



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Cultivator Application – Filing Packet Notarized Cover Sheet

Instructions are provided in a separate document: Cultivator Application – Request for Applications / Instructions Packet (MMCP-C-1000).

Acknowledgement and Notarized Signature

I hereby acknowledge that knowingly making a statement that is untrue or which is intended to mislead the Medical Marijuana Control Program (MMCP), the Department of Commerce, the State Board of Pharmacy, or the State Medical Board, or any person designated by the State of Ohio in the performance of their official function is a violation of Chapter 3796 of the Revised Code. As the duly authorized representative of the applicant, I hereby attest to the accuracy to the best of my knowledge of the submitted information on this application and make the submitted certifications on behalf of the applicant.

I hereby acknowledge that this application was formulated with the assistance of outside consultants knowledgeable in the industry. If applicable, please include the information requested below regarding the individuals or entities that provided this assistance.

I hereby authorize the Ohio Department of Taxation and any of its agents and/or employees to release information to the Ohio Department of Commerce. These records and information shall be limited to information obtained and maintained by the Ohio Department of Taxation and shall not contain any federal tax information as defined in I.R.C. 6103 and received from the Internal Revenue Service. I expressly waive the confidentiality provisions of the Ohio Revised Code, which would otherwise prohibit disclosure, and agree to hold the above-referenced organization harmless with respect to the disclosure herein. I certify under the penalties of perjury that I am the taxpayer identified below or an agent authorized to certify on its behalf.

Please verify the application level and submit the corresponding, non-refundable application fee:

Level I: I understand and am prepared to submit the non-refundable application fee of \$20,000 at the time of submission of this application. By checking this box, I acknowledge that the applicant and any person possessing a financial interest in the applicant, as defined in O.A.C. 3796:1-1-01, is prohibited from applying as a Level II cultivator. (3796:5-1-01)

-OR-

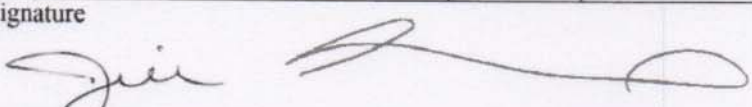
Level II: I understand and am prepared to submit the non-refundable application fee of \$2,000 at the time of submission of this application. By checking this box, I acknowledge that the applicant and any person possessing a financial interest in the applicant, as defined in O.A.C. 3796:1-1-01, is prohibited from applying as a Level I cultivator (3796:5-1-01).



Ohio Department of Commerce

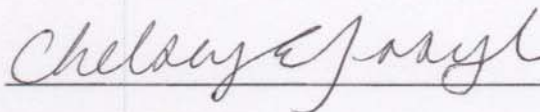


Medical Marijuana Control Program (MMCP)

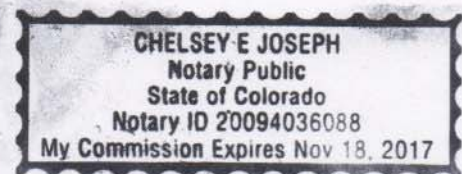
Business Represented:		
Pure OH LLC		
First Name	M.I.	Last Name
Jill	K	Lamoureux
Signature 		
Application Assistance Information		
Name of Company Providing Application Assistance (If individuals, please provide information below) Please see following completed forms for Vector Security, NEXT Architecture and Rough Brothers, Inc.		
First Name	M.I.	Last Name
Address		
Type of Compensation for Services (e.g., future interest, equity stake, reoccurring payment, etc.)		
Signature of Responsible Party		

Subscribed and sworn to before me this 9th day of June, 20 17.

(SEAL)



NOTARY PUBLIC





Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Application Assistance Information		
Name of Company Providing Application Assistance (If individuals, please provide information below)		
Vector Security		
First Name	M.I.	Last Name
<i>Benjamin</i>	<i>D</i>	<i>Palumbo</i>
Address		
970 Windham Ct, #2 Boardman, OH 44512		
Type of Compensation for Services (e.g., future interest, equity stake, reoccurring payment, etc.)		
Fee for services <i>Consulting FEES</i>		
Signature of Responsible Party		
<i>Benjamin Pk.</i>		

Subscribed and sworn to before me this 8th day of June, 2017.

(SEAL) **COMMONWEALTH OF PENNSYLVANIA**
NOTARIAL SEAL
STEPHANIE ANN MIHELIC
 Notary Public
 MARSHALL TWP., ALLEGHENY CNTY
 My Commission Expires Oct 7, 2017

Stephanie Mihelic

NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Application Assistance Information		
Name of Company Providing Application Assistance (If individuals, please provide information below)		
NEXT Architecture		
First Name	M.I.	Last Name
DANIEL	J	DELSIO
Address		
1133 Penn Avenue, Pittsburgh, PA 15222		
Type of Compensation for Services (e.g., future interest, equity stake, reoccurring payment, etc.)		
Fee for services		
Signature of Responsible Party		

Subscribed and sworn to before me this 7 day of JUNE, 20 17.

(SEAL)

NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
GEORGE W LEE
 Notary Public
 CITY OF PITTSBURGH, ALLEGHENY COUNTY
 My Commission Expires Apr 1, 2019





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Application Assistance Information		
Name of Company Providing Application Assistance (If individuals, please provide information below)		
Rough Brothers Inc.		
First Name	M.I.	Last Name
SHANE	C.	NITSCHKE
Address		
5513 Vine Street, Cincinnati, OH 45217		
Type of Compensation for Services (e.g., future interest, equity stake, reoccurring payment, etc.)		
Complimentary facility planning advice		
Signature of Responsible Party		

Subscribed and sworn to before me this 6 day of June, 2017.



JENNIFER ELLEN BREEN
Notary Public, State of Ohio
My Commission Expires 02-15-2022

NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Cultivator Application – Filing Packet Section 1 Identifiable Information Checklist

Section	Description	Completed (✓)
Application Cover Sheet		
-	Acknowledgement and Notarized Signature	X
Section 1: Identifiable Information Section		
1A	Business Entity and Contact Information Form	X
1B	Liquid Assets Form	X
1C	Financial Responsibility Form – Insurance	X
1D	Financial Responsibility Form – Escrow / Surety	X
1E	Property Owner Approval for Use Form	X
1F	500 Foot Compliance Cover Page	X
1G	Notice of Proper Zoning Form	X
1H	Zoning Permit Cover Page	X
1I	Owners and Officers Roster Form	X
1J	Organizational Chart Cover Page	X
1K	Individual Background Information Form (Include copy for each person listed on Attachment 1I)	X
1L	Business in Other Jurisdictions Form	X
1M	Copies of Licenses from Business in Other Jurisdictions Cover Page	X
1N	Tax Payment Records Cover Page	X
1O	Disadvantaged Group Applicant Form	X
1P	Entity Identifier Legend Form	X
1Q	Trade Secret and Infrastructure Record Notification Form	X



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Cultivator Application – Filing Packet - Section 1: Identifiers

Instructions are provided in a separate document titled Cultivator Application – Request for Applications/ Instructions Packet (MMCP-C-1000).

1A Business Entity and Contact Information Form

Business Entity Information						
1. Legal Name of Applicant (3796:2-1-02(B)(2)(a)): Pure OH LLC						
2. Trade Name of Applicant:						
3. Type of Organization/ Applicant Business Type (3796:2-1-02(B)(2)(b)):						
<input type="checkbox"/> Individual/ Sole Proprietorship	<input type="checkbox"/> Corporation	<input type="checkbox"/> Partnership	<input checked="" type="checkbox"/> Limited Liability Corporation	<input type="checkbox"/> Association/ Cooperative	<input type="checkbox"/> Joint Venture	<input type="checkbox"/> Other: _____
4. Ohio Secretary of State Business Identification Number (3796:2-1-02(B)(2)(c)): 4032550						
5. Business Address: 6314 Scotland St.						
6. City: Madison				7. State: OH	8. Zip Code: 44057	
9. Proposed Facility Physical Address (if different than above) (3796:2-1-02(B)(2)(d)): Bacon Avenue and Kemple Drive Columbiana County - Parcel UNTY TP R1 T8 S27 L5 E PAL 68-01700.000						
10. City (if different than above): East Palestine				11. State: Ohio	12. Zip Code: 44413	
13. Business Phone Number: 720-335-1386		14. Email Address: jill@pure-om.com				
Primary Contact or Registered Agent Information						
15. First Name Jill			16. M.I. K	17. Last Name Lamoureux		
18. Title (i.e., Owner, President, etc.) Owner/Manager						
19. Mailing Address (if different than Business Address):					20. City:	



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19. Mailing Address (if different than Business Address):		20. City:	
21. State:	22. Zip Code:	23. Phone Number:	
24. Email Address (if different than Business Email):			
(Optional) Alternative Contact Information			
25. First Name	26. M.I.	27. Last Name	
Alan	M	Kane	
28. Title (i.e., Owner, President, etc.)			
Owner, CFO			
29. Mailing Address (if different than Business Address):		30. City:	
[REDACTED]		[REDACTED]	
31. State:	32. Zip Code:	33. Phone Number:	
[REDACTED]	[REDACTED]	[REDACTED]	
34. Email Address (if different than Business Email):			
alan@purebrands.co			
Identifying Tax Information			
35. FEIN/SSN		36. CAT Account #	
[REDACTED]		[REDACTED]	
37. Vendor's License #		38. Employer Withholding Account #	
[REDACTED]		[REDACTED]	
39. Other Accounts at the Department of Taxation			



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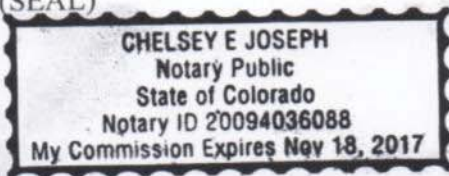
1B Liquid Assets Form

3796:2-1-03(A)(1), 3796:2-1-03(B)(5)(c)

To be Completed by Applicant	
Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations: Pure OH LLC	
To be Completed by Applicant or CPA	
<input type="checkbox"/> Level I: I hereby certify the above listed Applicant has at least \$500,000 in liquid assets, which are unencumbered and can be converted within 30 days after a request to liquidate such assets.	
-OR-	
<input checked="" type="checkbox"/> Level II: I hereby certify the above listed Applicant has at least \$50,000 in liquid assets, which are unencumbered and can be converted within 30 days after a request to liquidate such assets.	
Date of Certification (must be within 30 days of Application submission) (3796:2-1-03(B)(5)(c)(ii),: 06/04/2017	
Printed Name of CPA or Applicant Jill K Lamoureux	CPA Company Name (if applicable)
Phone Number: 720-335-1386	Signature:

Subscribed and sworn to before me this 9 day of June, 20 16.

(SEAL)



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Medical Marijuana Control Program (MMCP)

1C Financial Responsibility Form - Insurance

3796:2-1-03(B)(5)(d), 3796:2-1-05(B)(1)

To be Completed by Applicant	
Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations:	
Pure OH LLC	
<input checked="" type="checkbox"/> I hereby certify the intent to purchase insurance coverage and terms of insurance required and approved by the Department of Commerce, including, but not limited to, products liability and general liability, prior to the issuance of a certificate of operations, if such products are in existence at the time of issuance or the time of renewal.	
-OR-	
<input type="checkbox"/> I hereby certify insurance coverage has been purchased with terms of insurance required and approved by the Department of Commerce, including, but not limited to, products liability and general liability, prior to the issuance of a certificate of operations. Coverage documentation is ATTACHED to this application following this form.	
Date:	Signature:
6/9/17	<i>[Handwritten Signature]</i>

Subscribed and sworn to before me this 9th day of June, 20 17.

(SEAL)

CHRISTOPHER M DAISS
 NOTARY PUBLIC - STATE OF COLORADO
 Notary Identification #20164044892
 My Commission Expires 11/28/2020

[Handwritten Signature]

NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

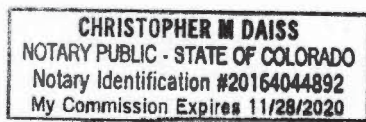
1D Financial Responsibility Form – Escrow / Surety

3796:2-1-02(B)(6)(d), 3796:2-1-05(B)

To be Completed by Applicant or CPA	
Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations: Pure OH LLC	
Type of Security:	
<input checked="" type="checkbox"/> Escrow Account (3796:2-1-05(B)(2))	<input type="checkbox"/> Surety Bond (3796:2-1-05(B)(3))
<input type="checkbox"/> Level 1: I hereby certify the ability of the above listed Applicant to establish and maintain an escrow account or surety bond in the amount of \$750,000, consistent with the Level I application requirements, prior to being awarded a Cultivator Certificate of Operations. -OR- <input checked="" type="checkbox"/> Level II: I hereby certify the ability of the above listed Applicant to establish and maintain an escrow account or surety bond in the amount of \$75,000, consistent with the Level II application requirements, prior to being awarded a Cultivator Certificate of Operations.	
Surety Insurance Company Name (if applicable) (3796:2-1-05(C)):	
Printed Name: Jill K Lamoureux	CPA Company Name (if applicable):
Phone Number: 720-335-1386	Signature:

Subscribed and sworn to before me this 9th day of June, 2017.

(SEAL)



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Medical Marijuana Control Program (MMCP)

1E Property Owner Approval for Use Form
3796:2-1-02(B)(2)(h)

Form with sections: To be Completed by the Applicant, To be Completed by the Owner of the Physical Address of the Proposed Cultivator. Includes fields for Name of Individual or Entity, Physical Address, City, County, State, Zip Code, and Phone Number.

Subscribed and sworn to before me this 12 day of June, 2017.

(SEAL)



Richard Colella
Attorney At Law
Notary Public, State of Ohio
My Commission Does Not Expire
(O.R.C. 147.05)

Signature of Notary Public
NOTARY PUBLIC



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Medical Marijuana Control Program (MMCP)

1F 500 Foot Compliance Cover Page

3796:2-1-02(B)(2)(i), 3796:2-1-03(A)(3)

Attach a location map of the area surrounding the proposed cultivator facility. Include representation of the area within at least a 750 foot radius of the proposed facility in all directions. Identify the relative locations of any prohibited facilities on the map, establishing the facility is at least 500 feet from the boundaries of any parcel of nearby real estate having situated on it a prohibited facility, as measured under rule 3796:5-5-01 of the Administrative Code.

At a minimum, the location map should include representation of any of the following prohibited facilities, as defined in ORC 3796.30:

- School including child day-care centers, preschools, or a public or nonpublic primary school or secondary school (as defined in ORC 5104.01 and 2950.034);
- Church (as defined in ORC 1710.01);
- Public library (as defined in ORC Chapter 3375);
- Public Playground (including state or local government property); and
- Public Park (including state or local government property).

Include this cover page with the appropriate attachment.

Map may be divided into 8.5x11 page sections or may be folded to fit into an 8.5x11 packet.











Map must be clearly labeled and legible.

Pure OH LLC

Pure OH LLC Build Site

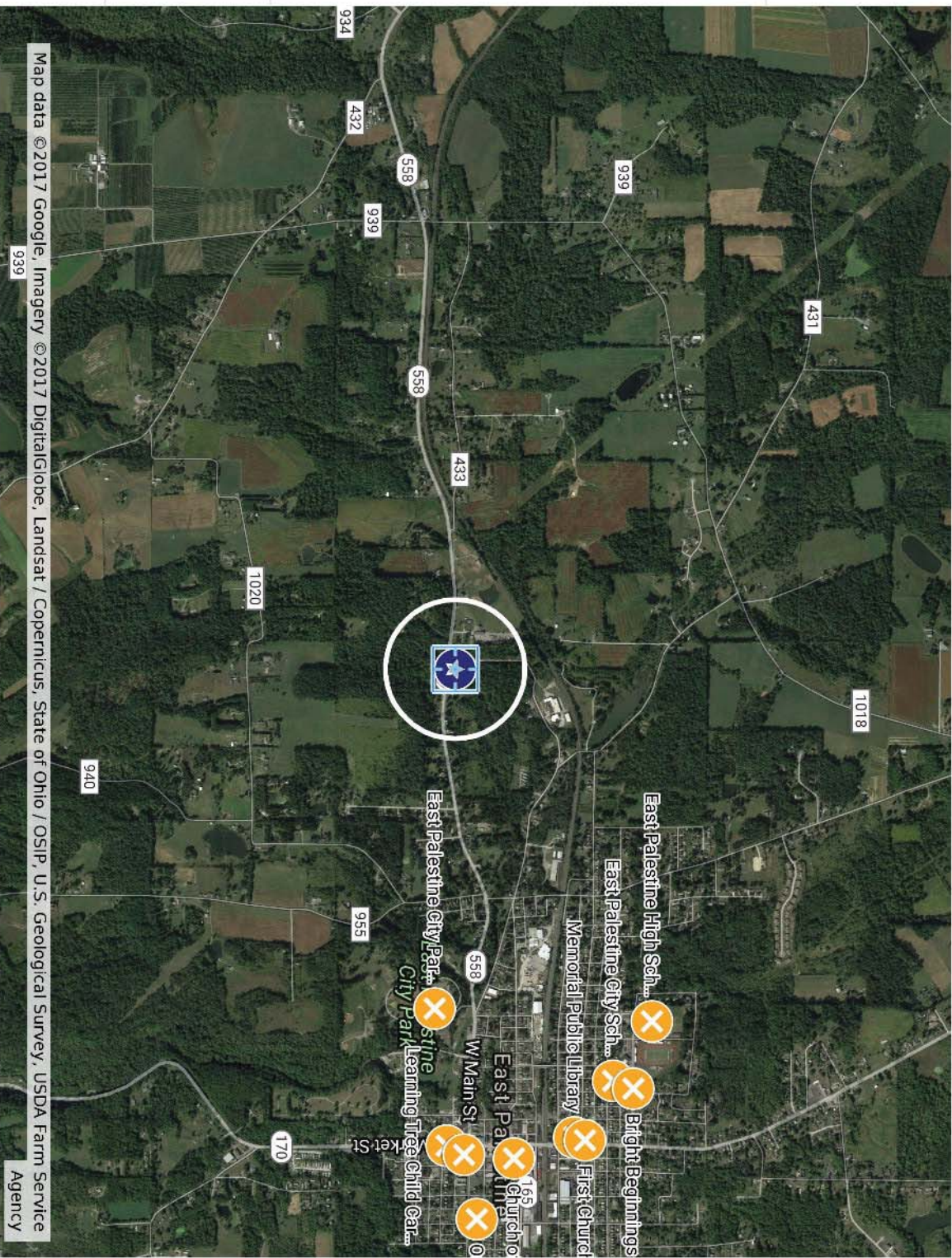
 OH-46 & Kemple Rd, East Palestine, OH 44413

Prohibited Facilities

-  Memorial Public Library
-  East Palestine High School
-  East Palestine City Schools
-  Bright Beginnings Preschool
-  Learning Tree Child Care
-  First Church of Christ
-  Church of the Nazarene
-  Our Lady of Lourdes
-  United Methodist Church
-  East Palestine City Park

1000 ft from Center of Property

-  Circle
-  center point



Map data © 2017 Google, Imagery © 2017 DigitalGlobe, Landsat / Copernicus, State of Ohio / OSIP, U.S. Geological Survey, USDA Farm Service Agency



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Medical Marijuana Control Program (MMCP)

1G Notice of Proper Zoning Form
3796:2-1-02(B)(2)(k)

Form with sections: To be Completed by Applicant (Name: PURE OH, LLC; Address: Bacon Avenue & Kemple Drive; City: East Palestine; County: Columbiana; State: Ohio; Zip Code: 44413); To be Completed by Zoning Authority or Local Government (Jurisdiction: East Palestine, Ohio); and Authorized Zoning Representative (Name: John Simon; Title: Building/Zoning Inspector).

Subscribed and sworn to before me this 4th day of JUNE, 2017.

Notary Public Steven M. Tigelman, State of Ohio, Commission Expires December 29, 2020. Includes notary seal and signature.



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Medical Marijuana Control Program (MMCP)

1H Zoning Permit Cover Page

3796:2-1-02(B)(2)(k)

Applicant has received local zoning approval and was issued a permit. Permit is attached after this cover page.

No permit is attached.
(Permit will be approved once applied for)

Mark one of the boxes above.

Include this form in application even if no permit is attached.



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Medical Marijuana Control Program (MMCP)

II Owners and Officers Roster Form

3796:2-1-02(B)(2)(e)

To be Completed by Applicant			
Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations:			
Pure OH LLC			
I certify, to the best of my knowledge, that the following requirements comply as to the date of the application:			
<input checked="" type="checkbox"/> No owner or officer is a physician who has been certified or applied for certification to recommend medical marijuana under Chapter 4731.30 of the Revised Code.			
<input checked="" type="checkbox"/> No owner or officer has ownership, financial interest, or a compensation arrangement with a laboratory licensed under Chapter 3796. of the Administrative Code or is an applicant for a license to conduct laboratory testing.			
I certify, that I acknowledge the following condition of the review of my application:			
<input checked="" type="checkbox"/> No owner or officer may have a financial interest in more than one provisional license or cultivator certificate of operation at any time (3796: 2-1-04(D)). If any owner or officer is included on more than one person’s application or entity’s application, the Department of Commerce will remove both applications from consideration.			
<i>Provide the following list for every individual who has an ownership interest or financial interest, either directly or indirectly through an entity, as defined in O.A.C. 3796:1-1-01, in the Applicant’s business or will directly or indirectly participate in the management of the operation. If the financial interest is in an entity, provide the individuals with an equity or profit interest in the entity. Attachment 1K is to be completed for each individual listed. Entries in the Identifier Legend column (Person A, Person B, etc.) must be used in place of an individual’s name if that individual is referenced in Section 2 of the application.</i>			
Identifier Legend	Name (First, Middle, Last)	Role	% Interest
<i>Ex: Person A</i>	<i>John Q. Public</i>	<i>Owner</i>	<i>5%</i>
CFO	Alan Michael Kane	Owner/Manager	7.5%
IT Director	Alan Scott Knitowski	Owner/Manager	1.8%
Brand Manager	Catherine Arakas Kenyon	Owner/Manager	1.5%
COO	Chelsey Elizabeth Joseph	Owner/Manager	7.5%
QC/QA Director	Gali Nuriel	Owner/Manager	70.0%
CEO	Jill Kathleen Lamoureux	Owner/Manager	8.7%



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1J Organizational Chart Cover Page

3796:2-1-02(B)(2)(e), 3796:2-1-03(B)(1)(b)

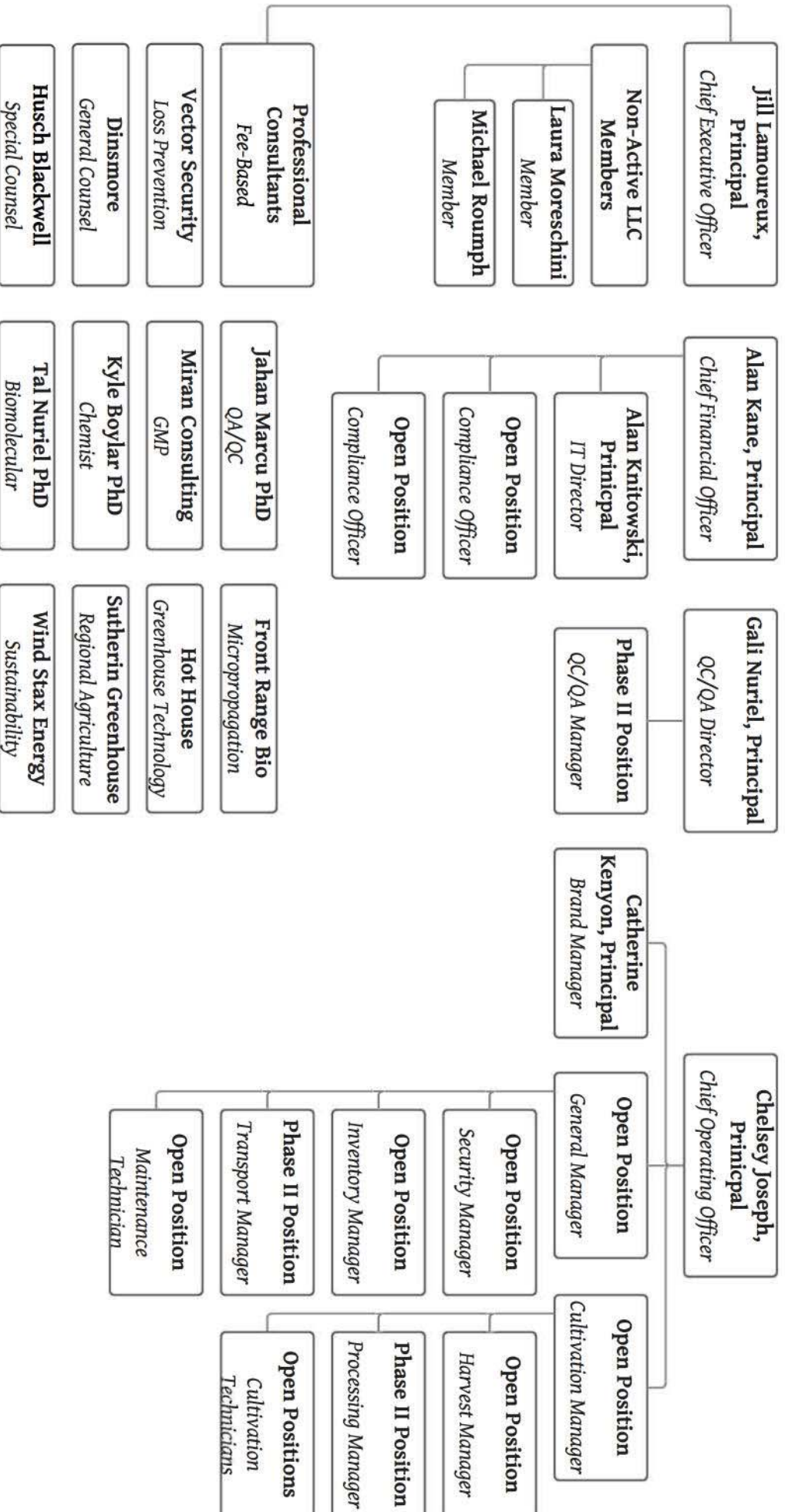
Submit an organizational chart of the proposed cultivation business. At a minimum, include representation of all principal officers, board members, and any other individual associated with the cultivation business.

Names on the organizational chart should match those listed on Attachment 1I.

Organizational chart should be represented on 8.5 x 11 pages and may use multiple pages to represent all individuals. Chart may be presented either in portrait or landscape views.

Chart should be clearly marked and legible.

Include this cover page.





Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1K Individual Background Information Form

(3796:2-1-02(B)(2), 3796:2-1-03(A))

To be Completed by each Individual Owner or Officer as listed on Attachment 11

Name of Individual: Chelsey E. Joseph; Date of birth: [redacted]

Title (if applicable): [redacted]; Role (Owner, Officer, etc.): owner / manager

Mailing Address: [redacted]

City: [redacted]; State: [redacted]; Zip Code: [redacted]

Phone Number: [redacted]; Email Address: chelsey@pure-om.com

- 7 checked boxes for authorization and certification statements regarding background checks, disqualifying offenses, physician status, ownership interests, financial interests, and information compliance.



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

referenced organizations harmless with respect to the disclosure herein. I certify under the penalties of perjury that I am the taxpayer identified below.

Signature: *Chelderly Joseph*

Date 6.13.17

Subscribed and sworn to before me this 13 day of June, 2017.

(SEAL)

Carly Rae Cutspec
NOTARY PUBLIC

CARLY RAE CUTSPEC
Notary Public
State of Colorado
Notary ID # 20174021355
My Commission Expires 05-18-2021



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

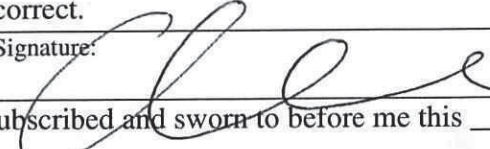
1K Individual Background Information Form

(3796:2-1-02(B)(2), 3796:2-1-03(A))

To be Completed by each Individual Owner or Officer as listed on Attachment 11

Name of Individual ALAN KANE		Date of birth: [REDACTED]
Title (if applicable)	Role (Owner, Officer, etc.)	
Mailing Address [REDACTED]		
City: [REDACTED]	State: [REDACTED]	Zip Code: [REDACTED]
Phone Number: [REDACTED]	Email Address: ALAN@PUREBRANDS.CO	

- I understand that the Department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program, I hereby authorize the release of any and all information of a confidential or privileged nature to the Department and its agents (3796:2-1-02(B)(2)(f)).
- I certify that I have not been convicted of any disqualifying offense as described in Chapter 3796 of the Ohio Administrative Code (3796:2-1-03(A)(2)(a)).
- I certify that I am not a physician who has been certified or applied for certification to recommend medical marijuana under Chapter 4731.30 of the Revised Code (3796:2-1-03(A)(2)(b)).
- I certify that I have no ownership investment interest, or a compensation arrangement with a laboratory licensed under Chapter 3796. of the Administrative Code or an applicant for a license to conduct laboratory testing (3796:2-1-03(A)(5)).
- I certify that I acknowledge that no owner or officer may have a financial interest in more than one provisional license or cultivator certificate of operation at any time (3796: 2-1-04(D)). If any owner or officer is included on more than one applicant's application, the Department will deny both applications.
- I certify that I am in compliance with all provisions of Chapter 3796. of the Administrative Code regarding prohibited license holders and that the information I have provided is true and correct.

