | <p>CRITICAL NON-CONFORMITY</p> <p>Damage to the e-Stewards program integrity has already occurred as a result of Tech Resale's sales of "untested" laptops to WTWT and the subsequent export of MOCs to non-OECD countries. Further damage to program credibility resulted from the very public complaint lodged by WTWT over a lack of fair business practices.</p> <p>We have carefully reviewed all available evidence (including TR invoices, spreadsheets, WTWT's bills of lading, air waybills, text communications, TR's responses to BAN, etc.), and in this body of information, TR has not provided evidence that would allow us to disbelieve the WTWT fairness complaints.</p> <p>BAN DECISION: Until such time that both parties are satisfied via an independent mediation process that they have been able to reach a fair</p> |

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| | | | <p>known that TR is an e-Stewards Certified Recycler, this has led to damage to the credibility of the e-Stewards program.</p> <p>Henry Hill cites his careful packaging of the shipments to the broker, but this is not relevant with respect to whether the customer got what they paid for.</p> <p>TR provided what they called 'proof of an attempt at mediation' but we see no evidence that mediation took place. WTWTs efforts to receive compensation continue to this day.</p> <p>TR further provided an email from Ron Sanders of RBD Electronics, Inc. to TR. But if anything, this email lends credibility to WTWT, with whom Ron has "been doing business longer than you and I have known one another." This is not evidence that refutes WTWT's/BAN's evidence, but instead implies that WTWT is a reliable business partner in Ron's experience.</p> <p>We are not charged with resolving business disputes in this document but with the protection of the e-Stewards program. The cavalier manner in which WTWT has been dismissed without recompense has resulted in a serious concern to the program's reputational integrity.</p> | <p>settlement, or alternatively, the business dispute has been resolved via a court of law and the resolution of the dispute has been publicly reported as having been resolved to the satisfaction of both parties, we consider this as a Critical non-Conformity.</p> |
| 9 | <p>Critical Non-Conformity Policy Section 1.3.2.2</p> | <p>Willful misrepresentation</p> <p>b. Repeated instances (at least 2 times in the course of the last 5 years) of willful misrepresentation (dishonesty) as determined by the Executive Director, to customers, government officials, auditors,</p> | <p>Evidence found in the appendices (as described above) apparently indicates that TR has willfully misled customers, auditors, TR's certification body, and e-Stewards staff, including:</p> <ul style="list-style-type: none"> Failing to explain how Tom Hill could tell WTWT that they operated out of multiple processing and storage | <p>CRITICAL NON-CONFORMITY</p> <p>Unfortunately, we have found more than two instances (as required in the CNC Policy) of what appear to be willful misrepresentations by TR.</p> |

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| | | certification bodies, and/or BAN staff. | <p>centers when this was then said to not be true.</p> <ul style="list-style-type: none"> • Knowingly engaging in transboundary movement (export) of MOCs without listing these destinations on the Downstream Chart. • Repeatedly claiming they had the testing logs but then never sending those to us. • Stating on their website under “Quality, Environmental, Health and Safety and Stewardship Policy” that <i>“Tech Resale is committed to prevent Transboundary Movement of Materials of Concern (MOCs) in violation of relevant laws, treaties, agreements, and the e-Stewards Standard.”</i> [see Appendix 8] | <p>We have received no substantive evidence to the contrary from TR regarding these apparent willful misrepresentations.</p> <p>Thus, we consider these to be a CNC.</p> |
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Case Description:

The Basel Action Network (BAN) first learned of concerns about e-Stewards processor Tech Resale (TR) directly from Mr. Wajahat Memon of WT World Trading, Inc. (WTWT) on November 29, 2021. Mr. Memon's initial e-mail letter to us referred to a financial dispute between TR and WTWT. Mr. Wajahat Memon claimed that WTWT provided brokering services for equipment from TR to family-related businesses in United Arab Emirates (Al Dar Alarabi Used Electronics) and Pakistan (Wijdan Traders). He complained that in these transactions, WTWT received “scrap” when WTWT had not agreed to accept scrap but rather equipment that could be reused, possibly after some minor repair and refurbishment. Initially, BAN replied to Wajahat Memon that we don't get involved in financial disputes but only can concern ourselves with potential violations of the e-Stewards Standard. Subsequently, on January 28, 2022, BAN received another communication from a friend of the e-Stewards program, raising concerns about TR due to a public complaint posted by Wajahat Memon on the Evernote internet blog.

BAN then began a further investigation of the concerns as we realized that contained within the Evernote financial complaint was evidence of possible violations of the e-Stewards Standard, the e-Stewards Critical Non-Conformity Policy, and the e-Stewards License Agreement.

It became clear after receiving evidence provided by TR and WTWT that TR sold at least two large shipments of “untested” electronic equipment to WTWT, including batteries with “unknown %”. According to the evidence provided, WTWT shipped these shipments by air freight to the United Arab Emirates (UAE) for intended reuse/repair, sometimes after being trucked to Canada first. If not repairable, TR's scrap would then be shipped from the UAE to Pakistan for recycling. Untested equipment is Hazardous e-Waste (HEW) under

the e-Stewards Standard, Version 4.0, and HEWs are considered Materials of Concern (MOCs) which are subject to very special attention both in hand and downstream under the controls stipulated in the Standard 4.0, which was the operational standard at the time of these shipments. For example, the export of MOCs from the United States to non-OECD countries such as the UAE and Pakistan via a broker or directly is prohibited under the Standard. We further obtained evidence that TR was fully aware that the destination of some of its material would be to UAE, thus establishing that the violation was willful.

In his WhatsApp conversation (see Appendix 4, link, chat) at [13/10/2021, 2:08:14 AM] (Oct 13, 2021), Tom Hill of Tech Resale listed the following load: *"428pcs / 1,401lbs / 40x48x42"*, followed by Wajahat Memon responding with: [13/10/2021, 7:54:01 AM] *"This Gaylord go directly To Uae location"*. At 7:54:18 AM, Tom Hill responded with, *"Ok."*

One shipment sold to WTWT from TR occurred on December 16, 2020, and the second shipment was on August 25, 2021 (see Appendices 1 and 2 for the respective invoices and Appendix 3 for two wire transfers from WTWT). An additional shipment was given to WTWT to compensate for earlier problems, reflected in two handwritten credit memos.

Also of great concern is that certified e-Stewards recyclers are not allowed to turn MOCs over to brokers unless they are approved and vetted as Intermediaries that broker materials from the certified facility to another approved downstream provider, all in accordance with the due diligence and export provisions of the Standard. This apparently was not the case in this situation. The broker WTWT is not an approved intermediary, and the facilities in the UAE and Pakistan are not approved downstream providers for MOCs from the US and could not be under the Standard.

On February 25, 2022, Ms. Prema George, e-Stewards Certification Director, asked Henry Hill of TR for a copy of their Downstream Disposition Chart covering January 2021 to January 2022 and received it the same day. There was no listing anywhere on TR's chart for WT World Trading, Inc., nor were any downstream facilities listed in the United Arab Emirates or Pakistan.

In addition, we discovered in the downstream chart provided to us by TR that circuit boards were listed as being exported from TR to China (Hong Kong) and Indonesia for materials recovery -- two other non-OECD countries which are off-limits under the e-Stewards Standard for any MOC material that is not fully functional and destined for direct reuse. Circuit boards that are destined for shredding or smelting are considered HEWs under the Standard and are forbidden for export to non-OECD countries from the United States. Although their consultant took responsibility for erroneously including this information, the certified e-Stewards recycler is responsible for maintaining an accurate Downstream Disposition Chart.

Further, it was revealed in the correspondence and documentation provided by Wajahat Memon that TR claimed it operated from two other locations within Cedar City, Utah, in addition to the single location listed in their official documentation. The following dialogue appears in a WhatsApp conversation (Appendix 4, link) between Wajahat Memon and Tom Hill of TR on December 19, 2020:

[19/12/2020, 5:36:12 AM] Tom Hill says: *"Hey buddy, sorry I'm running around trying to handle all our locations being short-handed. I'll try to get pics tonight if I can get back there. We have 2 other locations across town we handle processing and storage at I have to follow up on."*

After repeated requests, Henry Hill has not explained why his brother told the broker about two other locations used by Tech Resale for “processing and storage”. Instead, he claims that TR used an earlier rented warehouse for other types of businesses (not electronics processing and storage). Still, they have never explained why Tom said there were two additional locations in town. If indeed this were true and there was more than the one claimed location in use for electronics, this is a violation of the Standard and the contract terms of the certification body, as well as of the License Agreement with BAN (see Appendix 10). Without any rationale given for the false statement made to Wajahat Memon by Tom Hill, we have decided not to make a determination on this issue except to note that it contributes to a pattern of willful misrepresentation -- which can be a Critical Non-Conformity.

