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Attorneys for Petitioner
Federal Trade Commission

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Case No. _____

Federal Trade Commission,

Petitioner,

v.

Kushly, LLC,
a limited liability company,

Respondent.

**PETITION TO ENFORCE
CIVIL INVESTIGATIVE
DEMAND**

1. Petitioner Federal Trade Commission (FTC or Commission) brings this action to enforce a civil investigative demand (CID) issued to Respondent Kushly, LLC, pursuant to Section 20 of the FTC Act, 15 U.S.C. § 57b-1.

1 product or service intended to provide a health benefit or
2 to affect the structure or function of the body; have
3 misrepresented or are misrepresenting the safety or
4 efficacy of such products or services; or otherwise have
5 engaged or are engaging in unfair or deceptive acts or
6 practices or in the making of false advertisements, in or
affecting commerce, in violation of Sections 5 or 12 of
the Federal Trade Commission Act, 15 U.S.C. §§ 45 and
52, as amended. The investigation is also to determine
whether Commission action to obtain monetary relief
would be in the public interest.

7 Resolution, File No. 002 3191. Pet. Exh. 2; Pet. Exh. 1 at ¶ 5.

8 9. Kushly markets cannabidiol (CBD) products online, including through
9 its website at www.kushly.com, and has made certain claims concerning the
10 purported health benefits or efficacy of its products.

11 10. On May 6, 2020, under the authority of the Resolution, the FTC
12 issued a CID to Kushly requiring it to produce documents and respond to
13 interrogatories by June 5, 2020. Pet. Exh. 3 at 3; Pet. Exh. 1 at ¶ 9.

14 11. The FTC served the CID on Kushly on May 11, 2020, by delivering it
15 by courier to Kushly's registered agent, Sam Conley, at the address provided in
16 Kushly's filings with the Arizona Corporation Commission, a residential address in
17 Paradise Valley, Arizona. Pet. Exh. 4 and Pet. Exh. 5; *see also* Pet. Exh. 1 at ¶ 10.

18 12. To date, Kushly has not provided the materials or information
19 requested by the CID. Pet. Exh. 1 at ¶ 29.

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Attorneys for Petitioner
Federal Trade Commission

**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

**RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC
INVESTIGATION OF DIETARY SUPPLEMENTS, FOODS, DRUGS, DEVICES, OR
ANY OTHER PRODUCT OR SERVICE INTENDED TO PROVIDE A HEALTH
BENEFIT OR TO AFFECT THE STRUCTURE OR FUNCTION OF THE BODY**

File No. 002 3191

Nature and Scope of Investigation:

To investigate whether unnamed persons, partnerships, or corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of dietary supplements, foods, drugs, devices, or any other product or service intended to provide a health benefit or to affect the structure or function of the body; have misrepresented or are misrepresenting the safety or efficacy of such products or services; or otherwise have engaged or are engaging in unfair or deceptive acts or practices or in the making of false advertisements, in or affecting commerce, in violation of Sections 5 or 12 of the Federal Trade Commission Act, 15 U.S.C. §§ 45 and 52, as amended. The investigation is also to determine whether Commission action to obtain monetary relief would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed ten (10) years from the date of issuance of this resolution. The expiration of this ten-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the ten-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the ten-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

**APRIL
TABOR** Digitally signed
by APRIL TABOR
Date: 2019.08.12
12:09:40 -04'00'

April J. Tabor
Acting Secretary

Issued: August 9, 2019



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Office of the Secretary

May 6, 2020

Via Federal Express

Kushly, LLC
c/o Sam Conley
9148 North 66th Place
Paradise Valley, Arizona 85253

FTC Matter No. 2023111

Dear Sir or Madam:

The Federal Trade Commission (“FTC”) has issued the attached Civil Investigative Demand (“CID”) asking for information as part of a non-public investigation. Our purpose is to determine whether the Company, as defined herein, or affiliated Persons have made deceptive, false, or unsubstantiated representations about the health-related benefits of products containing cannabidiol (“CBD Products”), in violation of Sections 5 and 12 of the FTC Act, 15 U.S.C. §§ 45 and 52, and whether Commission action to obtain monetary relief would be in the public interest. Please read the attached documents carefully. Here are a few important points we would like to highlight:

1. **Contact FTC counsel, Reid Tepfer (214-979-9395; rtepfer@ftc.gov), as soon as possible to schedule a telephone call to be held within 14 days.** During that telephone call, FTC counsel can address any questions or concerns you have regarding this CID, including whether there are changes to how you comply with the CID that would reduce your cost or burden while still giving the FTC the information it needs. Please read the attached documents for more information about that meeting.
2. **You must immediately stop any routine procedures for electronic or paper document destruction, and you must preserve all paper or electronic documents** that are in any way relevant to this investigation, even if you believe the documents are protected from discovery by privilege or some other reason.
3. **The FTC will use information you provide in response to the CID for the purpose of investigating violations of the laws the FTC enforces.** We will not disclose the information under the Freedom of Information Act, 5 U.S.C. § 552. We may disclose the information in response to a valid request from Congress, or other civil or criminal federal, state, local, or foreign law enforcement agencies for their official law enforcement purposes. The FTC or other agencies may use and disclose your response in any federal, state, or foreign civil or criminal proceeding, or if

required to do so by law. However, we will not publicly disclose your information without giving you prior notice.

4. **Please read the attached documents closely.** They contain important information about how you should provide your response.

Please contact FTC counsel as soon as possible to set up an initial meeting. We appreciate your cooperation.

Very truly yours,



April J. Tabor
Acting Secretary of the Commission



CIVIL INVESTIGATIVE DEMAND

1. TO

Kushly, LLC
c/o Sam Conley
9148 North 66th Place
Paradise Valley, Arizona 85253

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

2. ACTION REQUIRED

You are required to appear and testify.

LOCATION OF HEARING

YOUR APPEARANCE WILL BE BEFORE

DATE AND TIME OF HEARING OR DEPOSITION

You are required to produce all documents described in the attached schedule that are in your possession, custody, or control, and to make them available at your address indicated above for inspection and copying or reproduction at the date and time specified below.

You are required to answer the interrogatories or provide the written report described on the attached schedule. Answer each interrogatory or report separately and fully in writing. Submit your answers or report to the Records Custodian named in Item 4 on or before the date specified below.

DATE AND TIME THE DOCUMENTS MUST BE AVAILABLE

June 5, 2020 by 5:00 pm

3. SUBJECT OF INVESTIGATION

See attached schedule and attached resolution.

4. RECORDS CUSTODIAN/DEPUTY RECORDS CUSTODIAN

James E. Elliott/Brent McPeek
Federal Trade Commission
1999 Bryan Street, Suite 2150
Dallas, Texas 75201

5. COMMISSION COUNSEL

Reid Tepfer
Federal Trade Commission
1999 Bryan Street, Suite 2150
Dallas, Texas 75201
(214) 979-9395

DATE ISSUED

May 6, 2020

COMMISSIONER'S SIGNATURE

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documents or the submission of answers and report in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances of such production or responsible for answering each interrogatory or report question. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

TRAVEL EXPENSES

Use the enclosed travel voucher to claim compensation to which you are entitled as a witness for the Commission. The completed travel voucher and this demand should be presented to Commission Counsel for payment. If you are permanently or temporarily living somewhere other than the address on this demand and it would require excessive travel for you to appear, you must get prior approval from Commission Counsel.

A copy of the Commission's Rules of Practice is available online at <http://bit.ly/FTCRulesofPractice>. Paper copies are available upon request.

Form of Certificate of Compliance*

I/We do certify that all of the documents and information required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this Civil Investigative Demand has not been submitted, the objections to its submission and the reasons for the objection have been stated.

If an interrogatory or a portion of the request has not been fully answered or a portion of the report has not been completed, the objections to such interrogatory or uncompleted portion and the reasons for the objections have been stated.

Signature _____

Title _____

Sworn to before me this day

Notary Public

*In the event that more than one person is responsible for complying with this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

**FEDERAL TRADE COMMISSION (“FTC”)
CIVIL INVESTIGATIVE DEMAND (“CID”) SCHEDULE
FTC File No. 2023111**

Meet and Confer: You must contact **FTC counsel, Reid Tepfer (214-979-9395; rtepfer@ftc.gov)**, as soon as possible to schedule a meeting (telephonic or in Person) to be held within fourteen (14) days after You receive this CID. At the meeting, You must discuss with FTC counsel any questions You have regarding this CID or any possible CID modifications that could reduce Your cost, burden, or response time yet still provide the FTC with the information it needs to pursue its investigation. The meeting also will address how to assert any claims of protected status (e.g., privilege, work-product, etc.) and the production of electronically stored information. You must make available at the meeting personnel knowledgeable about Your information or records management systems, Your systems for electronically stored information, custodians likely to have information responsive to this CID, and any other issues relevant to compliance with this CID.

Document Retention: You must retain all documentary materials used in preparing responses to this CID. The FTC may require the submission of additional Documents later during this investigation. **Accordingly, You must suspend any routine procedures for Document destruction and take other measures to prevent the destruction of Documents in Your possession, custody, or control** that are in any way relevant to this investigation, even if those Documents are being retained by a third-party or You believe those Documents are protected from discovery. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

Sharing of Information: The FTC will use information You provide in response to the CID for the purpose of investigating violations of the laws the FTC enforces. We will not disclose such information under the Freedom of Information Act, 5 U.S.C. § 552. We also will not disclose such information, except as allowed under the FTC Act (15 U.S.C. § 57b-2), the Commission’s Rules of Practice (16 C.F.R. §§ 4.10 & 4.11), or if required by a legal obligation. Under the FTC Act, we may provide Your information in response to a request from Congress or a proper request from another law enforcement agency. However, we will not publicly disclose such information without giving You prior notice.

