ATTORNEY GENERAL OF MISSOURI

CATHERINE L. HANAWAY

IN THE MATTER OF: CID No. 25-100

Swin LLC d/b/a Swin Dispensaries November 24, 2025

CIVIL INVESTIGATIVE DEMAND

TO: Swin LLC d/b/a Swin Dispensaries

Serve: Blake Bryan Swindall
180 Mall Road, Suite E
Hollister, MO 65672

The Attorney General of the State of Missouri believes it to be in the public interest that an investigation be made to ascertain whether Swin LLC d/b/a Swin Dispensaries ("Subject"), its agents or employees, or others in the state providing for the manufacturing, shipping, sale, or distribution of products containing "Intoxicating Cannabinoid Products" (defined *infra*) in violation of § 407.020, RSMo. This investigation will inquire into, among other things, the activities and representations of Subject in connection with products and services offered for sale in the State of Missouri. The Attorney General has reason to believe that Subject or others in the state may have used deception, fraud, false promises, misrepresentation, unfair practices, and/or the concealment, suppression, or omission of material facts within the scope of, and in violation of, the Missouri Merchandising Practices Act (the "MMPA"). The Attorney General's investigation is based in part on, but is not limited to: (1) collected images, materials, and other information demonstrating that certain products referenced in the CID potentially violating the MMPA, federal statutes, or other state statutes are offered for sale by the Subject in the State of Missouri; (2) advertisements made by the Subject suggesting that certain products referenced in the CID potentially violating the MMPA, federal statutes, or other state statutes are offered for sale by the Subject in the State of Missouri; and (3) public statements by the Subject referencing or referring to certain products referenced in the CID potentially violating the MMPA, federal statutes, or other state statutes that are offered for sale by the Subject in the State of Missouri.

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

compliance with this Civil Investigative Demand is mandatory and required by law. *See* § 407.080, RSMo. ("A person upon whom a civil investigative demand is served pursuant to the provisions of section 407.040 shall comply with the terms thereof unless otherwise provided by an order of a court.").

INSTRUCTIONS

1. Unless specifically stated otherwise, please restrict your search for all information and documents requested below to only the period between which You first began offering for sale any products containing "Intoxicating Cannabinoids" or "Hemp" as defined *infra*, and the present.

2. For all of your responses, You must identify—by Bates range, or by file names and locations—the Documents responsive to each particular request.

3. For each Document produced or answer provided, identify by number which request or requests the Document or answer responds to.

4. For requests seeking written answers, provide the answer in **boldface** in a paragraph or paragraphs directly beneath the numerical request.

5. If you have knowledge of a responsive Document or responsive information, but do not have the responsive Document or information in your possession, custody, or control, Identify the Person that you believe has that Document or information in their possession, custody, or control.

6. If You do not know the answer to a request, Identify the Person that You believe does have that responsive information.

7. Your answers to requests for information must be signed under oath by the Person providing the responsive information. This might entail separate Persons verifying responses to different requests.

8. Provide all material as quickly as possible, which may mean providing responsive material in batches.

9. If You believe that You have responsive materials that are privileged, You must produce a privilege log that identifies each Document or communication, the basis for withholding it, and sufficient information to permit the Attorney General's Office to assess whether it is privileged.

10. The Missouri Attorney General may serve additional or follow-up civil investigative demands on You.

11. Please note that under § 407.080, RSMo, certain acts done with the intent to avoid, evade, or prevent compliance in whole or in part with any civil investigative demand constitute a Class A misdemeanor, which is punishable by fines or imprisonment or both.

12. No extension of the deadline for compliance with this Civil Investigative Demand is effective unless it is reflected in writing by an authorized representative of the Missouri Attorney General.

13. As authorized by § 407.040, RSMo, the Attorney General demands that—no later than 10:00 a.m. CDT on December 22, 2025—You produce responsive documents and information to the Missouri Attorney General's Office. Submit the Certification of Compliance, all documents, and all responsive information, to:

Connor H. McNeall
Assistant Attorney General
Missouri Attorney General's Office
815 Olive Street, Ste. 200
St. Louis, MO 63101
Connor. McNeall@ago.mo.gov
(314) 340-7888

DEFINITIONS

As used in this Civil Investigative Demand, the following definitions apply:

1. "You" and "Your" means Swin LLC d/b/a Swin Dispensaries, and all agents, representatives, employees, independent contractors, attorneys, and any other persons acting or purporting to act on behalf of Swin LLC d/b/a Swin Dispensaries or its subsidiaries, parent companies, or sister companies.

