

2023 MDMDA CANMD SB 671 Reciprocity.pdf

Uploaded by: Ashlie Bagwell

Position: FAV



TESTIMONY ON BEHALF OF THE MARYLAND MEDICAL DISPENSARY
ASSOCIATION AND THE MARYLAND WHOLESALE MEDICAL
CANNABIS TRADE ASSOCIATION

Senate Bill 671—Medical Cannabis—Visiting Qualifying Patients

SUPPORT

Senate Finance Committee

March 9, 2023

The Maryland Medical Dispensary Association (MDMDA) and the Maryland Wholesale Medical Cannabis Trade Association (CANMD) appreciate the opportunity to provide comments on Senate Bill 671—Medical Cannabis—Visiting Qualifying Patients.

Senate Bill 671 allows a visiting qualifying patient to participate in Maryland’s medical cannabis program. A number of states already have programs like this in place that would allow for reciprocity, including Washington, DC. The MDMDA and CANMD support such programs as they allow patients who are traveling, whether for business or for pleasure, the ability to obtain medication more easily. Considering the number of Americans who rely on medical cannabis to manage their health care conditions—nearly 3.6 million according to 2021 statistics—reciprocity is a commonsense measure. Since the Commission and others are focused right now on the future implementation of the adult-use program, we would be in support of a delayed implementation date.

For this simple and straightforward reason, we urge the Senate Finance Committee to vote favorably on Senate Bill 671.

SENATE BILL 671.pdf

Uploaded by: Warren Lemley

Position: FAV



CORPORATE OFFICES
8270 Greensboro Drive, Suite 810
McLean, Virginia 22102
703.883.0102

WELLNESS CENTER
2001 Chapman Ave.
Rockville, MD 20852

March 8, 2023

Senate Bill 671 Medical Cannabis – Visiting Qualifying Patients

Position: Favorable

Madam Chair and esteemed members of the Committee. My name is Warren Lemley, I'm President of Peake ReLeaf, an independently Maryland owned and operated medical cannabis dispensary in Rockville and I strongly support Senate Bill 671.

When we were awarded the license for District 17 we were awarded a license where I grew up. I am as local an owner and operator of a medical cannabis dispensary as you will be able to find in our State. The high school I attended is less than 5 miles from our location. The reason I bring this up is because when we were awarded a license to serve the community I grew up in, I took it seriously. I looked at this as my responsibility to provide the best medicine and service for our patients, but more importantly it placed me in a position to give back and work toward improving the rights of Maryland's patients and citizens in regard to cannabis policy. Improving patients rights is what brings me here today.

Countless times I have been at our dispensary when qualified patients from other States have come in with the expectations to be served due to their medical status in other States. Regretfully I have turned them away and directed them to Washington D.C. which allows reciprocity. There they can receive access to medical cannabis from a much smaller medical cannabis program than ours. These patients have been visiting for a number of reasons.

- Our dispensary location in Rockville is less than 5 miles away from Walter Reed National Military Medical Center and over the years we have had veterans with medical cannabis certifications from other States looking to receive their medicine who we must turn away.

- Patients traveling to receive treatment at many of our esteemed healthcare systems.
- Patients when they travel to Maryland for work.
- Patients if they are visiting or staying with family.

Other reasons this legislation is consequential:

- Out of State pediatric patients will not have access to the adult use market.
- Cannabis patients from other States should have access to medicine with higher potencies than what will be available in the adult use market. This is most important for patients with the most severe conditions.
- Cannabis patients often turn to cannabis in an effort to distance themselves from other pharmaceutical drugs. This is important because cannabis patients may no longer have access to the same pharmaceutical drugs they once took when they begin to utilize medical cannabis. This results in losing access to previous pharmaceutical drugs which means any medical cannabis patient traveling to Maryland may no longer have access to any of the medication they once took to help address their condition.

These are just some of the many reasons that we must pass SB 671. The incredible healthcare systems in Maryland are meant to improve the lives of the people in Maryland and those who seek specialized care from around the Country. We shouldn't be keeping medicine that they have become dependent on away from them resulting in a poorer quality of life.

We have worked with the MMCC to develop this legislation. It is our goal to work hand in hand with the MMCC to provide regulated medical cannabis to out of State patients utilizing the same conditions, regulatory oversight and inventory tracking system as all other patients in Maryland. Maryland currently has the most inclusive conditions list for our medical cannabis program. So if a patient is awarded a medical cannabis certification in any other State then they should be able to be awarded a medical cannabis certification in Maryland. For the many reasons listed above, I respectfully encourage a favorable report on SB 671.

Respectfully Submitted,
Warren Lemley
President, Peake ReLeaf

SB0671-853722-01.pdf

Uploaded by: Katherine Klausmeier

Position: FWA



SB0671/853722/1

AMENDMENTS
PREPARED
BY THE
DEPT. OF LEGISLATIVE
SERVICES

07 MAR 23
08:59:32

BY: Senator Klausmeier
(To be offered in the Finance Committee)

AMENDMENTS TO SENATE BILL 671
(First Reading File Bill)

AMENDMENT NO. 1

On page 1, in line 3, after “of” insert “requiring that an individual who resides in another state be registered with the Natalie M. LaPrade Medical Cannabis Commission to obtain medical cannabis in the State; requiring the Commission to register and issue an identification card to certain individuals and establish and maintain a certain registry of registered individuals;”; strike beginning with “or” in line 4 down through “Commission” in line 5; and in line 28, after “13-3301(q)” insert “and 13-3304.2”.

AMENDMENT NO. 2

On page 2, strike beginning with “PROVIDES” in line 14 down through “RESIDENCE” in line 18 and substitute “IS REGISTERED WITH THE COMMISSION UNDER § 13-3304.2 OF THIS SUBTITLE”.

On page 5, strike beginning with “OR” in line 29 down through “COMMISSION” in line 30; and after line 30, insert:

“13-3304.2.”

(A) (1) AN INDIVIDUAL WHO RESIDES IN ANOTHER STATE MUST BE REGISTERED WITH THE COMMISSION TO OBTAIN MEDICAL CANNABIS UNDER § 13-3304 OF THIS SUBTITLE.

(2) TO REGISTER WITH THE COMMISSION, AN INDIVIDUAL SHALL PROVIDE TO THE COMMISSION:

(I) THE INDIVIDUAL'S FULL LEGAL NAME;

(II) DOCUMENTATION THAT THE INDIVIDUAL HAS A VALID MEDICAL CANNABIS CERTIFICATION ISSUED BY THE INDIVIDUAL'S STATE OF RESIDENCE; AND

(III) PHOTOGRAPHIC IDENTIFICATION OR A VALID DRIVER'S LICENSE ISSUED BY THE INDIVIDUAL'S STATE OF RESIDENCE.

(3) ON RECEIPT OF THE INFORMATION REQUIRED UNDER PARAGRAPH (2) OF THIS SUBSECTION, THE COMMISSION SHALL REGISTER AND ISSUE AN IDENTIFICATION CARD TO THE INDIVIDUAL.

(B) (1) THE COMMISSION SHALL ESTABLISH AND MAINTAIN A REGISTRY OF EACH INDIVIDUAL WHO IS REGISTERED UNDER SUBSECTION (A)(3) OF THIS SECTION.

(2) THE REGISTRY ESTABLISHED UNDER PARAGRAPH (1) OF THIS SUBSECTION SHALL INCLUDE THE INFORMATION PROVIDED UNDER SUBSECTION (A)(2) OF THIS SECTION FOR EACH REGISTERED INDIVIDUAL."

On page 8, in line 10, strike "October 1, 2023" and substitute "January 1, 2024".

SB671_fwa.pdf

Uploaded by: Rusty Carr

Position: FWA

SB516 Favorable with Amendments
Warren (Rusty) Carr
4391 Moletton Drive
Mount Airy, MD 21771

I support SB516 with the following amendments.

Amendment 1: Affordability

The ATC should consider affordability as a criteria for awarding cultivation licenses. A target price for affordability could be defined by statute in relation to the 2022 average price reported by MMCC. On page 39, title 36-402 A) IT IS THE INTENT OF THE GENERAL ASSEMBLY TO PRESERVE PRODUCTION AVAILABILITY FOR NEW ADULT-USE CANNABIS CULTIVATION LICENSES ISSUED UNDER THIS SUBTITLE.

Amend to read

A) IT IS THE INTENT OF THE GENERAL ASSEMBLY TO PRESERVE PRODUCTION AVAILABILITY FOR NEW ADULT-USE CANNABIS CULTIVATION LICENSES ISSUED UNDER THIS SUBTITLE while licensing enough canopy capacity to balance the need for affordable market prices against the health of the industry.

Amendment 2: Dispensary conversion assistance

The dispensaries most harmed by the inequities in the design of the medical market are the ones least likely to have the cash to pay for the conversion fee. It is in the best interest of the public to have all current medical dispensaries convert to a standard license. This bill should have a provision to ensure that all dispensaries are able to convert. Support House amendment 6.

