

Kratom Compliance Review Florida

August 28, 2026 | 9:44:32 AM



Compliant
All reviewed requirements passed.

● Passing

32

● Needs Attention

0

● Critical

0

REVIEW SUMMARY

STATE

FLORIDA

SUBSTANCE

KRATOM

COMPANY NAME

MOON WALKER

PRODUCT TYPE

CHOCOLATE

PRODUCT NAME

BING CHERRY

COMPLIANCE STATUS

COMPLIANT

SKU

—

PRODUCT IMAGES

Bing Cherry_Back.pdf

Bing Cherry_Front.pdf

CERTIFICATE OF ANALYSIS (COA)

COA BING CHERRY.pdf

FINDINGS

● Passing

1. Statement of Identity

Rule Summary: The label must state what the product is on the principal display panel; where it is described as a dietary supplement.

Suggested Fix: The front panel states "KRATOM EXTRACT" as the statement of identity, and also labels the product "DIETARY SUPPLEMENT."

Ref: 21CFR101.3/21CFR101.3(g)

2. Net Quantity of Contents

Rule Summary: Net quantity must appear on the principal display panel in the bottom 30 percent, in both unit systems where a weight is used.

Suggested Fix: The front panel shows "4x Chewable Tablets" and "250 MG PER TABLET | 1000 MG TOTAL" a net quantity statement in both metric and US customary units (e.g., "1000 mg (0.035 oz)") in the bottom 30% of the front panel should be added.

Ref: 21CFR101.7

3. Facts Panel

Rule Summary: The product must bear a Supplement Facts panel if marketed as a supplement, or a Nutrition Facts panel if marketed as a conventional food.

Suggested Fix: The Supplement Facts panel is present with serving size and servings per container. Remove the "Key Ingredients" header from the left column, leaving ingredient names unheaded, and keep "Amount Per Serving" as the sole header on the right column; move "Batch Number" and "Expiration Date" out of the Supplement Facts box and onto the panel below it, near the barcode.

Ref: 21CFR101.9/21CFR101.36

4. 7-OH Concentration Declaration in PPM

Rule Summary: The label must declare the 7-OH concentration in parts per million on a dry weight basis.

Evidence: The label lists 7-Hydroxymitragynine at 299 PPM, but prints "ON DRY WEIGHT BASES" instead of "basis," and this appears under an "Amount Per Serving" column, not clearly tied to net contents.

Suggested Fix: Passing with recommendation. Spelling error override fix on next run. Also, passing with recommendation on the mg/g required by the new rule 5KE26-11 is currently not strictly enforced for the first 60 says – compliant until October 23, 2026. From there, this requirement can be added to the QR code. Restate the 7-Hydroxymitragynine concentration in mg/g (dry-weight basis) as required by 5KER26-11 (1) — per the COA (299.16 ppm dry-weight), that converts to approximately 0.299 mg/g. Do not use “Net contents” as the lead-in wording for this disclosure, since “net contents” already has a distinct meaning under the Net Quantity of Contents requirement (Critical Finding 2, above) and reusing it here risks conflating two different disclosures

Ref: 5KER26-1(1)/5KER26-1(2)(b)

5. Directions for Use

Rule Summary: The label should carry directions or a recommended use statement.

Suggested Fix: Add the heading "Directions:" before the usage instructions, e.g., "Directions: Take 1/4 tablet (62.5 mg). Do not exceed one serving every 48 hours."

Ref: FED-Directions-Recommended

6. Addiction Disclaimer

Rule Summary: The label should disclose that kratom alkaloids may have habit-forming potential.

Suggested Fix: Add, in its own clearly separated paragraph: “WARNING: This product contains kratom alkaloids that may have habit-forming potential. Prolonged or high-dose use may lead to tolerance, dependence, addiction, withdrawal symptoms, or serious injury. Not intended for long-term or daily use. Use only as directed.”

Ref: FL-WarningStatements-AddictionDisclaimer-Recommended

7. Do Not Combine With Alcohol Warning

Rule Summary: The label should warn against combining the product with alcohol, medicine or other intoxicants.

Suggested Fix: Add “Do not use this product with alcohol, medicine, or other intoxicating substances.”

