of CBD Meds and G2 Hemp, including the acts and practices alleged in the Complaint. His principal office or place of business is the same as that of CBD Meds and G2 Hemp.

2. Proposed Respondents neither admit nor deny any of the allegations in the Complaint, except as specifically stated in the Decision and Order. Only for purposes of this action, Proposed Respondents admit the facts necessary to establish jurisdiction.

3. Proposed Respondents waive:

a. Any further procedural steps;

b. The requirement that the Commission's Decision contain a statement of findings of fact and conclusions of law; and

c. All rights to seek judicial review or otherwise to challenge or contest the validity of the Decision and Order issued pursuant to this Consent Agreement.

4. This Consent Agreement will not become part of the public record of the proceeding unless and until it is accepted by the Commission. If the Commission accepts this Consent Agreement, it, together with the draft Complaint, will be placed on the public record for 30 days and information about them publicly released. Acceptance does not constitute final approval, but it serves as the basis for further actions leading to final disposition of the matter. Thereafter, the Commission may either withdraw its acceptance of this Consent Agreement and so notify each Proposed Respondent, in which event the Commission will take such action as it may consider appropriate, or issue and serve its Complaint (in such form as the circumstances may require) and decision in disposition of the proceeding, which may include an Order. *See* Section 2.34 of the Commission's Rules, 16 C.F.R. § 2.34 ("Rule 2.34").

5. If this agreement is accepted by the Commission, and if such acceptance is not subsequently withdrawn by the Commission pursuant to Rule 2.34, the Commission may, without further notice to Proposed Respondents: (1) issue its Complaint corresponding in form and substance with the attached draft Complaint and its Decision and Order; and (2) make information about them public. Proposed Respondents agree that service of the Order may be effected by its publication on the Commission's website (ftc.gov), at which time the Order will become final. *See* Rule 2.32(d). Proposed Respondents waive any rights they may have to any other manner of service. *See* Rule 4.4.

6. When final, the Decision and Order will have the same force and effect and may be altered, modified, or set aside in the same manner and within the same time provided by statute for other Commission orders.

7. The Complaint may be used in construing the terms of the Decision and Order. No agreement, understanding, representation, or interpretation not contained in the Decision and Order or in this Consent Agreement may be used to vary or contradict the terms of the Decision and Order.

8. Each Proposed Respondent agrees to comply with the terms of the proposed Decision and Order from the date that Proposed Respondent signs this Consent Agreement. Proposed Respondents understand that they may be liable for civil penalties and other relief for each violation of the Decision and Order after it becomes final.

CBD MEDS, INC.

By:_____
Lawrence Moses
CEO and Owner

Date:_____

G2 HEMP, INC.

By:_____
Lawrence Moses
CEO and Owner

Date:_____

LAWRENCE MOSES

By:_____
Lawrence Moses, individually and as an officer of CBD Meds, Inc. and G2 Hemp, Inc.

Date:_____

FEDERAL TRADE COMMISSION

By:_____
Barbara Chun
Attorney, Bureau of Consumer Protection

APPROVED:

_____
Maricela Segura
Regional Director
Western Region Los Angeles

_____
Andrew Smith
Director
Bureau of Consumer Protection

Date:_____

202 3080

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: **Joseph J. Simons, Chairman**
Noah Joshua Phillips
Rohit Chopra
Rebecca Kelly Slaughter
Christine S. Wilson

In the Matter of **CBD MEDS, INC., a corporation,** **G2 HEMP, INC., a corporation, and** **LAWRENCE MOSES, a/k/a LAWRENCE D. MOSES, JR.,** **individually and as an officer of** **CBD MEDS, INC. and G2 HEMP, INC.**	**DECISION AND ORDER** **DOCKET NO. C-**

DECISION

The Federal Trade Commission ("Commission") initiated an investigation of certain acts and practices of the Respondents named in the caption. The Commission's Bureau of Consumer Protection ("BCP")

consideration of public comments. The Commission duly considered any comments received from interested persons pursuant to Section 2.34 of its Rules, 16 C.F.R. § 2.34. Now, in further conformity with the procedure prescribed in Rule 2.34, the Commission issues its Complaint, makes the following Findings, and issues the following Order:

Findings

1. The Respondents are:

    a. Respondent CBD Meds, Inc., ("CBD Meds") is a California nonprofit mutual benefit corporation. Pursuant to California law, a nonprofit mutual benefit corporation is set up for the benefit of its members and may conduct business at a profit. Cal. Corp. Code §§ 7110 cmt., 7140(1). Thus, CBD Meds is organized to carry on business for its own profit or the profit of its members within the meaning of Section 4 of the FTC Act. 15 U.S.C. § 44. Its principal office or place of business is in Winchester, California 92596.

    b. Respondent G2 Hemp, Inc. ("G2 Hemp") is a California corporation. At times relevant to this Complaint, G2 Hemp operated a website that advertised and sold cannabidiol products. Its principal office or place of business is in Winchester, California 92596.

    c. Respondent Lawrence Moses, also known as Lawrence D. Moses, Jr., is the owner and CEO of CBD Meds and G2 Hemp. Individually or in concert with others, he controlled or had the authority to control, or participated in the acts and practices of CBD Meds and G2 Hemp, including the acts and practices alleged in the Complaint. His principal office or place of business is the same as that of CBD Meds and G2 Hemp.

2. The Commission has jurisdiction over the subject matter of this proceeding and over the Respondents, and the proceeding is in the public interest.

