



WST hereby requests exemption for the following product: **SYN ACID**

- 1.) This product contains proprietary ingredients that the manufacturer holds as trade secret and they have not disclosed the proprietary formulation to us. Therefore, it is not possible for us to disclose the formulation of those ingredients, since they are unknown to us.
- 2.) While working with other regulatory agencies, this product has never been determined to not be entitled to protection from public disclosure. Therefore, this information is not required to be disclosed, or otherwise made available to the public.
- 3.) The manufacturer attributes significant value and commercial advantage to the secrecy of this formulation, which is the result of years of extensive research and development. The manufacturer has invested significant funds on the research and development of this product which contributes to a significant portion of its revenues. Disclosure of the confidential formulations would result in substantial competitive harm to the manufacturer and would have a significant detrimental impact on its business. The loss of competitive advantage would occur across the entire market, not just in Colorado, resulting in the loss of millions of dollars in revenue.
- 4.) The manufacturer's current practices and controls are intended to ensure that its competitors cannot acquire or duplicate confidential product formulations. It would be extremely difficult for competitors to obtain its formulations through any possible legal means. However, if this formulation was made available through public disclosure, competitors would have sufficient information to assist in reverse engineering the product and determining the formula used to develop it.