



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

IN THE MATTER OF:

Delivery via Certified Mail

Tariq Zeiadeh
d/b/a Vape Society Supplies

CID No.: 24-17
Date: April 17, 2024

CIVIL INVESTIGATIVE DEMAND

TO: Tariq Zeiadeh d/b/a Vape Society Supplies
3100 S. Old Highway 63, Ste. 104
Columbia, MO 65201

The Attorney General of the State of Missouri believes it to be in the public interest that an investigation be made to ascertain whether Tariq Zeiadeh d/b/a Vape Society Supplies (“Subject”) has engaged in or is engaging in any practices declared to be unlawful by § 407.020, RSMo. This investigation will inquire into the activities and representations of Subject in connection with the sale of disposable electronic nicotine delivery system (ENDS) products in Missouri. The Attorney General has reason to believe that Subject’s conduct in the aforementioned areas and others involves unfair practices within the scope of the Missouri Merchandising Practices Act.

The Attorney General believes that you have information, documentary material, and/or physical evidence relevant to the investigation described above.

Please note that materials and information produced pursuant to this civil investigative demand may be disclosed to other state and/or federal law-enforcement agencies pursuant to § 407.060.1, RSMo.

DEFINITIONS

In this Civil Investigative Demand, the following terms shall have the meanings set forth herein:

1. “You” and “Your” mean Tariq Zeiadeh d/b/a Vape Society Supplies’ owners, parent companies, subsidiaries, and/or sister companies; and Tariq Zeiadeh d/b/a Vape Society Supplies’ agents, representatives, employees, independent contractors, attorneys, and other persons acting or purporting to act on behalf of the foregoing persons and entities.

2. “Document” includes every “writing,” “recording,” and “photograph” as Federal Rule of Evidence 1001 defines those terms. “Document” includes but is not limited to electronic documents, files, databases, and records, including but not limited to emails, voicemails, text messages, audio recordings of calls, calendar appointments, instant messages, MMS messages, SMS messages, iMessages, computer files, spreadsheets, invoices, billing statements, notes, payment records, financial statements, and metadata.

3. “Your Products” means any and all products sold by You, including but not limited to disposable electronic nicotine delivery system products sold online through vapesocietysupplies.com or other platforms, telephone orders, and in-person sales.

4. “Terms of Sale” means, at a minimum, information sufficient to identify the quantity, brand name, item name, price, and date of the sale.

5. “All” and “any” shall each be construed to encompass the meanings of the words “all” and “any.”

DEMAND FOR DOCUMENTS AND INFORMATION

Unless otherwise specified, the time frame for the documents and information requested below is January 1, 2021 to present.

Pursuant to § 407.040, RSMo, the Attorney General requests that you produce the documents and information requested in this Civil Investigative Demand, to the extent that they are within your possession, custody, and/or control, **by May 10, 2024.**

Your document production must comply with the Missouri Office of the Attorney General Production Specifications and Data Delivery Standards, a copy of which is attached hereto.

In responding to each Request contained in this civil investigative demand, You should identify—by Bates range, or by file names and locations—which Documents are responsive to each Request.

If You withhold any responsive materials based on an assertion of privilege and/or the work-product doctrine, the Attorney General's Office reserves the right to request that you provide a privilege log that provides—for each Document withheld—sufficient information to permit the Attorney General's Office to assess the applicability of the privilege and/or the work-product doctrine.

SPECIFIC DEMANDS:

1. Identify Your business's owners, officers, executives, senior managers, and/or directors, and provide a copy of Your organizational chart, if any.
2. For each individual identified in response to Demand No. 1, provide his or her position within Your business, address, telephone number, and email address.
3. Identify all physical locations where You conduct business within the State of Missouri.
4. Identify all employees, including their names, addresses, phone numbers, and email addresses, who worked at your business location(s) in Missouri on or after January 1, 2021.
5. Identify all methods by which You sell Your Products, including but not limited to online sales, telephone orders, and same-store sales.
6. Identify all Internet platforms through which You sell Your Products (*e.g.*, Amazon.com, Ebay.com), including any websites owned or operated by You on which you advertise or sell products.

