

EXHIBIT 22

**STATE COURT OF COBB COUNTY
STATE OF GEORGIA**

CIVIL ACTION NUMBER 22-A-1536

\$198.00 COST PAID

Baker, Dana
Pope, John
Reilly, Mark
Watson, David L.

PLAINTIFF

VS.

Reilly, Mark
Watson, David L.
Biopharmaceutical Technology Services, Inc.
American Kratom Association
Martian Sales, Inc.
World of Tobacco Inc.
OPMS , DBA Optimized Plant Mediated
Solutions; O.P.M.S.; OPMS Solutions, Inc.;
OPMS Solutions Group LLC; OPMS
Solutions; OPMS Wholesale and/or Choice
Organics

DEFENDANTS



**STATE COURT OF COBB COUNTY
STATE OF GEORGIA**

SUMMONS

TO: MARTIAN SALES, INC.

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Eli J. Cohen
WETHERINGTON LAW FIRM, P.C.
1800 Peachtree Street NE
Suite 370
Atlanta, Georgia 30309**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 10th day of May, 2022.

Clerk of State Court



Robin C. Bishop

Robin C. Bishop, Clerk of State Court
Cobb County, Georgia

ID# E-M3EAKUJD-GCS
EFILED IN OFFICE
CLERK OF STATE COURT
COBB COUNTY, GEORGIA
22-A-1536

MAY 09, 2022 01:16 PM

Robin C. Bishop
Robin C. Bishop, Clerk of State Court
Cobb County, Georgia

**IN THE STATE COURT OF COBB COUNTY
STATE OF GEORGIA**

DANA BAKER and JOHN POPE, both
individually as surviving Parents of Ethan
Pope, and as the Administrator of the Estate of
Ethan Pope, deceased,

Plaintiffs,

v.
OPMS (A/K/A OPTIMIZED PLANT
MEDIATED SOLUTIONS; O.P.M.S.;
OPMS SOLUTIONS, INC.; OPMS
SOLUTIONS GROUP LLC; OPMS
SOLUTIONS; OPMS WHOLESALE;
AND/OR CHOICE ORGANICS);
MARTIAN SALES, INC.; MARK
REILLY; DAVID L. WATSON;
BIOPHARMACEUTICAL
TECHNOLOGY SERVICES, INC.;
AMERICAN KRATOM ASSOCIATION;
and WORLD OF TOBACCO, INC,

Defendants.

Civil Action

File No. _____

PLAINTIFFS' COMPLAINT AND DEMAND FOR JURY TRIAL

This is a product liability action against the manufacturers, distributors, and sellers of kratom, a non-prescription dietary supplement. Plaintiffs bring this action on behalf of themselves, and their twenty-three-year-old son, who died after using the product.

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Dana Baker ("Baker") is a citizen and resident of Georgia. By bringing this action, Baker avails herself of the jurisdiction of this Court.
2. Plaintiff John Pope ("Pope") is a citizen and resident of Georgia. By bringing this action, Pope avails himself of the jurisdiction of this Court.
3. Ethan Wyatt Pope ("Ethan") is the deceased son of Baker and Pope.



4. Defendant OPMS (a/k/a Optimized Plant Mediated Solutions, O.P.M.S., OPMS Solutions, Inc., OPMS Solutions Group, LLC, OPMSolutions, OPMS Wholesale, and/or Choice Organics) (Hereafter all known as “OPMS”) was and is a manufacturer, distributor, and seller of kratom products throughout the United States, including Georgia.

5. This Court has general personal jurisdiction over OPMS because, on information and belief, OPMS’s principal place of business is in Georgia. In the alternative, this Court has personal jurisdiction over OPMS under the Georgia’s long-arm statute by virtue of OPMS doing business in Georgia, by contracting with Georgia residents pursuant to contracts to be performed in part in Georgia, and/or by committing torts where one or more elements of the tort occurred in Georgia.

6. After a diligent search, OPMS does not maintain a registered agent in Georgia, or in any other state. OPMS may be served according to O.C.G.A. § 14-2-504(b).