Signature:  Date: 6/7/17

Subscribed and sworn to before me this 7 day of June, 2017.

(SEAL) VICTORIA SCHWIETERT
 NOTARY PUBLIC
 STATE OF COLORADO
 NOTARY ID 20154027881
 MY COMMISSION EXPIRES JULY 16, 2019


 NOTARY PUBLIC



Ohio Department of Commerce

Medical Marijuana Control Program (MMCP)

1K Individual Background Information Form

(3796:2-1-02(B)(2), 3796:2-1-03(A))

To be Completed by each Individual Owner or Officer as listed on Attachment 11

Name of Individual: Catherine Arakas Kenyon; Date of birth: [Redacted]

Title (if applicable): [Redacted]; Role (Owner, Officer, etc.): [Redacted]

Mailing Address: [Redacted]

City: [Redacted]; State: [Redacted]; Zip Code: [Redacted]

Phone Number: [Redacted]; Email Address: [Redacted]

I understand that the Department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program, I hereby authorize the release of any and all information of a confidential or privileged nature to the Department and its agents (3796:2-1-02(B)(2)(f)).

I certify that I have not been convicted of any disqualifying offense as described in Chapter 3796 of the Ohio Administrative Code (3796:2-1-03(A)(2)(a)).

I certify that I am not a physician who has been certified or applied for certification to recommend medical marijuana under Chapter 4731.30 of the Revised Code (3796:2-1-03(A)(2)(b)).

I certify that I have no ownership investment interest, or a compensation arrangement with a laboratory licensed under Chapter 3796. of the Administrative Code or an applicant for a license to conduct laboratory testing (3796:2-1-03(A)(5)).

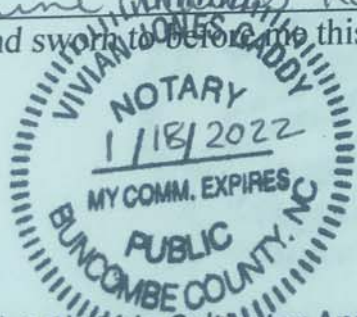
I certify that I acknowledge that no owner or officer may have a financial interest in more than one provisional license or cultivator certificate of operation at any time (3796: 2-1-04(D)). If any owner or officer is included on more than one applicant's application, the Department will deny both applications.

I certify that I am in compliance with all provisions of Chapter 3796. of the Administrative Code regarding prohibited license holders and that the information I have provided is true and correct.

Signature: Catherine Arakas Kenyon; Date: June 4, 2017

Subscribed and sworn to before me this 4 day of June, 2017.

(SEAL)



Signature: Vivian Jones Gaddy; NOTARY PUBLIC



Ohio Department of Commerce



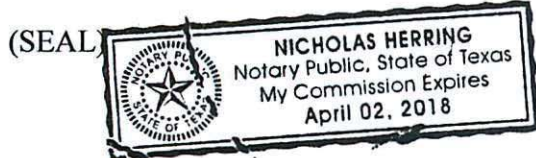
Medical Marijuana Control Program (MMCP)

1K Individual Background Information Form

(3796:2-1-02(B)(2), 3796:2-1-03(A))

To be Completed by each Individual Owner or Officer as listed on Attachment II		
Name of Individual <i>Alan S. Knitowski</i>		Date of birth: [REDACTED]
Title (if applicable)	Role (Owner, Officer, etc.)	
Mailing Address [REDACTED]		
City: [REDACTED]	State: [REDACTED]	Zip Code: [REDACTED]
Phone Number: [REDACTED]	Email Address: [REDACTED]	
<input checked="" type="checkbox"/> I understand that the Department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program, I hereby authorize the release of any and all information of a confidential or privileged nature to the Department and its agents (3796:2-1-02(B)(2)(f)). <input checked="" type="checkbox"/> I certify that I have not been convicted of any disqualifying offense as described in Chapter 3796 of the Ohio Administrative Code (3796:2-1-03(A)(2)(a)). <input checked="" type="checkbox"/> I certify that I am not a physician who has been certified or applied for certification to recommend medical marijuana under Chapter 4731.30 of the Revised Code (3796:2-1-03(A)(2)(b)). <input checked="" type="checkbox"/> I certify that I have no ownership investment interest, or a compensation arrangement with a laboratory licensed under Chapter 3796. of the Administrative Code or an applicant for a license to conduct laboratory testing (3796:2-1-03(A)(5)). <input checked="" type="checkbox"/> I certify that I acknowledge that no owner or officer may have a financial interest in more than one provisional license or cultivator certificate of operation at any time (3796: 2-1-04(D)). If any owner or officer is included on more than one applicant's application, the Department will deny both applications. <input checked="" type="checkbox"/> I certify that I am in compliance with all provisions of Chapter 3796. of the Administrative Code regarding prohibited license holders and that the information I have provided is true and correct.		
Signature: <i>Alan S. Knitowski</i>	Date: <i>06/07/2017</i>	

Subscribed and sworn to before me this 7th day of June, 20 17.



[Signature]
NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1K Individual Background Information Form

(3796:2-1-02(B)(2), 3796:2-1-03(A))

To be Completed by each Individual Owner or Officer as listed on Attachment 1I			
Name of Individual Jill K Lamoureux		Date of birth: [REDACTED]	
Title (if applicable) CEO		Role (Owner, Officer, etc.) Owner/Manager	
Mailing Address [REDACTED]			
City: [REDACTED]	State: [REDACTED]	Zip Code: [REDACTED]	
Phone Number: [REDACTED]	Email Address: jill@pure-om.com		
<input checked="" type="checkbox"/> I understand that the Department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program, I hereby authorize the release of any and all information of a confidential or privileged nature to the Department and its agents (3796:2-1-02(B)(2)(f)).			
<input checked="" type="checkbox"/> I certify that I have not been convicted of any disqualifying offense as described in Chapter 3796 of the Ohio Administrative Code (3796:2-1-03(A)(2)(a)).			
<input checked="" type="checkbox"/> I certify that I am not a physician who has been certified or applied for certification to recommend medical marijuana under Chapter 4731.30 of the Revised Code (3796:2-1-03(A)(2)(b)).			
<input checked="" type="checkbox"/> I certify that I have no ownership investment interest, or a compensation arrangement with a laboratory licensed under Chapter 3796. of the Administrative Code or an applicant for a license to conduct laboratory testing (3796:2-1-03(A)(5)).			
<input checked="" type="checkbox"/> I certify that I acknowledge that no owner or officer may have a financial interest in more than one provisional license or cultivator certificate of operation at any time (3796: 2-1-04(D)). If any owner or officer is included on more than one applicant's application, the Department will deny both applications.			
<input checked="" type="checkbox"/> I certify that I am in compliance with all provisions of Chapter 3796. of the Administrative Code regarding prohibited license holders and that the information I have provided is true and correct.			
<input checked="" type="checkbox"/> I hereby authorize the Ohio Department of Taxation and any of its agents and/or employees to release information to the Ohio Department of Commerce. These records and information shall be limited to the information obtained and maintained by the Ohio Department of Taxation and shall not contain any federal tax information as defined in I.R.C. 6103 and received from the Internal Revenue Service. I expressly waive the confidentiality provisions of the Ohio Revised Code, which would otherwise prohibit disclosure, and agree to hold the above-			



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

referenced organizations harmless with respect to the disclosure herein. I certify under the penalties of perjury that I am the taxpayer identified below.

Signature:

[Handwritten signature]

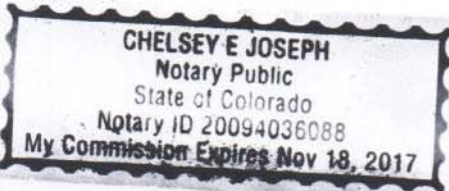
Date

Subscribed and sworn to before me this 9th day of June, 20 17.

(SEAL)

Chelsey E Joseph

NOTARY PUBLIC





Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1K Individual Background Information Form

(3796.2-1-02)(B)(2), 3796.2-1-03(A)

To be Completed by each Individual Owner or Officer as listed on Attachment II

Name of Individual: LAURIE HUNTER MORSCHIN

Title (if applicable): [Redacted] Role (Owner, Officer, etc.): [Redacted]

Address: [Redacted]

City: [Redacted] State: [Redacted] Zip: [Redacted]

Phone Number: [Redacted] Email: [Redacted]

I understand that the Department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program, I hereby authorize the release of any and all information of a confidential or privileged nature to the Department and its agents (3796.2-1-02)(B)(2)(b).

I certify that I have not been convicted of any disqualifying offense as described in Chapter 3796 of the Ohio Administrative Code (3796.2-1-03)(A)(2)(a).

I certify that I am not a physician who has been certified or applied for certification to recommend medical marijuana under Chapter 4731.50 of the Revised Code (3796.2-1-03)(A)(2)(b)(i).

I certify that I have no ownership investment interest, or a compensation arrangement with a laboratory licensed under Chapter 3796 of the Administrative Code or an applicant for a license to conduct laboratory testing (3796.2-1-03)(A)(5).

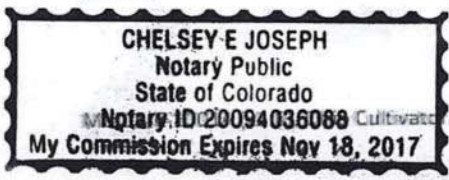
I certify that I acknowledge that no owner or officer may have a financial interest in more than one provisional license or cultivator certificate of operation at any time (3796.2-1-04)(D). If any owner or officer is included on more than one applicant's application, the Department will deny both applications.

I certify that I am in compliance with all provisions of Chapter 3796 of the Administrative Code regarding prohibited license holders and that the information I have provided is true and correct.

Signature: Laurie Hunter Morschin Date: 6-14-17

Subscribed and sworn to before me this 14th day of June, 2017.

Chelsey Joseph
NOTARY PUBLIC





Ohio Department of Commerce



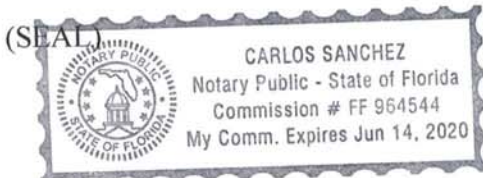
Medical Marijuana Control Program (MMCP)

1K Individual Background Information Form

(3796:2-1-02(B)(2), 3796:2-1-03(A))

To be Completed by each Individual Owner or Officer as listed on Attachment 11		
Name of Individual Gal Nuriel		Date of birth: [Redacted]
Title (if applicable)	Role (Owner, Officer, etc.)	
Mailing Address [Redacted]		
City: [Redacted]	State: [Redacted]	Zip Code: [Redacted]
Phone Number: [Redacted]	Email Address: [Redacted]	
<input checked="" type="checkbox"/> I understand that the Department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program, I hereby authorize the release of any and all information of a confidential or privileged nature to the Department and its agents (3796:2-1-02(B)(2)(f)). <input checked="" type="checkbox"/> I certify that I have not been convicted of any disqualifying offense as described in Chapter 3796 of the Ohio Administrative Code (3796:2-1-03(A)(2)(a)). <input checked="" type="checkbox"/> I certify that I am not a physician who has been certified or applied for certification to recommend medical marijuana under Chapter 4731.30 of the Revised Code (3796:2-1-03(A)(2)(b)). <input checked="" type="checkbox"/> I certify that I have no ownership investment interest, or a compensation arrangement with a laboratory licensed under Chapter 3796. of the Administrative Code or an applicant for a license to conduct laboratory testing (3796:2-1-03(A)(5)). <input checked="" type="checkbox"/> I certify that I acknowledge that no owner or officer may have a financial interest in more than one provisional license or cultivator certificate of operation at any time (3796: 2-1-04(D)). If any owner or officer is included on more than one applicant's application, the Department will deny both applications. <input checked="" type="checkbox"/> I certify that I am in compliance with all provisions of Chapter 3796. of the Administrative Code regarding prohibited license holders and that the information I have provided is true and correct.		
Signature: 		Date 6-8-2017

Subscribed and sworn to before me this 8 day of June, 2017.



NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1K Individual Background Information Form

(3796:2-1-02(B)(2), 3796:2-1-03(A))

To be Completed by each Individual Owner or Officer as listed on Attachment II

Name of Individual: MIKE ROLMPH Date of birth: [Redacted]

Title (if applicable): Role (Owner, Officer, etc.):

Mailing Address: [Redacted]

City: [Redacted] State: [Redacted] Zip Code: [Redacted]

Phone Number: [Redacted] Email Address: [Redacted]

- I understand that the Department may review criminal background records...
I certify that I have not been convicted of any disqualifying offense...
I certify that I am not a physician who has been certified or applied for certification...
I certify that I have no ownership investment interest...
I certify that I acknowledge that no owner or officer may have a financial interest...
I certify that I am in compliance with all provisions of Chapter 3796...

Signature: [Handwritten Signature] Date: 6/10/17

Subscribed and sworn to before me this 10 day of June, 2017.



[Handwritten Signature]
NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1L Business in Other Jurisdictions Form

3796:2-1-02(B)(2)(g)

To be Completed by Applicant			
Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations: <i>Chelsey E. Joseph</i>			
Provide information regarding all other medical marijuana licenses, permits, or registrations ever held, current or expired, by the Applicant in any other U.S. jurisdiction (Attach copies of this form to list any additional entities):			
State	Type	Dates of Issue/Expiration	Number
<input checked="" type="checkbox"/> I certify that, to the best of my knowledge, no owner or officer has received any revocation or suspension for any licensure related to the distribution of marijuana.(3796:2-1-02(B)(2)(j)(iii))			
<input checked="" type="checkbox"/> I hereby specifically grant permission to the above listed states or jurisdictions and their licensing agency or authority to release to the Ohio Medical Marijuana Control Program any and all information relating to the application, licensure or authorization to produce or otherwise deal in the distribution of marijuana in any form, including the following: <ol style="list-style-type: none"> Any denial, suspension, revocation or other significant sanction of the application, license, or authorization, and A copy of documentation so indicating; or A statement that the applicant was so licensed or authorized and was never sanctioned. (3796:2-1-02(B)(2)(j)(ii)) 			
<input checked="" type="checkbox"/> I certify that, to the best of my knowledge, the attached documentation indicates proof of tax compliance for individuals and businesses at the state level for all jurisdictions outside the State of Ohio in which applicant has operated as a business. Acceptable documentation includes tax summary pages or a valid certification indicating tax compliance issued by the appropriate taxation authority. This documentation shall be provided for every person or entity with a financial interest of one percent or greater in the applicant covering the three years before the filing of the application. **Please note that any information provided by the applicant, including tax returns from other jurisdictions, would be considered a "public record" as defined in R.C. 149.43(A)(1).**			



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

<i>Chel... ..</i>	
Signature:	Date June 13 th , 2017

Subscribed and sworn to before me this 13 day of June, 2017.

(SEAL)

Carly Rae Cutspec

 NOTARY PUBLIC

CARLY RAE CUTSPEC
 Notary Public
 State of Colorado
 Notary ID # 20174021355
 My Commission Expires 05-18-2021



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Cultivator Application – Financial Interest Tax Processing Form

Applicant Name: Pure OH, LLC

Applicant Number (if applicable): _____

Taxpayer Name: Chelsey Elizabeth Joseph

Taxpayer Address: [REDACTED]

Taxpayer FEIN/SSN: [REDACTED]

The above-named Taxpayer hereby authorize the Ohio Department of Taxation (“Department”) and any of its agents and/or employees to release information to the Department of Commerce. This information shall be limited to information obtained and maintained by the Ohio Department of Taxation and shall not contain any federal tax information as defined in I.R.C. 6103 and received from the Internal Revenue Service. Taxpayer expressly waives the confidentiality provisions of the Ohio Revised Code which would otherwise prohibit disclosure, and agrees to hold the Department harmless with respect to the disclosure herein.

By signing, I certify that, to the best of my knowledge, the documentation provided with Form 1L and/or Form 1N indicates proof of tax compliance for individuals and businesses at the state level for all jurisdictions outside the State of Ohio in which Taxpayer applicant has operated as a business. Acceptable documentation includes tax summary pages or a valid certification indicating tax compliance issued by the appropriate taxation authority. This documentation shall be provided for every person or entity with a financial interest of one percent or greater in the applicant covering the three years before the filing of the application. **Please note that any information provided by the applicant, including tax returns from other jurisdictions, would be considered a “public record” as defined in R.C. 149.43(A)(1).**

If Taxpayer has a financial interest or had a financial interest within the last three years in a medical marijuana entity operating outside the State of Ohio, please list the applicable information below.

Legal Business Name	FEIN	Address

[SEE OTHER SIDE TO COMPLETE FORM]



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

If Taxpayer has a controlling financial interest or had a controlling financial interest within the last three years in a business in an industry unrelated to marijuana, please list the applicable information below.

Legal Business Name	FEIN	Address
Chelsey & Company, LLC	[REDACTED]	[REDACTED]

* If inadequate space is provided on this form, the Taxpayer shall provide the additional information on a separate form that clearly articulates and legibly states the information requested in this form.

I certify under penalties of perjury that I have the authority to legally bind the Taxpayer to this Authorization.

Name and Title of Taxpayer: Chelsey Joseph

Signature: Chelsey Joseph Date: 6.14.17

Taxpayer Telephone Number: [REDACTED]

Please send the completed form to:

Ohio Department of Commerce
Attn: MMCP Program
77 S. High Street, 23rd Floor
Columbus, OH 43215




Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1L Business in Other Jurisdictions Form

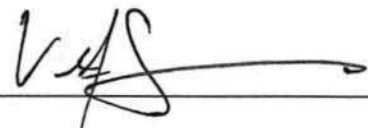
3796:2-1-02(B)(2)(g)

To be Completed by Applicant			
Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations: Pure OH LLC			
Provide information regarding all other medical marijuana licenses, permits, or registrations ever held, current or expired, by the Applicant in any other U.S. jurisdiction (Attach copies of this form to list any additional entities):			
State	Type	Dates of Issue/Expiration	Number
<input checked="" type="checkbox"/> I certify that, to the best of my knowledge, no owner or officer has received any revocation or suspension for any licensure related to the distribution of marijuana.(3796:2-1-02(B)(2)(j)(iii)) <input checked="" type="checkbox"/> I hereby specifically grant permission to the above listed states or jurisdictions and their licensing agency or authority to release to the Ohio Medical Marijuana Control Program any and all information relating to the application, licensure or authorization to produce or otherwise deal in the distribution of marijuana in any form, including the following: a. Any denial, suspension, revocation or other significant sanction of the application, license, or authorization, and b. A copy of documentation so indicating; or c. A statement that the applicant was so licensed or authorized and was never sanctioned. (3796:2-1-02(B)(2)(j)(ii))			
Signature: 		Date: 6/7/17	

Subscribed and sworn to before me this 7 day of June, 2017.

(SEAL)

VICTORIA SCHWIETERT
 NOTARY PUBLIC
 STATE OF COLORADO
 NOTARY ID 20154027881
 MY COMMISSION EXPIRES JULY 16, 2019



 NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Cultivator Application – Financial Interest Tax Processing Form

Applicant Name: Pure OH LLC

Applicant Number (if applicable):

Taxpayer Name: Alan M. Kane

Taxpayer Address: [REDACTED]

Taxpayer FEIN/SSN: [REDACTED]

The above-named Taxpayer hereby authorize the Ohio Department of Taxation (“Department”) and any of its agents and/or employees to release information to the Department of Commerce. This information shall be limited to information obtained and maintained by the Ohio Department of Taxation and shall not contain any federal tax information as defined in I.R.C. 6103 and received from the Internal Revenue Service. Taxpayer expressly waives the confidentiality provisions of the Ohio Revised Code which would otherwise prohibit disclosure, and agrees to hold the Department harmless with respect to the disclosure herein.

By signing, I certify that, to the best of my knowledge, the documentation provided with Form 1L and/or Form 1N indicates proof of tax compliance for individuals and businesses at the state level for all jurisdictions outside the State of Ohio in which Taxpayer applicant has operated as a business. Acceptable documentation includes tax summary pages or a valid certification indicating tax compliance issued by the appropriate taxation authority. This documentation shall be provided for every person or entity with a financial interest of one percent or greater in the applicant covering the three years before the filing of the application. **Please note that any information provided by the applicant, including tax returns from other jurisdictions, would be considered a “public record” as defined in R.C. 149.43(A)(1).**

If Taxpayer has a financial interest or had a financial interest within the last three years in a medical marijuana entity operating outside the State of Ohio, please list the applicable information below.

Table with 3 columns: Legal Business Name, FEIN, Address. Row 1 contains 'N/A', other rows are empty.

[SEE OTHER SIDE TO COMPLETE FORM]

Handwritten signature



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

If Taxpayer has a controlling financial interest or had a controlling financial interest within the last three years in a business in an industry unrelated to marijuana, please list the applicable information below.

Table with 3 columns: Legal Business Name, FEIN, Address. Row 1 contains 'N/A'.

* If inadequate space is provided on this form, the Taxpayer shall provide the additional information on a separate form that clearly articulates and legibly states the information requested in this form.

I certify under penalties of perjury that I have the authority to legally bind the Taxpayer to this Authorization.

Name and Title of Taxpayer: Alan M. Kane, Member

Signature: [Handwritten Signature] Date: 6/12/17

Taxpayer Telephone Number: [Redacted]

Please send the completed form to:

Ohio Department of Commerce
Attn: MMCP Program
77 S. High Street, 23rd Floor
Columbus, OH 43215

[Handwritten Signature]



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1L Business in Other Jurisdictions Form

3796:2-1-02(B)(2)(g)

To be Completed by Applicant

Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations:

Catherine A. Kenyon - Pure OH LLC

Provide information regarding all other medical marijuana licenses, permits, or registrations ever held, current or expired, by the Applicant in any other U.S. jurisdiction (Attach copies of this form to list any additional entities):

State	Type	Dates of Issue/Expiration	Number
N/A			

I certify that, to the best of my knowledge, no owner or officer has received any revocation or suspension for any licensure related to the distribution of marijuana.(3796:2-1-02(B)(2)(j)(iii))

I hereby specifically grant permission to the above listed states or jurisdictions and their licensing agency or authority to release to the Ohio Medical Marijuana Control Program any and all information relating to the application, licensure or authorization to produce or otherwise deal in the distribution of marijuana in any form, including the following:

- a. Any denial, suspension, revocation or other significant sanction of the application, license, or authorization, and
- b. A copy of documentation so indicating; or
- c. A statement that the applicant was so licensed or authorized and was never sanctioned. (3796:2-1-02(B)(2)(j)(ii))

Signature:

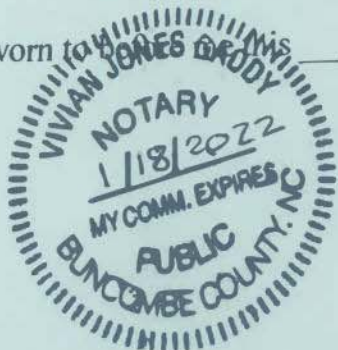
Catherine Araliss Kenyon

Date

6/1/17

Subscribed and sworn to by _____ 4 day of June, 20 17.

(SEAL)



Vivian Jones Gaddy

NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Cultivator Application – Financial Interest Tax Processing Form

Applicant Name: Pure OH LLC

Applicant Number (if applicable):

Taxpayer Name: Catherine A. Kenyon

Taxpayer Address:

Taxpayer FEIN/SSN:

The above-named Taxpayer hereby authorize the Ohio Department of Taxation (“Department”) and any of its agents and/or employees to release information to the Department of Commerce. This information shall be limited to information obtained and maintained by the Ohio Department of Taxation and shall not contain any federal tax information as defined in I.R.C. 6103 and received from the Internal Revenue Service. Taxpayer expressly waives the confidentiality provisions of the Ohio Revised Code which would otherwise prohibit disclosure, and agrees to hold the Department harmless with respect to the disclosure herein.

By signing, I certify that, to the best of my knowledge, the documentation provided with Form 1L and/or Form 1N indicates proof of tax compliance for individuals and businesses at the state level for all jurisdictions outside the State of Ohio in which Taxpayer applicant has operated as a business. Acceptable documentation includes tax summary pages or a valid certification indicating tax compliance issued by the appropriate taxation authority. This documentation shall be provided for every person or entity with a financial interest of one percent or greater in the applicant covering the three years before the filing of the application. **Please note that any information provided by the applicant, including tax returns from other jurisdictions, would be considered a “public record” as defined in R.C. 149.43(A)(1).**

If Taxpayer has a financial interest or had a financial interest within the last three years in a medical marijuana entity operating outside the State of Ohio, please list the applicable information below.

Table with 3 columns: Legal Business Name, FEIN, Address. Row 1 contains 'N/A'.

[SEE OTHER SIDE TO COMPLETE FORM]



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

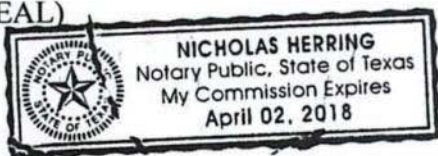
1L Business in Other Jurisdictions Form

3796:2-1-02(B)(2)(g)

To be Completed by Applicant			
Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations: Alan S. Knitowski - Pure OH LLC			
Provide information regarding all other medical marijuana licenses, permits, or registrations ever held, current or expired, by the Applicant in any other U.S. jurisdiction (Attach copies of this form to list any additional entities):			
State	Type	Dates of Issue/Expiration	Number
N/A			
<input checked="" type="checkbox"/> I certify that, to the best of my knowledge, no owner or officer has received any revocation or suspension for any licensure related to the distribution of marijuana.(3796:2-1-02(B)(2)(j)(iii)) <input checked="" type="checkbox"/> I hereby specifically grant permission to the above listed states or jurisdictions and their licensing agency or authority to release to the Ohio Medical Marijuana Control Program any and all information relating to the application, licensure or authorization to produce or otherwise deal in the distribution of marijuana in any form, including the following: a. Any denial, suspension, revocation or other significant sanction of the application, license, or authorization, and b. A copy of documentation so indicating; or c. A statement that the applicant was so licensed or authorized and was never sanctioned. (3796:2-1-02(B)(2)(j)(ii))			
Signature: <i>Alan S. Knitowski</i>		Date: 06/07/2017	

Subscribed and sworn to before me this 7th day of June, 2017.

(SEAL)



Nicholas Herring
NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Cultivator Application – Financial Interest Tax Processing Form

Applicant Name: Pure OH LLC

Applicant Number (if applicable):

Taxpayer Name: Alan S. Knitowski

Taxpayer Address:

Taxpayer FEIN/SSN:

The above-named Taxpayer hereby authorize the Ohio Department of Taxation (“Department”) and any of its agents and/or employees to release information to the Department of Commerce. This information shall be limited to information obtained and maintained by the Ohio Department of Taxation and shall not contain any federal tax information as defined in I.R.C. 6103 and received from the Internal Revenue Service. Taxpayer expressly waives the confidentiality provisions of the Ohio Revised Code which would otherwise prohibit disclosure, and agrees to hold the Department harmless with respect to the disclosure herein.

By signing, I certify that, to the best of my knowledge, the documentation provided with Form 1L and/or Form 1N indicates proof of tax compliance for individuals and businesses at the state level for all jurisdictions outside the State of Ohio in which Taxpayer applicant has operated as a business. Acceptable documentation includes tax summary pages or a valid certification indicating tax compliance issued by the appropriate taxation authority. This documentation shall be provided for every person or entity with a financial interest of one percent or greater in the applicant covering the three years before the filing of the application. **Please note that any information provided by the applicant, including tax returns from other jurisdictions, would be considered a “public record” as defined in R.C. 149.43(A)(1).**

If Taxpayer has a financial interest or had a financial interest within the last three years in a medical marijuana entity operating outside the State of Ohio, please list the applicable information below.

Legal Business Name	FEIN	Address
N/A		

[SEE OTHER SIDE TO COMPLETE FORM]





Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

If Taxpayer has a controlling financial interest or had a controlling financial interest within the last three years in a business in an industry unrelated to marijuana, please list the applicable information below.

Legal Business Name	FEIN	Address
N/A		

* If inadequate space is provided on this form, the Taxpayer shall provide the additional information on a separate form that clearly articulates and legibly states the information requested in this form.

I certify under penalties of perjury that I have the authority to legally bind the Taxpayer to this Authorization.

