Cultivator Application – Filing Packet Notarized Cover Sheet

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

<table>
<thead>
<tr>
<th>Acknowledgement and Notarized Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ 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.</td>
</tr>
<tr>
<td>☑ 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.</td>
</tr>
<tr>
<td>☑ 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.</td>
</tr>
</tbody>
</table>

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).
## Business Represented:

**Parma Wellness Center, LLC**

<table>
<thead>
<tr>
<th>First Name</th>
<th>M.I.</th>
<th>Last Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Richard</td>
<td>A</td>
<td>Parizek</td>
</tr>
</tbody>
</table>

**Signature**

---

## Application Assistance Information

**Name of Company Providing Application Assistance (If individuals, please provide information below)**

<table>
<thead>
<tr>
<th>First Name</th>
<th>M.I.</th>
<th>Last Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sara</td>
<td></td>
<td>Gullickson</td>
</tr>
</tbody>
</table>

**Address**

4385 North 75th Street, Scottsdale, AZ 85251

**Type of Compensation for Services (e.g., future interest, equity stake, reoccurring payment, etc.)**

**Fee for Services**

**Signature of Responsible Party**

---

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

---

**YOLANDA J. MARTINEZ**
Notary Public - Arizona
Maricopa County
My Comm. Expires Dec 4, 2018

---
ALL PURPOSE ACKNOWLEDGMENT

State of Arizona

County of Maricopa

On this the 29th day of June, 2016, before me, Jennifer Moeckel, the undersigned Notary Public, personally appeared:

Abagale Bullickson, Melissa Walker, & Nicholas Roe.

Name(s) of Signor(s)

proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument, the person(s) or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

JENNIFER MOECKEL
Notary Public - Arizona Maricopa County Expires 07/09/2020

Signature of Notary Public

Jennifer Moeckel
Other Required Information (Printed name of Notary, Residence, etc)

Place Notary Seal and/or Any Stamp Above

OPTIONAL

Although the information in this section is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

Title or Type of Document: P0A, MM0A

© 2005 National Notary Association * 9350 De Soto Ave., P.O. Box 2402 * Chatsworth, CA 91311-2402 * www.nationalnotary.org
Item No. 5938
Reorder: Call Toll-Free 1-800 US NOTARY (1-800-876-6827)
Limited Power of Attorney

BE IT ACKNOWLEDGED that I, Sara Gullickson with a mailing address of 4385 n 75th street, Scottsdale, Arizona, 85251, the “Principal”, do hereby grant a limited and specific power of attorney to Abbie Gullickson of 5343 E Calle Redonda, Phoenix, Arizona, 85018 as my “Attorney-in-Fact”.

Said Attorney-in-Fact shall have full power and authority to undertake and perform only the following acts on my behalf:

Signing any and all documents on my behalf.

The authority herein shall include such incidental acts as are reasonably required to carry out and perform the specific authorities granted herein. My Attorney-in-Fact agrees to accept this appointment subject to its terms, and agrees to act and perform in said fiduciary capacity consistent with my best interest, as my Attorney-in-Fact in its discretion deems advisable.

The Attorney-in-Fact shall be able to have the authority herein beginning June 29th 2017 and end when this Principal dies in accordance with the State’s durable power of attorney laws. In addition, this power of attorney shall immediately be voided upon a revocation form being authorized by the Principal.

This power of attorney is governed by the laws in the State of Arizona and shall be signed in the presence of two (2) witnesses.

Principal’s Signature
Sara Gullickson

ACCEPTANCE OF APPOINTMENT

I, Abbie Gullickson, the attorney-in-fact, hereby accept appointment as attorney-in-fact in accordance with the foregoing instrument.

Attorney-in-Fact’s Signature
Abbie Gullickson
Affirmation by Witness 1

I, __________, witnessed the execution of this Power of Attorney by Sara Gullickson, and I affirm that he/she appeared to me to be of sound mind, was not under duress, and affirmed to me that he/she was aware of the nature of this Power of Attorney and signed it freely and voluntarily.

