# Chain of Custody Packet Delta 8

## Joseph Reiben, Esq. 1122 Olympia Avenue, Unit B Longmont, CO 80504

March 23, 2021

#### To Whom It May Concern:

The undersigned is counsel to Alpha Omega Collectis, a limited liability in Aurora ("AOC"), its partners, affiliates, or other companies or individuals working in conjunction with AOC.

It is understood that, for the purposes described herein, SE has or will be engaging in production and/or sale of hemp products containing, in part, Delta 8 THC ("D8"), a cannabinoid derivative of both cannabidiol ("CBD") and Delta 9 THC ("D9").

#### **Definition**

D8 is defined by the National Cancer Institute as "[A]n analogue of tetrahydrocannabinol (THC) with antiemetic, anxiolytic, appetite-stimulating, analgesic, and neuroprotective properties. . . [that] exhibits a lower psychotropic potency than delta-9-tetrahydrocannabinol (delta-9-THC), the primary form of THC found in cannabis. (https://ncit.nci.nih.gov/ncitbrowser/ConceptReport.jsp?dictionary=NCl%20Thesaurus&code=C61312). In layman's terms, it is a cannabinoid that appears naturally in hemp plants in trace amounts, is more stable chemically than D9, and gives the user less of a psychotropic effect than D9, or what we commonly refer to as THC.

#### **Controlling Legislation**

#### **CSA**

Under section 102(16) of the Controlled Substances Act ("CSA"), Marihuana is classified as a Schedule 1 controlled substance. Marihuana is defined as:

(16)(A) Subject to subparagraph (B), the term "marihuana" means all parts of the plant Cannabis sativa L., whether growing or not; the seeds thereof; the resin extracted from any part of such plant; and every compound, manufacture, salt, derivative, mixture, or preparation of such plant, its seeds or resin.

(B) The term "marihuana" does not include—

- (i) hemp, as defined in section 16390 of title 7; or
- (ii) the mature stalks of such plant, fiber produced from such stalks, oil or cake made from the seeds of such plant, any other compound, manufacture, salt, derivative, mixture, or preparation of such mature stalks (except the resin extracted therefrom), fiber, oil, or cake, or the sterilized seed of such plant which is incapable of germination.

Further, Section 202(c) of the CSA, which defines THC as a Schedule 1 substance, allows for tetrahydrocannabinols found in hemp and hemp derivatives to be specifically excluded from the purview of the CSA, and instead defers to the Farm Bill, as discussed herein.

#### **Agriculture Improvement Act of 2018**

Under the Agriculture Improvement Act of 2018 (the "Farm Bill"), The term "Hemp" as used was defined as "[t]he plant Cannabis sativa L. and any part of that plant, including the seeds thereof and all derivatives, extracts, cannabinoids, isomers, acids, salts, and salts of isomers, whether growing or not, with a delta-9-tetrahydrocannabinol ("**THC**") concentration of not more than 0.3 percent on a dry weight basis." This definition includes products such as isolates and distillates created from the hemp plant, which contain a variety of isomers, including D8.

This distinction is important for a number of reasons, but for the purposes of this letter, it serves to:

- 1. Remove hemp and its derivatives, including D8, from the Controlled Substances Act and reclassify them as legal under the Farm Bill; and
- 2. Specifically defines THC as a schedule 1 substance, intentionally excluding hemp and other cannabinoids from that definition.

#### **Analysis and Conclusion**

From these two pieces of legislation, it is clear that D9, or THC, has not been removed from the CSA as a Schedule 1 substance, nor has its definition been altered in any way.

The removal of hemp from the CSA and its de-scheduling of it as a Schedule 1 substance reclassifying it under the Farm Bill, however, has the effect of de-scheduling cannabinoids found in hemp as well, subject to the restrictions set forth therein. While the Farm Bill does not mention D8 explicitly, it must be inferred that, as a hemp derivative, any product containing D8 must be legal for use so long as it contains less than 0.3% D9 on a dry weight basis. From this we can infer that any product AOC produces or sells that contains less than 0.3% D9 meets this legal standard and should be considered a legal or viable product

under the Farm Bill, since Congress amended the CSA to only address D9 THC as a controlled substance.

Lastly, should one take the position that D8 and D9 are legally equivalent under the Farm Bill, one only needs to look at the amended definition of tetrahydrocannabinols in the 2018 Farm Bill, where hemp and its derivatives, including D8, are excluded from that definition. This exclusion provides AOC with an extra layer of security from those who would interpret D8 as being an illegal substance under the Farm Bill.

