


SWORN STATEMENT UNDER PENALTY OF PERJURY BY DAVID R. STEWART

1. I, David R. Stewart, am the owner of Stewart Environmental Consultants, LLC. Stewart Environmental provides environmental services and laboratory testing and we have been in business for 29 years.
2. On May 8, 2014, Stewart Environmental received a 1-2 mL sample of RSHO Hemp Oil from Jason Cranford. The shipping container in which the sample arrived was intact. Stewart Environmental was not provided information regarding what was done with the sample from the time it was obtained from the manufacturer to the time when it was delivered to Stewart Environmental. Stewart Environmental has no knowledge of whether the sample, as delivered to Stewart Environmental, was in the same condition as when it was received from the manufacturer. Use or alteration of the sample prior to its delivery to Stewart Environmental could potentially impact test results. We were asked to test for volatile organic compounds, metals, and pesticides. There was insufficient volume to test for pesticides, so we had to eliminate that test. The volume of sample, about 1-2 mL was small for the remaining two analyses, but we went ahead with it. The analysis for volatile organic compounds is straight forward.
3. The analysis for metal is complicated in that the sample must first be oxidized with potassium permanganate and sulfuric acid, a process called "wet ashing." Subsequently the oxidized sample is treated with nitric and hydrochloric acid to solubilize any metals that may be present. In the oxidizing of the oils, a significant background of interference is created that must be accounted for. Without that correction, the sample will look like it is testing positive for some metals.
4. On May 22, 2014, in response for requests for preliminary test results, a preliminary report was issued. The May 22 Report was released before the necessary correction had been made, and before the Quality Assurance and Quality Control processes had been performed. The May 22 Report had very high readings for some metals: Lead at 26.6, Molybdenum at 8.85, Nickel at 1.24, Selenium at 63.9, Silver at 32.6. A copy of the May 22 Report is attached as Exhibit A.
5. On May 23, 2014, the lab manager notified Jason Cranford that the May 22 Report did not contain accurate metals results, due to the failure to perform the correction and to do the QA and QC processes. The lab manager emailed the corrected Report, which was dated May 23. The May 23 Report had these accurate metals readings: Lead at less than 2, Molybdenum at less than 1, Nickel at less than 0.5, Selenium at less than 2, Silver at less than 0.5. A copy of the May 23 Report is attached as Exhibit B.

I declare under penalty of perjury that the foregoing is true and correct. Executed February 10, 2015 at Fort Collins, Colorado.



David R. Stewart, Ph.D., PE