7. Venue in this Court is proper because OPMS is a joint tortfeasor with one or more of the named defendants.

8. Defendant Martian Sales Inc, (“Martian Sales”) is a foreign corporation formed in the State of Wyoming, with its principal place of business located in Cobb County, Georgia. This Court has personal jurisdiction over Martian Sales because it is home in Georgia. Venue is proper in this Court because Martian Sales maintain its principal office in Cobb County.

9. Defendant Mark Reilly (“Reilly”) is a citizen and resident of Georgia. This Court has personal jurisdiction over Reilly because he is a resident of Georgia. Venue is proper in this Court as to Reilly because he is a resident of Cobb County. Reilly may be served at his home located at 3760 Chattahoochee Summit Drive SE, Atlanta, Georgia, 30339.

10. Defendant David L. Watson (“Watson”) is a citizen and resident of Georgia. This Court has personal jurisdiction over Reilly because he is a resident of Georgia. Venue is proper

in this Court as to Watson because is a joint tortfeasor with one or more of the named defendants. Watson may be served at his home located at 163 Huntington Rd NE, Atlanta, GA 30309-1503.

11. Defendant Biopharmaceutical Technology Services, Inc. ("BTS") is a foreign corporation with its principal place of business located at 1621 Central Ave, Cheyenne, WY 82001. This court has jurisdiction of BTS because it is a because is a joint tortfeasor with one or more of the named defendants. BTS may be served via its registered agent located at Wyoming Registered Agent, 1621 Central Ave., Cheyenne, WY 82001.

12. Defendant American Kratom Association ("AKA") is a foreign corporation with its principal place of business located at 5501 Merchants View Sq #202, Haymarket, VA 20169, which is a P.O. Box at a UPS Store. This court has jurisdiction of AKA because it is a joint tortfeasor with one or more of the named defendants. AKA lists its registered agent as "Mac Haddow," and lists his address as the same UPS Store and P.O. Box listed above. Mac Haddow is Charles McClain Haddow, a/k/a "CM Haddow," and he can be served at his home address located at 6667 Muir Dr., Haymarket, Virginia 20169-2743.

13. Defendant World of Tobacco, Inc. ("WoT") is a domestic corporation with its principal place of business located at 1117 Crosstown Court, Peachtree City, Georgia, 30269. This court has jurisdiction over WoT because it is a Georgia domestic corporation. Venue is proper in this Court as to WoT because is a joint tortfeasor with one or more of the named defendants.

14. Plaintiffs have not stated any causes of action implicating any federal questions. As both Plaintiffs and some of the Defendants in this action are citizens of Georgia permissively joined under O.C.G.A. § 9-11-20, this civil action is not removable to federal court under 28 U.S.C. § 1441(b)(2). Plaintiffs note that the improper removal of this case should be remedied by

a remand with an award of all costs, expenses, and fees including, but not limited to, attorneys' fees under 28 U.S.C. § 1447(e).

OPERATIVE FACTS

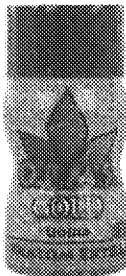
15. In 2021, Ethan Pope, visited his parents in Peachtree City, Georgia.

16. While at home, Ethan purchased a number of bottles of OPMS Gold Liquid Kratom Extract ("Kratom").

17. On December 2, 2021, Ethan was found deceased on the floor of his home by his mother.

18. Bottles of Kratom were found nearby Ethan's body.

19. Defendants OPMS, Martian Sales, Reilly, Watson, BTS, and WoT designed, specified, manufactured, mixed, assembled, inspected, tested, marketed, placed into the stream of commerce, and/or sold the subject Kratom.



(Example only)

20. Kratom, also known as "mitragynine," is derived from the *Mitragyna speciosa* tree native to Southeast Asia.

21. Kratom is an unregulated substance in the United States, and there are no FDA-approved uses for Kratom.

22. Although not formally classified as an opiate, kratom contains dozens of psychoactive compounds or alkaloids, many of which are not well understood. While research is ongoing, the two most-studied alkaloids are mitragynine and 7-hydroxymitragynine. These

two alkaloids bind to the same opioid brain receptors as morphine. Like opiates, these compounds can lead to analgesia (release of pain), euphoria, and sedation.

