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).
Cultivator Application – Filing Packet Section 1 Identifiable Information Checklist

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

<table>
<thead>
<tr>
<th>Business Entity Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Legal Name of Applicant (3796:2-1-02(B)(2)(a)):</td>
</tr>
<tr>
<td><strong>OPC Cultivation, LLC</strong></td>
</tr>
<tr>
<td>2. Trade Name of Applicant:</td>
</tr>
<tr>
<td><strong>Ohio Patients' Choice, LLC</strong></td>
</tr>
<tr>
<td>3. Type of Organization/ Applicant Business Type (3796:2-1-02(B)(2)(b)):</td>
</tr>
<tr>
<td>□ Individual/ Sole Proprietorship</td>
</tr>
<tr>
<td>□ Corporation</td>
</tr>
<tr>
<td>□ Partnership</td>
</tr>
<tr>
<td>□ Limited Liability Corporation</td>
</tr>
<tr>
<td>□ Association/ Cooperative</td>
</tr>
<tr>
<td>□ Joint Venture</td>
</tr>
<tr>
<td>□ Other: ________</td>
</tr>
<tr>
<td>4. Ohio Secretary of State Business Identification Number (3796:2-1-02(B)(2)(c)):</td>
</tr>
<tr>
<td><strong>4037630</strong></td>
</tr>
<tr>
<td>5. Business Address:</td>
</tr>
<tr>
<td><strong>200 Public Square, Suite 2500</strong></td>
</tr>
<tr>
<td>6. City:</td>
</tr>
<tr>
<td><strong>Cleveland</strong></td>
</tr>
<tr>
<td>7. State:</td>
</tr>
<tr>
<td><strong>OH</strong></td>
</tr>
<tr>
<td>8. Zip Code:</td>
</tr>
<tr>
<td><strong>44114</strong></td>
</tr>
<tr>
<td>9. Proposed Facility Physical Address (if different than above) (3796:2-1-02(B)(2)(d)):</td>
</tr>
<tr>
<td><strong>2300, University Drive East</strong></td>
</tr>
<tr>
<td>10. City (if different than above):</td>
</tr>
<tr>
<td><strong>Huron</strong></td>
</tr>
<tr>
<td>11. State:</td>
</tr>
<tr>
<td><strong>Ohio</strong></td>
</tr>
<tr>
<td>12. Zip Code:</td>
</tr>
<tr>
<td><strong>44839</strong></td>
</tr>
<tr>
<td>13. Business Phone Number:</td>
</tr>
<tr>
<td><strong>216-738-3040</strong></td>
</tr>
<tr>
<td>14. Email Address:</td>
</tr>
<tr>
<td><strong><a href="mailto:info@ohiopatientschoice.com">info@ohiopatientschoice.com</a></strong></td>
</tr>
</tbody>
</table>

Primary Contact or Registered Agent Information

<table>
<thead>
<tr>
<th>15. First Name</th>
<th>16. M.I.</th>
<th>17. Last Name</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Yehuda</strong></td>
<td></td>
<td><strong>Wolf</strong></td>
</tr>
</tbody>
</table>

Owner

<table>
<thead>
<tr>
<th>18. Title (i.e., Owner, President, etc.)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Yehuda Wolf</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>19. Mailing Address (if different than Business Address):</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>200 Public Square, Suite 2500</strong></td>
</tr>
<tr>
<td>20. City:</td>
</tr>
<tr>
<td><strong>Cleveland</strong></td>
</tr>
<tr>
<td>-----------</td>
</tr>
<tr>
<td>OH</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>24. Email Address (if different than Business Email):</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Redacted]</td>
</tr>
</tbody>
</table>

(Optional) Alternative Contact Information

<table>
<thead>
<tr>
<th>25. First Name</th>
<th>26. M.I.</th>
<th>27. Last Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jeffrey</td>
<td>J.</td>
<td>McCourt</td>
</tr>
</tbody>
</table>

28. Title (i.e., Owner, President, etc.)

Counsel

29. Mailing Address (if different than Business Address):

<table>
<thead>
<tr>
<th>30. City:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cleveland</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>31. State:</th>
<th>32. Zip Code:</th>
<th>33. Phone Number:</th>
</tr>
</thead>
<tbody>
<tr>
<td>OH</td>
<td>44114</td>
<td>216-363-4428</td>
</tr>
</tbody>
</table>

34. Email Address (if different than Business Email):

jmccourt@beneschlaw.com

Identifying Tax Information

<table>
<thead>
<tr>
<th>35. FEIN/SSN</th>
<th>36. CAT Account #:</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Redacted]</td>
<td>To come</td>
</tr>
</tbody>
</table>

37. Vendor’s License #: To come

38. Employer Withholding Account #: To come

39. Other Accounts at the Department of Taxation

N/A
**1B Liquid Assets Form**
3796:2-1-03(A)(1), 3796:2-1-03(B)(5)(c)

<table>
<thead>
<tr>
<th>To be Completed by Applicant</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations:</strong></td>
</tr>
<tr>
<td><strong>OPC Cultivation, LLC</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>To be Completed by Applicant or CPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ 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.</td>
</tr>
<tr>
<td><strong>-OR-</strong></td>
</tr>
<tr>
<td>☐ 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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date of Certification (must be within 30 days of Application submission) (3796:2-1-03(B)(5)(c)(ii)):</th>
</tr>
</thead>
<tbody>
<tr>
<td>6/26/17</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Printed Name of CPA or Applicant</th>
<th>CPA Company Name (if applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adam J. Hill, CPA</td>
<td>Cohen &amp; Company, Ltd</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Phone Number:</th>
<th>Signature:</th>
</tr>
</thead>
<tbody>
<tr>
<td>216-774-1130</td>
<td>[Signature]</td>
</tr>
</tbody>
</table>

Subscribed and sworn to before me this **28** day of **June** **2017**.

---

*Consistent with guidance from the Department of Commerce, we are certifying that a financially interested party or financially interested parties of the Applicant hold in their account(s) amounts in excess of $500,000 which will be contributed to the Applicant.*
To be Completed by Applicant

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

OPC Cultivation, LLC

☐ 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-

☐ 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: 6/22/2017

Signature: [Signature]

Subscribed and sworn to before me this 22nd day of JUne, 2017.

(SEAL)

KAREN O'ROURKE
NOTARY PUBLIC

MMCP-C-1001A (v1.1), Ohio Cultivator Application for Certifiers
## ID Financial Responsibility Form – Escrow / Surety

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

<table>
<thead>
<tr>
<th>To be Completed by Applicant or CPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations:</td>
</tr>
<tr>
<td>OPC Cultivation, LLC</td>
</tr>
</tbody>
</table>

### Type of Security:

- [ ] Escrow Account  
  
  (3796:2-1-05(B)(2))

- [ ] Surety Bond  
  
  (3796:2-1-05(B)(3))

- [ ] Level I: 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.

- [ ] 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)):

**Atlantic Specialty Insurance Company**

Printed Name:  
Adam J. Hill, CPA

CPA Company Name (if applicable):  
Cohen & Company Ltd

Phone Number:  
216-774-1130

Signature: 
[Signature]

Subscribed and sworn to before me this __28__ day of __June__, __2017__.

[Seal]

[Notary Public]

Commission expires __3/13/2018__.
To be Completed by the Applicant

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

**OPC Cultivation, LLC**

Physical Address and Name of Proposed Medical Marijuana Cultivator Facility:

**2300 University Drive, East**

<table>
<thead>
<tr>
<th>City: City of Huron</th>
<th>County: Erie</th>
</tr>
</thead>
<tbody>
<tr>
<td>State: Ohio</td>
<td>Zip Code: 44839</td>
</tr>
<tr>
<td>Phone Number: 216-738-3040</td>
<td></td>
</tr>
</tbody>
</table>

Legal Description of the Property:

18.68 acres of vacant land, comprised of two (2) parcels zoned Light Industrial (PPN: 42-00684.000 and 42-01972.001)

To be Completed by the Owner of the Physical Address of the Proposed Cultivator

Name of Owner of the Physical Address of the Proposed Medical Marijuana Cultivator Facility:

**City of Huron**

Length of Lease/Expiration:

The City of Huron has entered into a contingent purchase & sale agreement with [Name of Applicant] (Huron Corporate Park, LLC). Applicant has entered into a contingent 25-year lease with [Name of Applicant] (Huron Corporate Park, LLC).

☐ The individual or entity applying for a Medical Marijuana Cultivator Certificate of Operations is the owner of the physical address of the proposed Medical Marijuana Cultivator.

☐ The owner of the physical address of the proposed Medical Marijuana Cultivator gives permission to the individual or entity applying for a Medical Marijuana Cultivator Certificate of Operations to operate a Medical Marijuana Cultivator facility at the physical address.

<table>
<thead>
<tr>
<th>PROPERTY OWNER SIGNATURE</th>
<th>DATE SIGNED</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Signature]</td>
<td>6-15-17</td>
</tr>
</tbody>
</table>

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

[Stamp]