Name and Title of Taxpayer: Alan S. Knitowski, Member

Signature: [Handwritten Signature] Date: 6/12/2017

Taxpayer Telephone Number: [Redacted]

Please send the completed form to:

Ohio Department of Commerce
Attn: MMCP Program
77 S. High Street, 23rd Floor
Columbus, OH 43215





Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1L Business in Other Jurisdictions Form

3796:2-1-02(B)(2)(g)

To be Completed by Applicant			
Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations: Jill K Lamoureux			
Provide information regarding all other medical marijuana licenses, permits, or registrations ever held, current or expired, by the Applicant in any other U.S. jurisdiction (Attach copies of this form to list any additional entities):			
State	Type	Dates of Issue/Expiration	Number
CO	Associated Key Ownership	08/2010 - 10/2015	M00672
NV	Establishment Agent Ownership	05/2016 - Current	1708005782; 1708005785; and 1708005787.
IL	Minority Interest Ownership	09/2014 - Current	1503060740; 1503060741, and 1503060739
<input checked="" type="checkbox"/> I certify that, to the best of my knowledge, no owner or officer has received any revocation or suspension for any licensure related to the distribution of marijuana.(3796:2-1-02(B)(2)(j)(iii)) <input checked="" type="checkbox"/> I hereby specifically grant permission to the above listed states or jurisdictions and their licensing agency or authority to release to the Ohio Medical Marijuana Control Program any and all information relating to the application, licensure or authorization to produce or otherwise deal in the distribution of marijuana in any form, including the following: a. Any denial, suspension, revocation or other significant sanction of the application, license, or authorization, and b. A copy of documentation so indicating; or c. A statement that the applicant was so licensed or authorized and was never sanctioned. (3796:2-1-02(B)(2)(j)(ii))			
Signature: 		Date 6/9/17	

Subscribed and sworn to before me this 9th day of June, 2017.

(SEAL) **CHRISTOPHER M DAISS**
 NOTARY PUBLIC - STATE OF COLORADO
 Notary Identification #20164044892
 My Commission Expires 11/28/2020

 NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Cultivator Application – Financial Interest Tax Processing Form

Applicant Name: Pure OH LLC

Applicant Number (if applicable):

Taxpayer Name: Jill K Lamoureux

Taxpayer Address:

Taxpayer FEIN/SSN:

The above-named Taxpayer hereby authorize the Ohio Department of Taxation (“Department”) and any of its agents and/or employees to release information to the Department of Commerce. This information shall be limited to information obtained and maintained by the Ohio Department of Taxation and shall not contain any federal tax information as defined in I.R.C. 6103 and received from the Internal Revenue Service. Taxpayer expressly waives the confidentiality provisions of the Ohio Revised Code which would otherwise prohibit disclosure, and agrees to hold the Department harmless with respect to the disclosure herein.

By signing, I certify that, to the best of my knowledge, the documentation provided with Form 1L and/or Form 1N indicates proof of tax compliance for individuals and businesses at the state level for all jurisdictions outside the State of Ohio in which Taxpayer applicant has operated as a business. Acceptable documentation includes tax summary pages or a valid certification indicating tax compliance issued by the appropriate taxation authority. This documentation shall be provided for every person or entity with a financial interest of one percent or greater in the applicant covering the three years before the filing of the application. **Please note that any information provided by the applicant, including tax returns from other jurisdictions, would be considered a “public record” as defined in R.C. 149.43(A)(1).**

If Taxpayer has a financial interest or had a financial interest within the last three years in a medical marijuana entity operating outside the State of Ohio, please list the applicable information below.

Legal Business Name	FEIN	Address
Boulder County Caregivers LLC		
Wellness Connection of Nevada LLC		
Cresco Labs LLC		

[SEE OTHER SIDE TO COMPLETE FORM]



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

If Taxpayer has a controlling financial interest or had a controlling financial interest within the last three years in a business in an industry unrelated to marijuana, please list the applicable information below.

Table with 3 columns: Legal Business Name, FEIN, Address. Rows include ALL, LLC; Dirty Business Ltd; FVS, LLC.

* If inadequate space is provided on this form, the Taxpayer shall provide the additional information on a separate form that clearly articulates and legibly states the information requested in this form.

I certify under penalties of perjury that I have the authority to legally bind the Taxpayer to this Authorization.

Name and Title of Taxpayer: Jill K. Lamoureux, Member

Signature: [Handwritten Signature] Date: 06/12/2017

Taxpayer Telephone Number: [Redacted]

Please send the completed form to:

Ohio Department of Commerce
Attn: MMCP Program
77 S. High Street, 23rd Floor
Columbus, OH 43215



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

II. Business in Other Jurisdictions Form

3796.2-1-02(B)(2)(g)

To be Completed by Applicant

Name of Individual or Entity Applying for a Medical Marijuana Certificate/Certificate of Operations:
LATWITA HOWTER MOURSCHEINI

Provide information regarding all other medical marijuana licenses, permits, or registrations ever held, current or expired, by the Applicant in any other U.S. jurisdiction (Attach copies of this form to list any additional entities).

State	Type	Dates of Issue/Expiration	Number

I certify that, to the best of my knowledge, no owner or officer has received any revocation or suspension for any licensure related to the distribution of marijuana. (3796.2-1-02(B)(2)(g)(ii))

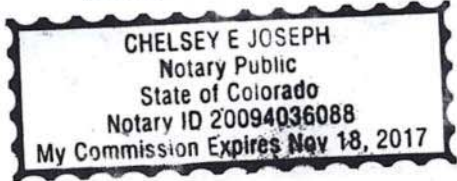
I hereby specifically grant permission to the above listed states or jurisdictions and their licensing agency or authority to release to the Ohio Medical Marijuana Control Program any and all information relating to the application, licensure or authorization to produce or otherwise deal in the distribution of marijuana in any form, including the following:

- Any denial, suspension, revocation or other significant sanction of the application, license, or authorization, and
- A copy of documentation so indicating; or
- A statement that the applicant was so licensed or authorized and was never sanctioned. (3796.2-1-02(B)(2)(g)(iii))

Signature: **Laura Hunter Muschene** Date: **6.14.17**

Subscribed and sworn to before me this 14th day of June, 2017.

(SEAL)



Chelsea E. Joseph
NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Cultivator Application – Financial Interest Tax Processing Form

Applicant Name: Pure OH LLC

Applicant Number (if applicable):

Taxpayer Name: LAURA WODZESCHINE

Taxpayer Address: [Redacted]

Taxpayer FEIN/SSN: [Redacted]

The above-named Taxpayer hereby authorize the Ohio Department of Taxation (“Department”) and any of its agents and/or employees to release information to the Department of Commerce. This information shall be limited to information obtained and maintained by the Ohio Department of Taxation and shall not contain any federal tax information as defined in I.R.C. 6103 and received from the Internal Revenue Service. Taxpayer expressly waives the confidentiality provisions of the Ohio Revised Code which would otherwise prohibit disclosure, and agrees to hold the Department harmless with respect to the disclosure herein.

By signing, I certify that, to the best of my knowledge, the documentation provided with Form 1L and/or Form 1N indicates proof of tax compliance for individuals and businesses at the state level for all jurisdictions outside the State of Ohio in which Taxpayer applicant has operated as a business. Acceptable documentation includes tax summary pages or a valid certification indicating tax compliance issued by the appropriate taxation authority. This documentation shall be provided for every person or entity with a financial interest of one percent or greater in the applicant covering the three years before the filing of the application. **Please note that any information provided by the applicant, including tax returns from other jurisdictions, would be considered a “public record” as defined in R.C. 149.43(A)(1).**

If Taxpayer has a financial interest or had a financial interest within the last three years in a medical marijuana entity operating outside the State of Ohio, please list the applicable information below.

Table with 3 columns: Legal Business Name, FEIN, Address. Row 1 contains 'N/A'.

[SEE OTHER SIDE TO COMPLETE FORM]



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

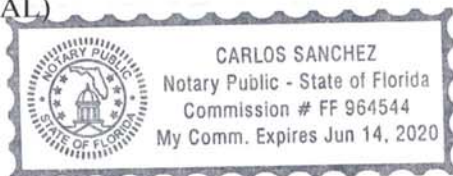
1L Business in Other Jurisdictions Form

3796:2-1-02(B)(2)(g)

To be Completed by Applicant			
Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations: Gal Nuriel			
Provide information regarding all other medical marijuana licenses, permits, or registrations ever held, current or expired, by the Applicant in any other U.S. jurisdiction (Attach copies of this form to list any additional entities):			
State	Type	Dates of Issue/Expiration	Number
FL	Cultivation & Dispensing License	Issued: April 4, 2016	1 License
<input checked="" type="checkbox"/> I certify that, to the best of my knowledge, no owner or officer has received any revocation or suspension for any licensure related to the distribution of marijuana.(3796:2-1-02(B)(2)(j)(iii)) <input checked="" type="checkbox"/> I hereby specifically grant permission to the above listed states or jurisdictions and their licensing agency or authority to release to the Ohio Medical Marijuana Control Program any and all information relating to the application, licensure or authorization to produce or otherwise deal in the distribution of marijuana in any form, including the following: a. Any denial, suspension, revocation or other significant sanction of the application, license, or authorization, and b. A copy of documentation so indicating; or c. A statement that the applicant was so licensed or authorized and was never sanctioned. (3796:2-1-02(B)(2)(j)(ii))			
Signature: 		Date 6-8-2017	

Subscribed and sworn to before me this 8 day of June, 2017.

(SEAL)



NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Cultivator Application – Financial Interest Tax Processing Form

Applicant Name: Pure OH LLC

Applicant Number (if applicable):

Taxpayer Name: Gali Nuriel

Taxpayer Address:

Taxpayer FEIN/SSN:

The above-named Taxpayer hereby authorize the Ohio Department of Taxation (“Department”) and any of its agents and/or employees to release information to the Department of Commerce. This information shall be limited to information obtained and maintained by the Ohio Department of Taxation and shall not contain any federal tax information as defined in I.R.C. 6103 and received from the Internal Revenue Service. Taxpayer expressly waives the confidentiality provisions of the Ohio Revised Code which would otherwise prohibit disclosure, and agrees to hold the Department harmless with respect to the disclosure herein.

By signing, I certify that, to the best of my knowledge, the documentation provided with Form 1L and/or Form 1N indicates proof of tax compliance for individuals and businesses at the state level for all jurisdictions outside the State of Ohio in which Taxpayer applicant has operated as a business. Acceptable documentation includes tax summary pages or a valid certification indicating tax compliance issued by the appropriate taxation authority. This documentation shall be provided for every person or entity with a financial interest of one percent or greater in the applicant covering the three years before the filing of the application. **Please note that any information provided by the applicant, including tax returns from other jurisdictions, would be considered a “public record” as defined in R.C. 149.43(A)(1).**

If Taxpayer has a financial interest or had a financial interest within the last three years in a medical marijuana entity operating outside the State of Ohio, please list the applicable information below.

Legal Business Name	FEIN	Address
San Felasco Nurseries, Inc. d/b/a Grandfloria		

[SEE OTHER SIDE TO COMPLETE FORM]



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

If Taxpayer has a controlling financial interest or had a controlling financial interest within the last three years in a business in an industry unrelated to marijuana, please list the applicable information below.

Table with 3 columns: Legal Business Name, FEIN, Address. Rows include Platinum LLC, Idingo LLC, and Idingo INC.

* If inadequate space is provided on this form, the Taxpayer shall provide the additional information on a separate form that clearly articulates and legibly states the information requested in this form.

I certify under penalties of perjury that I have the authority to legally bind the Taxpayer to this Authorization.

Name and Title of Taxpayer: Gali Nuriel

Signature: [Handwritten Signature] Date: 6/13/2017

Taxpayer Telephone Number: [Redacted]

Please send the completed form to:

Ohio Department of Commerce
Attn: MMCP Program
77 S. High Street, 23rd Floor
Columbus, OH 43215



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1L Business in Other Jurisdictions Form

3796:2-1-02(B)(2)(g)

To be Completed by Applicant

Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations:

MIKE ROUMPH

Provide information regarding all other medical marijuana licenses, permits, or registrations ever held, current or expired, by the Applicant in any other U.S. jurisdiction (Attach copies of this form to list any additional entities):

State	Type	Dates of Issue/Expiration	Number

I certify that, to the best of my knowledge, no owner or officer has received any revocation or suspension for any licensure related to the distribution of marijuana.(3796:2-1-02(B)(2)(j)(iii))

I hereby specifically grant permission to the above listed states or jurisdictions and their licensing agency or authority to release to the Ohio Medical Marijuana Control Program any and all information relating to the application, licensure or authorization to produce or otherwise deal in the distribution of marijuana in any form, including the following:

- a. Any denial, suspension, revocation or other significant sanction of the application, license, or authorization, and
- b. A copy of documentation so indicating; or
- c. A statement that the applicant was so licensed or authorized and was never sanctioned. (3796:2-1-02(B)(2)(j)(ii))

Signature: *[Handwritten Signature]*

Date: 6/10/17

Subscribed and sworn to before me this 10th day of June, 20 17.



[Handwritten Signature]
NOTARY PUBLIC



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Cultivator Application – Financial Interest Tax Processing Form

Applicant Name: Pure OH LLC

Applicant Number (if applicable):

Taxpayer Name: Michael W. Roumph

Taxpayer Address:

Taxpayer FEIN/SSN:

The above-named Taxpayer hereby authorize the Ohio Department of Taxation (“Department”) and any of its agents and/or employees to release information to the Department of Commerce. This information shall be limited to information obtained and maintained by the Ohio Department of Taxation and shall not contain any federal tax information as defined in I.R.C. 6103 and received from the Internal Revenue Service. Taxpayer expressly waives the confidentiality provisions of the Ohio Revised Code which would otherwise prohibit disclosure, and agrees to hold the Department harmless with respect to the disclosure herein.

By signing, I certify that, to the best of my knowledge, the documentation provided with Form 1L and/or Form 1N indicates proof of tax compliance for individuals and businesses at the state level for all jurisdictions outside the State of Ohio in which Taxpayer applicant has operated as a business. Acceptable documentation includes tax summary pages or a valid certification indicating tax compliance issued by the appropriate taxation authority. This documentation shall be provided for every person or entity with a financial interest of one percent or greater in the applicant covering the three years before the filing of the application. **Please note that any information provided by the applicant, including tax returns from other jurisdictions, would be considered a “public record” as defined in R.C. 149.43(A)(1).**

If Taxpayer has a financial interest or had a financial interest within the last three years in a medical marijuana entity operating outside the State of Ohio, please list the applicable information below.

Table with 3 columns: Legal Business Name, FEIN, Address. Row 1 contains 'N/A'.

[SEE OTHER SIDE TO COMPLETE FORM]



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

If Taxpayer has a controlling financial interest or had a controlling financial interest within the last three years in a business in an industry unrelated to marijuana, please list the applicable information below.

Legal Business Name	FEIN	Address
N/A		

* If inadequate space is provided on this form, the Taxpayer shall provide the additional information on a separate form that clearly articulates and legibly states the information requested in this form.

I certify under penalties of perjury that I have the authority to legally bind the Taxpayer to this Authorization.

Name and Title of Taxpayer: Michael Roumph, Member

Signature: *[Handwritten Signature]* Date: 6/12/17

Taxpayer Telephone Number: [Redacted]

Please send the completed form to:

Ohio Department of Commerce
Attn: MMCP Program
77 S. High Street, 23rd Floor
Columbus, OH 43215



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1M Copies of Licenses from Business in Other Jurisdictions Cover Page

3796:2-1-02(B)(2)(j)(i)

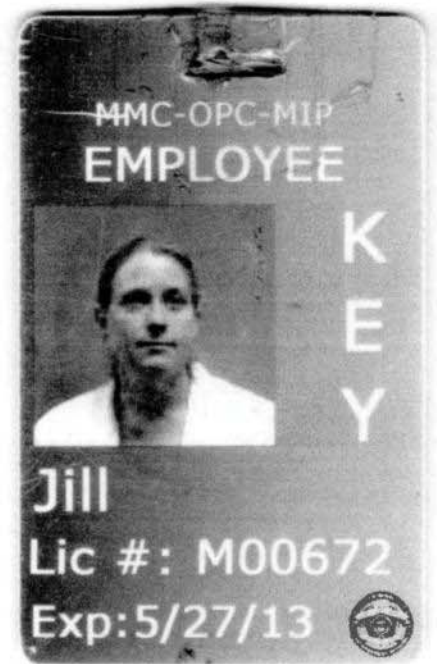
Applicant has licenses from one or more businesses in other jurisdictions. License copies are attached after this cover page.

No license copies are attached.

Mark one of the boxes above.

Include this form in application even if no license copies are attached.

Lamoureux, Jill
Boulder County Caregivers LLC



State of Colorado

State of Illinois
Department of Agriculture
MEDICAL CANNABIS CULTIVATION CENTER OPERATING PERMIT

Permittee: Cresco Labs, LLC
Facility Location:
3625 S. State Route 45/52
Kankakee, IL 60901

Permit #:1503060739
Issued Date: April 3, 2017
Expiration Date: May18, 2018

Original Permit Issued: May 18, 2015

Permittee is hereby authorized to operate a medical cannabis cultivation center as provided in their application and any approved modification and/or alteration at the address above in compliance with the Compassionate Use of Medical Cannabis Pilot Program Act (410 ILCS 130) and associated rules.



Jeff Cox
Illinois Department of Agriculture



State of Illinois
Department of Agriculture
MEDICAL CANNABIS CULTIVATION CENTER OPERATING PERMIT

Permittee: Cresco Labs, LLC

Facility Location:

1432 1800th St.
Lincoln IL 62656

Permit #: 1503060740

Issued Date: February 22, 2017

Expiration Date: March 9, 2018

Original Permit Issued: March 9, 2015

Permittee is hereby authorized to operate a medical cannabis cultivation center as provided in their application and any approved modification and/or alteration at the address above in compliance with the Compassionate Use of Medical Cannabis Pilot Program Act (410 ILCS 130) and associated rules.



Jeff Cox
Illinois Department of Agriculture



State of Illinois
Department of Agriculture
MEDICAL CANNABIS CULTIVATION CENTER OPERATING PERMIT

PERMIT MODIFICATION ADDENDUM #3

Permittee: Cresco Labs, LLC

Facility Location:
3301 Centerpoint Way
Joliet IL 60436

Permit #: 1503060741

Issued Date: March 2, 2017

Expiration Date: March 9, 2018

Original Permit Issued: March 9, 2015

The original permit is hereby modified by the following documents submitted on February 22, 2017.

1. **Schedule 8 – Request to Modify Permit**
2. **Schedule 1**
3. **Schedule 3**
4. **Floor Plan**
5. **USB**

THE STANDARD CONDITIONS OF ISSUANCE ON THE REVERSE SIDE OF THIS PERMIT
MUST BE COMPLIED WITHIN FULL.



Jeff Cox
Bureau of Medicinal Plants



Lamoureux, Jill
Wellness Connection of Nevada LLC

STATE OF NEVADA

MEDICAL MARIJUANA MANAGEMENT

JILL
KATHLEEN LAMOUREAUX

426 SAINT IDA CIRCLE
LAFAYETTE, CO 80026

Sex: M Hgt: 5' 5" Wgt: 170 Eye Color: Blue
ID: 1708005782
DOB: [REDACTED]
Expires: 5/24/2017
DL: [REDACTED]

Est. Type: C167 Cultivation
Est. Name: Wellness Connection of Nevada, LLC
Est. Certificate: 97281433289751297896



STATE OF NEVADA

MEDICAL MARIJUANA MANAGEMENT

JILL
KATHLEEN LAMOUREAUX

426 SAINT IDA CIRCLE
LAFAYETTE, CO 80026

Sex: M Hgt: 5' 5" Wgt: 170 Eye Color: Blue
ID: 1708005785
DOB: [REDACTED]
Expires: 5/24/2017
DL: [REDACTED]

Est. Type: D190 Dispensary
Est. Name: Wellness Connection of Nevada, LLC
Est. Certificate: 80866377749311261143



STATE OF NEVADA

MEDICAL MARIJUANA MANAGEMENT

JILL
KATHLEEN LAMOUREAUX

426 SAINT IDA CIRCLE
LAFAYETTE, CO 80026

Sex: M Hgt: 5' 5" Wgt: 170 Eye Color: Blue
ID: 1708005787
DOB: [REDACTED]
Expires: 5/24/2017
DL: [REDACTED]

Est. Type: P109 Production
Est. Name: Wellness Connection of Nevada, LLC
Est. Certificate: 03109601698817757700



Mission:

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



Rick Scott
Governor

Celeste Philip, MD, MPH
Interim State Surgeon General

Vision: To be the Healthiest State in the Nation

April 4, 2016

San Felasco Nurseries, Inc., d/b/a/ Grandiflora
7315 NW 126th Street
Gainesville, Florida 32653

Re: Low-THC Cannabis Dispensing Organization Application

Dear Applicant:

I am pleased to inform you that San Felasco Nurseries, Inc., d/b/a/ Grandiflora (San Felasco) is approved as a dispensing organization for the Northeast region of Florida, pursuant to chapter 2016-123, § 3, Laws of Florida.

San Felasco has 10 business days to post a \$5 million performance bond in accordance with Rule 64-4.002(5)(e), of the Florida Administrative Code. The original bond, payable to the Florida Department of Health, must be received by the Department no later than 5:00 PM EST on April 18, 2016. If the performance bond is canceled and San Felasco fails to file a new bond with the Department in the required amount on or before the effective date of cancellation, San Felasco's approval shall be revoked.

San Felasco must notify the Department that it is prepared to be inspected and seek authorization to begin cultivation, processing, and dispensing. The following deadlines, as outlined in Rule 64-4.005, of the Florida Administrative Code, apply.

Cultivation

San Felasco has 75 days from this approval to request Cultivation Authorization. No less than 30 calendar days prior to the initial cultivation of cannabis San Felasco shall notify the Department that it is ready to begin cultivation, is in compliance with Section 381.986, F.S., and Chapter 64-4, of the Florida Administrative Code, and is seeking Cultivation Authorization. Failure to meet the deadline to seek Cultivation Authority may result in the revocation of the Department's approval. Please note, no cannabis plant source material may be present in any Dispensing Organization facility prior to Cultivation Authorization.

Processing

No less than 10 calendar days prior to the initial processing of cannabis, San Felasco must notify the Department that it is ready to begin processing, is in compliance with Section 381.986, F.S., and Chapter 64-4, of the Florida Administrative Code, and is seeking Processing Authorization.

Florida Department of Health

Office of Compassionate Use
4052 Bald Cypress Way, Bin A-06 • Tallahassee, FL 32399-1703
PHONE: (850) 245-4444 • FAX (850) 245-4748

www.FloridaHealth.gov
TWITTER: HealthyFLA
FACEBOOK: FLDepartmentofHealth
YOUTUBE: fldoh
FLICKR: HealthyFla
PINTEREST: HealthyFla

Dispensing

San Felasco must begin dispensing derivative product within 210 calendar days of being granted cultivation authorization. No less than 10 calendar days prior to the initial dispensing of derivative product, San Felasco must notify the Department that it is ready to begin dispensing, is in compliance with Section 381.986, F.S., and Chapter 64-4, of the Florida Administrative Code, and is seeking Dispensing Authorization. Failure to meet the deadline to begin dispensing may result in the revocation of the Department's approval.

Finally, submission of an application for Dispensing Organization approval constitutes permission for entry by the Department at any reasonable time, into any Dispensing Organization facility to inspect any portion of the facility; review the records required pursuant to Section 381.986, F.S., or Chapter 64-4, of the Florida Administrative Code; and identify samples of any cannabis or Derivative Product for laboratory analysis, the results of which shall be forwarded to the Department.

Once again, congratulations on receiving approval to become a dispensing organization for the Northeast region. Should you have any questions about this approval, please contact the Florida Department of Health, Office of Compassionate Use.

Sincerely,


^{AL for}
Anna Likos, MD, MPH
Acting Deputy Secretary for Health

CB/cc
cc: Office of the General Counsel

NOTICE OF RIGHTS

This notice is agency action for purposes of section 120.569, Florida Statutes. A party whose substantial interest is affected by this action may petition for an administrative hearing pursuant to sections 120.569 and 120.57, Florida Statutes. A petition must be filed in writing and must be received by the Agency Clerk within twenty-one (21) days from receipt of this notice. The petition may be mailed to the Agency Clerk, Department of Health, 4052 Bald Cypress Way, BIN #A-02, Tallahassee, FL 32399-1703; hand delivered to the Agency Clerk, Department of Health, 2585 Merchants Row Blvd., Prather Building, Suite 110, Tallahassee, FL; or sent by facsimile to (850) 413-8743. Such petition must be filed in conformance with Florida Administrative Code Rules 28-106.201 or 28-106.301, as applicable.

Mediation is not available.

Failure to file a petition within 21 days shall constitute a waiver of the right to a hearing on this agency action.



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1N Tax Payment Records Cover Page

3796:2-1-02(B)(6)(e), 3796:2-1-03(A)(6), 3796:2-1-03(B)(5)(e)

Attach a record of tax payments in the form of tax summary pages or a valid certification indicating tax compliance issued by the appropriate taxation authority for individuals and businesses at the state and federal level and in all jurisdictions in which an applicant has operated as a business for every person with a financial interest of one percent or greater in the applicant for the three years before the filing of the application. **Please note that any information provided by the applicant, including tax returns from other jurisdictions, would be considered a “public record” as defined in R.C. 149.43(A)(1).**

Include this cover page.




Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

10 Disadvantaged Group Applicant Form

3796:2-1-03(C)(1)(a), 3796:2-1-03(C)(4)(a)(i), 3796:2-1-03(C)(4)(b)

To be Completed by Applicant	
Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations:	
Pure OH LLC	
Indicate which (if any) of the following additional criteria apply:	
<input checked="" type="checkbox"/> I certify that the principal place of business and headquarters of this organization is Ohio. (3796:2-1-03(C)(1)(a))	
<input type="checkbox"/> I certify that the applicant’s business is owned and controlled by a U.S. citizen who is a resident of Ohio and is a member of one of the economically disadvantaged groups set forth in division (C) of section 3796.09 of the Revised Code. For purposes of this section, “owned and controlled” means that at least fifty-one percent of the business, including corporate stock in a corporation, is owned by persons who belong to one or more of the groups set forth in the rule, and that those owners have control over the management and day-to-day operations of the business and an interest in the capital, assets, and profits and losses of the business proportionate to their percentage of ownership. (3796:2-1-03(C)(4)(a))*	
<input type="checkbox"/> I certify that the applicant’s business is owned and controlled as a woman-owned business by a U.S. citizen who is a resident of Ohio. principal place of business and headquarters of this organization is Ohio. For purposes of this section, “owned and controlled” means that at least fifty-one percent of the business, including corporate stock in a corporation, is owned by persons who belong to one or more of the groups set forth in the rule, and that those owners have control over the management and day-to-day operations of the business and an interest in the capital, assets, and profits and losses of the business proportionate to their percentage of ownership. (3796:2-1-03(C)(4)(b))	
Note: Additional criteria, as described in 3796:2-1-03, may be submitted in Section 2 of the Ohio Cultivator Application Filing Packet. See MMCP-C-1001B,	
Signature: 	Date: 06/14/2017

* The members of the economically disadvantaged groups must be identified in Form 11 along with their percentage of ownership.



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1P Entity Identifier Legend Form

In addition to Form 1I Owners and Officers Roster Form for individuals, entries in the Entity Identifier Legend must be used in place of an entity’s name for any entity that is referenced in Section 2 of the application.

Identifier Legend	Entity Name
<i>Example: Entity A</i>	<i>ACME Construction</i>
<i>Example: Entity B</i>	<i>Capital Investors, LLC</i>
Applicant	Pure OH LLC
The Company	Pure OH LLC
Security Firm	Vector Security
General Counsel	Dinsmore
Special Counsel	Blackwell Hirsch
CPA	To be selected
QA/QC Consultant	Jahan Marcu PhD
Cannabis Chemistry Consultant	Kyle Boylar PhD
Genomics & Breeding Consultant	Front Range Biosciences
Molecular Bio & Pharmacology Consultant	Tal Nuriel PhD
GMP Consultant	Miran Consulting
Greenhouse Technology Consultant	Hothouse Consulting
Regional Agriculture Expert	Sutherin Greehouse
Energy and Sustainability Consultant	WindStax
Greenhouse Design/Build Firm	Rough Brothers Inc.
3rd Party Certifier (Pesticide Free)	Clean Green Certified
3rd Party Certifier (Patient Focus)	Patient Focused Certification by Americans for Safe Access



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

1Q Trade Secret and Infrastructure Record Notification Form

The undersigned is an Applicant for a medical marijuana cultivator license. The Applicant understands that the Department of Commerce is an entity of the State of Ohio and any documents or data submitted to the State of Ohio may be disclosed by the State pursuant to an Ohio Public Records Act request.