Witness 1 Signature __________
Print Name Melissa Walker Date 6/29/17

Affirmation by Witness 2

I, __________, witnessed the execution of this Power of Attorney by Sara Gullickson, and I affirm that he/she appeared to me to be of sound mind, was not under duress, and affirmed to me that he/she was aware of the nature of this Power of Attorney and signed it freely and voluntarily.

Witness 2 Signature __________
Print Name Nicklas Reo Date 6/29/17
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><strong>Business Entity Information</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Legal Name of Applicant (3796:2-1-02(B)(2)(a)):</td>
</tr>
<tr>
<td><strong>Parma Wellness Center, LLC</strong></td>
</tr>
<tr>
<td>2. Trade Name of Applicant:</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>4. Ohio Secretary of State Business Identification Number (3796:2-1-02(B)(2)(c)):</td>
</tr>
<tr>
<td><strong>4021778</strong></td>
</tr>
<tr>
<td>5. Business Address:</td>
</tr>
<tr>
<td><strong>3800 Embassy Pkwy, Ste 300</strong></td>
</tr>
<tr>
<td>6. City:</td>
</tr>
<tr>
<td><strong>Akron</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>44130</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>Parcel 17-A Corporate Drive Parcel #441-15-005</strong></td>
</tr>
<tr>
<td>10. City (if different than above):</td>
</tr>
<tr>
<td><strong>Parma</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>44130</strong></td>
</tr>
<tr>
<td>13. Business Phone Number:</td>
</tr>
<tr>
<td><strong>330-643-0268</strong></td>
</tr>
<tr>
<td>14. Email Address:</td>
</tr>
<tr>
<td><strong><a href="mailto:armar@cox.net">armar@cox.net</a></strong></td>
</tr>
<tr>
<td><strong>Primary Contact or Registered Agent Information</strong></td>
</tr>
<tr>
<td>15. First Name:</td>
</tr>
<tr>
<td><strong>Melinda</strong></td>
</tr>
<tr>
<td>16. M.I.</td>
</tr>
<tr>
<td>17. Last Name:</td>
</tr>
<tr>
<td><strong>Pierce</strong></td>
</tr>
<tr>
<td>18. Title (i.e., Owner, President, etc.):</td>
</tr>
<tr>
<td>19. Mailing Address (if different than Business Address):</td>
</tr>
<tr>
<td><strong>4400 Easton Commons Way, Ste 125</strong></td>
</tr>
<tr>
<td>20. City:</td>
</tr>
<tr>
<td><strong>Columbus</strong></td>
</tr>
<tr>
<td>-----------</td>
</tr>
<tr>
<td>Ohio</td>
</tr>
</tbody>
</table>

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

```
melinda@nationaldoc.com
```

(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>Richard</td>
<td></td>
<td>Parizek</td>
</tr>
</tbody>
</table>

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

**Chief Compliance Officer**

<table>
<thead>
<tr>
<th>29. Mailing Address (if different than Business Address):</th>
<th>30. City:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

31. State: 32. Zip Code: 33. Phone Number: 34. Email Address (if different than Business Email):

```
armar@cox.net
```

Identifying Tax Information

<table>
<thead>
<tr>
<th>35. FEIN/SSN</th>
<th>36. CAT Account #:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NA</td>
</tr>
</tbody>
</table>

37. Vendor’s License #: 38. Employer Withholding Account #: 39. Other Accounts at the Department of Taxation: NA
1B Liquid Assets Form
3796:2-1-03(A)(1), 3796:2-1-03(B)(5)(c)

To be Completed by Applicant
Name of Individual or Entity Applying for a Medical Marijuana Cultivator Certificate of Operations:

**Parma Wellness Center, LLC**

To be Completed by Applicant or CPA

- Level I: I hereby certify the above listed Applicant has at least $500,000 in liquid assets, which are unencumbered and can be converted within 30 days after a request to liquidate such assets.

