

August 14, 2026

Twisted Growers LLC

MC281714

Dominick@DeMartinoInvestments.com

NOTICE: Shelf Audit Results and Intent to Limit Sales

In the interest of public health, safety, and welfare, the Massachusetts Cannabis Control Commission (“Commission”) performed a shelf-audit of the below Marijuana or Marijuana Product to confirm the accuracy of the labeled total THC. Consistent with the labeling requirements of 935 CMR 500.105(5) and 501.105(5), Licensees are required to affix information regarding the “full Cannabinoid Profile of the Marijuana contained within the package, including THC and other Cannabinoid levels” so that Consumers and Patients are informed of the cannabinoid content when making purchases. In determining whether the potency of a given Marijuana flower product is accurate, the Commission obtains a sample up to 1 ounce but in no instances less than 10 grams rounded to the nearest gram.

Verifying that Marijuana and Marijuana Products are accurately labeled is critical to the Commission’s mission of safely, equitably, and effectively enabling access to this industry as well as ensuring public health, safety, and welfare in accordance with G.L. cc. 94G and 94I. Please note, the Commission may also refer matters involving mislabeled Marijuana to the Attorney General’s Office’s Consumer Advocacy & Response Division, as needed.

WHY ARE YOU RECEIVING THIS NOTICE?

On May 21, 2026, the Commission obtained a sample of product available for consumption by the public and submitted it as a blind sample to the same ITL that provided the initial testing results. The Commission directed the ITL to homogenize the sample and take three random sub-samples for testing. The outcome of the Commission’s audit is below, a photograph of the product is included as Attachment A, and the associated Certificates of Analysis are included as Attachment B.

Cultivator Licensee:	Twisted Growers LLC
Cultivator License Number:	MC281714
Product Name:	M00003975923: Twisted Growers Cherry Lime Runtz Flower 3.5g
Product Type:	Buds
Test Sample Package Tag:	1A40A030000E5B1000004895
Batch:	1A40A030000E5B1000004575



RESULTS OF THE COMMISSION'S AUDIT:

Total THC¹	THCA	Δ9- THC	Audit #1 Total THC	Audit #2 Total THC	Audit #3 Total THC	Audit Average Total THC	% Deviation of Total THC
31.21	34.35	1.09	22.98	21.52	21.96	22.15	-29.02

The labeled potency of Marijuana flower is accurate if it falls within a range of $\pm 25\%$ from the average result of the Commission's audit. See [Bulletin | Auditing of Labeled Potency | May 22, 2026](#). Any results outside of that range do not adequately inform the public about the product they are purchasing and are substantially non-compliant with Commission law.

To account for the natural variation present in Marijuana flower, the Commission averages the three results and applies the following calculation to determine the statistical deviation of the average from the reported potency:

$$\blacksquare \quad \% \text{ deviation} = \frac{\text{average observed potency} - \text{reported potency}}{\text{reported potency}} \times 100\%$$

On June 23, 2026, the Commission received results of the audit and has determined that the average result of Marijuana sampled deviates more than $\pm 25\%$ from the labeled Total THC. As the product falls outside the expected values, the Marijuana is not in substantial compliance with Commission law, and an order to dispose of or limit sales of all products marketed with and derived from the labeled test results of the source package Metrc No. 1A40A030000E5B1000004575 is contemplated. See 935 CMR 500.330 and 501.330.

To facilitate further investigation, all existing Marijuana inventory in the Seed-to-Sale Electronic Tracking System with these test results will be placed on Administrative Hold. See 935 CMR 500.321 and 501.321. It is the responsibility of the Licensee who is receiving this Notice to inform any Licensees who have purchased any of the product that is subject to the Administrative Hold. For more information related to this Notice and the Administrative Hold, please see the next steps below.

WHAT ARE YOUR NEXT STEPS?

Pursuant to 935 CMR 500.330(2) and 501.330(2), the Licensee is afforded with a reasonable opportunity to take corrective action, which may include a voluntary recall of the Marijuana for:

¹ In the event the referenced product did not have Total THC represented on the label, the Commission utilized the Δ9-THC and THCa represented on the label to determine the Total THC deviation.

(i) relabeling with the Commission's average audit result; (ii) further processing of the Marijuana into a new Marijuana Product; or (iii) disposal. Please notify the Commission within seven (7) days of the date of this notice if the Licensee elects to pursue any of these options.

The Licensee may also notify the Commission of its desire to challenge the results of this audit within seven (7) days of the date of this notice.

