

Kratom Compliance Review Florida

September 3, 2026 | 2:24:46 PM



Compliant
 All reviewed requirements passed.

● Passing

● Needs Attention

● Critical

31

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REVIEW SUMMARY

STATE	SUBSTANCE
FLORIDA	KRATOM
COMPANY NAME	PRODUCT TYPE
MOON WALKER	CAPSULE
PRODUCT NAME	COMPLIANCE STATUS
WATERMELON	COMPLIANT
SKU	
—	
PRODUCT IMAGES	CERTIFICATE OF ANALYSIS (COA)
Watermelon Front.pdf Watermelon Back.pdf	COA-WATERMELON.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.

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. Alkaloid Ratio Declaration

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.

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).

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 (304 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 before the usage instructions, specifying how to split, chew, and consume the tablet with water.

Ref: FED-Directions-Recommended

7. Company or Brand URL

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

Evidence: The label shows only an email/web (contact@moonwalkerkratom.com) but no printed web address (URL) for the company or brand.

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 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

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 as a recommendation: "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

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.

Suggested Fix: The label states: "you assume full responsibility for any adverse events and/or health complications that may result from its use," which waives liability for any use, not just misuse—this is a blanket disclaimer and 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 image, and no dieline or artwork specification stating the type size is 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 naming components by common name, but the descending order of predominance by weight cannot be confirmed from the label.

Ref: 21CFR101.4

16. 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 presents this product as a "Dietary Supplement" and includes "Supplement Facts," so it is subject to Chapter 500, F.S. and 21 C.F.R. 111. Please confirm with your manufacturer that these facility and manufacturing requirements are met.

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

17. 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," including street number, street, city, state, ZIP and relationship term.

Ref: 21CFR101.5

18. 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; no allergen terms appear on either panel.

Ref: 21USC343(w)

19. 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 187.3527 mg/g and 7-hydroxymitragynine (the only listed compound detected) at 0.29162 mg/g, giving a ratio of about 642:1, above the required 100:1.

Ref: 2ER26-1-MitragynineRatio

20. Disease Claims

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

Evidence: The label contains only negative statements, such as "Not intended to diagnose, treat, cure, or prevent any disease," with no disease claims present.

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

21. Storage Instructions

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

Evidence: The information panel states "Store in a cool, dry place away from direct sunlight," satisfying the storage instruction requirement.

Ref: FED-StorageInstructions-Recommended

22. 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 information panel 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

23. Batch Number

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

Evidence: The back panel lists a "Batch Number" of 027101008WM, satisfying the batch identifier requirement.

Ref: FL-BatchNumber-Recommended

24. 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 states "Consume no more than one serving every 48 hours," giving a serving size and time frame without using the word "dose."

Ref: FL-Directions-ServingSize-Recommended

25. Expiration Date

Rule Summary: The label should display an expiration date.

Evidence: The information panel lists an "Expiration Date" of 12/2028, satisfying the month-and-year requirement.

Ref: FL-ExpirationDate-Recommended

26. 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's address.

Ref: FL-Kratom-QRCode-COA-Recommended

27. Consult Healthcare Professional Warning

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

Evidence: The label 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

28. 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 label states "Consume no more than one serving every 48 hours," which conveys a warning against exceeding the recommended serving.

Ref: FL-WarningStatements-DoNotExceedServing-Recommended

29. Warning Statement Presentation

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

Evidence: The back panel states substantive warnings directly, including "For adults 21+ only," pregnancy/nursing caution, and the FDA disclaimer, without directing consumers to a website.

Ref: FL-WarningStatements-General-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 back panel's Safety & Legal Disclaimer states "Do not use if pregnant, nursing, or operating heavy machinery," which conveys the required caution against use during pregnancy or nursing.

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 304.38 ppm, below the 400 ppm limit.

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

REVIEWED FILES

Watermelon Front.pdf

Product Label 1.2 MB

3.75"

5.5"

MOON WALKER

KRATOM
EXTRACT
4x Chewable Tablets



Watermelon Back.pdf

Product Label 2.2 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	304.38 parts per million (PPM) ON DRY WEIGHT BASES
Batch Number	027101008WM
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 82135 5

COA WATERMELON.pdf

Certificate of Analysis (COA) 2.0 MB

Certificate of Analysis

Sample Name: MOON WALKER KRATOM CHEWABLE TABLET 250MG WATERMELON
Client: Moon Walker Bota LLC
Sample Code: DTS-251212-013
Matrix Name: Pill - Tablet
Type / Result: Quality Assurance - Pass



Received Date: Mon, Dec 15, 2025
Published Date: Thu, Dec 18, 2025
Batch/Lot Code: 027101008WM
Batch Size: 5.90kg
Sample Size: 590mg
Average Unit Weight: 0.593225g

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

Leslie Varela
Laboratory Director

Cambium Analytica
Thursday, Dec 18, 2025

RESULTS CERTIFIED BY:

Douglas Smith

Douglas Smith
VP - Scientific Operations

Cambium Analytica
Thursday, Dec 18, 2025

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Lab Information

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



DTS-251212-013

2/2

ALKU

Kratom Alkaloids - High Level

LAB-TM-052 - Determination of Kratom Alkaloid Content by UPLC-DAD
ALKU-DTS-251212-013-01 - TUE, DEC 16, 2025

Analyte	Value	Value (mg/g)	Per Package	Action Limit	LOD	LOQ	Status
Mitragynine	18.7353 %	187.3527 mg/g	111.14 mg	N/A	0.3 ug/g	0.5 ug/g	N/A
Paynanthine	0.8211 %	8.2107 mg/g	4.87 mg	N/A	0.3 ug/g	0.5 ug/g	N/A
Speciogynine	0.4338 %	4.3381 mg/g	2.57 mg	N/A	0.3 ug/g	0.5 ug/g	N/A
Specioclathine	0.1252 %	1.2516 mg/g	0.74 mg	N/A	0.3 ug/g	0.5 ug/g	N/A
Total Major Alkaloids*	20.1153 %	201.1531 mg/g	119.33 mg	N/A	N/A	N/A	N/A

*Total Major Alkaloids is calculated as the sum of Mitragynine, Paynanthine, Specioclathine and Speciogynine.

ALKL

Kratom Alkaloids - Low Level

LAB-TM-047 - Determination of Kratom Alkaloid Content by LC-TQ
ALKL-DTS-251212-013-01 - WED, DEC 17, 2025



Analyte	Value	Value (mg/g)	Per Package	Action Limit	LOD	LOQ	Status
7-Hydroxymitragynine	0.02916 %	0.29162 mg/g	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	N/A	0.004 ug/g	0.019 ug/g	N/A
Total Minor Alkaloids*	0.02942 %	0.29419 mg/g	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-251212-013-01 - THU, DEC 18, 2025



Analyte	Value	Action Limit	LOD	LOQ	Status
Moisture	4.20 %	N/A	N/A	N/A	N/A

7OHFL

7-Hydroxymitragynine - Florida - Dry-Weight Basis

7-Hydroxymitragynine - (Florida — Dry-Weight Basis)
7OHFL-DTS-251212-013-01 - THU, DEC 18, 2025

Analyte	Value	Action Limit	LOD	LOQ	Status
7-Hydroxymitragynine - As Received*	291.60 ppm	N/A	N/A	N/A	N/A
7-Hydroxymitragynine - Dry-Weight*	304.38 ppm	400 ppm	N/A	N/A	PASS
Moisture (%) by Input*	4.20 %	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.

