

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**ADMINISTRATIVE PROCEEDING**  
**FILE No. 3-21032**

**In the Matter of the Registration  
Statement of**

**ELECTROPREMIUM,**

**Respondent.**

**DECLARATION OF JOSHUA D. TANNEN**

I, Joshua D. Tannen, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a Counsel with the United States Securities and Exchange Commission (the “Commission”), and I represent the Commission’s Division of Enforcement (“Division”) in this proceeding.

2. I submit this declaration in support of the Division’s Brief in Opposition to Respondent’s Petition for Review from Initial Decision, submitted concurrently herewith, regarding the August 18, 2022 Form S-1 registration statement (“Registration Statement”) of Respondent ELECTROPREMIUM (“Respondent” or “Electropremium”).

3. I base this declaration both on my personal knowledge and my review of the records, including filings that the Division made in this matter.

4. On September 6, 2022, the Commission instituted this proceeding by filing an Order Instituting Proceedings (“OIP”). I have attached to this Declaration as “Exhibit A” a true and correct copy of the OIP.

5. On September 21, 2022, ALJ Carol Fox Foelak held the hearing in this proceeding.

The Division attended remotely via Webex. Respondent did not attend. I have attached to this Declaration as “Exhibit B” a true and correct copy of the transcript of the September 21 Hearing. The Division presented four exhibits at the hearing. I have attached true and correct copies of those exhibits to this Declaration as “Exhibit C” (the Registration Statement), “Exhibit D” (an image showing the history of Respondent’s EDGAR filings), “Exhibit E” (an August 26, 2022 letter from the Division of Corporation Finance to Respondent identifying serious deficiencies in the Registration Statement), and “Exhibit F” (a September 19, 2022 letter from Respondent that was filed on EDGAR and that requested acceleration of the effectiveness of the Registration Statement despite the institution of the stop order proceeding and the upcoming hearing).

6. After the close of the hearing, Mr. Khurram Afzal, Respondent’s CEO, called Division staff and claimed that, even though he had received the email invitation, he had not attended the hearing because, among other reasons, he apparently believed it had been scheduled for 10:00 a.m. PDT rather than EDT. ALJ Foelak then issued an order setting a post-hearing briefing schedule and permitting Respondent to file a post-hearing Answer. I have attached to this Declaration as “Exhibit G” a true and correct copy of this order.

7. On October 4, 2022, Respondent filed an Answer. I have attached to this Declaration as “Exhibit H” a true and correct copy of this Answer.

8. On October 12, 2022, the day the Division filed its post-hearing brief, Respondent filed an application to withdraw the Registration Statement, which the Commission denied on October 26, 2022. I have attached to this Declaration as “Exhibit I” a true and correct copy of that order.

9. On December 6, 2022, ALJ Foelak issued the Initial Decision and stop order suspending the effectiveness of the Registration Statement. I have attached to this Declaration as

“Exhibit J” a true and correct copy of the Initial Decision.

10. On December 8, 2022, Respondent filed a petition for review of the Initial Decision by the Commission. I have attached to this Declaration as “Exhibit K” a true and correct copy of that petition.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 20, 2023  
New York, NY

/s/ Joshua D. Tannen  
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