In conclusion, it is my legal opinion and the stance of our firm that any and all products containing hemp and its derivatives, including D8, must be construed as legal for use so long as they adhere to the 0.3% D9 by dry weight standard set forth in the Farm Bill.

Should you have any questions or need further information, please do not hesitate to contact us via phone or email.

Very Truly Yours,

Joseph R. Reiben

#### The Farm

DELIA JIMENEZ CIOC
ASSISTANT AGRICULTURAL COMMESSIONER I SEALE
DANIEL DELGADO
GENUT AGRICULTURAL COMMESSIONER / SEALER
ERIK DOWNS
GENUT AGRICULTURAL COMMESSIONER / SEALER
MISAGEL MARTINEZ
GENUT AGRICULTURAL COMMESSIONER / SEALER
GENUT AGRICULTURAL COMMESSIONER / SEALER



RUBEN J. ARROYO

AGRICULTURAL COMMISSIONER
SEALER OF WEIGHTS AND MEASURES

7/27/2020

Subject: Amendment for approved cultivars

Enclosed is the proof of registration for industrial hemp cultivation as a Grower.

The following cultivation sites and approved seed cultivars are registered:

Keep this letter along with the proof of registration to document the registered cultivation sites.

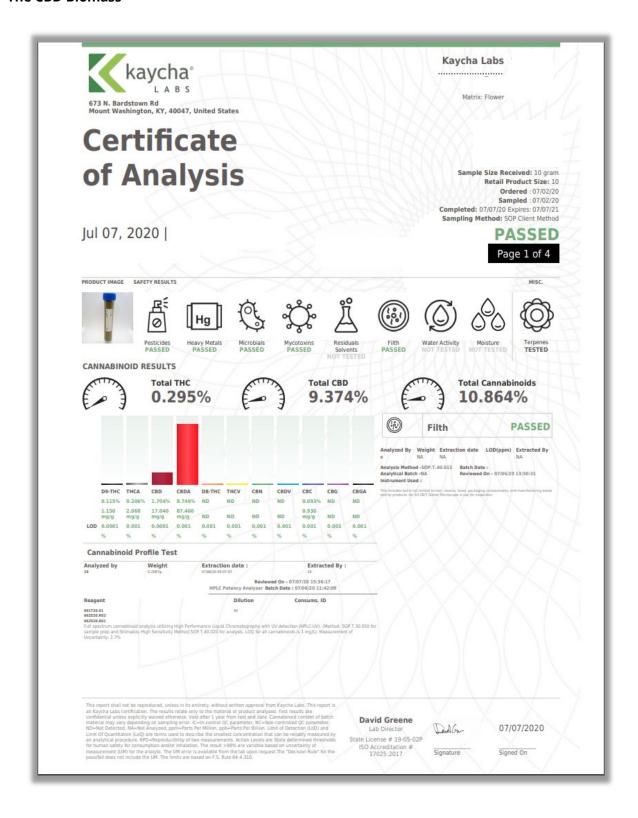
In accordance to Sections 81003(c)-(d) and 81004(c)-(d) of the California Food and Agricultural Code, registrants must submit a request, prior to planting, for any changes to the cultivation site(s) and/or approved seed cultivar(s) to us. We will notify you when the changes to the application have been approved.

In accordance with Section 81006 of the California Food and Agricultural Code, registrants are required to obtain a laboratory test report indicating the THC content prior to harvest. Sampling must occur no more than 30 days before harvest. Please contact us 30 days before you intend to harvest for further guidance.

If you have any questions, please contact us at 951-955-3045

3403 IO<sup>a</sup> Street, Suite 70I - Riverside, CA 9250I - Phone (95I) 955-3045 - Fax (95I) 955-3047

#### The CBD Biomass





673 N. Bardstown Rd Mount Washington, KY, 40047, United States Kaycha Labs

Matrix : Flower

## **Certificate of Analysis**

PASSED

Sample Size Received : 10 gram Completed : 07/07/20 Expires: 07/07/21 Sample Method : SOP Client Method Page 2 of 4



