



## Certificate of Analysis (COA)

Report Number: 25-141308

Report Date : 03/31/2025

1169 Warner Ave, Tustin, CA, 92780 Phone:714-259-0384

Customer\* : RogersHood LLC

Contact\* :

Samples Received : 03/11/2025

Start of Testing : 03/11/2025

PO Number :

Phone\* :

Sample Name : Capsules

Item # :

Lot # : CB506

Lab # : 001

Test Code	Analysis - Method	Result	Spec
NC	Total Aerobic Microbial Count (Modified USP 2021)	140 CFU/G	N/A
NC	Coliform Count Petrifilm (AOAC 991.14)	<10 CFU/G	N/A
NC	Yeast Count (USP 2021)	80 CFU/G	N/A
NC	Mold Count (USP 2021)	10 CFU/G	N/A
USPC12	7 Method Bundle with Pseudomonas Modified USP 2021/2022	Completed	
NC	P. aeruginosa (USP 62)	Absent	N/A
NC	E. coli (Modified USP 2022)	Absent	N/A
NC	Salmonella species (Modified USP 2022)	Absent	N/A
NC	Staphylococcus aureus (Modified USP 2022)	Absent	N/A
PES06	Pesticide Screen (Modified USP 561)	Completed	
HMS35	Heavy Metal Screen 4 - ICPMS: As, Cd, Hg, Pb	Complete	
NC	Arsenic (As) ICP-MS	0.404 ppm	
NC	Cadmium (Cd) ICP-MS	0.296 ppm	
NC	Lead (Pb) ICP-MS	2.198 ppm	
NC	Mercury (Hg) ICP-MS	0.062 ppm	





## What is Prop65?

California has a uniquely strict disclosure law (Proposition 65), which requires a warning label when potential exposure to certain naturally occurring minerals may exceed 0.5 micrograms per day. This threshold is extremely low and is designed as a right-to-know disclosure, rather than a safety determination. Because a full daily serving of this product may exceed that 0.5 µg/day level, we include a Proposition 65 warning to remain fully compliant and transparent.

## What is the American Herbal Product Association (AHPA)?

AHPA provides guidance documents, policies, trade requirement, and reference materials to help members comply with the herbal industry laws and regulations. The organization's mission is to promote the responsible and sustainable commerce of herbal products to ensure consumers have informed access to a wide variety of safe herbal goods. Its vision is for high-quality herbal products to be readily accessible and broadly used by consumers. AHPA engages with federal regulatory agencies including the FDA, FTC, USDA, NIH, and Congress, as well as international bodies, to advocate for science-based policies and standards. It plays a key role in developing guidance policies, standards, and educational resources related to Good Manufacturing Practices (GMP), labeling, ingredient cleanliness, and regulatory compliance.



## Let's talk numbers! No fear mongering here.

Our 3rd-party test results	Results in PPM	PPM to µg (x .6gram capsule) Per capsule	AHPA	Prop65
Lead	2.198 ppm	1.3188 µg	6 µg/day (3µg/day for children)	.5 µg/day
Arsenic	0.404 ppm	0.2424 µg	10 µg/day	10 µg/day
Cadmium	0.296 ppm	0.1776 µg	4.1 µg/day	4.1 µg/day
Mercury	0.062 ppm	0.0372 µg	2 µg/day	0.3 µg/day

We have compared our numbers to California's Prop65 and the American Herbal Product Association (AHPA) to break down any fear and to fully understand what these testing results mean.

Converting parts per million (ppm) to micrograms (µg) in a powder sample depends on the total mass of the sample. For solid materials like powders, ppm is typically expressed as micrograms of a substance per gram of the sample (µg/g), which means that 1 ppm is equivalent to 1 microgram per gram. (1 Cinnabin capsule having .6g of powder).

**Now we can properly compare the test result numbers to what each organization's daily limits are.**

Lead is above Prop65 limits, however this doesn't mean it is an unsafe product. Learn more about Prop65 at the OEHHA.CA.GOV website.