Finally, let it be noted that the only reason the potential violations of the e-Stewards Standard came to light was due to the fact that the broker, Wajahat Memon of WT World Trading, Inc., grew frustrated that the first shipment (which was on December 16, 2020) contained scrap rather than equipment that was repairable or reusable. He claims the load was filled with broken screens and equipment that he had not agreed to purchase (see email excerpt in letter C of Appendix 6 and photos in Appendix 5). Apparently, in order to resolve the broker’s complaints of receiving e-waste in the first shipment, Tom Hill of Tech Resale contacted Mr. Wajahat Memon offering to make things right with another shipment. According to WTWT, *“he told us he can get me good deal to adjust all these things and give me extra material to cover all these, this after we paid him this [earlier] invoice 21058”*. Mr. Wajahat Memon accepted this offer to compensate for the earlier shipment but apparently received more scrap. After weeks of demanding compensation, Mr. Memon flew into Utah from the UAE to personally view a subsequent shipment. He stayed in Utah 25 days but was only allowed to come to the facility 3-4 times and was only able to see the equipment on top of the shipment stacks. In the end, the third shipment also resulted in about 300 of 450 pieces being found broken upon arrival in the UAE, according to Mr. Wajahat Memon, who documented it with more extensive photographs and a spreadsheet describing the condition of each item. After many months of seeking reparation for his losses from the three shipments, Mr. Memon finally gave up and went public with multiple internet complaints about Tech Resale.

BAN Case Conclusion:

Tech Resale voluntarily chose to become certified to the e-Stewards Standard, which utilizes the Critical Non-Conformity (CNC) Policy in its implementation. The CNC Policy empowers the Executive Director of BAN, the organization that owns the e-Stewards program, to implement procedures and sanctions defined in the policy when a potential or actual Critical Non-Conformity has been identified, either through the audit process or from evidence gathered from other sources.

Throughout its CNC investigation, BAN has provided Tech Resale with multiple opportunities to respond to the draft Evidentiary Report and our follow-up questions by phone and in writing. We have invited Henry to provide countervailing evidence and plausible explanations to refute the extensive evidence and allegations of apparent violations of the [e-Stewards Standard \(V4.0\)](#), the [e-Stewards Critical Non-Conformity Policy](#), and the e-Stewards License Agreement. During the investigation, Tech Resale's e-Stewards license expired while BAN continued with the process. Nevertheless, a final determination on the allegations is important if and when

Tech Resale wishes to rejoin the e-Stewards program, and for the long-term consequences of both organizations and the public to understand the nature of the relationship.

Our final determinations follow:

→ **NO DETERMINATION MADE:** Based on TR's responses to the Draft Evidentiary Report and additional research on the part of BAN, the following two allegations were found to have inadequate or contradictory evidence. Therefore no final determinations were made in:

Allegation #1 (data sanitization violations)

Allegation #7 (unreported sites)

→ Referred to certification body for likely **MAJOR NON-CONFORMITY VIOLATIONS OF STANDARD:** A number of violations were considered likely major non-conformity violations of the e-Stewards Standard, as listed in the table above, and will be referred to the certification body for their further investigation and action. These are found in:

Allegation #2 (Failure to meet extensive requirements in the Reuse & Refurbishment section)

Allegation #3 (Failure to test batteries)

Allegation #6 (Ignoring the identification of Downstream Providers and the due diligence requirements)

→ Referred to certification body for likely **MINOR NON-CONFORMITY VIOLATION OF STANDARD:** Two issues were considered likely minor non-conformities of the e-Stewards Standard, as listed in the table above. The following will be referred to the certification body for their further investigation and action:

Allegation #5 (Downstream Chart omitting some exports and including non-OECD destinations for MOCs)

→ **CRITICAL NON-CONFORMITIES:** Based on the evidence we have received and on TR's responses and lack of responses, we have determined that the following three Critical Non-Conformities occurred:

Allegation #4 (Transboundary movement to developing countries)

Allegation #8 (Bringing discredit to the e-Stewards program)

Allegation #9 (willful misrepresentation)

According to the CNC Policy, if BAN's executive director determines that one or more Critical Non-Conformities exist after fairly administering the process defined in the CNC policy, then determinations and consequential actions will be reported. Such Critical Non-Conformities can result in short-term suspension or longer-term withdrawal of the e-Stewards license (and therefore their certificate from the certification body). It can also result in a public announcement of the violation(s) and the ultimate decision made.

After a careful review, BAN has decided to withdraw from Tech Resale any possibility of being re-certified and licensed to the e-Stewards program for two years from the date of this letter. Further, no such opportunity to rejoin the program will be afforded Tech Resale unless and until there is resolution of the business dispute between WTWT and Tech Resale (as described in Allegation 8, last column) by some combination of mediation and/or compensation that both parties agree in writing that the dispute is resolved to the satisfaction of both. The e-Stewards program has also decided to maintain the right to inform the public of this Evidentiary Report regarding Tech Resale and its findings so that customers and others can make informed choices about how to responsibly handle their used electronic equipment.

As noted in the CNC policy, Tech Resale retains the right to appeal this decision as per the process found on page 6 of the [CNC Policy](#).

END

Appendices

APPENDIX 1

Tech Resale Invoice #21058 to WT World Trading Inc.



INVOICE

260 DL Sargent Dr, Suite B

Cedar City, Utah 84721

Office: 435-213-4784

Fax: 435-213-4781

PURCHASED FROM:

Name WT World Trading Inc
Address 6098 Myra Ave
City, State, ZIP Buena Park, CA 90620-4337
wajahat_wahid@hotmail.com

INVOICE NUMBER: 21058
PO DATE: December 16, 2020
OUR ORDER NO:
YOUR ORDER NO:

TERMS: Wire / TT

REP: TH

SHIPPED VIA: TBD

F.O.B:

PREPAID or COLLECT:

SHIPPED TO: Customer Arranged

Sales Tax Rate:

0.00%

| QUANTITY | DESCRIPTION | UNIT PRICE | AMOUNT |
|---|--|------------|------------------------------------|
| 699 | 4th-8th Gen iSeries / Good Screen / Untested | \$ 75.00 | \$ 52,425.00 |
| 1,105 | 1st-3rd Gen iSeries / Good Screen / Untested | \$ 35.00 | \$ 38,675.00 |
| | Deposit - \$25,000 on 12-16-20 and balance to be paid within 5 business days. Approved TH | | |
| | Customer is responsible for shipping. | | |
| | Units are untested and can be missing battery, cover, lose hinge etc. | | |
| **Disclaimer: Tech-Resale.com does not accept HDD's and accepts no liability for any HDD's received. Please talk to your Rep with any questions. | | SUBTOTAL | \$ 91,100.00 |
| Customer Signature: _____ | | FREIGHT | Cust. Arranged |
| Please sign and email to Support@tech-resale.com | | INSURANCE | |
| | | | \$ 91,100.00 PAY THIS AMOUNT |

THANK YOU FOR YOUR EQUIPMENT!

APPENDIX 2

WTWT's Evernote posting (9 pages long), including Tech Resale Invoice #21090 to WT World Trading Inc.

(<https://www.evernote.com/shard/s611/client/snv?noteGuid=19e37306-6835-c28a-2a3d-b964b75220f7¬eKey=d77d21c70c7238540ad475bc7d8b9fa1&sn=https%3A%2F%2Fwww.evernote.com%2Fshard%2Fs611%2Fsh%2F19e37306-6835-c28a-2a3d-b964b75220f7%2Fd77d21c70c7238540ad475bc7d8b9fa1&title=tech-resale>)

Last updated: Jan 25, 2022

tech-resale

Dirty Little Secrets About the Computer Scam Industry



"Some days before, **Mr. Tom Hill of the United States** had committed a scam with **Mr wajahat Wahid Memon for the US \$ 123120**. Realistically, a perpetrator had done a deal with the victim to send a laptop of series 6th and 8th generation (other accessories), etc.

But, **Mr. Tom Hill has sent a scrap of all such above-mentioned items which are of no use and incomplete**. On the other hand, Mr. Wajahat had done a deal for fresh laptops and other accessories."