#### **Terpenes**

### **TESTED**

Terpenes	LOD	Units		Result (%)	Terpenes	LOD	Units		Result (%)
LPHA-CEDRENE	0.005	%	ND		SABINENE HYDRATE	0.01	%	ND	
LPHA-HUMULENE	0.005	%	0.021		TERPINEOL	0.005	%	ND	
LPHA-PINENE	0.005	%	0.027		TERPINOLENE	0.005	96	ND	
LPHA-TERPINENE	0.005	%	ND		TRANS-	0.005	%	0.070	
ETA-MYRCENE	0.005	%	0.022		CARYOPHYLLENE				
ETA-PINENE	0.005	%	0.009		TRANS-NEROLIDOL	0.005	%	ND	
ORNEOL	0.01	%	ND		VALENCENE	0.005	%	ND	
AMPHENE	0.005	%	ND						
AMPHOR	0.01	%	ND		17 /				
ARYOPHYLLENE XIDE	0.005	%	0.014		S Te	rpene	S		TESTED
EDROL	0.005	96	ND		(O)	Pene	7 / /		IESTED
LPHA-BISABOLOL	0.005	%	0.033		9				
OPULEGOL	0.01	%	ND		17. 77.15				
IS-NEROLIDOL	0.005	%	ND		14.		4		A
CARENE	0.005	96	ND		Analyzed by	Weight		ion date	Extracted By
ENCHYL ALCOHOL	0.005	%	ND		18	0.961g	07/06/20 01	:07:17	18
EXAHYDROTHYMOL	0.005	%	ND						
JCALYPTOL	0.005	%	ND		i			Reviewed On	- 07/07/20 12:28:5
OBORNEOL	0.005	%	ND		Instrument Used	: GCMS80	50 with Lie	guid Handler	
ENCHONE	0.01	96	ND		Batch Date: 07/0	6/20 13:2	2:10	. // /	
AMMA-TERPINENE	0.005	%	ND			***************************************	T-1-1	- Y - Y	A 12
ERANIOL	0.005	%	ND		Reagent	Diluti	ion	Consum	s. ID
ERANYL ACETATE	0.01	%	ND						
UAIOL	0.005	%	ND		Tornanaid profile su	racaine ir	narformed	cine GC MS/I	45 TQ-8040 with Liqui
MONENE	0.005	96	ND						iple Quad) which can
INALOOL	0.01	%	ND		screen 37 terpenes				
EROL	0.005	%	ND		MS/MS.			7	
CIMENE	0.005	%	ND						
LPHA-PHELLANDRENE	0.005	%	ND			3/	30.77		V.
ULEGONE	0.005	%	ND		1/				
ABINENE	0.005	%	ND		I X				
otal		0.196							

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**David Greene** 

State License # 19-05-02P ISO Accreditation # 17025:2017 Della

07/07/2020

Signature

Signed On



673 N. Bardstown Rd Mount Washington, KY, 40047, United States Kaycha Labs

Matrix : Flower

## **Certificate of Analysis**

**PASSED** 

Sample Size Received: 10 gram Completed: 07/07/20 Expires: 07/07/21 Sample Method: SOP Client Method Page 3 of 4