-OR-

- Level II: I hereby certify the above listed Applicant has at least $50,000 in liquid assets, which are unencumbered and can be converted within 30 days after a request to liquidate such assets.

Date of Certification (must be within 30 days of Application submission) (3796:2-1-03(B)(5)(c)(ii):

6/28/2017

Printed Name of CPA or Applicant

**Bryan Franklin, CPA**

Printed Name of CPA or Applicant

**Villanueva & Company, P.C.**

Phone Number:

602-235-9414

Signature:

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

(SEAL)

ROXANNE M. COLANGELO
NOTARY PUBLIC
1C Financial Responsibility Form - Insurance
3796:2-1-03(B)(5)(d), 3796:2-1-05(B)(1)

To be Completed by Applicant

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

Richard A. Parizek, Chief Compliance Officer, Parma Wellness Center, 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:
June 27, 2017

Signature:

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

(SEAL)

LIMIN ZHANG
Notary Public - State of Arizona
MARIPOPA COUNTY
My Commission Expires June 25, 2021

NOTARY PUBLIC
To be Completed by Applicant or CPA

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

Parma Wellness Center, LLC

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.

-OR-

- Level II: I hereby certify the ability of the above listed Applicant to establish and maintain an escrow account or surety bond in the amount of $75,000, consistent with the Level II application requirements, prior to being awarded a Cultivator Certificate of Operations.

Surety Insurance Company Name (if applicable) (3796:2-1-05(C)):

Printed Name: Bryan Franklin, CPA

CPA Company Name (if applicable): Villanueva & Company, P.C.

Phone Number: 602-235-9414

Signature: [Signature]

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

(SEAL)

Roxanne M. Colangelo
Notary Public - Arizona
Maricopa County
My Commission Exp. 7/14/2020

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

To be Completed by the Applicant

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

Parma Wellness Center, LLC

Physical Address and Name of Proposed Medical Marijuana Cultivator Facility:

Parcel 17-A, Corporate Drive (Tax Parcel No. 441-15-005) - Parma Wellness Center, LLC

City: Parma

State: Ohio

Zip Code: 44130

County: Cuyahoga

Phone Number: 330-643-0268

Legal Description of the Property:

A vacant buildable, lot containing 3.4 acres of land, situated on Corporate Drive in the City of Parma, County of Cuyahoga, and State of Ohio and known as Lot Split Parcel 17-A in the Lot Split and Consolidation of Parcels 7 and 17 prepared by Christopher J. Dempsey and signed November 14, 2007 and recorded in Volume 355 Page 48 of Cuyahoga County Map Records.

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:

Geis Family, Ltd.

Length of Lease/Expiration:

The property will be sold to the applicant if the applicant is awarded a provisional license.

☐ 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.

PROPERTY OWNER SIGNATURE

DATE SIGNED 6/13/17

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

(SEAL)

MMCP-C-1001A (v1.1) Medical Marijuana Cultivator Application - Filling/Identifiers
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.
IG Notice of Proper Zoning Form
3796.2-1-02(B)(2)(k)

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

| Physical Address and Name of Proposed Medical Marijuana Cultivator Facility: |
| Parcel 17-A, Corporate Drive (Tax Parcel No. 441-15-005) - Parma Wellness Center, LLC |

<table>
<thead>
<tr>
<th>City: Parma</th>
<th>County: Cuyahoga</th>
</tr>
</thead>
<tbody>
<tr>
<td>State: Ohio</td>
<td>Zip Code: 44130</td>
</tr>
<tr>
<td>Phone Number:</td>
<td>330-643-0268</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>To be Completed by Zoning Authority or Local Government</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction of Zoning Office or Local Government</td>
</tr>
</tbody>
</table>

**City of Parma**

☑ 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 Cultivator facility at the address listed above at this time.

☑ The area of the City of Parma, OH 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.

<table>
<thead>
<tr>
<th>Printed Name of Authorized Zoning Representative: Paul W. Deichmann</th>
<th>Title: City Engineer &amp; Building Commissioner</th>
</tr>
</thead>
</table>

Signature: [Signature]

Subscribed and sworn to before me this 22<sup>nd</sup> day of June, 2017.