Ref: FL-WarningStatements-DoNotCombineAlcohol-Recommended

8. FDA Disclaimer

Rule Summary: The label must carry the FDA disclaimer, prefixed 'FDA Disclaimer:', on its own line separate from other warnings.

Suggested Fix: Replace the current single-sentence FDA Disclaimer with: “FDA Disclaimer: These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure, or prevent any disease.”

Ref: FL-WarningStatements-FDADisclaimer

9. Poison Control Statement

Rule Summary: The label should direct consumers to Poison Control at 1-800-222-1222 if an adverse reaction occurs.

Suggested Fix: Add “In case of adverse reactions, seek immediate medical attention or contact a Poison Control Center at 1-800-222-1222.”

Ref: FL-WarningStatements-PoisonControl-Recommended

10. Responsible Use and Misuse Disclaimer

Rule Summary: The label should carry a responsible-use or misuse disclaimer that limits liability to misuse rather than waiving it for all use.

Suggested Fix: The Legal Disclaimer states: "you assume full responsibility for any adverse events and/or health complications that may result from its use" — a blanket waiver not tied to misuse, which may be deemed unenforceable or replace the current Legal Disclaimer sentence with the short-form wording: “Notice: Use only as directed. The manufacturer and distributor are not responsible for effects resulting from misuse or use inconsistent with labeled instructions.”

Ref: FL-WarningStatements-ResponsibleUseMisuse-Recommended

11. Side Effects Warning

Rule Summary: The label should warn of possible side effects such as nausea, dizziness, drowsiness and withdrawal symptoms.

Suggested Fix: Add a side-effects warning such as: 'Use of this product may cause nausea, dizziness, drowsiness or sedation, agitation, anxiety, hallucinations, breathing problems, rapid heart rate, seizures, and withdrawal symptoms.'

Ref: FL-WarningStatements-SideEffects-Recommended

12. Minimum Type Height and Contrast

Rule Summary: Required label text must be at least one-sixteenth of an inch high, no more than three times as high as wide, with sufficient contrast.

Evidence: No dieline or artwork specification stating type size was supplied, and physical type height cannot be measured from a flat digital image.

Ref: 21CFR101.2

13. Ingredient List

Rule Summary: Ingredients must be listed by common name in descending order of predominance by weight, with allergens declared.

Evidence: The back panel lists "Other Ingredients: Microcrystalline Cellulose, Dicalcium Phosphate, Dextrose Monohydrate, Natural Flavoring, Silicone Dioxide, Sucralose, Magnesium Stearate" using common/usual names.

Ref: 21CFR101.4

14. Name and Place of Business

Rule Summary: The label must conspicuously state the name and full street address of the manufacturer, packer or distributor.

Evidence: The label lists "Manufactured for: Moon Walker LLC, 8 The Green Ste B, Dover DE 19901," providing a full street address with the required relationship term.

Ref: 21CFR101.5

15. Major Food Allergen Declaration

Rule Summary: Any major food allergen present must be declared by its common or usual name.

Evidence: The ingredient list (Other Ingredients) shows no major food allergen named, so no allergen declaration is required.

Ref: 21USC343(w)

16. Conspicuous Placement of 7-OH Concentration

Rule Summary: The 7-OH concentration must be clear and conspicuous and not placed solely on the bottom of the container.

Evidence: The 7-Hydroxymitragynine concentration (299 PPM) appears on the supplement facts panel, not the bottom, clear of artwork and set against a contrasting background.

Ref: 5KER26-1(2)(c)

17. Pseudoindoxyl Isomer Declaration

Rule Summary: Where the lab report shows pseudoindoxyl present, its concentration must be declared on the label.

Evidence: The COA does not report pseudoindoxyl at all, so the declaration requirement is not triggered.

Ref: 5KER26-1(3)

18. Storage Instructions

Rule Summary: The label should carry a storage instruction such as store in a cool, dry place.

Evidence: The label states "Store in a cool, dry place away from direct sunlight" in the Usage Guidelines section.