Amendment 3: Don't run out of medicine

BEGINNING JULY 1, 2023, A CANNABIS LICENSEE THAT IS OPERATING A DISPENSARY SHALL: (1) ENSURE THAT IT HAS ADEQUATE SUPPLY FOR QUALIFYING PATIENTS AND CAREGIVERS; AND (2) SET ASIDE OPERATING HOURS TO SERVE ONLY QUALIFYING PATIENTS AND CAREGIVERS.

This amendment requests that the operating hours condition be temporary for a period of 6 months. Further a detailed industry wide plan needs to be developed to ensure adequate supplies. Also regulators need to have temporary discretion to wave regulations to assist with resolving critical shortages. Finally, delay sales to out of state residents for 6 months. For HB1172 MMCC requested reciprocal sales to out of state medical patients be delayed until 2024 in order to not run out of cannabis. Why should out of state recreational purchasers have priority over out of state medical patients?

Amendment 4: Digital access to COAs

(Page 28) Title 36-203 (A) 2) v) 4) assigns responsibility for developing cannabis regulations to the ATC.

PACKAGING AND LABELING OF CANNABIS AND CANNABIS PRODUCTS, INCLUDING CHILD-RESISTANT PACKAGING;

Current packaging requirements require the terpene content of cannabis product to be printed on the labels. This information is not required for product safety reasons. It is extremely valuable for purchasing decisions, but it is impractical to make purchasing decisions at the dispensary counter. This information is often not available or incorrect on online menus due to the fact that the data must be reentered. This amendment requests adding a requirement for the ATC to develop regulations requiring a digital COA to be incorporated into packaging and online menus so that terpene information is available and accurate at the point where purchasing decisions are made.

PACKAGING AND LABELING OF CANNABIS AND CANNABIS PRODUCTS, INCLUDING CHILD-RESISTANT PACKAGING and digital COA access to the public and online menus;

Amendment 5: Don't ban public use

On page 68, title 36-1102 says

- (A) THIS TITLE MAY NOT BE CONSTRUED TO AUTHORIZE AN INDIVIDUAL TO:
 - (1)
 - (2) USE CANNABIS IN A PUBLIC PLACE;

If this title does not authorize an individual to use cannabis in a public place, what does this line authorize? It appears to authorize local jurisdictions to ban all forms of public use, including topical use and consumption prior to entering a public place. This amendment requests that 36-1102 A) (2) be struck and 36-1102 A) (3) be amended to read USE CANNABIS IN A MOTOR VEHICLE on a public roadway;

Amendment 6: End the medical allotment system

This bill does not specify any sales limits for retail sales, nor tracking of retail purchases. Presumably, this means that medical patients can exceed their 30 day allotment by purchasing retail and paying tax. Unless there are limits on sales more restrictive than the personal limit, the medical allotment system no longer functions as a limit on what patients can purchase. Currently, the only sales limits that the allotment system effectively imposes upon medical patients are via outages and errors. How many accounts go negative every day? Shouldn't that be impossible? There are patients with allotments >500 grams/30 days compared to the standard 120 grams. A 1.5 oz/purchase limit is 42.5 grams. What is the purpose of a rolling 30 day limit of 120 grams when you can purchase that much in 3 visits? When an allotment increase is readily available to anyone, price is a more effective limit on the amount purchased and diversion from the medical program is not economically practical at scale when one purchases at retail. Ask yourself how the math works at \$8 gram at 300 grams per month. Make the purchase limit 120 grams per purchase for all medical patients. Keep the possession limit at the 30 day allotment value, but don't use the allotment system. Page 35, title 36-302 Section G states:

A QUALIFYING PATIENT MAY POSSESS UP TO: (1) 120 GRAMS OF USABLE CANNABIS; OR (2) 36 GRAMS OF DELTA-9-TETRAHYDROCANNABINOL (THC) IN THE CASE OF A CANNABIS-INFUSED PRODUCT.

Technically, concentrates are not cannabis infused products. This title does not appear to rescind the current law that allows medical patients to possess their allotment value. The current wording for the allotment limit is:

The standard amount certification issued by a provider for a patient identifies **the quantity of dried flower and/or THC** that the patient can purchase in a given 30-day period.

This amendment proposes that Section G read:

A QUALIFYING PATIENT MAY purchase UP TO: (1) 120 GRAMS OF dried CANNABIS flower; and/OR (2) 36 GRAMS OF DELTA-9-TETRAHYDROCANNABINOL (THC) contained in CANNABIS PRODUCTS. The requirement to limit patient purchases through the allotment system ends as of the effective date of this bill.

Amendment 7: Home grow provisions

(Page 36) Title 36-302 (B) says

- (1) A QUALIFYING PATIENT WHO IS AT LEAST 21 YEARS OLD MAY NOT CULTIVATE MORE THAN FOUR CANNABIS PLANTS.
- (2) IF TWO OR MORE QUALIFYING PATIENTS WHO ARE AT LEAST 21 YEARS OLD RESIDE AT THE SAME RESIDENCE, NOT MORE THAN FOUR CANNABIS PLANTS MAY BE CULTIVATED AT THAT RESIDENCE.

The home grow provisions are not sufficient for medical patients. This amendment requests the following provisions:

- (1) A QUALIFYING PATIENT WHO IS AT LEAST 21 YEARS OLD MAY NOT CULTIVATE MORE THAN six flowering CANNABIS or hemp PLANTS and 6 non-flowering cannabis or hemp plants.
- (2) IF TWO OR MORE QUALIFYING PATIENTS WHO ARE AT LEAST 21 YEARS OLD RESIDE AT THE SAME RESIDENCE, NOT MORE THAN twelve flowering CANNABIS or hemp PLANTS and twelve non-flowering cannabis or hemp plants MAY BE CULTIVATED AT THAT RESIDENCE.
- (3) Any home cultivator may possess any amount of cannabis flower or cannabis product produced from cannabis cultivated the property. Such cannabis may either be consumed on the property or distributed via sharing of personal use amounts.
- (4) Any home cultivator may access cannabis testing services
- (5) Sales of cannabis seeds and clones are allowed to adults over 21 years of age by licensed dispensaries. (House Amendment 9)

Amendment 8: new edibles rules

(Page 69) Title 36-1103 (A) (1) states:

(A) (1) A PERSON MAY NOT SELL OR DISTRIBUTE A PRODUCT INTENDED FOR HUMAN CONSUMPTION OR INHALATION THAT CONTAINS MORE THAN 0.5 MILLIGRAMS OF TETRAHYDROCANNABINOL PER SERVING OR 2.5 MILLIGRAMS OF TETRAHYDROCANNABINOL PER PACKAGE UNLESS THE PERSON IS LICENSED UNDER 27 § 36–401 OF THIS TITLE AND THE PRODUCT COMPLIES WITH THE:

(I) MANUFACTURING STANDARDS ESTABLISHED UNDER § 29 36–203 OF THIS TITLE;

(II) LABORATORY TESTING STANDARDS ESTABLISHED UNDER § 2 36–203 OF THIS TITLE; AND

(III) PACKAGING AND LABELING STANDARDS ESTABLISHED 4 UNDER § 36–203 OF THIS TITLE.

This title is intended to stop the marketing of hemp derived products capable of intoxication. At the least it needs to be clear that this title does not apply to sharing. The hemp industry has already objected strenuously to this title banning products that are currently legal. This amendment requests that title 36-1103 A) 1) be struck.

It should be noted that this bill does not restrict the selling of high dose (>10mg/serving) edibles to adult use customers. Presumably that will be done by regulation, but a statute should be considered to formalize the intent of the edibles regulations that were implemented for medical.

Amendment 9: Consistent weight measurement system

All weight references should use one measurement system consistently. This amendment requests the weight limit for processors to be defined as 454 KG instead of 1,000 pounds. (page 37) Title 36-401 C) 1) ii) and C) 2) ii)

Amendment 10: Jail use – allow topical use

(page 69) Title 36-1102 A) (5)

POSSESS CANNABIS, INCLUDING CANNABIS PRODUCTS, IN A LOCAL DETENTION FACILITY, COUNTY JAIL, STATE PRISON, REFORMATORY, OR OTHER CORRECTIONAL FACILITY, INCLUDING A FACILITY FOR THE DETENTION OF JUVENILE OFFENDERS.

This amendment requests an exception for cannabis products designed for topical use.

Amendment 11: On site consumption

(Page 50) Title 36-407 F) 6)

AN ON–SITE CONSUMPTION ESTABLISHMENT MAY NOT:

6) ALLOW THE USE OR CONSUMPTION OF CANNABIS BY A PATRON WHO DISPLAYS ANY VISIBLE SIGNS OF INTOXICATION;

The purpose of onsite consumption is to get intoxicated. A safety plan to prevent overserving customers should be regulated like establishments that serve alcohol. House Amendment 12 requests a study on

onsite regulations. This bill should not preclude the results of that study. This amendment requests that this line be stricken.