	Pestic	ides							PAS	SED
esticides	LOD	Units	Action Level	Result	Pesticides	L	OD	Units	Action Le	vel Result
BAMECTIN B1A	0.020	ppm	0.5	ND	PRALLETHRIN	0.	.050	ppm	0.2	ND
CEPHATE	0.010	ppm	0.5	ND	PROPICONAZOLE	0.	.010	ppm	0.4	ND
CEQUINOCYL	0.02	ppm	2	ND	PROPOXUR	0.	.010	ppm	0.2	ND
CETAMIPRID	0.010	ppm	0.2	ND	PYRETHRIN I	0.	010	ppm	1	ND
LDICARB	0.020	ppm	0.4	ND	PYRIDABEN	0.	.005	ppm	0.2	ND
ZOXYSTROBIN	0.010	ppm	0.2	ND	SPINETORAM	0.	.005	ppm	0.5	ND.
IFENAZATE	0.010	ppm	0.2	ND	SPINOSAD (SPINOSYI	(A)	.010	ppm	0.2	ND
FENTHRIN	0.010	ppm	0.2	ND	SPINOSAD (SPINOSYI	ND) 0.	.010	ppm	0.2	ND
DSCALID	0.005	ppm	0.4	ND	SPIROMESIFEN	0.	010	ppm	0.2	ND
ARBARYL	0.010	ppm	0.2	ND	SPIROTETRAMAT	0.	.020	ppm	0.2	ND
ARBOFURAN	0.010	ppm	0.2	ND	SPIROXAMINE	0.	.010	ppm	0.4	ND
HLORANTRANILIPROLE	E 0.010	ppm	0.2	ND	TEBUCONAZOLE	0.	.010	ppm	0.4	ND
HLORPYRIFOS	0.010	ppm	0.2	ND	THIACLOPRID	0.	010	ppm	0.2	ND
LOFENTEZINE	0.010	ppm	0.2	ND	THIAMETHOXAM	0.	.010	ppm	0.5	ND
OUMAPHOS	0.005	ppm	0.2	ND	TRIFLOXYSTROBIN	0.	010	ppm	0.2	ND
YPERMETHRIN	0.010	ppm	1	ND	mi	I and in		1 // //	* * *	24000
AMINOZIDE	0.010	ppm	1	ND	R .	Pestic	cides			PASSE
AZANON	0.010	ppm	0.2	ND	(C)	4		A X		
CHLORVOS	0.050	ppm	0.1	ND	Analyzed by	Weight		Extraction date		Extracted By
METHOATE	0.010	ppm	0.2	ND	9	1.00199		07/06/20 02:07:01		9
METHOMORPH	0.005	ppm	0.1	ND				Paris .	ewed On- 07/06/20 13	
HOPROPHOS	0.010	ppm	0.2	ND	Instrument Used : LCM:	SMS 8060 P	N 1	Nevi	ewed On- 07/05/20 13	120131
	0.010			ND	Batch Date : 07/06/20 1	3:44:14		/		
OFENPROX	0.010	ppm	0.4	ND ND	Reagent	3:44:14	+	Dilution	Consums. ID	
FOFENPROX FOXAZOLE	0.010	ppm ppm	0.4	ND		3:44:14	V	Dilution	Consums. ID	XX
OFENPROX TOXAZOLE ENHEXAMID	0.010 0.005	ppm ppm	0.4 0.2 0.1	ND ND	Reagent	3:44:14	X	Dilution	Consums. ID	XX
TOFENPROX TOXAZOLE ENHEXAMID ENOXYCARB	0.010 0.005 0.010	ppm ppm ppm ppm	0.4 0.2 0.1 0.2	ND ND ND	Reagent	1	X			
TOFENPROX TOXAZOLE ENHEXAMID ENOXYCARB ENPYROXIMATE	0.010 0.005 0.010 0.010	ppm ppm ppm ppm ppm	0.4 0.2 0.1 0.2 0.4	ND ND ND	Reagent source s	ormed using		which can screen do	wn to below single di	
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TOFENPROX TOXAZOLE ENHEXAMID ENOXYCARB ENPYROXIMATE PRONIL LONICAMID	0.010 0.005 0.010 0.010 0.020 0.020	ppm ppm ppm ppm ppm ppm	0.4 0.2 0.1 0.2 0.4 0.4	ND ND ND ND ND	Reagent	armed using	we analy	which can screen do yze for 57 Pesticides.	wn to below single di (Method: SOP.T.30.0	60 Sample Preparation
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**David Greene** 

Lab Director State License # 19-05-02P ISO Accreditation # 17025:2017 DelGa

07/07/2020

Signature

Signed On



673 N. Bardstown Rd Mount Washington, KY, 40047, United States

#### Kaycha Labs

Matrix : Flower

## **Certificate of Analysis**

PASSED

Sampled: 07/02/20 Ordered: 07/02/20

Sample Size Received: 10 gram Completed: 07/07/20 Expires: 07/07/21 Sample Method: SOP Client Method

Page 4 of 4

Action Level (PPM)

**Extracted By** 

Mycotoxins **PASSED** Action Level (PPM)

AFLATOXIN G2 ppm ppm ppm ppm 0.001 0.02 AFLATOXIN G1 0.001 ND AFLATOXIN B2 0.001

Instrument Used: Batch Date: 07/06/20 13:44:53

Weight Extraction date Extracted By

Aflataxins B1, B2, G1, G2, and Ochrataxins A testing using LC-M5. (Method: SOP.T.30.060 for Sample Preparation and SOP.T40.060 Procedure for Mycotoxins Quantification Using LCM5. LOQ 1.0 ppb). Total Aflatoxins (Aflotoxin B1, B2, C3, G2) must be <20g/kg. CC+tractoxins must be <20g/kg.

Hg	Heavy Metals	PASSED

LOD

0.02

0.02

0.02

Weight

Microbials **PASSED** 

ARSENIC LEAD Result MERCURY Analyte not present in 1 gram. Analyzed by not present in 1 gram. 18 not present in 1 gram. Instrument Use

| Reviewed On - 07/07/20 15:02:29

Batch Date: 07/07/20 10:50:08

Metal

Instrument Used : PathogenDX Batch Date : 07/07/20 09:46:11 Analyzed by Weight Extraction date

