

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION**

HW PREMIUM CBD, LLC,
AJ's HEALTH AND WELLNESS d/b/a
AMERICAN SHAMAN, E. KRIEGER
LAND, LLC d/b/a GREENE GOODS
MARKET & GREENHOUSES, GREEN
ONYX INC. d/b/a YOUR CBD STORE,
BEYOND CBD, LLC d/b/a BEYOND CBD,
CAMPBELL'S NUTRITION CENTERS,
INC., TCI ENTERPRISE, INC. d/b/a SKY
HIGH, ICANNA, LLC, YOUR CBD STORES
FRANCHISING LLC

Case No. 4:24-cv-00210-SHL-HCA

Plaintiffs,

v.

GOVERNOR KIM REYNOLDS in her official
capacity, DIRECTOR OF IOWA
DEPARTMENT OF HEALTH AND HUMAN
SERVICES KELLY GARCIA in her official capacity,
COMMISSIONER OF IOWA DEPARTMENT OF
PUBLIC SAFETY STEPHAN BAYES in his official
capacity, and IOWA SECRETARY OF AGRICULTURE
MIKE NAIG in his official capacity.

Defendants.

AMENDED AND SUPPLEMENTAL DECLARATION OF LACIE NAVIN

I, Lacie Navin, do hereby attest as follows:

1. I am over the age of majority, am competent to testify, and I have personal knowledge of the matters addressed in this declaration.

2. This Declaration is submitted in support of Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction.

3. I am the owner of two separate stores that sell products that Iowa has defined as “consumable hemp products,” and have operated as co-owner of two additional stores within Iowa as well.

4. I operate each one of my stores as a franchise of Sunmed™ Your CBD Store, which is a national franchise that specializes in cannabidiol (“CBD”) products. My first store that I opened in 2019 is located in West Des Moines, Iowa. My second store that I opened is located in Ankeny, Iowa. The two stores that I own a fifty percent (50%) interest in are also Sunmed™ franchises and are both located in Iowa.

5. The stores I operate are both licensed and registered with the Iowa Department of Health and Human Services (“DHHS”), and the consumable hemp products sold in those stores are currently approved by DHHS.

6. In December of 2019, I was contacted by an undercover police officer who purchased some of my product from my Sunmed™ Ankeny, Iowa store. I ultimately was arrested and charged with multiple felonies for allegations that my products were “marijuana prepared,” which was a phrase that I understand Iowa did not define. As part of the investigation, my bank accounts were frozen and I was forced to shut down the entirety of my two stores that existed for the entirety of the investigation and court proceeding, which lasted nearly two (2) years. Ultimately, all charges against me were voluntarily dismissed by the State of Iowa, but the damage to me financially was substantial as the State did not return any of the money that was frozen, and I had lost revenue for the two-year period that I was shut down.

7. The two-year period of litigation was extremely detrimental to me, my business, and my family that I was trying to financially support. Since opening my businesses in 2019, I have followed every law – local, state, and federal – concerning the products that I offer for sale

in my stores.

8. I have owned my businesses throughout the transition in Iowa from the time the Agriculture Farm Improvement Act (the “2018 Farm Bill”) was passed to allow for the industrialization and possession of hemp and hemp-derived products, to the first Iowa bill that was passed to mirror the 2018 Farm Bill in 2019 (the “Iowa Hemp Act”), and then subsequently the second Iowa hemp bill passed in 2020 that provided for the legalization and regulation of “consumable hemp products” (H.F. 2581).

9. It is my understanding that there are very few Iowa licensed hemp growers within the State of Iowa.

My Store Products Sold Within Iowa

10. I entered into a Franchise Agreement for my stores on October 5, 2021 with Your CBD Stores Franchising, LLC. The Franchising Agreement has an initial term of five (5) years, with option to renew thereafter.

11. Because of the Franchise Agreement, I am restricted on what products I can offer in my stores and predominantly carry Sunmed™ products.

12. Sunmed™ offers a variety of products that are sold within my stores. In addition, I am one of very few stores that sells an Iowa-derived CBD tincture product that is manufactured by a local Iowa grower.

13. The majority of the product line that I sell in my Iowa stores are Sunmed™ products. Sunmed™ produces approximately sixty-four (64) products that are lab tested and third-party approved for quality assurance purposes. Each product has its own lab report published on the Sunmed™ website, available for any customer who wishes to see specific information about the safety of the product, as well as THC content.

14. For example, the full spectrum neuro water soluble CBD gummies sold in a container that contains 30 gummies, carry a .0145% total THC per serving (1 gummy) and .4591% total CBD per serving. The lab report prepared by ActLab is published on the website, a copy of which is attached hereto as Exhibit “1” to my Declaration and is a business record that I maintain and offer to my customers upon request in accordance with my ordinary course of business.

15. An additional example is our 1800 mg water soluble CBD tincture. That container has 19.282 mg of THC per package, but only .643 mg of THC per unit. Because of the size of the container, it is my understanding that this product would violate the laws set to take effect in Iowa on July 1, 2024 (the “Amendments”). A copy of the tincture lab report is attached hereto as Exhibit “2” to my Declaration and is a business record that I maintain and offer to my customers upon request in accordance with my ordinary course of business.

16. I also am one of the very few licensed consumable hemp retailers in Iowa that is authorized to sell raw hemp flower. A copy of the Certificate of Analysis that I carry in my store in order to sell this flower I receive from Sunmed is attached hereto as Exhibit “3” to my Declaration and is a business record that I maintain and offer to my customers upon request in accordance with my ordinary course of business. The Exhibit “3” I previously submitted was submitted in error, as it is a tincture product, and should be superseded and replaced with this Exhibit “3” as the accurate product described here.

17. All of the products I sell in my stores are approved by the Iowa DHHS under my consumable hemp retailer license, a copy of which is attached as Exhibit “4” to my Declaration and is a business record that I maintain and post for public view within my stores.

Impact on My Business and Irreparable Harm

18. The Amendments were signed into law by Defendant Reynolds on May 17, 2024

through H.F. 2605 and H.F. 2641 and are set to take effect a mere six weeks later on July 1, 2024.

19. On February 14, 2024, I signed a five-year commercial lease for my 1,400 square foot business in Ankeny, Iowa, with payments set to commence in May 2024.

20. If the Amendments go into effect on July 1, 2024, as planned, I have conservatively estimated that approximately 75% of my current product line that is currently offered for sale *legally* in Iowa will not comply with the Iowa Amendments.

21. The products that will be illegalized are largely due to the serving size and container size requirements that are set forth in HF 2605 definition of a “consumable hemp product” in which “the product’s maximum total tetrahydrocannabinol (“THC”) concentration is less than or equal to the lesser of the following: a) three-tenths of one percent on a dry weight basis; b) four milligrams per serving and ten milligrams per container on a dry weight basis.”

22. The phrases “per serving” and “per container” are vague as there has been no definition or regulation issued that defines what “serving” or “container” means in this context, as my store sells a variety of products that are both liquid and solid with a variety of different serving sizes. The lack of regulations or guidance on these two words also contribute to my concerns that the products I currently have in inventory and future products that I am required to purchase per my Franchise Agreement will not be in compliance with the new Amendments.

23. In addition, within the Amendments in ICA § 204.14A (Criminal offense-inhalation), a person “shall not manufacture, produce, distribute, market, or sell a *synthetic consumable hemp product*, as defined by rules adopted by the department of health and human services.”

24. A synthetic consumable hemp product is not defined in the Amendments, and the rules have not been finalized by the department of health and human services, leading to a large

amount of confusion as to what products fall within the definition of a synthetic consumable hemp product.

25. The products that will be illegalized in my stores as a result of the Amendments (*excluding* any potential products that are considered “synthetic”) will be devastating, as they make up at least 70% or more of my monthly sales in each store.

26. The removal of these products from the Iowa marketplace will be detrimental to the Iowa consumers and public. Both of my stores service at *least* in excess of 12,000 customers.

27. The removal of these products will make the continuation of my business impossible, as the Sunmed™ brand currently only carries approximately 40 products that would be considered compliant with the Amendments. It is my understanding that Sunmed™ will not create separate products that are compliant with only Iowa’s law, as doing so for potentially all 50 states would be incredibly burdensome and costly to comply with.

28. Because of the Franchise Agreement, I am restricted on what products I can offer in my stores and am required to purchase a minimum inventory of Sunflora products that are manufactured by Sunmed™ on a quarterly basis.

29. As a result, the Amendments will effectively prohibit me from purchasing the Sunflora products that I am required to purchase on a quarterly basis, directly interfering with my ability to comply with my Franchise Agreement as I understand it will be illegal for me to purchase the Sunflora products in Iowa under the Amendments.

30. Because of the effective date of the Amendments being a mere six weeks after the Governor signed them into law, coupled with the fact the industry stakeholders like myself do not have final regulations to fully understand how the Department of Health & Human Services and

Department of Public Safety intend to enforce the Amendments, we are left not knowing what to do with the substantial amount of product currently on our shelves.

31. The risk of criminal enforcement as a result of the Iowa Amendments is incredibly concerning, especially in light of my prior experience and exceptional financial harm that was inflicted on me as a result of a criminal investigation and shutting down of my business as a result. I have a young family and cannot risk criminal enforcement and financial harm as a result of the State pursuing enforcement of the Amendments.