Amendment 12: Non-profit cultivation license.

This amendment requests a new subclass of micro cultivation license to allow non-profit organizations to cultivate and distribute cannabis products free of charge to those in need (e.g. veterans)

Amendment 13: Public education –5% for public health fund for 3 years

We are about to turn cannabis loose among the public in a move that is equivalent to handing a new driver the keys to a Maserati and telling them to go learn how to drive on the Beltway. New cannabis users need to have mentors to guide them through a safe introduction to cannabis. Currently dispensaries have medical directors and training for dispensary staff to assist new patients, but new patients have little awareness of these resources and few dispensaries reach out to push this information to new customers. We need a massive consumer outreach program to begin educating the public about cannabis. Delegate Grammar asked the question “What does legalization tell our kids?” Answering that question is going to cost a lot more than 1.5%. This amendment requests that funding allocation for the Cannabis Public Health Fund be set at 5% of revenues for the first 3 years.

Page 80 title 2-1302.2 amend item 4 to read

FOR FISCAL YEARS 2024 THROUGH 2026 5% to the 1.5% TO THE CANNABIS PUBLIC HEALTH FUND ESTABLISHED UNDER § 13-4505 OF THE HEALTH – GENERAL ARTICLE and 1.5% TO THE CANNABIS PUBLIC HEALTH FUND thereafter;

Amendment 14: Remove license caps

There are thousands of locations that are licensed to sell alcohol, tobacco or prescription drug products. The license caps have no practical value as a permanent cap that can never be reached. This amendment requests (page 37) title 36-401 Section D be stricken. Concurrent with amendment 1, this section is not necessary.

Amendment 14: Farm license

Cannabis farms should be able to host events equivalent to winery tours. This requires a license type that allows cultivation, processing and retail sales. There are several provisions in this bill that would prohibit such events. This amendment requests a “farm” type license that would allow the cannabis equivalent of winery tours.

Amendment 15: D8 ban

(page 70) Title 36-1103. B

) A PERSON MAY NOT SELL OR DISTRIBUTE A CANNABINOID PRODUCT THAT IS NOT DERIVED FROM NATURALLY OCCURRING BIOLOGICALLY ACTIVE CHEMICAL CONSTITUENTS.

This text does not make a distinction between Delta-8 products made directly from naturally occurring constituents and Delta-8 products that are derived from natural constituents (i.e. unnaturally altered). If the intent was to ban hemp products spiked with chemically created D8 distillate, this title will not do that. This is a complex topic that is difficult to address from this angle. An alternative is to address D8 products specifically and synthetic "production" more generally. I offer to work with the sponsors to develop specific language if this section gets modified.

Delta 8 products have medical use. Delta 8 products should be tested, not banned. Licensed dispensaries should be allowed to sell D8 products. Licensed hemp farmers should be given special licenses to allow them to continue to sell D8 products.

Amendment 16: - Remove shelf space requirement

House Amendment #9 contains the following additional text

On page 55, in line 2, after "CAREGIVERS" insert "; AND
(3) ENSURE THAT SHELF SPACE IN THE DISPENSARY IS AVAILABLE
FOR CANNABIS AND CANNABIS PRODUCTS FROM GROWERS AND PROCESSORS
THAT DO NOT SHARE COMMON OWNERSHIP WITH THE DISPENSARY";

This language is vague, easily circumvented, is attempting to prevent a problem that does not exist and is a problem that cannot be created under round 1 licensing. Since it was introduced on the floor as "other technical fixes", either further clarification should be required or this amendment should be stricken.

Thank you,
Rusty Carr

MCT-for-Posting-OFTKL2250-221017A.pdf

Uploaded by: Ian Swain

Position: UNF

CERTIFICATE OF ANALYSIS

PRODUCT NAME: Organic CBD Full Spectrum Tincture - Key Lime
PRODUCT STRENGTH: 2250mg
TINCTURE BATCH: 221017A
BEST BY DATE: 2/23/2024
HEMP EXTRACT LOT: BCA-000409-220624

Physical Attributes

Test	Method	Specification	Results
Color	Internal	Golden to Amber	PASS
Odor	Internal	Characteristic - Coconut and Hemp - Lime	PASS
Appearance	Internal	Golden to Amber oil in brown glass bottle with dropper.	PASS
Primary Package Eval.	Internal	Container clean and free of filth. Container caps tight and shrink bands intact	PASS
Secondary Package Eval.	Internal	Labeling Compliance Checked, Cartons sturdy and clean. Sufficient cushion material exists. Box taped and secure.	PASS

Review of Third-Party Analysis

Panel	Method	Specification	Results*	Pass/Fail
Potency - Total CBD	HPLC-UV DAD	*NLT (product strength) mg / bottle	2314mg	PASS
Potency - D9-THC	HPLC-UV DAD	LOQ: 10 ppm (.001-0.3%)	795mg	PASS
Expanded Pesticide Panel	HPLC-QQQ	LOQ: Complies with CDPHE 6 CCR 1010-21 Industrial Hemp Extract	ND	PASS
Microbial Escherichia coli (STEC)	PCR	Complies with CDPHE 6 CCR 1010-21 - LOQ 1 CFU/25 gram	Below LOQ	PASS
Microbial Salmonella	PCR	Complies with CDPHE 6 CCR 1010-21 - LOQ 1 CFU/25 gram	Below LOQ	PASS
Microbial Yeast and Mold	Culture Plating	Complies with CDPHE 6 CCR 1010-21 - LOQ 10 ² CFU/gram	Below LOQ	PASS
Microbial Total Coliforms*	Culture Plating	Complies with CDPHE 6 CCR 1010-21 - LOQ 10 ² CFU/gram	Below LOQ	PASS
Microbial Total Aerobic Count*	Culture Plating	Complies with CDPHE 6 CCR 1010-21 - LOQ 10 ³ CFU/gram	Below LOQ	PASS
Heavy Metals Panel	ICP-MS	Arsenic (As): ≤1.5 ppm Cadmium (Cd): ≤0.5 ppm Lead (Pb): ≤0.5 ppm Mercury (Hg): ≤1.5 ppm	ND	PASS
Mycotoxins	ICP-MS	Total Aflatoxins <20 ppb† Aflatoxin B1 < 5 ppb Ochratoxin < 5ppb	ND	PASS
Residual Solvents	GC-HS-MSD	LOQ: Complies with CDPHE 6 CCR 1010-21 Industrial Hemp Extract	ND	PASS

*Level of Quantitation, † Parts Per Million ‡ Part Per Billion
 CFU/g=Colony Forming Units per Gram
 *Nothing Less Than
 10²=100 CFU
 10³=1,000 CFU

Quality Certified

Name



10/28/22

Date



12423 NE Whitaker Way
Portland, OR 97230
503-254-1794



Report Number: 22-007617/D003.R000
Report Date: 07/07/2022
ORELAP#: OR100028
Purchase Order:
Received: 06/29/22 11:00

Product identity: OFTKL2250-221017A
Client/Metric ID: BCA-000409-220624 .
Laboratory ID: 22-007617-0001

Summary

Potency:

Analyte	Result	Limits	Units	Status	
CBC	0.0211		%		CBD-Total per 1g
CBD	8.12		%		81.2 mg/1g
CBDV [†]	0.0360		%		THC-Total per 1g
CBE [†]	0.0973		%		2.79 mg/1g
CBG [†]	0.439		%		(Reported in milligrams per serving)
CBL [†]	0.0145		%		
CBN	0.0227		%		
CBT [†]	0.345		%		
Δ9-THC	0.279		%		
Analyte per 1g	Result	Limits	Units	Status	
CBC per 1g [†]	0.211		mg/1g		
CBD per 1g	81.2		mg/1g		
CBDV per 1g [†]	0.360		mg/1g		
CBE per 1g [†]	0.973		mg/1g		
CBG per 1g [†]	4.39		mg/1g		
CBL per 1g [†]	0.145		mg/1g		
CBN per 1g	0.227		mg/1g		
CBT per 1g [†]	3.45		mg/1g		
Δ9-THC per 1g	2.79		mg/1g		

Residual Solvents:

All analytes passing and less than LOQ.

Pesticides:

All analytes passing and less than LOQ.

Metals:

Less than LOQ for all analytes.

Microbiology:

Less than LOQ for all analytes.