Ref: FED-StorageInstructions-Recommended

19. Age 21 and Underage Use Warning

Rule Summary: The label should restrict purchase and use to persons 21 or older and tell consumers to keep the product away from children.

Evidence: The label states "For adults 21+ only. Keep out of reach of children," satisfying both the age restriction and underage warning elements.

Ref: FL-21PlusWarning-Recommended/FL-WarningStatements-UnderageUse-Recommended

20. PPM and MDL Statement Beneath Fact Panel

Rule Summary: Where 7-OH is non-detect or near the method detection limit, a supplemental PPM and MDL statement should appear beneath the fact panel.

Evidence: The 7-Hydroxymitragynine result is listed at 299 PPM, a quantified value at or above detection level, so this near-MDL supplemental disclosure rule does not apply.

Ref: FL-7OH-WordingBeneathFactPanel-Recommended

21. 7-OH 400 PPM Controlled Substance Threshold

Rule Summary: A kratom product may not contain 7-OH above 400 parts per million on a dry weight basis.

Evidence: The COA reports 7-Hydroxymitragynine on a dry-weight basis at 299.16 ppm, which is below the 400 PPM legacy threshold.

Ref: FL-893.03(1)(a)-7OH-400ppmThreshold

22. Batch Number

Rule Summary: The label should display a batch number identifying the production lot.

Evidence: The label displays a Batch Number "027101005BC" on the supplement facts panel.

Ref: FL-BatchNumber-Recommended

23. QR Code Linking to COA

Rule Summary: The label should carry a scannable QR code linking to a COA confirming 7-OH below 400 PPM.

Evidence: A QR code is printed on the back panel near the manufacturer contact information.

Ref: FL-COA-QRCode-Recommended

24. Company or Brand URL

Rule Summary: The label should display a URL for the company or brand.

Evidence: The label displays the email/web contact "contact@moonwalkerkratom.com" on the information panel.

Ref: FL-CompanyURL-Recommended

25. Expiration Date

Rule Summary: The label should display an expiration date.

Evidence: The label displays an Expiration Date of 12/2028 in the supplement facts panel.

Ref: FL-ExpirationDate-Recommended

26. Consult Healthcare Professional Warning

Rule Summary: The label should tell consumers to consult a healthcare professional before use.

Evidence: The Safety & Legal Disclaimer states "Consult your healthcare provider before use, especially if you have medical conditions or are taking medication," satisfying the requirement.

Ref: FL-WarningStatements-ConsultMedical-Recommended

27. Do Not Exceed Serving Warning

Rule Summary: The label should warn not to exceed the recommended serving and note that effects may be delayed.

Evidence: The Usage Guidelines state "Consume no more than one serving every 48 hours. Effects may be delayed by up to two hours," conveying the required warning.

Ref: FL-WarningStatements-DoNotExceedServing-Recommended

28. Warning Statement Presentation

Rule Summary: Warning statements should be legible, substantive, and not defer to a website for full disclaimers.

Evidence: The label states substantive warnings on-panel, including "For adults 21+ only. Keep out of reach of children. Not a food product" and related safety text, without directing consumers to a website for full disclaimers.

Ref: FL-WarningStatements-General-Recommended

29. Machinery Use Warning

Rule Summary: The label should warn against driving or operating machinery after use.

Evidence: The Safety & Legal Disclaimer states "Do not use if pregnant, nursing, or operating heavy machinery," conveying the required warning against operating machinery after use.

Ref: FL-WarningStatements-MachineryUse-Recommended

30. Pregnancy and Nursing Warning

Rule Summary: The label should warn against use during pregnancy or nursing, or with medication or a medical condition.

Evidence: The Safety & Legal Disclaimer states "Do not use if pregnant, nursing, or operating heavy machinery," which conveys the required pregnancy/nursing caution.

Ref: FL-WarningStatements-PregnancyNursing-Recommended

31. 7-OH 400 PPM Controlled Substance Threshold

Rule Summary: A kratom product may not contain 7-OH above 400 parts per million on a dry weight basis.

Evidence: The COA reports 7-Hydroxymitragynine on a dry-weight basis at 299.16 ppm, below the 400 ppm limit, with a PASS status noted.