260 DL Sargent Dr, Suite B

Cedar City, Utah 84721

Office: 435-213-4784

Fax: 435-213-4781

PURCHASED FROM:

 Name WT World Trading Inc
 Address 6098 Myra Ave
 City, State, ZIP Buena Park, CA 90620-4337
Wajahat Memon (Wally)
wajahat_wahid@hotmail.com
SHIPPED TO:

 INVOICE NUMBER: 21090
 PO DATE: August 25, 2021
 OUR ORDER NO:
 YOUR ORDER NO:
 TERMS: Wire / TT
 REP: TH
 SHIPPED VIA: Customer Arranged
 F.O.B:
 PREPAID or COLLECT: PREPAID

Sales Tax Rate:

0.00%

| QUANTITY | DESCRIPTION | UNIT PRICE | AMOUNT |
|--|---|------------|-------------------------------------|
| 1,117 | i-Series 4th-8th Gen (Some 9th) / Good Screen / UntestedMi Minimum 50% 6-7th Gen / 10% 8th Gen / Majority DELL 50%+ / 30%+ HP / 20% Lenovo & Mix / Ram: 4GB-16GB. Minimum 50% 8GB / 250-1TB HDD / Minimum 80% w/Bottom Panel likely 90-95% / Unknown Battery % (Will include all I have) | \$ 90.00 | \$ 100,530.00 |
| 251 | Dell Precision Workstation (Majority 7720 & 7710) / & HP Zbook 15" & 17" & Lenovo P Series & T540-580 / Minimum 50% 6-7th Gen / 10% 8th Gen / Ram 4GB-16GB. Minimum 50% 8-16GB / 320-1TB HDD Minimum 70-80% w/Bottom Panel / Unknown Battery % (Will include all I have) | \$ 90.00 | \$ 22,590.00 |
| 1,368 | Bulk Pack Fee Will be packed 10 laptops per box. No batteries are to be packed separately, all must be installed in units. Use Extra Small or Small HD Boxes, no more than 60" | No Charge | No Charge |
| Units are untested and can be missing battery, cover keyboard, lose/damaged components except CPU & SCREEN etc. No visibly broken screen or missing CPU. Will credit for these issues. | | SUBTOTAL | \$ 123,120.00 |
| Customer Signature: | | FREIGHT | Cust. Arranged |
| Please sign and email to Support@tech-resale.com | | INSURANCE | |
| | | | \$ 123,120.00 PAY THIS AMOUNT |

THANK YOU FOR YOUR EQUIPMENT!



Wire Instructions

Tech-Resale.com LLC
755 S Main St Suite 4-274
Cedar City, UT 84720

Account:
Routing:
Swift:

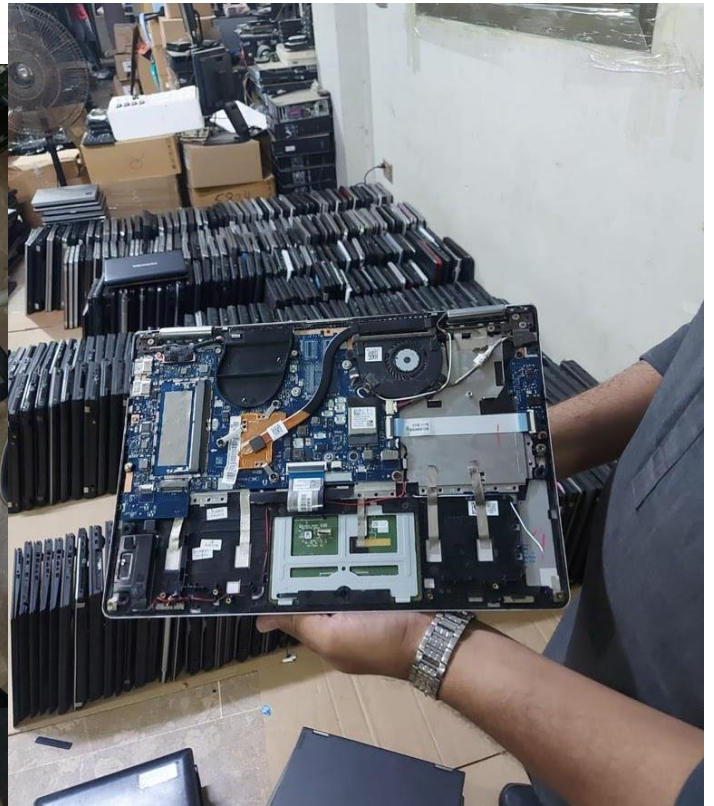
Zions First National Bank
3 South Main St.
Cedar City, Utah 84720

Contact: Dan Jewkes
Phone: (435) 586-2448

Mailing Address:
755 S Main St Suite 4-274 Cedar City, UT 84720
Phone: 888.779.4784 Fax: 435.213.4781
www.tech-resale.com

“The scammer has satisfied in his email and Whatsapp messages that he would send the fresh stock that would be unfaulted. Further, as the stock arrived and was received by us the whole stock was scrap. Such as in some laptops there was neither battery nor hard disk, ram, etc Furthermore, in some laptops, the screens have broken and other accessories are in deteriorating condition.”







“It is hard to ignore that for many days [scammers](#) are not replying to us in email and Whatsapp. It is important to note that his Whatsapp messages and email are saved to Mr. Wajahat, in which the deal was done.

According to the international standard, the item which is told and shown must be delivered without any damage to electronic gadgets, etc.

It is shocking to note that Mr. Tom Hill has committed a violation. Thus it is our core demand and motive to inform Google to save other people from this scammer. Moreover,(Reuters) the well-known investigation agency of the United States must play due role to catch the scammer and give him an exemplary punishment. In the same vein, our US\$ 123120 must be recovered from the perpetrator. In a nod, google should black list Mr. Tom Hill. In addition to this, the primary purpose of this article is to aware of other people from Mr.Tom Hill (Scammer). Because we did a deal with Tom of laptops of 6th and above generations. When we received all the electronic gadgets; all the items were in abysmal condition like garbage and scrap.”

[Click Here](#)

(Appendix 2 continues below)

Credit
Memo



GET TOGETHER

TR Invoice

21090

249 - Workstation

400 - 4th & 5th

588 - 6th & 7th - Min.

100 - 8th - Min.

~~Minimum~~ * Minimum Ram & HDD
as per invoice.

* No Broken LCD & No Leaked

* Try for 100% Bottom Panels &
Keyboards.

Apply current
material to
shipping & customs



Clarion

Tommy Hill

10/6/21

10/12/21 - Packed 428 pcs of 4th-11th
Will include bottom panels and other parts.
(125-150 pcs 4th & 5th Gen) (Majority 6th-8th)

Total pieces needed are 1,337. After today's pallet 909 pieces remain.

We have a large amount of material to still process. Anticipate to complete this order within 7-10 days. This is worst case.*

Tom Hill
Gen 10/12/21

"Most importantly, Mr. Wajahat also approached Mr. Tom Hill in the United States. But Tom is making lame excuses. This to avoid other people from this scammer we have published this article for public awareness. So be cautioned from this scammer and refrain from any deal from Mr. Tom Hill. The details of stock are: laptops of series 4th and 8th generations some 9th so/ good screen untested Mi minimum 50 % 6th to 7th generation 10% majority Dell 50% Rams 4GB to 16GB minimum 50% 8GB/250-ITB HDD 80%, w/bottom panel likely 90 to 95%. But the whole gadgets were scrap. In a nod, emails of Mr. Tom Hill and WhatsApp messages are attached as proof."



Tom Hill LinkedIn In Profile

(End of Appendix 2)

APPENDIX 3

**Evidence of wire payments from WT World Trading Inc. to Tech Resale associated with Invoice #21090
for a total of \$123,120**

| | | |
|----------|---|------------|
| 08/27/21 | WIRE TYPE:WIRE OUT DATE:210827 TIME:0503 ET TRN:2021082700016394 SERVICE REF:004000 BNF:TECH RESALE COM LLC ID:437003965 BNF BK:ZIONS BANCORPORATION N. ID:124000054 PMT DET:352842180 2 1090 | -23,121.00 |
| 08/30/21 | WIRE TYPE:WIRE OUT DATE:210830 TIME:0504 ET TRN:2021083000013312 SERVICE REF:003012 BNF:TECH RESALE COM LLC ID:437003965 BNF BK:ZIONS BANCORPORATION N. ID:124000054 PMT DET:353035336 2 1090 | -99,999.00 |

APPENDIX 4

Google Drive link to (and excerpts from) unencrypted WhatsApp chats between Tom Hill of Tech Resale and Wajahat Wahid Memon of WT World Trading, Inc.

<https://drive.google.com/drive/folders/1Bihry1isXA9Wt781QkWCQFAnVdjJu0gl?usp=sharing>

Excerpts from this document:

The following WhatsApp encrypted exchanges between Tom Hill of TR and Wajahat Wahid Memon of WTWT indicate TR was aware they were shipping broken, non-functional equipment, as TR was trying to appease an unhappy broker who claims he received 'scrap'.

Tom Hill questions are in black font, and WTWT's responses are in **blue font**:

[06/10/2021, 9:27:37 PM] (Oct 6, 2021)

"How many are

1. 1st gen
2. how many 2nd/3rd/. **Total 752 pes damage**
3. how many have visibly broken screen
4. how many have broken screen only when turned on total screen broken/. **305**
5. how many are missing cpu **31 pes**
6. How many workstations / **11 pes**
7. How many units were within specifications. Assuming I give you ram and hard drive for missing
No /**98 percent missing memory and hdd**"

[15/09/2021, 5:43:10 AM] (Sept 15, 2021) Tom Hill to WTWT (Wajahat Wahid Memon): "...Also on the broken screen you are claiming if they were visibly broken or if they were only visible when turned on."