OFTKL2250

Batch ID or Lot Number: 221017A	Test: Microbial Contaminants	Reported: 21Oct2022	USDA License: N/A
Matrix: Finished Product	Test ID: T000224972	Started: 18Oct2022	Sampler ID: N/A
	Method(s): TM25 (qPCR) TM24, TM26, TM27 (Culture Plating): Microbial (Colorado Panel)	Received: 18Oct2022	Status: Active

Microbial Contaminants

Contaminants	Method	LOD	Quantitation Range	Result	Notes
STEC	TM25: PCR	10 ⁰ CFU/25g	NA	Absent	Free from visual mold, mildew, and foreign matter
<i>Salmonella</i>	TM25: PCR	10 ⁰ CFU/25g	NA	Absent	
Total Yeast and Mold*	TM24: Culture Plating	10 ¹ CFU/g	1.0x10 ² - 1.5x10 ⁴	None Detected	
Total Aerobic Count*	TM26: Culture Plating	10 ² CFU/g	1.0x10 ³ - 1.5x10 ⁵	None Detected	
Total Coliforms*	TM27: Culture Plating	10 ¹ CFU/g	1.0x10 ² - 1.5x10 ⁴	None Detected	

Final Approval



Eden Thompson-Wright
21Oct2022
03:19:00 PM MDT

PREPARED BY / DATE



Brianne Maillot
21Oct2022
04:17:00 PM MDT

APPROVED BY / DATE



<https://results.botanacor.com/api/v1/coas/uuid/a77cba68-f15f-4647-8782-950e9693eb54>

Definitions

* Values recorded in scientific notation, a common microbial practice of expressing numbers that are too large to be conveniently written in decimal form. Examples: 10² = 100 CFU, 10³ = 1,000 CFU, 10⁴ = 10,000 CFU, 10⁵ = 100,000 CFU
CFU/g = Colony Forming Units per Gram, LOD = Limit of Detection
ULOQ = Upper Limit of Quantitation, LLOQ = Lower Limit of Quantitation
STEC = Shiga Toxin-Producing E. coli

Testing results are based solely upon the sample submitted to SC Laboratories, Inc., in the condition it was received. SC Laboratories, Inc., warrants that all analytical work is conducted professionally in accordance with all applicable standard laboratory practices using validated methods. Data was generated using an unbroken chain of comparison to NIST traceable Reference Standards and Certified Reference Materials. This report may not be reproduced, except in full, without the written approval of SC Laboratories, Inc. ISO/IEC 17025:2017 Accredited by A2LA.



Cert #4329.02

CDPHE Certified

a77cba68f15f46478782950e9693eb54.1



12423 NE Whitaker Way
 Portland, OR 97230
 503-254-1794



Report Number: 22-007617/D003.R000
Report Date: 07/07/2022
ORELAP#: OR100028
Purchase Order:
Received: 06/29/22 11:00

Product identity: BCA-000409-220624 .
Client/Metric ID:
Sample Date: OFTKL2250-221017A
Laboratory ID:
Evidence of Cooling: 22-007617-0001
Temp: Relinquished No
by: Serving Size #1: 26.2 °C
 UPS
 1 g

Sample Results

Potency	Method: J AOAC 2015 V98-6 (mod)		Units %	Batch: 2205650	Analyze: 7/2/22 3:45:00 AM
Analyte	Result	Limits	Units	LOQ	Notes
CBC	0.0211		%	0.00321	
CBC-A†	< LOQ		%	0.00321	
CBC-Total†	0.0211		%	0.00603	
CBD	8.12		%	0.0321	
CBD-A	< LOQ		%	0.00321	
CBD-Total	8.12		%	0.0349	
CBDV†	0.0360		%	0.00321	
CBDV-A†	< LOQ		%	0.00321	
CBDV-Total†	0.0360		%	0.00600	
CBE†	0.0973		%	0.00321	
CBG†	0.439		%	0.00321	
CBG-A†	< LOQ		%	0.00321	
CBG-Total	0.439		%	0.00600	
CBL†	0.0145		%	0.00321	
CBL-A†	< LOQ		%	0.00321	
CBL-Total†	0.0145		%	0.00603	
CBN	0.0227		%	0.00321	
CBT†	0.345		%	0.00321	
Δ8-THCV	< LOQ		%	0.00321	
Δ8-THC	< LOQ		%	0.00321	
Δ9-THC	0.279		%	0.00321	
exo-THC	< LOQ		%	0.00321	
THC-A	< LOQ		%	0.00321	
THC-Total	0.279		%	0.00603	
THCV†	< LOQ		%	0.00321	
THCV-A†	< LOQ		%	0.00321	
THCV-Total†	< LOQ		%	0.00600	
Total Cannabinoids†	9.37		%		

Potency per 1g	Method: J AOAC 2015 V98-6 (mod)		Units mg/se	Batch: 2205650	Analyze: 7/2/22 3:45:00 AM
Analyte	Result	Limits	Units	LOQ	Notes
CBC per 1g†	0.211		mg/1g	0.0321	



12423 NE Whitaker Way
Portland, OR 97230
503-254-1794



Report Number: 22-007617/D003.R000
Report Date: 07/07/2022
ORELAP#: OR100028
Purchase Order:
Received: 06/29/22 11:00

Potency per 1g Method: J AOAC 2015 V98-6 (mod) Units mg/se Batch: 2205650 Analyze: 7/2/22 3:45:00 AM

Analyte	Result	Limits	Units	LOQ	Notes
CBC-A per 1g [†]	< LOQ		mg/1g	0.0321	
CBC-Total per 1g [†]	0.211		mg/1g	0.0603	
CBD per 1g	81.2		mg/1g	0.321	
CBD-A per 1g	< LOQ		mg/1g	0.0321	
CBD-Total per 1g	81.2		mg/1g	0.349	
CBDV per 1g [†]	0.360		mg/1g	0.0321	
CBDV-A per 1g [†]	< LOQ		mg/1g	0.0321	
CBDV-Total per 1g [†]	0.360		mg/1g	0.0600	
CBE per 1g [†]	0.973		mg/1g	0.0321	
CBG per 1g [†]	4.39		mg/1g	0.0321	
CBG-A per 1g [†]	< LOQ		mg/1g	0.0321	
CBG-Total per 1g [†]	4.39		mg/1g	0.0600	
CBL per 1g [†]	0.145		mg/1g	0.0321	
CBL-A per 1g [†]	< LOQ		mg/1g	0.0321	
CBL-Total per 1g [†]	0.145		mg/1g	0.0603	
CBN per 1g	0.227		mg/1g	0.0321	
CBT per 1g [†]	3.45		mg/1g	0.0321	
Δ8-THCV per 1g [†]	< LOQ		mg/1g	0.0321	
Δ8-THC per 1g [†]	< LOQ		mg/1g	0.0321	
Δ9-THC per 1g	2.79		mg/1g	0.0321	
exo-THC per 1g [†]	< LOQ		mg/1g	0.0321	
THC-A per 1g	< LOQ		mg/1g	0.0321	
THC-Total per 1g	2.79		mg/1g	0.0603	
THCV per 1g [†]	< LOQ		mg/1g	0.0321	
THCV-A per 1g [†]	< LOQ		mg/1g	0.0321	
THCV-Total per 1g [†]	< LOQ		mg/1g	0.0603	
Total Cannabinoids per 1g	93.7		mg/1g		

Microbiology

Analyte	Result	Limits	Units	LOQ	Batch	Analyze	Method	Status	Notes
Aerobic Plate Count	< LOQ	10,000.00	cfu/g	10	2205548	07/02/22	AOAC 990.12 (Petrifilm)	pass	X
E.coli	< LOQ	100.00	cfu/g	10	2205546	07/02/22	AOAC 991.14 (Petrifilm)	pass	X
Total Coliforms	< LOQ	100.00	cfu/g	10	2205546	07/02/22	AOAC 991.14 (Petrifilm)	pass	X
Mold (RAPID Petrifilm)	< LOQ	1,000.00	cfu/g	10	2205547	07/03/22	AOAC 2014.05 (RAPID)	pass	X
Yeast (RAPID Petrifilm)	< LOQ	1,000.00	cfu/g	10	2205547	07/03/22	AOAC 2014.05 (RAPID)	pass	X
Salmonella spp. by PCR	Negative		/25g		2205551	07/01/22	AOAC 2020.02		X
EHEC including STEC	Negative		/25g		2205553	07/01/22	AOAC RI 121806		X



12423 NE Whitaker Way
 Portland, OR 97230
 503-254-1794



Report Number: 22-007617/D003.R000
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Received: 06/29/22 11:00