2. "And" and "or" are to be construed broadly to include both the disjunctive and conjunctive, to be equivalent to "and/or," to render these Requests as broad as possible.

3. "Customer" means any person or entity who has purchased any Cannabis Product, as defined *infra*, from You in the State of Missouri.

4. "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, text messages, 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" constitutes both a Document and a Communication for purposes of this civil investigative demand.

5. "Document" includes every "writing," "recording," and "photograph" as the 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, databases 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.

6. "Identify," when used with respect to a person or entity, means information sufficient to allow the Attorney General to ascertain the current contact information (name, home or business address, telephone number, and email), and, if not a natural person, the current contact information for Your point of contact with the entity or facility Identified, as well as the relationship of that person or entity to You.

7. "Identify," when used with respect to a fact or event, means information sufficient to allow employees of the Attorney General to ascertain the fact or event with reasonable particularity, and to identify each person believed to have knowledge with respect to the fact or event and each document that refers or relates to the fact or event.

8. "Identify," when used with respect to a transaction, means to provide information sufficient to allow ascertainment of the banking and financial information of the sending and receiving parties, the method of payment or funds transfer, and the natural persons involved with the transfer or payment.

9. "Identify," when used with respect to a Communication, means to state with specificity the date of the Communication; the medium of communication; the location of the Communication; the names and aliases of the persons who made the Communication; and the names and aliases 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.

10. "Person" means any natural person, corporation, proprietorship, partnership, association, firm, or entity of any kind.

11. "Relating to," "related to," and "relate to" mean to be relevant in any way to the subject matter, including, without limitation, all information that directly or indirectly contains, records, reflects, summarizes, evaluates, refers to, is pertinent to, indicates, comments upon, or discusses the subject matter; or that states the background of, or was the basis for, or that records, evaluates, comments, was referred to, relied upon, utilized, generated, transmitted, or received in arriving at any conclusion, opinion, estimate, position, decision, belief, policy, practice, course of business, course of conduct, procedure, or assertion concerning the subject matter.

12. "FDA" means the U.S. Food and Drug Administration, including all agents, representatives, employees, independent contractors, attorneys, and any other persons acting or purporting to act on behalf of the U.S. Food and Drug Administration.

13. "DHSS" means the Missouri Department of Health and Senior Services, including all agents, representatives, employees, independent contractors, attorneys, and any other persons acting or purporting to act on behalf of the Missouri Department of Health and Senior Services.

14. "Marijuana" 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, sale, derivative, mixture, or preparation of such plant, its seeds or resin – excluding "Hemp" as defined infra.

15. "Hemp" or "Industrial Hemp" means:

    (a) All nonseed parts and varieties of the Cannabis sativa L. plant, growing or not, that contain an average delta-9 tetrahydrocannabinol (THC) concentration that does not exceed three-tenths of one percent on a dry weight basis or the maximum concentration allowed under federal law, whichever is greater;
    (b) Any Cannabis sativa L. seed that is part of a growing crop, retained by a grower for future planting, or used for processing into or use as agricultural hemp seed;
    (c) Industrial hemp includes industrial hemp commodities and products and topical or ingestible animal and consumer products derived from industrial hemp with a delta-9 tetrahydrocannabinol concentration of not more than three-tenths of one percent on a dry weight basis.

