

Kratom Compliance Review Florida

September 3, 2026 | 2:59:44 PM



Compliant
 All reviewed requirements passed.

● Passing

32

● Needs Attention

0

● Critical

0

REVIEW SUMMARY

STATE	SUBSTANCE
FLORIDA	KRATOM
COMPANY NAME	PRODUCT TYPE
MOON WALKER	CHOCOLATE
PRODUCT NAME	COMPLIANCE STATUS
STRAWBERRY LEMONADE	COMPLIANT
SKU	
—	
PRODUCT IMAGES	CERTIFICATE OF ANALYSIS (COA)
Strawberry Lemonade Front.pdf	COA-STRAWBERRY-LEMONADE.pdf
Strawberry Lemonade Back.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, that carries Chapter 500 and Part 111 obligations.

Evidence: The front panel states "Kratom Extract" and separately 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.

Evidence: The principal display panel shows "4x Chewable Tablets" and "250 MG PER TABLET | 1000 MG TOTAL" but no net quantity statement (weight or count) appears anywhere on the panel.

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.

Evidence: The Supplement Facts panel is present with serving size, servings per container, and per-serving amounts, but the column is headed "Key Ingredients / Amount Per Serving" instead of the required "Amount Per Serving" alkaloid disclosure format, and it also lists Batch Number and Expiration Date inside the fact box.

Ref: 21CFR101.9/21CFR101.36

4. Alkaloid Ratio Declaration

Rule Summary: The label must state the alkaloid ratio as 'Alkaloid Ratio X mg : Y mg' in whole integers.

Suggested Fix: Add the statement 'Alkaloid Ratio [X] mg : [Y] mg' to the supplement facts panel with whole-integer values.

Ref: 5KER26-9(4)

5. Conspicuous Placement of Concentrations and Ratio

Rule Summary: The concentrations and alkaloid ratio must be permanently affixed, clear and conspicuous, and not solely on the bottom of the container.

Evidence: The 7-Hydroxymitragynine concentration (391 PPM) appears on the supplement facts panel, not the bottom, clear of artwork and set against a contrasting background.

Ref: 5KER26-9(5)

6. Directions for Use

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

Suggested Fix: Add a "Directions:" heading, e.g. "Directions: Chew 1/4 tablet, drink water, reseal package. Wait 2 hours to assess effects before taking more."

Ref: FED-Directions-Recommended

7. Company or Brand URL

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

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

Ref: FL-CompanyURL-Recommended

8. 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

9. 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 a warning such as "Do not use this product with alcohol, medicine, or other intoxicating substances."

Ref: FL-WarningStatements-DoNotCombineAlcohol-Recommended

10. FDA Disclaimer

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

Suggested Fix: Split into two sentences: "These statements have not been evaluated by the FDA. This product is not intended to diagnose, treat, cure, or prevent any disease."

Ref: FL-WarningStatements-FDADisclaimer

11. Machinery Use Warning

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

Evidence: The label states "Do not use if pregnant, nursing, or operating heavy machinery" but contains no statement warning against driving or that ability may be impaired.

Ref: FL-WarningStatements-MachineryUse-Recommended

12. 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" as a passing recommendation, not a requirement.

Ref: FL-WarningStatements-PoisonControl-Recommended

13. 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.

Evidence: The label's Legal Disclaimer states "you assume full responsibility for any adverse events and/or health complications" from use, waiving liability regardless of how the product is used - a blanket waiver that may be unenforceable.

Ref: FL-WarningStatements-ResponsibleUseMisuse-Recommended

14. 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: Type height cannot be measured from a flat digital image, and no dieline or artwork specification stating type size below 1/16 inch was supplied.

Ref: 21CFR101.2

15. Ingredient List

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

Evidence: An "Other Ingredients" list is present on the same panel as the manufacturer name and address, naming components like Microcrystalline Cellulose and Dicalcium Phosphate by common name, but the descending order of predominance by weight cannot be confirmed from the label.

Ref: 21CFR101.4

16. Manufacturer Conformance

Rule Summary: Manufacturers of kratom products are subject to Chapter 500, F.S. and 21 C.F.R. 111.

Evidence: Manufacturing conformance with Chapter 500, F.S. and 21 C.F.R. 111 cannot be determined from label content alone; this requires confirmation from records or inspection.

Ref: 5K-4.030(3)(c)

17. Dietary Supplement Conformance

Rule Summary: A kratom product labeled as a dietary supplement is subject to Chapter 500, F.S. and 21 C.F.R. 111.