[Notary Public Seal]

LYNNE S. THOMAY
NOTARY PUBLIC
STATE OF OHIO
Composer Expires 4/8/22
Recorded in Cuyahoga County
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. -- In process

Mark one of the boxes above.

Include this form in application even if no permit is attached.
II Owners and Officers Roster Form
3796:2-1-02(B)(2)(e)

To be Completed by Applicant

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

Parma Wellness Center, LLC

I certify, to the best of my knowledge, that the following requirements comply as to the date of the application:

☐ No owner or officer is a physician who has been certified or applied for certification to recommend medical marijuana under Chapter 4731.30 of the Revised Code.

☐ No owner or officer has ownership, financial interest, or a compensation arrangement with a laboratory licensed under Chapter 3796. of the Administrative Code or is an applicant for a license to conduct laboratory testing.

I certify, that I acknowledge the following condition of the review of my application:

☐ No owner or officer may have a financial interest in more than one provisional license or cultivator certificate of operation at any time (3796:2-1-04(D)). If any owner or officer is included on more than one person’s application or entity’s application, the Department of Commerce will remove both applications from consideration.

Provide the following list for every individual who has an ownership interest or financial interest, either directly or indirectly through an entity, as defined in O.A.C. 3796:1-1-01, in the Applicant’s business or will directly or indirectly participate in the management of the operation. If the financial interest is in an entity, provide the individuals with an equity or profit interest in the entity. Attachment 1K is to be completed for each individual listed. Entries in the Identifier Legend column (Person A, Person B, etc.) must be used in place of an individual’s name if that individual is referenced in Section 2 of the application.

<table>
<thead>
<tr>
<th>Identifier Legend</th>
<th>Name (First, Middle, Last)</th>
<th>Role</th>
<th>% Interest</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ex: Person A</td>
<td>John Q. Public</td>
<td>Owner</td>
<td>5%</td>
</tr>
<tr>
<td>Person A</td>
<td>Dr. Sheldon Rose</td>
<td>Owner</td>
<td>51%</td>
</tr>
<tr>
<td>Person B</td>
<td>Scott Barker</td>
<td>Owner</td>
<td>20%</td>
</tr>
<tr>
<td>Person C</td>
<td>John Fife Symington IV</td>
<td>Owner</td>
<td>20%</td>
</tr>
<tr>
<td>Person D</td>
<td>Richard Parizek</td>
<td>Owner</td>
<td>9%</td>
</tr>
</tbody>
</table>
1J Organizational Chart Cover Page
3796:2-1-02(B)(2)(e), 3796:2-1-03(B)(1)(b)

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

Names on the organizational chart should match those listed on Attachment II.

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.
PLEASE NOTE:
- The consultants listed on the org chart are acting on behalf of their own or their employer’s entities, not as individuals/officers and are voluntarily providing their expertise and knowledge for application purposes and have not received any compensation. Each consultant has been given an indicator and is outlined in Section 1P, Entity Identifier Legend Form.
1K Individual Background Information Form
(3796:2-1-02(B)(2), 3796:2-1-03(A))

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

Name of Individual
John Fife Symington, IV

Date of Birth

Title (if applicable)
Chief Operating Officer

Role (Owner, Officer, etc.)
Owner

Mailbox Address

City:
State:
Zip Code:

Phone Number:
Email Address:

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

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

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

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

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

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

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

Signature: 

Date: 6-28-17

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

YOLANDA J. MARTINEZ
Notary Public - Arizona
Maricopa County
My Comm. Expires Dec 4, 2018

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

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

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

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

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

Signature: [Signature]

Date
June 27, 2017

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

(SEAL)

BRENDA M. GILLIAM
Notary Public - Arizona
Maricopa County
Expires 09/19/2018

NOTARY PUBLIC
1K Individual Background Information Form
(3796:2-1-02(B)(2), 3796:2-1-03(A))