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

Executed this 29th day of June 2024.

DocuSigned by:

6DFAC86C1B6C44B...
Lacie Navin



EXHIBIT
1



SunFlora Inc.
Order #: 84654
Retail Batch #:
112523FSNG

CERTIFICATE OF ANALYSIS
ISO/IEC: 17025:2017 Accreditation #:
103104
License #: CMTL-0004

Order Information

Order #: 84654
Order Name: Neuro Gummy
Retail Batch #: 112523FSNG
Received: 12/01/2023 13:27:49
Complete: 12/08/2023 10:45:26

Batch Information

Create Date: Total Qty.: 0
Exp. Date: Matrix: Gummy
Size: 0 Pickup Weight: N/A

CANNABINOID PROFILE
TESTED

LABEL CLAIM
NOT APPLICABLE

MICROBIAL ANALYSIS
PASS

RESIDUAL SOLVENTS
PASS

AGRICULTURAL AGENTS
PASS

HEAVY METAL ANALYSIS
PASS

TERPENES TOTAL
TESTED

MOISTURE ANALYSIS
NOT TESTED

WATER ACTIVITY
TESTED

FILTH & FOREIGN MATERIAL ANALYSIS
PASS

HOMOGENEITY
NOT TESTED

MYCOTOXIN ANALYSIS
PASS



0.0145 %
Total THC

0.4591 %
Total CBD

0.7966 %
Total Cannabinoids

Diana Asensio, M.S.

Lab Director

ACT Laboratories Florida
4001 SW 47th Avenue, Suite 208
Davie, FL 33314
(954) 514-9343





SunFlora Inc.
 Order #: 84654
 Retail Batch #:
 112523FSNG

CERTIFICATE OF ANALYSIS
 ISO/IEC: 17025:2017 Accreditation #:
 103104
 License #: CMTL-0004

Sample Prep

Tech: 4090
 SOP: 418
 Batch Number: 61912
 Batch Date: 12/01/2023 12:21:23

Sample Analysis

Date/Time: 12/05/2023 08:56:09
 Tech: 1012
 SOP: 417
 Final Weight: 1.0054 g
 Volume: 10 ml

CANNABINOID PROFILE

HPLC-DAD

0.0145 % Total THC	0.728 mg THC Per Unit	0.728 mg THC Per Pkg
0.4591 % Total CBD	23.047 mg CBD Per Unit	23.047 mg CBD Per Pkg
0.7966 % Total Cannabinoids	39.990 mg Cannabinoids Per Unit	39.990 mg Cannabinoids Per Pkg

Cannabinoid Potency

ANALYTE	LOD/LOQ (mg/g)	DIL.	WEIGHT %	MG/G	MG/UNIT	MG/PACKAGE	LABEL CLAIM (mg)	% LABEL VAR.
CBC	0.004/0.013	1	0.0067	0.067	0.336	0.336	--	--
CBD	0.004/0.013	1	0.4591	4.591	23.047	23.047	--	--
CBDA	0.004/0.013	1	ND	ND	ND	ND	--	--
CBDV	0.004/0.013	1	0.0033	0.033	0.166	0.166	--	--
CBG	0.004/0.013	1	0.2927	2.927	14.694	14.694	--	--
CBGA	0.004/0.013	1	ND	ND	ND	ND	--	--
CBN	0.004/0.013	1	0.0037	0.037	0.186	0.186	--	--
d8-THC	0.004/0.013	1	ND	ND	ND	ND	--	--
d9-THC	0.004/0.013	1	0.0145	0.145	0.728	0.728	--	--
THCA	0.004/0.013	1	ND	ND	ND	ND	--	--
THCV	0.004/0.013	1	ND	ND	ND	ND	--	--

Additional Cannabinoids

ANALYTE	LOD/LOQ (mg/g)	DIL.	WEIGHT %	MG/G	MG/UNIT	MG/PACKAGE	LABEL CLAIM (mg)	% LABEL VAR.
CBDVA	0.004/0.013	1	ND	ND	ND	ND	--	--
CBL	0.004/0.013	1	<LOQ	<LOQ	<LOQ	<LOQ	--	--
CBT	0.004/0.013	1	0.0166	0.166	0.833	0.833	--	--
d10-THC	0.004/0.013	1	ND	ND	ND	ND	--	--
d9-THCP	0.004/0.013	1	ND	ND	ND	ND	--	--
exo-THC	0.004/0.013	1	ND	ND	ND	ND	--	--

mg/unit = 5.02 (g) per unit x cannabinoid concentration (mg/g)
 Total THC = THC + (0.877 x THCA) and Total CBD = CBD + (0.877 x CBDA)
 ND = Not Detected, NT = Not Tested, <LOQ = Below Limit of Quantitation

CANNABINOID TOTALS	WEIGHT %	MG/G	MG/UNIT	MG/PACKAGE
Total THC	0.0145	0.145	0.728	0.728
Total CBD	0.4591	4.591	23.047	23.047
Total Cannabinoids	0.7966	7.966	39.990	39.990

Diana Asensio, M.S.

Lab Director

ACT Laboratories Florida
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SunFlora Inc.
 Order #: 84654
 Retail Batch #:
 112523FSNG

CERTIFICATE OF ANALYSIS

ISO/IEC: 17025:2017 Accreditation #: 103104
 License #: CMTL-0004

Agricultural Agents

GC-MS/MS

PASS

Sample Prep

Tech: 3393
 SOP: 402
 Batch Number: 61925
 Batch Date: 12/04/2023 15:13:41

Sample Analysis

Date/Time: 12/06/2023 11:55:52
 Tech: 2816
 SOP: 402
 Final Weight: 0.5124 g
 Volume: 10 ml

ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LEVEL (ppm)	RESULTS (ppm)
Captan	0.07/0.1	1	3	ND
Chlordane	0.01/0.1	1	0.1	ND
Chlorfenapyr	0.01/0.1	1	0.1	ND
Coumaphos	0.01/0.1	1	0.1	ND
Cyfluthrin	0.01/0.1	1	1	ND
Cypermethrin	0.01/0.1	1	1	ND
Methyl parathion	0.01/0.1	1	0.1	ND
Pentachloronitrobenzene	0.01/0.1	1	0.2	ND

MYCOTOXIN ANALYSIS

LC-MS/MS

PASS

Sample Prep

Tech: 3393
 SOP: 432
 Batch Number: 61924
 Batch Date: 12/04/2023 14:46:55

Sample Analysis

Date/Time: 12/07/2023 12:59:06
 Tech: 3445
 SOP: 424
 Final Weight: 0.105 g
 Volume: 2.5 ml

ANALYTE	LOD/LOQ (ppb)	DIL.	ACTION LEVEL (ppb)	RESULTS (ppb)
Aflatoxin B1	2/10	1	20	ND
Aflatoxin B2	2/10	1	20	ND
Aflatoxin G1	2/10	1	20	ND
Aflatoxin G2	2/5	1	20	ND
Ochratoxin A	2/10	1	20	ND

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Agricultural Agents

LC-MS/MS

PASS

Sample Prep

Tech: 3393
 SOP: 432
 Batch Number: 61924
 Batch Date: 12/04/2023 14:46:55

Sample Analysis

Date/Time: 12/07/2023 12:59:06
 Tech: 3445
 SOP: 424
 Final Weight: 0.105 g
 Volume: 2.5 ml

ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LEVEL(ppm)	RESULTS (ppm)	ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LIMIT(ppm)	RESULTS (ppm)
Abamectin B1a	0.002/0.035	1	0.3	ND	Imazalil	0.002/0.01	1	0.1	ND
Acephate	0.002/0.04	1	3	ND	Imidacloprid	0.002/0.002	1	3	ND
Acequinocyl	0.002/0.002	1	2	ND	Kresoxim-methyl	0.002/0.002	1	1	ND
Acetamiprid	0.002/0.002	1	3	ND	Malathion	0.01/0.04	1	2	ND
Aldicarb	0.002/0.01	1	0.1	ND	Metalaxyl	0.002/0.004	1	3	ND
Azoxystrobin	0.002/0.04	1	3	ND	Methiocarb	0.002/0.01	1	0.1	ND
Bifenazate	0.002/0.002	1	3	ND	Methomyl	0.002/0.002	1	0.1	ND
Bifenthrin	0.002/0.002	1	0.5	ND	Mevinphos	0.009/0.036	1	0.1	ND
Boscalid	0.01/0.05	1	3	ND	Myclobutanil	0.002/0.04	1	3	ND
Carbaryl	0.002/0.004	1	0.5	ND	Naled	0.002/0.01	1	0.5	ND
Carbofuran	0.002/0.01	1	0.1	ND	Oxamyl	0.002/0.002	1	0.5	ND
Chlorantraniliprole	0.002/0.01	1	3	ND	Pactlobutrazol	0.002/0.004	1	0.1	ND
Chlormequat chloride	0.002/0.004	1	3	ND	Permethrins	0.002/0.01	1	1	ND
Chlorpyrifos	0.002/0.01	1	0.1	ND	Phosmet	0.002/0.002	1	0.2	ND
Clofentezine	0.002/0.002	1	0.5	ND	Piperonyl Butoxide	0.002/0.002	1	3	ND
Daminozide	0.01/0.04	1	0.1	ND	Prallethrin	0.002/0.01	1	0.4	ND
Diazinon	0.002/0.01	1	0.2	ND	Propiconazole	0.002/0.04	1	1	ND
Dichlorvos	0.002/0.04	1	0.1	ND	Propoxur	0.002/0.01	1	0.1	ND
Dimethoate	0.002/0.002	1	0.1	ND	Pyrethrins	0.001/0.013	1	1	ND
Dimethomorph	0.001/0.002	1	3	ND	Pyridaben	0.002/0.002	1	3	ND
Ethoprophos	0.002/0.01	1	0.1	ND	Spinetoram	0.001/0.003	1	3	ND
Etofenprox	0.002/0.002	1	0.1	ND	Spinosad	0.001/0.001	1	3	ND
Etoxazole	0.002/0.002	1	1.5	ND	Spiromesifen	0.002/0.002	1	3	ND
Fenhexamid	0.01/0.04	1	3	ND	Spirotetramat	0.002/0.01	1	3	ND
Fenoxycarb	0.002/0.004	1	0.1	ND	Spiroxamine	0.002/0.04	1	0.1	ND
Fenpyroximate	0.002/0.002	1	2	ND	Tebuconazole	0.01/0.04	1	1	ND
Fipronil	0.002/0.004	1	0.1	ND	Thiacloprid	0.002/0.002	1	0.1	ND
Flonicamid	0.002/0.01	1	2	ND	Thiamethoxam	0.002/0.01	1	1	ND
Fludioxonil	0.002/0.004	1	3	ND	Trifloxystrobin	0.002/0.002	1	3	ND
Hexythiazox	0.002/0.004	1	2	ND					

