Notice(s) of Violation

Alcohol & Marijuana Control
550 W. 7th Ave, Suite 1600
Anchorage, AK 99501

Date: 10/26/16
Number AB16-0636

Notice of Violation

(3AAC 306.805)

Licensee	License Number	Type of License
Bryant Thorp	10037	Retail Marijuana Store
D.B.A.	**How Delivered**	**Law Enforcement Agency**
Arctic Herbery	Certified Mail	Anchorage Police Department
Street or P.O. Box	**City, State**	**Zip**
7107 Arctic Blvd	Anchorage, AK	99518

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will received an Accusation and Notice of your right to an Administrative Hearing.
Note: This is not an accusation or a criminal complaint.

VIOLATION: On Oct 21, 2016 KTUU published a story titled "Even without marijuana for sale, Anchorage's first retail pot shop opens its doors" in reference to Arctic Herbery. The story stated that the owner and licensee, Bryant Thorp, was giving away "free samples" of marijuana to customers. Thorp was quoted as saying "When you hand someone a joint or a nug, they kind of get excited about it."

Thorp has two active marijuana establishment licenses with AMCO; Standard marijuana cultivation facility as of 08/18/16 and retail marijuana store as of 10/20/16. AMCO Investigators have yet to conduct final inspections of either license.

Thorp confirmed that he did in fact introduce marijuana into the licensed premises for the purpose of providing free samples.

The marijuana provided by Thorp was never part of the regulated market as it was not tracked in the marijuana inventory tracking system (metrc), was not subject to required testing and was not packaged and labeled as required.

Your attention is directed to 3 AAC 306.310 Acts prohibited at retail marijuana store, 3 AAC 306.305 Retail marijuana store privileges, 3 AAC 306.330 Marijuana inventory tracking system, 3 AAC 306.340 Testing required for marijuana and marijuana products and 3 AAC 306.345 Packaging and labeling.

You are directed to respond to the Director of the Marijuana Control Board in writing to this Notice of Violation within 10 days of receipt to explain what action you have taken to prevent a reoccurrence of this violation. FAILURE TO RESPOND TO THIS NOTICE OF VIOLATION WITHIN 10 DAYS WILL RESULT IN YOUR APPREARANCE, EITHER IN PERSON OR TELEPHONICALLY, BEFORE THE MARIJUANA CONTROL BOARD AT THEIR NEXT REGULARLY SCHEDULED BOARD MEETING.

***Please include your Marijuana Establishment License Number in your response.**

Cynthia Franklin, Director
Alcohol & Marijuana Control Office
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501

A Response is Required

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the Director and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice and the Director must grant an appearance within ten days after receipt of a request. A Licensee shall respond, either orally or in writing, to the Notice.

Receipt:	Violation Observed By: J. Bankowski
Filed By:	Title: Investigator III

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Bryant Thorp
7107 Arctic Blvd
Anchorage, AK 99518

9590 9402 1211 5246 2917 16

2. Article Number *(Transfer from service label)*

7015 1520 0001 7802 2061

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by *(Printed Name)* Bryant Thorp

C. Date of Delivery 10/29/16

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

RECEIVED
OCT 3 1 2016
ALCOHOL MARIJUANA CONTROL OFFICE
STATE OF ALASKA

3. Service Type

☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

PS Form 3811, July 2015 PSN 7530-02-000-9053

From: Franklin, Cynthia A (CED)
To: Hoelscher, James C (CED); Oates, Sarah D (CED)
Cc: Dinegar, Harriet C (LAW)
Subject: FW: Arctic Herbery License #10037
Date: Wednesday, November 02, 2016 3:18:01 PM

Here is the response I received yesterday. I have done absolutely nothing with it yet.

Cynthia Franklin, Director
Alcohol & Marijuana Control Office
907-269-0351

From: Bryant Thorp [mailto:bryant@gci.net]
Sent: Tuesday, November 01, 2016 11:19 AM
To: Franklin, Cynthia A (CED)
Subject: Arctic Herbery License #10037

Cynthia,
I received your two notices of violation dated 10/26/2016 both numbered AB16-0636. It seems that there is a notice of violation regarding both of my license numbers, one for each my retail and cultivation facility. I agree that there is a level of merit to these violations, however; I disagree that the cultivation license #10035 should be listed in these violations as the violations in question were not in any way a part of the cultivation facility.
I'd like to address the violation pertaining to my retail license in the following way:

After receiving my Certificate of Occupancy from the Muni for my location I did some soft openings to get a feel for the store and invite the public to do the same. This was done without product of any kind. I had glass and papers for sale and I had a jar of a sample that had been left from a cultivator that I had been using as a prop. The media got wind of my openings and blew things way out of proportion. It was never my intent to provide free samples as the violation suggests. I closed the doors for the following week and shut down the rumor that I was giving away "free samples" immediately. All of the props were all removed from the store as well.