Extracted By

Extraction date

ND

Reagent Consums. ID 060420.10

060420.14

**David Greene** Lab Director

State License # 19-05-02P ISO Accreditation #

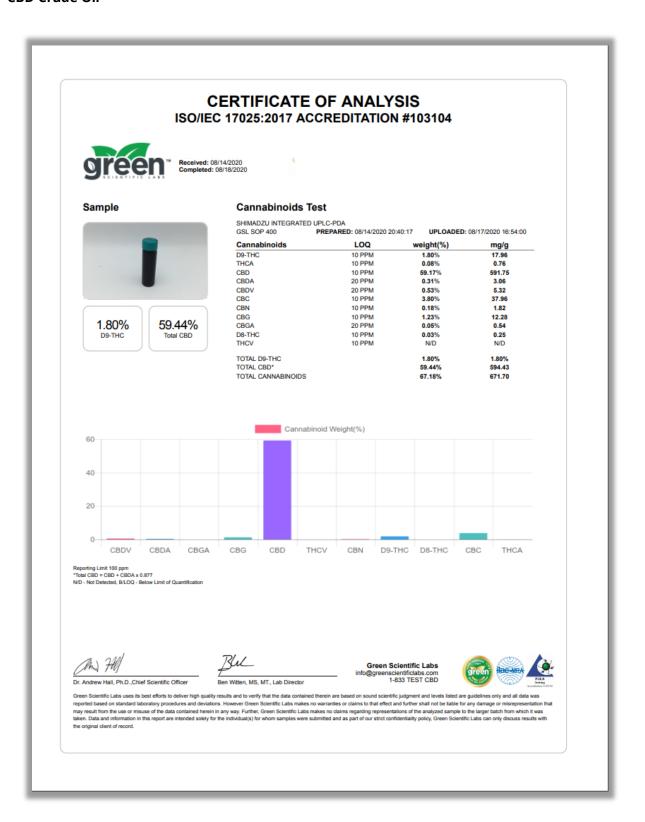
DelGa

07/07/2020

Signature

Signed On

#### **CBD Crude Oil**





Received: 08/14/2020 Completed: 08/18/2020

#### PESTICIDE ANALYSIS:

GSL SOP 401

PREPARED: 08/14/2020 20:53:26

UPLOADED: 08/17/2020 15:34:04

LCMS-MS - Shimadzu LCMS-8060

Pesticide	Action Level (ppm)	Results (ppm)	LOQ (ppm)	LOD (ppm)	Pesticide	Action Level (ppm)	Results (ppm)	LOQ (ppm)	LOD (ppm)
ABAMECTIN B1A	0.100	N/D	0.005	0.001	IMIDACLOPRID	5.000	N/D	0.005	0.001
ACEPHATE	0.100	N/D	0.001	0.001	KRESOXIM-METHYL	0.100	N/D	0.010	0.005
ACEQUINOCYL	0.100	N/D	0.001	0.001	MALATHION	0.500	N/D	0.005	0.001
ACETAMIPRID	0.100	N/D	0.005	0.001	METALAXYL	2.000	N/D	0.001	0.001
ALDICARB	0.100	N/D	0.005	0.001	METHIOCARB	0.100	N/D	0.005	0.001
AZOXYSTROBIN	0.100	0.051	0.001	0.001	METHOMYL	1.000	N/D	0.001	0.001
BIFENAZATE	0.100	N/D	0.005	0.001	MEVINPHOS	0.100	N/D	0.001	0.001
BIFENTHRIN	3.000	N/D	0.005	0.001	MYCLOBUTANIL	0.100	N/D	0.005	0.001
BOSCALID	0.100	N/D	0.005	0.001	NALED	0.100	N/D	0.005	0.001
CARBARYL	0.500	N/D	0.003	0.001	OXAMYL	0.500	N/D	0.001	0.001
CARBOFURAN	0.100	N/D	0.001	0.001	PACLOBUTRAZOL	0.100	N/D	0.005	0.001
CHLORANTRANILIPROLE	10.000	N/D	0.005	0.005	PERMETHRINS	0.500	N/D	0.005	0.001
CHLORPYRIFOS	0.100	N/D	0.001	0.001	PHOSMET	0.100	N/D	0.005	0.001
CLOFENTEZINE	0.100	N/D	0.001	0.001	PIPERONYL	3.000	0.175	0.001	0.001
DAMINOZIDE	0.100	N/D	0.005	0.001	BUTOXIDE	3.000	0.175	0.001	0.001
DIAZINON	0.100	N/D	0.001	0.001	PRALLETHRIN	0.100	N/D	0.005	0.005
DICHLORVOS	0.100	N/D	0.005	0.001	PROPICONAZOLE	0.100	N/D	0.010	0.005
DIMETHOATE	0.100	N/D	0.001	0.001	PROPOXUR	0.100	N/D	0.001	0.001
DIMETHOMORPH	2.000	N/D	0.005	0.001	PYRETHRINS	0.500	N/D	0.005	0.005
ETHOPROPHOS	0.100	N/D	0.001	0.001	(PYRETHRIN I)	0.500	N/D	0.005	0.005
ETOFENPROX	0.100	N/D	0.001	0.001	PYRIDABEN	0.100	N/D	0.005	0.001
ETOXAZOLE	0.100	N/D	0.010	0.005	SPINETORAM	0.100	N/D	0.001	0.001
FENHEXAMID	0.100	N/D	0.005	0.001	SPINOSAD	0.100	N/D	0.001	0.001
FENOXYCARB	0.100	N/D	0.005	0.001	SPIROMESIFEN	0.100	N/D	0.005	0.001
FENPYROXIMATE	0.100	N/D	0.001	0.001	SPIROTETRAMAT	0.100	N/D	0.001	0.001
FIPRONIL	0.100	N/D	0.003	0.001	SPIROXAMINE	0.100	N/D	0.001	0.001
FLONICAMID	0.100	N/D	0.025	0.010	TEBUCONAZOLE	0.100	N/D	0.005	0.001
FLUDIOXONIL	0.100	N/D	0.003	0.001	THIACLOPRID	0.100	N/D	0.001	0.001
HEXYTHIAZOX	0.100	N/D	0.005	0.001	THIAMETHOXAM	5.000	N/D	0.001	0.001
IMAZALIL	0.100	N/D	0.005	0.001	TRIFLOXYSTROBIN	0.100	N/D	0.001	0.001

