

**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 PATRICK SHATZER

I, Patrick Shatzer, 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 Regulatory Affairs Senior Manager for Sunmed™ Your CBD Store, a

national franchise that specializes in cannabidiol (“CBD”) products.

4. Lacie Navin’s Sunmed™ Your CBD Store franchise is a party to the above-captioned lawsuit.

5. Sunmed™ also is a franchisor supplier of products to 11 other stores across Iowa.

6. Sunmed™ Your CBD Store is not required to be registered with the USDA for its products. However, Sunmed™ Your CBD Store is registered with the State of Florida, under Florida’s hemp program.

7. Sunmed™ Your CBD Store franchisees will ship products within Iowa and to the states surrounding Iowa, including Wisconsin, Illinois, Minnesota, North Dakota, South Dakota, and Nebraska. Sunmed™ Your CBD Store franchisees will also ship directly to consumers via online sales to all legal states.

8. Some of Sunmed™ Your CBD Store products have products that contain hemp-derived Delta-8 THC. Because Iowa Hemp Amendments do not define with a “synthetic consumable hemp product” is at this time (and it is my understanding that the regulations created to enforce the Hemp Amendments are not yet final), Sunmed™ Your CBD Store is unaware if these products fall under that Iowa will define as “synthetic consumable hemp product.”

9. Sunmed™ Your CBD Store, nationwide, has sold hundreds of thousands of products and no adverse events regarding our customers have been reported.

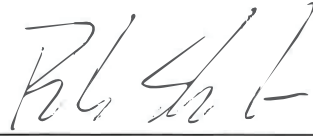
10. We are also unsure how Iowa interprets the “per serving” and “per container” requirements of the Potency Provision. This is especially so for any of the full spectrum products that support a 30-day supply, of which many of Sunmed™ Your CBD Store’s products are.

11. Further, if every state intends to do what Iowa seeks to do with the Hemp Amendments, like adjust the packaging and labeling requirements, implement potency limitations,

etc., it will be near impossible for manufacturers like Sunmed™ Your CBD Store to comply with all of the different requirements, let alone meet any demand.

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

Executed this 15 day of July 2024.



Patrick Shatzer