Diana Asensio, M.S.

Lab Director

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SunFlora Inc.
 Order #: 84654
 Retail Batch #:
 112523FSNG

CERTIFICATE OF ANALYSIS

ISO/IEC: 17025:2017 Accreditation #:
 103104
 License #: CMTL-0004

TERPENES TOTAL
 GC-FID **TESTED (0.000 %)**

Sample Prep

Tech: 3393
 SOP: 421
 Batch Number: 61923
 Batch Date: 12/04/2023 14:38:40

Sample Analysis

Date/Time: 12/08/2023 09:32:52
 Tech: 2816
 SOP: 419
 Final Weight: 0.4069 g
 Volume: 10 ml

TERPENE	LOD/LOQ (%)	DIL.	RESULTS (%)	TERPENE	LOD/LOQ (%)	DIL.	RESULTS (%)
3-Carene	0.001/0.003	1	ND	Geraniol	0.001/0.003	1	ND
alpha-Bisobolol	0.001/0.003	1	<LOQ	Geranyl acetate	0.001/0.003	1	ND
alpha-Cedrene	0.001/0.003	1	ND	Guaiol	0.001/0.003	1	ND
alpha-Humulene	0.001/0.003	1	ND	Hexahydrothymol	0.001/0.003	1	ND
alpha-Pinene	0.001/0.003	1	ND	Isoborneol	0.001/0.003	1	ND
alpha-Terpinene	0.001/0.003	1	ND	Isopulegol	0.001/0.003	1	ND
beta-Myrcene	0.001/0.003	1	ND	Limonene	0.001/0.003	1	ND
beta-Pinene	0.001/0.003	1	ND	Linalool	0.001/0.003	1	ND
Borneol	0.001/0.003	1	<LOQ	Nerol	0.001/0.003	1	ND
Camphene	0.001/0.003	1	ND	p-Mentha-1,5-diene	0.001/0.003	1	ND
Camphor	0.001/0.003	1	ND	Pulegone	0.001/0.003	1	ND
Caryophyllene oxide	0.001/0.003	1	ND	Sabinene hydrate	0.001/0.003	1	ND
Cedrol	0.001/0.003	1	ND	Terpineol	0.001/0.003	1	ND
cis-Nerolidol	0.001/0.003	1	ND	Terpinolene	0.001/0.003	1	ND
cis-Ocimene	0.001/0.003	1	ND	trans-Caryophyllene	0.001/0.003	1	ND
Eucalyptol	0.001/0.003	1	ND	trans-Nerolidol	0.001/0.003	1	ND
Fenchone	0.001/0.003	1	ND	trans-Ocimene	0.001/0.003	1	ND
Fenchyl alcohol	0.001/0.003	1	ND	Valencene	0.001/0.003	1	ND
gamma-Terpinene	0.001/0.003	1	ND				

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SunFlora Inc.
 Order #: 84654
 Retail Batch #:
 112523FSNG

CERTIFICATE OF ANALYSIS
 ISO/IEC: 17025:2017 Accreditation #:
 103104
 License #: CMTL-0004

RESIDUAL SOLVENTS

HS-GC-MS

PASS

Sample Prep

Tech: 2816
 SOP: 405
 Batch Number: 61935
 Batch Date: 12/06/2023 16:34:44

Sample Analysis

Date/Time: 12/07/2023 15:57:17
 Tech: 2816
 SOP: 405
 Final Weight: 0.0485 g
 Volume: 1 ml

ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LIMIT (ppm)	RESULTS (ppm)	ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LIMIT (ppm)	RESULTS (ppm)
1,1-Dichloroethene	0.6/0.63	1	8	ND	Heptane	6/140	1	5000	ND
1,2-Dichloroethane	0.012/0.12	1	2	ND	Hexanes	0.06/18	1	250	ND
Acetone	9/140	1	750	ND	Isopropyl alcohol	3/140	1	500	<LOQ
Acetonitrile	0.72/25	1	60	ND	Methanol	6/100	1	250	<LOQ
Benzene	0.06/1	1	1	ND	Methylene chloride	1.5/1.5	1	125	ND
Butane	48/50	1	5000	ND	Pentane	9/140	1	750	ND
Chloroform	0.2/1	1	2	ND	Propane	30/30	1	5000	ND
Ethanol	12/140	1	5000	<LOQ	Toluene	0.9/53	1	150	ND
Ethyl acetate	2.4/140	1	400	ND	Total xylenes	1.8/130	1	150	ND
Ethyl ether	6/140	1	500	ND	Trichloroethylene	0.3/1	1	25	ND
Ethylene oxide	0.6/2	1	5	ND					

HEAVY METAL ANALYSIS

ICP-MS

PASS

Sample Prep

Tech: 3396
 SOP: 428
 Batch Number: 61932
 Batch Date: 12/06/2023 10:23:57

Sample Analysis

Date/Time: 12/06/2023 14:05:56
 Tech: 3396
 SOP: 428
 Final Weight: 0.2311 g
 Volume: 60 ml

ANALYTE	LOD/LOQ (ppb)	DIL.	ACTION LIMIT (ppb)	RESULTS (ppb)
Arsenic	20/75	1	1500	ND
Cadmium	20/75	1	500	ND
Lead	20/75	1	500	ND
Mercury	20/75	1	3000	ND

FILTH & FOREIGN MATERIAL ANALYSIS

Result: **PASS**

Sample Prep and Analysis

Date/Time: 12/05/2023 14:17:46
 Tech: 4090
 SOP: 409
 Final Weight: 114.6 g

Diana Asensio, M.S.

Lab Director

ACT Laboratories Florida
 4001 SW 47th Avenue, Suite 208
 Davie, FL 33314
 (954) 514-9343





SunFlora Inc.
 Order #: 84654
 Retail Batch #:
 112523FSNG

CERTIFICATE OF ANALYSIS
 ISO/IEC: 17025:2017 Accreditation #:
 103104
 License #: CMTL-0004

MICROBIAL ANALYSIS
PASS

Sample Prep

Tech: 3393
 SOP: 406

Batch Number: 61930
 Batch Date: 12/05/2023 12:41:15

Date/Time: 12/06/2023 23:47:01
 Tech: 3571
 SOP: 406

Sample Analysis

Final Weight: 1.0291 g

ANALYTE	TEST METHOD	ALLOWABLE CRITERIA	ACTUAL RESULT	PASS/FAIL
Total yeast and mold	qPCR	NA	NOT DETECTED	PASS

Sample Prep

Tech: 3393
 SOP: 406

Batch Number: 61926
 Batch Date: 12/05/2023 10:47:38

Date/Time: 12/07/2023 16:32:09
 Tech: 3358
 SOP: 406

Sample Analysis

Final Weight: 1.0238 g

ANALYTE	TEST METHOD	ALLOWABLE CRITERIA	ACTUAL RESULT	PASS/FAIL
Pathogenic e. coli	qPCR	NA	NOT DETECTED	PASS

Sample Prep

Tech: 3393
 SOP: 406

Batch Number: 61926
 Batch Date: 12/05/2023 10:47:38

Date/Time: 12/07/2023 16:32:09
 Tech: 3358
 SOP: 406

Sample Analysis

Final Weight: 1.0238 g

ANALYTE	TEST METHOD	ALLOWABLE CRITERIA	ACTUAL RESULT	PASS/FAIL
Aspergillus flavus	qPCR	< 1 CFU/g	NOT DETECTED	PASS
Aspergillus fumigatus	qPCR	< 1 CFU/g	NOT DETECTED	PASS
Aspergillus niger	qPCR	< 1 CFU/g	NOT DETECTED	PASS
Aspergillus terreus	qPCR	< 1 CFU/g	NOT DETECTED	PASS

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SunFlora Inc.
 Order #: 84654
 Retail Batch #:
 112523FSNG