7. Provide a copy of Your most recent sales catalogue or listing of Your Products.
8. Identify, or provide documents sufficient to show, all Missouri purchasers to whom You have sold any of Your Products on or after January 1, 2021.
9. Provide documents memorializing the Terms of Sale of Your Products to each Missouri purchaser identified in response to Demand No. 8.
10. For each disposable ENDS Product You have sold since January 1, 2021, please identify said Product and provide the date on which you began selling said Product.
11. As to each of Your Products listed in Demand No. 10, state the number of units in your inventory as of December 1, 2020.
12. As to each of Your Products listed in Demand No. 10, identify your quantity of sales from January 1, 2021 to the present.
13. As to each of Your Products listed in Demand No. 10, identify all wholesalers or suppliers from which You purchased the Product from January 1, 2020 to present. Provide the name, address, phone number, and email address for each such wholesaler or supplier.
14. As to each of Your Products listed in Demand No. 10, identify the dates on which You purchased the product from wholesalers or suppliers. Provide documentation to corroborate these dates.
15. As to each of Your Products listed in Demand No. 10, identify all prices You have paid to a wholesaler or supplier. Provide documentation to corroborate these prices.
16. As to each of Your Products listed in Demand No. 10, identify all customers who purchased said products on or after January 1, 2021, including their names, addresses, telephone numbers, and email addresses.
17. As to each of Your Products listed in Demand No. 10, identify each application, submission, report, or other document You have

submitted to any government agency in attempt to comply with federal tobacco laws, including, but not limited to, the Federal Food, Drug, and Cosmetic Act (21 U.S.C. § 301 et seq.) and the Prevent All Cigarette Trafficking Act (15 U.S.C. § 375 et seq.) Provide documentation to corroborate each application, submission, or report.

18. As to each of Your Products listed in Demand No. 10, identify each application, submission, report, or other document You have submitted to any government agency in attempt to comply with state tobacco laws. Provide document to corroborate each application, submission, or report.
19. Provide all documents memorializing communications between You and Your wholesalers or suppliers regarding the legal status of Your Products from January 1, 2021 to present.

The Attorney General's Office may serve additional or subsequent civil investigative demands on you.

Attorney General's Office Contact Information:

If you have questions regarding this Civil Investigative Demand and would like to discuss compliance, please contact Luke Hawley at Luke.Hawley@ago.mo.gov or (314)-340-4877.

Please note, contacting our office to discuss compliance does not relieve you from the deadline to respond to this Civil Investigative Demand. No extension of the deadline for compliance with this civil investigative demand shall be effective unless it is reflected in a writing executed by an authorized representative of the Attorney General.

Compliance Instructions:

Before submitting the following Certification of Compliance and responsive documents and information, you must contact Luke Hawley at Luke.Hawley@ago.mo.gov or (314)-340-4877 to provide notice that the delivery will be made.

To submit the Certification of Compliance and all responsive documents and information via email, please send to:

Luke.Hawley@ago.mo.gov

To submit the Certification of Compliance and all responsive documents and information via U.S. Mail, please send to:

Luke Hawley
Missouri Attorney General's Office
815 Olive Street, Ste. 200
St. Louis, MO 63101
(314) 340-4877

ANDREW BAILEY
MISSOURI ATTORNEY GENERAL

/s/ Luke A. Hawley
Luke A. Hawley, MO Bar #73749
Assistant Attorney General
Missouri Attorney General's Office
815 Olive Street, Ste. 200
St. Louis, MO 63101
(314) 340-4877



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

IN THE MATTER OF:

Delivery via Certified Mail

Cara Buchanan
d/b/a Smoke Smart, LLC

CID No.: 24-18
Date: April 17, 2024

CIVIL INVESTIGATIVE DEMAND

TO: Cara Buchanan d/b/a Smoke Smart, LLC
627 Giotti Court
Wentzville, MO 63385

The Attorney General of the State of Missouri believes it to be in the public interest that an investigation be made to ascertain whether Cara Buchanan d/b/a Smoke Smart, LLC (“Subject”) has engaged in or is engaging in any practices declared to be unlawful by § 407.020, RSMo. This investigation will inquire into the activities and representations of Subject in connection with the sale of disposable electronic nicotine delivery system (ENDS) products in Missouri. The Attorney General has reason to believe that Subject’s conduct in the aforementioned areas and others involves deception and/or unfair practices within the scope of the Missouri Merchandising Practices Act.