After notifying the Commission of its desire to challenge the results, a Licensee shall follow the process outlined below:

1. Prepare two representative samples derived from the same production batch – Metrc No. 1A40A030000E5B1000004575 – and packaging format of the audited item. Each sample shall be equal to 0.5% of the total remaining product, up to 1 ounce but in no instance less than 10 grams rounded to the nearest gram. To the extent there is not enough of the product remaining, please contact the Commission. One sample will be submitted to the ITL that provided the initial test results and the other will be reserved for confirmatory testing at another ITL of the Licensee's choosing, if directed to by the Commission consistent with Step 6 below. The Licensee shall notify the Commission of the submission of these test samples.
2. Receiving ITLs will be instructed by the Commission to homogenize the sample and randomly select three separate sub-samples from the representative sample for testing. Any remaining product from the sample shall be maintained by the ITL for 30 days and may be collected by the Commission for further testing.
3. The Commission may elect to be present during either of the sample selection processes by the Licensee and/or ITLs. In all instances, the Licensee shall record and maintain video surveillance of the sampling event and create documentation as specified in Section 6.0 of the *Protocol for Analysis of Finished Marijuana and Marijuana Products*. Surveillance footage and documentation shall be submitted to the Commission upon request.
4. The ITL will be instructed to notify the Commission and Licensee of all potency results simultaneously.
5. If the average of these three results is consistent with the Commission's audit (*i.e.*, outside 25% of the originally labeled Total THC), then the Licensee shall relabel, dispose of, or further process the Marijuana into a new Marijuana Product. The Licensee shall notify the Commission of its decision in writing within three (3) days of receipt of these results.
 - a. If the Licensee chooses to relabel the Marijuana, the Licensee shall use the averages of the results from the Commission's audit. The Commission will direct the ITL to upload the new result and COA to Metrc.
6. If the average of these three results is inconsistent with the Commission's audit (*i.e.*, within 25% of the originally labeled total THC), then the Commission may direct the Licensee to submit the reserved sample to another ITL of the Licensee's choosing for confirmatory analysis. Confirmatory testing by the second ITL shall be conducted in the same manner specified in Step 2.
 - a. If the average of the confirmatory results by the second ITL is also inconsistent with the Commission's audit, the Commission will withdraw its Notice and Administrative Hold, and the Licensee may resume sales of the product.

- b. If the average of the confirmatory testing by the second ITL is consistent with the Commission's audit, then the Licensee shall relabel, dispose of, or further process the Marijuana into a new Marijuana Product. The Licensee shall notify the Commission of its decision in writing within three (3) business days of the receipt of these results.
 - i. If the Licensee chooses to relabel the Marijuana, the Licensee shall use the averages of the results from the second ITL. The Commission will direct the second ITL to upload the new average result and COA to Metrc.
- 7. The Licensee is responsible for all costs associated with this testing.

If you have questions associated with this notice, please contact the Commission at Enforcement@CCCMass.com.



Timothy Goodin, Enforcement Counsel
Cannabis Control Commission

Attachment A

Twisted Buds

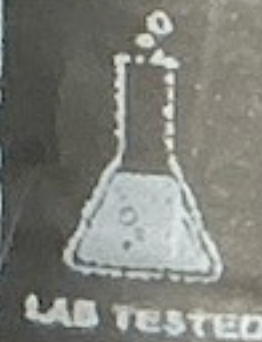


PREMIUM CRAFTED SIGNATURE RESERVE

Net WT. 0.123 oz (3.5g)

Cherry
Lime Runtz
Cannabis Flower
Net WT: 0.123 oz / 3.5g
Packaged: 4/23/2026
Tested: 4/20/2026

Scan QR For Full Results



Batch: TG Cherry Lime Runtz - 20260415 (A)

TAC:	37.49%
THC:	31.21%
THCA:	34.35%
d9THC:	1.09%
CBGA:	1.82%
CBG:	0.23%
THCVA:	0.00%
CBNA:	0.00%
CBD:	0.00%
CBDa:	0.00%
CBN:	0.00%

INDOOR ARTISAN CANNABIS
CRAFTED FOR CONNOISSEURS

Twisted

Buds



To learn more visit www.TwistedGrowers.com
Cultivated & Packaged by Twisted Growers LLC | License #
Phone: (774) 213-1115 | Email: info@TwistedGrowers.com

This product has not been analyzed or approved by the FDA. Limited information on the side effects of using this product may be associated health risks. Marijuana use during pregnancy or breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product.



"KEEP THIS PRODUCT AWAY FROM CHILDREN"
This product has been tested for contaminants and there were no adverse findings. No known allergens.