CERTIFICATE OF ANALYSIS
 ISO/IEC: 17025:2017 Accreditation #:
 103104
 License #: CMTL-0004

MICROBIAL ANALYSIS
PASS

Sample Prep

Tech: 3393
 SOP: 406

Batch Number: 61926
 Batch Date: 12/05/2023 10:47:38

Sample Analysis

Date/Time: 12/07/2023 16:32:09
 Tech: 3358
 SOP: 406

Final Weight: 1.0238 g

ANALYTE	TEST METHOD	ALLOWABLE CRITERIA	ACTUAL RESULT	PASS/FAIL
Salmonella	qPCR	< 1 CFU/g	NOT DETECTED	PASS
STEC e. coli	qPCR	< 1 CFU/g	NOT DETECTED	PASS

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SunFlora Inc.
Order #: 84654
Retail Batch #:
112523FSNG

CERTIFICATE OF ANALYSIS

ISO/IEC: 17025:2017 Accreditation #:
103104
License #: CMTL-0004

WATER ACTIVITY

Water Activity Meter
Water: 0.645 Aw

Sample Prep and Analysis

Date/Time: 12/05/2023 14:14:48
Tech: 4090
SOP: 407
Final Weight: 1.0280 g



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EXHIBIT
2



SunFlora Inc.
Order #: 84839
Retail Batch #:
Neuro FS Natural
1800mg Water
Soluble
(1223FSNRO)

CERTIFICATE OF ANALYSIS

ISO/IEC: 17025:2017 Accreditation #: 103104
License #: CMTL-0004

Order Information

Order #: 84839
Order Name: Neuro FS Natural 1800mg Water Soluble (1223FSNRO)
Retail Batch #: Neuro FS Natural 1800mg Water Soluble (1223FSNRO)
Received: 12/27/2023 14:32:27
Complete: 01/02/2024 11:15:07

Batch Information

Create Date: Total Qty.: 0
Exp. Date: Matrix: Tincture
Size: 0 Pickup Weight: N/A

CANNABINOID PROFILE
TESTED

LABEL CLAIM
NOT APPLICABLE

MICROBIAL ANALYSIS
PASS

RESIDUAL SOLVENTS
PASS

AGRICULTURAL AGENTS
PASS

HEAVY METAL ANALYSIS
PASS

TERPENES TOTAL
TESTED

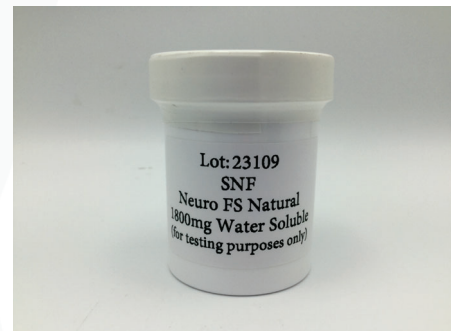
MOISTURE ANALYSIS
NOT TESTED

WATER ACTIVITY
TESTED

FILTH & FOREIGN MATERIAL ANALYSIS
PASS

HOMOGENEITY
NOT TESTED

MYCOTOXIN ANALYSIS
PASS



0.0643 %
Total THC

5.2789 %
Total CBD

5.7968 %
Total Cannabinoids

Diana Asensio, M.S.

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SunFlora Inc.
 Order #: 84839
 Retail Batch #:
 Neuro FS Natural
 1800mg Water
 Soluble
 (1223FSNRO)

CERTIFICATE OF ANALYSIS
 ISO/IEC: 17025:2017 Accreditation #:
 103104
 License #: CMTL-0004

Sample Prep

Tech: 3445
 SOP: 418
 Batch Number: 62037
 Batch Date: 12/26/2023 14:33:06

Sample Analysis

Date/Time: 01/02/2024 11:10:39
 Tech: 3445
 SOP: 417
 Final Weight: 0.2013 g
 Volume: 40 ml

CANNABINOID PROFILE

HPLC-DAD

0.0643 % Total THC	0.643 mg THC Per Unit	19.282 mg THC Per Pkg
5.2789 % Total CBD	52.768 mg CBD Per Unit	1583.037 mg CBD Per Pkg
5.7968 % Total Cannabinoids	57.945 mg Cannabinoids Per Unit	1738.345 mg Cannabinoids Per Pkg

Cannabinoid Potency

ANALYTE	LOD/LOQ (mg/g)	DIL.	WEIGHT %	MG/G	MG/UNIT	MG/PACKAGE	LABEL CLAIM (mg)	% LABEL VAR.
CBC	0.064/0.1954	1	0.0440	0.440	0.440	13.195	--	--
CBD	0.064/0.1954	1	5.2789	52.789	52.768	1583.037	--	--
CBDA	0.064/0.1954	1	ND	ND	ND	ND	--	--
CBDV	0.064/0.1954	1	0.0312	0.312	0.312	9.356	--	--
CBG	0.064/0.1954	1	0.3784	3.784	3.782	113.475	--	--
CBGA	0.064/0.1954	1	ND	ND	ND	ND	--	--
CBN	0.064/0.1954	1	<LOQ	<LOQ	<LOQ	<LOQ	--	--
d8-THC	0.064/0.1954	1	ND	ND	ND	ND	--	--
d9-THC	0.064/0.1954	1	0.0643	0.643	0.643	19.282	--	--
THCA	0.064/0.1954	1	ND	ND	ND	ND	--	--
THCV	0.064/0.1954	1	ND	ND	ND	ND	--	--

mg/unit = 1 (g) per unit x 0.9996 (g/ml) x cannabinoid concentration (mg/g)
 Total THC = THC + (0.877 x THCA) and Total CBD = CBD + (0.877 x CBDA)
 ND = Not Detected, NT = Not Tested, <LOQ = Below Limit of Quantitation

CANNABINOID TOTALS	WEIGHT %	MG/G	MG/UNIT	MG/PACKAGE
Total THC	0.0643	0.643	0.643	19.282
Total CBD	5.2789	52.789	52.768	1583.037
Total Cannabinoids	5.7968	57.968	57.945	1738.345

Diana Asensio, M.S.

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SunFlora Inc.
 Order #: 84839
 Retail Batch #:
 Neuro FS Natural
 1800mg Water
 Soluble
 (1223FSNRO)

CERTIFICATE OF ANALYSIS
 ISO/IEC: 17025:2017 Accreditation #:
 103104
 License #: CMTL-0004

Agricultural Agents

GC-MS/MS

PASS

Sample Prep

Tech: 4090
 SOP: 402
 Batch Number: 62045
 Batch Date: 12/27/2023 14:57:12

Sample Analysis

Date/Time: 01/02/2024 09:43:35
 Tech: 2816
 SOP: 402
 Final Weight: 0.5241 g
 Volume: 10 ml

ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LEVEL (ppm)	RESULTS (ppm)
Captan	0.07/0.1	1	3	ND
Chlordane	0.01/0.1	1	0.1	ND
Chlorfenapyr	0.01/0.1	1	0.1	ND
Coumaphos	0.01/0.1	1	0.1	ND
Cyfluthrin	0.01/0.1	1	1	ND
Cypermethrin	0.01/0.1	1	1	ND
Methyl parathion	0.01/0.1	1	0.1	ND
Pentachloronitrobenzene	0.01/0.1	1	0.2	ND

MYCOTOXIN ANALYSIS

LC-MS/MS

PASS

Sample Prep

Tech: 4090
 SOP: 432
 Batch Number: 62044
 Batch Date: 12/27/2023 14:56:48

Sample Analysis

Date/Time: 01/02/2024 09:36:00
 Tech: 3445
 SOP: 424
 Final Weight: 0.1042 g
 Volume: 2.5 ml

ANALYTE	LOD/LOQ (ppb)	DIL.	ACTION LEVEL (ppb)	RESULTS (ppb)
Aflatoxin B1	2/10	1	20	ND
Aflatoxin B2	2/10	1	20	ND
Aflatoxin G1	2/10	1	20	ND
Aflatoxin G2	2/5	1	20	ND
Ochratoxin A	2/10	1	20	ND

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SunFlora Inc.
 Order #: 84839
 Retail Batch #:
 Neuro FS Natural
 1800mg Water
 Soluble
 (1223FSNRO)

CERTIFICATE OF ANALYSIS

ISO/IEC: 17025:2017 Accreditation #:
 103104
 License #: CMTL-0004

Agricultural Agents

LC-MS/MS

PASS

Sample Prep

Tech: 4090
 SOP: 432
 Batch Number: 62044
 Batch Date: 12/27/2023 14:56:48

Sample Analysis

Date/Time: 01/02/2024 09:36:00
 Tech: 3445
 SOP: 424
 Final Weight: 0.1042 g
 Volume: 2.5 ml

ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LEVEL(ppm)	RESULTS (ppm)	ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LIMIT(ppm)	RESULTS (ppm)
Abamectin B1a	0.002/0.035	1	0.3	ND	Imazalil	0.002/0.01	1	0.1	ND
Acephate	0.002/0.04	1	3	ND	Imidacloprid	0.002/0.002	1	3	ND
Acequinocyl	0.002/0.002	1	2	ND	Kresoxim-methyl	0.002/0.002	1	1	ND
Acetamiprid	0.002/0.002	1	3	ND	Malathion	0.01/0.04	1	2	ND
Aldicarb	0.002/0.01	1	0.1	ND	Metalaxyl	0.002/0.004	1	3	ND
Azoxystrobin	0.002/0.04	1	3	<LOQ	Methiocarb	0.002/0.01	1	0.1	ND
Bifenazate	0.002/0.002	1	3	ND	Methomyl	0.002/0.002	1	0.1	ND
Bifenthrin	0.002/0.002	1	0.5	0.015	Mevinphos	0.009/0.036	1	0.1	ND
Boscalid	0.01/0.05	1	3	ND	Myclobutanil	0.002/0.04	1	3	ND
Carbaryl	0.002/0.004	1	0.5	ND	Naled	0.002/0.01	1	0.5	ND
Carbofuran	0.002/0.01	1	0.1	ND	Oxamyl	0.002/0.002	1	0.5	ND
Chlorantraniliprole	0.002/0.01	1	3	ND	Pactlobutrazol	0.002/0.004	1	0.1	ND
Chlormequat chloride	0.002/0.004	1	3	ND	Permethrins	0.002/0.01	1	1	ND
Chlorpyrifos	0.002/0.01	1	0.1	ND	Phosmet	0.002/0.002	1	0.2	ND
Clofentezine	0.002/0.002	1	0.5	ND	Piperonyl Butoxide	0.002/0.002	1	3	ND
Daminozide	0.01/0.04	1	0.1	ND	Prallethrin	0.002/0.01	1	0.4	ND
Diazinon	0.002/0.01	1	0.2	ND	Propiconazole	0.002/0.04	1	1	ND
Dichlorvos	0.002/0.04	1	0.1	ND	Propoxur	0.002/0.01	1	0.1	ND
Dimethoate	0.002/0.002	1	0.1	ND	Pyrethrins	0.001/0.013	1	1	ND
Dimethomorph	0.001/0.002	1	3	ND	Pyridaben	0.002/0.002	1	3	ND
Ethoprophos	0.002/0.01	1	0.1	ND	Spinetoram	0.001/0.003	1	3	ND
Etofenprox	0.002/0.002	1	0.1	ND	Spinosad	0.001/0.001	1	3	ND
Etoxazole	0.002/0.002	1	1.5	ND	Spiromesifen	0.002/0.002	1	3	ND
Fenhexamid	0.01/0.04	1	3	ND	Spirotetramat	0.002/0.01	1	3	ND
Fenoxycarb	0.002/0.004	1	0.1	ND	Spiroxamine	0.002/0.04	1	0.1	ND
Fenpyroximate	0.002/0.002	1	2	ND	Tebuconazole	0.01/0.04	1	1	ND
Fipronil	0.002/0.004	1	0.1	ND	Thiacloprid	0.002/0.002	1	0.1	ND
Fonicamid	0.002/0.01	1	2	ND	Thiamethoxam	0.002/0.01	1	1	ND
Fludioxonil	0.002/0.004	1	3	ND	Trifloxystrobin	0.002/0.002	1	3	ND
Hexythiazox	0.002/0.004	1	2	ND					

Diana Asensio, M.S.

Lab Director

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SunFlora Inc.
 Order #: 84839
 Retail Batch #:
 Neuro FS Natural
 1800mg Water
 Soluble
 (1223FSNRO)

CERTIFICATE OF ANALYSIS
 ISO/IEC: 17025:2017 Accreditation #:
 103104
 License #: CMTL-0004

TERPENES TOTAL
 GC-FID **TESTED (0.368 %)**

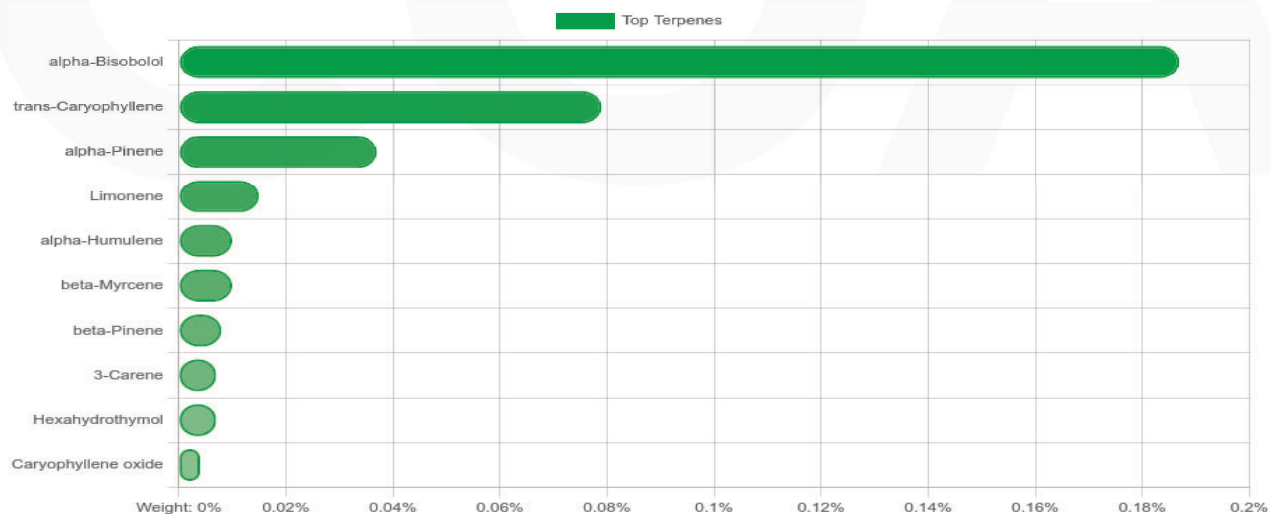
Sample Prep

Tech: 4090
 SOP: 421
 Batch Number: 62033
 Batch Date: 12/26/2023 10:36:24

Sample Analysis

Date/Time: 12/28/2023 09:03:08
 Tech: 2816
 SOP: 419
 Final Weight: 0.4175 g
 Volume: 10 ml

TERPENE	LOD/LOQ (%)	DIL.	RESULTS (%)	TERPENE	LOD/LOQ (%)	DIL.	RESULTS (%)
3-Carene	0.001/0.003	1	0.007	Geraniol	0.001/0.003	1	ND
alpha-Bisobolol	0.001/0.003	1	0.187	Geranyl acetate	0.001/0.003	1	ND
alpha-Cedrene	0.001/0.003	1	ND	Guaiol	0.001/0.003	1	0.004
alpha-Humulene	0.001/0.003	1	0.010	Hexahydrothymol	0.001/0.003	1	0.007
alpha-Pinene	0.001/0.003	1	0.037	Isoborneol	0.001/0.003	1	ND
alpha-Terpinene	0.001/0.003	1	<LOQ	Isopulegol	0.001/0.003	1	ND
beta-Myrcene	0.001/0.003	1	0.010	Limonene	0.001/0.003	1	0.015
beta-Pinene	0.001/0.003	1	0.008	Linalool	0.001/0.003	1	ND
Borneol	0.001/0.003	1	ND	Nerol	0.001/0.003	1	ND
Camphene	0.001/0.003	1	ND	p-Mentha-1,5-diene	0.001/0.003	1	<LOQ
Camphor	0.001/0.003	1	ND	Pulegone	0.001/0.003	1	ND
Caryophyllene oxide	0.001/0.003	1	0.004	Sabinene hydrate	0.001/0.003	1	ND
Cedrol	0.001/0.003	1	ND	Terpineol	0.001/0.003	1	<LOQ
cis-Nerolidol	0.001/0.003	1	ND	Terpinolene	0.001/0.003	1	<LOQ
cis-Ocimene	0.001/0.003	1	ND	trans-Caryophyllene	0.001/0.003	1	0.079
Eucalyptol	0.001/0.003	1	ND	trans-Nerolidol	0.001/0.003	1	ND
Fenchone	0.001/0.003	1	ND	trans-Ocimene	0.001/0.003	1	ND
Fenchyl alcohol	0.001/0.003	1	ND	Valencene	0.001/0.003	1	ND
gamma-Terpinene	0.001/0.003	1	<LOQ				



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 Order #: 84839
 Retail Batch #:
 Neuro FS Natural
 1800mg Water
 Soluble
 (1223FSNRO)

CERTIFICATE OF ANALYSIS
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 103104
 License #: CMTL-0004

RESIDUAL SOLVENTS

HS-GC-MS

PASS

Sample Prep

Tech: 2816
 SOP: 405
 Batch Number: 62049
 Batch Date: 12/27/2023 18:20:28

Sample Analysis

Date/Time: 12/28/2023 16:50:49
 Tech: 2816
 SOP: 405
 Final Weight: 0.0516 g
 Volume: 1 ml

ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LIMIT (ppm)	RESULTS (ppm)	ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LIMIT (ppm)	RESULTS (ppm)
1,1-Dichloroethene	0.6/0.63	1	8	ND	Heptane	6/140	1	5000	ND
1,2-Dichloroethane	0.012/0.12	1	2	ND	Hexanes	0.06/18	1	250	ND
Acetone	9/140	1	750	<LOQ	Isopropyl alcohol	3/140	1	500	<LOQ
Acetonitrile	0.72/25	1	60	<LOQ	Methanol	6/100	1	250	<LOQ
Benzene	0.06/1	1	1	ND	Methylene chloride	1.5/1.5	1	125	ND
Butane	48/50	1	5000	ND	Pentane	9/140	1	750	ND
Chloroform	0.2/1	1	2	ND	Propane	30/30	1	5000	ND
Ethanol	12/140	1	5000	<LOQ	Toluene	0.9/53	1	150	ND
Ethyl acetate	2.4/140	1	400	ND	Total xylenes	1.8/130	1	150	ND
Ethyl ether	6/140	1	500	ND	Trichloroethylene	0.3/1	1	25	ND
Ethylene oxide	0.6/2	1	5	ND					

HEAVY METAL ANALYSIS

ICP-MS

PASS

Sample Prep

Tech: 3396
 SOP: 428
 Batch Number: 62050
 Batch Date: 12/28/2023 10:19:09

Sample Analysis

Date/Time: 12/28/2023 14:34:30
 Tech: 3396
 SOP: 428
 Final Weight: 0.2629 g
 Volume: 60 ml

ANALYTE	LOD/LOQ (ppb)	DIL.	ACTION LIMIT (ppb)	RESULTS (ppb)
Arsenic	20/75	1	1500	ND
Cadmium	20/75	1	500	ND
Lead	20/75	1	500	ND
Mercury	20/75	1	3000	ND

FILTH & FOREIGN MATERIAL ANALYSIS

Result: **PASS**

Sample Prep and Analysis

Date/Time: 12/29/2023 11:41:08
 Tech: 3393
 SOP: 409
 Final Weight: 78.4 g

Diana Asensio, M.S.