The Attorney General believes that you have information, documentary material, and/or physical evidence relevant to the investigation described above.

Please note that materials and information produced pursuant to this civil investigative demand may be disclosed to other state and/or federal law-enforcement agencies pursuant to § 407.060.1, RSMo.

DEFINITIONS

In this Civil Investigative Demand, the following terms shall have the meanings set forth herein:

1. “You” and “Your” mean Cara Buchanan d/b/a Smoke Smart, LLC’s owners, parent companies, subsidiaries, and/or sister companies; and Cara Buchanan d/b/a Smoke Smart, LLC’s agents, representatives, employees, independent contractors, attorneys, and other persons acting or purporting to act on behalf of the foregoing persons and entities.

2. “Document” includes every “writing,” “recording,” and “photograph” as Federal Rule of Evidence 1001 defines those terms. “Document” includes but is not limited to electronic documents, files, databases, and records, including but not limited to emails, voicemails, text messages, audio recordings of calls, calendar appointments, instant messages, MMS messages, SMS messages, iMessages, computer files, spreadsheets, invoices, billing statements, notes, payment records, financial statements, and metadata.

3. “Your Products” means any and all products sold by You, including but not limited to disposable electronic nicotine distribution system products sold online through smokesmartllc.com or other platforms, telephone orders, and in-person sales.

4. “Terms of Sale” means, at a minimum, information sufficient to identify the quantity, brand name, item name, price, and date of the sale.

5. “All” and “any” shall each be construed to encompass the meanings of the words “all” and “any.”

DEMAND FOR DOCUMENTS AND INFORMATION

Unless otherwise specified, the time frame for the documents and information requested below is January 1, 2021 to present.

Pursuant to § 407.040, RSMo, the Attorney General requests that you produce the documents and information requested in this Civil Investigative Demand, to the extent that they are within your possession, custody, and/or control, **by May 10, 2024.**

Your document production must comply with the Missouri Office of the Attorney General Production Specifications and Data Delivery Standards, a copy of which is attached hereto.

In responding to each Request contained in this civil investigative demand, You should identify—by Bates range, or by file names and locations—which Documents are responsive to each Request.

If You withhold any responsive materials based on an assertion of privilege and/or the work-product doctrine, the Attorney General's Office reserves the right to request that you provide a privilege log that provides—for each Document withheld—sufficient information to permit the Attorney General's Office to assess the applicability of the privilege and/or the work-product doctrine.

SPECIFIC DEMANDS:

1. Identify Your business's owners, officers, executives, senior managers, and/or directors, and provide a copy of Your organizational chart, if any.
2. For each individual identified in response to Demand No. 1, provide his or her position within Your business, address, telephone number, and email address.
3. Identify all physical locations where You conduct business within the State of Missouri.
4. Identify all employees, including their names, addresses, phone numbers, and email addresses, who worked at your business location(s) in Missouri on or after January 1, 2021.
5. Identify all methods by which You sell Your Products, including but not limited to online sales, telephone orders, and same-store sales.
6. Identify all Internet platforms through which You sell Your Products (*e.g.*, Amazon.com, Ebay.com), including any websites owned or operated by You on which you advertise or sell products.

