

EXHIBIT

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**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.

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' Supplement Brief in Support of Their Motion for Preliminary Injunction.
3. I am the owner of two separate stores as franchises of Sunmed™ Your CBD Store,

which is a national franchise that specializes in cannabidiol (“CBD”) products. My stores 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. In order to sell hemp products in Iowa, every entity is required to submit products for approval on the Consumable Hemp Registration Portal (“portal”).

5. I have complied with this process since I began selling covered products in Iowa.

6. Any time there was an issue with my submission of a product, I received a notice from DHHS as to why my submission was denied or on hold. A copy of an example of this notice is attached as Exhibit 1.

7. Currently, all of my products that were uploaded prior to July 1, 2024, continue to have an “approved” status. A screenshot of the portal as it stands today is attached as Exhibit 2. These include products that have more than 10 mg of total THC in a bottle (e.g. liquid tincture), a jar (e.g. topical cream) or package of gummies.

8. While DHHS has typically been very responsive to my questions regarding the portal, or anything else related to consumable hemp products, since the filing of this litigation, I have received no responses to my emails or questions posed to DHHS regarding how I can remain in compliance with the new laws. Specifically, I sent emails on July 3 and July 8, 2024 and I’ve received no response from DHHS.

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

Executed this 15th day of July 2024.

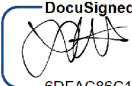
DocuSigned by:

6DFAC86C1B6C44B...
Lacie Navin



EXHIBIT
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Lacie Navin <lacienavin@gmail.com>

Registration Pending: HHS Consumable Hemp - 199055

1 message

consumable.hemp@idph.iowa.gov <consumable.hemp@idph.iowa.gov>
To: "lacienavin@gmail.com" <lacienavin@gmail.com>

Fri, Feb 16, 2024 at 12:49 PM



Kim Reynolds
GOVERNOR
Adam Gregg
LT. GOVERNOR
Kelly Garcia
DIRECTOR

To: lacienavin@gmail.com
Date: 2/16/2024

Hello Lacie,

Thank you for submitting your Registration as a Consumable Hemp Establishment. After review, your application has been placed into pending status for the following reasons:

Non Conforming Product List

- One or more of your products was denied. Please see attached file for list of denied products. You can make edits directly to that file and upload it in the portal when you are ready.

Additional Information

- missing residual solvents on the 1 denied flower

**You must resolve these issues before HHS can Approve your Registration.
Registrants are not legally authorized to sell Consumable Hemp products without an Issued Registration:**

Iowa Administrative Code 641, Chapter 156 states:

- **156.2:** *A consumable hemp establishment shall not engage in manufacturing, processing, packing, holding, preparing, distributing, or selling a consumable hemp product in Iowa or to purchasers located in Iowa until it has submitted a consumable hemp registration that is approved by the department.*



ID	Status	Product Name	Approval	Category	Location	Link 1	Link 2
27364334	Yes	Sunmed Broad S...	Approved	Topical	Palmetto FL	https://g...	https://g...
27364325	Yes	Sunmed Broad S...	Approved	Topical	Palmetto FL	https://g...	https://g...
27364326	Yes	Sunmed Broad S...	Approved	Topical	Palmetto FL	https://g...	https://g...
27364324	Yes	Sunmed Broad S...	Approved	Topical	Palmetto FL	https://g...	https://g...
3300031	Yes	Sunmed Broad S...	Approved	Topical	Palmetto FL	https://g...	https://g...
3300033	Yes	Sunmed Broad S...	Approved	Edible	Palmetto FL	https://g...	https://g...
3300030	Yes	Sunmed Broad S...	Approved	Edible	Palmetto FL	https://g...	https://g...
3300032	Yes	Sunmed Broad S...	Approved	Edible	Palmetto FL	https://g...	https://g...
5000142	Yes	Sunmed Beyond ...	Approved	Oral	Palmetto FL	https://g...	https://g...
5000141	Yes	Sunmed Beyond ...	Approved	Oral	Palmetto FL	https://g...	https://g...
3200027	Yes	Sunmed Beyond ...	Approved	Edible	Palmetto FL	https://g...	https://g...
2241046	Yes	Sunmed Beyond ...	Approved	Edible	Palmetto FL	https://g...	https://g...
3300026	Yes	Sunmed Beyond ...	Approved	Edible	Palmetto FL	https://g...	https://g...
3200026	Yes	Sunmed Beyond I...	Approved	Edible	Palmetto FL	https://g...	https://g...
2241045	Yes	Sunmed Beyond I...	Approved	Edible	Palmetto FL	https://g...	https://g...
3300025	Yes	Sunmed Beyond I...	Approved	Edible	Palmetto FL	https://g...	https://g...
3300027	Yes	Sunmed Beyond I...	Approved	Edible	Palmetto FL	https://g...	https://g...
3300024	Yes	Sunmed Beyond ...	Approved	Edible	Palmetto FL	https://g...	https://g...
3300044	Yes	Sunmed Beyond ...	Approved	Edible	Palmetto FL	https://g...	https://g...
BATH-S...	Yes	Sunmed Bath So...	Approved	Topical	Palmetto FL	https://g...	https://g...
BEA-BT...	Yes	Sunmed Bath Bo...	Approved	Topical	Palmetto FL	https://g...	https://g...
260001	Yes	Sunmed ABOVE ...	Approved	Edible	Palmetto FL	https://g...	https://g...
2241042	Yes	Sunmed Above D...	Approved	Edible	Palmetto FL	https://g...	https://g...
3300043	Yes	Sunmed Above + ...	Approved	Edible	Palmetto FL	https://g...	https://g...

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