Evidence: The label states "DIETARY SUPPLEMENT" on the front panel, so the product is subject to Chapter 500, F.S. and 21 C.F.R. 111. Confirm conformance with your manufacturer.

Ref: 5K-4.030(3)(d)

18. 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," which includes the company name, full street address, and required relationship term.

Ref: 21CFR101.5

19. Major Food Allergen Declaration

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

Evidence: The ingredient list (Microcrystalline Cellulose, Dicalcium Phosphate, Dextrose Monohydrate, Natural Flavoring, Silicone Dioxide, Sucralose, Magnesium Stearate) names no major food allergen.

Ref: 21USC343(w)

20. Mitragynine Ratio

Rule Summary: The product must contain at least 100 parts mitragynine for every 1 part of the combined seven listed compounds, by mass.

Evidence: The COA shows mitragynine at 190.71 mg/g and 7-Hydroxymitragynine (the only listed compound tested) at 0.375 mg/g, giving a ratio of about 508:1, above the required 100:1.

Ref: 2ER26-1-MitragynineRatio

21. Disease Claims

Rule Summary: The label and advertising must not claim the product diagnoses, cures, mitigates, treats or prevents disease.

Evidence: No disease claims appear; the label only states the product is "not intended to diagnose, treat, cure, or prevent any disease," which is a negative statement, not a claim.

Ref: 5K-4.030(3)(b)

22. 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" under Usage Guidelines, satisfying the storage instruction requirement.

Ref: FED-StorageInstructions-Recommended

23. 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

24. Batch Number

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

Evidence: The label displays a Batch Number of "027101007SL" on the supplement facts panel.

Ref: FL-BatchNumber-Recommended

25. Directions and Serving Size

Rule Summary: Directions should give a recommended serving size and safe-consumption time frame, and should not use the word 'dose'.

Evidence: The label gives usage directions with a serving size and time frame: "Consume no more than one serving every 48 hours," with no use of the word "dose."

Ref: FL-Directions-ServingSize-Recommended

26. Expiration Date

Rule Summary: The label should display an expiration date.

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

Ref: FL-ExpirationDate-Recommended

27. QR Code Linking to COA

Rule Summary: The label should carry a scannable QR code linking to a COA reporting the seven compounds and mitragynine.

Evidence: A real QR code is present on the information panel next to the manufacturer contact details.

Ref: FL-Kratom-QRCode-COA-Recommended

28. Consult Healthcare Professional Warning

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

Evidence: The information panel 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

29. 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," which conveys the substance of warning against exceeding recommended use.

Ref: FL-WarningStatements-DoNotExceedServing-Recommended

30. 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 the panel itself, including "For adults 21+ only. Keep out of reach of children... Consult your healthcare provider before use," rather than directing to a website.

Ref: FL-WarningStatements-General-Recommended

31. 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 label states "Do not use if pregnant, nursing, or operating heavy machinery," which cautions against use during pregnancy or nursing.

Ref: FL-WarningStatements-PregnancyNursing-Recommended

32. 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 391.24 ppm, below the 400 ppm limit.

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

REVIEWED FILES

Strawberry Lemonade Front.pdf

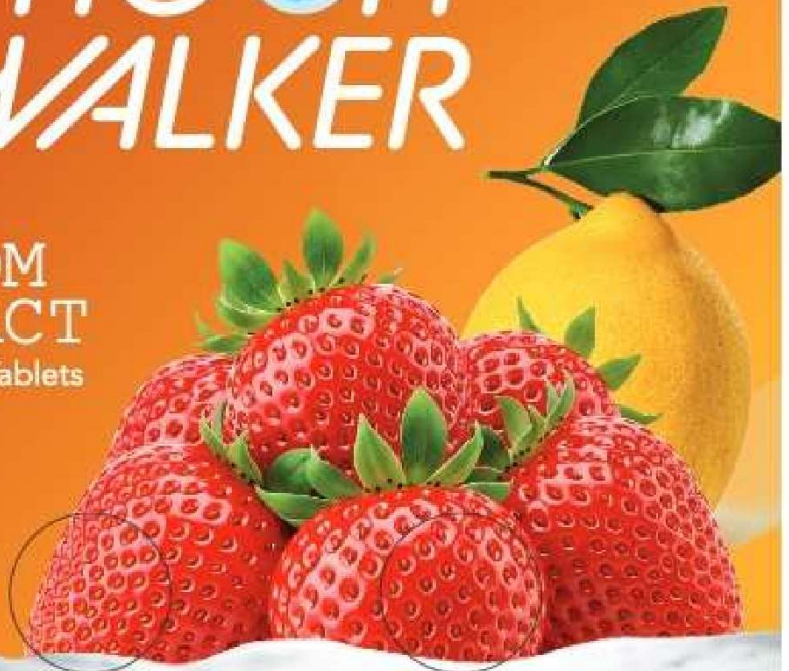
Product Label 1.6 MB

3.75"