DIANA KRAWETZKI

SEAL

NOTARY PUBLIC
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.
<table>
<thead>
<tr>
<th>ID</th>
<th>PARCEL NO.</th>
<th>CODE</th>
<th>LAND USE DESCRIPTION</th>
<th>OWNER</th>
</tr>
</thead>
<tbody>
<tr>
<td>SITE</td>
<td>42-01972.001</td>
<td>640</td>
<td>EXEMPT OWNED BY CITY OR VILLAGE</td>
<td>CITY OF HURON OHIO</td>
</tr>
<tr>
<td>1</td>
<td>42-02070.001</td>
<td>455</td>
<td>COMMERCIAL GARAGES</td>
<td>FAHEY KEVIN P</td>
</tr>
<tr>
<td>2</td>
<td>42-02070.000</td>
<td>100</td>
<td>AGR VACANT LAND</td>
<td>DRYER PROPERTIES LLC</td>
</tr>
<tr>
<td>3</td>
<td>42-01799.000</td>
<td>480</td>
<td>COMMERCIAL WAREHOUSES</td>
<td>MIHALEK DANIEL J &amp; LO R I A</td>
</tr>
<tr>
<td>4</td>
<td>42-60478.000</td>
<td>650</td>
<td>EXEMPT OWNED BY SCHOOLS</td>
<td>BOARD OF EDUCATION HURON CITY SCHOOLS</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>(BUS GARAGE- NO “SCHOOL” FACILITIES OR ACTIVITIES)</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>42-00918.000</td>
<td>350</td>
<td>INDUSTRIAL WAREHOUSES</td>
<td>SAWMILL REALTY INVESTORS LLC</td>
</tr>
<tr>
<td>6</td>
<td>42-02023.000</td>
<td>499</td>
<td>OTHER COMMERCIAL STRUCTURES</td>
<td>TERMINAL LIMITED PARTNERSHIP</td>
</tr>
<tr>
<td>7</td>
<td>42-02021.000</td>
<td>300</td>
<td>INDUSTRIAL VACANT LAND</td>
<td>IAC HURON LLC</td>
</tr>
<tr>
<td>8</td>
<td>42-02021.001</td>
<td>455</td>
<td>COMMERCIAL GARAGES</td>
<td>HERBST ROBERT H JR</td>
</tr>
<tr>
<td>9</td>
<td>42-02021.000</td>
<td>330</td>
<td>MANUFACTURING AND/OR ASSEMBLY</td>
<td>IAC HURON LLC</td>
</tr>
<tr>
<td>10</td>
<td>42-00826.000</td>
<td>110</td>
<td>AGR VACANT LAND (ON CAUV)</td>
<td>J CONRAD LTD</td>
</tr>
<tr>
<td>11</td>
<td>42-01972.000</td>
<td>110</td>
<td>AGR VACANT LAND (ON CAUV)</td>
<td>KNUPKE WAYNE J &amp; HELEN R</td>
</tr>
<tr>
<td>12</td>
<td>42-01972.005</td>
<td>400</td>
<td>COMMERCIAL VACANT LAND</td>
<td>J I B INVESTMENTS LLC</td>
</tr>
<tr>
<td>13</td>
<td>42-01972.006</td>
<td>442</td>
<td>MEDICAL CLINICS AND/OR OFFICES</td>
<td>ANGTIN LLC</td>
</tr>
<tr>
<td>14</td>
<td>42-01972.002</td>
<td>340</td>
<td>MANUFACTURING &amp;/OR ASSEMBLY (LIGHT)</td>
<td>PETERMAN MATTHEW D</td>
</tr>
<tr>
<td>15</td>
<td>42-01972.007</td>
<td>447</td>
<td>OFFICES (1 &amp; 2 STORIES)</td>
<td>DJ CLARK LLC</td>
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<tr>
<td>16</td>
<td>42-01972.008</td>
<td>447</td>
<td>OFFICES (1 &amp; 2 STORIES)</td>
<td>HORVATH REALTY GROUP LLC</td>
</tr>
<tr>
<td>17</td>
<td>42-01972.001</td>
<td>640</td>
<td>EXEMPT OWNED BY CITY OR VILLAGE</td>
<td>CITY OF HURON OHIO</td>
</tr>
<tr>
<td>18</td>
<td>42-01972.004</td>
<td>445</td>
<td>SAVINGS AND LOANS</td>
<td>VACATIONLAND FEDERAL CREDIT UNION</td>
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<tr>
<td>19</td>
<td>42-01972.010</td>
<td>480</td>
<td>COMMERCIAL WAREHOUSES</td>
<td>CENTRAL OHIO PAPER &amp; PACKAGING</td>
</tr>
<tr>
<td>20</td>
<td>42-00684.001</td>
<td>340</td>
<td>MANUFACTURING &amp;/OR ASSEMBLY</td>
<td>HUMANETIC INNOVATIVE SOLUTION INC</td>
</tr>
</tbody>
</table>
# 1G Notice of Proper Zoning Form

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

## To be Completed by Applicant

<table>
<thead>
<tr>
<th>Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations:</th>
</tr>
</thead>
<tbody>
<tr>
<td>OPC Cultivation, LLC</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Physical Address and Name of Proposed Medical Marijuana Cultivator Facility:</th>
</tr>
</thead>
<tbody>
<tr>
<td>2300 University Drive, East</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>City:</th>
<th>County:</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Huron</td>
<td>Erie</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>State</th>
<th>Zip Code</th>
<th>Phone Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ohio</td>
<td>44839</td>
<td>216-738-3040</td>
</tr>
</tbody>
</table>

## To be Completed by Zoning Authority or Local Government

<table>
<thead>
<tr>
<th>Jurisdiction of Zoning Office or Local Government</th>
</tr>
</thead>
</table>

## City of Huron

- The Applicant has applied for local zoning approval to operate a Medical Marijuana Cultivation facility at the address listed above. *(If Permit Issued, include as Attachment III.)*
- The Applicant complies with local zoning laws and regulations to operate a Medical Marijuana Cultivation facility at the address listed above at this time.
- The area of City of Huron has no local moratorium on Medical Marijuana facilities in place at this time. *(3796:2-1-03(A)(4))*
- The area of __________________________________ has no zoning in place at this time.

## Printed Name of Authorized Zoning Representative:

<table>
<thead>
<tr>
<th>Mike Spafford</th>
<th>Assistant to the City Manager</th>
</tr>
</thead>
</table>

Signature:

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

[Seal]

**DIANA KRAWETZKI**

**NOTARY PUBLIC**

STATE OF OHIO

Recorded in Erie County

My Comm. Exp. 4/5/21

MMCP-C-1001A (v1.0), Ohio Cultivator Application – Filing/Identifiers
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.

Mark one of the boxes above.

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

CITY OF HURON
Erie, Ohio
City Manager's Office
417 Main St., Huron, Ohio 44839
419-433-5000

Zoning Permit Number: 2017-0050

ADDRESS: RYE BEACH ROAD
PARCEL NO.: 4201972001

ZONING:

ISSUED TO: HURON CORPORATE PARK LLC
200 PUBLIC SQUARE SUITE 2500
CLEVELAND OH 44113

PERMIT TYPE: COMMERCIAL STRUCTURE
DETAILS:
PERMIT DATE: 06/07/2017

FEE: $2,900.00
EXPIRE DATE: 06/07/2018

It is hereby certified that the above use as shown on the plats and plans submitted with the application conforms with all applicable provisions of the City of Huron Zoning Ordinance. The issuance of this Permit does not allow the violation of City of Huron Zoning Ordinances or other governing laws.

The applicant is responsible for obtaining a building permit (if required) prior to commencing work on the proposed improvement. A final zoning inspection must be scheduled by the applicant.

APPROVED BY: ___________________________  DATE: 06/15/2017

Zoning Inspector
HURON TOWNSHIP
BUILDING DEPARTMENT

June 12, 2017
CONDITIONAL PLAN APPROVAL
(Structural Only)

PROJECT: Huron Corporate Park LLC.
University Drive East
Huron, Ohio

OWNER: Huron Corporate Park LLC.
200 Public Square
Cleveland, Ohio

The following conditions and requirements are part of the plan approval. Each and every item called for in this document shall be completed prior to the final approval by this Department.

This approval is for the structural portion of the new facility only. All other trades (electrical, mechanical, fire suppression, & fire alarms) must be submitted and will be reviewed separately. The use group is F-1/U. The type of construction of this building is 2B.

The plans bear the seal of:
Brian G. Fabo, Architect
Registration #11898

1. The plans have been reviewed for compliance with the Ohio Building Code. There may be other regulations applicable under local, federal, or state statutes which the Building Department has no authority to enforce and, therefore, have not been evaluated as part of the plan review. It is the responsibility of the Owner and the Contractor to comply with all federal, state, local, or county jurisdictions and authorities.

2. The structural drawings were reviewed for general conformance to the OBC requirements only. The applicant is responsible for compliance with the NEC, the OMC, and NFPA as well as the OBC.

3. If substantial changes to the building or systems are contemplated after the first document submittal, or during construction, those changes must be submitted to the Building Official for review and approval prior to the changes being executed. The Building Official may waive this requirement in; the instance of an emergency repair, or similar instances per OBC Section 106.4.

4. Buildings/structures shall not be used or occupied in whole or in part until a Certificate of Occupancy has been issued by the Building Official for each building/structure. A temporary Occupancy permit can be issued by the Building Official prior to the completion of all work provided there are no serious hazards.

5. You are required to comply with Chapter 33 of the OBC “Safeguards During Construction” and all OSHA safeguards for workers.
6. One set of plans and this “Certificate” shall be maintained at the site of the work during construction and be available for reference by the Building Inspector and the Fire Inspector per OBC Sections 106.3.1 and 105.7.2.

7. Fire extinguishers shall be placed in accordance with the direction given by the Huron Fire Department.

8. This document is prepared in duplicate. Plan approval will be valid only upon receipt of one signed copy of this document by the Huron Township Building Department within ten (10) days. The signing of this document is an Agreement that you will comply with all listed items.

[Signature]

David Schlegel
Owner

[Signature]

Chief Financial Officer

Date: June 22, 2017
CITY OF HURON
ZONING CHECKLIST

Project Address: University Dr.
Parcel Number: 

CONTRACTOR INFORMATION:

Business Name: Huron Corporate Park LLC
Contact Name: Eric Edwards B
Address: FA30 Architect: 1731e Columbus Rd (Le. OH 44113
Phone: 216-241-6150 x112 EMAIL: 

Is the Contractor Registered: Yes O
City Representative: 

ZONING:

Property Information:

Zoning District: I-1 / Corporate Park
Proposed Use: Office + greenhouse + warehousing

Does the use comply? Yes O No O
Zoning Certificate Issued: Yes O
Date Issued: Planning Commission approved - 4/26/17
Zoning Inspector: 

BUILDING:

Was the application given to the applicant: Yes O
Structural: O Roof: O
Detached Building: O Electrical: O
Deck: O Commercial/Industrial: O

Was the completed application returned: Yes O
Is the cross section attached: Yes O

Date Completed Application Submitted to the Building Department: 6/1/17
Date Approved Permit was returned to the City: 
Zoning (City) Signature: 
Building (Township) Signature: 
No. 6159

HURON TOWNSHIP
DIVISION OF BUILDING INSPECTION

Huron, Ohio 44839
Date June 12, 2017

Under the authority of the Building Code and the Zoning of Huron Township, permission is hereby granted to:

Owner: Huron Cooperative Park LLC
Address: 2300 University Dr. East
Lot No./Parcel No.: 42-01972.001
Type of Building: Commercial

Specific Occupancy: Structure Only
Work to consist of: New Construction
Applicable Code: OBC
Estimated Cost: $500,000

All work performed under this permit shall conform to the approved application and plans, and amendments thereto. The location of all construction shall be shown on the Plot Plan. The approval of plans procured by misrepresentation of facts or conditions, misinformation in application or through mistakes or improper action by any officer or employee of this department, does not legalize any illegal construction or arrangement.

Building Official or Authorized Representative:
Owner or Contractor:

Fee Received: $21,293.34

□ ELE  □ BLD  □ APL  □ OTHER: Plan Review

FOR OFFICE USE ONLY:
General Fee: $18,514.34  Milan Twp.: $  Milan Village: $  Huron City: $2,778.00

NOT VALID UNLESS PAID
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.**
1L Business in Other Jurisdictions Form  
3796:2-1-02(B)(2)(g)  

To be Completed by Applicant  

<table>
<thead>
<tr>
<th>Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations:</th>
<th>OPC Cultivation, LLC</th>
</tr>
</thead>
</table>

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):

<table>
<thead>
<tr>
<th>State</th>
<th>Type</th>
<th>Dates of Issue/Expiration</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

See Attached Addendum

- [ ] 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))

- [ ] 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).**

OPC Cultivation, LLC  
See Attached Addendum
Ohio Department of Commerce
Medical Marijuana Control Program (MMCP)

Signature
Yehuda M. Wolf

Date
06/57/17

Subscribed and sworn to before me this 27th day of June, 2017.