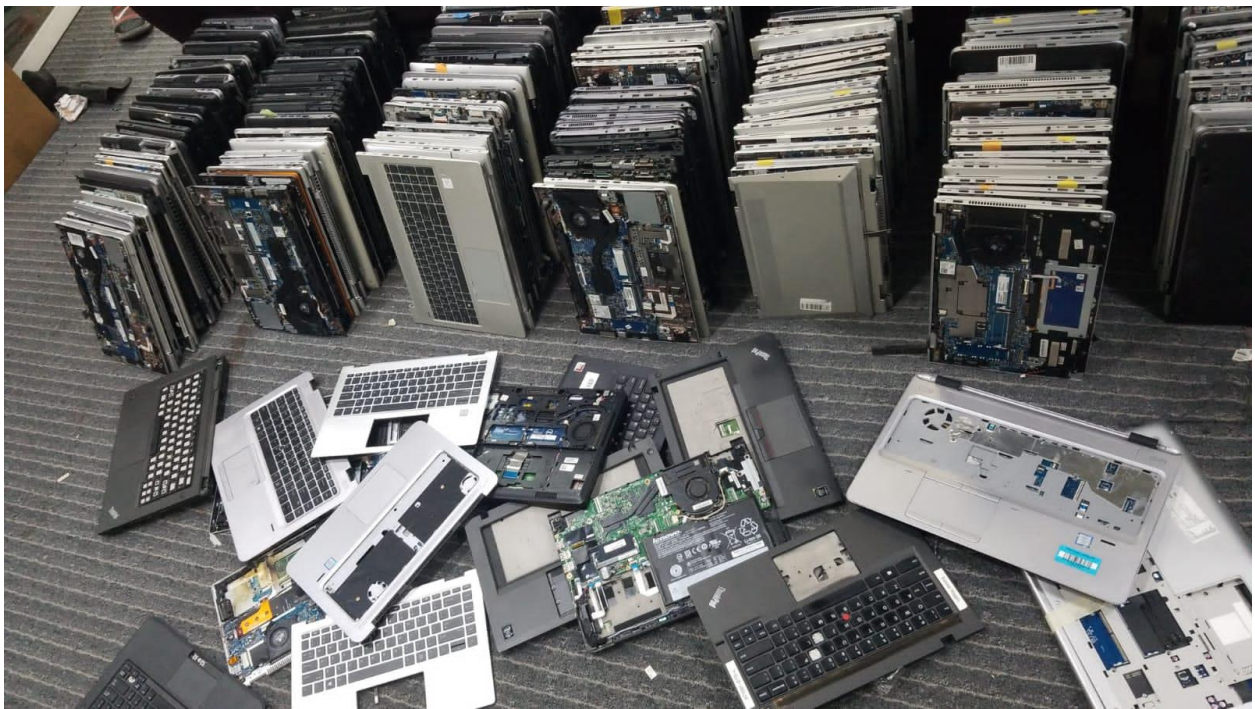
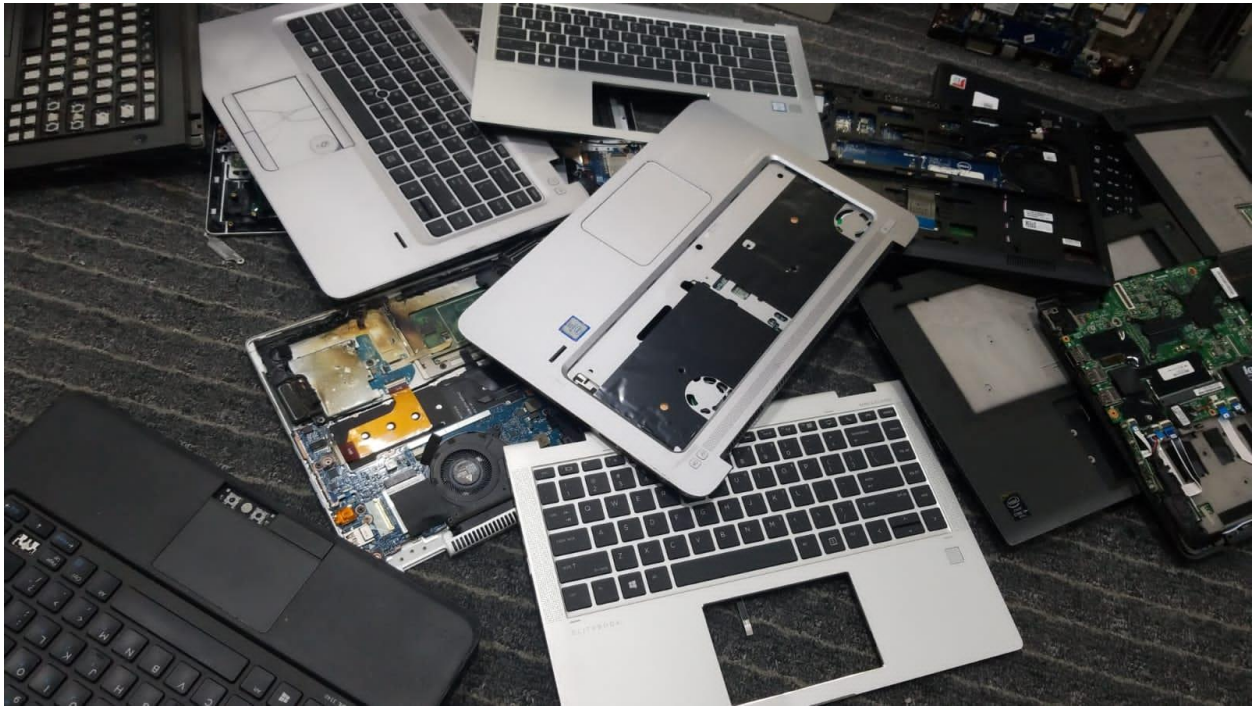
[15/09/2021, 5:46:45 AM] Tom Hill: "As long as I have been shipping Untested loads I've never had a claim of c2d [Core 2 Duo] units in an iseries load."

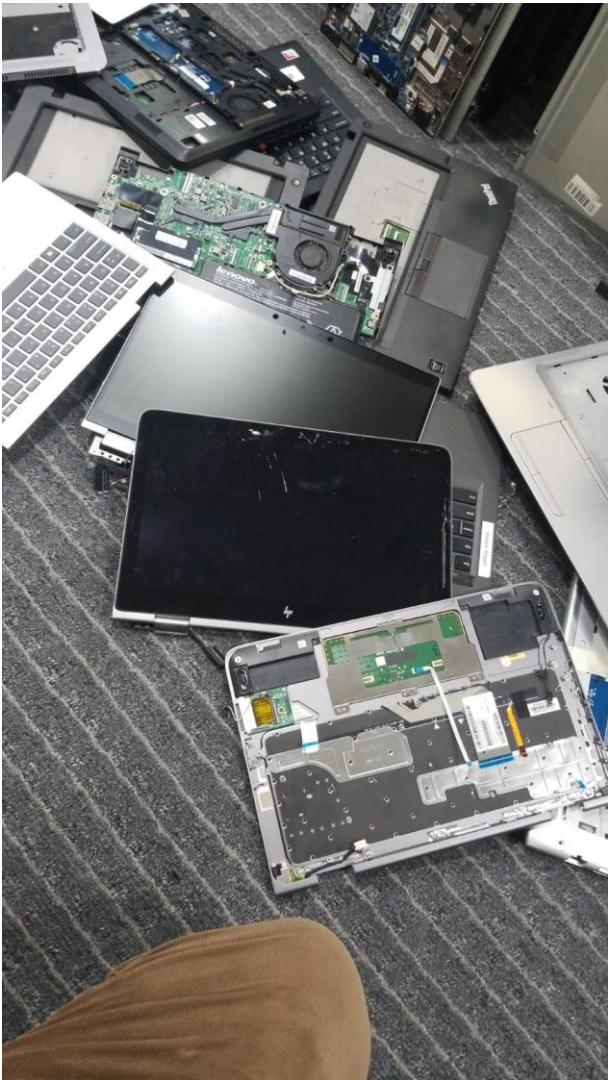
APPENDIX 5

Photographs of 428 laptops in shipment from TR to broker, intended to compensate for earlier scrap shipments, many of them also broken/scrap (3 pages long)

According to broker WT World Trading Inc., photographs of some of the 428 laptops shipped from Tech Resale through WT World Trading, Inc. in order to reconcile for scrap units sent in earlier shipment, corresponding to Tom Hill's 10/12/21 handwritten note (see Appendix 2 above). However, this subsequent shipment also contained many "scrap" units, also violating the e-Stewards requirements for equipment exported for reuse.