Manner of Production: Contact **James E. Elliott (214-979-9373; jelliott@ftc.gov)** by email or telephone at least five days before the return date for instructions on how to produce information responsive to this CID.

Certification of Compliance: You or any Person with knowledge of the facts and circumstances relating to the responses to this CID must certify that such responses are complete by signing the “Certification of Compliance” attached to this CID.

Definitions and Instructions: Please review carefully the Definitions and Instructions that appear after the Specifications and provide important information regarding compliance with this CID.

I. SUBJECT OF INVESTIGATION

Whether the Company, as defined herein, or affiliated Persons have made deceptive, false, or unsubstantiated representations about the health-related benefits of products containing cannabidiol (“CBD Products”), in violation of Sections 5 and 12 of the FTC Act, 15 U.S.C. §§ 45 and 52, and whether Commission action to obtain monetary relief would be in the public interest. See also attached resolution.

II. SPECIFICATIONS

Applicable Time Period: Unless otherwise directed, the applicable time period for the requests set forth below is from **February 1, 2018, until the date of full and complete compliance with this CID.**

A. **Interrogatory Specifications:** Demand is made for the following information:

1. State the Company’s full legal name, principal address, telephone number, the date and state of incorporation or licensing, and, without regard to the Applicable Time Period, all other names under which the Company has done business.
2. Identify all officers, directors, members, principals, and owners of the Company, and all shareholders with five percent or more ownership of the Company, and state each shareholder’s percentage of ownership at any time since the Company was formed.
3. State the names, addresses, officers, directors, owners, and states of incorporation of all of the Company’s wholly owned or partially owned subsidiaries, parent companies, unincorporated divisions, joint ventures, partnerships, operations under assumed names, Affiliates, and predecessor companies, and describe the relationship of each to the Company.
4. State the Company’s organizational structure, including the name and primary function of all departments, divisions, branches, entities, lines of business, brands, or other parts of the Company, and Identify the Person(s) that head each department, division, branch, entity, or other part of the Company.
5. Identify each reseller, distributor, Affiliate, or other Person responsible for reselling or distributing any CBD Products. For each such entity, state the following:
 - a. the manner of sale or distribution;
 - b. the names of URLs of any websites through which it Advertises or sells any CBD Products;
 - c. its total gross sales of CBD Products by year; and
 - d. the manner in which it is compensated for sales of any CBD Products.

6. With regard to any Affiliate Program You operate in connection with a CBD Product:
 - a. describe the program in detail;
 - b. Identify each Person with responsibility for developing, implementing, reviewing, evaluating, managing, or approving the program, and describe the functions performed by each Person and the corresponding duration of each Person's performance;
 - c. Identify all Affiliates; and
 - d. Identify all Affiliates disciplined or removed from the program due to the Affiliate's failure to comply with Your policies, practices, and procedures, and state each reason for such action.
7. State all Internet sites, including all websites, blogs, vlogs, Instagram profiles, Twitter profiles, Facebook profiles, other social media platforms, and YouTube or other video channels, owned, operated, or controlled by the Company or any other Person working for or on Your behalf, that has described, discussed, promoted, Advertised, or offered CBD Products for sale. Also state all hashtags created or used by You or any other Person working for or on Your behalf.
8. For each materially different version of any websites or social media pages responsive to Document Specification 1, state the beginning and ending dates of dissemination or use.
9. For each Advertisement responsive to Document Specification 2, state, preferably in an Excel spreadsheet: (a) how and where it was disseminated, (b) the beginning and ending dates of dissemination, and (c) the total number of disseminations.
10. For each Advertisement responsive to Document Specification 2, Identify: (a) the individual(s) with primary responsibility for developing or creating the Advertisement's content; and (b) the individual(s) with ultimate responsibility for approving the Advertisement prior to dissemination.
11. For websites and other Advertisements produced in response to Document Specifications 1 and 2, state the following information for each Person, if any, who provided an endorsement or testimonial for the product:
 - a. full name, mailing address, telephone number, and email address;
 - b. whether the Person's endorsement or testimonial was edited by the Company, how it was changed, and what name, if any, it was published under;
 - c. the process, if any, the Company used to confirm whether the Person achieved the reported results;

- d. whether the Person was compensated, financially or otherwise, for providing the endorsement or testimonial and the amount and type of compensation; and
 - e. the Person's relationship, if any, to the Company or any Company officer, director, shareholder, or employee.
12. State the keywords, terms, phrases, or other criteria that You have used to effect the placement or delivery of any Advertisement or sponsored link in connection with any online Advertising network or Advertising delivery or contextual marketing software or system, including any Advertisement or sponsored link in search results generated by Google or any other search service.
13. For each CBD Product You have marketed, offered for sale, or sold, state:
 - a. all ingredients contained therein, including the dosage of each ingredient in each serving. If the product formulation has changed at any time, state all ingredients of each formulation, including the dosage of each ingredient in each serving, and state the date range that each formulation was offered for sale;
 - b. the source of the cannabidiol;
 - c. the per unit sales price of the product;
 - d. the number of units sold;
 - e. total gross revenues attributable to the product; and
 - f. total refunds, credits, or chargebacks attributable to the product.

If You maintain financial data on a fiscal schedule that differs from the calendar year schedule, provide these data according to those fiscal years and state the dates of the fiscal year.
14. Without regard to the Applicable Time Period, describe any human clinical studies testing the efficacy of any of Your CBD Products.
15. Without regard to the Applicable Time Period, Identify:
 - a. each Person involved in researching, developing, reviewing, testing, evaluating, or approving any of Your CBD Products;
 - b. each Person involved in researching, developing, reviewing, or evaluating substantiation, scientific or otherwise, for health-related claims on Your websites and any in other Advertising, including the express or implied claims set forth in Document Specification 11; and

- c. all other experts consulted by the Company or on the Company's behalf, or upon whose advice, opinion, or expertise the Company relied on to substantiate or refute the express or implied claims set forth in Document Specification 11.
 - d. Describe the functions performed by each Person and expert with their corresponding durations (*i.e.*, from month/year to month/year).
 16. Describe any business relationship, contract, collaborative arrangement, or other connection between the Company and any university, medical school, hospital, research facility, physician, or medical researcher related to CBD Products.
 17. Identify, and state the job title and job responsibilities of, all Persons who provided Documents and information in response to each of the specifications of this Civil Investigative Demand.
 18. Identify all financial institutions, platforms, or other entities that performed Payment Processing for You or on Your behalf during the Applicable Time Period.
 19. Identify each parent, subsidiary, and other affiliate that forms part of the Company; describe in detail the relationship between the Company and each entity, including whether there are or were any known directors or principals in common; and describe any agreement(s) between the Company and each parent, subsidiary or affiliate (e.g., assignment of assets, service agreements, license agreements) relating to the marketing or sale of CBD Products.
 20. To the extent not already answered in response to Interrogatory 20, describe the Company's relationship with the following entities with regard to the marketing or sale of CBD Products, and state whether the entity has any officers or directors in common with the Company:
 - a. Kushly Industries, LLC
 - b. AZ Kushly Holdings, LLC
 21. Describe in detail Cody Alt's position, role, and responsibilities: (a) the Company; (b) Kushly Industries, LLC; (c) AZ Kushly Holdings, LLC.
 22. Describe in detail Robert Khoshaba's position, role, and responsibilities: (a) the Company; (b) Kushly Industries, LLC; (c) AZ Kushly Holdings, LLC.
- B. Document Specifications:** Demand is made for the following Documents:
1. A complete copy of every materially different version of the **kushly.com** website and any other website You own, operate, or control that promotes the sale of CBD Products.

2. Unless produced in response to Document Specification 1, a copy of each different Advertisement for CBD Products marketed by You or Your Affiliates, including but not limited to web pages (including metatags used for the purpose of search engine optimization or otherwise directing web traffic), social media, sponsored content, word-of-mouth campaigns, promotional materials, magazine and newspaper Ads, television and radio Ads, outdoor Ads, in-store displays, and direct mail campaigns, that have been disseminated to consumers, distributors or potential distributors, Affiliates or potential Affiliates, influencers or potential influencers, retailers, or any other Person, or that have been prepared for future dissemination or use.
3. All contracts and other agreements, including modifications thereto, with Your Affiliates who promote the sale of CBD Products.
4. All contracts and other agreements, including modifications thereto, with Cody Alt.
5. All contracts and other agreements, including modifications thereto, with Robert Khoshaba.
6. One copy of each organizational chart, personnel directory, and corporate diagram in effect at the Company at any time during the Applicable Time Period, including but not limited to charts, directories, and diagrams that show the Company's relationship with (a) Kushly Industries, LLC and (b) AZ Kushly Holdings, LLC.
7. All agreements between the Company and (a) Kushly Industries, LLC or (b) AZ Kushly Holdings, LLC, individually or collectively, concerning the marketing or sale of CBD Products.
8. For each endorser or testimonialist identified in response to Interrogatory Specification 11, Documents relating to communications between the Company and the endorser, including any agreements, contracts, or compensation (including reimbursement for travel and related expenses).
9. All Documents used in preparation for or during communications with any consumer, including scripts, outlines, guides, suggested responses to questions, policies, manuals, or procedures for handling consumer inquiries, requests, or complaints related to CBD Products.
10. Without regard to the Applicable Time Period, communications with any Person responsible for developing, reviewing, or evaluating substantiation, scientific or otherwise, or upon whose advice, opinion, or expertise the Company or any Ad agency acting on behalf of the Company relied to substantiate or refute the claims listed in Document Specification 11.
11. Regardless of whether the Company believes these claims were made in Advertising or promotional materials, and without regard to the Applicable Time