7. Provide a copy of Your most recent sales catalogue or listing of Your Products.
8. Identify, or provide documents sufficient to show, all Missouri purchasers to whom You have sold any of Your Products on or after January 1, 2021.
9. Provide documentation sufficient to detail the manner in which each of Your Products were shipped to Missouri purchasers as identified in response to Demand No. 8.
10. Provide documents memorializing the Terms of Sale of Your Products to each Missouri purchaser identified in response to Demand No. 8.
11. For each disposable ENDS Product You have sold since January 1, 2021, please identify said Product and provide the date on which you began selling said Product.
12. As to each of Your Products listed in Demand No. 10, state the number of units in your inventory as of December 1, 2020.
13. As to each of Your Products listed in Demand No. 10, identify your quantity of sales from January 1, 2021 to the present.
14. As to each of Your Products listed in Demand No. 10, identify all wholesalers or suppliers from which You purchased the Product from January 1, 2020 to present. Provide the name, address, phone number, and email address for each such wholesaler or supplier.
15. As to each of Your Products listed in Demand No. 10, identify the dates on which You purchased the product from wholesalers or suppliers. Provide documentation to corroborate these dates.
16. As to each of Your Products listed in Demand No. 10, identify all customers who purchased said products on or after January 1, 2021, including their names, addresses, telephone numbers, and email addresses.
17. As to each of Your Products listed in Demand No. 10, identify each application, submission, report, or other document You have

submitted to any government agency in attempt to comply with federal tobacco laws, including, but not limited to, the Federal Food, Drug, and Cosmetic Act (21 U.S.C. § 301 et seq.) and the Prevent All Cigarette Trafficking Act (15 U.S.C. § 375 et seq.) Provide documentation to corroborate each application, submission, or report.

18. As to each of Your Products listed in Demand No. 10, identify each application, submission, report, or other document You have submitted to any government agency in attempt to comply with state tobacco laws. Provide document to corroborate each application, submission, or report.
19. Provide all documents memorializing communications between You and Your wholesalers or suppliers regarding the legal status of Your Products from January 1, 2020 to present.
20. Provide copies of all permits, licenses, or other certificates or documents which have been issued to You by any government entity, including any federal agency, which purport to allow You to sell Your Products to consumers in Missouri.

The Attorney General's Office may serve additional or subsequent civil investigative demands on you.

Attorney General's Office Contact Information:

If you have questions regarding this Civil Investigative Demand and would like to discuss compliance, please contact Luke Hawley at Luke.Hawley@ago.mo.gov or (314)-340-4877.

Please note, contacting our office to discuss compliance does not relieve you from the deadline to respond to this Civil Investigative Demand. No extension of the deadline for compliance with this civil investigative demand shall be effective unless it is reflected in a writing executed by an authorized representative of the Attorney General.

Compliance Instructions:

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Luke Hawley
Missouri Attorney General's Office
815 Olive Street, Ste. 200
St. Louis, MO 63101
(314) 340-4877

ANDREW BAILEY
MISSOURI ATTORNEY GENERAL

/s/ Luke A. Hawley
Luke A. Hawley, MO Bar #73749
Assistant Attorney General
Missouri Attorney General's Office
815 Olive Street, Ste. 200
St. Louis, MO 63101
(314) 340-4877



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

IN THE MATTER OF:

Delivery Via Certified Mail

American Shaman Manufacturing, Inc.

CID No. 24-20
April 17, 2024

CIVIL INVESTIGATIVE DEMAND

TO: American Shaman Manufacturing, Inc.
1600 Baltimore Ave, Ste 200A
Kansas City, MO 64108

The Attorney General of the State of Missouri believes it to be in the public interest that an investigation be made to ascertain whether American Shaman Manufacturing, Inc., (“Subject”) has engaged in or is engaging in any practices declared to be unlawful by § 407.020, RSMo. This investigation will inquire into the activities and representations of Subject in connection with the manufacturing, sale, marketing, advertisement, promotion, and/or distribution of products containing CBD, Delta-8, and Delta-9 THC. The Attorney General has reason to believe that Subject has used deception, fraud, false promise, misrepresentation, unfair practices, and/or the concealment, suppression, or omission of material facts in connection with the sale or advertisement of CBD, Delta-8, and Delta-9 THC products.

Please note that this demand may be subject to disclosure to other state and/or federal law-enforcement agencies pursuant to § 407.060.1, RSMo.

The Attorney General believes that you have information, documentary material, and/or physical evidence relevant to the investigation described above.