The media has been very good to me in most ways so I have continued to talk to them, in this case they pushed a story that was misleading at best and somewhat damaging to the industry and myself. For my part in this I have to apologize and insist that my interests are inline with those of the new and fledging industry and making it as non-controversial as possible. It is my intent to run this business in the most professional way possible and to be a light on the industry. It seems that I have failed that in ways but I am committed to staying the course. Please let me know if there is another way that you would like me to address these violations. If you continue to feel that the violations against my cultivation facility have merit, please accept this as my response to that notice as well.

Bryant Thorp
Arctic Herbery

Alcohol & Marijuana Control Office
550 W. 7th Ave, Suite 1600
Anchorage, AK 99501

Date: 2/10/17
Case Number:AB17-071

Notice of Violation

(3AAC 306.805)

Licensee	License Number	Type of License
Bryant Thorp	**10037**	**Retail**
D.B.A.	**How Delivered**	**Law Enforcement Agency**
Arctic Herbery	**Electronic**	**AMCO**
Street or P.O. Box	**City, State**	**Zip**
7107 Arctic Blvd	**Anchorage, AK**	**99518**

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative HearingNote:
On 2/9/17 It was observed by AMCO investigators that your location had marijuana oil (CBD Oil) manufactured from a source outside the State of Alaska for sale. This action is in violation of the following:
3AAC306.305-Retail Marijuana Store Privileges
3AAC306.310-Acts Prohibited at Retail Marijuana Store
3AAC306.330-Marijuana Inventory Tracking System
3AAC306.340-Testing Required for Marijuana and Marijuana Products
3AAC306.345-Packaging and Labelling
Reference:
AS17.38.010(b)(2),(3)
AS17.38.131-Enforcement Powers
AS17.38.900(10),(15)-Definitions
3AAC306.830-Seizure of Marijuana Product

This is not an accusation or a criminal complaint.
You are directed to respond to the Director of the Marijuana Control Board in writing to this Notice of Violation within 10 days of receipt to explain what action you have taken to prevent a reoccurrence of this violation. FAILURE TO RESPOND TO THIS NOTICE OF VIOLATION WITHIN 10 DAYS WILL RESULT IN YOUR APPEARANCE, EITHER IN PERSON OR TELEPHONICALLY, BEFORE THE MARIJUANA CONTROL BOARD AT THEIR NEXT REGULARLY SCHEDULED BOARD MEETING.

***Please include your Marijuana Establishment License Number in your response.**

Alcohol & Marijuana Control Office
ATTN: Enforcement Unit
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501

A Response is Required

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A Licensee shall respond, either orally or in writing, to the Notice.

Receipt:	Violation Observed By: Inv. J. Bankowski
Filed By: Inv. J. Rukes	Title: Investigator III

THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Commerce, Community, and Economic Development

ALCOHOL AND MARIJUANA CONTROL OFFICE

550 West 7th Ave, Suite 1600
Anchorage, AK 99501
Main: 907.269.0350
Fax: 907.272.9412

February 10, 2017

Arctic Herbery
7107 Arctic Blvd
Anchorage, AK 99518
Via Certified and Electronic Mail

NOTICE OF HEARING

Re: Alaska Retail Marijuana Store License #10037

You are hereby notified that, on February 9, 2017, the following marijuana product was seized from your licensed place of business in accordance with 3 AAC 306.830. Seizure of marijuana or marijuana product :

Description of Item	Estimated Weight/Volume/Amount
*Please see attached Written Inventory Receipt	

The marijuana product listed above was found to be in violation of regulations pertaining to licensure as a Marijuana Retail Establishment:

3 AAC 306.305. Retail marijuana store privileges

3 AAC 306.310. Acts prohibited at retail marijuana store

3 AAC 306.330. Marijuana inventory tracking system

3 AAC 306.340. Testing required for marijuana and marijuana products

A hearing before the board has been scheduled to discuss the disposition of the items listed above.