Period, all Documents, including studies, tests, experiments, demonstrations, and written or oral statements or opinions, whether or not completed or published, substantiating each of the following claims:

- a. Kushly Topical CBD Ointment may ease sore joints;
- b. Kushly Topical CBD Ointment may help muscles heal fast;
- c. Kushly CBD may help treat chronic pain;
- d. Kushly CBD may improve sleep and help treat sleep disorders, including insomnia and narcolepsy;
- e. Kushly CBD may help treat headaches;
- f. Kushly CBD may help treat psychiatric disorders, including depression, bipolar disorder, anxiety, post-traumatic stress disorder, and anorexia nervosa;
- g. Kushly CBD may help treat cancer;
- h. Kushly CBD may help treat multiple sclerosis;
- i. Kushly CBD may help lower blood pressure;
- j. Kushly CBD may help treat addiction;
- k. Kushly CBD may help treat chronic drowsiness;
- l. Kushly CBD may boost your energy levels;
- m. Kushly CBD may help treat Parkinson's disease;
- n. Kushly CBD may help treat chronic tremors;
- o. Kushly CBD may help treat psychosis;
- p. Kushly CBD may enhance your mood;
- q. Kushly CBD may boost your cognition, improve your memory, and enhance your creativity;
- r. Kushly CBD may help treat Alzheimer's Disease;
- s. Kushly CBD may enhance stamina;
- t. Kushly CBD may help treat epilepsy;
- u. Kushly CBD may stimulate appetite;

- v. Kushly CBD may help regulate oily skin or hydrate your skin;
 - w. Kushly CBD may help heal bruises, rashes, or wounds or treat skin infections;
 - x. Kushly CBD may help treat acne, psoriasis, and eczema;
 - y. Kushly CBD may help treat arthritis;
 - z. Kushly CBD may help treat muscle spasms;
 - aa. Kushly CBD may help treat tendonitis;
 - bb. Kushly CBD may help reduce wrinkles or improve skin elasticity;
 - cc. Kushly CBD may help treat PMS-related anxiety and depression;
 - dd. Kushly CBD may help treat pain resulting from Endometriosis;
 - ee. Kushly CBD may help treat nausea; and
 - ff. Kushly CBD may help treat dysmenorrhea.
12. All Documents, without regard to the Applicable Time Period, relating to any study conducted or sponsored by the Company, or the supplier of any active ingredients in Your CBD Products, examining the effectiveness of such product, or any active ingredient in such product, for the claims listed in Document Specification 11 above, whether or not the study was completed or published, including, but not limited to:
- a. all reports, articles, write-ups, or other accounts of the results of the study, and drafts of such Documents reviewed by the study sponsor or any other Person not employed by the research entity;
 - b. all final protocols and amendments to such protocols;
 - c. all Documents relating to recruitment; randomization; instructions, including oral instructions, to participants; and subject compliance;
 - d. all raw data collected from participants enrolled in the study, including any participants who did not complete the study; source Documents for such data; data dictionaries; and case report forms;
 - e. Documents sufficient to Identify all study participants, including any participants who did not complete the study, and all communications with any participants relating to the study;

- f. all Documents relating to any statistical analysis of any study data, including, but not limited to, any pretest analysis, intent-to-treat analysis, or between-group analysis performed on any study data;
 - g. all Documents relating to attempts to publish articles or other publications based on the data from the study; and
 - h. all Documents relating to the sponsorship of the study, including all contracts and communications between any sponsor and the study's researchers.
13. Without regard to the Applicable Time Period, Documents relating to any communication between the Company or any Affiliate and any federal, state, or local governmental authority, including the Food and Drug Administration, concerning the efficacy of, or advertising for, any CBD Product.
14. Financial statements or other Documents sufficient to show the Company's total revenues and expenses for each year or fiscal year during the Applicable Time Period.
15. Documents sufficient to show the identity, purity, strength, and composition of Your CBD Products.

III. DEFINITIONS

The following definitions apply to this CID:

D-1. **“Advertisement”** or **“Advertising”** or **“Ad”** means any written or verbal statement, illustration, or depiction that promotes the sale of a good or service or is designed to increase consumer interest in a brand, good, or service. Advertising media includes, but is not limited to: packaging and labeling; promotional materials; print; television; radio; and Internet, social media, and other digital content.

D-2. **“Affiliate”** means any Person, including any third-party marketer, who participates in an Affiliate Program.

D-3. **“Affiliate Network”** means any Person who provides another Person with Affiliates for an Affiliate Program or with whom any Person contracts as an Affiliate to promote any product, service, or program.

D-4. **“Affiliate Program”** means any arrangement under which a Person pays, or offers to pay, or provides, or offers to provide, any form of consideration to any third party, either directly or through an Affiliate Network, to (a) provide the Person with, or refer to the Person, potential or actual customers; or (b) otherwise market, Advertise, or offer for sale any product, service, or program on the Person's behalf.

D-5. **“CBD Product(s)”** means any product containing, or represented as containing, synthetic or natural cannabidiol.

D-6. “**Company,**” “**You,**” or “**Your**” means **Kushly, LLC**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and Affiliates, and all directors, officers, members, employees, agents, consultants, and other Persons working for or on behalf of the foregoing.

D-7. “**Document(s)**” means the complete original, all drafts, and any non-identical copy, whether different from the original because of notations on the copy, different metadata, or otherwise, of any item covered by 15 U.S.C. § 57b-1(a)(5), 16 C.F.R. § 2.7(a)(2), or Federal Rule of Civil Procedure 34(a)(1)(A).

D-8. “**Identify**” or “**the Identity of**” requires identification of (a) natural Persons by name, title, present business affiliation, present business address, telephone number, and email address or, if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, and the identities of Your contact Persons at the business or organization.

D-9. “**Person**” means a natural Person, an organization, or other legal entity, including a corporation, partnership, sole proprietorship, limited liability company, association, cooperative, or any other group or combination acting as an entity.

D-10. “**Payment Processing**” means the performance of any function of collecting, formatting, charging, transmitting, or processing, whether directly or indirectly, a consumer’s payment for goods or services. Payment Processing includes: providing a merchant, financial institution, Person, or entity, directly or indirectly, with the access or means to charge or debit a consumer’s account; monitoring, tracking, and reconciling payments, returns, refunds, and chargebacks; providing refund services to a merchant; and disbursing funds and receipts to merchants.

IV. INSTRUCTIONS

I-1. **Petitions to Limit or Quash:** You must file any petition to limit or quash this CID with the Secretary of the FTC no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition must set forth all assertions of protected status or other factual and legal objections to the CID and comply with the requirements set forth in 16 C.F.R. § 2.10(a)(1) – (2). **The FTC will not consider petitions to quash or limit if You have not previously met and conferred with FTC staff and, absent extraordinary circumstances, will consider only issues raised during the meet and confer process.** 16 C.F.R. § 2.7(k); *see also* § 2.11(b). **If You file a petition to limit or quash, You must still timely respond to all requests that You do not seek to modify or set aside in Your petition.** 15 U.S.C. § 57b-1(f); 16 C.F.R. § 2.10(b).

I-2. **Withholding Requested Material / Privilege Claims:** For specifications requesting production of Documents or answers to written interrogatories, if You withhold from production any material responsive to this CID based on a claim of privilege, work product protection, statutory exemption, or any similar claim, You must assert the claim no later than the return date of this CID, and You must submit a detailed log, in a searchable electronic format, of the items withheld that Identifies the basis for withholding the material and meets all the requirements set forth in 16 C.F.R. § 2.11(a) – (c). The information in the log must be of sufficient detail to enable

FTC staff to assess the validity of the claim for each Document, including attachments, without disclosing the protected information. If only some portion of any responsive material is privileged, You must submit all non-privileged portions of the material. Otherwise, produce all responsive information and material without redaction. 16 C.F.R. § 2.11(c). The failure to provide information sufficient to support a claim of protected status may result in denial of the claim. 16 C.F.R. § 2.11(a)(1).

I-3. **Modification of Specifications:** The Bureau Director, a Deputy Bureau Director, Associate Director, Regional Director, or Assistant Regional Director must agree in writing to any modifications of this CID. 16 C.F.R. § 2.7(l).

I-4. **Scope of Search:** This CID covers Documents and information in Your possession or under Your actual or constructive custody or control, including Documents and information in the possession, custody, or control of Your attorneys, accountants, directors, officers, employees, service providers, and other agents and consultants, whether or not such Documents or information were received from or disseminated to any Person or entity.

I-5. **Identification of Responsive Documents:** For specifications requesting production of Documents, You must Identify in writing the Documents that are responsive to the specification. Documents that may be responsive to more than one specification of this CID need not be produced more than once. If any Documents responsive to this CID have been previously supplied to the FTC, You may Identify the Documents previously provided and the date of submission.

I-6. **Maintain Document Order:** For specifications requesting production of Documents, You must produce Documents in the order in which they appear in Your files or as electronically stored. If Documents are removed from their original folders, binders, covers, containers, or electronic source, You must specify the folder, binder, cover, container, or electronic media or file paths from which such Documents came.

I-7. **Numbering of Documents:** For specifications requesting production of Documents, You must number all Documents in Your submission with a unique identifier such as a Bates number or a Document ID.

I-8. **Production of Copies:** For specifications requesting production of Documents, unless otherwise stated, You may submit copies in lieu of original Documents if they are true, correct, and complete copies of the originals and You preserve and retain the originals in their same state as of the time You received this CID. Submission of copies constitutes a waiver of any claim as to the authenticity of the copies should the FTC introduce such copies as evidence in any legal proceeding.