ORDER

Definitions

For purposes of this Order, the following definitions apply:

A. "**CBD Product**" means any Dietary Supplement, Food, or Drug containing cannabidiol.

B. "**Covered Product**" means any Dietary Supplement, Food, or Drug, including but not limited to CBD Products.

C. "**Dietary Supplement**" means: (1) any product labeled as a dietary supplement or otherwise represented as a dietary supplement; or (2) any pill, tablet, capsule, powder,

Provisions

I. Prohibited Representations: Regarding Health-Related Claims Requiring Human Clinical Testing For Substantiation

IT IS ORDERED that Respondents, Respondents' officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of any Covered Product, must not make, or assist others in making, expressly or by implication, any representation that such product:

A. treats blood pressure conditions or gastrointestinal disorders; reduces seizures and convulsions; or reduces blood sugar levels; or

B. cures, mitigates, or treats any disease, including but not limited to cancer, age-related bone disease, arthritis, diabetes, glaucoma, strokes, Alzheimer's disease, multiple sclerosis, Parkinson's disease, epilepsy, autism, post traumatic stress disorder, bipolar disorders, schizophrenia, psoriasis, or HIV dementia,

unless the representation is non-misleading, and, at the time of making such representation, they possess and rely upon competent and reliable scientific evidence substantiating that the representation is true. For purposes of this Section, competent and reliable scientific evidence must consist of human clinical testing of the Covered Product, or of an Essentially Equivalent Product, that is sufficient in quality and quantity based on standards generally accepted by experts in the relevant disease, condition, or function to which the representation relates, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that the representation is true. Such testing must be: (1) randomized, double-blind, and placebo-controlled; and (2) conducted by researchers qualified by training and experience to conduct such testing. In addition, all underlying or supporting data and documents generally accepted by experts in the field as relevant to an assessment of such testing as described in the Section entitled Preservation of Records Relating to Competent and Reliable Human Clinical Tests or Studies must be available for inspection and production to the Commission. Persons covered by this Section have the burden of proving that a product satisfies the definition of Essentially Equivalent Product.

II. Prohibited Representations: Other Health-Related Claims

IT IS FURTHER ORDERED that Respondents, Respondents' officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with the manufacturing, labeling, advertising, promotion, offering for sale, sale, or distribution of any Covered Product, must not make, or assist others in making, expressl

e(t)-2hc(t)-2 (not pu)-10 (c)4v(, a)4 (42 .15 Td[(

convulsions, cancer, age-related bone disease, arthritis, blood pressure conditions, diabetes, gastrointestinal disorders, glaucoma, Alzheimer's disease, multiple sclerosis, Parkinson's disease, epilepsy, autism, post traumatic stress disorder, bipolar disorders, or schizophrenia, unless the representation is non-misleading, and, at the time of making such representation, they possess and rely upon competent and reliable scientific evidence that is sufficient in quality and quantity based on standards generally accepted by experts in the relevant disease, condition, or function to which the representation relates, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that the representation is true.

For purposes of this Section, competent and reliable scientific evidence means tests, analyses, research, or studies (1) that have been conducted and evaluated in an objective manner by experts in the relevant disease, condition, or function to which the representation relates; (2) that are generally accepted by such experts to yield accurate and reliable results; and (3) that are randomized, double-blind, and placebo-controlled human clinical testing of the Covered Product, or of an Essentially Equivalent Product, when such experts would generally require such human clinical testing to substantiate that the representation is true. In addition, when such tests or studies are human clinical tests or studies, all underlying or supporting data and documents generally accepted by experts in the field as relevant to an assessment of such testing as set forth in the Section entitled Preservation of Records Relating to Competent and Reliable Human Clinical Tests or Studies must be available for inspection and production to the Commission. Persons covered by this Section have the burden of proving that a product satisfies the definition of Essentially Equivalent Product.

III. Preservation of Records Relating to Competent and Reliable

D.

D. that a U.S. government laboratory study showed that any Covered Product may make chemotherapy more effective and increase cancer cell death without harming normal cells; or

E. that the U.S. government has stated that any Covered Product is scientifically proven to have antioxidant and neuroprotectant properties, limit neurological damage following ischemic insults, such as stroke and trauma, and treat neurogenerative diseases, such as Alzheimer's disease, Parkinson's disease and HIV dementia.

V. FDA Approved Claims

IT IS FURTHER ORDERED that nothing in this Order prohibits Respondents, Respondents' officers, agents, employees, and attorneys, or all other persons in active concert or participation with any of them, from:

A. for any Drug, making a representation that is approved in labeling for such Drug under any tentative final or final monograph promulgated by the Food and Drug Administration ("FDA"), or under any new drug application approved by the FDA; and

B. for any product, making a representation that is specifically authorized for use in labeling for such product by regulations promulgated by the FDA pursuant to the Nutrition Labeling and Education Act of 1990 or permitted under Sections 303-304 of the Food and Drug Administration Modernization Act of 1997.

VI. Notices to Customers

IT IS FURTHER ORDERED that Respondents must notify customers as follows:

A. Respondents must identify all consumers who purchased the CBD Products on or after January 9, 2017 and through the Order's effective date ("eligible customers").

    1. Such eligible customers, and their contact information, must be identified to the extent such information is in Respondents' possession, custody or control;

    2. Eligible customers include those identified at any time including after Respondents'

2. Additionally, the Individual Respondent must submit notice of any change in: (a) name, including alias or fictitious name, or residence address; or (b) title or role in any business activity, including (i) any business for which such Respondent performs services whether as an employee or otherwise and (ii) any entity in which such Respondent has any ownership interest and over which Respondents have direct or indirect control. For each such business activity, also identify its name, physical address, and any Internet address.

C. Each Respondent must submit notice of the filing of any bankruptcy petition, insolvency

ATTACHMENT A TO THE ORDER

Lawrence Moses
CEO, CBD Meds, Inc. and G2 Hemp, Inc.

ATTACHMENT