5.5"

MOON WALKER

KRATOM
EXTRACT
4x Chewable Tablets



STRAWBERRY LEMONADE

250 MG PER TABLET | 1000 MG TOTAL

DIETARY SUPPLEMENT

Strawberry Lemonade Back.pdf

Product Label 2.4 MB

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	391 parts per million (PPM) ON DRY WEIGHT BASES
Batch Number	027101007SL
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



COA STRAWBERRY LEMONADE.pdf

Certificate of Analysis (COA) 2.0 MB

Certificate of Analysis

Sample Name: MOON WALKER KRATOM CHEWABLE TABLET 250MG
STRAWBERRY LEMONADE

Client: Moon Walker Bota LLC

Sample Code: DTS-251212-011

Matrix Name: Pill - Tablet

Type / Result: Quality Assurance - Pass



Received Date: Mon, Dec 15, 2025

Published Date: Thu, Dec 18, 2025

Batch/Lot Code: 027101007SL

Batch Size: 5.90kg

Sample Size: 590mg

Average Unit Weight: 0.591575g

ALKU
Kratom Alkaloids
High Level

ALKL
Kratom Alkaloids
Low Level

MOS
Moisture Content
Loss on Drying

7OHFL
7-Hydroxymitragynine
Florida

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-251212-011

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ALKU

Kratom Alkaloids - High Level

LAB-TM-052 - Determination of Kratom Alkaloid Content by UPLC-DAD
ALKU-DTS-251212-011-01 - TUE, DEC 16, 2025

Analyte	Value	Value (mg/g)	Per Package	Action Limit	LOD	LOQ	Status
Mitragynine	19.0711 %	190.7108 mg/g	112.82 mg	N/A	0.3 ug/g	0.5 ug/g	N/A
Paynantheine	0.8321 %	8.3208 mg/g	4.92 mg	N/A	0.3 ug/g	0.5 ug/g	N/A
Speciogynine	0.4446 %	4.4461 mg/g	2.63 mg	N/A	0.3 ug/g	0.5 ug/g	N/A
Specioclilatine	0.1256 %	1.2560 mg/g	0.74 mg	N/A	0.3 ug/g	0.5 ug/g	N/A
Total Major Alkaloids*	20.4734 %	204.7337 mg/g	121.12 mg	N/A	N/A	N/A	N/A

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

ALKL

Kratom Alkaloids - Low Level

LAB-TM-047 - Determination of Kratom Alkaloid Content by LC-TQ
ALKL-DTS-251212-011-01 - WED, DEC 17, 2025



Analyte	Value	Value (mg/g)	Per Package	Action Limit	LOD	LOQ	Status
7-Hydroxymitragynine	0.03752 %	0.37517 mg/g	0.22 mg	N/A	0.002 ug/g	0.011 ug/g	N/A
Mitraphylline	0.00025 %	0.00251 mg/g	0.00 mg	N/A	0.004 ug/g	0.019 ug/g	N/A
Total Minor Alkaloids*	0.03777 %	0.37767 mg/g	0.22 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-251212-011-01 - THU, DEC 18, 2025



Analyte	Value	Action Limit	LOD	LOQ	Status
Moisture	4.10 %	N/A	N/A	N/A	N/A

7OHFL

7-Hydroxymitragynine - Florida - Dry-Weight Basis

7-Hydroxymitragynine - (Florida — Dry-Weight Basis)
7OHFL-DTS-251212-011-01 - THU, DEC 18, 2025

Analyte	Value	Action Limit	LOD	LOQ	Status
7-Hydroxymitragynine - As Received*	375.20 ppm	N/A	N/A	N/A	N/A
7-Hydroxymitragynine - Dry-Weight*	391.24 ppm	400 ppm	N/A	N/A	PASS
Moisture (%) by Input*	4.10 %	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.