I-9. **Production in Color:** For specifications requesting production of Documents, You must produce copies of Advertisements in color, and You must produce copies of other materials in color if necessary to interpret them or render them intelligible.

I-10. **Electronically Stored Information:** For specifications requesting production of Documents, see the attached FTC Bureau of Consumer Protection Production Requirements (“Production Requirements”), which detail all requirements for the production of electronically

stored information to the FTC. You must discuss issues relating to the production of electronically stored information with FTC staff **prior to** production.

I-11. Sensitive Personally Identifiable Information (“Sensitive PII”) or Sensitive Health Information (“SHI”): For specifications requesting production of Documents or answers to written interrogatories, if any responsive materials contain Sensitive PII or SHI, please contact FTC counsel before producing those materials to discuss whether there are steps You can take to minimize the amount of Sensitive PII or SHI You produce, and how to securely transmit such information to the FTC.

Sensitive PII includes an individual’s Social Security number; an individual’s biometric data (such as fingerprints or retina scans, but not photographs); and an individual’s name, address, or phone number in combination with one or more of the following: date of birth, Social Security number, driver’s license or state identification number (or foreign country equivalent), passport number, financial account number, credit card number, or debit card number. SHI includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

I-12. Interrogatory Responses: For specifications requesting answers to written interrogatories: (a) answer each interrogatory and each interrogatory subpart separately, fully, and in writing; and (b) verify that Your answers are true and correct by signing Your answers under the following statement: “I verify under penalty of perjury that the foregoing is true and correct. Executed on (date). (Signature).” The verification must be submitted contemporaneously with Your interrogatory responses.

I-13. Submission of Documents in Lieu of Interrogatory Answers: You may answer any written interrogatory by submitting previously existing Documents that contain the information requested in the interrogatory so long as You clearly indicate in each written interrogatory response which Documents contain the responsive information. For any interrogatory that asks You to Identify Documents, You may, at Your option, produce the Documents responsive to the interrogatory so long as You clearly indicate the specific interrogatory to which such Documents are responsive.

Federal Trade Commission - Bureau of Consumer Protection

Production Requirements

Revised August 2019

In producing information to the FTC, comply with the following requirements, unless the FTC agrees otherwise. If you have questions about these requirements, please contact FTC counsel before production.

Production Format

1. **General Format:** Provide load-ready electronic productions with:
 - a. A delimited data load file (.DAT) containing a line for every document, unique id number for every document (DocID), metadata fields, and native file links where applicable;
 - b. A document level text file, named for the DocID, containing the text of each produced document; and
 - c. An Opticon image load file (.OPT) containing a line for every image file, where applicable.
2. **Electronically Stored Information (ESI):** Documents stored in electronic format in the ordinary course of business must be produced in the following format:
 - a. For ESI other than the categories below, submit in native format. Include document level extracted text or Optical Character Recognition (OCR), all metadata, and corresponding image renderings converted to Group IV, 300 DPI, single-page TIFF (or color JPEG images when necessary to interpret the contents or render them intelligible).
 - b. For Microsoft Excel, Access, or PowerPoint files, submit in native format with extracted text and metadata. Data compilations in Excel spreadsheets or delimited text formats must contain all underlying data, formulas, and algorithms without redaction.
 - c. For other spreadsheet, database, presentation, or multimedia formats; instant messages; or proprietary applications, discuss the production format with FTC counsel.
3. **Hard Copy Documents:** Documents stored in hard copy in the ordinary course of business must be scanned and submitted as 300 DPI single page TIFFs (or color JPEGs when necessary to interpret the contents or render them intelligible), with corresponding document-level OCR text and logical document determination in an accompanying load file.
4. **Document Identification:** Provide a unique DocID for each hard copy or electronic document, consisting of a prefix and a consistent number of numerals using leading zeros. Do not use a space to separate the prefix from numbers.
5. **Attachments:** Preserve the parent/child relationship by producing attachments as separate documents, numbering them consecutively to the parent email, and including a reference to all attachments.

6. **Metadata Production:** For each document submitted electronically, include the standard metadata fields listed below in a standard delimited data load file. The first line of the data load file shall include the field names. Submit date and time data in separate fields. Use these standard Concordance delimiters in delimited data load files:

Description	Symbol	ASCII Character
Field Separator	¶	20
Quote Character	␣	254
Multi Entry delimiter	®	174
<Return> Value in data	~	126

7. **De-duplication:** Do not use de-duplication or email threading software without FTC approval.
8. **Password-Protected Files:** Remove passwords prior to production. If password removal is not possible, provide the original and production filenames and the passwords, under separate cover.

Producing Data to the FTC

1. Prior to production, scan all data and media for viruses and confirm they are virus-free.
2. For productions smaller than 50 GB, submit data electronically using the FTC's secure file transfer protocol. Contact FTC counsel for instructions. **The FTC cannot accept files via Dropbox, Google Drive, OneDrive, or other third-party file transfer sites.**
3. If you submit data using physical media:
 - a. Use only CDs, DVDs, flash drives, or hard drives. Format the media for use with Windows 7;
 - b. Use data encryption to protect any Sensitive Personally Identifiable Information or Sensitive Health Information (as defined in the instructions), and provide passwords in advance of delivery, under separate cover; and
 - c. Use a courier service (e.g., Federal Express, UPS) because heightened security measures delay postal delivery.
4. Provide a transmittal letter with each production that includes:
 - a. Production volume name (e.g., Volume 1) and date of production;
 - b. Numeric DocID range of all documents in the production, and any gaps in the DocID range; and
 - c. List of custodians and the DocID range for each custodian.

DAT FILE FIELDS	DEFINITIONS	POPULATE FIELD FOR:
DocID	Unique ID number for each document	All Documents
FamilyID	Unique ID for all documents in a family including parent and all child documents	All Documents
ParentID	Document ID of the parent document. This field will only be populated on child items	All Documents
File Path	Path to produced native file	All Documents
TextPath	Path to document level text or OCR file	All Documents
Custodian	Name of the record owner/holder	All Documents
AllCustodians	Names of all custodians that had copy of this record (populate if data was deduplicated or email threading was used)	All Documents
Source	Source of documents: CID, Subpoena, Third Party Data, etc.	All Documents
Filename	Original file name	All Documents
File Size	Size of documents	All Documents
File Extensions	Extension of file type	All Documents
MD5 Hash	Unique identifier for electronic data used in de-duplication	All Documents
PRODUCTION_VOLUME	Production Volume	All Documents
HASREDACTIONS	Redacted document	All Documents
Exception Reason	Reason for exception encountered during processing (e.g., empty file, source file, password-protected file, virus)	All Documents
PRODBEG	Beginning production bates number	Documents with Produced Images
PROEND	Ending production bates number	Documents with Produced Images
PRODBEG_ATTACH	Beginning production family bates number	Documents with Produced Images
PRODEND_ATTACH	Ending production family bates number	Documents with Produced Images
Page Count	The number of pages the document contains	Documents with Produced Images
From	Names retrieved from the FROM field in a message	Emails
To	Names retrieved from the TO field in a message; the recipient(s)	Emails
CC	Names retrieved from the CC field in a message; the copied recipient(s)	Emails
BCC	Names retrieved from the BCC field in a message; the blind copied recipient(s)	Emails
EmailSubject	Email subject line	Emails
Date Sent	The date an email message was sent	Emails
Time Sent	The time an email message was sent	Emails
Date Received	The date an email message was received	Emails
Time Received	The time an email message was received	Emails
Author	File Author	Loose Native Files and Email Attachments
Title	File Title	Loose Native Files and Email Attachments
Subject	File Subject	Loose Native Files and Email Attachments
Date Created	Date a document was created by the file system	Loose Native Files and Email Attachments
Time Created	Time a document was created by the file system	Loose Native Files and Email Attachments
Date Modified	Last date a document was modified and recorded by the file system	Loose Native Files and Email Attachments
Time Modified	Last time a document was modified and recorded by the file system	Loose Native Files and Email Attachments
Date Printed	Last date a document was printed and recorded by the file system	Loose Native Files and Email Attachments
Time Printed	Last time a document was printed and recorded by the file system	Loose Native Files and Email Attachments

**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

**RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC
INVESTIGATION OF DIETARY SUPPLEMENTS, FOODS, DRUGS, DEVICES, OR
ANY OTHER PRODUCT OR SERVICE INTENDED TO PROVIDE A HEALTH
BENEFIT OR TO AFFECT THE STRUCTURE OR FUNCTION OF THE BODY**

File No. 002 3191

Nature and Scope of Investigation:

To investigate whether unnamed persons, partnerships, or corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of dietary supplements, foods, drugs, devices, or any other product or service intended to provide a health benefit or to affect the structure or function of the body; have misrepresented or are misrepresenting the safety or efficacy of such products or services; or otherwise have engaged or are engaging in unfair or deceptive acts or practices or in the making of false advertisements, in or affecting commerce, in violation of Sections 5 or 12 of the Federal Trade Commission Act, 15 U.S.C. §§ 45 and 52, as amended. The investigation is also to determine whether Commission action to obtain monetary relief would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed ten (10) years from the date of issuance of this resolution. The expiration of this ten-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the ten-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the ten-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

**APRIL
TABOR** Digitally signed
by APRIL TABOR
Date: 2019.08.12
12:09:40 -04'00'

April J. Tabor
Acting Secretary

Issued: August 9, 2019

CERTIFICATION OF COMPLIANCE
Pursuant to 28 U.S.C. § 1746

I, _____, certify the following with respect to the Federal Trade Commission's ("FTC") Civil Investigative Demand directed to Kushly, LLC (the "Company") (FTC File No. 2023111) (the "CID"):

1. The Company has identified all documents, information, and/or tangible things ("responsive information") in the Company's possession, custody, or control responsive to the CID and either:

- (a) provided such responsive information to the FTC; or
- (b) for any responsive information not provided, given the FTC written objections setting forth the basis for withholding the responsive information.