23. Kratom manufacturers and distributors have no reliable basis for specifying the variable doses and potencies of kratom's various psychoactive compounds in product packaging. Kratom's serious health risks include risks of abuse, dependence, addiction, overdose, and death.¹ Scientific literature has documented serious concerns regarding the toxicity of kratom in multiple organ systems. Consumption of kratom can lead to many adverse health impacts, including respiratory depression, nervousness, agitation, aggression, sleeplessness, hallucinations, delusions, tremors, loss of libido, constipation, skin hyperpigmentation, nausea, vomiting, and severe withdrawal signs and systems.² Effective treatments for kratom addiction and overdose have not been fully developed by the medical community.³

24. Over the past ten years, reports of kratom poisonings and overdose deaths have risen dramatically throughout the country.

25. Kratom is already illegal in several states and cities, and it is not approved for medical purposes. The FDA has issued numerous warnings against the use of products containing kratom or its psychoactive compounds and has taken action against those who illegally sell the product for pain treatment and other medical uses.⁴

¹ See FDA News Release, FDA issues warnings to companies selling illegal, unapproved kratom Drug products (<https://www.fda.gov/news-events/press-announcements/fda-issues-warnings-companies-selling-illegal-unapproved-kratom-drug-products-marketed-opioid>) (last accessed May 9, 2022); see also DOJ DEA Drug Fact Sheet – Kratom (https://www.dea.gov/sites/default/files/2020-06/Kratom-2020_0.pdf) (last accessed May. 9, 2022).

² See FDA Import Alert # 54-15 (https://www.accessdata.fda.gov/cms_ia/importalert_1137.html) (last accessed May. 9, 2022).

³ See FDA News Release, FDA and Kratom (<https://www.fda.gov/news-events/public-health-focus/fda-and-kratom>) (last accessed May. 9, 2022).

⁴ See FDA Statement, Statement from FDA Commissioner Scott Gottlieb, M.D. on FDA advisory about deadly risks associated with kratom (<https://www.fda.gov/news-events/press-announcements/statement-fda-commissioner-scott-gottlieb-md-fda-advisory-about-deadly-risks-associated-kratom>) (last accessed May. 9, 2022).

26. In recent years, certain kratom manufacturers have begun producing and marketing concentrated forms of kratom. These manufacturers include Defendant Martian Sales, Inc., and Defendants which produces the OPMS liquid shot.

27. The OPMS kratom liquid shots are particularly dangerous because they are intended to provide consumers with higher concentrations of the psychoactive alkaloids, substantially increasing the risk of overdose and death.

28. In the days leading up to his death, Ethan went to WoT's store located at 1117 Crosstown Court, Peachtree City, Georgia, 30269, and purchased multiple bottles of OPMS Kratom.

29. Prior to his death, Ethan consumed OPMS Liquid Gold kratom drink.

30. The kratom product Ethan used was manufactured, distributed, and sold by Defendants.

31. An autopsy was conducted on Ethan's body and the Medical Examiner determined Ethan died as a result of cardiac arrest due to mitragynine intoxication.

32. Mitragynine intoxication occurs as a result of ingesting Kratom.

33. Ethan ingested Kratom OPMS liquid shot and died as a result.

34. Despite the danger of Kratom, Defendants continue to market Kratom as a safe and effective alternative to opiate prescriptions.

35. Despite the serious risks of kratom use, companies such as defendants continue to market kratom products with unproven and deceptive claims about kratom's safety and ability to cure, treat or prevent medical conditions and diseases.

36. Defendants attempts to sidestep responsibility for the illegal sale of dangerous and unapproved medicinal products, by combining grandiose medicinal marketing statements with contradictory disclaimers.

37. Kratom products are not safe for human consumption, and the deceptive marketing and sale of these products has encouraged consumers and patients to try mysterious and dangerous compounds in lieu of seeking appropriate and approved medical treatments that can be safely supervised by medical professionals.

38. In short, Defendants misrepresented and misled consumers about the risks and benefits of kratom use to the tragic detriment of Ethan.

COUNT 1: NEGLIGENCE

39. As manufacturers, marketers, distributors, promoters, and sellers of the dietary supplement kratom, the Defendants had a duty to prevent foreseeable injuries arising from the use of their products, including making timely and truthful disclosures about kratom's risks and side effects; properly testing each batch of kratom for purity and potency; and conforming manufacturing practices to the standards necessary to produce a consistently pure and evenly potent product, prior to the time of sale, up to the time of plaintiff's injury and death.