APPENDIX 6

Excerpts of email exchanges between BAN and Wajahat Wahid Memon of WT World Trading, Inc. received by BAN

(Questions in black font from BAN; responses from Wajahat Memon in red font)

- A. Excerpted from email received by BAN from Wajahat Wahid Memon, explaining why he chose to do another deal with Tech Resale, after receiving mostly 'scrap' in the earlier shipment (Invoice # 21058) from them:

From Wajahat Memon: "So here is the thing... he [Tom Hill] came to me in Dec 2021 and he told us he can get me good deal to adjust all these things and give me extra material to cover all these this after we paid him this invoice 21058."

- B. Excerpted from email received by BAN from Wajahat Memon on March 24, 2022:
1. Did your company, WT World Trading Inc., provide any computer repair service for Tech Resale ... before exporting all of Tech Resale's equipment? (NO)
...
 3. a. Were all the laptops and other units you received in both shipments from Tech Resale already tested and determined to be fully functional before you took control of them? (NO THEY WERE NOT TESTED)
 4. In one of your encrypted chats with Tom Hill, you said about 98% of equipment was missing HDDs. Did either of the two shipments of material you received from Tech Resale have any HDDs or data-bearing devices in them, and if so, did that equipment contain any customer data? (There were only a few units that had HDD in them. Those drives were no good. I can't tell you if they had data on them because they were not working.)
 - a. Which countries did you export Tech Resale's equipment to, including countries where the equipment may have been transshipped (i.e. stopping en route to its final destination country)? Canada, UAE, and Pakistan.
 - c. Were there any other countries involved besides Canada, UAE, and Pakistan? (NO) Please list all transit and receiving countries you're aware of for the two shipments you obtained from Tech Resale.
 5. Why did you send at least one shipment of Tech Resale's equipment to Canada? Because the overall cost of transportation is cheaper. Material travels by truck to Canada, and Air to UAE or Pakistan. The cost of airfreight from Canada to UAE or Pakistan is less. What happened to the equipment once it reached Canada? The material needed to be repackaged. It was not packaged properly to travel by air per FAA requirements.

- C. Excerpted from email answers received by BAN from Wajahat Wahid Memon on April 5, 2021:
“I would like to mention you that we paid for good materials over invoice of Tech-resale not scrap and invoice are clearly mentioned all details, but unfortunately we found scrap when received it in our customer location.

Yes shipments are route to UAE then route to Pakistan.”

- D. Excerpts from written communication between Jim Puckett (of BAN) and Wajahat Memon (of WTWT) on 4/20/22 and 4/22/22:

JIM: What were the names of the businesses receiving the material in UAE and in Pakistan? Where is Al Dar Alarabi Used Electronics [in UAE, see Appendix 9 for address] and is that run by you?

WAJAHAT: My family member. Including me too.

JIM: What is the business in Pakistan? Name? And run by you also?

WAJAHAT: My brother runs. Wijdan Traders

APPENDIX 7

Bills of Lading for additional shipments trucked from Tech Resale to WTWT's Canadian office

Shipments indicate a pattern of using this broker, who claims shipments to the broker's Canadian location (see https://wtwt-inc.com/uae_aldar_alarabia) contain unwanted 'scrap'.

| POLARIS TRANSPORTATION GROUP <i>Driving Value.</i> POLARIS TRANSPORT CARRIERS INC 7099 TORBRAM ROAD MISSISSAUGA, ON L4T 1G7 Phone: 905 671-3100 Fax: 905 671-4600 | | SHIPPER PLEASE NOTE FREIGHT CHARGES ARE PREPAID ON THIS BILL OF LADING UNLESS MARKED COLLECT | | BILL OF LADING | |
|--|---|--|--|--|----------------------------|
| FREIGHT CHARGES: | | PREPAID | COLLECT | DATE SHIPPED (DDMM/YYYY) 04/01/2021 | |
| SHIPPER (FROM) TECH RESALE | CONSIGNEE (TO) AL DAR AL ARABI USED ELECT | TRACKING NO. P1804349 | | | |
| ADDRESS 260 L SARGENT DR SUITE B | ADDRESS 3133 ORLANDO DR % AES WAREHOUSE (PRIORITY CARGO) | ORIGINAL BILL OF LADING NO. | | | |
| CITY, PROVINCE/STATE POSTAL/ZIP CODE CEDAR CITY, UT 84721 | CITY, PROVINCE/STATE POSTAL/ZIP CODE MISSISSAUGA, ON L4V 1C5 | CUSTOMER ORDER NO. | | | |
| SHIPPER'S PHONE NO. CARRIE EICHEL 7027694008 Ext | CONSIGNEE'S PHONE NO. Ext | PURCHASE ORDER NO. | | | |
| BILL THIRD PARTY FREIGHT CHARGES TO | | BEST OVERNITE EXPRESS INC PLACE PRO-BILL HERE | | | |
| DESCRIPTION | | | | | |
| NUMBER SHIPPING UNITS | HM* | KIND OF PACKAGING, DESCRIPTION OF ARTICLES, SPECIAL REMARKS AND EXCEPTION | NMFC NO. | CLASS | WEIGHT (LBS) Subject to |
| 4 PLT | | USED LAPTOPS Dims: 040-048-055 040-048-055 040-048-055 040-048-055 Bill of Lading :SI WAJA -0001 ***** IMPORTANT ***** PLEASE FAX CUSTOMS DOCUMENTS TO (905) 671-9428 OR EMAIL TO customs@polaristransport.com PLEASE ATTACH THIS BILL ALONG WITH (YOUR ORIGINAL) BILL OF LADING | | | 5,487.00LB |
| I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, are properly classified and packaged, have dangerous goods safety marks properly affixed and displayed on them, and are in all respects in proper condition for transport according to the Transportation of Dangerous Goods Regulations. | | | | | |
| Subject to Section 7 of conditions of Applicable Bill Of Lading, If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement, | | | HAZARDOUS MATERIALS EMERGENCY CONTACT NO. | | |
| SHIPPER SIGNATURE X | | | POLARIS TRANSPORT PER X | | |
| CONSIGNEE'S SIGNATURE - RECEIVED IN GOOD ORDER X | | | PRINT - CONSIGNEE NAME X | | |
| | | | DATE RECEIVED (DDMM/YYYY) | | |
| Printed 2020-12-29 4:39:12 PM hv T | | | Page 1 of 1 | | |



Driving Value.

POLARIS TRANSPORT CARRIERS INC
7099 TORBRAM ROAD
MISSISSAUGA, ON L4T 1G7
Phone: 905 671-3100 Fax: 905 671-4600

BILL OF LADING

SHIPPER PLEASE NOTE

FREIGHT CHARGES ARE PREPAID ON THIS
BILL OF LADING UNLESS MARKED COLLECT

FREIGHT CHARGES:

PREPAID COLLECT

DATE SHIPPED (DD/MM/YYYY)

05/01/2021

| | | |
|--|---|--------------------------------|
| SHIPPER (FROM) TECH RESALE | CONSIGNEE (TO) AL DAR AL ARABI USED ELECT | TRACKING NO. P1804351 |
| ADDRESS 260 L SARGENT DR SUITE B | ADDRESS 3133 ORLANDO DR % AES WAREHOUSE | ORIGINAL BILL OF LADING NO. |
| CITY, PROVINCE/STATE POSTAL/ZIP CODE CEDAR CITY, UT 84721 | CITY, PROVINCE/STATE POSTAL/ZIP CODE MISSISSAUGA, ON L4V 1C5 | CUSTOMER ORDER NO. |
| SHIPPER'S PHONE NO. CARRIE EICHEL 7027694008 Ext | CONSIGNEE'S PHONE NO. Ext | PURCHASE ORDER NO. |

BILL THIRD PARTY FREIGHT CHARGES TO

BEST OVERNITE EXPRESS INC

PLACE PRO-BILL HERE

| NUMBER SHIPPING UNITS | HM* | DESCRIPTION KIND OF PACKAGING, DESCRIPTION OF ARTICLES, SPECIAL REMARKS AND EXCEPTION | NMFC NO. | CLASS | WEIGHT (LBS) Subject to |
|-----------------------------|-----|---|----------|-------|----------------------------|
| 2 PLT | | <p>Dims: 040-048-055 040-048-055</p> <p>Bill of Lading :SI HATT-0003</p> <p>***** IMPORTANT *****</p> <p>PLEASE FAX CUSTOMS DOCUMENTS TO (905) 671-9428 OR EMAIL TO customs@polaristransport.com</p> <p>PLEASE ATTACH THIS BILL ALONG WITH (YOUR ORIGINAL) BILL OF LADING</p> | | | 2,806.00LB |

I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, are properly classified and packaged, have dangerous goods safety marks properly affixed and displayed on them, and are in all respects in proper condition for transport according to the Transportation of Dangerous Goods Regulations.

Subject to Section 7 of conditions of Applicable Bill Of Lading, If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement,

HAZARDOUS MATERIALS
EMERGENCY CONTACT NO.