AMY M. CAMARDA
NOTARY PUBLIC
FOR THE
STATE OF OHIO
My Commission Expires
June 4, 2021

Amy M. Camarda
NOTARY PUBLIC
### Section 1L - Addendum

**Licenses Held by Consultant to Applicant:** Simply Pure Colorado, LLC (d/b/a Simply Pure), is an entity owned/controlled by Wanda James, a flat fee-for-service consultant and strategic advisor to Applicant. Simply Pure Colorado, LLC is not otherwise in any way owned or affiliated with Applicant or any Owner or Officer of Applicant, nor are/were any of these licenses ever held by Applicant, any Owners or Officers or anyone with a "financial interest" in Applicant.

<table>
<thead>
<tr>
<th>State</th>
<th>Type</th>
<th>Licensed Entity</th>
<th>Dates of Issue/Expiration</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Colorado</td>
<td>Retail Marijuana Store</td>
<td>Simply Pure Colorado, LLC (d/b/a Simply Pure)</td>
<td>Ex. 10/08/2017</td>
<td>402R-00510</td>
</tr>
<tr>
<td>Colorado</td>
<td>Retail Marijuana Cultivation Facility</td>
<td>Simply Pure Colorado, LLC (d/b/a Simply Pure)</td>
<td>Ex. 11/21/2017</td>
<td>403R-00411</td>
</tr>
<tr>
<td>Colorado</td>
<td>Center 1 Type 1 (Medical Dispensary)</td>
<td>Simply Pure Colorado, LLC (d/b/a Simply Pure)</td>
<td>Ex. 05/22/2017*</td>
<td>402-01050</td>
</tr>
<tr>
<td>Colorado</td>
<td>Optional Premises (Medical Grow)</td>
<td>Simply Pure Colorado, LLC (d/b/a Simply Pure)</td>
<td>Ex. 05/22/2017*</td>
<td>403-01645</td>
</tr>
<tr>
<td>Colorado</td>
<td>Infused Product Manufacturer</td>
<td>Edibles, LLC</td>
<td>Voluntary Surrender**</td>
<td>404-00041</td>
</tr>
</tbody>
</table>

*Note - Per CO Rev Stat § 12-43.4-310(1), licenses nos. 402-01050 and 403-01645 have been timely submitted for renewal to the Colorado Department of Revenue Marijuana Enforcement Division, and at the time of this application, these license are active pending renewal license investigation.

**Note - This license was held by Edibles, LLC (d/b/a Simply Pure), an entity controlled by Wanda James, a flat fee-for-service consultant and strategic advisor to Applicant, until 2012, when it was sold to an unrelated third party (Claystone Consulting, Inc.), who subsequently voluntarily surrendered this license with the State of Colorado. Neither Edibles, LLC nor Claystone Consulting, Inc. are in any way owned or affiliated with Applicant or any Owner or Officer of Applicant, nor are/were any of these licenses ever held by Applicant, any Owners or Officers or anyone with a “financial interest” in Applicant, and as such are being disclosed in order to be overly inclusive in response to the Department's requested information in Section 1L.
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.
STATE OF COLORADO
DEPARTMENT OF REVENUE

Marijuana
Enforcement Division

Medical Marijuana
Conditional License

SIMPLY PURE COLORADO, LLC

SIMPLY PURE

2000-2002 West 32nd Avenue, Denver, CO 80211
Center - Type 1 - 402-01050
License Valid Through: 05/22/2017

This license is conditioned upon Local Authority approval, pursuant to section 12-43.3-305(2) C.R.S.

This conditional license is issued subject to the laws of the State of Colorado and especially under the provisions of Title 12, Article 43.3, as amended. This conditional license is nontransferable and shall be conspicuously posted in the place above described. This conditional license is only valid through the expiration date shown above. Any questions concerning this conditional license should be addressed to: Colorado Marijuana Enforcement Division, 455 Sherman Street, Suite 390, Denver, CO 80203. In testimony whereof, I have hereunto set my hand.

James Burack
Division Director

Barbara J. Brohl, Executive Director
May 12, 2017

SIMPLY PURE COLORADO LLC
SIMPLY PURE
License Type: Center - Type 1
License #: 402-01050
Expiration date of license: 05/22/2017
2000-2002 West 32nd Avenue
Denver, CO 80211

To whom it may concern:

The purpose of this correspondence is to inform you that should the renewal license investigation for SIMPLY PURE COLORADO LLC continue past the date of expiration for the current license, the license will be administratively continued by the State Licensing Authority pursuant to 12-43.4-310(1) until the completion of the renewal license investigation. At the completion of the renewal license investigation, the Marijuana Enforcement Division will notify you of the outcome of the investigation.

Sincerely,

[Signature]

James Burack
Division Director
BUSINESS - PROFESSIONAL LICENSE
POST IN CONSPICUOUS PLACE

BUSINESS FILE NO.: 2010-BFN-1045689
APPLICATION DATE: 09/06/2016
SIMPLY PURE COLORADO, LLC
SIMPLY PURE
2000 W 32ND AVE
DENVER, CO 80211

STATE LIC NO.: 402-01050
OP: AC

ISSUE DATE
09/06/2016

EXPIRES
09/09/2017

LICENSE

LICEE Fee $3,000.00
APP Fee $0.00
DATE PAID 09/06/2016
FUND/ORG 01010-4001100
REVENUE 354960

COMMENTS

IT IS THE LICENSEE'S RESPONSIBILITY TO RENEW PRIOR TO
THE EXPIRATION DATE, IN ORDER TO AVOID PENALTY OR
REAPPLICATION FEES AND ADDITIONAL INSPECTIONS. THIS
LICENSE COVERS ONLY THOSE ACTIVITIES LISTED.
COMPLIANCE WITH ARTICLE IV OF CHAPTER 28 D.R.M.C. IS A
CONDITION OF THIS PERMIT

[Signatures]
STATE OF COLORADO
DEPARTMENT OF REVENUE

Marijuana
Enforcement Division

Medical Marijuana
Conditional License

SIMPLY PURE COLORADO, LLC
SIMPLY PURE
2154 South Jason Street, Denver, CO 80223
Optional Premises - 403-01645

License Valid Through: 05/22/2017

This license is conditioned upon Local Authority approval, pursuant to section 12-43.3-305(2) C.R.S.

This conditional license is issued subject to the laws of the State of Colorado and especially under the provisions of Title 12, Article 43.3, as amended. This conditional license is nontransferable and shall be conspicuously posted in the place above described. This conditional license is only valid through the expiration date shown above. Any questions concerning this conditional license should be addressed to: Colorado Marijuana Enforcement Division, 465 Sherman Street, Suite 390, Denver, CO 80203. In testimony whereof, I have hereunto set my hand.

James Burrack
Division Director

Barbara J. Brohl, Executive Director
CITY AND COUNTY OF DENVER  
DEPARTMENT OF EXCISE AND LICENSES  
201 W. COFFAX AVE DEPT #206  
DENVER, COLORADO 80202  
TELEPHONE: (720) 865-2740

BUSINESS - PROFESSIONAL LICENSE  
POST IN CONSPICUOUS PLACE

BUSINESS FILE NO.: 2015-BFN-0001547  
APPLICATION DATE: 05/11/2017

STATE LIC NO.: 403-01645  
OP: AM  
ISSUE DATE: 05/11/2017

SIMPLY PURE COLORADO, LLC  
SIMPLY PURE  
2154 S JASON ST  
DENVER, CO 80223

EXPIRES  
05/12/2018

LICENSE  
LICFEE  
APPFEE  
DATE PAID  
FUND/ORG  
REVENUE

Medical Marijuana Optional  
$3,000.00  
$0.00  
05/11/2017  
01010-4001100  
354980

Premesis Cultivation License Fee

COMMENTS

IT IS THE LICENSEE'S RESPONSIBILITY TO RENEW PRIOR TO  
THE EXPIRATION DATE. IN ORDER TO AVOID PENALTY OR  
REAPPLICATION FEES AND ADDITIONAL INSPECTIONS. THIS  
LICENSE COVERS ONLY THOSE ACTIVITIES LISTED.  
COMPLIANCE WITH ARTICLE IV OF CHAPTER 28 D.R.M.C. IS A  
CONDITION OF THIS PERMIT

[Signatures]

Director, Excise and Licenses  
Chief Financial Officer
STATE OF COLORADO
DEPARTMENT OF REVENUE

Marijuana
Enforcement Division

Retail Marijuana
Conditional License

SIMPLY PURE COLORADO, LLC
SIMPLY PURE
2150 South Lipan Street, Denver, CO 80223
Retail Marijuana Cultivation Facility - 403R-00411
License Valid Through: 11/21/2017

This license is conditioned upon Local Authority approval, pursuant to section 12-43.4-304(1) C.R.S.

This conditional license is issued subject to the laws of the State of Colorado and especially under the provisions of Title 12, Article 43.4, as amended. This conditional license is nontransferable and shall be conspicuously posted in the place above described. This conditional license is only valid through the expiration date shown above. Any questions concerning this conditional license should be addressed to: Colorado Marijuana Enforcement Division, 1707 Cole Blvd., Suite 300, Lakewood, CO 80401. In testimony whereof, I have hereunto set my hand.

James Burack
Division Director

Barbara J. Brohl
Executive Director
CITY AND COUNTY OF DENVER  
DEPARTMENT OF EXCISE AND LICENSES  
201 W. COLFAKX AVE DEPT #206  
DENVER, COLORADO 80202  
TELEPHONE: (720) 865-2740  

BUSINESS - PROFESSIONAL LICENSE  
POST IN CONSPICUOUS PLACE  

BUSINESS FILE NO.: 2014-BFN-0004212  
APPLICATION DATE: 02/03/2017  
SIMPLY PURE COLORADO LLC  
SIMPLY PURE  
2150 S LIPAN ST  
DENVER, CO 80223  

<table>
<thead>
<tr>
<th>LICENSE</th>
<th>LIC FEE</th>
<th>APP FEE</th>
<th>DATE PAID</th>
<th>FUND/ORG</th>
<th>REVENUE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marijuana Transfer of Ownership</td>
<td>$0.00</td>
<td>$100.00</td>
<td>02/03/2017</td>
<td>01010-4001100</td>
<td>403700</td>
</tr>
</tbody>
</table>

COMMENTS

IT IS THE LICENSEE'S RESPONSIBILITY TO RENEW PRIOR TO THE EXPIRATION DATE, IN ORDER TO AVOID PENALTY OR REAPPLICATION FEES AND ADDITIONAL INSPECTIONS. THIS LICENSE COVERS ONLY THOSE ACTIVITIES LISTED. COMPLIANCE WITH ARTICLE IV OF CHAPTER 28 D.R.M.C. IS A CONDITION OF THIS PERMIT.