2. I verify that the responses to the CID are complete and true and correct to my knowledge.

I certify under penalty of perjury that the foregoing is true and correct.

Date: _____

Signature

Printed Name

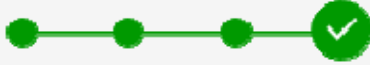
Title

McPeek, Brent

From: TrackingUpdates@fedex.com
Sent: Monday, May 11, 2020 11:21 AM
To: Tepfer, Reid A.
Subject: FedEx Shipment 770417156096 Delivered

Your package has been delivered

Tracking # 770417156096

Ship date: Fri, 5/8/2020 <hr/> Anita Thomas Federal Trade Commission Washington, DC 20024 US	 Delivered	Delivery date: Mon, 5/11/2020 9:19 am <hr/> Kushly, LLC c/o Sam Conley 9148 North 66th Place PARADISE VALLEY, AZ 85253 US
---	--	---




Shipment Facts

Our records indicate that the following package has been delivered.

Tracking number:	770417156096
Status:	Delivered: 05/11/2020 09:19 AM Signed for By: S.CONLEY
Purchase order number:	0616
Reference:	2023111/598388
Signed for by:	S.CONLEY
Delivery location:	PARADISE VALLEY, AZ
Delivered to:	Residence
Service type:	FedEx Priority Overnight®
Packaging type:	FedEx® Envelope
Number of pieces:	1
Weight:	0.50 lb.
Special handling/Services:	Deliver Weekday Residential Delivery Direct Signature Required

Standard transit:

5/11/2020 by 10:30 am

 Please do not respond to this message. This email was sent from an unattended mailbox. This report was generated at approximately 11:21 AM CDT on 05/11/2020.

All weights are estimated.

To track the latest status of your shipment, click on the tracking number above.

Standard transit is the date and time the package is scheduled to be delivered by, based on the selected service, destination and ship date. Limitations and exceptions may apply. Please see the FedEx Service Guide for terms and conditions of service, including the FedEx Money-Back Guarantee, or contact your FedEx Customer Support representative.

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Thank you for your business.

IMPORTANT!

We are continuing to respond to the impact of COVID-19 around the world. [See our latest updates.](#) For COVID-19-related recipient closures, you can [redirect packages](#), [Ask FedEx](#), or contact the shipper.



770417156096



Delivered
Monday 5/11/2020 at 9:19 am



DELIVERED

Signed for by: S.CONLEY

[GET STATUS UPDATES](#)

[OBTAIN PROOF OF DELIVERY](#)

FROM
Washington, DC US

TO
PARADISE VALLEY, AZ US

Shipment Facts

TRACKING NUMBER
770417156096

SERVICE
FedEx Priority Overnight

WEIGHT
0.5 lbs / 0.23 kgs

SIGNATURE SERVICES
Direct signature required

DELIVERED TO
Residence

TOTAL PIECES
1

TOTAL SHIPMENT WEIGHT
0.5 lbs / 0.23 kgs

TERMS
Shipper

PURCHASE ORDER NUMBER
0616

SHIPPER REFERENCE
2023111/598388

PACKAGING
FedEx Envelope

SPECIAL HANDLING SECTION
Deliver Weekday, Residential Delivery,
Direct Signature Required

STANDARD TRANSIT
 5/11/2020 by 10:30 am

SHIP DATE
 Fri 5/08/2020

ACTUAL DELIVERY
Mon 5/11/2020 9:19 am

Travel History

Local Scan Time

Monday, 5/11/2020

9:19 am	PARADISE VALLEY, AZ	Delivered
8:17 am	SCOTTSDALE, AZ	On FedEx vehicle for delivery
7:19 am	SCOTTSDALE, AZ	At local FedEx facility



Pet. Exh. 5 - 1

2:31 am	PHOENIX, AZ	At local FedEx facility
Sunday, 5/10/2020		
6:32 pm	PHOENIX, AZ	At destination sort facility
5:37 pm	MEMPHIS, TN	Departed FedEx location
Friday, 5/08/2020		
8:40 pm	CROFTON, MD	Left FedEx origin facility
10:03 am	CROFTON, MD	Picked up
7:01 am		Shipment information sent to FedEx



ARTICLES OF AMENDMENT TO ARTICLES OF ORGANIZATION

LIMITED LIABILITY COMPANY

ENTITY INFORMATION

ENTITY NAME: KUSHLY LLC
ENTITY ID: L21560502
ENTITY TYPE: Domestic LLC
PERIOD OF DURATION: Perpetual
PROFESSIONAL SERVICES:
CHARACTER OF BUSINESS: Any legal purpose
MANAGEMENT STRUCTURE: Manager-Managed

STATUTORY AGENT INFORMATION

STATUTORY AGENT NAME: JEFFREY M PROPER
PHYSICAL ADDRESS: 10645 N TATUM BLVD STE 200-652 , PHOENIX, AZ 85028
MAILING ADDRESS: 10645 N TATUM BLVD STE 200-652 , PHOENIX, AZ 85028

KNOWN PLACE OF BUSINESS

% CODY ALT 3015 N SCOTTSDALE RD, #3139, SCOTTSDALE, AZ 85251

PRINCIPALS

Manager: AZ KUSHLY HOLDINGS LLC - C/O JEFFREY M PROPER 10645 N TATUM BLVD STE 200-652, PHOENIX, AZ 85028 - - Date of Taking Office: 06/13/2017

Manager: CODY JOSEPH ALT - 3015 N SCOTTSDALE RD APT 3139, SCOTTSDALE, AZ 85251 - - Date of Taking Office: 01/27/2017

Member: AZ KUSHLY HOLDINGS LLC - C/O JEFFREY M PROPER 10645 N TATUM BLVD STE 200-652, PHOENIX, AZ 85028 - - Date of Taking Office: 06/13/2017

Member: Cody Alt - % CODY ALT 3015 N SCOTTSDALE RD, #3139, SCOTTSDALE, AZ 85251 - - Date of Taking Office: 01/27/2017

SIGNATURE

Manager: Cody Joseph Alt - 07/09/2018

LLC - STATEMENT OF CHANGE

OF KNOWN PLACE OF BUSINESS OR STATUTORY AGENT

ENTITY INFORMATION

ENTITY NAME: KUSHLY LLC
ENTITY ID: L21560502
ENTITY TYPE: Domestic LLC

STATUTORY AGENT INFORMATION

STATUTORY AGENT NAME: Sam Conley
PHYSICAL ADDRESS: 9148 N 66th Pl, PARADISE VALLEY, AZ 85253
MAILING ADDRESS: 9148 N 66th Pl, PARADISE VALLEY, AZ 85253

KNOWN PLACE OF BUSINESS

7167 e Rancho Vista dr #3014, SCOTTSDALE, AZ 85251

SIGNATURES

Authorized Agent: Sam Conley - 09/09/2019

ARTICLES OF ORGANIZATION

OF LIMITED LIABILITY COMPANY

ENTITY INFORMATION

ENTITY NAME: Kushly Industries LLC
ENTITY ID: 1952742
ENTITY TYPE: Domestic LLC
EFFECTIVE DATE: 02/19/2019
CHARACTER OF BUSINESS: Health Supplements
MANAGEMENT STRUCTURE: Member-Managed
PERIOD OF DURATION: Perpetual
PROFESSIONAL SERVICES: N/A

STATUTORY AGENT INFORMATION

STATUTORY AGENT NAME: Cody Alt
PHYSICAL ADDRESS: 7167 E Rancho Vista Dr, SCOTTSDALE, AZ 85251
MAILING ADDRESS:

KNOWN PLACE OF BUSINESS

7167 E Rancho Vista Dr, SCOTTSDALE, AZ 85251

PRINCIPALS

Member: Cody Alt - 7167 E Rancho Vista Dr, SCOTTSDALE, AZ 85251 - cody.alt@live.com - Date of Taking Office:

ORGANIZERS

Cody Alt: 7167 E Rancho Vista Dr, SCOTTSDALE, AZ 85251, cody.alt@live.com

SIGNATURES

Organizer: Cody Alt - 02/20/2019

ARTICLES OF AMENDMENT TO ARTICLES OF ORGANIZATION

LIMITED LIABILITY COMPANY

ENTITY INFORMATION

ENTITY NAME: AZ KUSHLY HOLDINGS, LLC
ENTITY ID: L21943567
ENTITY TYPE: Domestic LLC
PERIOD OF DURATION: Perpetual
PROFESSIONAL SERVICES:
CHARACTER OF BUSINESS: Any legal purpose
MANAGEMENT STRUCTURE: Manager-Managed

STATUTORY AGENT INFORMATION

STATUTORY AGENT NAME: JEFFREY M PROPER
PHYSICAL ADDRESS: 10645 N TATUM BLVD STE 200-652 , PHOENIX, AZ 85028
MAILING ADDRESS: 10645 N TATUM BLVD STE 200-652 , PHOENIX, AZ 85028

KNOWN PLACE OF BUSINESS

3550 N CENTRAL AVE. SUITE 1010 , PHOENIX, AZ 85012

PRINCIPALS

Manager: ROBERT KHOSHABA - C/O JEFFREY M. PROPER 10645 N TATUM BLVD STE 200-652, PHOENIX, AZ 85028 - - Date of Taking Office: 06/13/2017
Member: ROBERT KHOSHABA - C/O JEFFREY M. PROPER 10645 N TATUM BLVD STE 200-652, PHOENIX, AZ 85028 - - Date of Taking Office: 06/13/2017

SIGNATURE

Manager: Robert Khoshaba - 06/13/2018

McPeck, Brent

From: Tepfer, Reid A.
Sent: Tuesday, May 26, 2020 9:22 AM
To: info@kushly.com
Subject: Federal Trade Commission Civil Investigative Demand
Attachments: FTC CID to Kushly LLC.pdf

Importance: High

To whom it may concern:

The Federal Trade Commission issued the attached Civil Investigative Demand (CID) to Kushly, LLC on May 6, 2020. According to FedEx, this CID was delivered to the company's registered agent on May 11.