Ref: FL-893.03(1)(a)-7OH-400ppmThreshold

32. Alkaloid Ratio Not Disclosed

Rule Summary: Passing with recommendation as the new rule 5KER26-11 is currently not strictly enforced for the first 60 days - compliant until October 23, 2026. From there, this requirement can be added to the QR code. The rule requires every label, regardless of 7-oh level, to state the mitragynine-to-7-oh alkaloid ratio in mg, as a whole integer (e.g., "alkaloid ratio 120 mg:1 mg").

Evidence: Neither the front nor back panel supplied contains an “alkaloid ratio” statement anywhere. The coa reports mitragynine at 107.81 mg/serving and 7-hydroxymitragynine at 0.17 mg/serving, which would compute to an approximate ratio of 634 mg : 1 mg (rounded up) — comfortably above the 100:1 minimum — but no such statement appears on the label as supplied.

Suggested Fix: Add a standalone “alkaloid ratio [mitragynine mg]:[7-oh mg]” statement to the label, e.g., “alkaloid ratio 634 mg:1 mg” (subject to counsel/lab confirmation of the rounding Convention).

REVIEWED FILES

Bing Cherry_Back.pdf

Product Label 192.1 KB

3.75"

5.5"

MOON WALKER

SUPPLEMENT FACTS

Serving Size: ¼ Tablet 62.5 mg
Servings per Container: 16

Key Ingredients	Amount Per Serving
Mitragyna Speciosa	62.5 mg
Mitragynine	30 mg
Other Alkaloids	<1%
7-Hydroxymitragynine	299 parts per million (PPM) ON DRY WEIGHT BASES
Batch Number	027101005BC
Expiration Date	12/2028

Other Ingredients:

Microcrystalline Cellulose, Dicalcium Phosphate, Dextrose Monohydrate,
Natural Flavoring, Silicone Dioxide, Sucralose, Magnesium Stearate.

Product Description: Tablets are made from premium Mitragyna Speciosa leaf extract, offering a refined and balanced formulation. Designed for adult use only, this product is not intended for daily consumption and should be used responsibly.

Usage Guidelines: Consume no more than one serving every 48 hours. Effects may be delayed by up to two hours. Store in a cool, dry place away from direct sunlight.

Safety & Legal Disclaimer: For adults 21+ only. Keep out of reach of children. Not a food product. Not intended to diagnose, treat, cure, or prevent any disease. Consult your healthcare provider before use, especially if you have medical conditions or are taking medication. Do not use if pregnant, nursing, or operating heavy machinery. Manufacturer and resellers assume no liability for misuse of this product.

FDA Disclaimer: These products and statements have not been evaluated by the FDA and are not intended to diagnose, treat, cure, or prevent any disease.

Legal Disclaimer / Liability Disclaimer: By using this product, you assume full responsibility for any adverse events and/or health complications that may result from its use. Manufacturer/reseller assumes no liability for the misuse of this product.