While the Ohio Public Records Act permits certain exclusions from disclosure, Applicant understands the State makes no guarantee or promises that such data will not be disclosed. Applicant has reviewed the Ohio Public Records Act, as well as relevant case law.

Applicant understands that the documents or data it provides to the State of Ohio may not be confidential, or if confidential, may or may not be disclosed pursuant to an Ohio Public Records Act request.

Applicant understands that there are additional requirements in order to claim a trade secret or infrastructure record exception. Applicant understands that materials consisting of trade secrets or infrastructure records must be clearly marked, specifying the pages of the application submission that are to be restricted and justifying the trade secret designation or infrastructure designation for each item.

Signature of Person or Authorized Representative

Date

06/14/2017

Printed Name of Applicant

Pure OH LLC by Jill K Lamoureux, CEO



Medical Marijuana Control Program (MMCP)

Cultivator Application – Filing Packet Section 2: Non-Identifiers

Instructions are provided in a separate document: Cultivator Application – Request for Applications / Instructions Packet (MMCP-C-1000).

Cultivator Application – Filing Packet Section 2 Non-Identifiable Information Checklist

Please note: All of the following must be submitted in a non-identified format.

To be Completed by Applicant	
<input checked="" type="checkbox"/>	I hereby acknowledge and understand that if I include identifiable information in this section (Section 2) of the application, the identifiable information will be redacted and two points will be deducted from the applicant’s total raw score for every instance that identifiable information is used and redacted in this section, not to exceed five instances that require redaction. I also acknowledge and understand that if more than five pieces of identifiable information need redacted from Section 2 of the application, the application will be denied.

Section	Description	Completed (✓)
Section 2: Non-Identifiable Information Section		
2A	Business Plan	X
	Experience in Business	X
	Business Model	X
2B	Operations Plan	X
	Experience in Agriculture / Cultivation	X
	Cultivation Methods and Proposed Strains	X
	Product Time and Production Schedule	X
	Marijuana Cultivation Area Layout and Environment	X
	Standard Operating Procedures	X
	Staffing and Training	X
2C	Quality Assurance Plan	X
	Packaging and Labeling	X
	Production Control	X
	Inventory Control	X
	Disposal and Waste Removal	X
	Adverse Events and Recall Procedures	X
	Record Keeping and Regulatory Compliance	X



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

2D	Security Plan	X
	Surveillance Technology and Physical Security	X
	Transportation	X
	Facility Plot Plan and Specifications	X
	Emergency Notification Procedures	X
2E	Financial Plan	X
	Funding Analyses	X
	Operating Expense Breakdown	X



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

2A Business Plan
(Maximum of 15 pages, see instructions for formatting)

Please note: The following must be submitted in a non-identified format.
Include this form as a cover page.

Applicant should provide a narrative detailing support for the following:

Part I: Experience in Business

Experience, which includes generic, non-specific information on business licenses held by any person affiliated with the applicant. (3796:2-1-03(B)(1)(c))

Part II: Business Model

(A) A proposed business model demonstrating a likelihood of success, a sufficient business ability, and experience on the part of the applicant. (3796:2-1-03(B)(1)(a))

(B) (OPTIONAL) If applicant is seeking additional scoring considerations on an Ohio Based Jobs and economic development plan, the applicant may also provide a plan for generating Ohio-based jobs and economic development. (3796:2-1-03(C)(1)(b))

2A BUSINESS PLAN

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PART I: EXPERIENCE IN BUSINESS

INTRODUCTION

The Applicant is a newly formed Ohio entity (the “Company”) created to operate a Level II medical marijuana cultivation operation, if we are granted the opportunity. However, the principals of the Company are long-time partners and friends and our model is the culmination of years of industry pioneering experience. The project is the vision of our founder and CEO. A native of the Buckeye State, she has spent the last nine years as an entrepreneur and consultant in the regulated medical marijuana industry. She established one of the first, and most respected, multi-location medical marijuana businesses in the country after finding the sources of medical marijuana available at the time for her husband, a qualifying patient, to be unacceptable - unsourced, untested, and often contaminated with molds, mildews and pesticides.

As a former financial administrator for a quasi-governmental entity, she was asked to serve on the workgroup that created the first set of state rules adopted for a regulated medical marijuana system and later was a subject matter expert for the consultant that crafted the first set of state regulations for adult-use cannabis and established the medical marijuana system framework for a U.S. territory in the Caribbean. After selling the business in 2012, she consulted for several government and private entities primarily focusing on rulemaking, licensing, and start-up operations. She was a founding member and later nominated as the second chairperson of the first national trade association for cannabis businesses and continues to be active in policy and industry development. She continues to serve on multiple boards for medical marijuana organizations focused on industry standards.

After years of crafting an expansive industry network and working with several quality employees, business operators, and investors, in June of 2016, she brought together a team of trusted employees and investors as owner/operators to form a new company that they own and control. The Company’s driving ambition is to apply the many lessons learned from years of operational and consulting experience to a build business that we know will be viable, ethical, and sustainable.

PRINCIPAL OFFICERS - EXPERIENCE & QUALIFICATIONS

Chief Executive Officer (CEO), Owner and Principal Officer

A leader in the cannabis industry since 2008, our CEO owned and operated four dispensaries, three cultivation facilities, and one commercial kitchen until 2012. As the founder of one of the first patient and caregiver cooperatives under a state constitutional amendment, she became heavily involved in the transition to the first state regulated medical marijuana system. In 2010, she served on medical marijuana work groups for the two regulatory agencies where she played an active role in drafting the nation’s first compilation of state regulations for physicians, patients, caregivers and businesses. As a patient advocate and business owner, she was the only non-government representative to serve on both committees. She has served on numerous boards and contributed to the development of regulations, industry standards and certification programs with several organizations. She continues to provide subject matter expertise to public and private clients worldwide.

Our CEO previously worked in state government and toll road administration, giving her an understanding of the regulatory process and experience operating in a highly-regulated environment. Her government background combined with a deep compassion for chronically ill patients led her to build one of the most respected operations in the country. While she has spent much of her career in regulatory policy and quality standards, she is an operator at heart with a mission to improve the quality of life of patients. She believes providing patient access in a safe and educational manner is the primary function of a successful state program and the responsibility of all medical marijuana business owners. She is a mentor with a seed-stage business accelerator program and venture fund for the cannabis industry, where she voluntarily assists start-ups in the space, consistently advising that they stay focused on patients and only raise capital from investors aligned with their mission.

Most recently our CEO spearheaded the start-up operations for a licensee in the Caribbean. Despite the project's many capital and logistical problems, the first harvest was delivered within six months of award. The client is the only producer of certified pesticide-free medical marijuana in the territory. She developed the company's SOPs, managed supply delivery and logistics to the island and oversaw the implementation by hiring and training an all-local workforce without any prior cannabis experience.

Chief Financial Officer (CFO), Owner and Principal Officer

The Company's CFO is an accomplished entrepreneur, active angel investor, and passionate about building businesses. His experience ranges from recruiting founding teams, fundraising and leading M&A transactions to listing on the New York Stock Exchange. In addition to being our CFO, he is on the Board of Directors of the only venture backed human resource and payroll processing platform for the cannabis industry. Previously, he founded an automotive software company, and, prior to that, co-founded an industry-leading mobile software company. His earlier experience included management consulting at a top tier consulting firm and investment banking at a national retail and commercial banking enterprise.

As an investor, board member or advisor, he has been involved with dozens of technology companies. In addition to his operational and investing efforts, he is a mentor with a seed-stage business accelerator program and venture fund for the cannabis industry where he met our CEO, also a mentor. Prior to that, he was a mentor with the nation's leading technology incubator. He is an active speaker and writer on the topics of angel capital investing and entrepreneurship. He holds an undergraduate degree in Finance, Business Administration, and a Master of Business Administration degree from leading business programs on the East Coast.

Chief Operating Officer (COO), Owner and Principal Officer

Our COO will oversee operations and coordinate directly with locally hired department managers to ensure compliant, efficient, and effective operations. She brings eight years of operational experience from licensed cultivation, manufacturing, and dispensary facilities in multiple states. She began her career working in our CEO's operations. She quickly became an integral part of the organization's growth and development managing three retail facilities and training employees in cultivation and manufacturing roles as well.

Early in her career she helped to create a model for medical marijuana businesses across the country where a leading national cannabis reviewer said they were "as impressed by the professional atmosphere and friendly nature of the staff as I was by the ...wide selection of [products] with a huge dose of patient education and wellness services." While building the business, our CEO and COO also invested a great deal of time and energy into the development of the new medical marijuana industry. As founding

members of several national organizations, they have advocated for responsible operations, quality standards, and diversity in leadership positions for the past seven years.

Our COO has trained staff members at licensed facilities across the United States, including Colorado, Nevada, Illinois, Hawaii, and Florida in each discipline including cultivation, processing, manufacturing, distribution, and dispensing. Her objective is to create a safe environment using policy and procedures built to ensure full compliance and model current best practices. She will oversee a successful recruiting and training program and the implementation and maintenance of operating protocols throughout all aspects of our operations.

QA/QC Director, Owner and Principal Officer

After graduating from college in 1998, our Quality Assurance/Quality Control (QA/QC) Director founded and operated a high-grossing employment agency in the Midwest. He grew the company to over thirty internal employees and helped employ thousands of other people before selling the company in 2007. In 2008, his passion for pharmaceutical alternatives, drove him to develop and operate a large nutraceuticals company. He grew this company to over 150 product SKUs, which are sold all over the country. He is still the current owner and operator.

Our QA/QC Director's experience formulating pharmaceutical alternatives, complying with Federal Drug Administration (FDA) current Good Manufacturing Practice (GMP) standards, and his background with FDA dietary supplement requirements are critical to the Company's day to day activities. While the medical marijuana industry is not currently under the FDA's purview, adhering to GMP standards protects patients, reduces our product liability risk, and prepares us for future oversight. Additionally, QA/QC Director is well versed in medical marijuana with experience as an owner in one the few licensed operations in the southern United States.

IT Director, Owner and Principal Officer

The Company's IT Director is a successful serial entrepreneur with multiple exits over a fifteen years to companies including large, listed companies. He was recently recognized as a top executive of 2017 award recipient, ranking #26 in the United States and #12 in Technology out of more than 167,000 public and private companies. He was also named one of the Top 40 Entrepreneurs in America in a Top Ten university ranking. He has been a founder, executive, angel investor and fund manager throughout his career in the private sector after serving in the United States Army as an Airborne, Air Assault and Ranger Qualified Captain in the Corps of Engineers.

Previously, he was President of Alternative Investments and Managing Director for two large capital management firms. In the past, he was a co-founder and director of a next-generation advanced services provider focused on wholesale communications services for carriers and service providers, which was acquired in July 2003 by a multi-national communications firm. As a mobile and multiscreen industry expert, our IT Director is frequently quoted in trade publications, serves as a panelist at industry events and writes for a nationally distributed business newspaper. He holds an MBA, MSIE and BSIE degrees and serves on the President's Council of his alma mater.

Brand Manager, Owner and Principal Officer

Our Brand Manager brings over a decade of communications experience to the Company. Her background in building educational platforms for complex projects and technologies allows her to expertly craft our messaging to processors, dispensaries, patients and physicians explaining our calcium-based, "true living organic," and pesticide free cultivation methods. She is a strategic thinker, creative

collaborator and passionate marketing expert with experience leading high powered teams globally. She brings a variety of skill sets from multiple industries including multi-channel sales leadership, large organization management, healthcare technology including cloud based Electronic Medical Records (EMR) & Point of Care (PoC) solutions, and five years of global work experience, living and working abroad.

Certified in Six Sigma & LEAN, a management philosophy in process improvement, our Brand Manager will also spearhead the Company's internal lean operating efforts. Her success in management of EMR and PoC solutions also makes her ideally suited to implement our adverse event reporting systems. She brings years of team building experience where she successfully recruited, trained, deployed large high performing teams for projects with territory and time constraints. This expertise will ensure that our internal team's communications are as effective and focused as our external communication.

FEE-BASED CONSULTANTS

Our experience in multiple medical marijuana operations has focused our strategy and model. As a Level II applicant, we understand that the smaller footprint brings both advantages and disadvantages. While we have built several advisory boards for our clients applying in new medical marijuana states, we rarely see them properly implemented or successfully utilized. The Company's philosophy on advisors is that they should be fee-based experts paid for their services as needed. Our years of experience in the medical marijuana industry has allowed us to build a portfolio of trusted experts who provide services where a full-time employee is unnecessary or cost prohibitive. The following is a list of expert independent consultants and firms we work with regularly and have engaged or plan to engage for this project if awarded.

Independent Security Firm

Our Security Firm is one of the largest electronic security companies in the U.S., headquartered in the Midwest. The firm has long standing relationships with developers, contractors and engineers. The Company has worked with them on multiple projects and found their team has a thorough understanding of building construction and how security products apply to large projects and operations. The Security Firm is also certified to design life safety/fire applications to meet and exceed NFPA-72 and local code requirements. The company's areas of expertise include physical security, access control and CCTV to protect structures and occupants from catastrophic events. The firm assists in the development of corporate security planning and training of managers. Additionally, the firm has extensive experience with air sampling with regards to dangerous gases used in facilities. The Security Firm is certified in several applications including common products used by government and the private sector.

General Counsel

With over 650 attorneys in 21 cities throughout the United States, our General Counsel has the resources, experience, and knowledge to help the Company operate as owner/operators and consultants in multiple regulated jurisdictions. Our legal needs touch nearly every facet of the law - from corporate structure to emerging technologies, from intellectual property to product liability, from regulatory oversight to labor and employment. As one of the Midwest region's largest law firms, our General Counsel provides the Company with a comprehensive menu of professional services.

Special Counsel

Our Special Counsel focuses on our medical marijuana specific legal needs. The firm has offices across the country, but their medical marijuana practice has mainly operated out of Denver since 2009. The firm has helped the Company navigate the complex and ever-changing regulations governing the state legal sale and use of cannabis. The firm represents a number of clients in the cannabis industry including medical and retail centers, medical and retail cultivations, manufacturers of infused products, testing facilities, marijuana technology companies, industrial hemp farms and processors, landlords, private equity funds, credit unions and security companies.

Independent Certified Public Accountant

The Company has not yet selected a CPA firm licensed in Ohio. We have interviewed several firms and will sign a letter of engagement if we are granted a provisional license by the MMCP.

Independent QA/QC Consultant

Our CEO has worked with our independent Quality Assurance/Quality Control consultant on a variety of projects and teams beginning in 2012 when they both worked with a national non-profit to develop an international cannabis standards certification program. They both continue to serve as auditors and on the audit committee board. He is a highly recognized and respected international expert in the field of medical cannabis science. The Company has engaged him on several projects to audit operations and make process improvement recommendations and expects to engage him in Ohio if awarded.

He earned his Ph.D. in cell biology from a Midwest university known for its science and medical programs. His first major research project in cannabis science was an investigation of the CB1 Receptor. He organizes a series of educational seminars and conferences on medical cannabis, cannabinoids, and endocannabinoids each year, is a contributing author on medical research materials, and provides fundraising efforts and volunteer work focused on HIV/AIDS and other terminally ill patients. He frequently publishes critical reviews and other regulatory documents regarding cannabis and cannabinoids and works with regulators on implementing product safety standards for medical cannabis products.

In the private sector, he has focused on medical cannabis research and herbal supplement regulation, advising, and consulting. He provides method development and validation of quantitative analysis (contamination, potency, and genetics) for medicinal plants. His research is presently focused on studying disease markers of the endocannabinoid in collaboration with two universities. He has built a vast international network of scientific and technical experts in the cannabis field as a Scientific Board Member and co-founder of several committees and working groups. As an independent consultant, he advised on the development of our new product offerings and technology initiatives leveraging our capacity as a small, private company to fund new projects.

Independent Cannabis Chemistry Consultant

While the Company primarily uses his services on our manufacturing (processing) projects, our Independent Cannabis Chemistry Consultant has provided the Company insight on the syntheses of cannabinoids in the cannabis plant. He works with our CEO and COO advising on cultivation techniques to enhance the development of specific cannabinoids in the growth cycle. Utilizing breeding and chemical synthase techniques to enhance production in growth allows for a lower cost medicine to patients and increases the variety of cannabinoid ratios available in products. He has spent his entire

career in cannabis science since earning his degree in chemistry in 2012 as the lab manager for an independent cannabis testing lab and as an independent consultant.

Independent Genomics and Breeding Consultant

The Company's Genomics and Breeding Consultant brings the best of modern agriculture to high value crops to improve reliability, efficiency, and safety for cultivators and consumers. They help operators employ scientific tools already proven successful in other agricultural sectors such as micropropagation and marker assisted breeding. Our CEO and CFO were introduced to the company through the seed stage cannabis incubator program where they are mentors. The new consulting firm is founded by several experts in plant science with extensive cannabis experience. The Company will engage the firm immediately for genomics and breeding advice to produce new varieties with disease resistance, better agronomic traits, and unique chemical profiles. The firm will also be engaged to provide final design and implementation services for our planned micropropagation laboratory expansion.

Independent Molecular Biology and Pharmacology Consultant

One of the Company's major areas of interest is the breeding of cannabis strains specifically designed to treat certain disease states and symptoms. We work with our Cannabis Chemistry and Genomics and Breeding Consultants to produce scientific methods and operational protocols to do so. However, we also seek advice as to what plant traits to enhance. Our independent Molecular Biology and Pharmacology Consultant provides insights on the latest research available to guide our breeding projects and works with our other consultants to help develop our projects and goals. He holds a PhD in Pharmacology from a well-respected school of medicine and is now an active post-doctoral research fellow at an ivy league university with research primarily focused in two areas:

- Alzheimer's disease: Primary scientific interests revolve around the study of Alzheimer's disease, as well as other neurodegenerative illnesses. Goals include the discovery of novel mechanisms and treatments for age-related neurodegenerative diseases such as Alzheimer's disease, Parkinson's disease, Huntington's disease and ALS.
- Multi-omic Analysis: Possesses a specific interest in the use of omics technologies such as metabolomics and RNA-sequencing, which allow for a more comprehensive understanding of the underlying mechanisms responsible for disease pathogenesis and offer distinct advantages for discovering effective new therapeutic strategies.

Our Molecular Biology and Pharmacology Consultant will primarily be engaged to advise our manufacturing activities and product development if we are awarded a processing license; however, his insight into targeted compounds helps guide our breeding program. While we understand these type of breeding programs are long-term projects and an area of research that will be dominated by large firms, we are nonetheless passionately interested in these research pursuits.

Independent GMP Consultant

Our independent GMP consultant brings decades of FDA drug experience to the medical marijuana industry. After battling chronic leukemia for a decade, she had exhausted all her options from approved drugs to clinical trials. As a scientist and drug development expert with decades of FDA drug approval consulting experience, she hesitated to try medical marijuana but had exhausted all of the traditional avenues available. When she discovered how effective it was she became an ardent advocate and recently served on a state's commission helping draft the regulations with a focus on safety and quality

standards. Our CEO developed a close working relationship with our Consultant during the drafting of these regulations due to their shared commitment to and advocacy for industry quality standards. She developed the Company's phased GMP plan and will assist in its implementation providing independent oversight and consulting services if awarded.

Independent Greenhouse Technology Consultant

The Company's independent greenhouse technology consultant is a fourteen-year-old firm that provides greenhouse consulting for traditional markets across North America and created a division focusing in the cannabis space. The firm's principals have decades of experience in Commercial Hydroponic High Tech Vegetable Greenhouse, Commercial Organic High Tech Greenhouse and Commercial Cannabis High Tech Greenhouse operations. They have a vast network of professionals and clients across the spectrum of greenhouse operations including several Ohio businesses. Our CEO has worked with the firm on several applications and they are a trusted advisor. If awarded in Ohio, the Company will immediately retain the firm to help recruit a local greenhouse professional the Company can train as our cultivation manager. The firm will also act as our owner's representative for our greenhouse construction project. Additionally, they will help us troubleshoot any start-up issues with our environmental controls, automated feeding systems, and other greenhouse technologies.

Independent Regional Agriculture Consultant

The Company's CEO and COO have helped start cultivation operations through the United States including island locations. Each facility operates in its own microclimate and presents unique start-up challenges. Because these problems are local we engage a regional expert in each jurisdiction we operate. In Ohio, we have recruited and will engage with a local expert greenhouse operator recommended by the municipality where our proposed location is situated. If awarded, the Company will utilize his local expertise to address regional climate issues and source recycled farm materials and reliable local sources for nutrient and soil components and consumables. Additionally, he will utilize his knowledge of the local climate and air flows to help us design and implement an effective and cost effective odor management plan utilizing environmental solutions and operational practices prior to employing mechanical or chemical means.

Independent Energy and Sustainability Consultant

Our Energy and Sustainability Consultant is a Midwest firm specializing in wind power. Our facility design incorporates the generators in our plans. The firm manufactures and installs unique wind turbines and micro grids based on their patented designs. The firm's Principals are known experts in renewable energy and provide the Company with advice beyond their products. The firm's founder is the former executive director of a university-based technology institute and is currently the inaugural executive director of a leading-edge technology cooperative resolved to establish their city as the leader in advancing social, educational, and economic development agendas through innovative use of technology. He has helped launch several companies in varied industries ranging from energy to consumer products.

PART II: BUSINESS MODEL

PART A - PROPOSED BUSINESS MODEL

Introduction

Participating in the development of new businesses and markets over the past eight years across the country has provided our team with rare expertise in the medical marijuana industry. Prior to starting our new venture last year, our Principal Officers have assisted multiple ownership groups across the country in securing merit-based medical marijuana licenses by providing application and implementation services as independent consultants. However, at times, we watched many of those groups struggle to build successful and sustainable businesses, despite the quality of their founding teams. Medical marijuana operations are uniquely difficult and few ownership groups are truly prepared to handle the series of challenges they will face.

Ohio's unique system providing accessibility to the medical marijuana for small business is the ideal situation for the Company's business model. We have witnessed the difficulty operators have in adequately capitalizing their businesses. A Level I operation will be required to successfully raise and manage tens of millions of dollars. Further, because the medical marijuana industry is still a risky investment given the federal restrictions, the cost of that capital, if available, will be prohibitively high.

In our business model, as a Level II applicant, our team can fully fund the operation internally giving us much more direct ownership and operating flexibility vs. a Level II entity, which will rely on such an incredible amount of equity and debt financing. The opportunity truly allows us to build the business we have envisioned for years providing affordable, hand-crafted and certified pesticide-free plant medicine in an environmentally and financially responsible business model.

Guiding Principals

As a self-funded operation, we are able to develop our business model focused on shared values rather than on investors' desired returns. Our Company is founded on the following principals, which guide strategic decision making and our operating policies and procedures.

- Provide a craft, high quality product at a reasonable price
- Focus on product safety throughout the entire production process
- Utilize existing science and agriculture technology to reduce costs
- Regularly engage with experts for process improvement
- Operate a lean, efficient start-up while remaining compliant with all laws and regulations
- Hire and train local staff with priority to the long-term unemployed and displaced workers
- Utilize local product and service providers whenever possible
- Support patients and the emerging industry in our actions, not our marketing

Summary Business Model

Each one of our Principals has founded or participated in start-up businesses. Additionally, our CEO and CFO are mentors for a cannabis seed stage incubator and venture fund, where they met. A commonly used tool for new start-ups is a "lean canvas" or summary business model focusing on core elements. The Company's business model was developed from the following summary.

Team and Funding Composition

Our Company is 100% owner operated and financed and features a robust team of experts from multiple disciplines. Every element of the Company's business model was carefully crafted starting with the corporate structure. The formation and financing of any company is critical to its ongoing success, and that is especially true for medical marijuana companies. Our operating agreement addresses standard corporate formation issues, but also dictates procedures for situations unique to medical marijuana companies including the dissolution of members who fail to stay compliant with legislative or regulatory ownership requirements and the process for additional capital calls needed for capital improvements and expansion.

The in-depth experience with the complex needs of medical marijuana start-ups possessed by our CEO and COO guided the selection of partners for the Company. They sought out partners with specific skill sets to bring needed expertise that is not specific to medical marijuana operations. Potential partners that were not committed to the vision, or that could not understand the intricacies of the medical marijuana sector were passed over. As a result, the Company's founders all possess value-added skills, including:

- Industry pioneers with expansive professional networks in the medical marijuana space and a personal commitment to safe products for patients and the establishment of a quality medical marijuana systems throughout the country;
- Entrepreneurs who have actively participated in several start-up operations in multiple jurisdictions;
- Healthcare and information technology professionals who can contribute to our knowledge base and lend expertise to our operations, research, and product development initiatives; and
- Seasoned angel investors who already have deployed capital in the medical marijuana sector.

Conservative Capital Management

Our Principal Officers bring extensive start-up experience and proven ability to manage the everyday challenges of a new medical marijuana business. The Company is well capitalized and has committed funds available that far exceed our projected capital requirements. However, based on our experience in new markets, we have reserved a significant amount of working capital in the budget to withstand possible delays to the implementation of the program or our construction timeline, slow patient adoption rates, and any other unforeseen occurrence that could disrupt earnings and cash flow. Because we are sensitive to cash flow concerns during early operations, we structured our financial plan so that capital deployment is triggered by key performance indicators either internal to the company or external and indicative of a successful, growing medical marijuana market. Our reinvestment of funds grows in relation to revenues. Our financial plan is described more fully in Section 2E.

Lean Operations

Our Principal Officers bring extensive start-up experience from multiple industries including medical marijuana. Our Brand Manager also possesses Six Sigma and LEAN certifications. We employ an efficient operating model that has been successfully deployed in several operations. Our owners will operate the business and manage day to day tasks. Local hires with strong transferable skills will be trained by our CEO and COO utilizing proven SOPs and on-the job training methods that have been developed from years of operating and consulting experience. Level 1 key managers will be cross trained to manage all functions from propagation to transportation. While our Principal Officers are designated in particular roles, our team is extremely capable and versatile and will cross department

lines frequently to ensure the most qualified individual is assigned to each function and project. We employ fee-based consultants rather than full-time or equity compensated employees or advisors. This reduces our salary burden and ensures that projects are successfully completed by compensated professionals in a timely manner.

Maintain and Grow Strong Networks

The Company's business model leverages our Principals Officers' extensive, long-term industry networks and solid professional reputations to form strategic partnerships with multiple types of stakeholders from suppliers and professional service providers to other licensees in the jurisdictions where we operate. These relationships allow us to quickly identify and access quality goods and professional services available to the medical marijuana industry. The Company also develops extensive community outreach programs in every market we serve primarily focused on local economic development and community based agriculture programs where our skills are best utilized. These programs and outreach initiatives are one of our most effective tools for employee retention and for meeting prospective employees and local contractors and vendors.

Affordable, Clean, High Quality Medicine

As patient advocates and medical marijuana operators, we understand a cultivation licensee will serve two types of clients – other licensees and the end user. In essence, our business model is to provide a uniquely clean and quality product with excellent and knowledgeable service at an affordable price. For other licensees, this means delivering quality product on-time, every time and making it right if we don't. We work closely our wholesale customers sharing our operational expertise to help their businesses succeed.

For the end user and their physician, we believe in growing plant medicine naturally without the use of synthetics or pesticides in a sustainable manner. We believe that a significant number of physicians and patients will seek out products developed to these standards. These beliefs are core to our business model and are beginning to be proven out in sales data from existing medical marijuana markets. Our CEO and COO have together spent over sixteen years developing standard operating processes for cultivation of third-party certified pesticide-free medical marijuana in an affordable manner. They have successfully transferred this knowledge to employees in new operations across the country. The SOPs have also earned third-party certification for patient focused operators and have been approved by regulators in multiple jurisdictions.

PART B - JOBS & ECONOMIC DEVELOPMENT

As a small business, if the Company is awarded a Level II cultivation license, one of the most effective economic development tools we can deploy is providing quality employment opportunities in our host community. Our Principal Officers have founded and operated a number of small businesses and one of our core shared values as entrepreneurs is creating opportunities for our employees as individuals as well as the company. Our CEO and COO have successfully hired and trained several dozens of employees for numerous medical marijuana operations. Our model is to hire local residents without medical marijuana experience, but with transferable skills like manufacturing or landscaping.

The Company will hire six to eight employees in both staff and management roles in the first year of operation, doubling the roster when the MMCP allows for expansion. Hiring priority is given to long-

term unemployed residents and displaced manufacturing workers in our host community. The Company will utilize the recruitment services provided by the Ohio Means Jobs program to seek out local candidates. After a 90-day review period, the Company offers wages beginning at \$15.00 for our staff employees as well as a standard benefit package including tuition and medical reimbursement programs and a company-administered Section 125 plans for healthcare and childcare expenses. Managers starting salaries begin at \$40,000 annually.