Lead is below the AHPA standard of 6µg/day for adults and 3µg/day for children.

**All other heavy metal results are below AHPA and Prop65 limits.**



## **Now lets talk Parts Per Million (PPM).**

PPM RESULTS	Our results	AHPA	AHPA to PPM ( $\mu$ g/0.6g)	Prop65	Prop65 to PPM ( $\mu$ g/0.6g)
Lead	2.198 ppm	6 $\mu$ g/day	10 ppm	.5 $\mu$ g/day	0.833 ppm
Arsenic	0.404 ppm	10 $\mu$ g/day	16.66 ppm	10 $\mu$ g/day	16.66 ppm
Cadmium	0.296 ppm	4.1 $\mu$ g/day	6.833 ppm	4.1 $\mu$ g/day	6.833 ppm
Mercury	0.062 ppm	2 $\mu$ g/day	3.33 ppm	0.3 $\mu$ g/day	.5 ppm

We've converted our numbers to  $\mu$ g so now lets convert the organization's daily limits to PPM and then PPB so we can see how the numbers truly align.

Converting parts per million (ppm) to micrograms ( $\mu$ g) in a powder sample depends on the total mass of the sample. For solid materials like powders, ppm is typically expressed as micrograms of a substance per gram of the sample ( $\mu$ g/g), which means that 1 ppm is equivalent to 1 microgram per gram. (1 Cinnabin capsule having .6g of powder). We'll do opposite to get PPM per daily limit.

The data still shows consistency in the numbers showing same results when results were in  $\mu$ g (micrograms).

For further transparency and understanding, we will convert these numbers to PPB (parts per billion), the numbers may be the larger but the results stay the same.



## Finally, lets talk Parts Per Billion (PPB).

PPB RESULTS	Our results PPM	Our results PPB (ppm*1000)	AHPA to PPM ( $\mu$ g/0.6g)	AHPA to PPB ( $\mu$ g/ (.6g cap)*1000	Prop65 to PPM ( $\mu$ g/0.6g)	Prop65 to PPB ( $\mu$ g/ (.6g cap)*1000
Lead	2.198 ppm	2,198 ppb	10 ppm	10,000 ppb	0.833 ppm	833 ppb
Arsenic	0.404 ppm	404 ppb	16.66 ppm	16,667 ppb	16.66 ppm	16,667 ppb
Cadmium	0.296 ppm	296 ppb	6.833 ppm	6,833 ppb	6.833 ppm	6,833 ppb
Mercury	0.062 ppm	62 ppb	3.33 ppm	3,333 ppb	.5 ppm	500 ppb

If we want to look at the results in PPB, we have to take PPM, and multiply by 1000.

Lead is still consistent with being over the Prop65 limit and still much lower than the AHPA limits.

Test results don't have to be scary, they have to be interpreted and analyzed correctly along with doing the correct calculations to display the actual limit amounts if needing them in a different unit.

### **Key Takeaways:**

- Prop 65 warnings are about disclosure, not danger.
- AHPA limits are safety-based and more representative of acceptable daily exposure.
- The product's test results are consistent, transparent, and within AHPA safety standards.
- Test data should be interpreted carefully using correct unit conversions, rather than taken at face value in isolation.



# References and Resources

- [https://www.ahpa.org/ahpa\\_guidance\\_policies](https://www.ahpa.org/ahpa_guidance_policies)  
(look under heavy metals tab for limits)
- [https://www.ahpa.org/california\\_prop\\_65\\_faq](https://www.ahpa.org/california_prop_65_faq)
- <https://oehha.ca.gov/proposition-65/chemicals/lead>
- <https://oehha.ca.gov/proposition-65/chemicals/cadmium-and-cadmium-compounds>
- <https://oehha.ca.gov/chemicals/cadmium>
- <https://oehha.ca.gov/chemicals/mercury-inorganic>
- <https://newwavescientific.com/2024/09/01/navigating-prop-65-compliance-for-lead-arsenic-cadmium-mercury-ensuring-product-safety/>