Director, Excise and Licenses  
Chief Financial Officer
STATE OF COLORADO
DEPARTMENT OF REVENUE

Marijuana
Enforcement Division

Retail Marijuana
Conditional License

SIMPLY PURE COLORADO, LLC

SIMPLY PURE
2000 West 32nd Avenue, Denver, CO 80211
Retail Marijuana Store - 402R-00510

License Valid Through: 10/08/2017

This license is conditioned upon Local Authority approval, pursuant to section 12-43.4-304(1) C.R.S.

This conditional license is issued subject to the laws of the State of Colorado and especially under the provisions of Title 12, Article 43.4, as amended. A licensee shall not exercise any of the rights or privileges of this license until such time as all such Medical Marijuana and Medical Marijuana-Infused Product are fully transferred and declared in the inventory tracking system as Retail Marijuana and Retail Marijuana Product, pursuant to Rule R211 & R309. This conditional license is nontransferable and shall be conspicuously posted in the place above described. This conditional license is only valid through the expiration date shown above. Any questions concerning this conditional license should be addressed to: Colorado Marijuana Enforcement Division, 455 Sherman Street, Suite 390, Denver, CO 80203. In testimony whereof, I have hereunto set my hand.

[Signatures]
Jared Burack
Division Director

Barbara Brohl, Executive Director
**CITY AND COUNTY OF DENVER**  
DEPARTMENT OF EXCISE AND LICENSES  
201 W. COLFAKX AVE DEPT #208  
DENVER, COLORADO 80202  
TELEPHONE: (720) 865-2740

**BUSINESS - PROFESSIONAL LICENSE**  
POST IN CONSPICUOUS PLACE

**BUSINESS FILE NO.:** 2015-BFN-0008479  
**STATE LIC NO.:** 402R-00510  
**OP:** LM  
**ISSUE DATE:** 11/29/2016  
**EXPIRES:** 12/07/2017

SIMPLY PURE COLORADO, LLC  
SIMPLY PURE  
2000 W 32ND AVE  
DENVER, CO 80211

<table>
<thead>
<tr>
<th>LICENSE</th>
<th>LIC FEE</th>
<th>APP FEE</th>
<th>DATE PAID</th>
<th>FUND/ORG</th>
<th>REVENUE</th>
</tr>
</thead>
<tbody>
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<td>RMS License Fee</td>
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<td>$0.00</td>
<td>11/29/2016</td>
<td>01010-4001100</td>
<td>354920</td>
</tr>
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</table>

**COMMENTS**

IT IS THE LICENSEE'S RESPONSIBILITY TO RENEW PRIOR TO THE EXPIRATION DATE, IN ORDER TO AVOID PENALTY OR REAPPLICATION FEES AND ADDITIONAL INSPECTIONS. THIS LICENSE COVERS ONLY THOSE ACTIVITIES LISTED. COMPLIANCE WITH ARTICLE IV OF CHAPTER 28 D.R.M.C. IS A CONDITION OF THIS PERMIT.

Ashley Kibby  
Director, Excise and Licenses

Brenda Johnson  
Chief Financial Officer
**Licensee Details**

**Demographic Information**

**Name:** CLAYSTONE CONSULTING INC

**Address Information**

- **Street:** 3945 East 50th Avenue
- **City, State, Zip:** Denver CO 80216
- **County:** Denver

**License Information**

- **DBA:** Mile High MIPS
- **Type:** Infused Product Manufacturer
- **Lic #:** 404-00041
- **Status:** Voluntary Surrender
- **Expiration Date:** 1/26/2016

**Linked License Information**

- **Licensee:** Barnett, William Allen
  - **License Type:** Associated Key - Resident
  - **License #:** M21989
  - **License Status:** Voluntary Surrender

- **Licensee:** Dilger, Wayne Eugene
  - **License Type:** Associated Key - Resident
  - **License #:** M21993
  - **License Status:** Voluntary Surrender

- **Licensee:** Durrah, Scott Alan
  - **License Type:** Associated Key - Resident
  - **License #:** M00264
  - **License Status:** Withdrawn

- **Licensee:** Gennett, Lauren
  - **License Type:** Associated Key - Resident
  - **License #:** M00266
  - **License Status:** Withdrawn

- **Licensee:** James, Wanda Lee
  - **License Type:** Associated Key - Resident
  - **License #:** M00265
  - **License Status:** Withdrawn

- **Licensee:** Owens, Robert Matthew
  - **License Type:** Associated Key - Resident
  - **License #:** M22002
<table>
<thead>
<tr>
<th><strong>License Status</strong></th>
<th>Voluntary Surrender</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Licensee</strong></td>
<td>Tenney, John Richard, Jr</td>
</tr>
<tr>
<td><strong>License Type</strong></td>
<td>Associated Key - Resident</td>
</tr>
<tr>
<td><strong>License #</strong></td>
<td>M21997</td>
</tr>
<tr>
<td><strong>License Status</strong></td>
<td>Voluntary Surrender</td>
</tr>
</tbody>
</table>
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.
### 1O 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:

OPC Cultivation, LLC

---

**Indicate which (if any) of the following additional criteria apply:**

- [ ] I certify that the principal place of business and headquarters of this organization is Ohio. (3796:2-1-03(C)(1)(a))

- [ ] 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))*

- [ ] 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:**

[Signature]

**Date:**

June 22, 2017

---

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

[Signature]

Date

June 22, 2017

Printed Name of Applicant

OPC Cultivation, LLC
*Note: All room number references (e.g. “Vegetative Room (143)” refer to the numbered rooms depicted on Ex. B to our Business Plan (pg. 15) and Ex. A to our Security Plan (pg. 28).

PART I: EXPERIENCE IN AGRICULTURE AND CULTIVATION

Applicant’s Cultivation Team will draw upon decades of horticultural experience in large-scale, commercial growing enterprises that span the horticultural spectrum including: medical marijuana, hydroponic vegetables and a broad array of soilless culture systems in floriculture. Drawing from this background, Applicant’s team will apply the proven technologies from these mature industries and, combined with their hands-on growing experience with medical marijuana, create an industry leading production facility for the Ohio medical marijuana industry. By combining best practices from modern horticulture, premium medical marijuana genetics and optimized medical marijuana growing techniques, our Cultivation Team will be prepared to scale production to safely and sustainably meet the needs of the patient base in Ohio. Applicant’s Cultivation Team consists of the employees and key strategic advisors listed below, as well as the 39 cultivation-specific full-time employees that Applicant intends to hire locally promptly after award of a provisional Level I cultivator license.

**Head of Horticulture:** Applicant’s Head of Horticulture has spent his entire career, nearly two decades, growing ornamental plants and vegetables in high-tech, controlled environment greenhouses and in large nurseries. He holds a B.S. degree in Horticulture from University 13 and holds a State J private-applicator’s license. Previously, he served as General Manager and Head Grower at a large commercial greenhouse in State J, where he was responsible for managing more than 85 employees and 25+ acres of greenhouse and outdoor production of a wide variety of flowering plants, vegetables and trees. Prior to that, he served for ten years as Head Grower with Company 4 (a 100+ acre high-tech greenhouse facility in City C), where he managed 50+ acres of greenhouse production and a staff of 35 growers. He supervised all aspects of seedling production, crop scheduling, wholesale production, pest management, and vegetative propagation. Head of Horticulture also managed the hiring, terminating, counseling, training, and scheduling of all greenhouse staff. He is intimately familiar with growing conditions in State J, under the specific type of Venlo greenhouse structure that Applicant has designed, and he is well versed in the Priva environmental control systems that will automate certain aspects of facility operations. Head of Horticulture reports to the COO and is responsible for supervising all phases of cultivation operations and is responsible for recruiting, hiring, training and managing all cultivation personnel. Head of Horticulture will be responsible for annual cultivation budget planning, execution, and will work closely with the processing, manufacturing and quality assurance teams to oversee adherence to and revision of all cultivation SOPs and other operations essential to achieving Applicant’s ongoing observance of Good Agricultural Practices (GAP) and Good Handling Practices (GHP). Head of Horticulture will also work closely with the General Counsel and Compliance Director (who is outside of the COO reporting stream and reports directly to the CEO) on all matters related to regulatory compliance with Department regarding production, quality control, maintenance, receiving, and shipping.

In order to provide Head of Horticulture with a robust support system, Applicant recruited the best minds in high-tech greenhouse design/build and in commercial marijuana cultivation and operations. Applicant’s initial Cultivation Team will also include in-depth consulting and advisory services from Cultivation Firm, Vertical Integration Advisor & Diversity Officer, and MMJ Operations Expert, each of whom bring deep and varied experiences in commercial cultivation, both within legal medical marijuana markets and traditional horticulture, and the operation and ownership of a vertically integrated medical marijuana facility.
**Cultivation Firm:** Cultivation Firm is owned and operated by two degreed horticulturalists and plant pathologists, respectively, who have collectively managed more than 3,000,000 square feet in agriculture projects throughout the country, including Grower 2 serving as the Head Grower of a 25,000 square foot, cutting-edge medical marijuana greenhouse in State L. In addition, Cultivation Firm has turned around a failing hydroponic vegetable greenhouse company that was losing $100,000 a month by revolutionizing their production techniques. Within six months, net margins were above 25%, and within three years that company has replicated the model that the Cultivation Firm recommended and used it to build over 500,000 square feet of greenhouse space in multiple states nationwide.

Grower 1 holds a degree in Plant Pathology and Entomology from University 8 and has spent over 15 years growing plants, designing greenhouse systems and managing commercial-scale cultivation operations. Prior to co-founding Cultivation Firm with Grower 2, Grower 1 spent four years as the Director of Agriculture for Company 3, managing head growers, designing cultivation facilities, hiring and training staff, developing standard operating procedures and writing operational plans. Grower 1 co-founded Cultivation Firm with Grower 2. For eight years, Grower 1 served as Head Grower of Company 4, where he actively managed and oversaw 30+ acres of expansion of a 100+ acre high-tech greenhouse horticulture facility located in State J. Managing a team of 5 Grower Supervisors (who in turn managed 17 Section Growers who oversaw the work of 100+ hourly employees) and overseeing the cultivation of wide variety of ornamental pot crops, bedding plants and starter plants. During his tenure at Company 4, sales increased 35%, which equated to $35 million of additional revenue. Prior to joining Company 3, Grower 1 was General Manager with Company 17, where he was responsible for 3+ acres of hydroponic lettuce production. Company 17 is a worker-owned cooperative that was formed to create an economic breakthrough in City D by providing workers with living-wage jobs and a pathway to ownership and economic inclusion. Grower 1 also served as Head Grower of a 13 acre hydroponic tomato greenhouse in City R. Grower 2 holds a degree in Horticulture from University 7, where he studied greenhouse production. Prior to working with Applicant, Grower 2 was the Head Grower of a 25,000 square foot, cutting-edge medical marijuana greenhouse in State L. There, he was responsible for overseeing the successful construction, start-up and operations of the facility for over two years. Prior to that, Grower 2 served for two years Operations Manager of Company 3, where he was responsible for research and development projects, as well as the cultivation of tomatoes, herbs and lettuces on over 400,000 square feet of state-of-the-art greenhouse facilities. Company 3 is the world’s leading urban farming company, providing commercial scale production of hydroponic tomatoes and baby greens grown in close proximity to large markets in order to reduce the environmental footprint of food while boosting safety. Prior to that, Grower 2 spent four years serving as the Propagation Manager of a 700+ acre ornamental plant nursery located in City B, where he was primarily responsible for 30+ employees and propagating millions of plants per year across 30 acres of greenhouse structures. In a subsequent role, Grower 2 was also responsible for consulting and selling grow supplies, such as seeds, fertilizer, greenhouse structures and starter plants, to hundreds of ornamental greenhouse growers across the United States. Both Grower 2 and Grower 1 have served in an advisory and consulting capacity during Applicant’s facility design process, and will remain key, exclusive consultants to Applicant’s operations and Cultivation Teams post-licensure, to assist Applicant in managing the facility buildout, identifying and hiring candidates for our Cultivation Team, overseeing the acquisition of genetics and the first harvest cycle to ensure a smooth launch to the business.