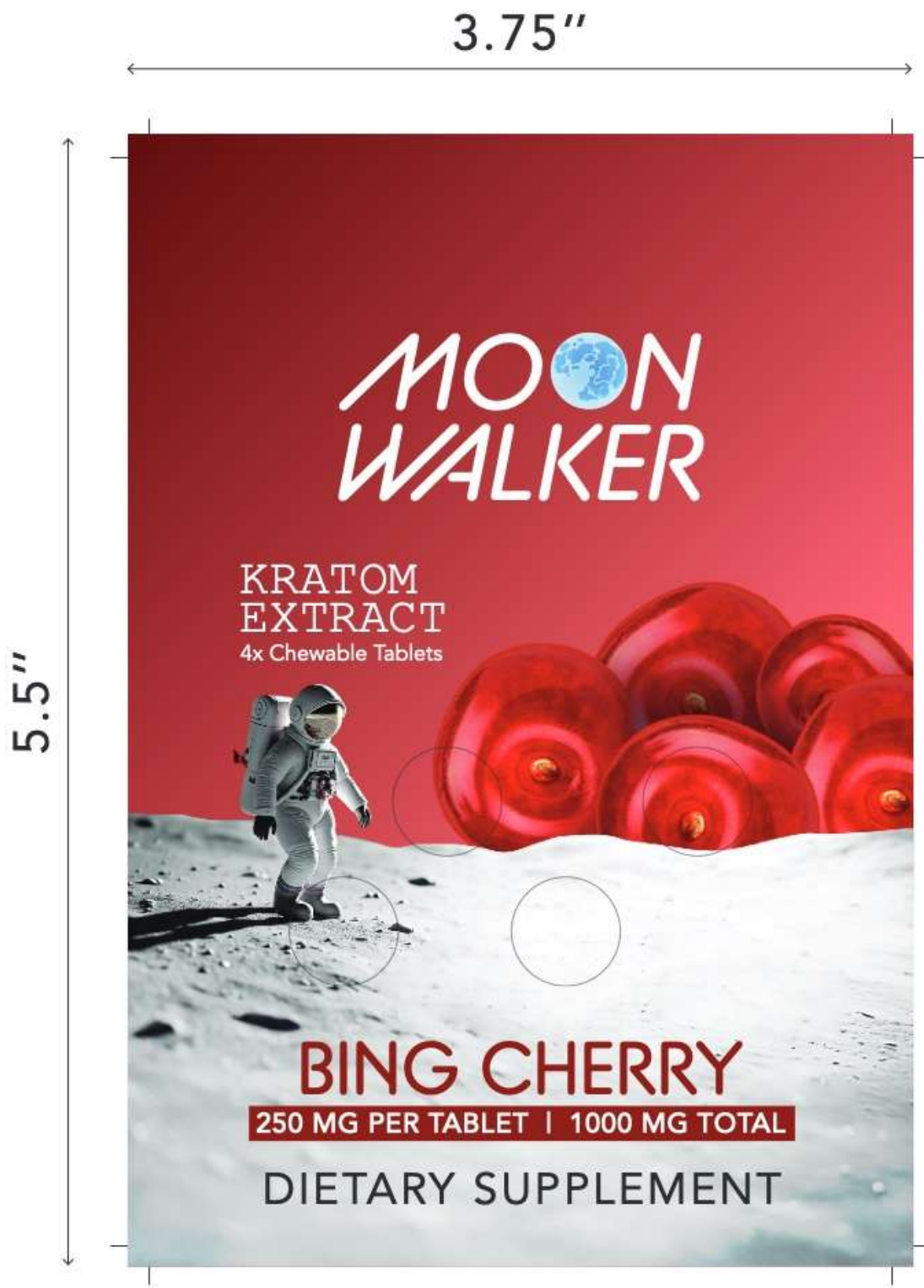
Manufactured for:
 Moon Walker LLC
 8 The Green Ste B
 Dover DE 19901
contact@moonwalkerkratom.com



7 02940 82123 2

Bing Cherry_Front.pdf

Product Label 151.7 KB



COA BING CHERRY.pdf

Certificate of Analysis (COA) 529.2 KB

Certificate of Analysis

Sample Name: MOON WALKER KRATOM CHEWABLE TABLET 250MG BING CHERRY

Client: Moon Walker Bota LLC

Sample Code: DTS-251212-018

Matrix Name: Pill - Tablet

Type / Result: Quality Assurance - Pass



Received Date: Mon, Dec 15, 2025

Published Date: Thu, Dec 18, 2025

Batch/Lot Code: 027101005BC

Batch Size: 5.9kg

Sample Size: 590mg

Average Unit Weight: 0.590425g

RESULT SUMMARY

Mitragynine	107.81 mg /serv
Total Major Alkaloids	115.77 mg /serv

ALKU Kratom Alkaloids High Level	ALKL Kratom Alkaloids Low Level	MOS Moisture Content Loss on Drying	7OHFL 7-Hydroxymitragynine Florida
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Approvals

RESULTS REVIEWED BY:

Leslie Varela
Laboratory Director

Cambium Analytica
Thursday, Dec 18, 2025

RESULTS CERTIFIED BY:

Douglas Smith
VP - Scientific Operations

Cambium Analytica
Thursday, Dec 18, 2025

This report may not be reproduced except in full without approval from Cambium Analytica. The results herein relate only to the sample & batch identified in this report.

