

March 29, 2022

Steven DeAngelo
DUPONT STREET IMPORTS LLC
208 Dupont Street
Brooklyn, NY 11222

Dear Steven DeAngelo:

I am writing to follow up on earlier communications we have had regarding the ST. AGRESTIS PHONY NEGRONI product that you wish to market. If you follow the enclosed formulas and procedures as written and follow the current good manufacturing practices (detailed in The Code of Federal Regulations Title 21 Parts 117 Subpart B and record keeping in Subpart F and 114), you should not have any problems of public health concern. Be sure to keep records in ink of all safety, quality, and processing checks that are made on your products. In addition, you must get a license from Agriculture and Markets, if you do not have one already, to begin the commercial preparation of your products. Amendments to the above schedule processes will be billed in order to offset expenses.

If your product has a pH of 4.0 or above and the schedule process specifies pH control values, you must use a pH meter for measurements. Any changes in the formulations of these products must be confirmed in writing by a processing authority.

The following articles should be in the folder of information that you received when you first contacted the Food Venture Center. If the files are not available, please contact this office to request copies.

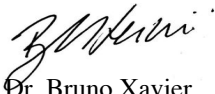
1. Do Your Own Establishment Inspection. A guide to Self Inspection for the Smaller Food Processor and Warehouse. HHS Publication No. (FDA) 82-2163.
2. Code of Federal Regulations Title 21 Part 114.90
3. Good Manufacturing Practices Guide (21 CFR 117 Subpart B and record keeping in Subpart F)

Our programs also offer several fee-based trainings that may be of interest to you, including Better Process Control School and Good Manufacturing Practices Part 117 Online Course.

Information regarding trainings can be found at: <https://instituteforfoodsafety.cornell.edu/trainings>

If we can be of further assistance, please do not hesitate to call or write.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Xavier".

Dr. Bruno Xavier
Process Authority
Cornell Food Venture Center

ST. AGRESTIS PHONY NEGRONI

Carbonated Beverage
Shelf Stable

DUPONT STREET IMPORTS LLC
Steven DeAngelo
208 Dupont Street
Brooklyn, NY 11222
Phone: 646-339-3719
Email: steven@greenhookgin.com

4/5/22

<p>Critical Factors (Must keep records) Maximum pH ≤ 3.30 Must Use Sodium Benzoate</p> <p>Sample Product Values pH = 2.45</p>

INGREDIENTS	WEIGHT (lb)	BY WEIGHT (%)
Water	3375.00	86.46%
Sugar	463.00	11.86%
** Flavor Extract 3, liquid	23.60	0.60%
* Citric Acid	10.00	0.26%
** Flavor Extract 1, liquid	8.30	0.21%
** Flavor Extract 2, liquid	7.10	0.18%
*** Flavor Extract 4, powder	4.21	0.11%
*** Flavor Extract 5, powder	4.21	0.11%
Phosphoric Acid	4.11	0.11%
Sodium Benzoate	3.90	0.10%
Quinine Sulfate	0.13	0.00%
TOTALS	3903.57	100.00%

- * May be increased as needed to control pH. Ingredient list on product label must reflect addition.
- ** Contains 50% alcohol, manufactured by Dupont Street Imports LLC. **Flavor Extract 1** contains: hibiscus, chamomile, rose petal, orris root. **Flavor Extract 2** contains: turkey rhubarb root, gentian root, cascara bark, myrrh gum resin, **Flavor Extract 3** contains: citrus peel.
- *** **Flavor Extract 4** contains: gentian root, **Flavor Extract 5** contains: turkey rhubarb extract.

PROCEDURE:

- 1) Combine and prepare ingredients in chosen manner.
- 2) Check pH to be sure it is 3.30 or lower. Adjust with citric acid if needed.
- 3) Pressurize product with CO₂ in chosen manner.
- 4) Fill product into clean containers and immediately seal.
- 5) Container size/ type: up to 128 oz. aluminum, glass, or food grade container capable of holding pressure.
- 6) Label: "**Refrigerate after Opening**".
- 7) Check pH after equilibration or before shipping to be sure it is 3.30 or lower.

ST. AGRESTIS PHONY NEGRONI

Carbonated Beverage

Shelf Stable

4/5/22

Critical Factors

(Must keep records)

Maximum pH \leq 3.30

Must Use Sodium Benzoate

Sample Product Values

pH = 2.45

DUPONT STREET IMPORTS LLC

Steven DeAngelo

NOTE: Always use the same brand or quality of citric acid and flavor extracts to ensure the proper pH of the finished product.

NOTE: Keep permanent records of critical factors in paper or electronic format in compliance with CFR 117 Subpart F.

NOTE: **Any** changes to this formulation or procedure should be approved in writing by a processing authority.

NOTE: Follow the sanitation recommendations in 21 CFR, Part 117 - Good Manufacturing Practices.

NOTE: Symbols: \leq indicates equal to or less than; \geq indicates equal to or greater than.

NOTE: It is recommended that this scheduled process be reevaluated every three years to ensure compliance with current regulation and/or as part of the Food Safety Plan reanalysis required by the regulations as stated in 21 CFR 117.170(a).

NOTE: This scheduled process validates product process for microbial safety. It is the manufacturer's responsibility to comply with applicable State and Federal rules regarding use of ingredients that are not listed as Generally Regarded as Safe (GRAS) by the Food and Drug Administration.

NOTE: Allergens are considered a Chemical Hazard as described in the FSMA Preventive Controls for Human Foods Rule. To prevent any risk to accidental human consumption, policies and procedures must be established to avoid cross-contamination throughout the manufacturing and storage of foods and food ingredients.

NOTE: This product is a carbonated beverage and therefore is excluded from the acidified foods regulations, based on the definitions stated in 21CFR114.3.

NOTE: Alcohol content of final product may vary depending on the flavor extracts used as well as the cook time and temperature. The processor is responsible for ensuring the final product is at most 0.5% alcohol by volume.