Time: 11:15 am
Date: 2-17-17
Location: 550 West 7th Avenue Suite 1600 Conference room, Anchorage, AK 99501

To participate telephonically, you must provide the following investigator the telephone number at which a registered representative of the licensed business may be reached. Your representative will be contacted at this number at the appointed time of hearing.

Investigator: Joe Bankowski
Email address: joe.bankowski@alaska.gov
Phone number: 907-269-0355

If a registered representative of the licensed business does not appear in person or participate telephonically at this hearing, or if after a hearing the board finds that seizure of the marijuana product was justified, the marijuana product may be destroyed.

A registered representative of the licensed business may request a reasonable delay by notifying the investigator listed above no later than 48 hours prior to the hearing. The seized items will remain in the possession of the state until the board has rendered a decision.

Please contact the investigator listed above with any additional questions you may have.

ARTIC HERBERY 2/9/17
12:38pM

RECEIPT OF SEIZED "ACE", ALASKA
CANNABIS EXCHANGE CBD OIL.

QTY: (66) CBD OIL 60ML
QTY: (5) CBD OIL 30ML

INV. J. BANKOWSKI

Jana D. Weltzin
Licensed in Alaska & Arizona
3003 Minnesota Blvd., Suite 201
Anchorage, Alaska 99501
Phone 630-913-1113
Main Office 907-231-3750
JDW, LLC
jana@jdwcounsel.com

February 17, 2017

Marijuana Control Board
Director Chambers
AMCO Enforcement
Sent Via Email

Re: Artic Herbery License No 10037 – Notice of Violation and Hearing on Feb. 17, 2017
RE: Products containing Hemp/CBDs

Dear MCB Members, Director Chambers & AMCO Enforcement Division:

Thank you for your continued efforts with regulating the new commercial marijuana market in Alaska. This correspondence is submitted on behalf of License No. 10037 in response to Notice of Violation ("NOV") Case Number AB17-0071.

On February 9, 2017, enforcement agents entered Arctic Herbery and informed owner Bryant Thorp that the Alaska Cannabis Exchange (ACE) products on his shelf were illegal and seized all ACE products.

Admittedly, Bryant was a little surprised by enforcement's visit on Feb. 9th. On February 6th Bryant received an email from enforcement that noticed him as a "courtesy" that his store was going to be used as a training facility for Metrc for AMCO's staff the very next day. This wasn't an inspection or a request to help out the department and its staff – it was a courtesy notification that Bryant's property would be used for training purposes by the State.

On February 7th, multiple enforcement agents and Metrc trainers entered Arctic Herbery during business hours, and spent two (2) hours doing training with product RFID scanners. The product seized from Arctic Herbery was on the shelves and in full display at that time period. Not one of the several enforcement agents mentioned or took issue with the ACE products on the retail shelves. Again, these are the same products that can be commonly found in grocery stores like Natural Pantry, Rainbow Foods, head shops, etc., and so enforcement likely assumed, just as the majority of these marijuana retail licensees assumed, this is not a marijuana infused product because it is hemp derived.

Jana D. Weltzin
Licensed in Alaska & Arizona
3003 Minnesota Blvd., Suite 201
Anchorage, Alaska 99501
Phone 630-913-1113
Main Office 907-231-3750
JDW, LLC
jana@jdwcounsel.com

The ACE products are whole plant hemp CBD oil – the oil of which purports to be produced in Colorado under the pilot program of the Farm Bill 2014. Public Law 113-79 113th Congress Section 7606 Legitimacy of Industrial Hemp Research subsection (a) outlines the general requirements for an industrial hemp pilot program. Alaska currently does not have an industrial hemp program – but there currently is a bill in the Alaska Legislature (SB 6) which would develop an industrial hemp program – and would amend the applicable marijuana definition at issue to exclude hemp from the definition of marijuana.

The Municipality of Anchorage on December 5, 2016 issued the attached AMC 12.50 Retail Sales Tax on Marijuana and Marijuana Products Informational No. 2 – Industrial Hemp informed the industry and the public that Hemp *"is not considered marijuana. Therefore, the Municipality of Anchorage's position is that industrial hemp is not subject to the retail marijuana sales tax."* The memorandum went on to explain that while both hemp and marijuana come from the same cannabis species, they are **"genetically distinct."** The Anchorage memorandum explained the difference in THC content, which for hemp is less than 0.3% -- the ACE products sold by Arctic Herbery were tested by Steep Hill in California and tested below the 0.3% threshold – confirming these ACE products are indeed hemp derived.