Lab Information

Address: 1230 Woodmere Ave, Traverse City, MI 49686 **Phone:** 231.252.3669 **Accreditation:** ISO/IEC 17025:2017 – #108157



DTS-251212-018

2/2

ALKU

Kratom Alkaloids - High Level

LAB-TM-052 - Determination of Kratom Alkaloid Content by UPLC-DAD
ALKU-DTS-251212-018-01 - TUE, DEC 16, 2025

Analyte	Value	Value (mg/g)	Per Serving	Per Package	Action Limit	LOD	LOQ	Status
Mitragynine	18.2589 %	182.5893 mg/g	107.81 mg	107.81 mg	N/A	0.3 ug/g	0.5 ug/g	N/A
Paynantheine	0.8037 %	8.0372 mg/g	4.75 mg	4.75 mg	N/A	0.3 ug/g	0.5 ug/g	N/A
Speciogynine	0.4227 %	4.2274 mg/g	2.50 mg	2.50 mg	N/A	0.3 ug/g	0.5 ug/g	N/A
Speciociliatine	0.1228 %	1.2278 mg/g	0.72 mg	0.72 mg	N/A	0.3 ug/g	0.5 ug/g	N/A
Total Major Alkaloids*	19.6082 %	196.0818 mg/g	115.77 mg	115.77 mg	N/A	N/A	N/A	N/A

*Total Major Alkaloids is calculated as the sum of Mitragynine, Paynantheine, Speciociliatine and Speciogynine.

ALKL

Kratom Alkaloids - Low Level

LAB-TM-047 - Determination of Kratom Alkaloid Content by LC-TQ
ALKL-DTS-251212-018-01 - WED, DEC 17, 2025



Analyte	Value	Value (mg/g)	Per Serving	Per Package	Action Limit	LOD	LOQ	Status
7-Hydroxymitragynine	0.02854 %	0.28536 mg/g	0.17 mg	0.17 mg	N/A	0.002 ug/g	0.011 ug/g	N/A
Mitraphylline	0.00026 %	0.00257 mg/g	0.00 mg	0.00 mg	N/A	0.004 ug/g	0.019 ug/g	N/A
Total Minor Alkaloids*	0.02879 %	0.28794 mg/g	0.17 mg	0.17 mg	N/A	N/A	N/A	N/A

*Total Minor Alkaloids is calculated as the sum of 7-Hydroxymitragynine and Mitraphylline.

MOS

Moisture Content - Loss on Drying

LAB-TM-008 - Loss on Drying
MOS-DTS-251212-018-01 - THU, DEC 18, 2025



Analyte	Value	Action Limit	LOD	LOQ	Status
Moisture	4.60 %	N/A	N/A	N/A	N/A

7OHFL

7-Hydroxymitragynine - Florida - Dry-Weight Basis

7-Hydroxymitragynine - (Florida — Dry-Weight Basis)
7OHFL-DTS-251212-018-01 - THU, DEC 18, 2025

Analyte	Value	Action Limit	LOD	LOQ	Status
7-Hydroxymitragynine - As Received*	285.40 ppm	N/A	N/A	N/A	N/A
7-Hydroxymitragynine - Dry-Weight*	299.16 ppm	400 ppm	N/A	N/A	PASS
Moisture (%) by Input*	4.60 %	N/A	N/A	N/A	N/A

*7-Hydroxymitragynine - As Received: The "As Received" value represents the concentration of 7-hydroxymitragynine, expressed in parts per million (ppm), as reported in the Kratom Alkaloids - Low Level test. This corresponds to the measured percentage of 7-hydroxymitragynine in the sample as received.

*7-Hydroxymitragynine (Dry-Weight Basis): The dry weight concentration of 7-hydroxymitragynine is calculated using the following formula: Dry Weight 7-Hydroxymitragynine (ppm) = 7-Hydroxymitragynine (ppm) x (100 / (100 - Moisture by Input (%)))

*The Moisture (%) by Input result may represent either a client-provided input or a value measured by Cambium. This value is incorporated into associated calculated analytes for reporting purposes.





Review critical findings before resubmitting packaging materials.