# LUNCH WITH A SIDE OF CBD BROWNIE...?

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## Munch the Numbers

- Speculation that Edibles will be the very fast-growing sellers at lawful sale shops
- Some resistant states only allow edibles
- Enforcement much harder on edibles
- Awaiting reliable survey # on edible sales

### What is at Steak? Is it Rare?

- Mantra: "Slower effect, harder to detect"
- Dissolve in intestines
- Absorbed through liver
- Blood stream carries CBD, THC to brain
- Not as impactful as smoke/vape intakes
- No rapid testing to find THC or CBD levels

# Less Likely to be Detected

- Enforcement is up to states, not by feds
- Easier to hide edible vs smoking or vaping
- No roadside breathalyzer equivalent
- Harder to determine individual Tolerance

# Verify Exact Content: Why?

- State may draw dividing lines
- Not yet full AOAC testing parameters
- Fix Specificity of analytical lab's methods
- Nature gives variable THC levels
- Need to discern Threshold for state laws
- Crime Lab: Beyond Reas Doubt PLUS specificity of the volume amount charged

# Verify exact content: Whom?

- Hard to find high quality testing labs
- Cannabis does not have AOAC norms
- Must know Recipe of the "raw ag comdty"
- Likely to be sophisticated players
- Unlikely to have retailers insisting on use of clear labeling terms

# Can Label Be Relied Upon?

- No!
- No FDA Rules re foods or re drugs
- No FDA audits or lab checkups
- No FTC Norms
- Not all states have rules on edible CBDs
- "Buyer beware"

#### And for Dessert...

- AG Sessions: "Good people don't smoke marijuana" (but they might chew it...)
- Federal system imprisons sellers
- Unclear how effective a deterrent a state is when state diminishes enforcement staffs
- Possible that sellers of legal THC products might ask states to take enforcement acts