16. "Intoxicating Cannabinoid(s)" means: any natural, semi-synthetic, or fully synthetic material, compound, mixture, or preparation, either present or not in the plant Cannabis sativa L, that can produce an intoxicating effect the

same as or similar to Tetrahydrocannabinol by binding to endocannabinoid receptors in human or animals, including:

(1) Marijuana, including Delta-9 THC;

(2) "Semi-synthetic Cannabinoids", meaning: a cannabinoid, including any derivative from such cannabinoid, that is derived from Hemp or Marijuana by any chemical or natural process – including, but not limited to, the following:
   a. THCA;
   b. THCA-C4;
   c. THCA-A;
   d. THCA-B;
   e. Delta-8 THC;
   f. Delta-10 THC;
   g. Delta-11 THC;
   h. OTHC;
   i. triOH-THC;
   j. THC-C4;
   k. THC-P;
   l. HHC;
   m. THC-JD;
   n. THC-X;
   o. THC-O; and
   p. HHC-P.

(3) "Synthetic Cannabinoids", meaning: any synthetic material, compound, mixture, or preparation that contains any quantity of a substance that is a cannabinoid receptor agonist, including but not limited to:
   a. Any substance listed in paragraph (ll) of subdivision 4 of subsection 2 of section 195.017 RSMo.;
   b. Any analogues; homologues; isomers, whether optical, positional, or geometric; esters; ethers; salts; salts of isomers, esters, and ethers, whenever the existence of the isomers, esters, ethers, or salts is possible within the specific chemical designation;
   c. THC-V;
   d. THC-B;
   e. THC-H; and
   f. THC-P.

17. "Cannabis," includes: Hemp, Marijuana, and Intoxicating Cannabinoids.

18. “Intoxicating Cannabinoid Product(s)” (“ICP”) means: a product that contains or that is labeled as containing an Intoxicating Cannabinoid and that is produced, marketed, or otherwise intended to be ingested orally, inhaled, or absorbed through the skin, including intermediate products intended for subsequent use as a component in a later finished ICP; and harvested Cannabis or Hemp and Cannabis or Hemp plant parts, otherwise known as Cannabis flower or Hemp flower.

19. “Hemp Product(s)” (HP) means: a product that contains or that is labeled as containing Hemp and that is produced, marketed, or otherwise intended to be ingested orally, inhaled, or absorbed through the skin, including intermediate products intended for subsequent use as a component in a later finished HP; and harvested Hemp and Hemp plant parts, otherwise known as Hemp flower that contain less the 0.3% delta-9 THC on a dry-weight basis.

20. “Cannabis Products”, includes; both ICPs and HPs.

21. “Ingredient(s)” means an article used as a component or constituent part of a Cannabis Product, including Intoxicating Cannabinoids and Hemp, irrespective of whether that article would be considered an “active ingredient” under Title 9, Chapter 21 of the United States Code. An ingredient may include, but is not limited to, a solvent, excipient, carrier, or coating.

22. “Supplier” means: a person or entity that: (A) sells Hemp or Intoxicating Cannabinoid Products to You; (B) Manufactures Intoxicating Cannabinoids or ICPs to be distributed and/or sold to You; or (C) contracts for the manufacture of Intoxicating Cannabinoids or ICPs, whether located inside or outside of this state, and that sells finished, packaged ICPs to You.

23. “Manufacture” means: to compound, blend, chemically alter, extract, infuse, cook, or otherwise make or prepare Intoxicating Cannabinoids or ICPs, including the processes of extraction, infusion, hydrogenation, isomerization, acetylation of Intoxicating Cannabinoids and packaging, repackaging, labeling, and relabeling of ICPs.

24. “Contaminants” include: heavy metals, pesticides, microbial contaminants, solvents, or other harmful foreign matter.

REQUESTS FOR INFORMATION (RFIs)

1. Identify every Cannabis Product You have manufactured, produced, marketed, distributed, advertised, and/or sold at any time from January 1, 2019 to the present.

2. For each Cannabis Product You identified in Your response to RFI #1, list every Ingredient and Identify the amount of each ingredient in milligrams.

3. For each Cannabis Product which You sell or have sold in Missouri that You identified in Your response to RFI #1, Identify the Supplier from whom You purchased each Cannabis Product. To the extent You purchased a particular Cannabis Product from more than one Supplier, Identify each Supplier from whom You purchased that Cannabis Product and when you purchased that Cannabis Product from each such manufacturer.

4. Identify whether each of the Cannabis Products identified in RFI #1 are either Intoxicating Cannabinoid Products or Hemp Products and describe why You have made this determination.