While medical marijuana start-ups face a lack of access to traditional financing options and typically don't maintain large reserves, they are often rich with human capital. Our team features several talented professionals who can share a wealth of knowledge and experience with the community. Our founders believe that skills-based volunteerism is one of the most effective ways to contribute to the economic development of the communities where we operate. Our employee benefits package includes an Employee Volunteer Program managed by our COO. Manager level employees are provided with 16 paid hours per quarter to volunteer with a community non-profit and entry-level employees are provided 8 hours per quarter until one year of service is reached and the benefit is doubled. The EVP program provides fosters a feeling of corporate and community pride in our employees and allows them to contribute to their own community's economic development by lending their skills to their preferred local non-profits.



Medical Marijuana Control Program (MMCP)

2B Operations Plan
(Maximum of 30 pages, see instructions for formatting)

Please note: The following must be submitted in a non-identified format.
Include this form as a cover page.

Applicant should provide a narrative detailing support for the following:

Part I: Experience in Agriculture / Cultivation

Demonstrating experience with the cultivation of medical marijuana or agricultural or horticultural products, operation of an agriculturally related business, or operation of a horticultural business. (3796:2-1-02(B)(3)(b), 3796:2-1-03(B)(2)(b))

Part II: Cultivation Methods and Proposed Strains

(A) Agricultural cultivation techniques / Documentation of cultivation methods and standards that will provide a steady, uninterrupted supply of medical marijuana. (3796:2-1-02(B)(3)(a), 3796:2-1-03(B)(2)(a))

(B) A list of medical marijuana varieties proposed to be grown with estimated cannabinoid profiles, if known, including varieties with high cannabidiol content. (3796:2-1-02(B)(3)(c), 3796:2-1-03(B)(2)(c))

(C) (OPTIONAL) If applicant is seeking additional scoring considerations on a research plan, the applicant may provide the department with a detailed proposal to conduct or facilitate a scientific study or studies related to the medicinal use of marijuana. (3796:2-1-03(C)(5))

Part III: Product Timeline and Production Schedule

Indicate the estimated timeline and production schedule. Describe how all raw materials will proceed from the assignment of a plant identifier to the shipment to a dispensary as dried product or to the processor for production of a processed product. Please indicate the estimated time elapsed for each area of production and/or each process involved at that particular stage of production.

Part IV: Marijuana Cultivation Area Layout and Environment

Facility specifications, including the cultivation environment, layout of the marijuana cultivation area (i.e. grow tables, tiered or stacked orientation, etc.) evidencing that the applicant will comply with the requirements of Chapter 3796 of the Revised Code and will operate in



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

accordance with the rules promulgated pursuant to Chapter 3796 of the Revised Code. (3796:2-1-02(B)(3)(d), 3796:2-1-03(B)(2)(d))

Part V: Standard Operating Procedures

(A) The implementation of standards and guidelines for cultivating, propagating, vegetating, flowering, and harvesting medical marijuana, including safety protocols and equipment. (3796:2-1-02(B)(3)(e))

(B) (OPTIONAL) If applicant is seeking additional scoring considerations for submitting an environmental plan, the applicant may demonstrate an environmental plan of action to minimize the carbon footprint, energy usage, environmental impact, and resource needs for the production of medical marijuana. (3796:2-1-03(C)(2)(a))

(C) (OPTIONAL) If applicant is seeking additional scoring considerations for submitting an environmental plan, the applicant may describe any plans for the construction or use of a greenhouse cultivation facility, energy efficient lighting, use of alternative energy, the treatment of waste water and runoff, and scrubbing or treatment of exchanged air. (3796:2-1-03(C)(2)(b))

Part VI: Staffing and Training

(A) Staffing and training guidelines/ Facility staffing and employment matters, including employee training and employee compliance with Chapter 3796 of the Revised Code and in accordance with the rules promulgated pursuant to Chapter 3796 of the Revised Code. (3796:2-1-03(B)(2)(e), 3796:2-1-02(B)(3)(f))

(B) (OPTIONAL) If applicant is seeking additional scoring considerations on employment practices, the applicant may demonstrate a plan of action to inform, hire, and educate minorities, women, veterans, disabled persons, and Ohio residents. (3796:2-1-03(C)(3))

2B OPERATIONS PLAN

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PART I: EXPERIENCE IN AGRICULTURAL/CULTIVATION

INTRODUCTION

The Applicant is a newly formed Ohio entity (the “Company”) created to operate a Level II medical marijuana cultivation operation, if we are granted the opportunity. However, the principals of the Company are long-time partners and friends and our model is the culmination of years of industry pioneering experience. The project is the vision of our founder and CEO. She established one of the first and most respected, multi-location medical marijuana businesses in the country beginning in 2008 after finding the sources of medical marijuana available at the time for her husband, a qualifying patient, to be unacceptable - unsourced, untested and often contaminated with molds, mildews and pesticides. She began to reach out to other patients and cultivators (caregivers) who grew without toxic chemical additives and began to connect them with each other and physicians and patients seeking “clean” medical marijuana. Upon the passage of the first bill of its kind requiring statewide licensing and regulation of medical marijuana, she formalized the enterprise and grew it to four dispensary locations, cultivating for and dispensing to over 5,000 patients. The business was nationally recognized for its high-quality cannabis, patient advocacy and education and industry lobbying efforts.

Our business model and methods are informed by our background as patient advocates, policy experts and experienced medical marijuana operators. The Level II license opportunity will allow the Company to leverage our expertise and implement clean cultivation methods that have proven successful in multiple jurisdictions and at much larger scales. Our methods have been certified in multiple jurisdiction as pesticide free by an independent third-party certifier. Additionally, our standard operating procedures have also received third-party certification as patient-focused by a national non-profit patient advocacy group. The patient focused certification audits the safety of our cultivation methods for both patients and employees, as well as the quality of our labeling, educational product materials and adverse reporting systems for physicians, patients and caregivers.

EXPERIENCE AND QUALIFICATIONS

Our COO joined our CEO’s business in 2010 and oversaw standard operating procedure (“SOPs”) development, hiring and training for the cultivation facilities, as well as the manufacturing/processing and four dispensary locations. Together they have been responsible for the successful licensing and final inspections for dozens of medical marijuana operations across the country. Most recently, they have implemented cultivation operations in two new markets overseeing construction, purchasing, hiring, training and on-site operations for our clients. Both facilities are located in economically distressed areas. Our team successfully on-boarded and trained local residents who possessed no previous medical marijuana experience for all staff and middle management positions. During this time, they also consulted for start-up manufacturing/processing and dispensing operations in four other jurisdictions.

In 2011, our CEO and COO enlisted the assistance of a Certified Horticulturalist to create Best Management Practices (“BMPs”), SOPs and training programs for their three cultivation operations. The program they developed together with the expert horticulturalist evolved into one of the only published books on BMP for commercial cannabis operations available. The protocols they initially drafted based on traditional Good Agricultural Practice, Good Handling Practice and USDA Organic Standards were also used as a starting reference for the development of a national trade association’s recommendations

to regulators for cannabis cultivation. Many of the recommendations have been adopted in published regulations throughout the United States.

Our BMPs and SOPs have continued to evolve as we have implemented them in multiple operations. As we have added the use of biostimulants and calcium-based nutrients, our SOPs have evolved to incorporate more and more advanced plant care techniques. Our current methods have been certified by:

- A qualified third party non-conflicted agricultural certification program that supports sustainable practices and environmental stewardship; and
- A third-party certification program for the medical cannabis industry based on quality standards for medical cannabis products and businesses issued by the country’s leading trade association for all herbal products.

The Company plans to certify the Ohio operations if awarded.

ADDITIONAL RESOURCES

In addition to our Principal Officers, the Company has a strong network of highly qualified and reliable professionals they have worked with previously to provide support to the business as needed. These professionals are highlighted in detail in our business plan in Section 2A. In addition to legal and financial services, we engage subject matter experts to assist with greenhouse technology and cost reduction and scientific experts to assist on breeding projects and to help increase yields.

PART II: CULTIVATION METHODS AND PROPOSED STRAINS

(A) CULTIVATION METHODS

Our CEO and COO are both seasoned cultivators and have participated in the development of industry standards for the last eight years through trade association committees and as consultants. Our CEO has been a paid consultant and workgroup member for several regulatory agencies across the country. She has developed recommendations for regulators and standard operating procedures that are method-agnostic but fully address good agricultural practice and that can be applied to hydroponic, aeroponic or soil mediums and that can be applied in indoor, outdoor, or greenhouse facilities with some customization for each type of operation. However, her career in medical marijuana initially began as the wife of a patient concerned about the lack of quality medical marijuana available. And while our team has assisted clients across the country implement a variety of cultivation methods, for this project, the Company has adopted the only cultivation techniques we will use in our own operations, methods that we know are safe and sustainable from a financial and an environmental standpoint.

The Company is committed to utilizing the safest crop inputs available to ensure purity of crops. Our cultivation method includes the use of calcium based nutrients in “true living organic” environments. The true living organic method was introduced in 2012 book by a prominent cultivator and promotes the use of microbes in the soil to create a living environment where the organic matter interacts to feed the plants. This method allows for a significant reduction in the use of traditional nutrients and supplements. Soil is maintained in “permanent beds” and reused and reconditioned for each new crop reducing crop inputs used and waste. Our methods incorporate the true living organic concepts with a custom

combination of biostimulants and calcium-based supplements, which work together to improve plant health, yield, quality and tolerance of abiotic stresses. Our methods concentrate on building natural plant tolerances to disease and pests at a cellular level using calcium based nutrients as opposed to conventional salt-based nutrient systems. The system has been proven to achieve yields that surpass conventional and traditional “organic” methods with a cost slightly above other methods.

A designated Cultivation Manager will be hired and trained to carry out the operational policies and procedures detailed in our SOPs. In addition to procedural compliance, the Cultivation Manager will be responsible for oversight and on the job training of employees, the prevention and management of plant disorders and will follow a general plant healthcare checklist to ensure a healthy cultivation environment. Our SOPs require daily surveillance and plant care and handling tasks to ensure that any disease or pest issue is discovered immediately. All cultivation, harvesting and curing practices will be overseen by our Principal Officers and all required documentation will be maintained in accordance regulation and our SOPs.

Best Management Practices

The company is dedicated to the purity and safety of its medical marijuana. Good Agricultural (“GAP”), Good Cultivation (“GCP”) and Good Handling Practice (“GHP”) are incorporated in our SOPs. Food safety protocols are included wherever applicable. The company has also adopted medical marijuana cultivation standards from the American Herbal Pharmacopeia and the American Herbal Products Association and adapted USDA Organic Standards and FDA standards to create a holistic crop management system specific to the cultivation of medical marijuana. The company has adopted or adapted the use of following publications:

- An introduction to on-farm food safety practices, Canadian Federation of Agriculture.
- HACCP principles and application guidelines, National Advisory Committee on Microbiological Criteria for Foods.
- Guide to minimize microbial food safety hazards for fresh fruits and vegetables, Center for Food Safety and Applied Nutrition.
- Medical Marijuana Cultivation Operations, American Herbal Products Association.
- A workbook on Greenhouse Gas Mitigation for Agricultural Managers, Government of Alberta, Canada, Agriculture, Food and Rural Development.

Best Management Practice (“BMP”) employs a combination of practices, that is determined to be an effective and practicable (including technological, economic and institutional considerations) used to operate a business. The Cultivation Manager will be responsible for the implementation and supervision of our BMP protocols which focus on proper soil management, efficient crop production, effective crop protection, proper harvest, processing and storage techniques, energy conservation and minimizing waste. Additionally, our BMPs address human welfare, health and safety through our employment practices and safety programs.

Staffing Policies

The pesticide free cultivation methods employed by the Company require vigilant care and attention to detail Cultivation is a labor-intensive activity that requires physically demanding work and in our experience, well-trained employees who are proud of what they do are productive and diligent even when performing routine tasks. We know to achieve and maintain our quality standards within budget our employees must feel that they are valued and critical to the operation. We will create a culture of

employee pride in our company values, specifically our cultivation methods. We rely heavily on our past operating experience to ensure our employees have the training and resources they need to feel productive and accomplished in their roles.

As a small, Level II operator, our plan staffing plan utilizes cross-training and multi-functional roles at the executive, managerial and staff levels to maintain an efficient operation. A minimum of two level 1 key managers will be on-site at all times and each manager will be trained to supervise each department. Employees will be trained to cross over to fluidly move between tasks. Our Principal Officers successfully hired and trained hundreds of employees in our own operations and in our clients' start-up operations. These teams have ranged from small eight-person cultivation crews to vertically integrated organizations with dozens of employees. Highly supervised on the job training to our SOPs is our primary training method. We also employ workshop style training for transportation, safety and security training and frequently use training tools including video SOPs and educational posters throughout the facility to ensure proper performance of critical tasks.

Production Planning

The mission of the Company is to provide a clean, consistent supply of medical marijuana. Our Principal Officers have participated in several start-up markets providing us in-depth experience in production planning. Our team has never experienced a crop failure or significant production lag in any of our projects. We assume in our model that patient registration in Ohio will ramp-up over a four- to five-year period. We also assume that as a Level II cultivator, we can capture approximately two percent of patient demand. Our assumptions are more fully discussed in our financial plan in Section 2E. We plan to begin operations utilizing 50% of our cultivation area for vegetation and cultivation increasing to reach full capacity into our third year of production. Our facility design allows to easily ramp production up and down to meet demand.

The facility is designed for the cultivation and processing of approximately 250 pounds of finished medical marijuana each harvest cycle (5.2 cycles per year) at full capacity prior to any expansion that may be allowed by MMCP. The Company will take actions to ensure an appropriate quantity of medical marijuana is consistently produced to meet the projected needs of processors and dispensary facilities. The COO and General Manager will determine the number of medical marijuana plants to cultivate based on the known patient base with consideration for a ramp-up in the patient population over time. The explicit goal of such projections is to avoid excess production, which poses an additional security risk and results in financial loss and degraded product. The General Manager will regularly review and determine the need for excess inventory disposal in coordination with the COO and in compliance with regulations.

(B) VARIETIES PROPOSED

As legal medical marijuana markets increase in number and size, research proving the inconsistencies with the genetic lineage of a single strain is becoming more prevalent. For example, a strain named "Blue Dream" produced by one facility is most likely genetically different from the seemingly same strain produced by another cultivator. For this reason, the industry is moving away from relying on strain names to indicate the efficacy and instead reference the cannabinoid profile of the cannabis plant. The Company believes assessing cannabinoid profiles is a superior method of selecting varieties.

The Company has access to a large portfolio of genetics with a wide variety of profiles. Our initial production plan will incorporate a variety of strains known to produce a wide range of cannabinoid profiles. We plan to begin propagation using trusted seed stock. Once sprouted, we will extract DNA from the seedlings and use a technique called real-time polymerase chain reaction to identify male plants for removal and destruction. This allows us to conserve labor and resources while creating an initial inventory of hundreds of phenotypes. We record plant characteristics and analytical test results throughout the cultivation cycle and preserve the varieties with most beneficial traits. We utilize seed stock in our projects to ensure only clean genetics are introduced to the facility preventing the transmission of systemic disease through the transfer of plant materials.

We have established a portfolio of seed stock through our years of breeding efforts. We propose to cultivate a variety of strains developed to yield several different cannabinoid profiles, primarily those that produce high levels of CBD, CBG and THC. Our Cultivation Manager will be trained by our Principal Officers to maintain sufficient records to track, monitor and make reasonable judgments about the effectiveness of our crop management methods on each of the strains being cultivated by analyzing:

- Time and materials;
- Yield;
- Cannabinoid profile;
- Other test results; and
- Feedback from processors and patients.

The Company regularly reviews available purchasing data from a national cannabis data analytics firm based on the approved list of conditions and diseases from several medical marijuana markets allowing us to identify which strains and products are being sought out by patients. We utilize this research as a factor in our strain production decisions in each market where we operate. The Company will also implement a patient feedback system that we have effectively implemented in other operations. A variety of methods will be employed to collect feedback including dialogue with processors and dispensaries, structured patient surveys, solicited product reviews and patient interviews and focus groups.

(C) RESEARCH PLAN

As a small operator, our capacity to engage in meaningful research is limited by our physical size and financial capacity. The Company does currently engage in internal research and development projects centered around breeding. We work with an independent Genomics and Breeding Consultant that aids us in the deployment of scientific tools already proven successful in other agricultural sectors including marker assisted breeding. Our CEO and CFO were introduced to the Consultant through the seed stage cannabis incubator program where they are mentors. The new consulting firm is founded by several experts in plant science with extensive cannabis experience. The Company will engage the Consultant for this project immediately for genomics and breeding advice to produce new varieties with disease resistance, better agronomic traits and unique chemical profiles.

Security

Detailed information on security protocols and equipment is provided in the Section 2D - Security Plan.

- The design incorporates multiple overlapping security systems utilizing commercial grade equipment to prevent and detect diversion, theft or loss of medical marijuana.
- The facility design incorporates the appropriate placement of security features and equipment including visitor holding areas; restricted access areas; alarms and motion detectors; video cameras all points of entry and exit and areas holding medical marijuana materials; centralized placement of vaults and storage areas; and a secured room for all security system equipment and recordings.
- The facility is designed to be securely locked and protected from unauthorized entry at all times, but allow for emergency egress. The outside perimeter of the facility is fenced and gated and highly illuminated after dark.

Safety and Sanitation

Detailed information on quality control protocols is provided in Section 2C - Quality Assurance Plan

- The design and construction features of the facility of suitable size, construction and materials to facilitate safe operating conditions for employees and adequate cleaning, maintenance and sanitation activities.
- The facility designed with adequate lighting and ventilation in all areas and adequate bathroom and washing facilities including hot and cold water easily accessible from work areas throughout.
- Potable water is supplied under continuous positive pressure in a plumbing system free of defects that meet the standards prescribed in the Environmental Protection Agency's Primary Drinking Water Regulations. Drains are designed with adequate size and, where connected directly to a sewer, are designed to prevent back-siphonage.

PART V: STANDARD OPERATING PROCEDURES

QUALITY MANAGEMENT SYSTEMS AND DIVISION OF DUTIES

The Company has developed and implemented comprehensive SOPs and quality management systems for all operational activities in several jurisdictions and types of facilities. Our SOPs are detailed in our training manuals and create the foundation for our proposed operations. Our quality management system prescribes that the Cultivation Manager will update the company's cultivation SOPs when new regulations are adopted or when operational changes warrant revisions. The General Manager is responsible for the oversight and maintenance of all the Company's SOPs to ensure compliance with regulations and to prevent any technical violations.

The Company utilizes a variety of SOP formats, including:

- Simple steps – for routine procedures that are short and require few decisions.
- Hierarchical or graphical – for long procedures consisting of more than ten steps, with few decisions.
- Flowchart – for complex procedures requiring several decisions.
- Video – for all SOPs that can be visually demonstrated.

The Company's SOPs are living documents intended to establish and maintain our quality systems. Regular reviews are performed by the appropriate manager or Principal Officer to ensure continual process improvement. Immediate revisions are required when a severe incident reveals a deficiency or error in any existing SOP. Our SOP development and revision procedures entail a multi-step process including:

- Planning/drafting – by the responsible manager or Principal Officer
- Internal review – by employees involved in the activity
- External review – by subject matter experts and compliance and legal advisors as necessary
- Testing – following the SOP step by step to ensure accuracy
- Approval – approved by the CEO or COO
- Posting – finalizing the written SOP for the manual, posting in appropriate work locations and recording the process on video for intranet posting
- Training – training or re-training employees as necessary

(A) SUMMARY OF CULTIVATION SOPS

Propagation

All propagation material will be properly identified by genus, species, variety and chemotype. The Cultivation Manager will ensure that all plants are traceable to origin and are free of pests and disease. The Cultivation Manager, in coordination with the General Manager, will determine the mix of strains to be cultivated. The following items (at a minimum) will be considered when determining strain selection:

- The availability of the strain;
- Medicinal benefits;
- Other strains currently in production;
- Average yield;
- Length of cultivation cycle;
- Patient demand;
- Amount of plant material and quality available for extraction; and
- Difficulty of processing.

Transplanting and Soil Handling

An appropriate designee, under the Cultivation Manager's oversight, is responsible for overseeing all transplants and media handling during transplants. The following items at a minimum will be taken into considerations for each transplanting activity:

- Transplants are not placed into dry soil and a dry root ball is never transplanted, no matter how wet the soil.
- Soil is never compacted into containers. Containers are lightly filled with the excess soil gently brushed off the top.
- Soil is hydrated and left to sit overnight after so the pH can begin to adjust itself into a desired range. Failure to do this can result in low pH environments that can impact yield.
- Soil is tested for pH, electrical conductivity and moisture level before using for transplants.

- The next day any air pockets in the container or plant bed are filled with moistened soil after the second irrigation.

Crop Applications

All crop applications will follow established spraying and feeding protocols enforced by the Cultivation Manager. Each cultivation employee will review the spraying and feeding schedule daily and complete all required record keeping. Each employee is responsible for following the established protocol unless otherwise directed by the Cultivation Manager.

The Company will not add any additional active ingredients or materials to medical marijuana plants that alter the purity, color, appearance, smell, taste, effect or weight of the medical marijuana. All crop applications, including foliage sprays, nutrients and or substances allowed by our third-party certifier will be documented in detail as required for operational needs and to comply with by all applicable laws and regulations. Crop application logs will record each substance used as a production or handling input, including at a minimum:

- Date applied;
- Location and crop ID from the inventory management system;
- Material product name;
- Source/manufacture (for custom in-house applications, list the constituent ingredients and recipe including quantities mixed);
- Purpose/reason for use;
- Organic status verification; and
- Application method and rate/amount.

Fertilizer and Soil Management

The Cultivation Manager will implement procedures to maintain or improve soil/media organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Soil and media temperatures will be maintained below 95°F at all times to prevent root rot. The Cultivation Manager may utilize any type of media that is safe for cultivation and will consider the following when selecting plant media:

- Cleanliness;
- Saturation rate;
- Uniformity;
- Availability; and
- Cost of nutrient required.

The Cultivation Manager may implement fertilization methods appropriate for each strain including hand application, ebb and flow systems and injection systems. Generally, small fertilizer doses will be applied to crops over a determined period of time to avoid over-feeding and burning of the leaves. The Cultivation Manager will only utilize fertilizers that are rated food or pure quality and approved for use by our third-party certifiers. Nutrient solutions, compost teas and other substance mixtures applied to plants will be prepared by the Cultivation Manager or a designated, highly trained employee. Each mixture will be recorded in the crop application log, assigned a descriptor and labeled with an identification number for application records.

Disease and Pest Management

As a certified natural and pesticide-free cultivator, acceptable methods of disease management are limited and must be approved by the COO or CEO. Our disease and pest management protocols include, but are not limited to:

- Soil, media and crop nutrient management practices contained herein.
- Sanitation measures to remove disease vectors and habitat for pest organisms.
- Cultural practices that enhance crop health, including selection of plant species and varieties with regard to suitability to site-specific conditions and resistance to prevalent pests, weeds and diseases.
- Integrated Pest Management (“IPM”) including, but not limited to:
 - Augmentation or introduction of predators or parasites of the pest species;
 - Development of habitat for natural enemies of common pests; and
 - Mechanical controls such as lures, traps and repellents.

Plant disease risk is controlled through sanitation practices which suppress the spread of disease organisms and the application of biological, botanical, or mineral inputs approved by our third-party certifier.

Pruning

Pruning is a technique used to shape and maintain plant structure by cutting or pinching specific areas of the plant. Ideally, pruning will occur during the second and third week of the vegetative cycle and never in the flowering cycle. The Cultivation Manager is responsible for communicating to support staff how and when plants will be pruned.

All records are required to provide sufficient detail to allow trace-back of any packaged lot to its specific cultivation history. The inventory management system will record transfer and transportation records, with sufficient detail to trace each batch throughout its chain of custody, from the cultivation facility to the purchaser.

Hygiene and Sanitation

The Cultivation Manager will enforce all sanitation and safety SOPs. In the event any manager believes an employee responsible for the handling of medical marijuana or components is ill, they will terminate the employee’s shift immediately. If upon return to work, the Cultivation Manager still suspects the employee is ill, he or she will require the employee to obtain a physician’s release to return to work in the facility.

Water Quality and Conservation

The company recognizes the limited water resources that exist and water conservation is a focus in our SOPs. Cannabis has a low crop coefficient and typically require approximately five gallons per 45 square feet daily during peak demand (late flowering phase); however, water conservation is still a top sustainability goal of the Company.

The Cultivation Manager will test the water source quarterly, after any unusual natural event (flooding) and whenever PPM/pH readings change significantly. Testing will identify pathogenic microbes that may be present in water supplies (e.g., E-coli and other coliforms), heavy metals, pesticide residues, or

other contaminants. All water used in the facility will, at a minimum, meet Human Health Standards for water quality. The following steps will be implemented to ensure water quality and conservation:

- Plants will be grouped by strains for watering efficiency and all watering activities, including water source, water volume, which plants and when, will be documented daily.
- All employees will be trained on the proper handling and storage of water with a focus on avoiding contamination.
- Water and nutrient solutions will not sit in the open environment for longer than eight hours. If agitation and aeration pumps are used, water may sit in an open environment for no longer than twenty-four hours.
- No nutrient solutions will be disposed into a public drain without confirming label instructions and applicable laws and regulations.
- Only highly trained employees will be responsible for irrigation and regular sanitation and maintenance of water equipment.
- Irrigation equipment will be professionally maintained per the manufacturer's recommendations. Any parts that may be a source of contamination will be cleaned and replaced as often as needed.
- Employees will be required by SOPs to check for signs of water quality changes daily including:
 - Build-up of lime scale indicating high calcium and magnesium or sulfate.
 - Red and black particles and stained fixtures indicating high iron or manganese.
 - Cloudiness indicating increased levels of chloride.
 - A rotten odor and tarnished copper indicating sulfides.

Harvest and Processing

All plant processing operations (harvesting and trimming) will be performed in limited access areas with full surveillance camera coverage in accordance with our security policies and procedures. During processing operations, crops will be protected from:

- Contaminated or defective equipment;
- Moisture during harvest, handling and storage to minimize growth of yeasts and molds; and
- Contact with rodents, insects and other pests to prevent contamination.

During harvest operations, crops will be moved to the trim area as soon as possible to prevent degradation of the crop. Harvest containers will be maintained at levels so that no compacting occurs. Extensive recordkeeping is required for all processing activities including harvest and processing. Harvest records, at a minimum, will include:

- The quantity of the harvest;
- Dates of planting and of harvest;
- The life cycle stage of the crop at the time of harvest;
- Relevant crop conditions throughout its cultivation; and
- Beginning and ending processing weights of each batch.

Processing records will be logged in the Company's crop processing log and in the inventory management system and at a minimum, will include:

- The identification of the area in which any processing operation was undertaken for each crop including relevant information about pest control plans and cleaning procedures.

- A description of equipment used in all processing operations including information about equipment maintenance. Equipment information will be sufficient to demonstrate the condition of the equipment at each harvest.
- Relevant information to identify the water source for processing including records sufficient to demonstrate the water quality at each harvest.
- A list of each employee working in each processing operation. Relevant information about employees including logs and procedures will be sufficient to also describe the steps that are taken to ensure worker safety and hygiene.
- Documentation of environmental conditions and process times; the beginning and ending moisture content of each batch; and any additional information relevant to the drying process.
- Beginning and ending weights of each crop will be maintained in the inventory management system.

Quality Measures

The Cultivation Manager, in coordination with the Quality Assurance Director, will implement and maintain the Company’s sanitation and quality SOPs to ensure safety and quality of crops, including purity and consistency. All necessary precautions will be taken during the cultivation and processing of medical marijuana to prevent contamination. The Company’s SOPs require daily scouting and surveillance of all crops in production utilizing a quadrant method that virtually divides cultivation areas into sections where similar strains are placed. Employees are provided in-depth training and required to systematically scout each quadrant daily and record all observations. Any employee who identifies a high-priority scouting item including evidence of pest colonization, plant disease, or sex transformation (hermaphrodites) is rewarded with a cash bonus or paid time off.

The Cultivation Manager will oversee scouting and surveillance schedules for each crop in production. Detailed visual surveillance (crop scouting) of each crop will be performed and documented daily. The following tasks are required by our SOPs:

- Signs of pest infestations.
- Changes in biological colonies.
- Mold and mildew.
- Leaf and tip burn, discoloration and spotting.
- Changes in appearance of the media.
- Changes in stalk density and branch elasticity.

The Cultivation Manager will schedule regular in-house quality control tests based on current operational needs and record the results in the crop management log. A detailed description of our Quality Control and Quality Assurance protocols is provided in Section 2C – Quality Assurance.

RESPONSIBILITIES MATRIX

As a small operation, our Principal Officers, managers and staff will be responsible for a wide variety of tasks. The following chart illustrates a small sample of the division of responsibilities and duties within the organization.