DEFINITIONS

In this Civil Investigative Demand, the following terms shall have the meanings set forth herein:

1. “You” and “Your” mean American Shaman Manufacturing, Inc. and all LLC’s subsidiaries, parent companies, and sister companies; and all agents, representatives, employees, independent contractors, and other persons acting or purporting to act on behalf of CBD American Shaman Manufacturing, Inc. and/or its subsidiaries, parent companies, or sister companies.

2. “Document” includes every “writing,” “recording,” and “photograph” as Federal Rule of Evidence 1001 defines those terms, as well as any “duplicate” of any writing, recording, or photograph. “Document” includes but is not limited to electronic documents, files, and records, including but not limited to emails, voicemails, text messages, calendar appointments, instant messages, MMS messages, SMS messages, iMessages, computer files, spreadsheets, and metadata. The term Document includes every draft of any other material that falls within the definition of Document.

3. “Communication” means any expression, statement, conveyance, or dissemination of any words, thoughts, statements, ideas, or information, regardless of form, format, or kind. “Communication” includes but is not limited to oral or written communications of any kind, such as telephone conversations, discussions, meetings, notes, letters, agreements, emails or other electronic communications, facsimiles, and other forms of written or oral exchange that are recorded in any way, including video recordings, audio recordings, written notes, or otherwise. Any Communication that also falls within the definition of “Document” shall constitute both a Document and a Communication for purposes of this civil investigative demand.

4. With regard to a person, “Identify” means to state with specificity the person’s legal name, aliases, last-known home address, last-known business address, current employer, current job title, all known telephone numbers, and all known email addresses.

5. With regard to a Communication, “Identify” means to state with specificity the date of the Communication; the medium of communication; the location of the Communication; the name(s) and alias(es) of the person(s) who made the Communication; and the name(s) and alias(es) of all persons who were present when the statement was made, who received the Communication, who heard the Communication, or who came to know of the content of the Communication at a later time.

6. “Hemp” means any part, derivative, or extract of a *Cannabis sativa L.* plant that contains 0.3% or less of THC (tetrahydrocannabinol) on a dry weight basis.

7. “CBD” and “Cannabidiol” mean a compound that is present in cannabis.

8. “Delta-8” “Delta-8 tetrahydrocannabinol” and “Delta-8 TCH” mean a psychoactive substance found in the *Cannabis sativa* plant, of which marijuana and hemp are two varieties.

9. “Delta-9” “Delta-9 tetrahydrocannabinol” and “Delta-9 TCH” mean a psychoactive substance found in the *Cannabis sativa* plant, of which marijuana and hemp are two varieties, and which may be created by chemical conversion of other cannabinoids.

10. “Psychoactive cannabinoids” means types of THC and other cannabinoids that are capable of affecting mental activity and have psychoactive effect, including but not limited

to the following: THC-P, HHC, THC-O, THC-A, Delta-10 THC, THC-H, THC-B, THC- JD, THC-X, HHC-P, and Delta-11 THC.

11. “Advertising” shall have the meaning set forth in § 407.010(1), RSMo.

12. “Current Good Manufacturing Practice (CGMP) regulations” means the process the FDA undertakes to ensure the quality of drug products by carefully monitoring drug manufacturers' compliance with its Current Good Manufacturing Practice (CGMP) regulations. The CGMP regulations for drugs contain minimum requirements for the methods, facilities, and controls used in manufacturing, processing, and packing of a drug product. The regulations make sure that a product is safe for use, and that it has the ingredients and strength it claims to have.

13. “Federal Food, Drug, and Cosmetic Act (FD&C Act)” means The 1938 Federal Food, Drug, and Cosmetic Act (FDCA) which is a set of United States (US) laws that authorize the Food and Drug Administration (FDA) to oversee and regulate the production, sale, and distribution of food, drugs, medical devices, and cosmetics.

DEMAND FOR DOCUMENTS AND INFORMATION

Pursuant to § 407.030, RSMo, the Attorney General’s Office demands that—no later than 10:00 a.m. on May 20, 2024—You produce the following documents and information, to the extent that they are within your possession, custody, and/or control:

1. Identify every product containing cannabidiol (CBD), tetrahydrocannabinol (THC), or hemp that You have manufactured, produced, marketed, distributed, advertised, and/or sold at any time from April 1, 2020 to the present.