Attachment B



Cannabis Control Commission

2 Washington Square
Worcester, MA 01604
Geneive.Hall@cccmass.com

Certificate of Analysis

Final



Date Released: 6/23/2026 8:24:53AM

Report #: 147627

20260521-578-270-O A

Sample #: 203206, Weight: 10.00g, Unit Count:

Order #: X260618-0010

Category/Type: Raw Plant Material, Flower - Cured

Date Collected: 6/18/2026 11:47:16AM

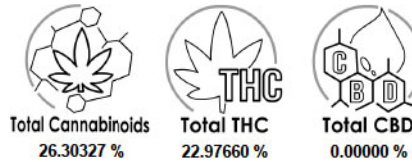
Date Received: 6/18/2026 12:27:28PM

Date Analyzed: 6/23/2026 8:08:42AM

METRC Sample ID: 20260521-578-270-O A

METRC Source Package ID: 20260521-578-270-O A

METRC Batch ID: 20260521-578-270-O A



Cannabinoids

Total Cannabinoids: 26.30327 %

Total THC: 22.97660 %

Total CBD: 0.00000 %

Date Completed: 06/23/2026 8:08AM

Analyst ID: B125893

Compound	CAS#	LOD (%)	LOQ (%)	%	mg/g	Relative Concentration
THCa	23978-85-0	.0528	.2105	25.31352	253.13525	
d9-THC	1972-08-3	.0651	.2105	0.77664	7.76639	
CBGA	25555-57-1	.0712	.2105	0.21311	2.13115	
d8-THC	5957-75-5	.0959	.2105	ND	ND	
CBD	13956-29-1	.0995	.2105	ND	ND	
CBDa	1244-58-2	.0672	.2105	ND	ND	
CBG	25654-31-3	.0887	.2105	<LOQ	<LOQ	
CBN	521-35-7	.0972	.2105	ND	ND	
CBC	20675-51-8	.0922	.2105	ND	ND	
THCV	31262-37-0	.0683	.2105	ND	ND	
CBDV	24274-48-4	.0646	.2105	ND	ND	
THCVa	39986-26-0	0.003524	.2105	<LOQ	<LOQ	

All data contained in this report has been reviewed for accuracy to ensure all quality control requirements are met and conform with ISO/IEC 17025:2017.

Report of this sample signifies successful receipt, preparation, and analytical analysis of the referenced sample without non-conformances or exceedances of QA/QC criteria which can be provided upon request. The information provided in this report is compliant with the methods utilized and is accurate and complete. Methods utilized for preparation and analysis are cited in each test section. Measurement uncertainty is maintained in accordance with ISO/IEC 17025 requirements and is available upon request.



GVA Labs
306 Race Street
Lower Level
Holyoke, MA 01040
833-482-5227
hello@gvalabs.com
gvalabs.com
License #: IL281359

Ross Franklin

Ross Franklin, Lab Director
6/23/2026 9:27:14AM



Cannabis Control Commission

2 Washington Square
Worcester, MA 01604
Geneive.Hall@cccmass.com

Certificate of Analysis

Final



Sample #: 203206

20260521-578-270-O A

Test Comment: Total THC = (THCa * 0.877) + d9THC

Total Cannabinoids = Addition of all cannabinoids with no multiplier

Total CBD = (CBDa * 0.877) + CBD

Analytical Method: HPLC Lab SOP: L-012 Cannabinoids

All data contained in this report has been reviewed for accuracy to ensure all quality control requirements are met and conform with ISO/IEC 17025:2017.

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6/23/2026 9:27:14AM



Cannabis Control Commission

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Certificate of Analysis

Final



Date Released: 6/23/2026 8:24:53AM

Report #: 147628

20260521-578-270-O B

Sample #: 203207, Weight: 10.00g, Unit Count:

Order #: X260618-0010

Category/Type: Raw Plant Material, Flower - Cured

Date Collected: 6/18/2026 11:47:16AM

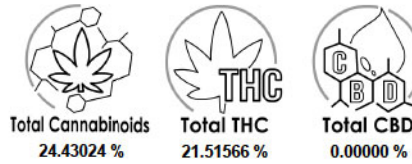
Date Received: 6/18/2026 12:27:29PM

Date Analyzed: 6/23/2026 8:08:42AM

METRC Sample ID: 20260521-578-270-O B

METRC Source Package ID: 20260521-578-270-O B

METRC Batch ID: 20260521-578-270-O B



Cannabinoids

Total Cannabinoids: 24.43024 %

Total THC: 21.51566 %

Total CBD: 0.00000 %

Date Completed: 06/23/2026 8:08AM

Analyst ID: B125893

Compound	CAS#	LOD (%)	LOQ (%)	%	mg/g	Relative Concentration
THCa	23978-85-0	.0528	.2105	23.69574	236.95736	
d9-THC	1972-08-3	.0651	.2105	0.73450	7.34496	
d8-THC	5957-75-5	.0959	.2105	ND	ND	
CBD	13956-29-1	.0995	.2105	ND	ND	
CBDa	1244-58-2	.0672	.2105	ND	ND	
CBG	25654-31-3	.0887	.2105	<LOQ	<LOQ	
CBN	521-35-7	.0972	.2105	ND	ND	
CBC	20675-51-8	.0922	.2105	ND	ND	
THCV	31262-37-0	.0683	.2105	ND	ND	
CBGA	25555-57-1	.0712	.2105	<LOQ	<LOQ	
CBDV	24274-48-4	.0646	.2105	ND	ND	
THCVa	39986-26-0	0.003524	.2105	<LOQ	<LOQ	