**Vertically Integrated Advisors:** Vertical Integration Advisor & Diversity Officer will support Applicant’s Cultivation Team by lending more than six years of business ownership and operative experience within the regulated medical cannabis industry. Her experience will complement that of our Cultivation Firm and will be instrumental as we aim to build and open our proposed facility within six months of provisional licensure. Further, MMJ Operations Expert has 1.5 years of experience serving as the Director of Operations of Company 10, a vertically integrated medical and recreational marijuana...
Consultant (discussed above), will eventually allow Applicant to benchmark, monitor and improve its environmental footprint in this category.

**Suppliers:** Our cultivation plan calls for utilization of an organic grow medium called coconut coir, which is popular with many medicinal marijuana growers across the country. The medium is produced by Waste Farmers’ Batch:64, a certified B Corp, which seeks “solutions inspired by natural systems, human potential, and intuitive imagination with the intention of enhancing the biosphere, local communities, and one’s authentic life.” Applicant views Waste Farmers as a model supplier, which demonstrates the complete integration of environmental and social priorities into its business model. Applicant is also in process of obtaining B Corp certification.

**PART VI(A): STAFFING AND TRAINING**

Before a new position can be added, the Manager looking to add the position must receive approval from their Supervisor and from the HR Director. The Personnel Requisition Form will ensure that each new role is justified and that the position will be posted internally, within the company, and within the community, prior to looking elsewhere. This form will also help our HR Director in managing new roles and looking for problematic trends such as excessive hiring or hiring from outside the organization and outside the community. Once approval for the new personnel member has been granted, the employee responsible for hiring must post the associated job description in the employee breakroom, affording internal employees the opportunity to view the open role and to discuss possible career advancement with his/her Manager. If qualified candidates are identified within the company, those employees will be interviewed first. If a qualified candidate is not identified, or not selected during the interview, the hiring employee will then post the position within the community.

**Identifying and Screening Candidates**

**Onboarding and Training:** To ensure a safe and efficient operation, Applicant will require all team members to participate in both onboarding and ongoing training while employed by Applicant. Employees will participate in companywide trainings focused on topics that impact all employees, regardless of position. Employees will also participate in ‘Functional Training,’ whereby the employee will be trained on the specific functions of his/her role within the cultivation facility. While not an exhaustive list, here are several trainings that will be required by all employees:

**Companywide Trainings:** The following trainings are required by all employees, including those who work in administrative positions that do not handle medical marijuana. Trainings will be co-developed, where applicable, by third-party organizations such as local law enforcement, or a certified OSHA Trainer.

<table>
<thead>
<tr>
<th>Training Topic</th>
<th>Companywide Training Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee Handbook Training</td>
<td>A requirement within two weeks of joining the Company and will cover compliance, laws governing the program, employee benefits, and employer policies and procedures.</td>
</tr>
<tr>
<td>Fire Safety Training</td>
<td>Addresses the roles of employees as it pertains to understanding of the various threats and hazards that are most likely to cause a fire within the facility, as advised by OSHA’s Fire Safety in the Workplace curriculum. Fire Safety Prevention, Action and Notification is described in detail within our response to Part IV of Security Plan, Emergency Notification.</td>
</tr>
<tr>
<td>Chemical Spill and Safe Handling</td>
<td>Addresses the roles of employees pertaining to chemical spills, such as preventative measures, MSDS sheets, and the four most common events resulting in a chemical</td>
</tr>
<tr>
<td>Training</td>
<td>spilling including chemical: storage, transport, handling, and disposal. Action and Notification is described in detail within our response to Part IV of Security Plan, Emergency Notification.</td>
</tr>
<tr>
<td>---------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Medical Emergency Training</td>
<td>All employees will be trained to identify medical emergencies and to respond accordingly. Response includes notifying proper members of Management as well as Medical Emergency First Responders.</td>
</tr>
<tr>
<td>Companywide Security and Armed Robbery Training</td>
<td>While Security Agents will participate in job-specific security training, Applicant feels strongly that all team members should understand the security measures in place at the facility and each employee’s response in the event of a security event including, but not limited to, armed robbery.</td>
</tr>
<tr>
<td>Recordkeeping Training</td>
<td>A one (1) day recordkeeping training will ensure that all employees understand the current regulations governing Record Keeping and how to accurately, and securely, store records in both physical and digital form.</td>
</tr>
<tr>
<td>Sexual Harassment Training</td>
<td>This training will be held annually so: (1) all employees understand Applicant’s commitment to building a safe workplace and it’s zero tolerance policy and; (2) so all employees will understand what sexual harassment looks and sounds like to that this type of harassment can be detected and addressed immediately.</td>
</tr>
<tr>
<td>Affirmative Action Training</td>
<td>Affirmative Action Training will be held on site for all team members. This training is designed to educate employees on the importance of diversity and the importance of treating all employees with respect. Applicant believes that when diversity is celebrated, all employees can feel more included and safe within the work environment.</td>
</tr>
<tr>
<td>Conflict Management Training</td>
<td>This is a mandatory training for all management level employees so that they may have the skills needed to resolve conflicts in the workplace, resulting in a safer environment for all employees.</td>
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</tbody>
</table>

**Functional Training:** In addition to the companywide trainings, Functional Trainings are required by all members of the Cultivation Team within five (5) business days of an employee’s start date. Trainings may be held on an individual or group basis, depending on the subject matter. Trainings include:

<table>
<thead>
<tr>
<th>Training Topic</th>
<th>Functional Training Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Security Training</td>
<td>Extensive training will be required for all security agents. Training will involve classroom and hands-on training, and participants will need to pass an assessment before being formally on-boarded as a security agent.</td>
</tr>
<tr>
<td>Cultivation Training</td>
<td>All staff involved in the daily operations at the cultivation facility will be trained on facility maintenance, health and safety, proper handling techniques for raw materials, business security, and cross-contamination prevention. Each sector will have expansive, in-depth training that focuses on their particular departmental responsibilities.</td>
</tr>
<tr>
<td>Sanitation Training</td>
<td>Maintaining a clean facility and adhering to strict sanitation requirements is critically important and will be thoroughly reviewed during training.</td>
</tr>
</tbody>
</table>
Secure Transport Training

STA’s will be trained to securely and compliantly, pursuant to Company and Department rules, deliver medical marijuana including proper container setup, secure loading and transport, vigilance and safety.

Diversion Training

Employees will be trained to recognize signs of diversion by both internal employees and external threats, such as unusual behavior among colleagues, visitors or vendors, or an employee consistently trying to work alone or gain access to areas alone, violating the two-person facility rule. Other signs may include, but are not limited to: employees showcasing a sudden change in financial circumstances; employees removing items from the facility including medical marijuana; employees frequently leaving their workstation to use the restroom or visit the locker room; employees candidly expressing interest in theft or asking frequent questions about the facility’s security measures.

Mock Recall Training

Applicant will conduct a mock recall annually, or whenever there are significant changes to the recall plan or Recall Team personnel. For purposes of the mock recall, the facility will select a product that has reached an end patient and will practice tracing the product from the seed to consumer sale level. The Recall Management Team (RMT) will oversee the training and will verify that all employees understand the importance of swift action and communication with those affected.

PART VI(B): (OPTIONAL) DIVERSE HIRING AND EDUCATION PLAN

Applicant has developed a Diversity Plan to define and track progress towards company wide diversity goals, illustrating our commitment to outreach and connecting with diverse people. We will strive to retain diverse employees by fostering a safe, inclusive and welcoming environment. Our site has been designed to meet or exceed all ADA Standards for Accessibility, and additional accommodations will be made for employees who require them. Vertically Integrated MMJ Advisor & Diversity Officer will support the Applicant’s process of implementing this diversity plan and measuring the Company’s progress towards meeting diversity related goals.

**Goal 1: Engage Diverse Suppliers:** Applicant will train all employees responsible for making purchasing decisions within the Company to identify and prioritize businesses certified by the State of Ohio as diverse businesses including: Minority Business Enterprise (MBE); Woman Business Enterprise (WBE); Veteran Business Enterprise (VBE); Service-disabled Veteran Employees (SDVBE); Disabled Veteran Business Enterprises (DVBE); and Disability Owned Business Enterprise (DOBE). Applicant will maintain a list of Preferred Vendors, comprised of diverse suppliers and vendors, within the front office and will make this list available to employees. While the Company intends to hire the best suppliers and vendors for the business’ needs, all else equal, preference will be given to the aforementioned groups.

**Goal 2: Inclusive Hiring and Recruiting:** Applicant is committed to recruiting purposefully to attract a diverse employee base. Applicant plans to partner with Business 2, a women-owned, recruiting firm that is well-known for their commitment to diversity. We will actively reach out to diverse communities and professional organizations as part of our long-term recruiting goals. Applicant will connect with Organization 10 to notify the Department of open roles and with Veteran-facing events where applicable. Applicant will connect with Ohio Colleges and Universities, and has already had preliminary conversations with University 9, located in our immediate community, to identify talented students approaching graduation, with an emphasis on diverse candidates. The HR Director will lead the
following actions, ensuring that hiring and recruitment is always based on a candidate’s qualifications:

1. Job descriptions, pre-employment forms, and all questions are written in accordance with the Company’s Affirmative Action Plan and all federal and state laws;
2. Evaluate Manager selection and hiring processes to ensure that each individual responsible for hiring has been trained on interviewing techniques and follows the Company’s Affirmative Action Plan, as it relates to unbiased selection of a candidate;
3. Evaluating the Company’s practices as they relate to recruitment of diverse candidates. This evaluation may include, but is not limited to: Ensuring that the phrase “Equal Opportunity/Affirmative Action Employer” is present in all advertisements and job postings, within all job descriptions and within the job application; sending job postings to all local partners, especially those in diverse areas, or those who frequently interact with diverse audiences; actively recruiting from local secondary schools, junior colleges, technical schools, colleges and universities, especially those with high minority and female enrollment; stressing the importance of diversity to all partners and agencies contracted to assist Applicant with recruitment related work.