The CID requires that you contact FTC counsel as soon as possible to schedule a meeting to be held within 14 days after receiving the CID. You have missed this deadline. Accordingly, I am attempting to contact Kushly, LLC to request that this meeting be scheduled as soon as possible.

If you are represented by counsel in this matter, please do not respond to this email and instead forward this communication to your attorney.

Thanks,
Reid

Reid Tepfer
Federal Trade Commission
214-979-9395

McPeck, Brent

From: Tepfer, Reid A.
Sent: Friday, June 5, 2020 4:22 PM
To: 'Sam Conley'
Subject: RE: Kushly 2023111

Mr. Conley,

Thank you for this information. However, today is the deadline for responding to the Commission's civil investigative demand, and Kushly will be in default of its obligation after 5pm today. Accordingly, I must advise that Kushly is obligated to turn over the records demanded by the CID immediately.

Respectfully,
Reid

Reid Tepfer
Federal Trade Commission
214-979-9395

-----Original Message-----

From: Sam Conley <sam@kushly.com>
Sent: Friday, June 5, 2020 3:41 PM
To: Tepfer, Reid A. <rtepfer@ftc.gov>
Subject: Re: Kushly 2023111

Hi Reid,

I'm working through our information and the business structure prior to my joining the company. We will be seeking counsel on responding. We are confident in the integrity of the business, there have just been changes in structure and ownership that require multiple parties to respond and provide information.

I want to make sure we get you all the information you need in good standing and think we need some advice on how to properly respond to this in parallel to running a compliant operation.

Best,

Sam Conley
COO
Kushly
m: 770.286.7499

> On Jun 3, 2020, at 9:55 AM, Tepfer, Reid A. <rtepfer@ftc.gov> wrote:

>
> Thank you, Mr. Conley; I appreciate it.
>
> Reid
>
> Reid Tepfer
> Federal Trade Commission

> 214-979-9395

>

>> On Jun 3, 2020, at 11:51 AM, Sam Conley <sam@kushly.com> wrote:

>>

>> Hi Reid,

>>

>> I am focusing my attention on this today and will get you a solid answer ASAP. I hope to have a substantial piece of things over to you by the 5th and work together on what is needed moving forward.

>>

>> Best,

>>

>> Sam Conley

>> COO

>> Kushly

>> m: 770.286.7499

>>

>>>> On Jun 2, 2020, at 10:44 AM, Tepfer, Reid A. <rtepfer@ftc.gov> wrote:

>>>>

>>>> Mr. Conley,

>>>>

>>>> I'm following up on my message below given that Kushly's production deadline is approaching and has not yet been extended. Please let me know when you will be able to provide the requested information.

>>>>

>>>> Thank you,

>>>> Reid

>>>>

>>>> Reid Tepfer

>>>> Federal Trade Commission

>>>> 214-979-9395

>>>>

>>>> -----Original Message-----

>>>> From: Tepfer, Reid A.

>>>> Sent: Friday, May 29, 2020 6:01 PM

>>>> To: 'Sam Conley' <sam@kushly.com>

>>>> Subject: RE: Kushly 2023111

>>>>

>>>> Mr. Conley,

>>>>

>>>> I understand your concern, and accordingly we would be willing to work out a rolling production schedule with you. I should mention I am not authorized to extend the CID's deadlines myself and would have to get any deadline extension approved by my management. If approved, I will provide you a letter from our office's regional director formally authorizing the extension.

>>>>

>>>> Can you please identify which interrogatories and requests for production you can produce on time by June 5?

Additionally, can you please identify which interrogatories and requests for production you would be able to produce by June 19 and, separately, by July 6?

>>>>

>>>> Thank you,

>>>> Reid

>>>>

>>>> Reid Tepfer

>>>> Federal Trade Commission

>>> 214-979-9395

>>>

>>>

>>> -----Original Message-----

>>> From: Sam Conley <sam@kushly.com>

>>> Sent: Friday, May 29, 2020 2:34 PM

>>> To: Tepfer, Reid A. <rtepf@ftc.gov>

>>> Subject: Re: Kushly 2023111

>>>

>>> Hi Reid,

>>>

>>> I'll get you as much as I can by the 5th. We are a 4 person operation so time is a premium but this is obviously a top priority. Is there an option of an extension for this information?

>>>

>>> Sam Conley

>>> COO

>>> Kushly

>>> m: 770.286.7499

>>>

>>>> On May 28, 2020, at 2:21 PM, Tepfer, Reid A. <rtepf@ftc.gov> wrote:

>>>>

>>>> Good afternoon Mr. Conley,

>>>>

>>>> Following up on our discussion, I wanted to see if we could schedule a time for the meet and confer given that the production deadline (June 5) is not far off.

>>>>

>>>> Also, as I mentioned before, if Kushly is now represented in this matter, please forward this communication to counsel rather than responding. If you've decided that Kushly will handle this matter without counsel, please let me know that as well.

>>>>

>>>> Thank you,

>>>> Reid

>>>>

>>>> Reid Tepfer

>>>> Federal Trade Commission

>>>> 214-979-9395

>>>>

>>>>

>>>> -----Original Message-----

>>>> From: Sam Conley <sam@kushly.com>

>>>> Sent: Tuesday, May 26, 2020 1:04 PM

>>>> To: Tepfer, Reid A. <rtepf@ftc.gov>

>>>> Subject: Kushly 2023111

>>>>

>>>> Hi Reid,

>>>>

>>>> I just received the forwarded communication by mail and wanted to get together as soon as possible. I called directly but didn't receive an answer. Can we setup a time to get on an initial call? We do not have counsel on this currently and are hoping we don't need it.

>>>>

>>>> Best Regards,

>>>>

>>>> Sam Conley
>>>>
>>>> m: 770.286.7499
>>>>
>>>>
>>>> Sam Conley
>>>> COO
>>>> Kushly
>>>> m: 770.286.7499

McPeck, Brent

From: Tepfer, Reid A.
Sent: Friday, June 12, 2020 3:35 PM
To: 'Sam Conley'
Subject: Federal Trade Commission Civil Investigative Demand
Attachments: Kushly. Letter. 6 12 20.pdf

Mr. Conley,

Please see the attached letter.

Thanks,
Reid

Reid Tepfer
Federal Trade Commission
214-979-9395



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

Reid Tepfer

Federal Trade Commission – Southwest Region
1999 Bryan Street, Suite 2150
Dallas, Texas 75201

June 12, 2020

Via email to sam@kushly.com

Kushly, LLC
c/o Sam Conley
9148 North 66th Place
Paradise Valley, Arizona 85253

Re: Civil Investigative Demand issued to Kushly, LLC; FTC Matter No. 2023111

Mr. Conley:

I write regarding Kushly, LLC's continued noncompliance with the above-referenced civil investigative demand ("CID"). The deadline to respond to this CID was June 5, 2020. Kushly, LLC has failed to meet this deadline and therefore is in default of its legal obligations under the CID.

Through several email communications, I sought to discuss with you Kushly's production obligations. On May 29, 2020, you expressed concern about meeting the CID's deadline, and I attempted to discuss with you the possibility of a modified rolling production schedule. You did not respond to this proposal. On June 2, 2020, I followed up with you to request a response and advised you that the CID deadline had not been extended. In response, you assured me that you were focusing your attention on this matter and would respond to my proposal ASAP.

We have received no production from Kushly to date. Instead, we received only an email alleging that Kushly will be seeking counsel to respond to our CID at some future time. Nearly a week after the deadline has passed Kushly remains in default in its obligations.

This letter provides Kushly a deadline of **June 19, 2020**, to produce overdue answers to interrogatories and responsive documents. Provided this deadline is met, we will refrain from

Kushly, LLC
June 12, 2020
Page 2

judicial enforcement of the CID. Your failure to meet this deadline will be grounds for proceeding with an enforcement action in U.S. district court.

To be clear, this letter does not constitute a further extension of the deadline to respond to the CID, nor does it modify any of the terms or specifications in the CID. Instead, this letter merely states the conditions under which our office will forebear from seeking enforcement.

Very truly yours,

/s/ Reid Tepfer

Reid Tepfer
Attorney
Federal Trade Commission

cc: Michele Arington, Esq., Office of the General Counsel

McPeck, Brent

From: Tepfer, Reid A.
Sent: Thursday, June 25, 2020 9:50 AM
To: 'Sam Conley'
Cc: Arington, Michele; 'info@kushly.com'
Subject: Federal Trade Commission Civil Investigative Demand
Attachments: Kushly. Letter. 6 25 20.pdf

Mr. Conley,

Please see the attached letter.