2. Identify the manufacturing source(s) for all CBD, THC, hemp and hemp extract products that You have manufactured, produced, marketed, distributed, advertised, and/or sold at any time from April 1, 2020 to the present.

3. Describe whether the manufacturing source(s) for all CBD, THC, hemp or hemp extract products that You have manufactured, produced, marketed, distributed, advertised, and/or sold at any time from April 1, 2020 to the present adhere to Current Good Manufacturing Practices (CGMP) regulations outlined by the Food and Drug Administration (FDA).

4. Identify every website that You created, controlled, and/or maintained that discussed or related in any way to the sale of CBD, THC, hemp or hemp extract products.

5. Describe whether You adhere to the guidelines set by the FDA regarding the marketing and sale of hemp-derived products, including Delta-8 and Delta-9 THC and any other psychoactive cannabinoids, and whether You are in compliance with the Federal Food, Drug, and Cosmetic Act (FD&C Act).

6. Describe whether Your sales practices are compliant with state and local regulations regarding the sale of hemp-derived products, including age restrictions and licensing requirements.

7. Describe Your processes and procedures pertaining to the handling of product returns, recalls and customer complaints related to CBD, Delta-8, and Delta-9 THC, and any other psychoactive cannabinoid products manufactured, distributed and/or sold by American Shaman Manufacturing, Inc.

8. Describe the training that Your staff members undergo, including whether they are trained to provide accurate information about CBD, Delta-8, and Delta-9 THC, and any other psychoactive cannabinoid products, including their legal status, usage and potential effects.

9. Identify any measures taken to ensure the quality and safety of your cannabidiol products, including any certifications, certificates of analysis (COAs), or industry standards that you adhere to confirming that the products being sold meet regulatory requirements and are free from contaminants.

10. Identify measures taken to ensure proper labeling of your CBD, Delta-8, and Delta-9 THC, and any other psychoactive cannabinoid products, including accurate cannabinoid content, serving sizes and health-related claims.

11. Identify the testing facilities where all CBD, THC, hemp and hemp extract products that You have manufactured, produced, marketed, distributed, advertised, and/or sold at any time from April 1, 2020 to the present are tested.

12. Describe the testing regimen that all CBD, THC, hemp and hemp extract products that You have manufactured, produced, marketed, distributed, advertised, and/or sold at any time from April 1, 2020 to the present undergo to verify the quantity of Delta-8 or Delta-9 THC, or any other psychoactive cannabinoid that each product contains.

13. Describe the corporate structure of American Shaman Manufacturing, Inc., including the names and contact information of all individuals and corporate entities with a financial interest in your business.

The Attorney General's Office may serve additional or subsequent civil investigative demands on you.

Please note that § 407.080, RSMo, makes certain acts done with the intent to avoid, evade, or prevent compliance in whole or in part with any civil investigative demand a Class A misdemeanor, which is punishable by a fine not to exceed \$1,000 for individuals and \$5,000 for corporations, or by imprisonment for a term of not more than one year, or both a fine and imprisonment.

Submit the following Certification of Compliance and all responsive documents and information to:

Steven Reed
Missouri Attorney General's Office
P.O. Box 899
Jefferson City, Missouri 65101
573-751-8790
steven.reed@ago.mo.gov

ANDREW BAILEY
MISSOURI ATTORNEY GENERAL

/s/ Keith Wade
Keith Wade, MO Bar #74889
Assistant Attorneys General
P.O. Box 899
Jefferson City, MO 65102
Phone: (573) 751-6078
Fax: (573) 751-0774
Keith.Wade@ago.mo.gov



ATTORNEY GENERAL OF MISSOURI
ANDREW BAILEY

IN THE MATTER OF:

Delivery Via Certified Mail

CBD Kratom Connect LLC

CID No. 24-19
April 17, 2024

CIVIL INVESTIGATIVE DEMAND

TO: CBD Kratom Connect LLC.
4203 Kahlua Ln
St. Louis, MO 63129

The Attorney General of the State of Missouri believes it to be in the public interest that an investigation be made to ascertain whether CBD Kratom Connect LLC., (“Subject”) has engaged in or is engaging in any practices declared to be unlawful by § 407.020, RSMo. This investigation will inquire into the activities and representations of Subject in connection with the manufacturing, sale, marketing, advertisement, promotion, and/or distribution of products containing CBD, Delta-8, and Delta-9 THC. The Attorney General has reason to believe that Subject has used deception, fraud, false promise, misrepresentation, unfair practices, and/or the concealment, suppression, or omission of material facts in connection with the sale or advertisement of CBD, Delta-8, and Delta-9 THC products.