**Goal 3: Cultivate an inclusive, desirable environment of high-performing, diverse teams:** Cultivating a diverse environment means that each and every team member treats each other with respect and understands the power of diversity. During training, employees will review Applicant’s zero tolerance policy as it relates to acts of discrimination, harassment, or violence toward any member of our team. Any employee that is found to be in violation of our strict diversity policies is subject to disciplinary action up to and including termination. Each employee will also be required to complete a comprehensive Affirmative Action Training within sixty (60) days of hire; subsequent Affirmative Action Training events may be required on an ongoing basis. Managers and Supervisors will undergo additional Conflict Resolution Training, designed to help them manage difficult conversations related to diversity. Additionally, the HR Director, and other key employees, will participate in a multi-day, Ohio-based Diversity Certification Program so that s/he will be certified to design and oversee diversity and inclusion programs within our organization.

**Goal 5: Measuring and Communicating Diversity Goals:** Management will meet quarterly to review records and the corresponding diversity and inclusion scorecard, managed by the HR Director. Minutes will be taken during each meeting detailing meeting outcomes, follow up action items, and a summary and will be reviewed prior to the next quarterly meeting ensuring that progress is made toward all diversity related goals and initiatives. Applicant will conduct bi-annual, 3rd party reviews as part of maintaining its B-Corp status. Results will be reviewed twice per year, and solutions will be developed to help us in further refining objectives. Organization 12 will also conduct a bi-annual review of personnel activities to ensure nondiscrimination and EEO for all individuals without regard to race, color, sex, sexual orientation, gender identity, religion, or national origin. The review will evaluate all recruitment related advertisements/job application forms, process of hiring, promoting, awarding bonuses, and conducting layoffs; rates of pay, and all other forms of compensation, issued to personnel; job assignments, classifications, organizational charts and job descriptions; and absenteeism records, including those pertaining to sick or bereavement leave.
plant clones, pruning crops, trellising crops and all other practices will lead to some degree of plant waste. In addition, the natural senescence of leaves will sporadically occur meaning that soil surfaces, table surfaces and floors will be checked and cleaned daily according to operational checklists.

**Multi-Purpose Head House Area:** Transplanting, re-spacing of crops, and harvesting will all occur in this area and each of these processes will generate plant waste either in the form of entire plants that have been culled, or from leaf and stem debris that is purposefully removed.

**Product Drying Rooms:** While these rooms are used for drying of plant material, there will inevitably be product that falls off of drying racks. When plant material makes contact with the floor the plant material is rendered waste at that time. Any plant material with visible mold or other issues will also be disposed of immediately.

**Trim Room:** During the trimming process, plant waste will be generated as stems and leaves, which do not contain trichomes and therefore do not have medicinal value, are discarded.

**Packaging Areas:** Any plant material that comes in contact with the floor, an unsanitary surface or is deemed unsellable for any reason will be discarded.

**Recalls/Returns/Expired/Failed Test Product:** Product that either returns to the facility due to a recall or material that does not leave the facility due to a recall will be deemed plant waste. Plant material involved in a recall will not be disposed of until consent is granted by the Department.

**Waste Collection**

All plant waste material will be collected in the same manner, regardless of the room or department generating the waste. Each of the areas described above will have green, clearly labeled, 55 gallon waste containers. These containers, which will have ‘Marijuana Plant Waste Only’ labels on both the sides and the lid, will have trash bags liners in them and will be secured with a lid. There are three scenarios where the waste bins will be collected for disposal:

1. At the end of each day, a type 1 key employee will use a checklist to ensure that all medical marijuana plant waste containers throughout the facility are collected. If the bin contains any waste, the liner will be removed from the bin, sealed and carried to the nearest Waste Consolidation Zone (either 141 or 147). The following information will be recorded in the Waste Disposal Log: the name and badge number of the individual who collected the waste; the date and time the waste was collected; the room from which the waste was collected; the total weight of the waste material; and the reason for waste disposal. The bag(s) of waste will then be placed into a large, lockable, rolling cart for disposal once all waste has been collected. At this time, a fresh liner will replace those previously emptied in each room, all lids will be re-secured, and the containers will be ready for use the following day.

2. Some processes, such as harvesting and pruning, will result in large amounts of plant waste and containers will fill up before the end of the day. When this occurs, a type 1 key employee will remove the liner from the bin, seal it and carry it to the nearest Waste Consolidation Zone (either 141 or 147). The waste handling will be recorded and will include all aforementioned details about the waste. The bag of waste will then be placed into a large, lockable, rolling cart for later disposal after all waste has been collected. At this time, a fresh liner will be taken to the waste container that was previously emptied, the lid will be re-secured and the bin will be ready for continued use.

3. During the trim process, large amounts of plant waste will be generated and waste containers may fill up before the end of the day. Because plant waste material from the trimming process needs to be recorded in the inventory tracking system (ITS), the waste containers will sit on scales that have been tared for the weight of the waste container. When the container is ¾ full or when the trim crew is switching from one strain to the next, a type 1 key employee will record
the following information on the Trim Plant Waste Log: the name and badge number of the employee who collected the waste; the date and time; the weight and strain name of the material; and the harvest date of the material being trimmed. A type 1 key employee will then remove the liner from the bin, seal it and carry it to the Waste Holding Zone, record all of the aforementioned details, and replace the liner and prepare the bin for continued use.

**Waste Disposal**

At the end of each business day, a type 1 key employee will retrieve all plant material waste from the Waste Consolidation Zones and transport it to the Waste Disposal Zone (148), a designated destruction area identified in all cultivator plans and specifications submitted to the department. Once in this secured area, the employee will process all plant material waste through a Vermeer BC 600xl chipper/shredder that feeds the material into a dumpster. Once all material has been through the machine, the employee will mix the plant material with at least 51% soil/non-marijuana waste in accordance with 3796:2-2-03(B).

The employee will then lock the lid of the dumpster, return the rolling cart to the Waste Consolidation Zones (147, 141) and record the following information in regards to the waste that they disposed: the date and time of disposal; manner of disposal; volume and weight of the approved solid waste media used to render the medical marijuana unusable; unique identification codes associated with the medical marijuana scheduled for destruction; reasoning for and description of the disposal; signature of the type 1 key employee overseeing the disposal of the medical marijuana; and, if the medical marijuana waste for disposal contains plant material that was prepared for sale to a licensed dispensary or processor, the batch number, strain, volume, and weight of the plant material being disposed. A locally contracted waste handling company will pick up the plant waste dumpster on a regular schedule and take it to their facility where all material will be composted and re-used in the local community. All disposal and waste removal work will be performed under video surveillance from the time the destruction begins to when it is placed in a locked dumpster or other approved, locked container and removed from the facility.

**Non-Medical Marijuana Waste Process**

Applicant will dispose of growing media, recyclable materials, non-medical marijuana trash, liquid waste and hazardous materials using the following waste management processes:

**Growing Media:** Applicant will use a blend of coco coir and perlite as its growing media. Large amounts of used growing media (approximately 1 truckload per week) will be generated during the harvest of mature plants and also any time that plants are culled or killed for any reason. Regardless of the reason for the disposal of the plant, the entire plant will be cut directly at the soil line with a pair of large loppers. The remaining root ball and soil will be placed in a self-dumping hopper. When full, a Type 1 Key Employee will take the hopper outdoors and use a forklift to transport it to the Waste Disposal Zone (148). The growing media will be stored in this secure area until it is used to either: (a) dilute plant waste in the process described above; or (b) collect it for pickup by Company 15, as part of Applicant’s composting partnership with community members of Applicant’s Ag-Tech Collaborative.

**Recyclable Materials:** Select rooms in the facility will contain blue ‘Recycling Only’ containers to collect paper, plastics and other recyclable materials. There will be a dedicated and locked recycling dumpster located outside the facility that will hold these materials until removal.

**Trash:** Select rooms in the facility will contain black ‘Trash Only’ containers to collect all non-plant, non-recyclable, and non-hazardous waste. There will be a dedicated and locked trash dumpster located outside the facility that will hold these materials until removal.

**Liquid Waste:** Applicant’s cultivation facility will utilize a recirculating hydroponic system.
Following an irrigation, there will be runoff irrigation solution that is not taken up by the plants. This system will collect runoff and will treat it with an ozone disinfection system, adjusted for EC and pH, so the runoff may be reused in a subsequent irrigation event. Because all irrigation water will be recycled, the facility will be a zero run-off facility in terms of irrigation. In the event that there is a need to dispose of any nutrified irrigation water, Applicant will do so in a compliant manner by diluting the solution to lower the concentration of fertilizer and trucking it off-site to a facility that can dispose of the solution in a manner compliant with state and local guidelines. All water used for drinking, lavatories and cleaning the facility will be supplied from the municipal source and will be drained into the municipal sewer and wastewater systems. All liquid waste will be disposed of in accordance with state and local law.

_Hazardous Waste:_ Applicant will fully comply with all regulations with regards to the management, storage and disposal of hazardous waste to ensure the safety and health of all employees, clients and visitors. Hazardous waste is defined as any substance with chemical and/or biological properties that is no longer in use and that is potentially dangerous or harmful to human health or the environment if handled improperly. Hazardous waste will be stored in a locked ‘Hazardous Waste’ dumpster located outdoors at the facility and a local waste management service will be contracted to dispose of this material in a compliant fashion. Pesticide waste will, in accordance with 3796:2-2-03(E), be disposed of in compliance with all state and federal laws and regulations and Company policy.

**PART V: ADVERSE EVENTS AND RECALL PROCEDURES**

In accordance with 3796:2-1-02(B)(4)(f), Applicant has developed a Recall Plan and Procedure to handle adverse events including suspected contamination of medical marijuana; expired medical marijuana; non-compliant packaging or labeling; or a Department dictated recall. In the event that any medical marijuana from the cultivation facility is shown by testing or other means to be, or potentially be, defective or have a reasonable probability that its use will cause adverse health consequences, the facility will implement its Recall Plan.