Under the Federal definition of hemp, it is clear that the federal government views hemp and marijuana as two distinct plants. 7 US Code 5940(b)(2) (2) Industrial hemp defines the term "industrial hemp" means the plant Cannabis sativa L. and any part of such plant, whether growing or not, with a delta-9 tetrahydrocannabinol concentration of not more than 0.3 percent on a dry weight basis.

Instead of notifying Bryant via a written letter, or phone call, the decision was made to "raid" his store as well as the majority of existing fledging marijuana retail stores. Thus making national news, and giving the overall appearance to the nation that these stores were funneling illegal products seems a bit contrary to the stated intent of the raids., i.e., to protect the State's commercial industry from Federal intervention.

Bryant has been on the forefront of the Alaska marijuana industry –he is brutally honest with his actions and intent when faced with regulatory hiccups with AMCO. Bryant quite literally paved the way (and cleared a few grey areas up for a cleaner path for those behind him) defining the regulatory interpretations as he has trudge forward. This licensee has always been responsive, upfront, and honest with this department. If enforcement agents were to have called him and had said that they believed these products were not proper to have on his shelves he would not have hesitated to remove them.

Jana D. Weltzin
Licensed in Alaska & Arizona
3003 Minnesota Blvd., Suite 201
Anchorage, Alaska 99501
Phone 630-913-1113
Main Office 907-231-3750
JDW, LLC
jana@jdwcounsel.com

Again, this issue stems back to a larger issue – protecting Alaska's commercial marijuana market from federal intervention – a phone call to Bryant would have created much less press, drama, and negative reactions then a "raid."

A simple google search of "Alaska marijuana retail stores raided" produced 46 top hits, ranging from Alaska news outlets to Virginia. We think it would benefit the industry and the state of Alaska to remember that there's no sense spending a dollar when a penny would do the same.

Please help us keep this industry safe – raids and acts like this over simple misunderstandings make it look like the sky is falling and the state can't handle the regulatory burden that the department is tasked with. This department can handle it – it has built an entire industry from the ground up. Other states had simpler medical commercial market infrastructure to build from to create their recreational program – our AMCO team built this system from scratch, with a handful of amazing individuals that the state is lucky to have as assets. We are so proud of AMCO – it's really unfortunate the shadow of doubt these "raids" have casted throughout the nation on its regulatory ability.

Together we can protect this industry – but we need reciprocal trust – next time, please don't assume the worse, and reach out to the licensee directly.

Sincerely,

Jana D. Weltzin

MUNICIPALITY OF ANCHORAGE

Finance Dep't., Treasury Div. Fax: (907) 343-6677	Mailing Address P.O. Box 196650 Anchorage, AK 99519-6650	Physical Address 632 W. 6th Avenue, 3rd Floor Anchorage, AK 99501

AMC 12.50 Retail Sales Tax on Marijuana and Marijuana Products
INFORMATIONAL #2 Issued: 12/5/2016
Industrial Hemp

Is industrial hemp exempt from the Retail Marijuana Sales Tax?

AMC 12.50.010 defines marijuana as *"all parts of the plant of the genus Cannabis..."* However, industrial hemp is not considered marijuana. Therefore the Municipality of Anchorage's position is that **industrial hemp is not subject to the retail marijuana sales tax**.

What is industrial hemp?

Industrial Hemp refers to the non-psychoactive (less than 0.3% THC) varieties of Cannabis sativa L. Both hemp and marijuana come from the same cannabis species but are genetically distinct. Industrial hemp has no value as a recreational drug due to its non-psychoactive properties. Industrial hemp is usually grown outdoors, in a variety of climates and soil types.

What are uses of industrial hemp?

Industrial hemp has a multitude of uses. Unlike marijuana, which is harvested for the buds, the entire hemp plant can be harvested. Hemp stalk can be used to make biomass energy, paper products, clothes, insulation, plastic and more. Hemp seed can be used to make health food, organic body care and fuel.

Why is the MOA excluding industrial hemp?