Please note that this demand may be subject to disclosure to other state and/or federal law-enforcement agencies pursuant to § 407.060.1, RSMo.

The Attorney General believes that you have information, documentary material, and/or physical evidence relevant to the investigation described above.

DEFINITIONS

In this Civil Investigative Demand, the following terms shall have the meanings set forth herein:

1. “You” and “Your” mean CBD Kratom Connect LLC. and all LLC’s subsidiaries, parent companies, and sister companies; and all agents, representatives, employees, independent contractors, and other persons acting or purporting to act on behalf of CBD Kratom Connect LLC. and/or its subsidiaries, parent companies, or sister companies.

2. “Document” includes every “writing,” “recording,” and “photograph” as Federal Rule of Evidence 1001 defines those terms, as well as any “duplicate” of any writing, recording, or photograph. “Document” includes but is not limited to electronic documents, files, and records, including but not limited to emails, voicemails, text messages, calendar appointments, instant messages, MMS messages, SMS messages, iMessages, computer files, spreadsheets, and metadata. The term Document includes every draft of any other material that falls within the definition of Document.

3. “Communication” means any expression, statement, conveyance, or dissemination of any words, thoughts, statements, ideas, or information, regardless of form, format, or kind. “Communication” includes but is not limited to oral or written communications of any kind, such as telephone conversations, discussions, meetings, notes, letters, agreements, emails or other electronic communications, facsimiles, and other forms of written or oral exchange that are recorded in any way, including video recordings, audio recordings, written notes, or otherwise. Any Communication that also falls within the definition of “Document” shall constitute both a Document and a Communication for purposes of this civil investigative demand.

4. With regard to a person, “Identify” means to state with specificity the person’s legal name, aliases, last-known home address, last-known business address, current employer, current job title, all known telephone numbers, and all known email addresses.

5. With regard to a Communication, “Identify” means to state with specificity the date of the Communication; the medium of communication; the location of the Communication; the name(s) and alias(es) of the person(s) who made the Communication; and the name(s) and alias(es) of all persons who were present when the statement was made, who received the Communication, who heard the Communication, or who came to know of the content of the Communication at a later time.

6. “Hemp” means any part, derivative, or extract of a *Cannabis sativa L.* plant that contains 0.3% or less of THC (tetrahydrocannabinol) on a dry weight basis.

7. “CBD” and “Cannabidiol” mean a compound that is present in cannabis.

8. “Delta-8” “Delta-8 tetrahydrocannabinol” and “Delta-8 TCH” mean a psychoactive substance found in the *Cannabis sativa* plant, of which marijuana and hemp are two varieties.

9. “Delta-9” “Delta-9 tetrahydrocannabinol” and “Delta-9 TCH” mean a psychoactive substance found in the *Cannabis sativa* plant, of which marijuana and hemp are two varieties, and which may be created by chemical conversion of other cannabinoids.

10. “Psychoactive cannabinoids” means types of THC and other cannabinoids that are capable of affecting mental activity and have psychoactive effect, including but not limited

to the following: THC-P, HHC, THC-O, THC-A, Delta-10 THC, THC-H, THC-B, THC- JD, THC-X, HHC-P, and Delta-11 THC.

11. “Advertising” shall have the meaning set forth in § 407.010(1), RSMo.

12. “Current Good Manufacturing Practice (CGMP) regulations” means the process the FDA undertakes to ensure the quality of drug products by carefully monitoring drug manufacturers' compliance with its Current Good Manufacturing Practice (CGMP) regulations. The CGMP regulations for drugs contain minimum requirements for the methods, facilities, and controls used in manufacturing, processing, and packing of a drug product. The regulations make sure that a product is safe for use, and that it has the ingredients and strength it claims to have.