The Recall Management Team (RMT) is responsible for carrying out the Recall Plan and for assessing and responding to complaints; identifying medical marijuana that should be included in the recall; notifying the licensed facilities who have purchased the medical marijuana in concern; processing refunds or issuing replacement medical marijuana; quarantining impacted marijuana internally; retrieving and quarantining medical marijuana that was previously sold from the facility; following Department instructions pertaining to destruction of product; tracking and documenting all related actions taken during the recall event; maintaining accurate inventory; and managing all outbound communication from the cultivation facility to affected entities, license holders and the Department. The RMT consists of the Head of Horticulture, General Counsel/Compliance Director and the Packaging/Labeling Lead, as well as relevant staff who will support the process. The Recall Plan is as follows:

1. **Assessing Complaints:** All products distributed from the cultivation facility will be accompanied by a toll free phone number, found on the packaging, that will allow anyone who has received the medical marijuana to contact the cultivation facility should any serious adverse events occur or questions arise. Complaints may also be shared via a contact form on Applicant’s website, and each complaint will be responded to within 24 hours of receipt. In the event a complaint is submitted, a member of the RMT will immediately review the batch and lot number of the product in question and, if deemed necessary, will send a sample to a third party testing laboratory to determine if the product meets both facility and Department quality control guidelines. A sample of the product in question will also be retained for future examination by the Department. The RMT will review product logs for the product in question to look for any deviations from cultivation procedures and will discuss the product in question as a team. If the product is found to meet facility and Department guidelines, the complaint will be recorded and stored in accordance with Applicant’s Record Keeping Plan and the individual who
submitted the complaint will be notified by a member of the RMT. Upon discovery that the batch does not meet required guidelines, the RMT will initiate the recall process, further described below.

2. **Identifying Affected Product, Notification and Refunds:** When the Recall Plan is initiated the RMT will first notify the Department by phone within 24 hours. The RMT will also notify the Department by email to ensure that the notification is received by a Department representative and to record the notification. The RMT will continue to update the Department by phone at a frequency dictated by the Department and will send e-mail notifications to serve as a record of each notification to the Department.

The RMT will then begin identifying the location of all medical marijuana involved in the complaint. The RMT will determine the recall window and will decide if the incident is isolated or if other batches may be effected. The RMT will utilize third-party laboratory testing to determine if other batches and lots are impacted and, if others are identified, the newly affected products will be added to the Recall Plan. The RMT will immediately quarantine any affected product that still remains in the cultivation facility and any pending transports of affected product will be canceled and the licensed recipients will be offered an alternative product or refund. The RMT will utilize the inventory tracking system (ITS) to retrieve a list of all licensed entities that received the recalled product.

Once the list of affected license holders is developed, the RMT will contact each licensed entity to inform them about the recall circumstances and to relay directions on how to return the recalled product to Applicant’s cultivation facility. All telephone notifications will also be communicated by e-mail notification to ensure that the facility impacted by the recall has clear instructions on returning the recalled product and that there is record of the communication. One member of the RMT will be solely responsible for tracking the actions taken by Applicant as well as actions and responses taken by impacted license holders. In the event that a license holder cannot be reached by phone or e-mail, the RMT will notify the Department immediately.

In accordance with 3796:2-2-02(A)(2)(e), all product distributed from the cultivation facility will have a label affixed to the product with the batch’s unique identification number. Applicant’s ITS will track product from “seed-to-sale,” allowing the RMT to quickly identify the location of all impacted product, both within and outside of the cultivation facility. The RMT will share batch information with all affected licensees so they may quickly and efficiently identify product that should be returned to the cultivation facility. Licensed facilities will utilize the state’s seed-to-sale tracking system to transfer impacted product back to the cultivation facility, allowing for a detailed record of all product transfers and change-in-custody of the product. Applicant will work with each affected licensee to schedule a pickup date for recalled product. Until the scheduled retrieval date, the licensed entity will be instructed to quarantine affected product in a sealed bin labeled ‘QUARANTINE’ so the product does not contaminate surrounding products or is not accidentally released to consumers.

The RMT will also prepare and distribute a Notice of Recall Letter to licensed dispensaries who have already sold contaminated product to consumers. The Notice of Recall Letter will include all relevant product identification information and the date range in question. The Letter will also explain the steps consumers can take to be refunded for product already consumed or the steps consumers may take to return the product to the licensed Dispensary. If recalled products are returned by consumers, the Dispensary will be responsible for returning product to Applicant’s cultivation facility for proper destruction. The RMT will ensure that recipients post the Letter in a highly visible area within the dispensary and that consumers are contacted by telephone and written letter. Consumers who return product will be refunded by the Dispensary and the Dispensary will be able to receive reimbursement from Applicant for all product returned by both consumers and by the

*2C Quality Assurance Plan - 23*
3. **Product Retrieval and Quarantine:** All product identified for recall will be quarantined immediately in the cultivation facility. Product in quarantine will be labeled with a red ‘QUARANTINE’ label affixed to the product container on four (4) sides. The label will also include the product’s batch identification number, the amount of product being stored, the reason for quarantine, and the name and employee number for the personnel member who placed the product in quarantine. Product will be stored carefully and away from other saleable product to prevent against cross-contamination. Product will be stored in a locked, restricted access area. Product returned by licensed entities will be transferred back to the facility using the state’s seed-to-sale system. Applicant will utilize their secure transport vehicles and agents to retrieve affected products and will return them to the facility. When contaminated product arrives back to the cultivation facility, it will be immediately recorded within the inventory tracking system and will be transferred immediately to the restricted access storage area where all quarantined product is stored.

4. **Destruction:** Applicant will not destroy recalled product until given authorization by the Department. Applicant acknowledges that the Department may require additional testing of the product before it is formally destroyed. Upon receiving approval to destroy the recalled product, the RMT will record the name and quantity of all product involved and will destroy the product in accordance with the facility’s waste disposal process (described in Part IV of this response) and Chapter 3796:2-2-03.

5. **Records:** Applicant will document all complaints triggering or involved in the recall in accordance with the Record Keeping Plan. All notifications and communications to the public, licensees, the Department and internal employees will be stored both physically and digitally to demonstrate Applicant’s efforts to notify and communicate effectively with those impacted by the events of the recall.

6. **Process Review:** Following a recall, the RMT will review the Recall Plan to evaluate the process and determine if there are areas to improve. The RMT will consider the time needed to retrieve all impacted product, the ease of identifying impacted product, Applicant’s notification actions, and the reason the recall occurred. Should improvements be needed, the RMT will make changes to the written Recall Plan and will conduct trainings, as necessary, for team members involved in the recall process. The RMT will also request feedback from impacted entities to identify possible areas of improvement and to assess the overall effectiveness of the recall.

**PART VI(A): RECORD KEEPING AND REGULATORY COMPLIANCE**

Applicant will implement aligned Record Keeping and Inventory Control Plans designed to protect important and confidential business records while ensuring that Applicant is in full compliance with Chapter 3796:2-2-08. Applicant will designate key employees to manage the record keeping process. Each employee involved in the record keeping process will participate in extensive training which will emphasize the importance of maintaining record confidentiality and integrity. Records will be maintained for a period of five years, both physically and electronically. Records will be organized and detailed in accordance with the Administrative Code and will be made available to the Department on request.

**Record Keeping Team**

Applicant’s record keeping process will be managed by a Record Keeping Team (RT), comprised of several key employees who have completed extensive record keeping training. The RT is collectively responsible for managing physical and electronic records, facilitating access to records, and aligning company records with the inventory tracking system. The RT is also responsible for conducting record review audits, monitoring and updating the record keeping policy and corresponding procedures,
and locating and presenting records requested by the Department. The RT will conduct a record reconciliation at the end of each month, and will conduct a more comprehensive review at the end of each quarter to determine if record keeping procedures need to be revised or adjusted. The record keeping team includes:

<table>
<thead>
<tr>
<th>Employee</th>
<th>Record Keeping Team (RT) Role Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General Counsel / Compliance Director</strong></td>
<td>The General Counsel / Compliance Director will co-develop the record keeping system and will conduct scheduled and random audits to ensure companywide adherence to the record keeping plan. The General Counsel / Compliance Director will have a hands-on role in ensuring that the record keeping system is organized at all times and will serve as a point of contact for all RT members.</td>
</tr>
<tr>
<td><strong>Head of Horticulture</strong></td>
<td>The Head of Horticulture is responsible for coordinating all cultivation related records and for providing these to the Accountant/Bookkeeper. The Head of Horticulture will work with the Compliance Director to ensure that all records needed within the cultivation facility are generated and secured for retrieval.</td>
</tr>
<tr>
<td><strong>Chief Operating Officer (COO)</strong></td>
<td>The COO and General Counsel / Compliance Director will oversee the development and implementation of the record keeping policies and procedures. Each quarter, the COO will review the RT's performance, will discuss record keeping issues with relevant employees, and will, in conjunction with the General Counsel / Compliance Director, implement new record keeping related training programs, policies, and procedures as needed. During this review, the COO will evaluate Applicant’s record keeping operations to make sure the team is operating in accordance with all department rules, and State laws and regulations.</td>
</tr>
<tr>
<td><strong>Security Director (SD)</strong></td>
<td>Responsible for maintaining all records pertaining to security measures, equipment and transports and for ensuring the security of the Security Command Post (106) and online electronic storage server. The SD will also ensure that records are provided to the Accountant/Bookkeeper and will be responsible for managing access to the Security Technology Room (112) and electronic storage server.</td>
</tr>
<tr>
<td><strong>HR Director</strong></td>
<td>The HR Director is responsible for maintaining all records pertaining to personnel, recruitment and staffing efforts, and company training. This person will ensure that records are provided to the Accountant/Bookkeeper.</td>
</tr>
<tr>
<td><strong>Accountant / Bookkeeper</strong></td>
<td>The Accountant/Bookkeeper will file records within the Secure Record Keeping Room (111) and will create electronic copies of each record. This person will be primarily responsible for collecting records from each department head and for organizing records within the Secure Record Keeping Room (111) and on the cloud-based server.</td>
</tr>
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</table>

**Record Procedures:**

The RT will maintain detailed records and will ensure seamless integration with the Inventory Tracking System. Records will be created and stored as follows:

2C Quality Assurance Plan - 25
STEP 1: All employees responsible for record keeping will complete record keeping training before being permitted to handle records. Record keeping training will continue on an on-going basis and will include scheduled and random record keeping process audits to ensure compliance and understanding. During training, employees will learn how to properly handle and protect company records from damage and from unauthorized access. Employees will not eat or drink in any Security Offices, or while handling records. Failure to comply with any of Applicant’s record keeping procedures will result in disciplinary action up to and including termination.

STEP 2: Records will be collected by the Director or Manager of each respective department. This individual will collect all physical records, ensuring that they are clearly labeled and dated, and deliver these records to the Accountant/Bookkeeper.

STEP 3: The Accountant/Bookkeeper will begin the record storage process by creating electronic copies of physical records by scanning the physical record to a company issued computer and properly naming and dating the file. Computers used during this process will utilize anti-virus/malware software, and will undergo a daily security scan. All electronic records will be created by using a company issued computer and company issued login information, allowing the Security Director to track and monitor all employees who have access to secure records and confidential information. Employees will be advised to create a password containing both upper and lowercase letters, numbers and special characters, and will need to change their password every three (3) months, or more frequently, as dictated by the Security Director. Before uploading the record to the company’s cloud-based storage system, the record will be encrypted using Applicant’s digital encryption system to prevent unauthorized access to records.