Lab Director

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SunFlora Inc.
 Order #: 84839
 Retail Batch #:
 Neuro FS Natural
 1800mg Water
 Soluble
 (1223FSNRO)

CERTIFICATE OF ANALYSIS
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 103104
 License #: CMTL-0004

MICROBIAL ANALYSIS
PASS

Sample Prep

Tech: 4090
 SOP: 406

Batch Number: 62042
 Batch Date: 12/27/2023 14:11:14

Sample Analysis

Date/Time: 12/28/2023 18:32:27
 Tech: 4302
 SOP: 406

Final Weight: 1.0144 g

ANALYTE	TEST METHOD	ALLOWABLE CRITERIA	ACTUAL RESULT	PASS/FAIL
Total yeast and mold	qPCR	NA	NOT DETECTED	PASS

Sample Prep

Tech: 4090
 SOP: 406

Batch Number: 62043
 Batch Date: 12/27/2023 14:11:53

Sample Analysis

Date/Time: 12/29/2023 15:19:51
 Tech: 3358
 SOP: 406

Final Weight: 1.0146 g

ANALYTE	TEST METHOD	ALLOWABLE CRITERIA	ACTUAL RESULT	PASS/FAIL
Aspergillus flavus	qPCR	< 1 CFU/g	NOT DETECTED	PASS
Aspergillus fumigatus	qPCR	< 1 CFU/g	NOT DETECTED	PASS
Aspergillus niger	qPCR	< 1 CFU/g	NOT DETECTED	PASS
Aspergillus terreus	qPCR	< 1 CFU/g	NOT DETECTED	PASS

Sample Prep

Tech: 4090
 SOP: 406

Batch Number: 62043
 Batch Date: 12/27/2023 14:11:53

Sample Analysis

Date/Time: 12/29/2023 15:19:51
 Tech: 3358
 SOP: 406

Final Weight: 1.0146 g

ANALYTE	TEST METHOD	ALLOWABLE CRITERIA	ACTUAL RESULT	PASS/FAIL
Pathogenic e. coli	qPCR	< 1 CFU/g	NOT DETECTED	PASS

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 Order #: 84839
 Retail Batch #:
 Neuro FS Natural
 1800mg Water
 Soluble
 (1223FSNRO)

CERTIFICATE OF ANALYSIS
 ISO/IEC: 17025:2017 Accreditation #:
 103104
 License #: CMTL-0004

MICROBIAL ANALYSIS
PASS

Sample Prep

Tech: 4090
 SOP: 406

Batch Number: 62043
 Batch Date: 12/27/2023 14:11:53

Sample Analysis

Date/Time: 12/29/2023 15:19:51
 Tech: 3358
 SOP: 406

Final Weight: 1.0146 g

ANALYTE	TEST METHOD	ALLOWABLE CRITERIA	ACTUAL RESULT	PASS/FAIL
Salmonella	qPCR	< 1 CFU/g	NOT DETECTED	PASS
STEC e. coli	qPCR	< 1 CFU/g	NOT DETECTED	PASS

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SunFlora Inc.
Order #: 84839
Retail Batch #:
Neuro FS Natural
1800mg Water
Soluble
(1223FSNRO)

CERTIFICATE OF ANALYSIS

ISO/IEC: 17025:2017 Accreditation #:
103104
License #: CMTL-0004

WATER ACTIVITY

Water Activity Meter
Water: 0.916 Aw

Sample Prep and Analysis

Date/Time: 12/29/2023 11:41:08
Tech: 3393
SOP: 407
Final Weight: 1.0146 g



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SunFlora Inc.
 Order #: 84058
 Retail Batch #: 14g
 CBG/CBD Mix Raw
 Hemp
 102023RHMx

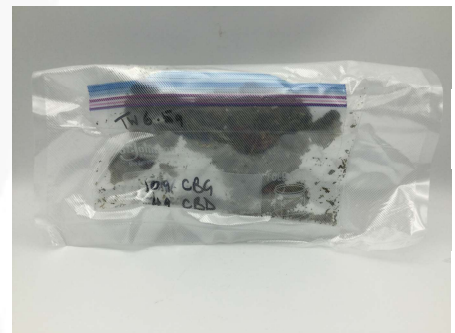
CERTIFICATE OF ANALYSIS
 ISO/IEC: 17025:2017 Accreditation #:
 103104
 License #: CMTL-0004

Order Information

Order #: 84058
 Order Name: 14g CBG/CBD Mix Raw Hemp
 102023RHMx
 Retail Batch #: 14g CBG/CBD Mix Raw Hemp
 102023RHMx
 Received: 10/19/2023 16:38:49
 Complete: 10/27/2023 15:00:23

Batch Information

Create Date: Total Qty.: 0
 Exp. Date: Matrix: Flower (M)
 Size: 0 Pickup Weight: N/A



CANNABINOID PROFILE TESTED	LABEL CLAIM NOT APPLICABLE	MICROBIAL ANALYSIS PASS
RESIDUAL SOLVENTS PASS	AGRICULTURAL AGENTS PASS	HEAVY METAL ANALYSIS PASS
TERPENES TOTAL TESTED	MOISTURE ANALYSIS NOT TESTED	WATER ACTIVITY TESTED
FILTH & FOREIGN MATERIAL ANALYSIS PASS	HOMOGENEITY NOT TESTED	MYCOTOXIN ANALYSIS PASS

0.1162 %
Total THC

4.3263 %
Total CBD

12.7121 %
Total Cannabinoids

Diana Asensio, M.S.

Lab Director

ACT Laboratories Florida
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 Davie, FL 33314
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 Hemp
 102023RHMx

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Sample Prep

Tech: 3393
 SOP: 418
 Batch Number: 61687
 Batch Date: 10/19/2023 12:45:32

Sample Analysis

Date/Time: 10/20/2023 13:40:27
 Tech: 3445
 SOP: 417
 Final Weight: 0.1051 g
 Volume: 40 ml

CANNABINOID PROFILE
 HPLC-DAD

0.1162 % Total THC	1.162 mg THC Per Unit	16.268 mg THC Per Pkg
4.3263 % Total CBD	43.263 mg CBD Per Unit	605.682 mg CBD Per Pkg
12.7121 % Total Cannabinoids	127.121 mg Cannabinoids Per Unit	1779.694 mg Cannabinoids Per Pkg

Cannabinoid Potency

ANALYTE	LOD/LOQ (mg/g)	DIL.	ACTUAL %	DRY WT. %	MG/G	MG/UNIT	MG/PACKAGE	LABEL CLAIM (mg)	% LABEL VAR.
CBC	0.129/0.3908	1	0.277	0.277	2.772	2.772	38.808	--	--
CBD	0.129/0.3908	1	3.024	3.024	30.236	30.236	423.304	--	--
CBDA	0.129/0.3908	1	1.485	1.485	14.854	14.854	207.956	--	--
CBDV	0.129/0.3908	1	ND	ND	ND	ND	ND	--	--
CBG	0.129/0.3908	1	0.704	0.704	7.037	7.037	98.518	--	--
CBGA	0.129/0.3908	1	6.967	6.967	69.666	69.666	975.324	--	--
CBN	0.129/0.3908	1	0.042	0.042	0.418	0.418	5.852	--	--
d8-THC	0.129/0.3908	1	ND	ND	ND	ND	ND	--	--
d9-THC	0.129/0.3908	1	0.116	0.116	1.162	1.162	16.268	--	--
THCA	0.129/0.3908	1	ND	ND	ND	ND	ND	--	--
THCV	0.129/0.3908	1	ND	ND	ND	ND	ND	--	--