N/D = Not Detected, A/LOQ = Above LOQ Level, B/LOQ = Below LOQ Level, B/LOD = Below LOD Level

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#### **RESIDUAL SOLVENTS:**

Headspace GCMS - Shimadzu GCMS QP2020 with HS20

GSL SOP 405 Prepared: 08/14/2020 21:21:09 Uploaded: 08/17/2020 14:52:42

Residual Solvent	Action Level (ppm)	Results (ppm)	LOQ (ppm)	LOD (ppm)
1,1-DICHLOROETHENE	8	N/D	0.63	0.63
1,2- DICHLOROETHANE	2	N/D	0.12	0.02
ACETONE	5,000	208	140	20
ACETONITRILE	410	N/D	25	1
BENZENE	1	N/D	1	0.5
BUTANE	5,000	N/D	50	10
CHLOROFORM	1	N/D	1	0.5
CIS 1,2-DICHLOROETHENE	5	N/D	0.73	0.18
ETHANOL	5,000	B/LOQ	140	20
ETHYL ACETATE	5,000	N/D	140	20
ETHYL ETHER	5,000	N/D	140	20
ETHYLENE OXIDE	1	N/D	0	0
SOPROPYL ALCOHOL	5,000	N/D	140	20
METHANOL	3,000	N/D	100	20
METHYLENE CHLORIDE	125	N/D	0.15	0.15
N-HEPTANE	5,000	N/D	140	20
N-HEXANE	290	N/D	18	10
PENTANE	5,000	N/D	140	20
PROPANE	5,000	N/D	20	1
TOLUENE	890	N/D	53	1
TRANS 1,2-DICHLOROETHENE	5	N/D	0.73	0.18
TRICHLOROETHENE	1	N/D	1	0.5
XYLENES	150	N/D	130	20

Dr. Andrew Hall, Ph.D., Chief Scientific Officer

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Received: 08/14/2020 Completed: 08/18/2020

Microbial Analysis:

Microbial Analysis GSL SOP 406

Uploaded: 08/18/2020 18:08:30

PCR - Agilent AriaMX

#### **MICROBIAL ANALYSIS:**

PCR - Agilent AriaMX

Test	SOP	Test Method	Device Used	LOD	Allowable Criteria	Actual Result	Pass/Fail
ASPERGILLUS FUMIGATUS***	406.01	USP 61/62†	ARIAMX PCR	1 CFU/G**	DETECT/NOT DETECTED	NOT DETECTED	PASS
ASPERGILLUS TERREUS***	406.01	USP 61/62†	ARIAMX PCR	1 CFU/G**	DETECT/NOT DETECTED	NOT DETECTED	PASS
ASPERGILLUS FLAVUS***	406.01	USP 61/62†	ARIAMX PCR	1 CFU/G**	DETECT/NOT DETECTED	NOT DETECTED	PASS
ASPERGILLUS NIGER***	406.01	USP 61/62†	ARIAMX PCR	1 CFU/G**	DETECT/NOT DETECTED	NOT DETECTED	PASS
STEC E. COLI*	406.01	USP 61/62†	ARIAMX PCR	1 CFU/G**	DETECT/NOT DETECTED	NOT DETECTED	PASS
SALMONELLA*	406.01	USP 61/62†	ARIAMX PCR	1 CFU/G**	DETECT/NOT DETECTED	NOT DETECTED	PASS