Thanks,
Reid

Reid Tepfer
Federal Trade Commission
214-979-9395



United States of America
FEDERAL TRADE COMMISSION
Southwest Region

Reid Tepfer

Federal Trade Commission – Southwest Region
1999 Bryan Street, Suite 2150
Dallas, Texas 75201

June 25, 2020

Via email to sam@kushly.com

Kushly, LLC
c/o Sam Conley
9148 North 66th Place
Paradise Valley, Arizona 85253

Re: Civil Investigative Demand issued to Kushly, LLC; FTC Matter No. 2023111

Mr. Conley:

I write concerning Kushly, LLC's continued noncompliance with the above-referenced civil investigative demand ("CID"). The CID's response deadline was June 5, 2020. Kushly failed to meet this deadline and therefore has been in default of its legal obligations under the CID since that date. On June 12, 2020, I advised you that, although we were not extending Kushly's deadline to produce the overdue information, we would forebear referring this matter to the FTC General Counsel's Office for judicial enforcement of the CID if Kushly produced information by June 19, 2020. To date, we have received no response to this letter nor any production from Kushly.

Accordingly, I am advising you that I am referring this matter to the FTC General Counsel's Office for judicial enforcement in federal district court.

Very truly yours,

/s/ Reid Tepfer

Reid Tepfer
Federal Trade Commission

cc: Michele Arington, Esq., Office of the General Counsel

McPeck, Brent

From: Tepfer, Reid A.
Sent: Thursday, June 25, 2020 12:30 PM
To: Sam Conley
Cc: Arington, Michele; info@kushly.com
Subject: RE: Federal Trade Commission Civil Investigative Demand

Mr. Conley,

Your reply suggests that Kushly may be represented by counsel in this matter. Please confirm whether or not that is the case. If Kushly is represented by counsel, I can only speak with Kushly's counsel absent a waiver.

Thanks,
Reid

Reid Tepfer
Federal Trade Commission
214-979-9395

From: Sam Conley <sam@kushly.com>
Sent: Thursday, June 25, 2020 10:55 AM
To: Tepfer, Reid A. <rtepfer@ftc.gov>
Cc: Arington, Michele <MARINGTON@ftc.gov>; info@kushly.com
Subject: Re: Federal Trade Commission Civil Investigative Demand

Thank you Reid,

We referred this to a lawyer and received no movement or advice, we are very frustrated. As we are a small unprofitable business we are a little underwater on how to handle this one but take it very seriously and want to respond appropriately.

Can I ask who I can respond to with the requested information or do we need to wait on communication from your counsel?

Sam Conley
COO
Kushly
m: 770.286.7499

On Jun 25, 2020, at 7:51 AM, Tepfer, Reid A. <rtepfer@ftc.gov> wrote:

Mr. Conley,

Please see the attached letter.

Thanks,
Reid

Reid Tepfer
Federal Trade Commission
214-979-9395

<Kushly. Letter. 6 25 20.pdf>



HOME > NEWS > CBD OIL & PARKINSON'S DISEASE: EVERYTHING YOU NEED TO KNOW



CBD Oil & Parkinson's Disease: Everything You Need to Know

□ Landon Neubauer - □ October 28, 2019 - □ News - □ 0 Comments

Ever since the introduction and apparent boom of the CBD industry, it is no denying that various attempts have already been done to review its potential in treating different neurological illnesses, including Parkinson's Disease.

To date, although there is much more to be discovered about this compound and its effect on the human body, available studies focusing on the connection of CBD and Parkinson's Disease somehow show that cannabidiol has the potential to offer relief for the debilitating symptoms of Parkinson's Disease.

To let you stay updated and recognize what scientists have discovered about the true connection of CBD and PD so far, we have prepared an extensive guide on what you need to know about this topic.

Read on.

What is CBD?

CBD, or cannabidiol, refers to a type of chemical compound found in the cannabis plant. Essentially, it is one of the 120 molecules, called "cannabinoids," produced uniquely by the cannabis family.

Similar to tetrahydrocannabinol (THC), another type of cannabinoid found in the cannabis plant, CBD promises a lot of therapeutic effects, including pain relief, anti-inflammation, and anti-anxiety.

However, despite the similarity in terms of their therapeutic properties, what distinguishes CBD from THC is that the former is non-psychoactive, meaning it doesn't produce the "high" sensation associated with marijuana consumption. This is because unlike THC, CBD's chemical structure prevents it from attaching to brain receptors associated with thinking, memory, pleasure, coordination, and time perception. Because of this, it fails to stimulate cells in the brain into releasing loads of dopamine that results in euphoric or "high" feelings.

This non-psychoactive quality of CBD, which does not alter a person's state of mind, makes it a potential alternative to enjoy the medical benefits similar to THC without experiencing the feelings of euphoria, or the "high" associated with marijuana consumption.

To date, many studies have already been done to review and confirm the therapeutic effects of CBD, especially in alleviating pain and stress when consumed. Although research on such topics remains to be limited and needs further studies, available sources positively show the compound's promising potential in treating broad variety of illnesses, such as epilepsy, depression and anxiety, acne and other skin issues, and even neurodegenerative disorders. This has caused an instant proliferation of CBD products in the market, including CBD oil, CBD edibles, CBD topicals, and even capsules.

What is Parkinson's Disease?

Parkinson's Disease, or PD, is a type of neurodegenerative disorder that affects predominately the nerve cells in the brain called substantia nigra, which is responsible for producing dopamine. Since dopamine works as a signaling molecule, which plays a role in motor coordination, reward, and memory, the loss of dopamine neurons in the midbrain leads to the slowness of movement and resting tremor.

As the disease progresses and the brain continues to lose more and more dopamine, patients will start experiencing tremors, slowing, and stiffening of movements, which will develop over time and may even cause dementia.

Among its most common symptoms include tremors in the hands, reduced sense of coordination and balance, impaired posture, slow or rigid movements, and sleep problems. To date, scientists are not sure what exactly causes Parkinson's disease. However, they do know that the trouble starts with the death of dopamine in the substantia nigra.

Although no one knows what triggers the death of those cells, scientists have linked low dopamine levels, low norepinephrine levels, the presence of Lewy bodies in the brain, autoimmune factors, and genetic factors as the possible causes of this disease.

Parkinson's disease is a lifelong condition and has no available cure to date. However, varying treatment options are available to help relieve the symptoms and maintain the quality of life of patients. This includes therapies, medication, and even surgery.

CBD Oil and Parkinson's Disease: What's the Link?

Similar to other studies focusing on CBD's **medical potential**, research on the connection of CBD oil and Parkinson's remain to be limited and had only begun in recent decades. However, despite this, many anecdotal reports, patient surveys, and studies already suggest that CBD shows promising potential in offering relief for the debilitating symptoms of Parkinson's.

To make it more particular, here are a few findings from recent studies done by doctors and scientists in relation to CBD oil and PD.

Read on.

- Pain

For years, CBD has taken the spotlight as a natural supplement for pain-management. In fact, just recently, news about the US government funding nine new research grants to study the pain-relieving effects of CBD broke out in late September. With this, it is no wonder that CBD is also now being linked to treating PD-related pain.

In fact, in one small study conducted in 2014, 22 patients with PD were evaluated before and after 30 minutes of smoking cannabis using the Unified Parkinson Disease Rating Scale, the visual analog scale, the present pain intensity scale, the Short-Form McGill Pain Questionnaire, and the Medical Cannabis Survey National Drug and Alcohol Research Center Questionnaire.

From there, researchers were able to discover that there has been a significant improvement in terms of sleep and pain scores in PD patients after consuming marijuana. No significant adverse effects of the drug were also observed in the study. However, since the research involves only 22 patients, larger, controlled studies are still needed to verify the results.

- Tremors

Another therapeutic benefit linked to CBD oil is its ability to ease **tremors** or uncontrolled muscle movements usually associated with PD.

In fact, in a study conducted in 1986, researchers from the University of Arizona Medical Center gave doses of CBD to 5 patients with dystonic movement disorders over a 6-week period.

From there, dose-related improvement in dystonia has been observed in all patients, ranging from 20% to 50%, thereby suggesting that CBD may be able to help ease muscle movements for people with Parkinson's Disease.

- Psychosis

As PD progresses, diagnosed patients are at risk of developing Parkinson's disease psychosis (PDP), which is typically defined by delusions, delirium, and hallucinations. While medications are available to treat Parkinson's psychosis, treatment options remain to be limited. With this, many people wonder whether CBD can help reduce the severity of this symptom.

In one study conducted in 2009, a group of researchers provided CBD in flexible doses (starting from 150 mg/day) to 6 outpatients diagnosed with PD and had psychosis for at least 3 months. Using the Brief Psychiatric Rating Scale and the Parkinson Psychosis Questionnaire, the researchers discovered that the results of the evaluation showed a significant decrease in psychotic symptoms in patients after the treatment. No adverse effect was also observed during the study.

Final Thought

To date, although research concerning the therapeutic effects of CBD for persons with PD remains to be limited, available sources published in the recent years already suggest that CBD may help PD patients enjoy better life quality despite their conditions.

TAGS: CBD, CBD OIL, MEDICAL MARIJUANA, PARKINSON'S DISEASE, PD

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Kushly is a premium CBD company providing the highest quality, full-spectrum CBD products on the market.

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HOME > NEWS > MIND YOUR HEAD: TAKING CBD FOR ANXIETY RELIEF



Mind Your Head: Taking CBD for Anxiety Relief

□ Landon Neubauer - □ September 6, 2019 - □ News - □ 0 Comments

Depression isn't the only mental condition that can ruin a person's quality of life. In fact, younger individuals experience anxiety symptoms due to a number of reasons. Stress can be a contributing factor as well as lifestyle, but more importantly, people with anxiety have a chemical imbalance in their brains, that can trigger the panic attacks.