Additional Cannabinoids

ANALYTE	LOD/LOQ (mg/g)	DIL.	ACTUAL %	DRY WT. %	MG/G	MG/UNIT	MG/PACKAGE	LABEL CLAIM (mg)	% LABEL VAR.
CBDVA	0.129/0.3908	1	ND	ND	ND	ND	ND	--	--
CBL	0.129/0.3908	1	ND	ND	ND	ND	ND	--	--
CBT	0.129/0.3908	1	0.098	0.098	0.976	0.976	13.664	--	--
d10-THC	0.129/0.3908	1	ND	ND	ND	ND	ND	--	--
d9-THCP	0.129/0.3908	1	ND	ND	ND	ND	ND	--	--
exo-THC	0.129/0.3908	1	ND	ND	ND	ND	ND	--	--

mg/unit = 1 (g) per unit x cannabinoid concentration (mg/g)
 Total THC = THC + (0.877 x THCA) and Total CBD = CBD + (0.877 x CBDA)
 ND = Not Detected, NT = Not Tested, <LOQ = Below Limit of Quantitation

CANNABINOID TOTALS	ACTUAL %	DRY WEIGHT %	MG/G	MG/UNIT	MG/PACKAGE
Total THC	0.116	0.116	1.162	1.162	16.268
Total CBD	4.326	4.326	43.263	43.263	605.682
Total Cannabinoids	12.712	12.712	127.121	127.121	1779.694

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Agricultural Agents

GC-MS/MS

PASS

Sample Prep

Tech: 4090
 SOP: 402
 Batch Number: 61700
 Batch Date: 10/20/2023 14:03:50

Sample Analysis

Date/Time: 10/23/2023 16:42:48
 Tech: 2816
 SOP: 402
 Final Weight: 0.5219 g
 Volume: 10 ml

ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LEVEL (ppm)	RESULTS (ppm)
Captan	0.07/0.1	1	0.7	ND
Chlordane	0.01/0.1	1	0.1	ND
Chlorfenapyr	0.01/0.1	1	0.1	ND
Coumaphos	0.01/0.1	1	0.1	ND
Cyfluthrin	0.01/0.1	1	0.5	ND
Cypermethrin	0.01/0.1	1	0.5	ND
Methyl parathion	0.01/0.1	1	0.1	ND
Pentachloronitrobenzene	0.01/0.1	1	0.15	ND

MYCOTOXIN ANALYSIS

LC-MS/MS

PASS

Sample Prep

Tech: 4090
 SOP: 432
 Batch Number: 61701
 Batch Date: 10/20/2023 15:43:29

Sample Analysis

Date/Time: 10/24/2023 10:12:14
 Tech: 3445
 SOP: 424
 Final Weight: 0.1033 g
 Volume: 2.5 ml

ANALYTE	LOD/LOQ (ppb)	DIL.	ACTION LEVEL (ppb)	RESULTS (ppb)
Aflatoxin B1	4/10	1	0	ND
Aflatoxin B2	4/10	1	0	ND
Aflatoxin G1	4/10	1	0	ND
Aflatoxin G2	4/5	1	0	ND
Ochratoxin A	10/10	1	20	ND
Total Aflatoxins	4/10	1	20	ND

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 Retail Batch #: 14g
 CBG/CBD Mix Raw
 Hemp
 102023RHMx

CERTIFICATE OF ANALYSIS

ISO/IEC: 17025:2017 Accreditation #: 103104
 License #: CMTL-0004

Agricultural Agents

LC-MS/MS

PASS

Sample Prep

Tech: 4090
 SOP: 432
 Batch Number: 61701
 Batch Date: 10/20/2023 15:43:29

Sample Analysis

Date/Time: 10/24/2023 10:12:14
 Tech: 3445
 SOP: 424
 Final Weight: 0.1033 g
 Volume: 2.5 ml

ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LEVEL(ppm)	RESULTS (ppm)	ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LIMIT(ppm)	RESULTS (ppm)
Abamectin B1a	0.083/0.25	1	0.5	ND	Hexythiazox	0.167/0.5	1	1	ND
Acephate	0.067/0.2	1	0.4	ND	Imazalil	0.033/0.1	1	0.2	ND
Acequinocyl	0.333/1	1	2	ND	Imidacloprid	0.067/0.2	1	0.4	ND
Acetamiprid	0.033/0.1	1	0.2	ND	Kresoxim-methyl	0.067/0.2	1	0.4	ND
Aldicarb	0.067/0.2	1	0.4	ND	Malathion	0.033/0.1	1	0.2	ND
Azoxystrobin	0.033/0.1	1	0.2	ND	Metalaxyl	0.033/0.1	1	0.2	ND
Bifenazate	0.033/0.1	1	0.2	ND	Methiocarb	0.033/0.1	1	0.2	ND
Bifenthrin	0.033/0.1	1	0.2	ND	Methomyl	0.067/0.2	1	0.4	ND
Boscalid	0.067/0.2	1	0.4	ND	Myclobutanil	0.033/0.1	1	0.2	ND
Carbaryl	0.033/0.1	1	0.2	ND	Naled	0.083/0.25	1	0.5	ND
Carbofuran	0.033/0.1	1	0.2	ND	Oxamyl	0.167/0.5	1	1	ND
Chlorantranilprole	0.033/0.1	1	0.2	ND	Pactobutrazol	0.067/0.2	1	0.4	ND
Chlorfenapyr	0.167/0.5	1	1	ND	Permethrins	0.033/0.1	1	0.2	ND
Chlorpyrifos	0.033/0.1	1	0.2	ND	Phosmet	0.033/0.1	1	0.2	ND
Clofentezine	0.033/0.1	1	0.2	ND	Piperonyl Butoxide	0.333/1	1	2	ND
Cyfluthrin	0.167/0.5	1	1	ND	Prallethrin	0.033/0.1	1	0.2	ND
Cypermethrin	0.167/0.5	1	1	ND	Propiconazole	0.067/0.2	1	0.4	ND
Daminozide	0.167/0.5	1	1	ND	Propoxur	0.033/0.1	1	0.2	ND
Diazinon	0.033/0.1	1	0.2	ND	Pyrethrins	0.033/0.1	1	1	ND
Dichlorvos	0.017/0.05	1	0.1	ND	Pyridaben	0.033/0.1	1	0.2	ND
Dimethoate	0.033/0.1	1	0.2	ND	Spinosad	0.033/0.1	1	0.2	ND
Ethoprophos	0.033/0.1	1	0.2	ND	Spiromesifen	0.033/0.1	1	0.2	ND
Etofenprox	0.067/0.2	1	0.4	ND	Spirotetramat	0.033/0.1	1	0.2	ND
Etoxazole	0.033/0.1	1	0.2	ND	Spiroxamine	0.067/0.2	1	0.4	ND
Fenoxycarb	0.033/0.1	1	0.2	ND	Tebuconazole	0.067/0.2	1	0.4	ND
Fenpyroximate	0.067/0.2	1	0.4	ND	Thiacloprid	0.033/0.1	1	0.2	ND
Fipronil	0.067/0.2	1	0.4	ND	Thiamethoxam	0.033/0.1	1	0.2	ND
Fonicamid	0.167/0.5	1	1	ND	Trifloxystrobin	0.033/0.1	1	0.2	ND
Fludioxonil	0.067/0.2	1	0.4	ND					

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 Retail Batch #: 14g
 CBG/CBD Mix Raw
 Hemp
 102023RHMx

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 License #: CMTL-0004

TERPENES TOTAL
 GC-FID **TESTED (0.498 %)**

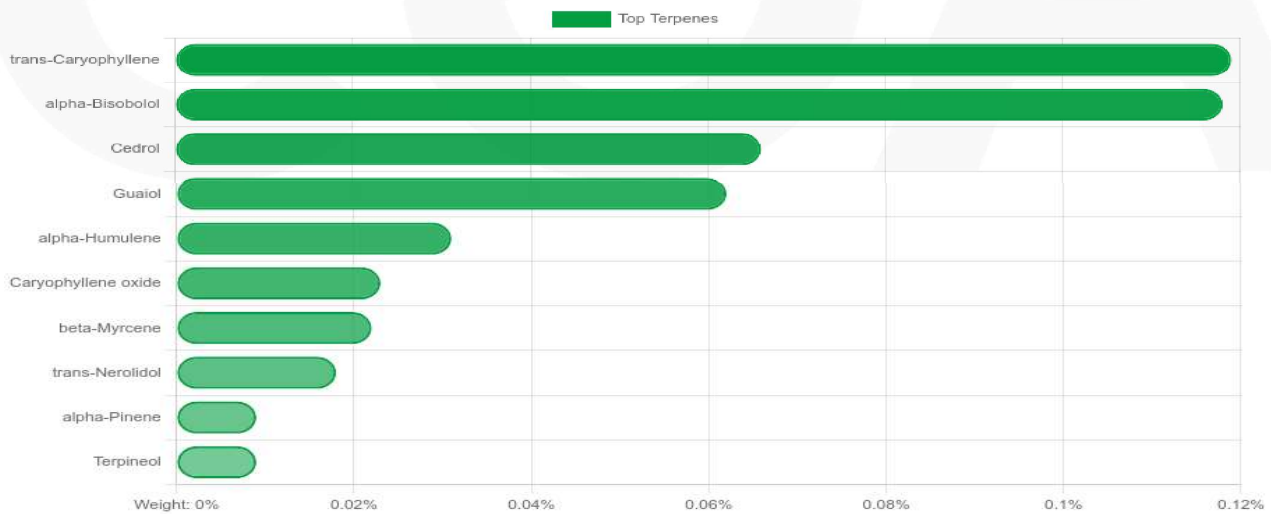
Sample Prep

Tech: 4090
 SOP: 421
 Batch Number: 61699
 Batch Date: 10/20/2023 14:03:37

Sample Analysis

Date/Time: 10/23/2023 16:45:45
 Tech: 2816
 SOP: 419
 Final Weight: 0.4081 g
 Volume: 10 ml