STEP 4: Some records will begin as electronic and will need to be printed and filed physically. Inventory records and accounting records, as examples, will be generated by Applicant’s inventory tracking system and automatically backed up to Applicant’s network storage infrastructure, allowing for real-time record creation. Applicant will identify a secure electronic record keeping system that, pursuant to 3796:2-2-08(B)(1): (1) guarantees the confidentiality of information stored; (2) provides safeguards against erasures and unauthorized changes in data once information is entered; (3) can place a litigation hold or record retention hold for the purposes of an investigation; and (4) can be reconstructed in the event of a computer malfunction or the accidental destruction of records. All emails sent using the company’s email server will be encrypted using key-based algorithms to protect confidential information. The information exchanged by email will also be uploaded to the electronic record system for secure keeping and easier retrieval.

STEP 5: Once the file has been created, the Accountant/Bookkeeper is responsible for filing physical copies of records within the Secure Record Keeping Room (111). Records are filed by department and are then filed either chronologically or alphabetically depending on the record type. For example, job applications and candidate resumes should be stored alphabetically within the Human Resources area of the Secure Record Keeping Room (111), while cultivation records should be filed chronologically by date for easier retrieval in the future. Secure Record Keeping Room (111) is a highly secure, Restricted Access Area, containing fireproof filing cabinets to protect all physical records. The office is under constant surveillance and access is limited to key employees within the company.

STEP 6: Records will be kept on site for a minimum period of five years. Each month, the Accountant/Bookkeeper will use the electronic records storage system to determine which records have reached their five year checkpoint and are ready to be destroyed. The Accountant/Bookkeeper will remove the expired records and will coordinate with a certified third-party document disposal company, to arrange for document pickup and destruction. Applicant has identified an State J-based document shredding company for this process and will rely on this company to retrieve, shred and recycle physical records five years old or more. Before a record is destroyed, the Compliance Director will ensure that the document is available electronically.

2C Quality Assurance Plan - 26
**Record Types and Records Storage**

In accordance with Chapter 3796:2-2-03, Applicant will maintain the following physical and digital records, in clear, legible format, at the cultivation facility for a period of five years. All records will be made available for inspection upon request. Record types include:

<table>
<thead>
<tr>
<th>Record Type</th>
<th>Record Storage Procedure</th>
</tr>
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<tbody>
<tr>
<td>Transportation Records</td>
<td>A Transportation Log (TL) will be generated each time medical marijuana is transported and will contain: names and address(es) of the entities sending and receiving the shipment; names and registration numbers of the registered employees transporting the medical marijuana and the products containing medical marijuana; license plate number and vehicle type that is involved in the transport; time of departure and estimated time of arrival; specific delivery route including street names and distances; total weight of the shipment and a description of each individual package included within the shipment; and the total number of individual packages. A copy of the TL will be provided to the medical marijuana entity receiving the products and the department, prior to close of business one day prior to transport and will also be imported into Applicant’s ITS in accordance with Chapter 3796:5-3-01 and 3796.07</td>
</tr>
<tr>
<td>Cultivation Records</td>
<td>Records to be kept within the cultivation department include: all forms and types of medical marijuana maintained by the Cultivation Team each day; records of all soil, fertilizers, pesticides and other chemicals applied to the plants or used in the process of cultivation in accordance with Chapter 3796:2-2-01(C), which requires the cultivator to record the name, amount, date and time of application, stage of cultivation process, date when the plants were transferred to flowering, United States EPA registration number, analysis of fertilizer applied and the application site, the plant’s unique identifier, size of the application area, name of the employee making the application; cultivation equipment purchases, manuals and maintenance logs; cultivation SOP’s and training materials; and all production records including planting, harvesting, curing, weighing, packaging and labeling.</td>
</tr>
<tr>
<td>Financial and Business Records</td>
<td>Business and financial records, including: bank statements and any canceled checks for all accounts related to the cultivator; journals and ledgers; supporting financial documentation; checks; invoices and vouchers; accounts receivable and accounts payable reports; profit and loss reports; accounting and tax records related to the cultivator and all investors in the facility; and any other financial accounts associated with the cultivation facility will be maintained in accordance with Chapter 3796:2-2-08(C). Financial records will reflect all transactions as well as the overall financial condition of the business, including contracts for any services performed or received as it pertains to the cultivator. All purchase invoices, bills of lading, manifests, sales records, copies of bills of sale, and all relevant supporting documents, including but not limited to: the items and/or services purchased, from whom the items were purchases, and the date of purchase.</td>
</tr>
<tr>
<td>Record Type</td>
<td>Details</td>
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</tr>
<tr>
<td>Disposal Records</td>
<td>Disposal records will be maintained for all medical marijuana destroyed, as outlined within Applicant’s Waste Disposal Plan. The record of destruction will include: the medical marijuana’s description, registered product and strain name, quantity, unique identification code associated with the medical marijuana scheduled for destruction, date of production, date and time of, and reason for, destruction. The type 1 key employee overseeing the disposal will be responsible for maintaining and making these records available and for recording his/her full name, employee ID and signature.</td>
</tr>
<tr>
<td>Records of Sale</td>
<td>Transactions will be recorded in Applicant’s ITS and record storage system at the end of each day. The record of sale will include: date and time of sale; product sold including the product’s weight, batch number, and variety; name of receiving licensed business, including the licensee’s state issued license number, receiving address and the payment amount received for the sale, in accordance with Chapter 3796:2-2-04.</td>
</tr>
<tr>
<td>Lab Sample and Testing</td>
<td>Will be maintained for each sample sent to independent testing laboratories in accordance with Chapter 3796:2-2-08(A)(4).</td>
</tr>
<tr>
<td>Security Records</td>
<td>In accordance with Chapter 3796:2-2-05, Applicant will maintain all security records including, but not limited to, security contractor information; security equipment purchases, installations and associated maintenance logs; security SOP’s; surveillance recordings; and all records of theft, loss or unaccountability of medical marijuana.</td>
</tr>
<tr>
<td>Human Resource and Employee Records</td>
<td>In accordance with Chapter 3796:2-2-08(D), HR Records include files pertaining to: employees and related performance records; the hiring of employees, including applications, documentation of verified references, and any other employee- or candidate-submitted materials; employee and company-wide training participation; payroll records; contractor agreements and payments; and workman’s compensation claims, unemployment claims, and corresponding investigations. A detailed employee log will be retained for each employee and will include: the employee’s name, address, phone number and emergency contact information; registration number and all related access credentials; date of hire; date of and reason for separation, if applicable; all training and education; any related disciplinary records and performance logs; and the employee’s salary, wages, executive compensation, bonuses, benefits, or items of value paid to the employee.</td>
</tr>
<tr>
<td>Diversity Records</td>
<td>Records pertaining to diversity include, but are not limited to: An applicant flow log for each applicant citing name, race, sex, date of application, job title, interview status, and action taken; summary data of applicant flow by identifying, at least, total applicants, total minority applicants, and total female applicants for each position; summary data of external job offers and hires, promotions, resignations, terminations, and layoffs by job group, sex, and minority group; and records pertaining to FCI’s compensation system.</td>
</tr>
<tr>
<td>Inventory Tracking System (ITS)</td>
<td>The Inventory Tracking System (ITS) tracks medical marijuana from its inception “seed” to the time it is sold, also known as “seed-to-sale” tracking. All medical marijuana inventory is tracked using the ITS and is also physically counted, daily.</td>
</tr>
</tbody>
</table>
Department heads throughout the facility are responsible for auditing physical inventory to make sure physical counts match the ITS. All transactions including beginning daily inventory, acquisitions of medical marijuana, sales, disposal and daily ending inventory are tracked. Records will be printed nightly and stored while the electronic copies will be uploaded to Applicant’s cloud-based server. The ITS is a real-time, web-based system that is always accessible to the Department via unique login information provided by Applicant. ITS records will be stored within the ITS and will be backed up to the secure cloud-based record storage site in accordance with Chapter 3796:2-2-04. Any record describing theft, loss or medical marijuana that is unaccounted for will be kept in both physical and electronic form in accordance with Chapter 3796:5-4-01.

Part VI(B): Compliance with Inventory Tracking System

Applicant will implement its record keeping procedures in compliance with the inventory tracking system as outlined by Chapters 3796:2-1-02(B)(4)(c), 3796:2-1-03(B)(3)(c), and 3796:2-2-04 of the Administrative Code. To this end, Applicant will track and submit into the inventory tracking system any information the department determines necessary for maintaining and tracking medical marijuana. When a plant reaches twelve inches in height or is transplanted from a cloning medium or apparatus into a growth medium or apparatus intended for the vegetative or flowering stages of growth cycle, whichever occurs sooner, Applicant will securely attach a tag to the plant or the plant’s container that includes: the cultivator’s name and license number; registered name of the strain; unique plant identifier; and general information regarding the plant that is used for traceability.

Prior to commencing business each day, Applicant will conduct an initial comprehensive inventory of all medical marijuana at the facility. If Applicant commences business with no medical marijuana on hand, this fact will be recorded as the initial inventory. Applicant will also establish ongoing inventory controls and procedures for the conduct of inventory reviews and comprehensive inventories of medical marijuana for traceability in the department’s inventory tracking system, which will additionally enable the cultivator to detect any diversion, theft, or loss in a timely manner. As business continues, Applicant will prepare a weekly inventory of medical marijuana at the facility, which shall include, at a minimum, the following: date of the inventory; amount of medical marijuana on hand, which will include the following: total count of plants, whether in the flowering, vegetative, or clone phase of growth and organized by room in which the plants are being grown; batch number, weight, and strain name associated with each batch at the cultivator’s facility that has been quarantined for testing or ready for sale to a processor or dispensary; and the total number of plants and every unique plant identifier that have been harvested, but are not yet associated with a batch. This inventory will be compared to the amount of medical marijuana sold since previous weekly inventory, which shall include the following: date of sale; license number and name of the processor or dispensary to which the medical marijuana was sold; and batch number, registered product name and quantity of medical marijuana sold; the date, quantity, and method of disposal of medical marijuana, if applicable; summary of the inventory findings; and the name, signature, and title of the employees who conducted the inventory and oversaw the inventory.

Additionally, a type 1 key employee shall conduct a physical, manual inventory of the medical marijuana on hand at the cultivator and compare the findings to an annual inventory report generated using the inventory tracking system on an annual basis. Applicant understands that these measures are a condition for renewal of a cultivator license. If any discrepancies are discovered outside of loss standard to the industry due to moisture loss and handling, the type 1 key employee shall report such findings to the department in accordance with Chapter 3796:5-4-01. All inventories, procedures and other
documents required by the Rules shall be maintained on the premises for a period of five (5) years and made available to the department at all times.

Applicant will store medical marijuana inventory on the premises in a designated, enclosed, locked facility identified in the plans and specifications submitted to the department and accessible only by authorized individuals. Applicant additionally understands that nothing will prohibit members of the department, a department’s designee, law enforcement, or other federal, state, or local government officials from entering any area of the facility if it is necessary to perform their governmental duties.