Industrial hemp, as defined in U.S. Code Title 7 § 5940(b)(2), distinguishes marijuana from industrial hemp. Colorado has already followed suit by enacting a state law allowing commercial hemp cultivation. Senate Bill 8, an act relating to the regulation and production of industrial hemp, was introduced into the Alaska State Legislature in 2015. Therefore, MOA is also following suit by excluding industrial hemp from the retail marijuana sales tax due to its minimal THC content.

If you have any questions about this matter, please contact the Treasury Division of the Municipality of Anchorage at the numbers listed below between 8:00 a.m. and 5:00 p.m., Monday through Friday, except on holidays.

17999 County Rd. 4
Brighton, Colorado 80603
GreenhouseGrowingSystem.com
303-659-8863

LABORATORY CANNABINOID PROFILE CERTIFICATE OF ANALYSIS	Extraction Date:08-Feb-17 Analysis Date/Time:08-Feb-17, 16:41:09

CUSTOMER INFORMATION		SAMPLE DETAILS	
Company:	Alaska Cannabis Exchange	**Sample name**	ACE Hemp Oil in MCT (30mL)
Contact Person:	Darrick Fitz	**Sample number**	4429
Contact Email:	fitzdarrick@yahoo.com	**Sample Information**	600mg CBD
Contact phone:	303-330-5681		

Substance Potency Analysis

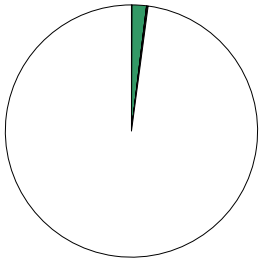
CANNABINOID	Mg. PER GRAM	TOTAL Mg. IN A	1	GRAM PACKAGE (as reported by client)
CBD MAXIMUM *	18.536	18.536		
THC MAXIMUM *	0.735	0.735		
CBDA	0.080	0.080		
CBG	0.602	0.602		
CBD	18.466	18.466		
CBN	0.052	0.052		
THC	0.735	0.735		
CBC	1.143	1.143		
THCA	0.000	0.000		

CANNABINOIDS REPORTED AS "0" WERE BELOW DETECTABLE LEVELS

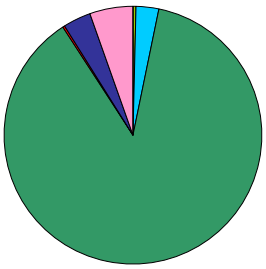
Substance Distribution Analysis

COLOR CODE	CANNABINOID	% BY WEIGHT	Distribution
	CBDA	0.008	0.38%
	CBG	0.060	2.85%
	CBD	1.847	87.61%
	CBN	0.005	0.25%
	THC	0.074	3.49%
	CBC	0.114	5.42%
	THCA	0.000	0.00%

% By Weight



Distribution



White in % by weight is inert material

* All cannabinoids in their acid forms (ending in "A") are convertible to their non-acid forms via a decarboxylation process (heating). The THC and CBD maximum values reported above are the maximum theoretical amounts of THC and CBD the tested product would have if it were fully decarboxylated.

MacKenzie Keller

MacKenzie Keller
Laboratory Director

** Maximum % THC values exceeding three-tenths of one percent (0.3%) on a dry weight basis do not qualify as industrial hemp

** Maximum % THC Value for this sample is: 0.07 %

17999 County Rd. 4
Brighton, Colorado 80603
GreenhouseGrowingSystem.com
303-659-8863

LABORATORY CANNABINOID PROFILE CERTIFICATE OF ANALYSIS	Extraction Date:08-Feb-17 Analysis Date/Time:08-Feb-17, 17:03:58

CUSTOMER INFORMATION		SAMPLE DETAILS	
Company:	Alaska Cannabis Exchange	**Sample name**	ACE CBD Pet Oil in MCT (15mL)
Contact Person:	Darrick Fitz	**Sample number**	4430
Contact Email:	fitzdarrick@yahoo.com	**Sample Information**	150mg CBD
Contact phone:	303-330-5681		