5. State whether you have independently tested the safety, health effects, level of Contaminants, or THC potency of any Cannabis Products you manufacture or sell, including any certificates of analysis (COAs). If so, identify specifically which cannabis Products you have independently tested and when You tested each such Cannabis Product.

6. For each Cannabis Product that You identified in Your response to RFI #1, state whether or not, to the best of your knowledge, each particular product:
    a. Has been approved by the FDA to treat any medical condition;
    b. Has been approved by the FDA to be marketed as a drug product, dietary supplement, or food additive;
    c. Has been included in any application submitted to the FDA under the application procedures provided in 21 U.S.C. § 355(a)–(b);
    d. Has been included in any application that was submitted to the FDA under the application procedures provided in 21 U.S.C. § 355(a)–(b) and was subsequently approved by the FDA; and
    e. Has been included in any application submitted to DHSS under the application procedures provided in § 196.105.1(2), RSMo.

7. For each Cannabis Product You identified in Your response to RFI #1, identify who Manufactured the Cannabis Product, and Identify whether, in Your opinion, it qualifies as an ICP or an HP, and what this supports determination.

8. For each Cannabis Product You identified in Your response to RFI #1, state whether the Cannabis Product contains added or isolated Intoxicating Cannabinoids and how much added or isolated Intoxicating Cannabinoid is included in the Cannabis Product.

9. For each Cannabis Product You identified in Your response to RFI #1, provide a full description of the methods used in, and the facility and safety controls used for, the manufacturing, processing, and packing of that Cannabis Product.

10. For each Cannabis Product that You identified in Your response to RFI #1, Identify each health or safety warning which you include on the packaging of the Cannabis Product provided to the Customer when purchasing the Cannabis Product.

11. For each and every Cannabis Product which you manufacture or sell in the State of Missouri, state which scientific studies, reports, or other authority (if any) You rely upon to support the safety, efficacy, or THC potency of the Cannabis Product.

12. Identify all Complaints you have received about any Cannabis Product you manufacture or sell. For each such Complaint, Identify the person who complained about the product, the date, the subject of the Complaint, and the resolution of the Complaint.

13. State whether you have a policy for tracking whether any of Your Customers experienced adverse health effects after using any of Your Cannabis Products. If you have such a policy, provide the policy, any Documents collected under that policy, and any Communications related to that policy or the implementation of that policy. This request includes both any presently-existing policy and any prior iterations of that policy or any other previously operative policy for tracking whether Your Customers experienced adverse health events after using any of Your Cannabis Products, and any Communications relating to such earlier policy or the implementation of that policy.

14. State whether you have a policy establishing how you determine the amount of Intoxicating Cannabinoids or Contaminants in Cannabis Products before you manufacture and sell the product in Missouri. If so, provide the policy, any Documents collected under that policy, and any Communications related to that policy or the implementation of that policy. This request includes both any presently-existing policy and any prior iterations of that policy or any other previously operative policy establishing how your previously determined the amount Intoxicating Cannabinoids or Contaminants in Cannabis Products

before you manufactured or sold them in Missouri, and any Communications relating to such earlier policy or the implementation of that policy.

15. Identify all persons responsible for providing Documents and information responsive to this Civil Investigative Demand. For each Person identified, Identify the specific requests to which each Person contributed Documents or information.

16. Describe Your corporate structure, including the names and contact information of all individuals and corporate entities with a financial interest in your business.

REQUESTS FOR PRODUCTION (RFPs)

1. Produce all documents in support of your response to RFI #2.

2. Produce all documents in support of your response to RFI #3.

3. Produce all documents in support of your response to RFI #4.

4. For each Cannabis Product You identified in Your response to RFI #5, provide all Documents and Communications discussing, referencing, or related to any independent testing You did.

5. For each Cannabis Product that You identified in Your response to RFI #1 and their respective ingredients, as identified in RFI #2, produce all Documents and Communications sent to, received by, or exchanged with you that support these determinations.

