SC Laboratories, Inc. 100 Pioneer St. Suite E Santa Cruz, CA 95060

October 30th, 2014

AHempWorld.com 17775 N. 66th Lane Glendale, AZ 85308

VIA ELECTRONIC MAIL ONLY

Dear Ted Burke,

This correspondence is in response to certain comments recently published in a report entitled "Hemp Oil Hustlers". It is our intent to clarify certain scientific inconsistencies claimed in this report.

On page 19 of "Hemp Oil Hustlers", there is a reference to test results allegedly confirmed by Flora Research Laboratories that show the presence of hexane, pentane, butane, and ethyl acetate in the RSHO Gold samples produced by CannaVest Inc. The article goes on to claim that "these are all class one solvents, the most dangerous and toxic class of solvents."

First, while it is true that class one solvents are considered the most dangerous class of solvents, it should be noted that none of the compounds listed above are considered by the United States Pharmacopia (USP) to be Class I. Hexane is considered a Class II solvent, while pentane, butane, and ethyl acetate are Class III, the least dangerous class of solvents. Secondly, the USP has set acceptable exposure limits for Class II and Class III compounds. Hexane has an exposure limit set at 290 parts per million (ppm), while all Class III solvents have a limit set at 5000 ppm.¹

Furthermore, there are critical flaws in the methodology employed by Flora Research Laboratories regarding these hemp oil samples. The headspace analysis employed on the hemp oil encountered critical analytical issues that would qualify as serious confounding factors in their analysis. There were major residue impurities on their injection needle that would lead to carryover between samples. Even more perplexing is the fact that in their attempt to wash out the nonpolar hemp oil out of their needle, they used triplicate runs of water, which would not dissolve the hemp oil matrix at all because of its poor solubility in such a polar solvent.²

In addition, because the solvents were identified via mass spectrometry, they were able to qualify, but not quantify the presence of these solvents. Indeed, there is no evidence to suggest that these residual solvents were present in amounts excess of what is mandated by the USP. In fact, since May of 2014 CannaVest has been testing each batch of their starting material for their hemp oil with SC Laboratories, where we use GC-FID with Headspace Analysis to quantify exact amounts of Class II and III residual solvents down to the ppm level. Nearly all of the

testing samples sent in have quantified the total residual solvents at levels below detection limits (10 ppm).

The quality control and safety testing of medical cannabis products in this industry is of utmost importance to us at SC Laboratories. It is important that claims regarding the presence of dangerous substances be substantiated with validated scientific data.

Sincerely,

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Andrew Pham, M.A., B.S. Lead Scientist SC Laboratories, Inc.

¹ http://www.usp.org/sites/default/files/usp_pdf/EN/USPNF/generalChapter467Current.pdf

² CBD Product Headspace Study, ©2014 Flora Research Laboratories