13. “Federal Food, Drug, and Cosmetic Act (FD&C Act)” means The 1938 Federal Food, Drug, and Cosmetic Act (FDCA) which is a set of United States (US) laws that authorize the Food and Drug Administration (FDA) to oversee and regulate the production, sale, and distribution of food, drugs, medical devices, and cosmetics.

DEMAND FOR DOCUMENTS AND INFORMATION

Pursuant to § 407.030, RSMo, the Attorney General’s Office demands that—no later than 10:00 a.m. on May 20, 2024—You produce the following documents and information, to the extent that they are within your possession, custody, and/or control:

1. Identify every product containing cannabidiol (CBD), tetrahydrocannabinol (THC), or hemp that You have manufactured, produced, marketed, distributed, advertised, and/or sold at any time from April 1, 2020 to the present.

2. Identify the manufacturing source(s) for all CBD, THC, hemp and hemp extract products that You have manufactured, produced, marketed, distributed, advertised, and/or sold at any time from April 1, 2020 to the present.

3. Describe whether the manufacturing source(s) for all CBD, THC, hemp or hemp extract products that You have manufactured, produced, marketed, distributed, advertised, and/or sold at any time from April 1, 2020 to the present adhere to Current Good Manufacturing Practices (CGMP) regulations outlined by the Food and Drug Administration (FDA).

4. Identify every website that You created, controlled, and/or maintained that discussed or related in any way to the sale of CBD, THC, hemp or hemp extract products.

5. Describe whether You adhere to the guidelines set by the FDA regarding the marketing and sale of hemp-derived products, including Delta-8 and Delta-9 THC and any other psychoactive cannabinoids, and whether You are in compliance with the Federal Food, Drug, and Cosmetic Act (FD&C Act).

6. Describe whether Your sales practices are compliant with state and local regulations regarding the sale of hemp-derived products, including age restrictions and licensing requirements.

7. Describe Your processes and procedures pertaining to the handling of product returns, recalls and customer complaints related to CBD, Delta-8, and Delta-9 THC, and any other psychoactive cannabinoid products manufactured, distributed and/or sold by CBD Kratom Connect, LLC.

8. Describe the training that Your staff members undergo, including whether they are trained to provide accurate information about CBD, Delta-8, and Delta-9 THC, and any other psychoactive cannabinoid products, including their legal status, usage and potential effects.

9. Identify any measures taken to ensure the quality and safety of your cannabidiol products, including any certifications certificates of analysis (COAs), or industry standards that you adhere to confirming that the products being sold meet regulatory requirements and are free from contaminants.

10. Identify measures taken to ensure proper labeling of your CBD, Delta-8, and Delta-9 THC, and any other psychoactive cannabinoid products, including accurate cannabinoid content, serving sizes and health-related claims.

11. Identify the testing facilities where all CBD, THC, hemp and hemp extract products that You have manufactured, produced, marketed, distributed, advertised, and/or sold at any time from April 1, 2020 to the present are tested.

12. Describe the testing regimen that all CBD, THC, hemp and hemp extract products that You have manufactured, produced, marketed, distributed, advertised, and/or sold at any time from April 1, 2020 to the present undergo to verify the quantity of Delta-8 or Delta-9 THC, or any other psychoactive cannabinoid that each product contains.

13. Describe the corporate structure of CBD Kratom Connect LLC., including the names and contact information of all individuals and corporate entities with a financial interest in your business.

The Attorney General's Office may serve additional or subsequent civil investigative demands on you.

Please note that § 407.080, RSMo, makes certain acts done with the intent to avoid, evade, or prevent compliance in whole or in part with any civil investigative demand a Class A misdemeanor, which is punishable by a fine not to exceed \$1,000 for individuals and \$5,000 for corporations, or by imprisonment for a term of not more than one year, or both a fine and imprisonment.

Submit the following Certification of Compliance and all responsive documents and information to:

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