Ben Witten, MS, MT., Lab Director

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<sup>†</sup> USP 61 (enumeration of bacteria TAC, TYM, and ENT/Coliform), USP 62 (identifying specific species E.coli Aspergillus etc)
\*STEC and Salmonella run as Multiplex
\*\*CFUIg Calculation based on MIP/Extract matrix
\*\*\*Flavus = 2 Copies of DNA / Terrus = 10 copies of DNA Niger = 20 Copies of DNA / Terrus = 10 copies of DNA



#### Mycotoxin Analysis:

LC-MS - Shimadzu LCMS-8060 GSL SOP 401

Uploaded: 08/17/2020 15:34:02

Analyte	Action LvI (ppb)	Results (ppb)
AFLATOXIN B1	20	N/D
AFLATOXIN B2	20	N/D
AFLATOXIN G1	20	N/D
AFLATOXIN G2	20	N/D
OCHRATOXIN A	20	N/D

LOQ is 1ppb, LOD is 1ppb

#### **Heavy Metals Analysis:**

ICP-MS - Shimadzu ICPMS-2030 GSL SOP 403

Uploaded: 08/17/2020 17:54:06

Metal	Action Level (ppb)	Result (ppb)
ARSENIC (AS)	1,500	B/LOQ
CADMIUM (CD)	2,500	B/LOQ
MERCURY (HG)	1,500	B/LOQ
LEAD (PB)	5,000	115

Lower Limit of Quantitation (LOQ) is 75 ppb

Am) Fell

Dr. Andrew Hall, Ph.D., Chief Scientific Officer

Bul

Ben Witten, MS, MT., Lab Director

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## **Gobi Hemp**

#### Analytical Report - Certificate of Analysis

gob

Manifest: 2102110006

Sample Id: 1A-GHEMP-2102110006-0001

Sample Name: DD02102021 Sample Type: Concentrate Test Performed: Hemp Lab

 Receive Date:
 2021-02-11

 Test Date:
 2021-02-15

 Report Date:
 2021-02-16

 Sample Condition:
 Good

 Method Reference:
 GH-OP-06

#### Scope

The content of sixteen cannabinoids was determined by an in-house developed method for solvent extraction followed by High Performance Liquid Chromatography with Diode Array Detection.

Cannabinoids	Percent	mg/gram
CBDV	0.51	5.11
CBDA	ND	ND
CBGA	ND	ND
CBG	2.06	20.59
CBD	81.86	818.57
THCV	ND	ND
CBN	1.59	15.90
Δ9-THC	0.23	2.25
CBC	0.22	2.23
THCA	ND	ND
CBDVA	ND	ND
THCVA	ND	ND
CBNA	ND	ND
Δ8-THC	ND	ND
CBL	0.23	2.26
CBCA	ND	ND

CBCA	ND	IND.
ND - not detected; T	- trace; ULOQ - lin	nit of quantitation

	Percent	mg/gram
Total ∆9-THC	0.23	2.25
Total CBD	81.86	818.57
Total CBG	2.06	20.59
Total Cannabinoids	86.69	866.91

Total  $\Delta 9$ -THC =  $\Delta 9$ -THC + (THCA x 0.877) Total CBD = CBD + (CBDA x 0.877) Total CBG = CBG + (CBGA x 0.877)