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6/23/2026 9:27:39AM



Cannabis Control Commission

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Certificate of Analysis

Final



Sample #: 203207

20260521-578-270-O B

Test Comment: Total THC = (THCa * 0.877) + d9THC

Total Cannabinoids = Addition of all cannabinoids with no multiplier

Total CBD = (CBDa * 0.877) + CBD

Analytical Method: HPLC Lab SOP: L-012 Cannabinoids

All data contained in this report has been reviewed for accuracy to ensure all quality control requirements are met and conform with ISO/IEC 17025:2017.

Report of this sample signifies successful receipt, preparation, and analytical analysis of the referenced sample without non-conformances or exceedances of QA/QC criteria which can be provided upon request. The information provided in this report is compliant with the methods utilized and is accurate and complete. Methods utilized for preparation and analysis are cited in each test section. Measurement uncertainty is maintained in accordance with ISO/IEC 17025 requirements and is available upon request.



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Ross Franklin, Lab Director
6/23/2026 9:27:39AM



Cannabis Control Commission

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Geneive.Hall@cccmass.com

Certificate of Analysis

Final



Date Released: 6/23/2026 8:24:53AM

Report #: 147629

20260521-578-270-O C

Sample #: 203208, Weight: 10.00g, Unit Count:

Order #: X260618-0010

Category/Type: Raw Plant Material, Flower - Cured

Date Collected: 6/18/2026 11:47:16AM

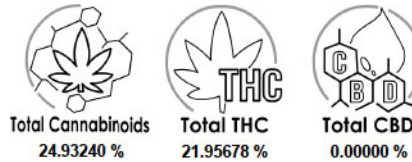
Date Received: 6/18/2026 12:27:30PM

Date Analyzed: 6/23/2026 8:08:42AM

METRC Sample ID: 20260521-578-270-O C

METRC Source Package ID: 20260521-578-270-O C

METRC Batch ID: 20260521-578-270-O C



Cannabinoids

Total Cannabinoids: 24.93240 %

Total THC: 21.95678 %

Total CBD: 0.00000 %

Date Completed: 06/23/2026 8:08AM

Analyst ID: B125893

Compound	CAS#	LOD (%)	LOQ (%)	%	mg/g	Relative Concentration
THCa	23978-85-0	.0528	.2105	24.19207	241.92075	
d9-THC	1972-08-3	.0651	.2105	0.74033	7.40326	
d8-THC	5957-75-5	.0959	.2105	ND	ND	
CBD	13956-29-1	.0995	.2105	ND	ND	
CBDa	1244-58-2	.0672	.2105	ND	ND	
CBG	25654-31-3	.0887	.2105	<LOQ	<LOQ	
CBN	521-35-7	.0972	.2105	ND	ND	
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THCV	31262-37-0	.0683	.2105	ND	ND	
CBGA	25555-57-1	.0712	.2105	<LOQ	<LOQ	
CBDV	24274-48-4	.0646	.2105	ND	ND	
THCVa	39986-26-0	0.003524	.2105	<LOQ	<LOQ	

All data contained in this report has been reviewed for accuracy to ensure all quality control requirements are met and conform with ISO/IEC 17025:2017.

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Ross Franklin, Lab Director
6/23/2026 9:27:50AM



Cannabis Control Commission

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Certificate of Analysis

Final



Sample #: 203208

20260521-578-270-O C

Test Comment: Total THC = (THCa * 0.877) + d9THC

Total Cannabinoids = Addition of all cannabinoids with no multiplier

Total CBD = (CBDa * 0.877) + CBD

Analytical Method: HPLC Lab SOP: L-012 Cannabinoids

All data contained in this report has been reviewed for accuracy to ensure all quality control requirements are met and conform with ISO/IEC 17025:2017.

Report of this sample signifies successful receipt, preparation, and analytical analysis of the referenced sample without non-conformances or exceedances of QA/QC criteria which can be provided upon request. The information provided in this report is compliant with the methods utilized and is accurate and complete. Methods utilized for preparation and analysis are cited in each test section. Measurement uncertainty is maintained in accordance with ISO/IEC 17025 requirements and is available upon request.



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