Solvents											Method: Residual Solvents by GC/MS					Units µg/g	Batch 2205605	Analyze 07/01/22 12:42 PM				
Analyte	Result	Limits	LOQ	Status	Notes	Analyte	Result	Limits	LOQ	Status	Notes											
2-Methylbutane	< LOQ	1000	200	pass		2-Methylpentane	< LOQ	60.0	30.0	pass												
2-Propanol (IPA)	< LOQ	1000	200	pass		2,2-Dimethylbutane	< LOQ	60.0	30.0	pass												
2,2-Dimethylpropane	< LOQ	1000	200	pass		2,3-Dimethylbutane	< LOQ	60.0	30.0	pass												
3-Methylpentane	< LOQ	60.0	30.0	pass		Acetone	< LOQ	1000	200	pass												
Benzene	< LOQ	2.00	1.00	pass		Butanes (sum)	< LOQ	1000	400	pass												
Ethanol ¹	< LOQ	1000	200	pass		Ethyl acetate	< LOQ	1000	200	pass												
Hexanes (sum)	< LOQ	60.0	150	pass		m,p-Xylene	< LOQ	430	200	pass												
Methanol	< LOQ	600	200	pass		Methylpropane	< LOQ	1000	200	pass												
n-Butane	< LOQ	1000	200	pass		n-Heptane	< LOQ	1000	200	pass												
n-Hexane	< LOQ	60.0	30.0	pass		n-Pentane	< LOQ	1000	200	pass												
o-Xylene	< LOQ	430	200	pass		Pentanes (sum)	< LOQ	1000	600	pass												
Propane	< LOQ	1000	200	pass		Toluene	< LOQ	180	100	pass												
Total Xylenes	< LOQ	430	400	pass																		



12423 NE Whitaker Way
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503-254-1794



Report Number: 22-007617/D003.R000
Report Date: 07/07/2022
ORELAP#: OR100028
Purchase Order:
Received: 06/29/22 11:00

Pesticides											
Method: AOAC 2007.01 & EN 15662 (mod)						Units mg/kg		Batch 2205582		Analyze 06/30/22 04:15 PM	
Analyte	Result	Limits	LOQ	Status	Notes	Analyte	Result	Limits	LOQ	Status	Notes
Abamectin	< LOQ	0.25	0.070	pass		Acephate	< LOQ	0.050	0.020	pass	
Acequinocyl	< LOQ	0.030	0.025	pass		Acetamidrid	< LOQ	0.050	0.050	pass	
Aldicarb	< LOQ	0.50	0.100	pass		Allethrin	< LOQ	0.10	0.100	pass	
Atrazine	< LOQ	0.0250	0.025	pass		Azadirachtin	< LOQ	1.0	0.500	pass	
Azoxystrobin	< LOQ	0.010	0.010	pass		Benzovindiflupyr	< LOQ	0.010	0.010	pass	
Bifenazate	< LOQ	0.010	0.010	pass		Bifenthrin	< LOQ	1.0	0.100	pass	
Boscalid	< LOQ	0.010	0.010	pass		Buprofezin	< LOQ	0.020	0.010	pass	
Carbaryl	< LOQ	0.025	0.025	pass		Carbofuran	< LOQ	0.010	0.010	pass	
Chlorantraniliprole	< LOQ	0.020	0.010	pass		Chlorfenapyr	< LOQ	1.5	0.100	pass	
Chlorpyrifos	< LOQ	0.50	0.010	pass		Clofentezine	< LOQ	0.010	0.010	pass	
Clothianidin	< LOQ	0.025	0.025	pass		Coumaphos	< LOQ	0.010	0.010	pass	
Cyantraniliprole	< LOQ	0.010	0.010	pass		Cyfluthrin	< LOQ	0.20	0.200	pass	
Cyhalothrin,lambda	< LOQ	0.0200	0.250	pass		Cypermethrin	< LOQ	0.30	0.300	pass	
Cyprodinil	< LOQ	0.010	0.010	pass		Daminozide	< LOQ	0.10	0.050	pass	
Deltamethrin	< LOQ	0.50	0.500	pass		Diazinon	< LOQ	0.020	0.010	pass	
Dichlorvos	< LOQ	0.050	0.050	pass		Dimethoate	< LOQ	0.010	0.010	pass	
Dimethomorph	< LOQ	0.050	0.050	pass		Dinotefuran	< LOQ	0.050	0.050	pass	
Diuron	< LOQ	0.125	0.125	pass		Dodemorph	< LOQ	0.050	0.050	pass	
Endosulfan I (alpha)	< LOQ	2.5	0.050	pass		Endosulfan II (beta)	< LOQ	2.5	0.050	pass	
Endosulfan sulfate	< LOQ	2.5	0.050	pass		Ethoprophos	< LOQ	0.010	0.010	pass	
Etofenprox	< LOQ	0.050	0.010	pass		Etozazole	< LOQ	0.020	0.010	pass	
Etridiazole	< LOQ	0.15	0.050	pass		Fenhexamid	< LOQ	0.13	0.100	pass	
Fenoxycarb	< LOQ	0.010	0.010	pass		Fenpyroximate	< LOQ	0.020	0.020	pass	
Fensulfothion	< LOQ	0.010	0.010	pass		Fenthion	< LOQ	0.010	0.010	pass	
Fenvalerate	< LOQ		0.200			Fipronil	< LOQ	0.010	0.010	pass	
Flonicamid	< LOQ	0.025	0.025	pass		Fludioxonil	< LOQ	0.010	0.010	pass	
Fluopyram	< LOQ	0.010	0.010	pass		Hexythiazox	< LOQ	0.010	0.010	pass	
Imazalil	< LOQ	0.010	0.010	pass		Imidacloprid	< LOQ	0.010	0.010	pass	
Iprodione	< LOQ	0.50	0.500	pass		Kinoprene	< LOQ	1.3	0.200	pass	
Kresoxim-methyl	< LOQ	0.15	0.010	pass		Malathion	< LOQ	0.010	0.010	pass	
Metalaxyl	< LOQ	0.010	0.010	pass		Methiocarb	< LOQ	0.010	0.010	pass	
Methomyl	< LOQ	0.025	0.025	pass		Methoprene	< LOQ	2.0	1.00	pass	
Mevinphos	< LOQ	0.025	0.025	pass		MGK-264	< LOQ	0.050	0.050	pass	
Myclobutanil	< LOQ	0.010	0.010	pass		Naled	< LOQ	0.10	0.100	pass	
Novaluron	< LOQ	0.025	0.025	pass		Oxamyl	< LOQ	1.5	0.500	pass	
Paclbutrazole	< LOQ	0.010	0.010	pass		Parathion-Methyl	< LOQ	0.050	0.030	pass	
Permethrin	< LOQ	0.50	0.040	pass		Phenothrin	< LOQ	0.050	0.025	pass	
Phosmet	< LOQ	0.020	0.010	pass		Piperonyl butoxide	< LOQ	1.3	0.200	pass	
Pirimicarb	< LOQ	0.010	0.010	pass		Prallethrin	< LOQ	0.050	0.050	pass	
Propiconazole	< LOQ	0.10	0.010	pass		Propoxur	< LOQ	0.010	0.010	pass	
Pyraclostrobin	< LOQ	0.010	0.010	pass		Pyrethrins (total)	< LOQ	0.050	0.025	pass	
Pyridaben	< LOQ	0.020	0.020	pass		Pyriproxyfen	< LOQ	0.0100	0.010	pass	
Quintozene	< LOQ	0.020	0.020	pass		Resmethrin	< LOQ	0.050	0.020	pass	
Spinetoram	< LOQ	0.010	0.010	pass		Spinosad	< LOQ	0.010	0.010	pass	
Spirodiclofen	< LOQ	0.25	0.250	pass		Spiromesifen	< LOQ	3.0	0.030	pass	
Spirotetramat	< LOQ	0.010	0.010	pass		Spiroxamine	< LOQ	0.10	0.010	pass	



12423 NE Whitaker Way
Portland, OR 97230
503-254-1794



Report Number: 22-007617/D003.R000
Report Date: 07/07/2022
ORELAP#: OR100028
Purchase Order:
Received: 06/29/22 11:00

Pesticides											
Method: AOAC 2007.01 & EN 15662 (mod)											
Units mg/kg Batch 2205582 Analyze 06/30/22 04:15 PM											
Analyte	Result	Limits	LOQ	Status	Notes	Analyte	Result	Limits	LOQ	Status	Notes
Tebuconazole	< LOQ	0.010	0.010	pass		Tebufenozide	< LOQ	0.010	0.010	pass	
Teflubenzuron	< LOQ	0.025	0.025	pass		Tetrachlorvinphos	< LOQ	0.010	0.010	pass	
Tetramethrin	< LOQ	0.10	0.050	pass		Thiacloprid	< LOQ	0.010	0.010	pass	
Thiamethoxam	< LOQ	0.010	0.010	pass		Thiophanate-Methyl	< LOQ	0.050	0.030	pass	
Trifloxystrobin	< LOQ	0.010	0.010	pass							

Metals										
Analyte	Result	Limits	Units	LOQ	Batch	Analyze	Method	Status	Notes	
Arsenic	< LOQ	1.50	mg/kg	0.0978	2205591	06/30/22	AOAC 2013.06 (mod.)	pass	X	
Cadmium	< LOQ	0.50	mg/kg	0.0978	2205591	06/30/22	AOAC 2013.06 (mod.)	pass	X	
Lead	< LOQ	0.50	mg/kg	0.0978	2205591	06/30/22	AOAC 2013.06 (mod.)	pass	X	
Mercury	< LOQ	1.50	mg/kg	0.0489	2205591	06/30/22	AOAC 2013.06 (mod.)	pass	X	