DECLARED VALUATION MAXIMUM LIABILITY OF \$2.00 PER POUND
(\$4.41 PER KG) UNLESS DECLARED VALUATION
\$

SHIPPER SIGNATURE

X

POLARIS TRANSPORT PER

X

CONSIGNEE'S SIGNATURE - RECEIVED IN GOOD ORDER

X

PRINT - CONSIGNEE NAME

X

DATE RECEIVED (DD/MM/YYYY)

Printed 2020-12-29 4:39:15PM hv T

Page 1 of 1

APPENDIX 8

Misrepresentation of Tech Resale's business activities on its website

At the time of this investigation, the following statement was found on Tech Resale's website under the Certifications tab, in its "Quality, Environmental, Health and Safety and Stewardship Policy":

"Tech-Resale is committed to prevent Transboundary Movement of Materials of Concern (MOCs) in violation of relevant laws, treaties, agreements, and the e-Stewards Standard."

Appendix 9

Air Waybills for 428 laptops apparently from TR to UAE, via WTWT (broker) (3 pages long)

According to Wajahat Memon of WT World Trading, Inc., the following are Air Waybills for equipment Tech Resale offered to WTWT to rectify problems with 'scrap' in earlier loads. Mr. Memon had them air freighted to United Arab Emirates, and found they were also 'scrap'. This shipment of 428 laptops, weighing 1,401 lbs., to UAE appears to correspond with the handwritten note signed by Tom Hill, dated Oct. 12, 2021 (see Appendix 2), the day before this air freight occurred.

In the WhatsApp conversation (see Appendix 4) at [13/10/2021, 2:08:14 AM] (Oct 13, 2021), Tom Hill listed the following load: "428pcs / 1,401lbs / 40x48x42", followed by Wajahat Memon responding with: [13/10/2021, 7:54:01 AM] "This Gaylord go directly To Uae location". At 7:54:18 Tom Hill responded with "Ok."

| | |
|--|---|
| ORIGIN ID: LAXRT (800) 969-4575 WAJAHAT MEMON WT WORLD TRADING INC 6098 MYRA AVE BUENA PARK BUENA PARK, CA 90620 UNITED STATES, US | SHIP DATE: 13OCT21 ACTWTG: 1401.00 LB CAD: 110556473INET4400 DIMS: 48x40x42 IN BILL SENDER ENVIAT: |
| TO USMAN SHEIKH ATTARI ALDARAL ARABI USEDELECT DEVICES TR LLC SHARJAH INDUSTRIAL AREA 6 SECOND STREET INDUSTRIAL SHARJAH, UNITED ARAB EMIRATES, AE | 6572981119 FedEx Express J21202 1070920uv |
| TRK# 2848 5308 2747 H2 INTL ECON FRT | Form 0430 PKG-CUSTOMER S5 DXBRT |
| REF: DESCT: laptops DESC2: DESC3: DESC4: EEI: AES X20211013268585 BOOKING#: 28626429 SLAC: 1 | These items are controlled by the U.S. Government and authorized for export only to the country of ultimate destination for use by the ultimate consignee or end-user(s) herein identified. They may not be resold, transferred, or otherwise disposed of in any manner without the express written approval of the authorized ultimate consignee or end-user(s), either in their original form or after being incorporated into other items, without first obtaining approval from the U.S. government or as otherwise authorized by U.S. law and regulations. |
| COUNTRY MFG: US CARRIAGE VALUE: 0.00 USD CUSTOMS VALUE: 8560.00 USD | SIGN: WAJAHAT MEMON T/C: S 346038721 D/T: R |
| The Montreal or Warsaw Convention may apply and will govern and in most cases limit the liability of Federal Express for loss or delay of or damage to your shipment. Subject to the conditions of the contract on the reverse. FEDEX AWB COPY - PLEASE PLACE IN POUCH | |

After printing this label:

FEDEX AWB COPY - PLEASE PLACE BEHIND CONSIGNEE COPY

1. Fold the printed page along the horizontal line.
2. Place label in shipping pouch and affix it to your shipment.

This Invoice must be completed in English


COMMERCIAL INVOICE

| | | | | | | | |
|---|---|-----------------|---|--------------------------|-----------------------------|---------------------|-------------|
| EXPORTER : Tax ID# : Contact Name : WAJAHAT MEMON Telephone No. : 8009694575 E-Mail : Murat@psparcel.com Company Name/Address : WT WORLD TRADING INC 6098 MYRA AVE BUENA PARK BUENA PARK CA 90620 Country/Territory : United States Parties to Transaction: <input type="checkbox"/> Related <input type="checkbox"/> Non-Related Payment Terms : Purpose of Shipment : Commercial | Ship Date : 13 Oct, 2021 Air Waybill No. / Tracking No. / Bill of Lading : 284853082747 Invoice No. : Purchase Order No. : | | | | | | |
| CONSIGNEE : Tax ID# : Contact Name : USMAN SHEIKH ATTARI Telephone No. : 6572981119 E-Mail : Company Name/Address : ALDARALARABIUSELECTRODEVICES TRLLC SHARJAH INDUSTRIAL AREA_6 SECOND STREET INDUSTRIAL SHARJAH Country/Territory : United Arab Emirates | SOLD TO (if different from Consignee) : <input checked="" type="checkbox"/> Same as CONSIGNEE : Tax ID# : Company Name/Address : Country/Territory : | | | | | | |
| If there is a designated broker for this shipment, please provide contact information Name of Broker Tel No. Contact Name Duties and Taxes Payable by <input type="checkbox"/> Exporter <input checked="" type="checkbox"/> Consignee <input type="checkbox"/> Other If Other, please specify | | | | | | | |
| No. of Packages | No. of Units | Unit of Measure | Description of Goods | Harmonized Tariff Number | Country/Territory of Origin | Unit Value | Total Value |
| | 428.00 | PCS | Commercial - laptops | | US | 20.000000 | 8,560.00 |
| Total No. of Packages : 1 | | | Total Weight (Indicate LBS or KGS) : 1,401.00 lbs | | | Terms of Sale : DDU | |
| Special Instructions : Declaration Statement(s) : These commodities are authorized by the U.S. Government for export only to United Arab Emirates for use by USMAN SHEIKH ATTARI. They may not be transferred, transshipped, or otherwise disposed of in any other country, either in their original form or after being incorporated into other end-items, without prior approval of the relevant U.S. government agency. I declare that all the information contained in this invoice to be true and correct | | | | | | Subtotal : | 8,560.00 |
| | | | | | | Insurance : | 0.00 |
| | | | | | | Freight : | 0.00 |
| | | | | | | Packing : | 0.00 |
| | | | | | | Handling : | 0.00 |
| Originator or Name of Company Representative if the invoice is being completed on behalf of a company or individual : | | | | | | Other : | 0.00 |
| | | | | | | Invoice Total : | 8,560.00 |
| Signature / Title / Date | | | | | | Currency Code : | USD |
| | | | | | | 13 Oct, 2021 | |

Appendix 10

Tech Resale's Downstream Disposition Chart (partial), Revenue Verification Form (partial), and Attachment C of License Agreement with BAN (partial)

Tech Resale's Downstream Disposition Chart (partial)

|  Downstream Disposition Chart | | | | | | |
|--|-------------------|--|--|--------------------|--|-------------|
| Tier | Company | Address | Corporate Address | Contact | Materials Handled | Processes |
| | | | | | | |
| | | | | | | |
| 1 | Wai Mei Dat Group | DD124 Sha Chau Lei, Yuen Long, New Territories, Hong Kong | DD124 Sha Chau Lei, Yuen Long, New Territories, Hong Kong | eric@waimeidat.com | Wiped punched drive, circuit board containing material | Disassembly |
| 2 | PT Esun | Kawasan Industri Sungai Harapan, Kec. Sekupang, Batam-29428, Kepulauan Riau, Indonesia | Kawasan Industri Sungai Harapan, Kec. Sekupang, Batam-29428, Kepulauan Riau, Indonesia | <u>John Kim</u> | Circuit Boards | Shredding |

Revenue Verification Form (Partial), indicating no ancillary sites

| Checkmark AGR Here | Licensee Annual Gross Revenue (AGR) | Annual License Fee | Ancillary Sites Fee \$250 per site (Enter a max. of 5 sites, or \$1,250) | Processing Sites Fee (\$250 per site) | TOTAL ANNUAL FEE (Add 3 columns to the left) |
|--------------------------|---|--------------------------|---|--|--|
| | <\$1M | \$500 | x \$250 = \$ | x \$250 = \$ | \$ |
| ✓ | \$1 - 1.9M | \$1,300 | 0 x \$250 = \$ 0 | 1 x \$250 = \$ 250.00 | \$ 1,550.00 |
| | \$2 - 2.9M | \$2,100 | x \$250 = \$ | x \$250 = \$ | \$ |
| | \$3 - 3.9M | \$2,750 | x \$250 = \$ | x \$250 = \$ | \$ |
| | \$4 - 4.9M | \$3,400 | x \$250 = \$ | x \$250 = \$ | \$ |
| | \$5 - 7.9M | \$5,400 | x \$250 = \$ | x \$250 = \$ | \$ |
| | \$8 - 10.9M | \$8,300 | | | |