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

<table>
<thead>
<tr>
<th>Name of Individual</th>
<th>Date of birth</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sheldon Rose</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Title (if applicable)</th>
<th>Role (Owner, Officer, etc.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>MD</td>
<td>Owner</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mailing Address</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>City:</th>
<th>State:</th>
<th>Zip Code:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- I understand that the Department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program, I hereby authorize the release of any and all information of a confidential or privileged nature to the Department and its agents (3796:2-1-02(B)(2)(f)).
- I certify that I have not been convicted of any disqualifying offense as described in Chapter 3796 of the Ohio Administrative Code (3796:2-1-03(A)(2)(b)).
- I certify that I am not a physician who has been certified or applied for certification to recommend medical marijuana under Chapter 4731.30 of the Revised Code (3796:2-1-03(A)(2)(b)).
- I certify that I have no ownership investment interest, or a compensation arrangement with a laboratory licensed under Chapter 3796 of the Administrative Code or an applicant for a license to conduct laboratory testing (3796:2-1-03(A)(5)).
- I certify that I acknowledge that no owner or officer may have a financial interest in more than one provisional license or cultivator certificate of operation at any time (3796:2-1-04(D)). If any owner or officer is included on more than one applicant’s application, the Department will deny both applications.
- I certify that I am in compliance with all provisions of Chapter 3796 of the Administrative Code regarding prohibited license holders and that the information I have provided is true and correct.
- I hereby authorize the Ohio Department of Taxation and any of its agents and/or employees to release information to the Ohio Department of Commerce. These records and information shall be limited to the information obtained and maintained by the Ohio Department of Taxation and shall not contain any federal tax information as defined in I.R.C. 6103 and received from the Internal Revenue Service. I expressly waive the confidentiality provisions of the Ohio Revised Code, which would otherwise prohibit disclosure, and agree to hold the above-
referenced organizations harmless with respect to the disclosure herein. I certify under the penalties of perjury that I am the taxpayer identified below.

<table>
<thead>
<tr>
<th>Signature:</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>6/23/17</td>
</tr>
</tbody>
</table>

Subscribed and sworn to before me this 93 day of JUNE, 2017.

MONICA K. FLOYD
Notary Public, State of Ohio
My Commission Expires
January 4, 2021

(SEAL)

NOTARY PUBLIC

MMCP-C-1001A (v1.1), Ohio Cultivator Application – Filing/Identifiers (Form 1K)
## 1K Individual Background Information Form
(3796:2-1-02(B)(2), 3796:2-1-03(A))

<table>
<thead>
<tr>
<th>Name of Individual</th>
<th>Date of birth:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Richard A. Parizek</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Title (if applicable)</th>
<th>Role (Owner, Officer, etc.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Compliance Officer</td>
<td>Owner &amp; Officer</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mailing Address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>City:</th>
<th>State:</th>
<th>Zip Code:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Phone Number:</th>
<th>Email Address:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

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

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

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

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

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

<table>
<thead>
<tr>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>June 27, 2017</td>
</tr>
</tbody>
</table>

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

(SEAL)

LIMIN ZHANG
Notary Public - State of Arizona
MARICOPA COUNTY
My Commission Expires June 25, 2021

NOTARY PUBLIC
II. Business in Other Jurisdictions Form
3796:2-1-02(B)(2)(g)

To be Completed by Applicant

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

Parma Wellness Center, LLC

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

<table>
<thead>
<tr>
<th>State</th>
<th>Type</th>
<th>Dates of Issue/Expiration</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>AZ</td>
<td>Dispensary Registration Certificate</td>
<td>8-8-12 / 8-7-17; yearly renewal</td>
<td>00000019DCGM00234427</td>
</tr>
<tr>
<td>AZ</td>
<td>Approval to Operate Dispensary</td>
<td>8-8-12 / 8-7-17; yearly renewal</td>
<td>00000019DCGM00234427</td>
</tr>
<tr>
<td>AZ</td>
<td>Approval to Operate Cultivation Facility</td>
<td>12-2-16 / 8-7-17; yearly renewal</td>
<td>00000019DCGM00234427</td>
</tr>
</tbody>
</table>

☐ 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)(iii))

☐ 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).**
Signature: [Signature]  Date: 6.27.17

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

(SEAL)

LIMIN ZHANG
Notary Public - State of Arizona
MARICOPA COUNTY
My Commission Expires June 25, 2021

NOTARY PUBLIC
1M Copies of Licenses from Business in Other Jurisdictions Cover Page
3796:2-1-02(B)(2)(i)

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

☐ No license copies are attached.