40. Long before Ethan's death in 2021, Defendants had actual and/or constructive knowledge that kratom could cause serious harm to consumers, including addiction, dependency, tolerance, overdose, and death.

41. Defendants' actual or constructive knowledge of serious harm from kratom has continuously grown, as reflected in a growing list of additional publications, including but not limited to news articles and television segments, FDA announcements, and industry publications.

42. After Ethan began taking kratom, Defendants had actual or constructive knowledge of the risks of addiction, overdose, and death associated to kratom consumption.

43. Defendants had an ongoing duty to stay apprised of these risks, and to update their labeling and marketing communications to warn of these risks.

44. Defendants breached their duties of care toward Plaintiffs in one or more of the following ways:

44.1. In producing kratom products with concentrated alkaloids with knowledge that these concentrated products were far more likely to lead to overdose and death.

44.2. In failing to properly label and package their product in order to make Plaintiff and consumers aware of the risks associated to Kratom.

44.3. In failing to properly label and package their product in order to provide effective guidance for product use and consumption.

45. Each Defendant's negligence was a substantial contributing factor in causing Ethan's death.

46. Defendants' negligence was the direct and proximate cause of Ethan's death.

47. Defendants' actions showed willful misconduct, malice, fraud, wantonness, oppression, and/or that entire want of care which would raise the presumption of conscious indifference to consequences, including Ethan's death.

48. As a direct and proximate result of Defendants, negligence, Plaintiffs incurred the following damages for which they are entitled to recover from Defendants: (1) wrongful death and injury, and (2) past pain and suffering.

49. As the proximate result of Defendants' negligence, Plaintiffs suffered general damages with an exact amount to be determined by the enlightened conscience of a fair and impartial jury based upon the evidence presented at a trial for this matter.

COUNT 2: NEGLIGENCE
(World of Tobacco)

50. As retail sellers of kratom, Defendant WoT had a duty to reasonably investigate and inspect these products before selling them to ensure they were safe for public consumption.

51. WoT also have a duty to ensure the products they sell are not adulterated or misbranded, and a duty to ensure the products they sell do not contain false representations of material facts.

52. When WoT sold kratom products to Ethan, WoT knew or should have known that kratom was not approved and unreasonably dangerous for human consumption, especially for medicinal uses, such as the alleviation of chronic pain. Knowledge of kratom's dangers was readily available from news articles and news segments, medical literature, and the FDA.

53. WoT breached their duties of care in selling kratom products in one or more of the following ways:

53.1. WoT knew or should have known of kratom's potential to cause serious side effects, including tolerance, addiction, overdose, and death.

53.2. WoT knew or should have known that they were unlawfully selling the products to customers for medical purposes, even though the unreasonable health risks of such use were not properly understood, identified, disclosed, approved, or regulated.

53.3. WoT knew or should have known that defendants' disclaimers were a sham attempt to avoid responsibility for products that were not safe for human consumption.

53.4. WoT negligently passed on to consumers (including Ethan) representations about the products, including representations that kratom was safe.

54. Defendants' actions showed willful misconduct, malice, fraud, wantonness, oppression, and/or that entire want of care which would raise the presumption of conscious indifference to consequences, including Ethan's death.

55. Defendants' negligence was the direct and proximate cause of Ethan's death.

56. As a direct and proximate result of Defendants' negligence, Plaintiffs incurred the following damages for which they are entitled to recover from Defendants: (1) wrongful death and injury, and (2) past pain and suffering.

57. As the proximate result of Defendants' negligence, Plaintiffs suffered general damages with an exact amount to be determined by the enlightened conscience of a fair and impartial jury based upon the evidence presented at a trial for this matter.

COUNT 3: STRICT LIABILITY – WARNINGS DEFECT

58. Defendants were engaged in the business of manufacturing, promoting, distributing, and selling the kratom product that killed Ethan.

59. The kratom products Ethan purchased and ingested were expected to and did, in fact, reach Ethan without substantial change in the condition they were in at the time they left defendants' hands.