From the sudden surge of emotions to the gradual increase of heart rate and sweaty hands, symptoms can be crazy. One minute, a person can experience all these things at once which affect their productivity at work and peace of mind. Pharmaceuticals may help lessen the symptoms but depending on these medicines for a long time may not be good for the body. Hence, it is important to find a natural alternative that actually helps the body deal with the triggers and help an individual get back on their feet.

Good thing, researchers and scientists have discovered the miracle compound found in the marijuana plant, that is Cannabidiol or CBD. Get to know this compound and how it can help people suffering from an anxiety disorder.

What Is CBD?

The marijuana plant is nature's best when it comes to therapeutic and healing properties. Even our ancestors were known to have used this plant for a thousand years until the scientists have confirmed that this plant is extraordinary.

Cannabis or marijuana contains a lot of Phytocannabinoids like CBD and the other compound Tetrahydrocannabinol or THC. The difference between the two is that THC gives off psychoactive effects associated with the marijuana plant. Meaning, this compound makes a person high, when this is consumed.

Now, CBD is preferred by many for its healing effects especially when it comes to muscle and joint relief. When consumed or applied to the affected areas of the body, a person can easily feel comfort and relief.

How Can CBD Help With Anxiety?

Cannabidiol works in the endocrine system, which controls or regulates the hormones in the body. It also affects a person's sleep cycle, stress levels, and metabolism. To put it simply, cannabidiol interacts with the receptors to **help lower down stress and promote relaxation**.

For instance, if a person suddenly felt an abnormal increase in heart rate, by taking CBD, he or she can feel at ease and comfortable. The compound works fast and provides instant relief.

CBD Oil

One of the popular cannabidiol products come in the form of oils. This substance can be mixed with food and drinks, applied on the skin and even vaped. Most of the time, people use CBD oil to aid muscle recovery from excessive physical activities in the gym or at work. These can be purchased on the Internet but there are also licensed dispensaries that sell this product.

The good thing about this variety is it gives an instant effect. These are potent and pure, so the result shows. When used to the skin, one can immediately feel the difference, faster compared to consuming the product.

Best CBD Products for Anxiety

Due to the legalization of marijuana in different states in the United States and Canada, more and more products are sprouting in the market. In fact, in 2018, there is a massive unregulated market in CBD products rooting mainly from heightened customer's demands.

If you're after CBD's health and relief properties, check out these products:

CBD Gummies

A fun way of consuming CBD is through edibles. The **CBD Gummies** are not just any gummy bear candies in the market because it tastes like Sour Patch Kid only in a gummy bear form. It's sweet, sour and really tasty, plus it contains essential vitamin B12, D3 and antioxidants formulated to keep the body strong and healthy. Not to mention the CBD content which makes your sleep like a baby.

Pop these into your mouth every time the attacks kick in because you'll feel a sense of relaxation due to the cannabidiol.

Pure Kind Botanicals Wellness Nectar

A few drops of this CBD oil can help anxiety subside. Best used morning and night to help boost your mood, improve

sleep and ease anxiety symptoms. Once you feel that the attacks are settling in, apply a few drops on your head or chest. This particular product works like magic, not to mention, it is sustainable and guaranteed potent.

CBD and Adaptogen-Infused Sparkling Water

Recess introduces a revolutionary product to help refresh the mind and body. This sparkling water is special because it contains Schisandra for immunity, American ginseng to improve memory, Hemp extract to calm the mind and L-theanine to reduce stress levels. It's a refreshing drink that gives you an extra push to be productive and functional throughout the day. This product comes in 6 or 8 packs of sparkling water and with flavors Blackberry Chai, Pom Hibiscus and Peach Ginger.

Plus CBD Oil Capsules

These gel capsules are the ultimate answer to wane symptoms of anxiety. It comes in two strengths: 10mg and 5mg of cannabidiol. Depending on your preferences, you can choose the one that's mild for not-so-frequent attacks and the potent one for prevalent symptoms.

Aside from CBD, it also has Fatty acids, plant sterols, Vitamin E, Terpenes and Chlorophyll.

CBD Bath Bombs

Let your mind and body experience a rejuvenating retreat by using these bath bombs. These contain 50mg of CBD, stronger compared to other varieties. Good for daily use, this product helps relieve chronic pain and at the same time, take away all your stress and help with your skin issues like Psoriasis, dry skin, acne and eczema.

Dealing with anxiety is surely hard, especially if you don't really know the trigger factors. However, you can still live a normal life without worries, using these CBD products. Just make sure to follow a healthy diet coupled with exercise to keep your mind and body in its best shape. Finally, don't be afraid to use natural remedies and alternatives to prevent side effects brought by chemicals in most medicines. Doctors can also help if you just can't deal with the symptoms anymore.

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Civil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the District of Arizona.

The completed cover sheet must be printed directly to PDF and filed as an attachment to the Complaint or Notice of Removal.

Plaintiff(s): Federal Trade Commission

Defendant(s): Kushly, LLC

County of Residence: Outside the State of Arizona

County of Residence: Maricopa

County Where Claim For Relief Arose: Maricopa

Plaintiff's Atty(s):

Defendant's Atty(s):

Reid A. Tepfer
Federal Trade Commission
1999 Bryan Street, Suite 2150
Dallas, Texas 75201
214-979-9395

Luis H. Gallegos
Federal Trade Commission
1999 Bryan Street, Suite 2150
Dallas, Texas 75201
214-979-9383

II. Basis of Jurisdiction: **1. U.S. Government Plaintiff**

III. Citizenship of Principal Parties (Diversity Cases Only)

Plaintiff:- N/A
Defendant:- N/A

IV. Origin : **1. Original Proceeding**

V. Nature of Suit: **890 Other Statutory Actions**

VI. Cause of Action: **U.S. Civil Statute 15 USC § 57b-1 Petition to enforce civil investigative demand**

VII. Requested in Complaint

Class Action: **No**
Dollar Demand: **Enforce civil investigative demand**

Jury Demand: **No**

VIII. This case is not related to another case.

Signature: /s/ Reid A. Tepfer

Date: July 30, 2020

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, save this form as a PDF and include it as an attachment to your case opening documents.

Revised: 01/2014

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Case No. _____

Federal Trade Commission,

Petitioner,

v.

Kushly, LLC,
a limited liability company,

Respondent.

**[PROPOSED] ORDER TO
SHOW CAUSE**

Petitioner, the Federal Trade Commission (“FTC”), under the authority conferred by Section 20 of the FTC Act, 15 U.S.C. § 57b-1 and Fed. R. Civ. P. 81(a)(5), has invoked the aid of this Court for an order requiring Respondent,

Kushly, LLC, to comply with a civil investigative demand (“CID”), issued to it on May 6, 2020, in aid of an FTC law enforcement investigation.

1 The Court has considered the FTC's Petition to Enforce Civil Investigative
2 Demand and the papers filed in support thereof; and it appears to the Court that
3 Petitioner has shown good cause for the entry of this Order.

4 **IT IS HEREBY ORDERED** that, within _____ days after entry of this
5 Order, by _____, 20____, Respondent shall (1) Produce forthwith to
6 the Commission: (a) all non-privileged documents responsive to
7 the Commission's May 6, 2020 CID; (b) a privilege log listing all responsive
8 documents withheld based upon a claim of privilege; (c) narrative responses to all
9 interrogatories in the May 6, 2020 CID; and (d) sworn certifications as to the
10 completeness of the production and interrogatory response;

11 **OR**

12 (2) By that date, file and serve (by hand or electronically via email) on counsel for
13 the Commission its response to the Commission's petition. As Respondent did not
14 file a petition to limit or quash the May 6, 2020 CID, any response to the
15 Commission must demonstrate good cause for the failure to raise such objections
16 previously. Absent such good cause shown, no objections that could have been, but
17 were not, raised in an administrative petition to quash shall be considered. Any
18 reply by the Commission to an opposition filed by Respondent shall be filed with
19 the Court and served (by hand or electronically via email) on counsel for

20

1 Respondent. Such reply shall be filed and served no later than _____ days after
2 service of Respondent's opposition.

3 **IT IS FURTHER ORDERED** that if Respondent files an opposition,
4 Respondent shall appear by telephone by dialing _____ at ___ __ a.m./p.m.
5 on the ____ day of _____, 2020, in Courtroom No. ____ of the United
6 States Courthouse for the District of Arizona, Phoenix, Arizona, and show cause, if
7 any there be, why this Court should not enter an order, subject to the penalty of
8 contempt, directing them to comply with the Commission's May 6, 2020 CID.
9 Unless the Court determines otherwise, notwithstanding the filing or pending of
10 any procedural or other motions, all issues raised by the petition and supporting
11 papers, and any opposition to the petition will be considered at the hearing on the
12 petition, and the allegations of said petition shall be deemed admitted unless
13 controverted by a specific factual showing; and

14 **IT IS FURTHER ORDERED** that, pursuant to Fed. R. Civ. P. 81(a)(5) and
15 26(a)(1)(B)(v), this is a summary proceeding and no party shall be entitled to
16 discovery without further order of the Court upon a specific showing of need; and
17 that the dates for a hearing and the filing of papers established by this Order shall
18 not be altered without prior order of the Court upon good cause shown; and

19 **IT IS FURTHER ORDERED** that, pursuant to Fed. R. Civ. P. 81(a)(5) and
20 its 1946 Advisory Committee note, a copy of this Order and copies of said Petition

1 and exhibits filed therewith, shall be served forthwith by Petitioner upon
2 Respondent and/or its counsel, using as expeditious means as practicable.

3 **IT IS FURTHER ORDERED** that counsel for the Federal Trade
4 Commission may appear telephonically at the _____, 2020 show cause hearing.

5 It is so **ORDERED**.

6

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