Mycotoxins										
Analyte	Result	Limits	Units	LOQ	Batch	Analyze	Method	Status	Notes	
Aflatoxin B2†	< LOQ	5.00	µg/kg	5.00	2205724	07/07/22	AOAC 2007.01 & EN	pass		
Aflatoxin B1†	< LOQ	5.00	µg/kg	5.00	2205724	07/07/22	AOAC 2007.01 & EN	pass		
Aflatoxin G1†	< LOQ	5.00	µg/kg	5.00	2205724	07/07/22	AOAC 2007.01 & EN	pass		
Aflatoxin G2†	< LOQ	5.00	µg/kg	5.00	2205724	07/07/22	AOAC 2007.01 & EN	pass		
Ochratoxin A†	< LOQ	5.00	µg/kg	5.00	2205724	07/07/22	AOAC 2007.01 & EN	pass		
Ochratoxin B†	< LOQ		µg/kg	2.00	2205724	07/07/22	AOAC 2007.01 & EN			

MCT-GUMBB5-Various-Lots-Exp-05.06.2024.pdf

Uploaded by: Ian Swain

Position: UNF

Certificate of Analysis

PRODUCT NAME: THC:CBD Gummies
PRODUCT STRENGTH: 25mg CBD, 5mg THC
BATCH: Various lots based on Exp date 05/06/2024
BEST BY DATE: 5/6/2024
EXTRACT LOT: 00635

Physical Attributes

Test	Method	Specification	Results
Color	Internal	Multicolored	PASS
Odor	Internal	Sweet	PASS
Appearance	Internal	Sugar Coated	PASS
Primary Package Eval.	Internal	Container clean and free of filth. Container caps tight and seals intact	PASS
Secondary Package Eval.	Internal	Labeling Compliance Checked, Sufficient cushion material exists. Box taped and secure.	PASS

Review of Third-Party Analysis

Panel	Method	Specification	Results*	Pass/Fail
Potency - Total CBD	HPLC-UV DAD	*LOQ: ≥ 10 mg / gummy	32.4 mg	PASS
Potency - D9-THC	HPLC-UV DAD	LOQ: $<0.01\%$ (broad spectrum)	6.6mg	PASS
Expanded Pesticide Panel	HPLC-QQQ	LOQ: Complies with CDPHE 6 CCR 1010-21 Industrial Hemp Extract	Below LOQ	PASS
Microbial Escherichia coli (STEC)	PCR	Complies with CDPHE 6 CCR 1010-21 - LOQ 1 **CFU/25	Absent	PASS
Microbial Salmonella	PCR	Complies with CDPHE 6 CCR 1010-21 - LOQ 1 CFU/25 gram	Absent	PASS
Microbial Yeast and Mold	Culture Plating	Complies with CDPHE 6 CCR 1010-21 - LOQ 10^2 CFU/gram	Below LOQ	PASS
Microbial Total Coliforms*	Culture Plating	Complies with CDPHE 6 CCR 1010-21 - LOQ 10^2 CFU/gram	Below LOQ	PASS
Microbial Total Aerobic Count*	Culture Plating	Complies with CDPHE 6 CCR 1010-21 - LOQ 10^3 CFU/gram	Below LOQ	PASS
Heavy Metals	ICP-MS	Arsenic (As): ≤ 1.5 ppm† Cadmium (Cd): ≤ 0.5 ppm Lead (Pb): ≤ 0.5 ppm Mercury (Hg): ≤ 1.5 ppm	Below LOQ	PASS
Mycotoxins	ICP-MS	Total Aflatoxins <20 ppb†† Aflatoxin B1 < 5 ppb Ochratoxin < 5 ppb	Below LOQ	PASS
Residual Solvents	GC-HS-MSD	LOQ: Complies with CDPHE 6 CCR in effect during MFG*	Below LOQ	PASS

*Level of Quantification
 **Colony Forming Units per Gram
 † Parts Per Million †† Part Per Billion

Values expressed in scientific notation.
 Examples:
 $10^2=100$
 $10^3=1,000$

Quality Certified

5/12/22

Date

5:1 25mg Blueberry Lemonade Mother Liquor

Batch ID or Lot Number: 00635	Test, Test ID and Methods: Various	Matrix: Unit	Page 1 of 1
Reported: 04May2022	Started: 04May2022	Received: 04May2022	

Cannabinoids - Colorado Compliance

Test ID: T000205888
Methods: TM14 (HPLC-DAD): Potency – Standard

Cannabinoid Analysis	LOD (mg)	LOQ (mg)	Result (mg)	Result (mg/g)	Notes
Cannabichromene (CBC)	0.248	0.774	5.230	1.58	# of Servings = 1 Sample Weight=3.3g
Cannabichromenic Acid (CBCA)	0.226	0.708	ND	ND	
Cannabidiol (CBD)	0.653	2.067	32.413	9.82	
Cannabidiolic Acid (CBDA)	0.670	2.120	ND	ND	
Cannabidivarin (CBDV)	0.154	0.489	0.601	0.18	
Cannabidivarinic Acid (CBDVA)	0.279	0.884	ND	ND	
Cannabigerol (CBG)	0.141	0.439	3.011	0.91	
Cannabigerolic Acid (CBGA)	0.588	1.836	ND	ND	
Cannabinol (CBN)	0.183	0.573	1.003	0.30	
Cannabinolic Acid (CBNA)	0.401	1.253	ND	ND	
Delta 8-Tetrahydrocannabinol (Delta 8-THC)	0.700	2.187	ND	ND	
Delta 9-Tetrahydrocannabinol (Delta 9-THC)	0.636	1.987	6.613	2.00	
Delta 9-Tetrahydrocannabinolic Acid (THCA-A)	0.563	1.760	ND	ND	
Tetrahydrocannabivarin (THCV)	0.128	0.400	ND	ND	
Tetrahydrocannabivarinic Acid (THCVA)	0.497	1.553	ND	ND	
Total Cannabinoids			48.871	14.81	
Total Potential THC			6.613	2.00	
Total Potential CBD			32.413	9.82	

Final Approval

Samantha Smith
Sam Smith
04May2022
03:44:00 PM MDT
PREPARED BY / DATE

Jacob Miller
Jacob Miller
04May2022
03:53:00 PM MDT
APPROVED BY / DATE



<https://results.botanacor.com/api/v1/coas/uuid/d63697ce-a34e-435b-8185-7a812d85645d>

Definitions
LOD = Limit of Detection, ULOQ = Upper Limit of Quantitation, LLOQ = Lower Limit of Quantitation, PPB = Parts per Billion, % = % (w/w) = Percent (weight of analyte / weight of product). ND = None Detected (defined by dynamic range of the method). Total Potential Delta 9-THC or CBD is calculated to take into account the loss of a carboxyl group during decarboxylation step, using the following formulas: Total Potential Delta 9-THC = Delta 9-THC + (Delta 9-THCa *(0.877)) and Total CBD = CBD + (CBDa *(0.877)). Fail equates to a concentration level of Delta 9-THC, on a dry weight basis, higher than 0.3 percent + or - the measurement uncertainty. Total Potential THC is calculated using the following formulas to take into account the loss of a carboxyl group during decarboxylation step. Total THC = THC + (THCa *(0.877)). ALOQ = Above Limit Of Quantitation (defined by dynamic range of the method), CFU/g = Colony Forming Units per Gram. Values recorded in scientific notation, a common microbial practice of expressing numbers that are too large to be conveniently written in decimal form. Examples: 10^2 = 100 CFU, 10^3 = 1,000 CFU, 10^4 = 10,000 CFU, 10^5 = 100,000 CFU.

Testing results are based solely upon the sample submitted to Botanacor Laboratories, LLC, in the condition it was received. Botanacor Laboratories, LLC warrants that all analytical work is conducted professionally in accordance with all applicable standard laboratory practices using validated methods. Data was generated using an unbroken chain of comparison to NIST traceable Reference Standards and Certified Reference Materials. This report may not be reproduced, except in full, without the written approval of Botanacor Laboratories, LLC. ISO/IEC 17025:2017 Accredited by A2LA. Some tests listed on this COA may not be within our scope of A2LA accreditation. Please visit [A2LA for more details](#).