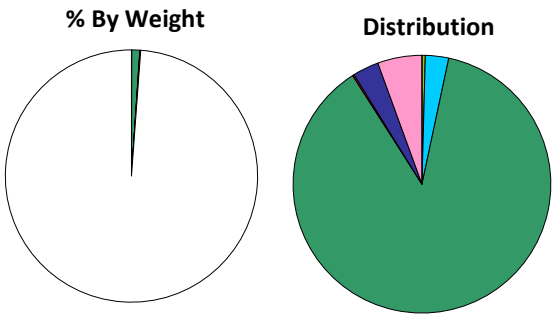
Substance Potency Analysis

CANNABINOID	Mg. PER GRAM	TOTAL Mg. IN A	1	GRAM PACKAGE (as reported by client)
CBD MAXIMUM *	10.303	10.303		
THC MAXIMUM *	0.384	0.384		
CBDA	0.049	0.049		
CBG	0.343	0.343		
CBD	10.260	10.260		
CBN	0.024	0.024		
THC	0.384	0.384		
CBC	0.651	0.651		
THCA	0.000	0.000		

CANNABINOIDS REPORTED AS "0" WERE BELOW DETECTABLE LEVELS

Substance Distribution Analysis

COLOR CODE	CANNABINOID	% BY WEIGHT	Distribution
	CBDA	0.005	0.42%
	CBG	0.034	2.92%
	CBD	1.026	87.61%
	CBN	0.002	0.20%
	THC	0.038	3.28%
	CBC	0.065	5.56%
	THCA	0.000	0.00%



White in % by weight is inert material

* All cannabinoids in their acid forms (ending in "A") are convertible to their non-acid forms via a decarboxylation process (heating). The THC and CBD maximum values reported above are the maximum theoretical amounts of THC and CBD the tested product would have if it were fully decarboxylated.

MacKenzie Keller

MacKenzie Keller
Laboratory Director

** Maximum % THC values exceeding three-tenths of one percent (0.3%) on a dry weight basis do not qualify as industrial hemp

** Maximum % THC Value for this sample is: 0.04 %

17999 County Rd. 4
Brighton, Colorado 80603
GreenhouseGrowingSystem.com
303-659-8863

LABORATORY CANNABINOID PROFILE CERTIFICATE OF ANALYSIS	Extraction Date:08-Feb-17 Analysis Date/Time:08-Feb-17, 16:18:20

CUSTOMER INFORMATION		SAMPLE DETAILS	
Company:	Alaska Cannabis Exchange	**Sample name**	ACE CBD Vape Oil (15mL)
Contact Person:	Darrick Fitz	**Sample number**	4428
Contact Email:	fitzdarrick@yahoo.com	**Sample Information**	150mg CBD
Contact phone:	303-330-5681		

Substance Potency Analysis

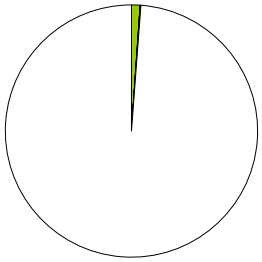
CANNABINOID	Mg. PER GRAM	TOTAL Mg. IN A	1	GRAM PACKAGE (as reported by client)
CBD MAXIMUM *	10.113	10.113		
THC MAXIMUM *	0.274	0.274		
CBDA	10.978	10.978		
CBG	0.024	0.024		
CBD	0.551	0.551		
CBN	0.042	0.042		
THC	0.050	0.050		
CBC	0.046	0.046		
THCA	0.255	0.255		

CANNABINOIDS REPORTED AS "0" WERE BELOW DETECTABLE LEVELS

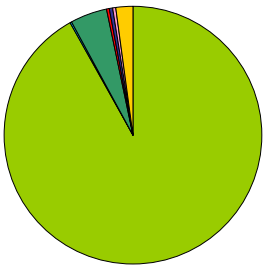
Substance Distribution Analysis

COLOR CODE	CANNABINOID	% BY WEIGHT	Distribution
	CBDA	1.098	91.89%
	CBG	0.002	0.20%
	CBD	0.055	4.61%
	CBN	0.004	0.35%
	THC	0.005	0.42%
	CBC	0.005	0.39%
	THCA	0.026	2.14%

% By Weight



Distribution



White in % by weight is inert material

* All cannabinoids in their acid forms (ending in "A") are convertible to their non-acid forms via a decarboxylation process (heating). The THC and CBD maximum values reported above are the maximum theoretical amounts of THC and CBD the tested product would have if it were fully decarboxylated.

MacKenzie Keller

MacKenzie Keller
Laboratory Director

** Maximum % THC values exceeding three-tenths of one percent (0.3%) on a dry weight basis do not qualify as industrial hemp

** Maximum % THC Value for this sample is: 0.03 %