Licensing Agreement (excerpt) with Tech Resale




Attachment C: Licensed Entities, Processing Facilities and Ancillary Sites in One Country

List all controlled processing facilities and ancillary sites, as well as subsidiaries that process electronic devices (as defined by the e-Stewards Standard), that are owned by the same entity (fully owned or owning a controlling interest) and located in the same country. Also, indicate which facility is the Headquarters. This Attachment must be updated and submitted to the e-Stewards Program administrator within 14 business days whenever facilities, ancillary sites and/or subsidiaries are added, removed or relocated. If there is a change in company name or ownership, a new License Agreement must be executed.


| Processing Sites | | | |
|------------------|---|----------------|-------------|
| Facility Name | Address | Phone | In Process? |
| Tech-Resale | 260 DL Sargent Dr Suite B Cedar City, UT, United States 84721 | (888) 779-4784 | No |


Appendix 11

Screen Shot of Tech Resale's e-Bay site showing 14 listings of "as is not working" equipment being sold, and examples of these



 Shop by category  All Categories  [Search](#) [Advanced](#)

☐ Include description

**TECH-
RESALE
.COM**




Tech-Resale.com 
147 Followers
99.6% Positive feedback
7.3K Items sold

About us
Tech Resale was established in 2012.
Specializing in Surplus Technology Equipment
including industrial, scientific, semiconductor...
[Learn more](#)



Category  


All

[Business & Industrial](#)
[Other Test, Measurement & Inspection](#)
[Adjustable Power Supplies](#)

[All Listings](#) [Accepts Offers](#) [Auction](#) [Buy It Now](#) [Condition](#)  [Shipping](#)  [Local](#) 

14 results for **as is not working** [Save this search](#)

[Best Match](#)  

Shipping to: 98115 



VELCONIC - VLASV-012P2-RX - 200V -
ASSY:0000 - 50/60Hz - AS IS/FOR PARTS
Parts Only

\$299.92

or Best Offer

Free 4 day shipping

Free returns

Last one



Panasonic - AC SERVO DRIVE - MSD043A1XX -
AS IS - FOR PARTS OR REPAIR
Parts Only



\$699.87

or Best Offer

Free 4 day shipping

Free returns



Panasonic - AC SERVO DRIVE - MSD013A1XX -
ERROR CODE 16. - AS IS - FOR PARTS
Parts Only

★★★★★ (1)



\$699.87

or Best Offer

Free 4 day shipping

Free returns



APPENDIX 12

Excerpts from spreadsheet entitled “1349 laptops”, produced by WTWT itemizing (weeks after the shipment) laptops they received from Tech Resale with Invoice #21090

According to both parties, WTWT created this spreadsheet of the 1349 units shipped from TR, listing their condition in three columns (Description, Back Cover, and Other). See Appendix 13 for TR’s revision of the same spreadsheet.

| 1 | Make | Model | Serial | Description | Pro- cessor | Gen | RAM | HDD | Back Cover | Other |
|----|------|-------|--|-------------|----------------|-----|-----|-----|-----------------|-------|
| 2 | Dell | E6410 | CN0667CC129610BD027EA01 | No Display | | 1st | | | | |
| 3 | Dell | E6339 | 3289078100061 | No Display | | 3rd | | | | |
| 4 | Dell | E6430 | 2lhs9w1 | No Display | | 3rd | | | | |
| 5 | Dell | E6430 | 694hzw1 | No Display | | 3rd | | | | |
| 6 | Dell | E6430 | 81z2xy1 | ON/OFF | | 3rd | | | | |
| 7 | Dell | E6430 | TA052064 | No Display | | 3rd | | | | |
| 8 | Dell | E6420 | CN032T9K12961189GEUQA01 | No Display | | 2nd | | | No Backcover | |
| 9 | Dell | E6420 | FR7T3R1 | No Display | | 2nd | | | | |
| 10 | Dell | E5430 | CN034C901296138E01C3, 3236239900033 | ON/OFF | | 3rd | | | No Backcover | |

...

| | | | | | | | | | | |
|----------|------|-------|---------------|---|----|-----|--|-----------------|---------------|---------------|
| 340 | Dell | e7470 | 9WJWVD2 | | i5 | 6th | | | No Battery | No Battery |
| 134 1 | Dell | e7470 | 8H64WD2 | | i5 | 6th | | | No Battery | No Battery |
| 134 2 | Dell | e7450 | 3696862700010 | | i5 | 5th | | No Backcover | No Battery | No Battery |
| 134 3 | Dell | e7450 | 3846601700001 | | i5 | 5th | | No Backcover | No Battery | No Battery |
| 134 4 | Dell | e7450 | 3747761300005 | Top Damage | i5 | 5th | | No Backcover | No Battery | No Battery |
| 134 5 | Dell | e7450 | 3736622100002 | Top Damage | i7 | 5th | | No Backcover | No Battery | No Battery |
| 134 6 | Dell | e7450 | 3857196200003 | Top Damage | i7 | 5th | | No Backcover | No Battery | No Battery |
| 134 7 | Dell | e7450 | 3915441100027 | Top Damage | i7 | 5th | | No Backcover | No Battery | No Battery |
| 134 8 | Dell | e7450 | 3779656300008 | No Display, NO Keybd, NO Fan, Top Damage | | 5th | | No Backcover | No Battery | No Battery |
| 134 9 | Dell | e5470 | 74w4r72 | | i7 | 6th | | | No Battery | No Battery |
| 135 0 | Dell | E5470 | 4v3rm72 | Backcover damage, No Keyboard | i7 | 6th | | | No Battery | No Battery |

APPENDIX 13

Excerpted Spreadsheet from Tech Resale, entitled “21090 audit”, itemizing 1349 devices & serial # for Invoice #21090 shipped to WTWT

The excerpted spreadsheet below from Tech Resale to WT World Trading pertains to 1349 devices sold to the broker on Invoice #21090. Column headers do not record required information for each device destined for reuse, as required in 8.5.2 of the Standard, such as:

- b) ...Type of testing and, if applicable, data sanitization performed on each device or separate component;
- c) Results of tests performed, including:
 1. An accurate representation of the condition of the device or component (including cosmetic condition and battery status); and
 2. A description of missing components (if applicable); and
 3. Confirmation that all equipment & components are Fully Functional...

When asked what exactly “INV dictates” means, since the above required records are missing, Henry Hill responded “*INV refers to inventory, as in the hardware is pulled as spec by the deal from our inventory. This is dictated via the invoice.*” But the invoice does not contain required information.

| 1 | Make | Model | Serial | Processor | ProcessorGen | RAM | HDD |
|----|------|-------|--|-----------|--------------|--------------|--------------|
| 2 | Dell | E6410 | CN0667CC129610BD027EA01 | | 1st | INV dictates | INV dictates |
| 3 | Dell | E6339 | 3289078100061 | | 3rd | INV dictates | INV dictates |
| 4 | Dell | E6430 | 2lhs9w1 | | 3rd | INV dictates | INV dictates |
| 5 | Dell | E6430 | 694hzw1 | | 3rd | INV dictates | INV dictates |
| 6 | Dell | E6430 | 81z2xy1 | | 3rd | INV dictates | INV dictates |
| 7 | Dell | E6430 | TA052064 | | 3rd | INV dictates | INV dictates |
| 8 | Dell | E6420 | CN032T9K12961189GEUQA01 | | 2nd | INV dictates | INV dictates |
| 9 | Dell | E6420 | FR7T3R1 | | 2nd | INV dictates | INV dictates |
| 10 | Dell | E5430 | CN034C901296138E01C3, 3236239900033 | | 3rd | INV dictates | INV dictates |

...

| | | | | | | | |
|--|------|-------|---------------|----|-----|--------------|--------------|
| | Dell | e7470 | 9WJWVD2 | i5 | 6th | INV dictates | INV dictates |
| | Dell | e7470 | 8H64WD2 | i5 | 6th | INV dictates | INV dictates |
| | Dell | e7450 | 3696862700010 | i5 | 5th | INV dictates | INV dictates |
| | Dell | e7450 | 3846601700001 | i5 | 5th | INV dictates | INV dictates |
| | Dell | e7450 | 3747761300005 | i5 | 5th | INV dictates | INV dictates |
| | Dell | e7450 | 3736622100002 | i7 | 5th | INV dictates | INV dictates |
| | Dell | e7450 | 3857196200003 | i7 | 5th | INV dictates | INV dictates |
| | Dell | e7450 | 3915441100027 | i7 | 5th | INV dictates | INV dictates |
| | Dell | e7450 | 3779656300008 | | 5th | INV dictates | INV dictates |
| | Dell | e5470 | 74w4r72 | i7 | 6th | INV dictates | INV dictates |
| | Dell | E5470 | 4v3rm72 | i7 | 6th | INV dictates | INV dictates |

APPENDIX 14

Excerpts of email exchanges between Wajahat Memon of WT World Trading, Inc. and Tom Hill of Tech Resale

After the second shipment of unacceptable electronic equipment on August 25, 2021 (Invoice #21090), intended to rectify problems with earlier shipment (Invoice # 21058), the following emails were apparently exchanged between Wajahat Memon of WT World Trading, Inc. and Tom Hill of Tech Resale, according to Mr. Memon.

e-Mails in Chronological order:

Sept 11, 2021: email from Wajahat Memon to Tom Hill, subject line: "Re: Invoice 21090.....remainder final". Broker is very unhappy with the 2nd shipment, stating he would fly to Utah from United Arab Emirates to seek resolution:

"hi tom,

now order not deliver and not proper response about my shipment i paid u in part like 123120\$

we need to cancel also i got big trouble in yours last shipment noted if today i cannot get yours final response in return here then i should have to fly to utha to yours location and u are responsible for every thing i am losing right now because for yours miss commitment i am very fair and honest with u but i dont know why this trouble ??????????????????????????????????????"