Cert #4329.02
d63697cea34e435b81857a812d85645d.1

Pineapple 5:1 ML Gummies 25mg CBD + 5mg THC

Batch ID or Lot Number: Lot: 00633	Test: Potency	Reported: 04May2022	USDA License: N/A
Matrix: Unit	Test ID: T000205882	Started: 04May2022	Sampler ID: N/A
	Method(s): TM14 (HPLC-DAD): Potency – Standard Cannabinoid Analysis	Received: 04May2022	Status: Active

Cannabinoids	LOD (mg)	LOQ (mg)	Result (mg)	Result (mg/g)	Notes
Cannabichromene (CBC)	0.252	0.786	5.079	1.54	# of Servings = 1 Sample Weight=3.3g
Cannabichromenic Acid (CBCA)	0.230	0.719	ND	ND	
Cannabidiol (CBD)	0.664	2.101	31.432	9.52	
Cannabidiolic Acid (CBDA)	0.681	2.155	ND	ND	
Cannabidivarin (CBDV)	0.157	0.497	0.546	0.17	
Cannabidivarinic Acid (CBDVA)	0.284	0.899	ND	ND	
Cannabigerol (CBG)	0.143	0.446	2.939	0.89	
Cannabigerolic Acid (CBGA)	0.597	1.866	ND	ND	
Cannabinol (CBN)	0.186	0.582	0.970	0.29	
Cannabinolic Acid (CBNA)	0.407	1.273	ND	ND	
Delta 8-Tetrahydrocannabinol (Delta 8-THC)	0.712	2.224	ND	ND	
Delta 9-Tetrahydrocannabinol (Delta 9-THC)	0.646	2.019	6.449	1.95	
Delta 9-Tetrahydrocannabinolic Acid (THCA-A)	0.573	1.789	ND	ND	
Tetrahydrocannabivarin (THCV)	0.130	0.406	ND	ND	
Tetrahydrocannabivarinic Acid (THCVA)	0.505	1.578	ND	ND	
Total Cannabinoids			47.415	14.37	
Total Potential THC			6.449	1.95	
Total Potential CBD			31.432	9.52	

Final Approval


 Sam Smith
 04May2022
 03:44:00 PM MDT
 PREPARED BY / DATE


 Jacob Miller
 04May2022
 03:53:00 PM MDT
 APPROVED BY / DATE



<https://results.botanacor.com/api/v1/coas/uuid/366a30f3-f615-49c5-b585-683f7170359e>

Definitions
 % = % (w/w) = Percent (weight of analyte / weight of product). ND = None Detected (defined by dynamic range of the method).
 Total Potential Delta 9-THC or CBD is calculated to take into account the loss of a carboxyl group during decarboxylation step, using the following formulas: Total Potential Delta 9-THC = Delta 9-THC + (Delta 9-THCa *(0.877)) and Total CBD = CBD + (CBDA *(0.877)).

Testing results are based solely upon the sample submitted to Botanacor Laboratories, LLC, in the condition it was received. Botanacor Laboratories, LLC warrants that all analytical work is conducted professionally in accordance with all applicable standard laboratory practices using validated methods. Data was generated using an unbroken chain of comparison to NIST traceable Reference Standards and Certified Reference Materials. This report may not be reproduced, except in full, without the written approval of Botanacor Laboratories, LLC. ISO/IEC 17025:2017 Accredited by A2LA.



Cert #4329.02

CDPHE Certified
 366a30f3f61549c5b585683f7170359e.1

5:1 25mg Orange Mother Liquor

Batch ID or Lot Number:	Test, Test ID and Methods: Various	Matrix: Concentrate	Page 1 of 5
Reported: 27Apr2022	Started: 27Apr2022	Received: 27Apr2022	


**Cannabinoids - Colorado
Compliance**

Test ID: T000204116

Methods: TM14 (HPLC-DAD): Potency – Standard

Cannabinoid Analysis

	LOD (%)	LOQ (%)	Result (%)	Result (mg/g)	Notes
Cannabichromene (CBC)	0.007	0.022	0.134	1.34	
Cannabichromenic Acid (CBCA)	0.007	0.020	ND	ND	
Cannabidiol (CBD)	0.017	0.059	0.816	8.16	
Cannabidiolic Acid (CBDA)	0.018	0.061	ND	ND	
Cannabidivarin (CBDV)	0.004	0.014	0.014	0.14	
Cannabidivarinic Acid (CBDVA)	0.007	0.025	ND	ND	
Cannabigerol (CBG)	0.004	0.013	0.076	0.76	
Cannabigerolic Acid (CBGA)	0.018	0.052	ND	ND	
Cannabinol (CBN)	0.006	0.016	0.024	0.24	
Cannabinolic Acid (CBNA)	0.012	0.036	ND	ND	
Delta 8-Tetrahydrocannabinol (Delta 8-THC)	0.021	0.062	ND	ND	
Delta 9-Tetrahydrocannabinol (Delta 9-THC)	0.019	0.057	0.166	1.66	
Delta 9-Tetrahydrocannabinolic Acid (THCA-A)	0.017	0.050	ND	ND	
Tetrahydrocannabivarin (THCV)	0.004	0.011	ND	ND	
Tetrahydrocannabivarinic Acid (THCVA)	0.015	0.044	ND	ND	
Total Cannabinoids			1.230	12.30	
Total Potential THC			0.166	1.66	
Total Potential CBD			0.816	8.16	

Final Approval

Daniel Weidensaul
27Apr2022
01:34:00 PM MDT

PREPARED BY / DATE



Jacob Miller
27Apr2022
01:36:00 PM MDT

APPROVED BY / DATE

5:1 25mg Orange Mother Liquor

Batch ID or Lot Number:	Test, Test ID and Methods: Various	Matrix: Concentrate	Page 2 of 5
Reported: 27Apr2022	Started: 27Apr2022	Received: 27Apr2022	

**Residual Solvents -
Colorado Compliance**

Test ID: T000204120

Methods: TM04 (GC-MS): Residual

Solvents	Dynamic Range (ppm)	Result (ppm)	Notes
Propane	98 - 1962	ND	
Butanes (Isobutane, n-Butane)	198 - 3955	ND	
Methanol	72 - 1439	ND	
Pentane	105 - 2096	ND	
Ethanol	112 - 2243	>2243	
Acetone	113 - 2250	ND	
Isopropyl Alcohol	121 - 2415	ND	
Hexane	7 - 143	ND	
Ethyl Acetate	117 - 2336	ND	
Benzene	0.2 - 4.8	ND	
Heptanes	114 - 2274	ND	
Toluene	21 - 419	ND	
Xylenes (m,p,o-Xylenes)	152 - 3033	ND	

Final Approval

Jacob Miller
29Apr2022
11:18:00 AM MDT
PREPARED BY / DATE



Ryan Weems
29Apr2022
11:20:00 AM MDT
APPROVED BY / DATE

5:1 25mg Orange Mother Liquor

Batch ID or Lot Number:	Test, Test ID and Methods: Various	Matrix: Concentrate	Page 3 of 5
Reported: 27Apr2022	Started: 27Apr2022	Received: 27Apr2022	

Microbial Contaminants - Colorado Compliance

Test ID: T000204118
 Methods: TM25 (qPCR) TM24, TM26, TM27 (Culture Plating): Microbial (Colorado Panel)

	Method	LOD	Quantitation Range	Result	Notes
STEC	TM25: PCR	10 ⁰ CFU/25g	NA	Absent	Free from visual mold, mildew, and foreign matter
Salmonella	TM25: PCR	10 ⁰ CFU/25g	NA	Absent	
Total Yeast and Mold*	TM24: Culture Plating	10 ¹ CFU/g	1.0x10 ² - 1.5x10 ⁴	None Detected	
Total Aerobic Count*	TM26: Culture Plating	10 ² CFU/g	1.0x10 ³ - 1.5x10 ⁵	None Detected	
Total Coliforms*	TM27: Culture Plating	10 ¹ CFU/g	1.0x10 ² - 1.5x10 ⁴	None Detected	

Final Approval

 Eden Thompson-Wright 30Apr2022 01:41:00 PM MDT	 Brett Hudson 02May2022 09:51:00 AM MDT
PREPARED BY / DATE	APPROVED BY / DATE

Heavy Metals - Colorado Compliance

Test ID: T000204119
 Methods: TM19 (ICP-MS): Heavy Metals

Metals	Dynamic Range (ppm)	Result (ppm)	Notes
Arsenic	0.04 - 4.20	ND	
Cadmium	0.04 - 4.27	ND	
Mercury	0.04 - 4.28	ND	
Lead	0.04 - 4.19	ND	

Final Approval

 Sam Smith 02May2022 07:54:00 AM MDT	 Alex Smith 02May2022 11:55:00 AM MDT
PREPARED BY / DATE	APPROVED BY / DATE

5:1 25mg Orange Mother Liquor

Batch ID or Lot Number:	Test, Test ID and Methods: Various	Matrix: Concentrate	Page 4 of 5
Reported: 27Apr2022	Started: 27Apr2022	Received: 27Apr2022	