6. For each Cannabis Product that You identified in Your response to RFI #1, produce all Documents and Communications sent to, received by, or exchanged between You and any state or federal regulatory agency regarding the Cannabis Product. This request includes, but is not limited to, any Documents and Communications sent to, received by, or exchanged between You and either the FDA or DHSS.

7. Produce any Documents or Communications containing statements or representations You have made about purported safe consumption of Cannabis Products, purported health or wellness of consumption of Cannabis Products, or purported guidance on determining THC potency of a Cannabis Product.

8. Produce copies of all of the labeling included on or inside the containers of every Cannabis Product you sell in the State of Missouri, as well as copies of any

other information or material provided to Customers when they purchase any Cannabis Product you sell in Missouri.

9. Produce copies of any Documents or Communications containing, referencing, or including any advertisements, promotional information, or promotional materials for any Cannabis Product You have ever manufactured or sold in the State of Missouri since January 1, 2019.

10. To the extent not produced in Your responses to RFPs #7 - 9, *supra*, produce any Documents or Communications containing any representation that You have made about the safety, health effects, physical benefits, or mental benefits that may occur from the use or consumption of any Cannabis Product that You sell in Missouri. This Request includes, but is not limited to, any representations You have made about the benefits a Customer would experience from using any of Your Cannabis Products or any representations You have made of the risks of adverse consequences to a Customer's health from using one of your Cannabis Products manufactured or sold in Missouri.

11. For any Cannabis Product which You sell in Missouri and which You did not manufacture, produce all Documents and Communications sent to, received from, or exchanged between You and the Supplier of the Cannabis Product containing any statement or representation about each such Cannabis Product's ingredients, THC potency, health effects, and safety risks.

12. For any Cannabis Product which You manufacture in Missouri, produce all Documents and Communications sent to, received from, or exchanged between You and any Person or entity supplying any ingredient to the Cannabis Product regarding any statement or representation about the health effects or health risks of any such ingredient in the Cannabis Product.

13. Produce any Documents or Communications discussing, containing, or referencing any adverse health effects or side effects experienced by any Customer who purchased any Cannabis Product You Manufactured or sold in Missouri.

14. Produce any Documents or Communications in which any of Your employees or agents referred to the health risks or effects of any Cannabis Product as uncertain, unknown, or speculative.

15. For any Complaints identified in response to RFI #12, produce any Documents or Communications referencing, discussing, or related to the Complaint, or any investigation into, or resolution of, the Complaint.

16. To the extent not otherwise produced in response to any Request, produce any Documents or Communications (including, but not limited to, any internal emails, meeting minutes, notes, memoranda, or other internal communications) containing, referencing, or discussing any potential adverse health effects or health risks related to either the consumption of any Cannabis Product that You Manufacture or sell in Missouri, or the consumption of any product containing Intoxicating Cannabinoids or Hemp.

17. Produce all Documents that You identified, referred to, used to prepare, or that concern any of Your responses to any of these specific requests, to the extent that such Documents are not otherwise produced by any request contained herein directed to You.

18. If Documents or information responsive to a particular request have been lost or destroyed, state the circumstances under which the Documents or information were lost or destroyed, describe the lost or destroyed Documents or information to the fullest extent possible, state the specific demand to which they are responsive, and identify all Persons having knowledge of their content.

CATHERINE L. HANAWAY
ATTORNEY GENERAL

/s/ Connor H. McNeall
Connor H. McNeall, Mo. Bar. No. 76836
Assistant Attorney General
Missouri Attorney General's Office
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St. Louis, MO 63188
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IN THE MATTER OF: CID No. 25-100

Swin LLC d/b/a Swin Dispensaries November 24, 2025

CERTIFICATION OF COMPLIANCE

I certify that all documents and information required by Civil Investigative Demand No. 25-100, which is in the possession, custody, control, or knowledge of Swin LLC d/b/a Swin Dispensaries, has been submitted to the Missouri Attorney General as directed.

_____
Signature

_____
Printed Name

_____
Position

_____
Date

State of Missouri)
)
County of _____)

On this day, _____ personally appeared before me, a notary public in Missouri. I know him to be the individual who signed this document, and he acknowledged to me that he signed it for the purposes stated in it.

_____
Notary Public

_____
Date