"i need my money back now"

Oct 1, 2021: Email from Wajahat to Tom Hill, "**Subject:** Re: Invoice 21090.....remainder final.....garbage not according we bought in the against invoice no 21090":

"Hi Tom,

I got this shipment it's not worth u load as per our commitments invoice no 21090 i never bought from u this load and u loaded my customer is not accepting this garbage and return u send me now this load noted this liability on u noted

i paid u 123000\$

airfreight 12500\$

and custom taxes 24000\$

total liabilities on u in the against of invoice no 21090"

Oct 5, 2021: email from WTWT to Tom Hill, indicating he is now in Utah in order to settle ("sattel") the dispute after the 2nd shipment (Aug '21) of scrap computers. Wajahat spent a month living in a hotel in Utah, waiting for resolution:

"Hi Tom,

I am here because of trouble according to u and u fire yours employees did a lot wrong with u and i got totally mess that we committed in the invoice i never got as per our commitments and i fly for u almost 24 hours from uae because of u u told me u will sort and Sattel but what can i do my customers cancel this big orders and now he wants his money back i don't always u say on the call u will handle and sort and Sattel i don't know how to

manage this situation i don't want to problems create for u and not problems for me so get me refund asap and we can wrap this chapter as u told me u are Buzzi tomorrow but i will be staying in cedar city tomorrow and waiting for u as per our phone conversation

i cannot get to my pressure with my customers now old customer is on my top of head too

in the mean while if u have any questions pls email me

thanks

best regards"

Oct 5th, 2021: Tom Hill acknowledges problems with the shipment(s), offers to "come up with a solution", and asks WTWT for an 'audit' (spreadsheet of each device) with 'just the basic' information on each device:

"I don't understand what you're saying, are you saying he wants to return the order? I need to discuss the details with you when you arrive.

We'll discuss it when I get back to Cedar at around 530pm but there's always options to solve these things. We'll discuss them when we meet up. Did you send the audit on what he got? I was speaking to some people to find out what happened during that time. We have 3 different big things happening and I have 2 people and 2 temps. Only 1 of my guys knows this stuff well but even he is learning. 2nd guy is OK but needs more experience and temps, well they are temps. They can just pack stuff, they aren't good for anything but manual labor.

Anyways we will discuss this and come up with a solution. And as far as resolving the first deal yes I want to address that. Did you get the audit from it? There is a big concern I have there. Honestly Wally I can't tell you I recall a time when I sold iseries and had someone say they got c2d, let alone how many you reported, but with the serial numbers I can tie them back to that order and even who did the units intake. So I definitely need to see those. That is a big big issue for me I need to see how that could've happened. Also I need to know on broken screen, how many were visually broken and how many needed to be turned on to be visible? Those are a few big questions I have on the first deal anyways.

Oct 10, 2021: email from Wajahat to Tom Hill:

"All further pictures send u on Bussniess what's up also attached to your paperwork that u want to given adjustments final dead line is Tuesday noted otherwise want money back noted"

123000\$ paid u

Customs tax 24000\$

12500\$ air freight

Total 159000\$ liability on tech resale like tom

I am tyired with this story"

Oct 26, 2021 wajahat_wahid@hotmail.com> wrote to Tom Hill:

"All paperwork here I don't want yours garbage material I want my money back when r u refunding me feedback via email now

All paperwork attached"

Oct 27, 2021: Tom Hill is frustrated with "70 calls and messages over 4 hrs last night", and says it must stop. But also says,

"...It was simple, you got material that wasn't correct. Instead of providing me a list of what you received with some sort of a breakdown on what was in specification and what was not in specification you fly out here and allege all these issues, which sure I can see something happened but as I looked more into this and the fact there has been no actual audit provided. Something as simple as

Make/Model/Serial (In Spec)

Make/Model/Serial (Issue: Not in Spec/Broken Screen/Missing CPU/1st Gen/2nd Gen/3rd Gen)

If the unit didn't have a serial number there could be a barcode tag or other identifying mark.

And pictures were great but there needs to be context. So what if a temp packed up the wrong thing, it happens."

"...I want the information because I have already provided equipment and money based on the claims and I know there is so much going on I can see where things can happen. If I was ripping you off I'd just send you trash. But I want the information and then I will decide what to do. I won't be under any deadline to do anything.

Oct 28, 2021: After Wajahat asks again (on Oct 27th) what specifications Tom Hill wants in the 'audit' of the shipment, Tom writes back saying:

"To confirm I just want the basic details, no power testing or anything. I will send a spreadsheet that they can use, it's super easy but I need to get back to a computer in 2-3hrs and I'll send it. It will give you some clear examples of what I suspect are the different types."

Nov 2, 2021: Wajahat emails Tom, "**Subject:** Re: Re[3]: Invoice 21090.....remainder final.....garbage not according we bought in the against invoice no 21090", promising to get spreadsheet to him soon:

"what hi tom in google sheet we saw yours again what u required my guys working according to yours again required claim list and hope this week will get back to you

thanks,

Memon"

Nov 11, 2021: Memon Wajahat sends Tom Hill email (likely with help from a colleague with better English), "**Subject:** Re: Re[3]: Invoice 21090.....remainder final.....garbage not according we bought in the against invoice no 21090":

"Hello,

Hope all is well after the extensive exercise of my team members we prepared the spreadsheet with all the information you needed find attached file of 1349 laptops units we received. Also find link below for pictures of laptops in broken condition.

<https://drive.google.com/folderview?id=1YOn4uTYJU4Iq-3atCZLHRkFitqbBGab->

Now I need to know how much more time you need to settlement on this dispute because I need to justify and face my partners/customers. Hope you will understand and realize my pressure.

The reason for calling/texting you in recent past after this shipment I was under immense pressure because as per the attached invoice and commitment from your end we received entirely opposite products that's why I fly for you and try to secure my investment which has been done in advance, good-faith, and to have term business relationship with you but I am very disappointed after receiving your email in which you wrote for me to threaten you.

During my visit to you, i really thankful for the hospitality and behaviour you have for me and you give me your handwritten note (File attached) and ensure me to settle this claim.


Well, my concern is very simple please do the needful & create some WIN-WIN situation for both of us.

Hope you will not find this email as " THREAT" and reply positively with the formula of my claim settlement. "

APPENDIX 15

Tech Resale's Corrective Action Report from an internal audit

Apparently, TR's internal audit indicated that TR did not fully disclose testing results on all sales transactions sampled during the audit. The correction (listing 'testing actions') does not appear to fully address the non-conformities with section 8.5.2 C of the Standard.



Corrective Action Report

SECTION I – NONCONFORMANCE (to be Completed by Originator)

Source of NC: ☒ Internal Audit
☐ Internal Observation
☐ External Audit or Observation

CAR #:NC-04
Report Date: 3-10-2022
Originator's Signature: Henry Hill

Tech Resale did not fully disclose testing results on all sales transactions sampled during the audit. Most samples reviewed had test results documented

Requirement: (reference specific requirement, including reference document, standard and clause number, if applicable)

e-Stewards 4.0; 8.5.2 C; The Organization shall retain identifying information for each item of Electronic Equipment (including components) destined for reuse. Identifying information shall include: Type of testing and, if applicable, data sanitization performed on each device or separate component; c) Results of tests performed, including: 1) An accurate representation of the condition of the device or component (including cosmetic condition and battery status); and 2) A description of missing components (if applicable);

SECTION II –ASSIGNED TO: (to be Completed by Management Representative)

Assigned To: Henry Hill

Correction Due Date (Immediate):3-14-2022

Correction: (e.g. immediate fix to prevent further harm):

Update Inventory tracking documentation to the system to require listing of testing actions used on each line item and not just in our internal systems. Produce a final inventory that includes this information.