(B) ENVIRONMENTAL PLAN AND SUSTAINABILITY GOALS

Greenhouse Cultivation and Alternative Energy

In addition to our energy efficient greenhouse facility described above, solar arrays and wind generators, the Company will actively work to minimize the environmental impact of our operations by selectively choosing sustainable, locally available materials and implementing environmentally conscious operating practices. The facility is expected to produce average levels of plastic, glass and aluminum waste based on our proposed number of employees. As options to reduce environmental impact continue to become more accessible and economically feasible, the Company will continue to evolve day-to-day practices and adopt these new technologies.

The Company's current design plans described above incorporate alternative energy sources including solar arrays and wind generators with batteries for storage. The Company will participate in local renewable energy programs. Additionally, once profitable, the Company plans to purchase carbon offsets to mitigate greenhouse gas emissions from our operations from the Cleveland Carbon Fund or similar entity.

Reducing Consumables

The Company will use biodegradable and recyclable packaging whenever possible for all storage, handling and packaging needs. Local suppliers of materials will be selected when cost-competitive to reduce the carbon footprint resulting from shipping. We will also reduce waste by reusing all consumables for as long as they are sanitary and functional. The Company will select reusable over disposable products, for tools and supplies such as pots, plant stakes and storage buckets. We will use a laundry service for uniforms and towels to limit our use of disposable paper towels.

Odor and Waste Reduction and Recycling

Recycling

The Company will provide recycling bins for assorted plastics, glass, aluminum and paper products. We will engage with local waste management facilities to schedule recycling services and regular pick-ups. We will also ensure the implementation of proper resource disposal techniques for the removal of all regulated or toxic materials including bulbs, nutrient waste, electronics, etc.

Composting

The Company will minimize facility waste by composting on site to process organic waste materials to create new, nutrient-rich soil supplements. All composting will follow MMCP regulations and local environmental agency rules. Composting will be supervised in a manner that does not adversely impact public health, safety and welfare, sanitation in the facility or the surrounding environment.

Scrubbing Exchanged Air

The Company will maintain high air quality inside the facility for the benefit of our employees and crops by utilizing air-scrubbing technology. The incorporation of a negative pressure air handler will help limit the spread of contaminants within the structure and will help maintain healthy air quality in and out of the facility. Odor control will be addressed using design features and physical means prior to chemical means. For instance, exhausted air will be routed to disperse above the greenhouse gable roofline preventing odor contamination at the ground level.

Paperless Communication

Email and other direct messaging services are used as the primary channel of communication between management, employees, customers and vendors, to reduce the Company's paper waste. The Company will utilize secure cloud-based tracking systems to store electronic forms of all compliance documents, allowing for mobile access and the reduction of our paper use.

Chemicals Handling and Disposal

The Company's cultivation methods do not result in the production of toxic wastewater or runoff. Any wastewater or runoff generated from other activities, such as cleaning, will be captured in holding reservoirs and reused to the extent safely possible (i.e. cleaning of trays outside will be performed on a sloped surface used to route runoff water to a holding tank).

As a certified pesticide-free cultivator, the Company will eliminate exposure of harmful pesticides to employees, patients and the environment by using alternative methods of pest control. Such alternative pest control methods include the introduction of predatory insects (only as a last measure), naturally derived foliar sprays, mechanical traps and a range of OMRI applications when needed.

Antimicrobial building materials will be used where possible to reduce the use of chemical cleaning supplies and reduce waste into sinks. Steam cleaning technology will be used for sanitization as a sustainable alternative to chemical cleaning agents. All chemicals solutions necessary for cleaning and other tasks will be disposed of according to label instructions and never emptied down a drain pipe.

The Company will utilize a designated quarantine room to intercept and eliminate the spread of pests and diseases. The quarantine room prevents the need for the use of toxic synthetics commonly applied during the mitigation of larger issues occurring in an open-plan cultivation facility layout.

Power Conservation

The Company will utilize equipment with heavy power usage during nighttime hours whenever possible to reduce electricity demand during the day. The facility will install electronic ballasts for supplemental lighting to reduce power and HVAC usage while increasing light output. Also, when installing equipment, the Company select products certified by Energy Star whenever feasible.

The Company will use ceramic and LED lamps as the primary source of supplemental lighting in the greenhouse facility. These bulbs can reduce electricity use up to 70% compared to the traditional high-pressure sodium ("HPS") or metal-halide (MH) lamps. The low voltage also reduces the risk of accidental fires or electric shocks if exposed to moisture. LED lamps in particular do not degrade and rarely need replacing as opposed to HPS and MH, which need replacing every 3-4 cultivation cycles.

LED lamps are also easy and safe to replace because they do not contain vapors, mercury or glass. LEDs and ceramics both also eliminate the need for replacement of hood assemblies prone to interior reflector degradation seen with HPS bulb use which typically require replacement every two or three years. Additionally, ceramics and LEDs generate less heat than traditional HPS or MH lamps, reducing power draw for cooling.

Water Conservation

Even though cannabis is a low-coefficient crop, cultivation can often be water-intensive, especially in hydroponic systems. Hydroponic cultivation also produces more nutrient pollution when compared to

other growing methods. The Company utilizes a soil-based cultivation method and does not incorporate run-through watering techniques unless required to adjust pH or address other soil problems. Reverse osmosis water filtration methods will also be avoided due to inefficiency. Instead zero-waste filtration technology will be utilized as it produces filtered water quality without directing brine byproduct to waste.

The Company does not create wastewater or runoff from our cultivation methods; however, any wastewater or runoff generated from other activities will be captured along with rainwater in holding reservoirs and reused to the extent safely possible.

PART VI: STAFFING AND TRAINING

HIRING

The Company's General Manager will ultimately be responsible for hiring and oversight of all staff in coordination with the COO. The General Manager will be familiar with the layout and technical specifications of the facility, all equipment utilized and able to perform and train others to perform all job functions. The Company is dedicated to training all employees to excel in their position through on-the-job training and classroom learning opportunities. Third-party training will be provided when determined to be beneficial by the COO and may include training on personnel safety, food safety, good agricultural practice and management practices.

Only individuals who are well-qualified to perform their assigned job responsibilities will be employed by the Company. These employees' qualifications will be documented and may consist of formal education, direct or applicable work experience, criminal history records, background check results, training and certification records and other applicable information. Employees will be hired based on their level of scientific and technical understanding, product knowledge, process knowledge and risk assessment abilities. Upon hire, the Company accepts full responsibility for the training and oversight required for employees to ensure to compliance with our SOPs and all applicable laws and regulations and to ensure a consistent and uninterrupted supply of quality medical marijuana.

The CEO and COO will hire and train the initial team necessary, including the General Manager. Staffing needs will be reviewed regularly by our Principal Officers. As a Level II operator, the facility features a relatively small footprint. Additionally, our Principal Officers will play an active role in the day to day operations of the Company and serve in multiple positions as needed. As a result, we have a relatively small initial hiring plan consisting of the following positions:

- General Manager – 1 FTE (full-time employee)
- Controller/Human Resources Manager – 1 FTE
- Administrative Assistant – 1 FTE
- Cultivation Manager – 1 FTE
- Compliance/Inventory Manager – 1 FTE
- Processing (Harvesting) Manager – 1 FTE
- Cultivation Technicians – 2 FTE
- Maintenance Technician – 1 FTE

Many of the positions listed above will split into two full-time positions as needed or upon any expansion allowed by the MMCP.

The Company's employee acquisition process will vary depending on the vacant position and any special circumstances. Job openings may be advertised using internal job postings, external job boards, staffing agencies or executive search firms. The Company will not hire any person that does not meet the eligibility requirements for the position. All employees must be 21 years of age or older. In addition to exclusions in the regulations, our policies exclude from hiring consideration individuals who have been convicted of any theft; violent crime; or felony sale or possession of controlled substances. Other items discovered through the reference check process may be considered when making a hiring decision including, but not limited to:

- A history of multiple arrests or acts of negligence.
- Unverifiable resume or application statements.
- Negative reference checks or inability to obtain a positive reference from any former employers.
- An unexplainable lack of stability in work history or residence.
- Former employment with any independent laboratory providing services for the operation or physician's office providing medical cannabis patient certifications.

All Company employees must be approved by the MMCP and receive an employee handbook prior to employment. Employees are required to continually demonstrate a working knowledge of handbook and training materials as a condition of employment. All employees are also required to have a working knowledge of the crop production standards established by the CEO and COO.

TRAINING

It is the Company's policy to ensure that all employees receive professional and appropriate training on compliance with regulation, the therapeutic use of medical marijuana and cannabinoid science, safety, security, incident management and diversion and theft prevention. No employee may work on-site prior to receiving an initial orientation training by the General Manager or a Principal Officer. Employees who have not received critical training updates will also be suspended from working in the facility until the training is received. Critical training includes compliance, safety and security training necessary for day to day operations. The General Manager, in coordination with the COO, will approve any third-party training and certification programs for cultivation staff. Currently, outside training and audit programs utilized by the Company include:

- Agricultural Medicine & Health Trainings (University Extension Program)
- Food Safety Courses in multiple jurisdictions provided by state-approved programs.
- Food Industry Alliance, Inc. (FIA), Food Safety Certification Program
- International Food Protection Training Institute: FDA Pest Control in Food Establishments, Plumbing Controls for Commercial Food Establishments and HACCP trainings.
- Patient Focused Certification Training (Americans for Safe Access)

The Company's SOPs require annual training dependent upon each employee's position and duties. As a small operator, cross training is required for all key employees which allows for the continuation of normal operations even when key employees are absent or leave the Company. All employees, regardless of their position will undergo an orientation training provided in-house or by a third-party covering:

Core Cannabis Training

- Cannabis Research and Clinical Data
- Cannabis-Based Medicines
- Quality of Care
- Legal Rights
- Robbery Preparedness
- Fire and Other Life Safety

National Cannabis Standards and Best Practice

- Good Cultivation Practices
- Pesticide guidance
- Facility requirements
- Water resource management
- Recordkeeping
- Product safety recall systems
- Adverse event reporting
- Information disclosure
- Best practices and safe handling procedures for post-harvest processing

Ohio Specific Legal and Compliance

- Local and State medical cannabis laws
- Broad regulatory overview
- How those laws apply to employees, as well as to other licensed businesses and patients

Other Third-Party Training as Needed

- OSHA Safety Training
- Red Cross First Aid Training

Security and Diversion Training (provided by Company's Outside Security Firm to highlight external security risks and internal diversion risks).

On-the-Job Training

On-the-job training is the Company's most frequently used method of training. Generally, only qualified managers may provide employees with structured training. To become a trainer within the Company, a manager must demonstrate proficiency and complete an approved Train-the-Trainer program. The benefits for trainer managers themselves include enhanced skills and knowledge, mastery of materials, and knowledge transfer to the Company's employees. The Company gains increased organizational knowledge and a staff that continually engages and operates in a training-based environment. The American Management Society and the American Society for Training and Development host approved Train-the-Trainer programs multiple times each year. The CEO will review these training programs regularly to determine if they are sufficient for the Company's needs.

To assist in employee training, Level 1 Key managers may select responsible and promising employees to become designated trainers for limited job functions (i.e. a dedicated key employee to train

individuals on the inventory control system). Managers will also utilize these employee trainers to develop peer-to-peer trainings once per month (i.e. an update on plant feeding schedule changes or a new terpene profile appearing in analytical results). Examples of on-the-job training includes:

- Mock recalls –employee training and tests our product recall SOPs
- Regulatory and compliance – provides employees a thorough understanding of the rules and their responsibilities
- Quality control – explains the duties of each employee and highlights the importance of procedures and the consequences of failing to follow them
- Safety and security – reinforces the importance of human, medical marijuana inventory and facility security

Frequent reinforcement of training goals, reviews of efficacy, and annual performance assessments of employees by their supervisor will determine each employee’s knowledge of and adherence to SOPs and identify re-training needs. A written record documenting any completed training activity will be signed by the participants and trainer for each training session and maintained in the employee’s record. The General Manager will be responsible for creating a position-specific training schedule for each employee at hire, scheduling training sessions and tracking training requirements.

EMPLOYMENT PRACTICES (OPTIONAL SECTION)

The Company provides equal employment opportunities for all individuals without regard to their race, color, sex, sexual orientation, gender identity, religion, or national origin. The Company is committed to fair employment practices and promoting diversity in the medical marijuana industry and has adopted an affirmative action plan (“AAP”) to ensure that the diversity of the Company is reflective of each community where we operate. We believe that bringing together workers with different qualifications, backgrounds and experiences is key to on the job problem solving and innovation within the organization. Our executive management team is led by two females who have committed significant time and energy into creating opportunities for women in the medical marijuana field. The Company adapted its AAP structure using the U.S. Department of Labor’s guidance for small businesses. The COO is responsible for the management of the company’s AAP with oversight by the CEO. These responsibilities include, but are not limited to, the following:

- Maintaining our Equal Employment Opportunity (EEO) policy statements, affirmative action programs, and internal and external communication procedures; and
- Designing and implementing an internal audit and reporting system that measures the effectiveness of the program; determines the degree to which AAP goals and objectives are met; and identifies the need for remedial action.



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

2C Quality Assurance (Maximum of 30 pages, see instructions for formatting)

**Please note: The following must be submitted in a non-identified format.
Include this form as a cover page.**

Applicant should provide a narrative detailing support for the following:

Part I: Packaging and Labeling

Elements of a quality assurance plan shall include best practices for the packaging and labeling of medical marijuana. (3796:2-1-02(B)(4)(b), 3796:2-1-03(B)(3)(b))

Part II: Production Control

Intended use of pesticides, fertilizers, and other agricultural products or production control factors in the cultivation of medical marijuana. (3796:2-1-02(B)(4)(a), 3796:2-1-03(B)(3)(a))

Part III: Inventory Control

An inventory control plan. (3796:2-1-02(B)(4)(d), 3796:2-1-03(B)(3)(d))

Part IV: Disposal and Waste Removal

Standards for the disposal/destruction of medical marijuana waste and other wastes. (3796:2-1-02(B)(4)(e), 3796:2-1-03(B)(3)(e))

Part V: Adverse Events and Recall Procedures

Recall policies and procedures in the event of contamination, expiration or other circumstances that render the medical marijuana unsafe or unfit for consumption, including, at a minimum, identification of the products involved, notification to the dispensary or others to whom the product was sold or otherwise distributed, and how the products will be disposed of if returned to or retrieved by the applicant. (3796:2-1-02(B)(4)(f), 3796:2-1-03(B)(3)(f), 3796:2-2-03)



Ohio Department of Commerce



Medical Marijuana Control Program (MMCP)

Part VI: Record Keeping and Regulatory Compliance

(A) Record keeping policies and procedures that will ensure the facility complies with rule 3796:2-2-08 of the Administrative Code. (3796:2-1-02(B)(5)(a))

(B) Implementation and compliance with the inventory tracking system. (3796:2-1-02(B)(4)(c), 3796:2-1-03(B)(3)(c), 3796:2-2-04)

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PART I: PACKAGING AND LABELING

PACKAGING AND LABELING OVERVIEW

The Company's Quality Management System employs standard operating procedures ("SOPs") to govern the activities of our employees. Our SOP system is described in detail in Section 2B – Operations Plan.

All harvested medical marijuana intended for distribution will be packaged in a sealed and properly labeled container. All medical marijuana packaging will be tamper-evident, child-resistant and light-resistant consistent with current standards, including the Consumer Product Safety Commission standards referenced by the Poison Prevention Act. The General Manager ("GM") and Chief Operating Officer ("COO") will ensure all packaging and labeling complies with the Ohio Medical Marijuana Control Program ("MMCP") regulations.

The Company will package and label within our licensed facility each form of medical marijuana prepared for sale. The original seal of the package may not be broken except for quality control testing at a laboratory, for an adverse loss investigation or by the end recipient. In addition to the labeling process described in detail below, all product leaving the facility will be further packaged in a sealed and secure, plain container and labeled with a shipping label generated by the inventory management system. The transportation process is described in detail in Section 2D Transport of Medical Marijuana.

The GM and Inventory Manager are responsible for packaging and labeling operations and for developing, implementing, and maintaining storage area procedures to ensure that there are no product mix-ups or undocumented inventory transfers.

Packaging Process and Materials

Our SOPs require inspection and testing of all incoming materials including packaging. All packaging sourced by the Company will be:

- Child resistant
- Tamper proof or tamper evident
- Plain, opaque, and light resistant
- Designed to minimize oxygen exposure
- Be re-sealable
- Certified compliant with the Poison Prevention Act of 1970 (for pre-packaged retail units of medical marijuana)
- Designed to protect the contents from contamination
- Non-reactive and non-toxic to package contents

Written procedures for the receipt, storage, handling, sampling, visual examination, and testing of all packaging components will be maintained by the GM and COO. Any packaging components that do not meet specifications upon receipt will be rejected, separated from approved inventory, marked as unusable and scheduled for return or destruction. Only food grade or pharmaceutical grade packaging materials will be used at any time during the cultivation and distribution process.

Quantities Packaged

The GM and COO will determine the quantity of medical marijuana products to be scheduled for packaging based on customer order demand or to establish and maintain inventory levels. Maximum container contents will be reasonable, be in compliance with dispensary package size limits and reflect market demand.

Equipment Use Restrictions

The use of equipment in the packaging operation is limited to responsible, trained employees familiar with any potential hazards of the operation as determined by the manufacturing manager.

RECEIVING, INSPECTION AND RELEASE OF LABEL MATERIALS

Our SOPs require inspection of all incoming labeling components and meet FDA quality system requirements for compliance with cGMP labeling standards. The Compliance Officer and COO will verify that all labeling used meets all MMCP regulations and current Good Manufacturing Practice (“GMP”) standards with respect to legibility, adhesion, etc. and that labeling operations are tightly. Each incoming shipment of labels and labeling will be inspected based on a set of predetermined criteria.

Storage of all printed packaging and labeling materials, including preprinted containers, packaging materials, safety inserts, and stickers (if applicable) in an area and manner suitable to prevent mix-ups. If necessary, product labeling will be color coded based on package size and potency to prevent mix-ups. The labels and labeling used for each batch will be documented in the Company’s packaging logs. Labeling tasks are restricted to trained, competent employees.

Receiving Log for Incoming Labels and Labeling

Upon the receipt of each shipment of labels and labeling from the outside printing company, the Company’s receiving log will be updated to document all necessary information including, but not limited to:

- Date of receipt
- Employee responsible for receiving
- Batch or Lot Number (assigned by the printer or internally by the Company)
- Quantity of labels received
- Total labels inspected (the representative sample lot)

Pre-printed labels will be check for accuracy, verifying (as needed):

- The Company’s name, license number and contact information
- Registered strain or product name
- The product identifier
- Warning Statement(s): The product is for medicinal use only. Not for resale or transfer to another person. This product may cause impairment and may be habit forming. This product may be unlawful outside the state of Ohio
- Any other information required by MMCP regulations

All pre-printed labels will leave sufficient space for lot specific information (the variable information panel) including, but not limited to:

- The date of harvest
- The date of laboratory testing
- The date of packaging
- Chemical/potency profile reported by the independent testing laboratory, expressed as content by weight
- The expiration date (no more than one year later than the date of harvest)
- The net weight in grams

Design and Information Required for the Primary and Secondary Container Label

Every batch of medical marijuana packaged will be affixed with a product label. The Quality Assurance Director will ensure that all product labels are compliant and accurate prior to use in any labeling operation. Each product label for pre-packaged units will be applied by trained employees, be easily readable, firmly affixed, made of weather resistant and tamper-resistant materials, and be conspicuously placed on the package. Space on container will be left for the recipient to attach additional labeling.

The immediate product container label will be inspected to assure that the label does not bear:

- Any false or misleading statements
- Any depictions of the product, cartoons or images not allowed by regulation
- Any information that violates 3796:5-7-01(F)

Label Creation, Inspection, Integrity, Process, Storage, and Change Control

Creation

The Quality Assurance Director will draft all text and design for the product labeling including primary and secondary containers and information safety inserts based on specific criteria as required by the MMCP. Additionally, the insert will contain information regarding proper handling, child proof closures, detection of tampering, warnings, precautions, contraindications, storage, instructions for use, and a how supplied section. A master insert text copy will be reviewed and approved prior to release to the printer. Each original master text version will have an edition date which will be critical for change control and provides assurance that the most current version is always in use.

Inspection

Upon return from the printer, a sample from the shipment will be 100% reviewed for accuracy as required by our SOPs. The labels will be reviewed, proofread, and verified for all data compliance points. Prior to inspection, new labels and labeling will be held in quarantine, separated from the approved inventory, until they are proofread. Acceptance or rejection of the labels and labeling will be documented. Acceptable labeling is approved and released from quarantine. Any rejected labels or labeling will be documented and destroyed.

Integrity

All labels and labeling will be designed and applied to the product container such that they will remain in place. All labels and labeling should be legible, and affixed to the product container such that no text is obliterated.

Process Control

- All labeling and packaging operations will be performed as separate functions to prevent mix-up between similar products or labels. Additionally, labeling and packaging operations will be executed at different times for different products.
- Prior to commencing a labeling run, and in order to prevent mix-up, the packaging area and packaging equipment will be thoroughly inspected for any labeling materials remaining from a previous packaging run.
- The surrounding area, tables, packaging lines, printing machines, and other equipment will be cleared of labels, packaging, and other materials used in the prior packaging run.
- All labels and labeling used in the labeling operation will be documented, included the quantity of labels and labeling issued, used, and returned to inventory.
- Tight specifications for label reconciliation will be established by the Quality Assurance Director (“QAD”), utilizing actual historic data when available to determine acceptable variance limits.
- When label reconciliation falls outside allowable limits, the QAD will conduct an investigation of the batch and determine to the extent possible, the source of the discrepancy. The deviation will be documented with explanation, and approved or rejected.
- All rejected labeling will be return or disposed of and any unused labeling which was preprinted with lot number and expiration date will be disposed of.
- When labels are issued for a packaging run, labeling will be carefully examined to assure the text and contents comply with specifications per SOP requirements. This examination will include the control number, expiration date, and the presence of all other required information.
- Documentation of the inspection, including the date and the name of the employee performing the examination will be entered into the inventory management system.

Storage

All labels and labeling will be stored in a secured, limited access area. Separate and labeled areas will be designated for newly received labels and labeling awaiting inspection and release. Once the labels and labeling are inspected and released by the QAD, they will be moved into released label inventory and stored by product type. Rejected or outdated labels and labeling will be stored in a separate area for inventory scheduled for destruction.

Change Control

Any changes to labels or labeling may be made from time to time as required, if the MMCP issues new labeling text requirements or the grower/processor or dispensary quality assurance request changes or updates to text. These changes will be formally reviewed and authorized by quality assurance before implementation. Any significant changes made to the design or text of any labeling, must first receive prior written approval from the MMCP. All new label proofs will be reviewed and approved by QA and the COO. At that point, depending on the nature of the change, current labels and labeling may be allowed to use until inventories are depleted. If the nature of the change is critical or the MMCP has ordered immediate implementation of the requested change, then any existing labeling inventory must be immediately obsoleted, removed from approved inventory, and scheduled for destruction.

Advertising (Including Inserts and Package and Label Statements)

All advertising, promotion, or marketing materials for medical marijuana will consistent with the Federal regulations governing prescription drug advertising and marketing per 21CFR202.1. The SOP which details labeling and advertising materials incorporates the full text of this regulation. If the company chooses to develop printed materials for advertising, they will be submitted for approval by the MMCP prior to use as required.

Shipment Packaging and Labeling

The Inventory Manager will ensure all packages contained in a shipment is appropriately labeled in compliance with MMCP regulations. Shipping labels will be conspicuously placed on the package, be weather-resistant and tamper-resistant and at a minimum, will include: the date and time of packaging; the name of the employee who prepared and sealed the package; the Company's license number, name, address and contact information; the shipment identification number; a description, including the weight, of each item contained in the package; and the name, address and contact information of the recipient.

PART II: PRODUCTION CONTROL

OVERVIEW

The Company will attain and comply with third-party certification standards for pesticide-free and sustainable medical marijuana agriculture. Sustainable agriculture is the production of food, fiber or other plant or animal products that uses farming techniques that protect the environment, public health, human communities, and animal welfare. We believe that responsibly and carefully cultivated medical marijuana that eliminates that use of chemical pesticides results in the best quality medicine for patients.

The Company's cultivation methods have been certified by the only nationally recognized third-party certification for medical marijuana. The program is currently certifying cannabis farms, processors, dispensaries and retail outlets in California, Colorado, Nevada, Oregon and Washington. We are proud to propose this high level of agricultural standards to Ohio.

Modeled on national and international sustainability, organic and biodynamic program standards, the certification program requires on-site inspections and third-party lab testing. Much like third-party certifications for traditional agricultural products, the whole life cycle of the plant is considered, from seed selection to harvesting and processing. In addition, soil, nutrients, pesticide use, mold treatment and dust control are analyzed. The certification also goes further than the USDA organic in some areas, requiring every operator to undergo pesticide testing every year, rather than only a small percentage of farms. Additionally, each cannabis operation must put into place a carbon footprint reduction plan, water conservation measures and fair labor practices.

PESTICIDE USE

The will meet and exceed the MMCP's regulatory safety standards for the use of pesticides. The company will only employ the use of pesticides, fungicides or herbicides (herein referred to collectively as "pesticides") that have been approved by both the MMCP and our third-party certifier. The Compliance Manager will oversee all products sourced for use in cultivation.

Integrated Pest Management Protocols

The goal of Integrated Pest Management (“IPM”) is to apply a combination of control methods to prevent, reduce, or maintain pest populations at non-damaging levels. Our IPM program employs non-chemical and mechanical pest management techniques. The following items will be considered by the Cultivation Manager when overseeing our IPM program:

- Current status of infestation;
- Regulatory considerations;
- Public perception;
- Pest and crop life-cycle stage;
- Location;
- Size;
- Density;
- Potential to spread;
- Environmental impacts;
- Previous results of measures; and
- Measurability.

A summary of pest identification, prevention and treatments are explained below.

- Organic pesticides will only be used as a last resort.
- The Cultivation Manager will implement and monitor IPM practices to predict potential levels of crop damage, mitigate risk and control pests.
- Early identification of pest infections is crucial. Each cultivation employee will be trained on and responsible for plant inspection and crop scouting.
- A variety of mechanical, physical and biological controls will be implemented.

The Cultivation Manager will oversee the IPM program. Regular IPM practices performed by the Company include, but are not limited to:

- Daily monitoring of pest populations
- Removal of pest habitat, food sources, and breeding areas
- Utilization of verified “pest-free” supplies
- Prevention of access to handling facilities
- Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction
- Disposition of infected crops
- Evaluation of the cost or prevention in relation to yield and quality improvements

Beneficial Biologicals

The Cultivation Manager may implement the use of appropriate biological controls including predatory wasps, mites, nematodes, lacewings, ladybugs, pirate bugs, and others for preventative or mitigation purposes. The use of biologicals will be limited to recognized and effective applications and only as a last resort to prevent contamination of the medical marijuana by the insects. The release of biologicals will be into the cultivation area between 60°F and 80°F, death of biologicals will occur at 100°F. Releases of predatory mites may be localized, en masse, or through row augmentation using edge effect

near entries to various rooms. Use of biologicals should be limited to recognized and effective applications.

Daily IPM Checklist for Cultivation Employees

Cultivation and Monitoring

- Quarantine all new plant material entering the cultivation facility for ten days to two weeks.
- Document pest populations, record outbreaks, treatment methods, and results.
- Monitor propagation areas daily.
- Utilize pest monitoring traps. Record and review the quantity of pest and beneficial insects weekly.
- Do not reuse media including fiber, soil, perlite or hydroton unless it has been sterilized in a procedure implemented by the Cultivation Manager.
- Complete all required checklists and logs daily.

Facility Maintenance

- Keep cultivation areas clean, dry, and free of algae and other clutter and trash. Remove pots of unwanted media from cultivation areas immediately.
- Maintain cracks, window and doorframes, drain areas, and floor joints with sealant to limit pest movement.
- Eradicate any weeds or pest habitats surrounding the cultivation facility.
- Use appropriate traps and baits on a regular basis and replace as needed.
- Maintain roads near the cultivation facility so they are free of trash and debris that border the road. Irrigate dirt roads to reduce dust and use slow speeds. Overhead irrigation will decrease dust and disrupt the behavior of mite populations.

Biologicals and Crop Treatments

- Release biologicals in accordance with instructions.
- To the greatest extent possible, avoid disruption of biological controls when utilizing organic pesticides.
- Do not apply any chemical substance (organic or otherwise) to the crop in the final three weeks of the flowering cycle.
- Turn off air circulation and ensure the ambient temperature is between 59 and 77°F. Do not apply foliar water immediately after applying crop applications.
- Adhere to any Restricted Entry Intervals (REI). Place a notice on all points of egress with name of the substance applied and the allowed time of entry.
- All cultivation employees must receive basic Worker Protection Standard training. Training must include recognizing the signs of chemical poisoning.
- Purchase on demand and use biologicals and treatments as soon as possible. Avoid unnecessary storage.
- Store all crop application products grouped by type in designated areas separated from water sources, maintenance chemicals, nutrients, or supplies in a dry, well-ventilated area.
- Dispose of all applications in accordance with label instructions. Generally, liquid containers must be triple rinsed and punctured before discarding.