TERPENE	LOD/LOQ (%)	DIL.	RESULTS (%)	TERPENE	LOD/LOQ (%)	DIL.	RESULTS (%)
3-Carene	0.001/0.003	1	ND	Geraniol	0.001/0.003	1	ND
alpha-Bisobolol	0.001/0.003	1	0.118	Geranyl acetate	0.001/0.003	1	ND
alpha-Cedrene	0.001/0.003	1	ND	Guaiol	0.001/0.003	1	0.062
alpha-Humulene	0.001/0.003	1	0.031	Hexahydrothymol	0.001/0.003	1	ND
alpha-Pinene	0.001/0.003	1	0.009	Isoborneol	0.001/0.003	1	ND
alpha-Terpinene	0.001/0.003	1	ND	Isopulegol	0.001/0.003	1	ND
beta-Myrcene	0.001/0.003	1	0.022	Limonene	0.001/0.003	1	0.006
beta-Pinene	0.001/0.003	1	ND	Linalool	0.001/0.003	1	0.005
Borneol	0.001/0.003	1	0.003	Nerol	0.001/0.003	1	ND
Camphene	0.001/0.003	1	ND	p-Mentha-1,5-diene	0.001/0.003	1	ND
Camphor	0.001/0.003	1	ND	Pulegone	0.001/0.003	1	ND
Caryophyllene oxide	0.001/0.003	1	0.023	Sabinene hydrate	0.001/0.003	1	ND
Cedrol	0.001/0.003	1	0.066	Terpineol	0.001/0.003	1	0.009
cis-Nerolidol	0.001/0.003	1	ND	Terpinolene	0.001/0.003	1	ND
cis-Ocimene	0.001/0.003	1	ND	trans-Caryophyllene	0.001/0.003	1	0.119
Eucalyptol	0.001/0.003	1	ND	trans-Nerolidol	0.001/0.003	1	0.018
Fenchone	0.001/0.003	1	ND	trans-Ocimene	0.001/0.003	1	ND
Fenchyl alcohol	0.001/0.003	1	0.007	Valencene	0.001/0.003	1	ND
gamma-Terpinene	0.001/0.003	1	ND				



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 Retail Batch #: 14g
 CBG/CBD Mix Raw
 Hemp
 102023RHMx

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 103104
 License #: CMTL-0004

RESIDUAL SOLVENTS
 HS-GC-MS **PASS**

Sample Prep

Tech: 2816
 SOP: 405
 Batch Number: 61715
 Batch Date: 10/24/2023 10:21:16

Sample Analysis

Date/Time: 10/25/2023 12:57:34
 Tech: 3445
 SOP: 405
 Final Weight: 0.0535 g
 Volume: 1 ml

ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LIMIT (ppm)	RESULTS (ppm)	ANALYTE	LOD/LOQ (ppm)	DIL.	ACTION LIMIT (ppm)	RESULTS (ppm)
1,1-Dichloroethene	0.6/0.63	1	8	ND	Ethylene oxide	0.6/2	1	5	ND
1,2-Dichloroethane	0.012/0.12	1	2	ND	Heptane	6/140	1	5000	ND
Acetone	9/140	1	750	<LOQ	Hexanes	0.06/18	1	250	ND
Acetonitrile	0.72/25	1	60	<LOQ	Methanol	6/100	1	3000	235.027
Benzene	0.06/1	1	1	ND	Methylene chloride	1.5/1.5	1	125	ND
Butane	48/50	1	5000	ND	Pentane	9/140	1	750	ND
Chloroform	0.2/1	1	2	ND	Propane	30/30	1	5000	ND
Ethanol	12/140	1	5000	ND	Toluene	0.9/53	1	150	ND
Ethyl acetate	2.4/140	1	400	ND	Total xylenes	1.8/130	1	150	ND
Ethyl ether	6/140	1	500	ND	Trichloroethylene	0.3/1	1	25	ND

HEAVY METAL ANALYSIS
 ICP-MS **PASS**

Sample Prep

Tech: 3396
 SOP: 428
 Batch Number: 61710
 Batch Date: 10/23/2023 10:21:13

Sample Analysis

Date/Time: 10/23/2023 14:36:40
 Tech: 3396
 SOP: 428
 Final Weight: 0.2266 g
 Volume: 60 ml

ANALYTE	LOD/LOQ (ppb)	DIL.	ACTION LIMIT (ppb)	RESULTS (ppb)
Arsenic	20/75	1	200	<LOQ
Cadmium	20/75	1	200	<LOQ
Lead	20/75	1	500	140.335
Mercury	20/75	1	200	ND

FILTH & FOREIGN MATERIAL ANALYSIS
 Result: **PASS**

Sample Prep and Analysis

Date/Time: 10/22/2023 18:05:49
 Tech: 4090
 SOP: 409
 Final Weight: 4.1 g

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MICROBIAL ANALYSIS
PASS

Sample Prep

Tech: 4090
 SOP: 406

Batch Number: 61694
 Batch Date: 10/20/2023 14:01:28

Date/Time: 10/24/2023 11:25:25
 Tech: 3571
 SOP: 406

Sample Analysis

Final Weight: 1.0127 g

ANALYTE	TEST METHOD	ALLOWABLE CRITERIA	ACTUAL RESULT	PASS/FAIL
Total yeast and mold	qPCR	NA	< 10,000	PASS

Sample Prep

Tech: 4090
 SOP: 406

Batch Number: 61695
 Batch Date: 10/20/2023 14:01:55

Date/Time: 10/23/2023 21:53:10
 Tech: 3571
 SOP: 406

Sample Analysis

Final Weight: 1.0045 g

ANALYTE	TEST METHOD	ALLOWABLE CRITERIA	ACTUAL RESULT	PASS/FAIL
Salmonella	qPCR	< 1 CFU/g	NOT DETECTED	PASS
STEC e. coli	qPCR	< 1 CFU/g	NOT DETECTED	PASS

Sample Prep

Tech: 4090
 SOP: 406

Batch Number: 61695
 Batch Date: 10/20/2023 14:01:55

Date/Time: 10/23/2023 21:53:10
 Tech: 3571
 SOP: 406

Sample Analysis

Final Weight: 1.0045 g

ANALYTE	TEST METHOD	ALLOWABLE CRITERIA	ACTUAL RESULT	PASS/FAIL
Aspergillus flavus	qPCR	< 1 CFU/g	NOT DETECTED	PASS
Aspergillus fumigatus	qPCR	< 1 CFU/g	NOT DETECTED	PASS
Aspergillus niger	qPCR	< 1 CFU/g	NOT DETECTED	PASS
Aspergillus terreus	qPCR	< 1 CFU/g	NOT DETECTED	PASS

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MICROBIAL ANALYSIS
PASS

Sample Prep

Tech: 3393
 SOP: 406

Batch Number: 61716
 Batch Date: 10/24/2023 10:34:35

Sample Analysis

Date/Time: 10/26/2023 18:21:08
 Tech: 3571
 SOP: 406
 Final Weight: 1.002 g

ANALYTE	TEST METHOD	ALLOWABLE CRITERIA	ACTUAL RESULT	PASS/FAIL
Pathogenic e. coli	qPCR	NA	NOT DETECTED	PASS

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Retail Batch #: 14g
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Hemp
102023RHMx

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License #: CMTL-0004

WATER ACTIVITY

Water Activity Meter
Water: 0.498 Aw

Sample Prep and Analysis

Date/Time: 10/22/2023 18:40:52
Tech: 4090
SOP: 407
Final Weight: 1.0101 g



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EXHIBIT
4

STATE OF IOWA DEPARTMENT OF
Health AND Human
SERVICES

Kim Reynolds
GOVERNOR
Adam Gregg
LT. GOVERNOR
Kelly Garcia
DIRECTOR

BUREAU OF CANNABIS REGULATION

FEE \$475.00

CONSUMABLE HEMP RETAILER

REGISTRATION #199056

YOUR CBD STORE VALLEY JUNCTION

Green Onyx Inc
2801 Grand Avenue
Ames, IA 50010

The aforesaid, having deposited the required fee, is hereby granted the above registration pursuant to chapter 204, code of Iowa. This registration shall remain in full force from the date of issue until its expiration date, unless revoked or suspended for cause by the department of health and human services for noncompliance with chapter 204, code of Iowa or rules promulgated pursuant thereto.

REGISTRATION FOR
FOLLOWING LOCATION:

125 5th Street
West Des Moines, IA 50265

DATE OF ISSUE:

3/16/2024

EXPIRATION DATE:

3/16/2025

This registration is issued by:
IOWA DEPARTMENT OF HEALTH AND HUMAN
SERVICES BUREAU OF CANNABIS
REGULATION

321 E 12TH ST FL 6
DES MOINES, IA 50319-0083
Phone: 877-214-9313
Email: consumable.hemp@idph.iowa.gov
Web Site: hhs.iowa.gov/consumable-hemp



This QR code can be used
to verify this Consumable
Hemp Establishment

POST IN CONSPICUOUS PLACE

NONTRANSFERABLE

Visit hhs.iowa.gov/consumable-hemp