#### **Laboratory Comments:**

Beiju relas

Benjamin Whaley Laboratory Analyst

2021-02-16

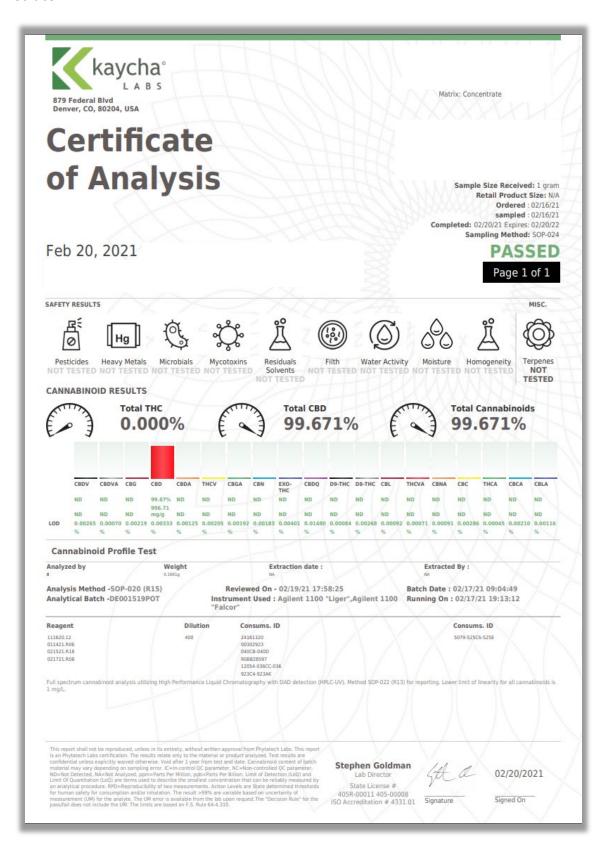
Date

This report has been prepared by Gobi Hemp Laboratory exclusively for our Client and their Authorized Representatives. All analytical work is conducted in accordance with a mutually agreed upon scope of work and the terms and conditions as expressed in the Gobi Hemp Laboratory Service Agreement. This report is not to be reproduced in whole or in part without prior written approval. The results shown on this report relate only to the samples submitted to the laboratory. Estimated Uncertainty available upon request.



Page 1 of 1

#### **CBD** Isolate



#### **Hemp Derived Isomer (Delta 8)**

#### TX210223-006 page 1 of 1

**QA** Testing

#### PharmLabs Dallas LLC Certificate of Analysis

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		Matrix Distillate	
Sampled -	Received Feb 23, 2021	Reported Feb 24, 2021	
Analyses system CA	N		

#### CAN - Cannabinoid Profile Analysis

Analyzed Feb 24, 2021 | Instrument HPLC-DAD | Method WI-32 Measurement Uncertainty at 95% confidence 10.0%

Analyte	LOD	LOQ	Result %	Result mg/g
Cannabidivarinic acid (CBDVa)	2.0e-06	5.0e-06	ND	ND
Cannabidivarin (CBDV)	3.0e-06	1.0e-05	ND	ND
Cannabidiolic acid (CBDa)	3.0e-06	8.0e-06	ND	ND
Cannabigerolic acid (CBGa)	3.0e-06	8.0e-06	ND	ND
Cannabigerol (CBG)	5.0e-06	1.6e-05	ND	ND
Cannabidiol (CBD)	6.0e-06	1.7e-05	ND	ND
Tetrahydrocannabivarin (THCV)	6.0e-06	1.7e-05	ND	ND
Tetrahydrocannabivarinic acid (THCVa)	5.0e-06	1.5e-05	ND	ND
Cannabinol (CBN)	3.0e-06	1.0e-05	ND	ND
Cannabinolic acid (CBNa)	8.0e-06	2.6e-05	ND	ND
Δ9-Tetrahydrocannabinol (Δ9-THC)	1.2e-05	3.6e-05	ND	ND
Δ8-Tetrahydrocannabinol (Δ8-THC)	1.5e-05	4.5e-05	97.13	971.33
Cannabicyclol (CBL)	1.3e-05	3.8e-05	ND	ND
Δ9-Tetrahydrocannabinolic acid (THCa)	9.0e-06	2.8e-05	ND	ND
Cannabichromene (CBC)	6.0e-06	1.9e-05	ND	ND
Cannabichromenic acid (CBCa)	2.2e-05	6.7e-05	ND	ND
Total THC (THCa * 0.877 + THC)			ND	ND
Total CBD (CBDa * 0.877 + CBD)			ND	ND

#### Sample photography



ND Not Detected N/A Not Applicable NT Not Reported LOO Limit of Detection LOQ Limit of Quantification <. LOQ Detected >U.OL Above upper limit of linearity CFU/g Colony Forming Units per 1 gram TNTC Too Numerous to Count



Dr. Archana R. Parameswar, Laboratory Director Wed, 24 Feb 2021 08:10:01 -0600

Authorized Signature

PharmLabs Dallas LLC | 2567 Valley View Ln, Dallas, TX 75234, United States | 214.903.4405 | ISO/IEC 17025:2017 Certification L20-89-5

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#### **D8 PROCESSING EXPLAINED**

Our process of delta 8 THC extraction follows exactly the pathway as the natural secondary metabolic conversion of CBD into delta 8 due to catalytic reaction and the oxidative redox path through the secondary processes following photosynthesis. The anions and cations, naturally secretive in the plant, act as catalysts and the naturally secretive salts and sodium bicarbonate act as a buffer to balance the reaction. There are no synthetic elements or constituents implied. The process also reserves the full chain of custody that all derived analysts trace back to their precursors found in the natural hemp plant.

#### THIRD PARTY TESTING LABS

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Email: Contact@AltitudeConsultingllc.com

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CMTL License

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