60. Ethan used Defendants' kratom products for its intended purpose.

61. At the time they left Defendants' hands, the kratom products were defectively labeled.

62. They did not provide adequate warnings and instructions that an ordinary consumer would expect, and the inadequate warnings made the kratom products more dangerous than an ordinary consumer would expect. Specifically, the information accompanying Defendants' kratom products, including the packaging, promotional materials, website information, and directions for use, were inadequate in one or more of the following ways:

62.1. Defendants failed to warn of the risks of abuse, dependence, addiction, overdose, and death.

62.2. Defendants failed to provide specific guidance regarding product use, including recommended levels of dosage and daily consumption limits.

62.3. Defendants failed to provide information regarding product purity and potency on product packaging.

62.4. OPMS' liquid shots do not include any instructions for use;

62.5. OPMS' liquid shots include a warning that does not mention the known risks of addiction, overdose, and death; and

62.6. OPMS's label is unreadable and any warnings it may have included cannot be seen by the consumer.

63. Defendants' labels made the kratom products unreasonably dangerous and defective, beyond what an ordinary consumer would expect.

64. Had Defendants' kratom products been sold with adequate warnings and instructions regarding their risks, Ethan would not have taken defendants' kratom products.

65. The unreasonably dangerous and defective labeling of each defendant's kratom products was a substantial factor contributing to Ethan death.

66. Defendants' actions showed willful misconduct, malice, fraud, wantonness, oppression, and/or that entire want of care which would raise the presumption of conscious indifference to consequences, including Ethan's death.

67. As a direct and proximate result of Defendants' negligence, Plaintiffs incurred the following damages for which they are entitled to recover from Defendants: (1) wrongful death and injury, and (2) past pain and suffering.

68. As the proximate result of Defendants' negligence, Plaintiffs suffered general damages with an exact amount to be determined by the enlightened conscience of a fair and impartial jury based upon the evidence presented at a trial for this matter.

COUNT FOUR: STRICT LIABILITY – DESIGN DEFECT

69. Defendants were engaged in the business of manufacturing, designing, distributing, and selling the kratom product that killed Ethan.

70. The kratom products Ethan purchased and ingested were expected to and did, in fact, reach Ethan without substantial change in the condition they were in at the time they left defendants' hands.

71. Ethan ingested Defendants' kratom products, which is the very purpose for which Defendants designed, manufactured, distributed, and sold these products.

72. When Defendants manufactured, distributed, and sold their product they were defectively manufactured and/or designed because it was adulterated.

73. As designed, Defendants' kratom products could not be made reasonably safe for human consumption because Defendants cannot conform their manufacturing process to ensure consistent potency or purity.

74. From the standpoint of a reasonable consumer, the known risks of addiction, overdose, and death and the lack of consistent and reliable safety testing make the risks of kratom use outweigh the utility.

75. OPMS liquid shots claim to contain a concentration of kratom alkaloids such as mitragynine and 7-hydroxymitragynine that is unreasonable dangerous and defective, beyond what an ordinary consumer would expect.

76. The above defects in design made Defendants' kratom products unreasonably dangerous and defective, beyond what an ordinary consumer would expect.

77. Had Defendants' kratom products been adequately tested and designed, Ethan would not have suffered injury and death.

78. Defendants' products are not safe for human consumption and are adulterated.

79. The unreasonably dangerous and defective design of defendants' kratom products was a substantial factor contributing to Ethan's injury and death.

80. Defendants' actions showed willful misconduct, malice, fraud, wantonness, oppression, and/or that entire want of care which would raise the presumption of conscious indifference to consequences, including Ethan's death.

81. As a direct and proximate result of Defendants' negligence, Plaintiffs incurred the following damages for which they are entitled to recover from Defendants: (1) wrongful death and injury, and (2) past pain and suffering.

82. As the proximate result of Defendants' negligence, Plaintiffs suffered general damages with an exact amount to be determined by the enlightened conscience of a fair and impartial jury based upon the evidence presented at a trial for this matter.

COUNT 5: NEGLIGENT MISREPRESENTATION

83. In the course of their business as manufacturers, and/or distributors, and sellers of kratom products, defendants made misrepresentations of material facts and intentionally concealed information about their products from Ethan during the time Ethan bought and used these products.

