

No. 20-1376

**In the United States Court of Appeals
for the District of Columbia Circuit**

HEMP INDUSTRIES ASSOCIATION; AND RE BOTANICALS, INC.,

Petitioners,

v.

DRUG ENFORCEMENT ADMINISTRATION; AND TIMOTHY SHEA, ACTING
ADMINISTRATOR, DRUG ENFORCEMENT ADMINISTRATION,

Respondents

PETITION FOR REVIEW

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CORPORATE DISCLOSURE STATEMENT

Petitioner Hemp Industries Association is a non-profit trade group that represents hemp companies and researchers in the United States and Canada. It does not have any parent companies, subsidiaries, or affiliates that have issued shares to the public.

Petitioner RE Botanicals, Inc. is a privately held company and does not have any parent companies, subsidiaries, or affiliates that have issued shares to the public.

September 18, 2020

/s/Shane Pennington

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Under § 877 of the Controlled Substances Act (“CSA”) (21 U.S.C. § 877), §§ 702, 706 of the Administrative Procedure Act (“APA”) (5 U.S.C. §§ 702, 706), and Federal Rules of Appellate Procedure 15, Petitioners petition the Court for review of the Drug Enforcement Administration’s (“DEA”) interim final rule entitled “Implementation of the Agriculture Improvement Act of 2018” effective on August 21, 2020 (85 Fed. Reg. 51,639), and is attached as **Exhibit 1** (the “IFR”).

I. Petitioners

Petitioner **Hemp Industries Association** is a 501(c)(6) trade association that represents approximately 1,050-member hemp businesses, including approximately 300 hemp processors and individuals involved in, or impacted by, the manufacture, distribution and/or sale of intermediary hemp extract and such other products lawfully derived from hemp.

Petitioner **RE Botanicals, Inc.** is a private corporation with its principal place of business in South Carolina. RE Botanicals, Inc. is involved in and impacted by the manufacture, distribution and/or sale of intermediary hemp extract and such other products derived from hemp. In 2019, RE Botanicals, Inc. acquired Palmetto Synergistic Research LLC dba Palmetto Harmony (“Palmetto”). Palmetto was founded by Janel Ralph to provide reliable and high-quality hemp products.

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