Fertilizers and Other Crop Applications

All crop applications, including foliage sprays, nutrients, and other crop applications will be documented in detail to record each substance used as a production or handling input, including:

- Date and time applied
- Crop ID from the inventory management system/Information that identifies which plants received the application
- U.S. Environmental Protection Agency registration number (when applicable)
- Analysis of fertilizer
- Cultivation stage
- Date the plants were moved to the flowering stage of cultivation (when applicable)
- Application site
- Name of product applied
- Amount applied
- Size of application area
- Name of person applying

Spray and Feeding Protocols

All crop applications will follow established spraying and feeding protocols established by the Cultivation Manager. Each cultivation employee must review the spraying and feed protocols daily and complete all required documentation. Each employee is responsible for following the established protocol unless otherwise directed by the Cultivation Manager.

Independent Testing

The Company will engage with an independent testing laboratory licensed by the MMCP. All batches will be analyzed in accordance with MMCP rules. No medical marijuana will be distributed without passing all required assays. The QAD is responsible for oversight of all testing activities and the Company's contracts with laboratory facilities. Our QA/QC consultant will establish ring testing procedures with the independent laboratory. This allows the Company to calibrate our internal R&D laboratory equipment to the independent laboratory so that we accurately assess the results of our breeding projects, etc.

PART III: INVENTORY CONTROL

OVERVIEW

The Company understands that inventory handling is one of the most critical components in running a successful and fully-compliant medical marijuana business. Inventory management is required throughout the business. Without tight inventory control, there is a risk of security breaches, diversion, loss of quality, theft, and lack of accountability by the company's employees. Our inventory control plan is designed to ensure safekeeping of medical marijuana throughout the lifecycle of the product. This plan meets or exceeds all regulations.

The foundation of the inventory control plan will be the inventory management system approved by the MMCP. The Company will use this platform to track every action performed on every plant from its propagation (whether from seed or clone) to finished medical marijuana product, every movement of the

inventory and every wholesale and retail transaction, capturing batch and lot numbers throughout and ensuring the security and traceability of all inventory at all times. This all-encompassing process is commonly referred to as “seed to sale” tracking.

The Company will use secure cloud-based storage and back-up for inventory tracking. This offers an added layer of security and redundancy should there be a failure on a hardware device or an interruption in power. Cellular connections ensure that communication is intact if the internet connection is lost. Users log in with unique identification linked to specific roles and permissions within the software. This ensures accountability for and oversight of the business activities which can be monitored by upper management, owners and the MMCP at any time, from anywhere. Every piece of data is captured irrevocably and permanently and cannot be deleted, ensuring that there is no possibility of manipulation and the data is true and accurate.

The reporting engine within inventory management system will be utilized to provide key information to management including inventory-level planning, cost tracking, in-depth sales analysis, vendor purchase orders, inventory analysis, patient/order history, employee's productivity and compliance reporting.

Inventory Management Protocols

The Company's inventory management policies and procedures ensure product security and efficient operations. The COO and Inventory Manager are assigned responsibility for oversight of all inventory management activities and for implementing and enforcing the policies and procedures. The Company's cumulative inventory of usable medical marijuana and medical marijuana products will be set to reflect the actual and projected needs of patients so that excess inventory is not produced leading to storage and security issues.

The inventory management system will be accurate and capable of producing, upon request, reports on all medical marijuana in production, in storage, in route and distributed. A cycle count inventory method will be used throughout the organization, all inventory procedures will be fully documented and records maintained for no less than five years. Any discrepancies identified during inventory, medical marijuana diversion, theft, loss and any criminal action involving the Company or an employee will be reported to the COO. The COO will then report any verifiable incident of theft or loss of medical marijuana to the MMCP and local law enforcement, as required.

Reconciliation

A reconciliation of all inventory items is performed by a Level I Key employee on a regular basis, digitally and by hand. Any discrepancy in physical item inventory versus last recorded item inventory is documented and reported to the COO and handled in accordance with regulations. After further investigation, any appropriate corrective measures are taken. Inventory that is stored in the secure area is inventoried weekly. Inventory on the facility floor is inventoried daily.

Recalls

When a product recall is needed, the inventory management system will be used to track the chain of custody for all inventory items. All products resulting from the recalled batch will be identified for recall. If a full batch recall is needed, reports will be generated from the inventory management system to identify every distribution of a unit from the defective batch. The QAD is responsible for determining if a full batch recall is needed and will notify the appropriate regulatory agencies.

Destruction and Disposal

Medical marijuana that does not meet our standards is immediately handled in accordance with waste policies and procedures. This includes expired and damaged medical marijuana. The inventory that is unsellable will be stored in a separate limited access area from where the sellable inventory is stored. Only a limited number of authorized employees are authorized to be in the areas where damaged or otherwise unsellable medical marijuana is stored.

Tracking Plant Batches

Upon creation, groups of plants propagated together and of the same strain will be identified as a batch. A batch is defined as cannabis of the same strain that was grown and harvested at the same time. Batches of plants are kept together in the same physical location and are treated identically throughout their lifecycle, including their stage in cultivation, crop applications, soil additives and labor processes. This data is captured in the Company's crop application logs and tracked through the entire growth process. Details such as genetic line, plant health, growth rate, cost of equipment used in each growth phase and the cost of nutrients and additives applied throughout all stages of growth are also tracked.

Tracking of Plants

Actions performed on plants are tracked by scanning individual plants or scanning entire batches of plants and recording the action taken. This might include watering, feeding, plant movement from one physical location to another, plant destruction due to plant sickness or pest infestation, plant progression through different stages of cultivation, transplantation to different size pots, changes in light cycles, changes in nutrient, etc.

Plant Inventories

An inventory of all plants is performed by a Level 1 key employee on a daily or weekly basis. Batches of plants are inventoried by scanning barcodes of each plant, at which point the inventory management system can compare current physical plant inventory versus last recorded (expected) plant inventory. Plants that have reached 18 inches in height will additionally be tagged with a standard bar code tag and RFID tag, which allows scanning that directly inventories each plant by location and records all information on each plant in the inventory management system. The implementation of unique batch identifiers, RFID and barcodes allows for batch tracking from "seed to sale." In the propagation phase, this takes into account any plants that have been added to inventory, which in this phase would be by creation from seedling or clone, any plants that were removed from inventory or moved to another phase of its lifecycle and any plants that have been destroyed. Any discrepancy in physical plant inventory is traced to the source of the discrepancy, documented and reported to the COO and as MMCP regulations require. After further investigation, any appropriate corrective measures are taken.

Propagation Phase

Each plant will be assigned a unique identifying number after removal from a starter tray. Plants can be created by germinating a seed or by taking a cutting from an existing plant (cloning). From that point forward, everything that happens to the plant during its lifetime is recorded, including genetic history and mother plant (the plant from which the cuttings are taken), strain (type/name), schedule (including creation date and forecasted time until another change occurs in the lifecycle), watering and light cycles, nutrient application, employee ID (at each step) and physical location of the plant at all times. At this

point, all of the items that are taken into inventory and entered in the system can be tracked throughout the facility and beyond if necessary.

Vegetation Phase

When clones or seedlings have grown roots and are deemed hearty enough to be potted into individual pots, they are moved into the vegetative phase. In this phase, the plant is usually replanted into sequentially larger pots to encourage the root systems to grow and expand as the plant matures. Each time an employee works with the plants; the actions are recorded in the inventory management system. Key areas that are recorded include a schedule (including when the plants were received in this phase of the lifecycle and any replanting needed), watering and light cycles, nutrient application, employee ID (at each step) and physical location of the plant at all times. This information is added to the records created in the previous phase.

Flowering Phase

When the plant has grown to its desired size, it is moved to the flowering phase of the lifecycle. This phase requires a different light schedule, flushing of any nutrients used and added scrutiny in managing the health of the plant as any stress, exposure to pests or environmental factors, like mold and mildew can ruin the crop. Each time an employee works with the plants; the actions are recorded in the crop application log. Key areas that are recorded include a schedule (including when the plants were received in this phase of the lifecycle), watering and light cycles, anticipated harvest date, employee identification (at each step) and physical location of the plant at all times. This information is added to the records created in the previous phase.

Harvest Phase

Once a batch has reached the end of its flowering phase, it is harvested. The inventory management system will record all harvesting activities. Each batch of plants is harvested at the same time, beginning the harvest process. During the harvest phase, several data elements, such as the plant weight at different phases of the harvest, final weight, strain, product type and test results of the harvested product are captured and recorded. Integrated National Type Evaluation Program (NTEP) certified legal-for-trade scales, accurate to the hundredth of a gram, send weight measurements directly to the inventory management system eliminating user error and providing accountability for the harvest process.

During the harvest process, the plant material is separated into flower, the usable byproduct (trim) and waste. The flowers are separated to be dried, trimmed and cured in a secure area. Usable byproduct may also be dried or processed while fresh. The inventory management system is used to follow the plant material as it moves through this process, including the secure storage of the plant material in between stages.

Creating Bulk Inventory Entries

In this phase of the lifecycle, the plant batches are changed from a living plant count inventory (where the plant is the unit) to bulk inventory, which is tracked by weight. This gives our management team accurate yield information, a key insight into the cost of cultivation for each batch and the ability to forecast accurate yields for future batches. Key areas that are recorded include initial harvest (wet) weight, weight after separation into flower, byproduct, and waste, weight after trimming, employee identification (at each step) and physical location of the plant material at all times. This information is added to the records created in the previous phase.

Distribution

Transportation Manifests

Before moving packages from the packaging area to another physical location, a distribution document is created in the inventory management system. This distribution document is required for all movements of packages, whether from the cultivation operation to the dispensary or processing facility, from the processing facility to the dispensary or from the cultivation operation to another licensed entity as a wholesale sale. The distribution document records the current location and status of the packages, such as "in-transit" or "received." the inventory management system also creates a transport manifest, compliant with any MMCP regulations, for the package distribution.

The manifest contains details such as time of departure, time of arrival, product description and product weight, the route to be traveled origin and destination addresses, vehicle and employees identification.

This document can be e-mailed, printed or produced virtually, on a mobile device such as a tablet, from within the inventory management system. Each distribution of packages has a physical copy of the manifest with it at all times.

Delivery of Inventory

Once the inventory reaches its destination, it is checked in by a manager at the receiving location. the inventory management system's purchase order reporting then reconciles the labeled or expected, package weights with the actual weight received during intake. Any discrepancy in weight or package count is identified by the receiving manager and reported back to our Inventory Manager. Discrepancies are documented and reported to the Compliance Officer and COO and as regulations require. After further investigation, any appropriate corrective measures are taken.

Record Keeping

The Company will maintain inventory data in its electronic tracking system that will include an accounting of and an identifying tracking number for the number, weight and type of seeds; the number of immature medical marijuana plants; the number of medical marijuana plants; the number of medical marijuana products ready for sale; and the number of damaged, defective, expired or contaminated seeds, immature medical marijuana plants, medical marijuana plants and medical marijuana products awaiting disposal. The COO and Inventory Manager will oversee inventory controls and procedures to conduct inventory reviews and comprehensive inventories at its facility. Inventory reviews of medical marijuana plants in the process of growing and medical marijuana that are being stored for future sale will be conducted monthly. Comprehensive inventories of seeds, immature medical marijuana plants, medical marijuana plants, medical marijuana and medical marijuana products will be conducted at least annually.

A written or electronic record will be created and maintained of each inventory conducted under that includes the date of the inventory, a summary of the inventory findings, and the employee identification numbers and titles or positions of the individuals who conducted the inventory. All containers or group of containers for components and medical marijuana is identified with a distinctive code for each lot in the shipment received. The code must be used in all transactions pertaining to the lot including processing, sales, transfers, disposals or any other transaction impacting quantities recorded for the lot. Each lot must be properly identified both with container labeling and in the inventory management system as to the lot's status as quarantined, approved or rejected.

Inventory Auditing and Reporting

Daily reporting enables management to track productivity levels of employees involved in the harvest process and identifies any discrepancies or out of specification reporting. The inventory management system will report on the harvest process provide total weight harvested and trimmed at each weigh point and compares that to final weight post-trim, including waste. This ensures that any discrepancy in weight is reviewed by a Level 1 key manager. Discrepancies are traced to the source, documented and reported to the COO and Compliance Officer and as MMCP regulations require. After further investigation, any appropriate corrective measures are taken. This not only ensures that employees produce a final quality product in an efficient and timely manner, but also that inventory is not diverted as it is manicured and categorized.

The Company will create weekly inventory reports that provide at a minimum:

- Total plant count that includes all stages of cultivation, organized by grow room
- Batch number, weight and strain of each batch released from quarantine and ready for sale
- Total number of plants and unique identifier for each plant harvested but not yet assigned to a batch
- The amount of medical marijuana sold since the previous inventory and include:
 - Date of sale
 - License number of purchasing processor or dispensary
 - Batch number, registered product name and quantity sold
- Date, quantity, and method of disposal (when applicable)
- Summary of inventory findings
- Name, title, and signature of employees conducting and overseeing the inventory

The Inventory Manager (a type 1 key employee) will conduct a manual, physical inventory of medical marijuana on hand annually and compare the findings to an annual inventory report generated by the inventory management system. Any discrepancies not accounted for through moisture loss or handling will be reported by the COO in accordance with 3796:5-4-01.

Beyond this, the system also provides additional identifying information for the purpose of recalls. This includes the lot number, date of harvest, date of final testing, date of packaging, cannabinoid profile and potency levels, terpenoid profile, expiration date, if applicable and quantity, volume or weight of contents in the package.

In-Process Plants

The Inventory Manager will enforce inventory procedures for in-process medical marijuana. This includes plants in quarantine pre-harvest, manufacturing batches holding overnight and other similar procedures. Any cannabis that is not stored in areas for finished product must be secure at all times and maintained in a manner consistent with MMCP regulations.

Processing/Final Trim

In this stage, the finished plant material is prepared for testing, storage and eventual distribution to a processor or dispensary. Employees will process the dried and cured flowers for packaging and the byproduct (trim) for manufacturing into extractions, infusions or edibles. Key areas that are tracked include weight after drying/curing, weight after trimming, weight after the material is placed in containers for transfers or storage, employee identification (at each step), any item removed for testing

purposes and physical location of the plant material at all times. This information is added to the records created in the previous phase.

Finished Packages

The finished packages, if not immediately distributed, are secured in a safe in the packaging area and reconciled on a daily or weekly basis by a Level 1 key employee. The reconciliation includes not only a physical count of the packages but also an inspection of the packaging material, labeling and weight of a random sample of packages. The inventory management system provides reconciliation tools to report on both the physical number of packages and the gross package weight of each, enabling spot checks on weight to be performed without damaging the sealed packaging. Reporting at this point tracks expected parameters around shrinkage and identifies weight variances outside of the normal shrinkage expectations. If any discrepancy in weight or package count is identified, discrepancies are immediately documented and reported to the Compliance Officer and as regulations require. After further investigation, any appropriate corrective measures are taken.

Employees put each unit into approved packaging for distribution. Once they are packaged, barcoded labels containing all necessary regulatory compliance information is printed directly from the inventory management system and affixed to each item. Information on the label will include items such as the Company's license number, test results from an independent testing lab, ingredient and nutrient list, package weight and packaged and expiration dates. The Inventory Manager is responsible for ensuring each inventory item is barcoded and prepared for distribution. Items will be sorted by type and batch and distributed on a First-in, first-out (FIFO) basis.

Electronic Inventory Management System

The Company will install the inventory management system approved by MMCP. There are also internal requirements for recordkeeping. Our internal reporting requirements provide that the system must maintain the following records or the COO will implement additional systems as needed.

- A "total inventory in storage" by location and batch report that records user, date, time, item, quantity and storage access in chronological order must be kept. An "all events" report that provides detail on all user activity and transaction types within a time frame and tailored to specific data requirements, such as individual items or users must be maintained.
- A "controlled substances vault compare" report that allows administrators to cross-reference the inventory that leaves the storage area and arrives at the shelf, dispensary or any other location to the inventory at that location will be produced. Transactions that do not match show up on this report by location, item, quantity, date, time and user.
- There will also be a "review send" report that provides detailed information regarding the removal of medical marijuana from the storage area, specifying the user, time, date, item, quantity and intended destination.
- Additionally, a "dispensing" report will be kept, that provides detailed information regarding the transaction of medical marijuana at the dispensary, indicating the user, time, date, item, quantity, and inventory movement at the dispensary. A "purchase history" report will also be maintained, to help trend the receipt of medical marijuana into inventory and monitor purchase patterns.
- A "proactive controlled substances diversion" report that isolates above-average distribution of controlled substances, as determined by standard deviation will also be required.

Inventory Counts

The COO Manager will oversee daily paper and electronic entry of all inventory transactions. Each day, the designated employee responsible for opening the facility will record beginning inventory. Ending inventory for each shift will also be logged. Each facility will maintain an inventory log to record the date of each inventory process, a summary of the inventory findings and the names, signatures and titles of the individuals who conducted the inventory.

Cycle Counts Required for Cultivation

1. Shift counts:
 - a. Plants propagated from seed or clone
 - b. Transplants during the shift
2. Daily counts:
 - a. Harvest records
 - b. Totals from above
3. Weekly counts:
 - a. Waste log reconciliation
 - b. Weekly propagation and harvest totals
4. Monthly counts:
 - a. Two employee count of all plants in production
 - b. Two employee count of all medical marijuana in storage
 - c. Manager reconciliation to the inventory management system
 - d. Administrative reconciliation of all transfer, sales and receipts
5. Quarterly counts:
 - a. Manager physical count of all inventory
 - b. Chief Executive Officer review of all discrepancies and reports
6. Annual counts:
 - a. Complete inventory of all inventory and assets
 - b. Inventory Manager reconciliation to the inventory management system

PART IV: DISPOSAL AND WASTE REMOVAL

OVERVIEW

The Company has developed comprehensive SOPs for the disposal of medical marijuana and chemical waste to ensure compliance with regulation and ordinance. These SOPs properly address all waste disposal requirements including the inventory management system entries required for any activity generating medical marijuana or chemical waste. The GM is responsible for oversight of all waste disposal activities and for implementing and enforcing the policies and procedures. The COO will ensure the inventory management system is accurate and capable of producing, upon request, reports on all medical marijuana stored, quarantined or disposed.

All waste, including waste composed of or containing medical marijuana, will be stored, secured and managed in accordance with MMCP regulations and all applicable ordinances and Department of Environment rules. Additional protocols include detailed SOPs for excess product disposal, laboratory, liquid and solid waste disposal based on local ordinances and the disposal of medical marijuana plants and expired, contaminated, or otherwise unusable medical marijuana.

Our operation will produce minimal medical marijuana waste. The COO and Compliance Officer are responsible for developing and implementing procedures for waste disposal in the production facility that are in compliance with regulations, state and local law. The GM is responsible for oversight of all waste management activities and for implementing and enforcing the policies and procedures at the facility. Our plan of operation includes procedures for the management and disposal of waste and will be made available to the MMCP for review on demand.

The Company has a comprehensive system for systematically collecting and properly destroying all waste materials containing medical marijuana. All waste composed of, or containing, finished medical marijuana will be stored, secured and managed in accordance with MMCP and regulations. The company will dispose of waste by composting on-site or via a waste removal company. The final material disposal will render both finished product and precursor materials completely unrecoverable.

Storage of medical marijuana waste occurs in limited access areas or a securely locked dumpster. Dumpsters and waste bins used must meet all MMCP regulations and when not in use must be kept locked. At limited access entries and exits in areas containing medical marijuana waste, video surveillance is present. Procedures for medical marijuana waste disposal will ensure that all waste is secured and inaccessible to the public.

All disposed waste will be recorded in the waste disposal log with information as to the date of disposal, the type and quantity of waste disposed of, the manner of disposal, the name of the employee logging the waste and the customer who returned the waste if applicable.

Federal, State, and Local Requirements

The Compliance Officer will oversee the waste management program's compliance with:

- Department of Environmental Protection regulations
- State and County environmental regulations for solid waste
- DEA Disposal of Controlled Substances regulations
- MMCP regulations
- All other applicable regulations.

WASTE DISPOSAL RECORDS

Disposal records must include the disposal method used for any medical marijuana that was cultivated or acquired but not sold, including evidence of the disposal of the medical marijuana in accordance with MMCP and internal waste disposal policies and procedures. Daily plant care operations also produce plant waste from pruning operations. Pruning waste is accumulated daily, weighed and recorded in the inventory management system on a daily basis and disposed of in accordance with our SOPs.

Types of Waste

- **Non-Medical Marijuana Waste:** Non-medical marijuana waste consists of chemical waste, sanitizers, fertilizer and other crop applications.
- **Plant Waste:** Plant waste is all plant material collected during the propagation, cultivation, harvesting and processing of medical marijuana plants in the cultivation phase. Plant waste is considered components of the plant that are discarded and not intended for sale to a dispensary.

Intermediate and finished medical marijuana product is not green plant waste and must be categorized into one of the other waste classifications below.

Waste Classification

All waste will be categorized into a classification:

- **Contaminated:** Medical Marijuana product can be contaminated in a variety of ways, including becoming exposed from its secure container, falling on the floor or if the storage container's tamper evident seal has been broken.
- **Expired:** The company's SOPs detail daily audits of inventory in all stages of production. The company will employ a first-in-first-out inventory method. However, any expired or degraded products are considered waste and will be disposed of in accordance with regulations and company protocols.
- **Damaged:** Medical Marijuana can become damaged if improperly stored due to temperature, moisture or other undesirable environmental elements. Medical Marijuana can also become damaged if the packaging and labeling is defective or illegible.
- **The General Manager, in coordination with the Quality Assurance Manager, ensures medical marijuana materials and extracted products subjected to improper storage conditions, natural disasters, fires, accidents or equipment failures, are not salvaged or distributed. Improper storage conditions include but are not limited to, conditions that expose products to extremes in temperature, humidity, smoke, fumes, pressure, age or radiation.**
- **Returned Products:** The company will accept unused, excess or contaminated medical marijuana from dispensaries or processors if authorized by the MMCP. Returned products may never be resold and must be disposed of properly.
- **Recalled Products:** The company will accept recalled medical marijuana from dispensaries if authorized by the MMCP. Recalled products may never be resold and must be disposed of properly. If products that are subject to recall have not been transported offsite, the recalled products will be gathered and stored for disposal.
- **Surplus and Unused:** Surplus and unused medical marijuana waste occurs when plant material is grown in excess of what is needed for demand.

Waste Log

All waste quarantined for disposal is recorded in the Company's waste log with detailed information including the date of disposal, the type and quantity (weight) disposed of, the manner of disposal, the reason for disposal, the name of the employee processing the disposal, the source of the waste and the waste hauler.

Inventory Management System

The inventory management system will track unusable medical marijuana (e.g., outdated, damaged, deteriorated, mislabeled or contaminated) and medical marijuana waste by weight and the barcode throughout every phase of production as well as returns and recalls in the retail phase. Upon destruction, the inventory management system should generate a destruction report. The system will also for the electronic authentication of the witnesses to the destruction through either a four-digit pin number or a biometric scan. The inventory management system does not simply delete the data related to the waste; rather, the system evidences the lifecycle of every original plant barcode with an auditable trail of either retail sale or verified destruction.

Expired and Disposed Medical Marijuana

The GM is responsible for maintaining standards in all storage areas. To prevent cross-contamination, the facility will be equipped with separate areas for storage of medical marijuana that is outdated, damaged, deteriorated, mislabeled or contaminated or whose containers, or packaging have been opened or breached, until such products are destroyed. This waste disposal quarantine area within the facility will contain any medical marijuana waste awaiting disposal. All holding areas are subject to SOPs requiring all security and sanitation protocols be followed in their entirety and properly documented. All medical marijuana held for disposal will be:

- Stored in a locked container.
- Stored in a secure area under surveillance.
- Recorded in the log and the inventory management system, when necessary.
- Disposed of in accordance with the company's waste disposal policies and procedures and regulations.

All storage areas will be maintained in a clean and orderly condition and will be located in a secure, locked and restricted area until it can be properly disposed.

Quarantine of Waste

All medical marijuana waste will be quarantined, placed in secured hazardous waste containers and removed from the premises to a secured area if permitted by MMCP. The QAD will implement measures to reduce waste resulting from our operations. In any event, all medical marijuana plant waste will be stored and disposed of in a manner that:

- Minimizes the development of odors.
- Minimizes the potential for waste to become a vector of disease.
- Minimizes the potential for waste to attract, harbor or become a breeding place for pests.
- Protects against contamination of in-process and finished medical marijuana, contact surfaces, water supplies and grounds surrounding the facility.
- Controls hazardous waste (such as paint or construction materials) to prevent contamination of medical marijuana, contact surfaces, water supplies and grounds surrounding the facility.
- Prevents diversion, theft or loss of unusable medical marijuana.
- Provides traceability through documentation, reporting, and electronic tracking.

WASTE DISPOSAL GUIDELINES

Each Level 1 key employee is responsible for ensuring the quality and safety of medical marijuana in their inventory on a daily basis. Adulterated medical marijuana products must be stored in a limited access area separate from unadulterated medical marijuana. All medical marijuana that is determined to be unsafe for human consumption for any of the above reasons will be rendered unusable and disposed of in accordance with the procedures detailed below.

Rendering Waste Unusable

Before commencing the waste disposal process, the Inventory Manager will assure that all pre-disposal reporting and recordkeeping requirements are satisfied. An employee will render waster unusable and unrecognizable in accordance with all applicable laws and regulations. A trained employee, under

management supervision, will render solid medical marijuana waste unusable by grinding and incorporating medical marijuana waste with other approved waste materials. The process will result in the waste being indistinguishable from non-medical marijuana waste and unusable for inhalation, ingestion, or injection. Medical Marijuana waste will be ground with either compostable mixed waste, which includes food waste, yard waste, vegetable based grease or oils or other MMCP-approved materials.

Waste Received from Customers

The company will accept returns, unused, excess or contaminated medical marijuana from customers if allowed by the MMCP and handle this waste in accordance with regulations while maintaining a written record in the waste disposal log and the inventory management system, which will include the name of the processor or dispensary when applicable.

Hazardous Waste

The Company's cultivation methods will not result in the generation of hazardous materials. If hazardous materials such as paint and building materials are used for construction, renovation, or other purposes, any hazardous waste materials will be quarantined from all other waste generated by the Company. Hazardous materials will be promptly disposed of in accordance with Federal and State law, rules and regulations related to hazardous waste, including sections 3001—3024 of the Resource Conservation and Recovery Act of 1976 (42 U.S.C.A. §§ 6921—6939g), the Solid Waste Management Act (35 P.S. §§ 6018.101—6018.1003) and regulations promulgated thereunder.

Procedures

All medical marijuana waste, including waste composed of or containing medical marijuana, will be securely stored until disposed. All waste will be recorded in the Company's waste disposal log including:

- A description of and reason for the disposal, including, if applicable, the quantity of unusable medical marijuana.
- The date of disposal.
- Confirmation the medical marijuana was rendered unusable before disposal
- The method of disposal.
- The name and license number of the employee(s) responsible for disposal.

Solid Waste

Prior to disposal, the Inventory Manager will assure that all pre-disposal reporting and recordkeeping requirements are satisfied. The Company will comply with local and MMCP approved methods of disposal utilizing on-site compost (preferred) or a properly licensed and permitted solid waste facility for final disposition.

With management approval and oversight, a cultivation employee will render solid medical marijuana waste ("green waste") unusable by grinding and incorporating medical marijuana waste with other approved materials. The resulting mixture must contain at least 50% non-medical marijuana waste by volume. Medical Marijuana plant waste may be ground with either compostable mixed waste (which includes food waste, yard waste, vegetable based grease or oils or other compostable waste materials) or

non-compostable mixed waste (which includes paper waste, cardboard, plastic, media or other approved non-compostable waste materials).

When appropriate, compostable mixed waste will be disposed of as feedstock or composted at licensed composting facility, which will be approved by the local health department and Department of Environmental Protection as needed. Non-compostable mixed waste will be disposed of or incinerated at a state licensed landfill or other facility approved by the local health department. The QAD will ensure all companies used hold a valid permit with the Department of Environmental Protection and are approved by MMCP.

No fewer than two employees must witness and document the disposal of medical marijuana or medical marijuana products in the Waste Disposal Log. All waste will remain in a locked waste container until pick-up.

Storage and Transport

All medical marijuana for disposal will be held under secured quarantine and stored until it can be properly destroyed. All medical marijuana transported by company employees will be transported in a locked and secure storage compartment via a transporting vehicle. All transport vehicles will follow company protocol including transport of medical marijuana waste.