84. Defendants intended these misrepresentations and false information to serve as guidance for consumers in deciding whether to purchase the kratom products and how to use them.

85. Defendants' misrepresentations in general included one or more of the following:

85.1. Statements that their kratom products are safe for human consumption.

85.2. Statements that they had conducted adequate clinical safety testing of their products.

86. The information above was false at the time it was supplied.

87. Defendants possessed superior knowledge about the lack of clinical testing and safety of their products, including the lack of reliable support for representations about the asserted clinical and medicinal safety of kratom and the absence of deaths caused by kratom products.

88. In misrepresenting the safety of their kratom products, defendants also failed in their duty to disclose known material facts to Ethan regarding kratom products, including but not limited to:

88.1. The health risks associated with regular consumption of kratom.

88.2. The addictiveness of kratom

88.3. Information regarding adverse events associated with kratom.

88.4. The risk of overdose and death associated with kratom.

89. The above representations and omissions were material, and defendants made them with the intent to persuade and induce Ethan to choose and regularly use the products.

90. Defendants made the above representations or omissions knowing the misrepresentations were false or were ignorant of the truth of the assertions.

91. The above representations and omissions are reflected in Defendants' system for marketing their kratom product(s) through their local distributors, including WoT.

92. Together, all Defendants unlawfully promoted and sold these unreasonably dangerous products for consumers, including Ethan.

93. It was reasonable for consumers, including Ethan, to rely on the misinformation provided by defendants when deciding whether and how to use their kratom products

94. As manufacturers, and/or distributors, and sellers of dietary supplements, defendants had superior knowledge of kratom, its history, and its safety and risk profile that was unavailable to ordinary consumers

95. Ethan relied upon and was induced to act in reliance on Defendants' misrepresentations and omissions when he purchased the product(s).

96. Each Defendant's misrepresentations were a substantial contributing factor causing plaintiff's injuries.

97. Defendants' actions showed willful misconduct, malice, fraud, wantonness, oppression, and/or that entire want of care which would raise the presumption of conscious indifference to consequences, including Ethan's death.

98. As a direct and proximate result of Defendants' negligence, Plaintiffs incurred the following damages for which they are entitled to recover from Defendants: (1) wrongful death and injury, and (2) past pain and suffering.

99. As the proximate result of Defendants' negligence, Plaintiffs suffered general damages with an exact amount to be determined by the enlightened conscience of a fair and impartial jury based upon the evidence presented at a trial for this matter.

COUNT 6: CIVIL CONSPIRACY

100. All Defendants acted in concert as part of a conspiracy to profit from the sale of kratom products—including the subject Kratom—based on false, misleading, and incomplete marketing materials and fabricated junk science that they knew endangered the public. As such, all Defendants may be held jointly and severally liable for the damages caused by each of their conduct in furtherance of the conspiracy.

DAMAGES CLAIMED BY PLAINTIFFS

101. Plaintiffs claim monetary damages against Defendants:

101.1. For all components of the mental and physical pain and suffering experienced by Ethan before his death, in an amount to be determined by the enlightened conscience of a fair and impartial jury at the time of trial for this matter;

101.2. For the full value of Ethan's life in an amount to be determined by the enlightened conscience of a fair and impartial jury at the time of trial for this matter; and

101.3. An award of Punitive damages.

101.4. An award of Attorneys' Fees and Expenses Under O.C.G.A. § 13-6-11.

WHEREFORE Plaintiffs pray that they are granted the following relief:

102. That a copy of the Summons and Complaint be served upon each Defendant;

103. That Plaintiffs have a trial by jury as to each and every appropriate issue;

104. A judgment against each Defendant;

105. Judgment for Plaintiffs against each Defendant for the full value of Ethan's life;

106. Judgment for Plaintiffs against each Defendant for past pain and suffering;

107. An award of Punitive damages;

108. The recovery of reasonable attorneys' fees and expenses of litigation;

109. That all Defendants be held jointly and severally liable for the damages caused by their concerted action as part of a civil conspiracy.

110. That all costs of this action be cast against Defendants; and

111. Any and all such further relief as the Court may deem just and appropriate.

This 9th day of May, 2022.

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