

## Interview With Mike Clemmons Regarding Authenticity of THCA Lab Reports

*This interview was conducted by CBD Oracle via email in October 2023 and is provided here for full transparency. Learn more about [CBD Oracle's Editorial Policy](#).*

### **About Mike Clemmons:**

Mike Clemmons is a lab manager at Marin Analytics.

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**CBD Oracle:** *In my research I've come across a Cookies COA for a test they claim was performed by you, but a Google search reveals that the lab report is identical to another one you performed for Elevated Trading.*

Cookies: [https://thca.cookies.co/wp-content/uploads/2023/06/Dosido-THCa-Hemp\\_.pdf](https://thca.cookies.co/wp-content/uploads/2023/06/Dosido-THCa-Hemp_.pdf)

Original:

[https://elevatedtrading.com/wp-content/uploads/2023/04/Elevated-2023-COA-THCA-Exotic-Lemon-Tre\\_e.pdf](https://elevatedtrading.com/wp-content/uploads/2023/04/Elevated-2023-COA-THCA-Exotic-Lemon-Tre_e.pdf). *I was wondering if you could confirm which of these is an authentic COA?*

**Mike Clemmons:** Thanks for reaching out to us at Marin Analytics. What I can say about both COA's is that the sample ID's match both the chromatograms and cannabinoid profiles. They do indeed coincide with a test we performed on a flower with that customer Batch # on 4/5/2023.

"White-labeling", or changing the customer name on the COA's is not uncommon in the space as often a customer of the lab will move the product to a retailer or another distributor and it seems retesting the same product a week later is redundant.

Also, in the more than 20 years I've been involved in the cannabis industry, renaming strains for a myriad of reasons has been prevalent in the industry. Some rename strains to add something 'unique' to their board or to fill an inventory gap, and others to cash in on strains that are more culturally relevant.

In this case, I can't say that either COA is "fraudulent" as both sample ids and chromatograms coincide with the flower we tested, and would like to think coincide with the flower being presented by these retailers.

If someone called me to validate the COA, I would ask for the sample ID and in this case would say that the sample ID provided was for a flower tested on 4/05/2023 with a customer batch

number of 4-1-JFG-RM1A, and had the following cannabinoid profile. Because of these intricacies of this industry, I don't divulge my customer name for not wanting to inadvertently disintermediate anyone's supply chain, nor do I bring up the strain name as those are far from absolute.

This does of course demonstrate how a lack of regulatory oversight and weak custody chains in the recreational hemp industry leaves a lot of loopholes which could be exploited by bad actors.

If I were to send a message to retailers or distributors, I would recommend taking a 'trust-but-verify' approach to their acquisition strategy. It seems that the nominal fees for retesting product are pretty small when weighed against putting oneself in legal peril by inadvertently selling non-compliant "marijuana" as hemp flower.

I hope that's helpful. If you have any other questions, please feel free to reach out anytime.

**CBD Oracle:** *Later in my research I found a worse example. Here is a [COA provided by Cookies](#). You can see discrepancies if you compare the THCA values in the graph vs. the table and total cannabinoids vs. the value on the left. I found [what may be the original](#) and it seems to confirm the change. Certainly there are problems because the total cannabinoids math on the Cookies one does not check out. Would this be an example of a doctored COA? Perhaps fraudulent is a strong word but I think this undermines the work you do and takes advantage of customers attempting to do their "due diligence" before purchasing.*

**Mike Clemmons:** I do find that example (below) a bit peculiar as it was definitely modified outside of our organization, but not in a way that was material to the actual result. It looks like someone put the number for total cannabinoids under the THCA bar in the graph, but left the numbers in the table unedited, which I imagine people would more likely depend on to be informed about the composition of the flower.

The chromatogram and the sample ID do correlate to each other, and to a test we performed on a flower on 3/16/2023. The results depicted in the table of both reports are consistent with the the result we got from that particular sample.

In most cases, a bad actor would modify a report to either reflect a  $\Delta 9$ -THC level below the action limit on a sample that may not have passed, or "boost" the THCA levels on a sample that tested lower than ideal. I don't see either in this case.

I agree that modifying a COA, especially for the above stated reasons undermines the labs, and has the potential of eroding consumer confidence in lab reports. However, I also feel like retailers posting the lab report is less about informing the consumer and more about

demonstrating to authorities that the product in question is compliant to this interpretation of the 2018 Farm bill.

What might be an interesting exercise is to order a product or 2 and retest them to see if the chromatograms match, or determine if the COA from one test is being "recycled" in order to place otherwise non-compliant material into retailers. If this is of interest, I would be happy to donate a couple tests to the cause.

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