Liquid Waste

All liquid waste runoff from cultivation crop applications will be 100% recycled, filtered, stored, reconditioned and re-entered into the irrigation system for crop production. The company will strive to recycle 100% of water runoff resulting from cultivation activities. Liquid waste containing nutrient residues, medical marijuana or by-products of medical marijuana processing will be disposed of in accordance with label instructions and with state requirements for discharge into surface water, groundwater and sewers or disposed of in an industrial wastewater holding tank.

The Cultivation Manager will implement policies to eliminate water waste and to recycle water whenever possible. The Compliance Officer in coordination with the Cultivation Manager must ensure that all chemical waste disposal is performed in accordance with the label directions and applicable ordinances.

Laboratory Waste

The Company's on-site R&D testing laboratory will dispose of flammable solvents as well as other waste streams with a certified laboratory waste disposal company. To dispose of any leftover medical marijuana that was not used in the sample analysis process, the lab staff will place that medical marijuana, products, and containers inside a waste disposal drum. The drum at the time of disposal will contain approximately 70% liquid lab waste (flammable solvents, etc.) and about 30% solid waste (containers, vials, plates).

All medical marijuana that is disposed of is rendered unrecognizable and unusable once inside the drum and saturated in a solvent. The waste disposal company will be the last person in the chain of custody as drums are incinerated or disposed of in accordance with state and local laboratory waste disposal guidelines.

A rigorous chain of custody will be maintained to ensure medical marijuana that has failed laboratory testing is not released for distribution. All products waiting for laboratory analysis are held in

quarantine. Upon notice of a failed batch, the QAD will oversee the disposal of the batch in the presence of one witness and under the surveillance of security cameras.

Security and Recordkeeping

Quarantined medical marijuana will be held in storage with full camera coverage until a manager removes the batch for disposal. All batches will be properly labeled for disposal and entered into the inventory management system with a disposed of status. The Inventory Manager will ensure the entire batch is properly recorded in the system as disposed.

Unauthorized Destruction

All employees will report the unauthorized destruction of medical marijuana as a condition of employment. A manager will report any verifiable incident to the COO to investigate the incident and determine the outcome. Unauthorized disposal of medical marijuana may be cause for termination.

PART V: ADVERSE EVENTS AND RECALL PROCEDURES

OVERVIEW

The Company's procedures for handling all complaints are fully detailed in our SOPs and review by our third-party Patient Focused Certification vendor. Our procedures section cover complaint classifications, management responsibilities and steps for investigation and resolution. Voluntary and mandatory recalls of cannabis are detailed with procedures for addressing customer complaints, returns and incidents requiring product withdrawal or recall.

Basis and Authority

The Food and Drug Administration (FDA) has established voluntary guidelines for conducting product recalls related to all foods. The product manufacturers or distributors carry out most recalls of products regulated by the FDA voluntarily. In some instances, a company discovers that one of its products is defective (adulterated or misbranded) and recalls it entirely on its own. In others, FDA informs a company of findings that one of its products is defective and suggests or requests a recall. FDA guidelines for companies to follow when recalling defective products under the Agency's jurisdiction are published in Title 21 of the Code of Federal Regulations. These guidelines make clear that FDA expects these firms to take full responsibility for product recalls, including follow-up checks to assure that recalls are successful. Under the guidelines, companies are expected to notify FDA when recalls are started, to make progress reports to FDA on recalls and to undertake recalls when asked to do so by the Agency.

Adverse Event Complaint Handling

All employees are responsible for documenting any adverse event complaint received from another employee, another cannabis establishment, a patient or any other party in the Company's Adverse Event Log, which will be maintained by the QAD. An employee may receive a complaint in person, by phone or email. The employee receiving the complaint will notify a manager immediately. All employees will be trained to handle complaints including verbal de-escalation techniques and investigative questioning.

All complaints will be categorized by a manager as an adverse event, product quality complaint or other complaint. Other complaints will include but are not limited to neighborhood-related issues, service related issues, employee-related issues or other operational related issues. A manager must respond to any complainant relating any issue other than product related issues within twenty-four hours. Our policy is to make a good faith effort to resolve any complaint, whether legitimate or frivolous whenever possible.

Investigation of a Product Complaint

Once notification of a product complaint or adverse event has been received, it is the responsibility of GM and QAD to begin accurate and detailed documentation and product tracking via the inventory management system. To conduct a thorough investigation into the complaint, the QAD will first determine the nature and potential causes of the problem and any other product(s) that will potentially be affected by inventory tracking features of the electronic the inventory management system. The QAD will enter all information into the Complaint Log and determine the appropriate action and document all actions taken.

Potential actions that could be taken would be Product Recall (a food safety or health risk due to physical, chemical, biological or immunological contamination), a Product Withdrawal (a quality related issue with the affected product(s) or No Corrective Actions may be taken, meaning it was an isolated incident with the affected product(s).

RECALL AND DISPOSAL PROCEDURES

The COO will implement and maintain a team responsible for executing a withdrawal or recall event. The team is responsible for coordinating all aspects of a withdrawal or product recall. A Recall Coordinator will be appointed by COO, who will assign a manager and establish a recall team. Together the team will assist the recall coordinator in the event of withdrawal or recall event in accordance with the procedures in this plan. All employees will ensure that all procedures are carried out effectively and efficiently.

The GM will ensure the team receives appropriate training utilizing mock withdrawal and recall procedures semi-annually so that they understand their responsibilities. The withdrawal and recall team list will be updated quarterly by the GM to ensure all names, contact phone numbers and responsibilities of employees and alternates are updated.

Withdrawal and Recall

All withdrawal and recall activities will be overseen by the COO. The withdrawal and recall team will be assembled by the GM, ensuring adequate resources are available for the severity of the issue.

The team will:

1. Gather all information collected in the tracking process.
2. Detain and segregate in the quarantined storage area, all products to be withdrawn or recalled which are in the control of the Company.
3. Adhere a "DO NOT DISTRIBUTE" sign on all containers storing affected products and complete the Withdrawal and Recall Log component of the Incident Log.
4. Securely send an electronic Notification of Recall to any party that received the affected product and follow up with all effected facilities via phone.

5. Notify the MMCP immediately.
6. Ensure the following information is accurately documented:
 - Name and batch number of the withdraw/recalled product(s).
 - Production date(s) of the withdraw/recalled product(s).
 - Reason for the withdrawal/recall.
 - Quantity of withdrawn/recalled product(s) distributed;
 - Quantity of withdrawn/recalled product(s) in inventory (for internal use only).
 - Area(s) of distribution and dispensaries affected (for internal use only).
 - Coordinate and monitor the recovery of all affected product(s).
7. All recalled products will be destroyed by the company in accordance with the waste disposal requirements set forth by the MMCP.
8. All recalled products sold to customers will be picked up from the recipient placed into storage in a limited access area separate from the regular inventory of the dispensary.
9. Conduct a reconciliation of the total quantity of recalled product and affected product in cultivation center the inventory management system and destroyed by the dispensary against the total quantity produced.
10. Allow collection of random samples of recalled product(s) by an independent laboratory for testing as appropriate.
11. Collect testing results and discuss the results and corrective actions that will be required with the MMCP.

Disposal

All recalled or withdrawn products in the Company's inventory will be disposed of in accordance with the company's waste SOPs upon completion of the investigation. Recalled and withdrawn products will be stored in a separate limited area from the regular inventory of the facility prior to destruction. The COO will assure that all security, storage, recordkeeping, reporting, and disposal procedure requirements pertaining to the disposal of cannabis waste are fulfilled.

Training and Mock Withdrawal and Recall Drills

The GM will implement all necessary withdrawal and recall training for all employees including mock recalls. Mock recalls are regularly used to determine whether the withdrawal and recall procedure is capable of identifying and quickly controlling a batch of potentially affected product and reconciling the quantities produced, quantities in inventory and quantities distributed. A mock withdrawal or recall will identify potential problems and allow employees to become familiar with recall procedures. If problems are identified in the procedures, they will be corrected by the Managers and employees will be retrained on new procedures.

PART VI: RECORD KEEPING AND REGULATORY COMPLIANCE

RECORD KEEPING

The Company has adopted procedures for maintaining records that conform to medical marijuana regulations and best practice for the medical marijuana and pharmaceutical sectors. Our SOPs provide detailed descriptions of plans, procedures and systems adopted and maintained for tracking, record keeping, record retention and surveillance systems, relating to all medical marijuana at every stage

including cultivating, possession of medical marijuana, delivery, transporting, distributing, sale and dispensing by the proposed licensed organization and will maintain records required for a period of five years and make these records available to the MMCP upon request.

In addition to regulatory requirements, the Company has a responsibility to our stakeholders to accurately document the activities of the business. True and correct records maintained in a timely and organized manner also provides real-time operating information to management necessary to make quick and informed decisions in the normal course of business. We maintain strict control over records to maintain regulatory compliance and to provide operating data to management, information to consultants, document operations for third-party certifiers or auditors and to keep a record of operations in case of any insurance claims, legal or administrative investigation.

The Company is committed to compliance with all laws and regulations. Management will make all records available to the MMCP or its authorized representatives upon request for monitoring, on-site inspection, and audit purposes.

Procedures

The COO is responsible for recordkeeping, data retention and back-ups to ensure the Company maintains true, complete and accurate records. The COO is also responsible for the proper integration of those requirements into policies and procedures. Back-ups of all records must be maintained for a recommended of five years. All employees must adhere to recordkeeping policies and procedures related to their job duties as a condition of employment. The COO must authorize the release of any records to a third-party and must report the disclosure of records to the CEO to determine if legal counsel should be notified.

The Company will maintain, at a minimum, the following categories of records:

1. Standard operating procedures
2. Inventory records including seed to sale tracking
3. Confidential customer, except information that may not be retained as stipulated by § 1161.23(d) of the regulations
4. Distribution records
5. Adverse event reporting and recalls
6. Employee records
7. Waste disposal records
8. Maintenance records
9. Fixed asset schedules
10. Insurance and escrow requirements
11. All monetary transactions
12. Books of accounts including journals, ledgers and supporting documents, agreements, checks, invoices, vouchers, monthly and quarterly reports and annual audits
13. All licensing documentation and other correspondence with the MMCP and all other corporate documents required by law including but not limited to meeting minutes, annual reports, stock or membership agreements.

Records Loss

Any loss or unauthorized alteration of company records discovered or suspected by any employee will be reported to the GM or COO immediately. The COO will report such incidents to the MMCP and law enforcement as necessary. Upon discovery of a records security breach, the COO and IT Director will review all recordkeeping and security policies to identify deficiencies and necessary corrective measures. The Company will engage the services of a third-party data security expert as needed.

Records Maintenance

All paper logs and electronic records will be maintained for a minimum of five years or as otherwise prescribed by regulation. In the event the company no longer ceases to exist, the CEO will cause the records to be maintained by a legal representative. It is our policy to retain records in perpetuity unless a member of senior management determines the electronic record should be deleted or destroyed. Only the CEO may authorize the destruction of records.

REGULATORY COMPLIANCE

Compliance Officer

The Company will retain on staff a full-time Compliance Officer at all times to oversee all ongoing activities related to the development, implementation, and maintenance of, and adherence to the company's policies and procedures for compliance with state laws and MMCP regulations. The Compliance Officer will report directly to the Chief Financial Officer to separate the position from the CEO and COO who will be in the facility day-to-day. The Compliance Officer will be an independent position available to consult on and support the compliance policies of the company and assure that these policies remain current with legislative and regulatory changes. The Compliance Officer will also be expected to review, comment, and provide sound interpretation of federal, state, and local law and regulation so as to assure the Company remains in compliance at all times. This position will be filled locally and requires someone with a legal or regulatory background and preferably in a highly-regulated industry such as health care. The individual must be able to gain a thorough and complete working knowledge of Ohio laws and regulations that relate to medical marijuana and be able to provide training to employees.

Manager Reviews

Managers will perform scheduled reviews of all operating activities to ensure compliance with company policies and MMCP regulations and directives. The Compliance Officer will oversee the manager level reviews and will also perform scheduled and random audits with a specific focus on activities related to worker and product safety and security, transportation activities, recordkeeping and reporting. Compliance audits will include an examination of video recordings, data systems and paper records, as well as employee and contractor interviews.

Internal Audits

The COO and Compliance Officer are responsible for the implementation and maintenance of an ongoing internal audit program featuring both unannounced and random, as well as regularly scheduled audits. Electronic data, paper records, CCTV recordings and employee interviews will be used to review employee performance in relation to our policies and procedures and MMCP regulations.

Corrective Measures

Detailed protocols for corrective measures will be followed for any findings of noncompliance. Any identification of non-compliant activities will require thorough investigation by the Compliance Officer. The Compliance Officer will create and supervise a plan of action approved by the CEO. The plan of action will be developed to correct any systemic issues that lead the finding of non-compliance and may require an SOP revision, employee training or re-training, re-assignment of responsibilities or any other action the Compliance Officer and CEO deem necessary.

Third-Party Inspections

All areas of the facility, all employees and contractors, records and activities, including video recordings will be subject to inspections by the MMCP and other government authorities. The Company will provide representatives of the MMCP, emergency responders, authorized law enforcement personnel, public health officials and other government officers acting in their official capacity access to its facilities and records as required.



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Medical Marijuana Control Program (MMCP)

2D Security Plan (Maximum of 30 pages, see instructions for formatting)

**Please note: The following must be submitted in a non-identified format.
Include this form as a cover page.**

Applicant should provide a narrative detailing support for, at a minimum, the following:

Part I: Surveillance Technology and Physical Security

Physical equipment used to monitor the facility and meet the security requirements under Chapter 3796 of the Revised Code and the rules promulgated in accordance with Chapter 3796 of the Revised Code. (3796:2-1-03(B)(4)(b) and 3796:2-2-05)

- (A) Camera feed should traverse the IP network from the camera source to the server utilizing Motion JPEG (MJPEG) or MPEG-4/H.264/Advanced Video Coding codec technology.*
- (B) Data should be transmitted over the Real-time Protocol (RTP) or Real Time Streaming Protocol (RTSP).*
- (C) Camera should support pan, tilt, and zoom functionality and controls.*

Part II: Security and Transportation Policies and Procedures

- (A) A security plan in accordance with rule 3796:2-2-05 of the Administrative Code, that establishes policies and procedures to ensure a secure, safe facility to prevent theft, loss, or diversion and protect facility personnel. (3796:2-1-03(B)(4)(a))*
- (B) Transportation policies and procedures, which includes the transportation of medical marijuana from a cultivator to a processor or dispensary and from a cultivator to a testing laboratory in the state of Ohio, in accordance rule 3796:5-3-01 of the Administrative Code. (3796:2-1-02(B)(5)(c), 3796:2-1-03(B)(4)(e))*

Part III: Facility Plot Plan and Specifications

A plot plan of the cultivation facility drawn to a reasonable scale that designates the different areas of operation, including the marijuana cultivation area, with the mandatory access restrictions. (3796:2-1-03(B)(4)(d), 3796:2-1-02(B)(5)(d))

- (A) If the building is in existence at the time of the application, the applicant shall submit plans and specifications drawn to scale for the interior of the building.*



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(B) If the building is not in existence at the time of application, the applicant shall submit a plot plan and a detailed drawing to scale of the interior and the architect's drawing of the building to be constructed.

Part IV: Emergency Notification Procedures

Emergency notification procedures with the department, law enforcement, and emergency response professionals. (3796:2-1-03(B)(4)(c))

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All holding areas are subject to SOPs requiring all security and sanitation protocols be followed in their entirety and properly documented. All seeds, immature medical marijuana plants, medical marijuana plants and medical marijuana held for disposal will be:

- Stored in a locked container;
- In a secure area under surveillance;
- Recorded in the log and the inventory system, when necessary; and
- Disposed of in accordance with the company's waste disposal policies and procedures and regulations. All storage areas will be maintained in a clean and orderly condition and will be located in a secure, locked and restricted area until it can be properly disposed.

Fencing will be constructed/maintained around OMMPC approved disposal or compost areas and containers outside of the facility.

RECORDS RETENTION AND STORAGE

The Company has adopted procedures for maintaining security records that conform to medical marijuana regulations and best practice for the medical marijuana and pharmaceutical sectors. The Company maintains a detailed description of plans, procedures and systems adopted and maintained for tracking, record keeping, record retention and surveillance systems, relating to all medical marijuana at all stages from seed to sale and will maintain records required for a minimum period of five years and make these records available to the MMCP upon request.

Video Recordings

The Security Manager will ensure 24-hour recordings from the video surveillance system are available for immediate viewing by the authorities or the time period required by regulations. Company policy is to archive these recordings for a minimum of five years or longer as necessary per MMCP regulations. The COO in coordination with the Security Manager will ensure the proper retention of all recordings.

Storage of Recordings

The Company will maintain all security system equipment and recordings in a secure location so as to prevent theft, loss, destruction or alterations. A current list of authorized employees and service personnel that have access to the surveillance room will be maintained and enforced by the Security Manager. Records of security tests will be maintained for a minimum of five years and made available to the MMCP upon request. The recordings will be stored in a format that may be easily accessed for investigative purposes. The recordings will be kept at a locked place in a limited access area or in a secure cloud location approved by the MMCP. The facility will have an electronic back-up system for all electronic records.

Visitor Logs

The Company will maintain visitor record logs for a minimum of five years and make the log available to the MMCP, State or local law enforcement and other State or local government

officials upon request if necessary to perform the government officials' functions and duties. The log will include, at a minimum:

- Date
- Visitor badge number
- Printed visitor name and signature
- Copy of ID
- Reason for visit and escort's Initials
- Time of entry and departure

System Maintenance Records

The Company will retain at the facility or in cloud storage, for a minimum five years, records of all inspections, servicing, alterations and upgrades performed on the systems and will make the records available to the MMCP and its authorized employees upon request.

Security Records

Upon the request of the MMCP or law enforcement as part of their official duties, the Company will provide up to four screen captures of an unaltered copy of a video surveillance recording. The GM will ensure that all theft or loss reports originating from any department are reported to the appropriate law enforcement agency and regulatory agency as required by regulations and fully documented in Company's records.

If the Company is notified in writing by the MMCP or its authorized employees, law enforcement, or other Federal, State or local government officials of a pending criminal or administrative investigation for which a recording may contain relevant information, the company will retain an unaltered copy of the recording until the investigation or proceeding is closed or if the entity conducting the investigation or proceeding notifies the Company that it is not necessary to retain the recording, whichever is longer.

PREMISES ACCESSIBILITY

General Visitor Policies

The Company's visitor protocols include restrictive access policies. "Easy Lobby" or a similar technology will be deployed by taking a picture and thermos transfer to the visitors pass. The Company will have a strict policy forbidding any principal, financial backer, operator or employee of the Company from receiving any type of consideration or compensation for allowing a visitor to enter a limited access area. Company escorts will ensure that visitors do not touch any medical marijuana in the limited access areas.

Only customers, registered employees, MMCP representatives, law enforcement, and other officials acting in the course of their duties and outside vendors, contractors and visitors may access the licensed facility. An employee will contact law enforcement as necessary to remove unauthorized individuals from the premises. It is Company policy to prohibit any unannounced visitors at any company facility, other than customers. The exception to this rule covers all

MMCP representatives and other designated officials that may conduct both announced and unannounced visits to the facility following the company's compliance policies.

The Security Manager or GM will approve all visitors, except as noted above. The employee checking the visitor in will obtain a copy of identification (driver's license, official badge, etc.) for each visitor and attach it to the Visitor Log. A visitor identification badge will be issued to a visitor by the Security Manager, GM (or their designee) and clearly displayed by the visitor before entering any limited access area. The employee issuing the badge is responsible for ensuring the badge is returned. If a visitor badge is not returned, the employee will notify a manager immediately, and the manager will record the badge number as missing including information on the visitor.

Identification Badges

Badge issuance authority is assigned to management, and it is established that each employee, contractor, and visitor is responsible for the safekeeping of his or her badge. Each employee, contractor and visitor will be in possession of an identification badge when on company. The purpose of the identification badge policies and procedures is to enhance the security and safety of Company employees, customers, physical and financial assets.

Employee license cards are issued by the MMCP. No employee may work or volunteer in a facility unless they are registered with the MMCP. The Security Manager or a manager will issue a contractor badge.

Employees will display identification at all times while working. Employees will report a lost employee occupational license or registration card to their supervisor immediately.

Door Access Reports

The GM will be responsible for using Identiv Velocity (or equivalent) software applications to assign, limit, and record access control activity. This FICAM solution and Hirsch hardware is used in governmental applications. All doors without biometric or electronic access control systems will be re-coded or re-keyed annually and following any involuntary termination.

Inspection/Service/Alteration Protocols

The company will keep all security equipment in full operating order and will test such equipment no less than monthly at each facility. The Company will hire a qualified alarm system vendor and a qualified surveillance system vendor to inspect and test all devices once every year.

The Company will only use vendors that are licensed and approved by the MMCP as necessary. Records of security tests will be maintained for five years and made available to the MMCP or law enforcement upon request.

The Security Manager will notify the MMCP immediately in the event of a mechanical malfunction of the security or surveillance system that will exceed a four-hour period. In event of

If any suspicious activity occurs during transport, a transporting employee will maintain radio or cell phone communication during the event to report all details to the facility. If communication fails for any reason, the employee will make contact by land-line as soon as possible.

Reporting

The Inventory Manager will be responsible for reporting all transportation events. All transportation events will be recorded in the Transportation Event Log including at a minimum the end time of the trip and any deviation from the trip plan.

In the case of an emergency stop, a detailed reporting in the Transportation Event Log will be recorded describing the reason for the event, the duration, the location, and any activities of employees exiting the vehicle. Transporting employees will report any accidents, product thefts, adverse losses, manifest discrepancies or other unusual occurrences immediately to the Inventory Manager who will report any such occurrences to the GM immediately. Reports will be entered into the Transportation Event Log and made available for review by the MMCP or law enforcement upon request.

The GM will immediately report to the MMCP and local law enforcement any diversion, losses, or other reportable incidents that occur during transport. The report will include discrepancies identified during transportation operations, any suspicious act involving the transportation of medical marijuana by any person, unauthorized destruction of medical marijuana during transportation, any loss or unauthorized alteration of records related to medical marijuana transportation or any other breach of security.

After the initial report to the MMCP and local law enforcement, the GM will conduct an investigation and review the Company's standard plan of operation. If necessary, the COO will make modifications to the SOP. The GM will submit a written preliminary report of the investigation to the MMCP within seven days of discovering the discrepancy. The COO will submit a final written report within 30 days of discovering the discrepancy.

Company Owned or Leased Vehicles

It is Company policy that all Company-Owned, Leased or Rented Vehicles be operated in a safe and responsible manner in accordance with local and federal regulations, all operators possess a valid driver's license, and follow the requirements and procedures outlined in our vehicle safety SOP.

The GM is responsible for vehicle safety, including performing motor vehicle record checks for prospective drivers, advising department managers of any suspended licenses or unlicensed drivers and investigating accidents in which company-owned or leased vehicles, used for company business, are involved. The GM will manage accident claims involving Company-Owned, Leased or Rented Vehicles or personal vehicles used for company business.

Company-owned or leased vehicles will not be used for personal use. If it is determined that employees are using such vehicles for personal use, their driving privileges will be suspended immediately, and they may be subject to disciplinary action up to and including termination.

Vehicle Checks

Prior to loading the vehicle, the Inventory Manager will perform a vehicle check to: ensure the delivery vehicle has a working communications radio or that the delivery team has working cell phones; ensure the vehicle has sufficient fuel to complete the roundtrip; is displaying a valid license plate and valid inspection sticker; has proof of insurance; and notes any existing body damage. The driver will perform a separate check to make sure the mirrors and the hand and emergency breaks are in working order prior to leaving the facility.

Vehicle Accidents

All vehicle accidents involving Company-Owned, Leased or Rented Vehicles, or personal vehicles being used for company business, will be reported immediately to the Company and local law enforcement. If a driver is involved in an accident, the Company reserves the right to request a copy of the driver's motor vehicle driving record.

For accidents involving a personal vehicle being used for company business, the driver's personal vehicle insurance will be the primary form of insurance coverage. If the loss limit exceeds the driver's personal vehicle insurance coverage, the Company's insurance will apply secondarily.

PART IV: EMERGENCY NOTIFICATION PROCEDURES

The Company will employ devices that can be activated by an employee in need of immediate assistance. An activated alarm summons immediate help because of an adverse or life-threatening emergency. Locations include reception desks, distribution areas, product storage vaults and delivery vehicles. The security system also features fire safety components that control notifications and access control.

The intrusion system portion of the integrated security system includes duress alarm feature, a silent security alarm system signal generated by a designated code entry to signal that the alarm user is being forced to turn off the system. The system also includes panic alarms, which emit an audible security alarm system signal from manual activation intended to signal a life-threatening or emergency situation requiring a law enforcement response. The integrated security system will also have a holdup alarm, which can send a silent alarm signal, generated by a manual activation intended to signal a robbery in progress, to law enforcement.

The integrated security system includes an automatic voice dialer capable of being programmed to send a prerecorded voice message to law enforcement, public safety or an emergency services agency requesting dispatch. The system also features a failure notification system providing audible, text or visual notifications. The failure notification system will provide by telephone, e-mail or text message an alert to a designated security person within the facility within five minutes after the failure. The integrated security system and all of its components will be on an Uninterruptable Power Supply (UPS), either local or building system and will have the ability to remain operational for up to forty-eight (48) hours during a power outage.

FIRE AND LIFE SAFETY

The Company's security contractor will also install and maintain smoke alarms and fire alarms connected to the security system capable of notifying first responders of any incident. All fire protection equipment installed will be listed by U.L. and meet NFPA 13 and 72 standards.

All employees will be properly trained in fire prevention and mitigation measures. In-house fire safety training for all employees will cover the following topics and provide simple procedures all employees must perform in an emergency. Training materials include safety posters which will be posted throughout the facility, video SOPs, and mock emergencies.

Flammable materials will be stored in a fire locker and properly labeled for first responder identification. All areas of egress will be properly signed in accordance with NFPA 704 standards. The facility will comply with all local fire codes. Fire extinguishers will be maintained annually.

OTHER EMERGENCIES

Gas Spill

Gas leaks require an immediate evacuation until the fire department clears the facility. Any employee discovering a gas leak will be trained to shut off the gas immediately and notify a manager to begin evacuation procedures.

Chemical Spill

All employees will be appropriately trained on spill response. Every employee is responsible for participating in spill response activities. A fully stocked spill kit will be maintained in the facilities. Areas with high spill risk will be stocked with a mobile spill kit for immediate mitigation.

Medical Emergency

All employees who work on-site will receive medical emergency training. The type of training and frequency is dependent on their job description. Managers will receive two-year Red Cross First Aid and CPR/AED certification upon hire. Other employees will receive training after their ninety-day review.

Natural Disaster/Evacuation Protocol

Any manager may determine the need to evacuate an area at any time for any reason. If there is not an imminent danger, any medical marijuana product which is outside the controlled limited access area should be returned prior to leaving the building. Reasons to evacuate may include: fire, bomb threat, a hostile person, power outage, earthquake, water or gas leak, chemical spill. All employees must ensure that patients and customers do not use elevators, gather in lobbies, bring disabled individuals to stairwells, open doors without checking for heat, run or panic, re-enter the building without permission.

INCIDENT REPORTING

Incident reporting will be documented by the department manager and reported immediately to the GM or the Security Manager, in accordance with company reporting and notifications policies and procedures. All incident activities, from receipt of the initial report through post-incident review, are to be documented. The Security Manager is responsible for ensuring all events are recorded, assembling these records in preparation and performance of the post-incident review and ensuring all records are preserved for review.

Reporting of Records Incidents

Any loss or unauthorized alteration of records of the Company related to medical marijuana, customers or employees will be reported to the GM or Security Manager immediately. The Security Manager will report any such incident to the GM and the MMCP and law enforcement.

Termination of Operations Notification

If any department of the Company that requires licensing with the MMCP is closing for any reason, the COO will ensure that the MMCP is notified in accordance with regulations. In the case of an emergency that requires a temporary cessation of operations, the COO or GM will notify the MMCP immediately for further direction and instruction on the appropriate procedures to undertake. All activities will be appropriately documented and recorded by the GM during any period of temporary or permanent closure. The COO is responsible for the oversight of any temporary or permanent closure activities.



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Medical Marijuana Control Program (MMCP)

2E Financial Plan (Maximum of 10 pages, see instructions for formatting)

**Please note: The following must be submitted in a non-identified format.
Include this form as a cover page.**

Applicant should provide a narrative detailing support for the following:

Funding Analyses

A breakdown of the applicant's actual and anticipated sources of funding.

Operating Expense Breakdown

A cost breakdown of the applicant's anticipated costs in building the facility and implementing the policies and procedures submitted as part of the application. (3796:2-1-02(B)(6)(b), 3796:2-1-03(B)(5)(b))