Pesticides

Test ID: T000204117

Methods: TM17

(LC-QQ LC MS/MS)	Dynamic Range (ppb)	Result (ppb)		Dynamic Range (ppb)	Result (ppb)	
Abamectin	286 - 2722	ND		Malathion	306 - 2674	ND
Acephate	41 - 2729	ND		Metalaxyl	42 - 2696	ND
Acetamiprid	42 - 2729	ND		Methiocarb	42 - 2689	ND
Azoxystrobin	42 - 2640	ND		Methomyl	39 - 2710	ND
Bifenazate	43 - 2645	ND		MGK 264 1	181 - 1627	ND
Boscalid	39 - 2763	ND		MGK 264 2	126 - 1144	ND
Carbaryl	38 - 2724	ND		Myclobutanil	47 - 2742	ND
Carbofuran	41 - 2722	ND		Naled	47 - 2761	ND
Chlorantraniliprole	49 - 2731	ND		Oxamyl	41 - 2719	ND
Chlorpyrifos	46 - 2795	ND		Paclobutrazol	42 - 2714	ND
Clofentezine	282 - 2718	ND		Permethrin	313 - 2784	ND
Diazinon	307 - 2708	ND		Phosmet	42 - 2697	ND
Dichlorvos	272 - 2708	ND		Prophos	269 - 2697	ND
Dimethoate	41 - 2694	ND		Propoxur	42 - 2728	ND
E-Fenpyroximate	302 - 2741	ND		Pyridaben	298 - 2758	ND
Etofenprox	41 - 2775	ND		Spinosad A	36 - 2243	ND
Etoazole	300 - 2746	ND		Spinosad D	49 - 503	ND
Fenoxycarb	28 - 2686	ND		Spiromesifen	261 - 2759	ND
Fipronil	63 - 2662	ND		Spirotetramat	303 - 2636	ND
Flonicamid	48 - 2711	ND		Spiroxamine 1	18 - 1160	ND
Fludioxonil	280 - 2710	ND		Spiroxamine 2	25 - 1529	ND
Hexythiazox	43 - 2775	ND		Tebuconazole	319 - 2661	ND
Imazalil	284 - 2704	ND		Thiacloprid	43 - 2682	ND
Imidacloprid	42 - 2724	ND		Thiamethoxam	42 - 2718	ND
Kresoxim-methyl	48 - 2679	ND		Trifloxystrobin	42 - 2738	ND

Final Approval


 Sam Smith
 02May2022
 07:53:00 AM MDT
 PREPARED BY / DATE


 Alex Smith
 02May2022
 12:03:00 PM MDT
 APPROVED BY / DATE

5:1 25mg Orange Mother Liquor

Batch ID or Lot Number:	Test, Test ID and Methods: Various	Matrix: Concentrate	Page 5 of 5
Reported: 27Apr2022	Started: 27Apr2022	Received: 27Apr2022	



<https://results.botanacor.com/api/v1/coas/uuid/e16a785f-cd88-4e7a-bfe3-78a551938ff0>

Definitions

LOD = Limit of Detection, ULOQ = Upper Limit of Quantitation, LLOQ = Lower Limit of Quantitation, PPB = Parts per Billion, % = % (w/w) = Percent (weight of analyte / weight of product). ND = None Detected (defined by dynamic range of the method). Total Potential Delta 9-THC or CBD is calculated to take into account the loss of a carboxyl group during decarboxylation step, using the following formulas: Total Potential Delta 9-THC = Delta 9-THC + (Delta 9-THCa \times (0.877)) and Total CBD = CBD + (CBDa \times (0.877)). Fail equates to a concentration level of Delta 9-THC, on a dry weight basis, higher than 0.3 percent + or - the measurement uncertainty. Total Potential THC is calculated using the following formulas to take into account the loss of a carboxyl group during decarboxylation step. Total THC = THC + (THCa \times (0.877)). ALOQ = Above Limit Of Quantitation (defined by dynamic range of the method), CFU/g = Colony Forming Units per Gram. Values recorded in scientific notation, a common microbial practice of expressing numbers that are too large to be conveniently written in decimal form. Examples: 10^2 = 100 CFU, 10^3 = 1,000 CFU, 10^4 = 10,000 CFU, 10^5 = 100,000 CFU.

Testing results are based solely upon the sample submitted to Botanacor Laboratories, LLC, in the condition it was received. Botanacor Laboratories, LLC warrants that all analytical work is conducted professionally in accordance with all applicable standard laboratory practices using validated methods. Data was generated using an unbroken chain of comparison to NIST traceable Reference Standards and Certified Reference Materials. This report may not be reproduced, except in full, without the written approval of Botanacor Laboratories, LLC. ISO/IEC 17025:2017 Accredited by A2LA. Some tests listed on this COA may not be within our scope of A2LA accreditation. Please visit [A2LA for more details](#).



Cert #4329.02
e16a785fcd884e7abfe378a551938ff0.1

SB0516 Testimony.pdf

Uploaded by: Ian Swain

Position: UNF

The inevitable consequence of Bill SB 516 Cannabis Reform on Life, Liberty and the Pursuit of Health and Happiness. - Copia

Good day US Rep KWEISI MFUME and accompanying representatives and delegates.

After 27 years of my brothers and sisters in Baltimore being criminalized and persecuted for wanting pain and anxiety relief in a cold, harsh city, I, Ian Alexander Swain of Sound Mind, did not expect to be writing in protest about a progressive cannabis reform. I definitely didn't expect to be forced back into the status of an illegal medical cannabis user. As a individual dealing with a frustrating form of epilepsy that has at times left me without voluntary motor function, the ability to fully express my bladder, involuntary essential tremors, palsy, and left me lame in my legs for more than a year. Cannabis is a significant part of my wellness plan and the medical cannabis pay for wellness scheme was already a disgusting hurdle for patients in my honest opinion. As a resident of Baltimore and life long native, you, my representatives, have failed me. You have failed my fellow residents and you have failed yourselves, defeating the chance of ever being able to say, "I did right by my constituents, I helped Baltimore inch towards a more peaceful, healthy space."

"I can be proud of myself. "

Signed,

Ian Alexander Swain

21214 Resident

CBD, CBG, CBN, CBC, and a number of other crucial cannabinoids and NECESSARY for my health and wellness that would be made illegal for me to have simple, adult restricted access too.

Attached are lab reports for products that are crucial to my right to the pursuit of happiness and within that the right to pursue my best wellness plan.

I expect a tax in some way, I expect strict regulations, I didn't expect a health risk being reintroduced.

 MCT-for-Posting-OFTKL2250-221... 706 kB

 MCT-GUMBB5-Various-Lots-Exp-... 814 kB

8 - X - SB 671 - FIN - MMCC - LOI.docx.pdf

Uploaded by: State of Maryland (MD)

Position: INFO



March 9, 2023

The Honorable Melony Griffith
Chair, Senate Finance Committee
3 East, Miller Senate Office Building
Annapolis, Maryland 21401

**RE: Senate Bill 671– Medical Cannabis – Visiting Qualifying Patients –
Letter of Information**

Dear Chair Griffith:

The Maryland Medical Cannabis Commission (the Commission) is submitting this letter of information for Senate Bill 671 – Medical Cannabis – Visiting Qualifying Patients.

Currently, in order to qualify as a medical cannabis patient a person must live in Maryland or be in the State receiving in-patient treatment. A qualifying patient that has received a written certification from a certifying provider in the State may obtain up to a 30-day supply of medical cannabis products, which is defined as:

- (a) 120 grams of usable cannabis unless the provider determines this amount would be inadequate to meet the medical needs of the qualifying patient; or
- (b) In the case of a medical cannabis-infused product, 36 grams of delta-9-Tetrahydrocannabinol unless the provider determines this amount would be inadequate to meet the medical needs of the qualifying patient.

The Commission can monitor the 30-day supply received by a patient based on their patient identification card, registration with the Commission, and the State’s seed-to-sale tracking system.

As introduced, the Commission is prohibited from requiring a visiting out of state patient to register with the Commission. This would make it impossible for the Commission to monitor or limit a visiting out of state patient to the established 30-day supply for Marylanders. Further, given the medical program’s tax-free status, out-of-state patients would likewise receive an advantage compared to Maryland adult-use consumers.

Lastly, the Commission would highlight that as introduced, SB 671 references to the Medical Cannabis Program in Title 13, Subtitle 33 of the Health - General Article. SB 516, which is emergency legislation, contemplates large-scale cannabis reform, including repealing Title 13, Subtitle 33 and

recodifying many of its provisions in a new Alcoholic Beverages and Cannabis Article. The Commission believes that if both bills ultimately pass the General Assembly, a corrective bill would be necessary to move this provision into the new Alcoholic Beverages and Cannabis Article.

I hope you and the committee find this information useful. If you would like to discuss this further please contact Andrew Garrison, MPA, Deputy Director, Office of Policy and Government Affairs at andrew.garrison@maryland.gov or (443) 844-6114.

Sincerely,

A handwritten signature in blue ink that reads "Will Tilburg". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Will Tilburg, JD, MPH
Executive Director
Maryland Medical Cannabis Commission

This position does not necessarily reflect the position of the Maryland Department of Health or the Office of the Governor.