Mark one of the boxes above.

Include this form in application even if no license copies are attached.
211 Chase Creek Rd, Clinton, Arizona 85533
Holistic Patient Wellness Group

Expiration Date: August 7, 2017
Effective Date: August 8, 2016

Registration Certificate Identification Number: 00000109DCM0024427

This Certificate is not Transferable

Pursuant to Title 9, Chapter 17, Article 3, Department of Health Services, Title 36, Arizona Revised Statutes and is not an approval to operate. This certificate has been issued under the authority of Title 36, Chapter 28, Arizona Revised Statutes and the Department of Health Services, Title 36, Chapter 28. This registration certificate is not an approval to operate and has been issued a Medical Marijuana Dispensary Registration Certificate.
Holistic Patient Wellness Group
211 Chase Creek Rd, Clifton, Arizona, 85533

APPROVAL TO OPERATE

THIS CERTIFICATE IS NOT TRANSFERABLE

Registration Certificate Identification Number: 00000019DCGM00234427
Effective Date: August 8, 2016
Expiration Date: August 7, 2017

This dispensary has been approved to cultivate medical marijuana at an offsite location in Arizona (see copy of cultivation site's Approval to Operate on file).

A Certificate for Approval to Operate a dispensary and, if applicable, a dispensary's cultivation site, issued by the Arizona Department of Health Services pursuant to A.R.S. Title 36, Chapter 28.1 and A.C.C. Title 9, Chapter 17 does not protect the holder from legal action by local, city, state, or federal authorities, including possible criminal prosecution for violations of federal law for the sale, manufacture, distribution, use, dispensing, possession, etc. of marijuana. The acquisition, possession, cultivation, manufacturing, delivery, transfer, transportation, supplying, selling, distributing, or dispensing medical marijuana under state law is lawful only if done in strict compliance with the requirements of the State Medical Marijuana Act (“Act”), A.R.S Title 36, Chapter 28.1 and A.C.C. Title 9, Chapter 17. Any failure to comply with the Act may result in revocation of the Registration Certificate issued by the Arizona Department of Health Services, and possible arrest, prosecution, imprisonment, and fines for violation of state drug laws. The State of Arizona, including but not limited to the employees of the Arizona Department of Health Services, is not facilitating or participating in any way with my acquisition, possession, cultivation, manufacturing, delivery, transfer, transportation, supplying, selling, distributing, or dispensing medical marijuana.

Recommended By: Thomas Salow
Branch Chief

Issued By: Colby Bower
Assistant Director

Amended: 12.2.2016
Cultivation Site
Holistic Patient Wellness Group
650 N Industrial Way, Snowflake, Arizona 85937

APPROVAL TO OPERATE

THIS CERTIFICATE IS NOT TRANSFERABLE

Registration Certificate Identification Number: 00000019DCGM00234427
Effective Date: December 2, 2016
Expiration Date: August 7, 2017

This cultivation site has been approved to cultivate medical marijuana at this location for the above named dispensary located at 211 Chase Creek Rd, Clifton, Arizona 85533.

A Certificate for Approval to Operate a dispensary and, if applicable, a dispensary's cultivation site, issued by the Arizona Department of Health Services pursuant to A.R.S. Title 36, Chapter 28.1 and A.C.C. Title 9, Chapter 17, does not protect the holder from legal action by local, city, state, or federal authorities, including possible criminal prosecution for violations of federal law for the sale, manufacture, distribution, use, dispensing, possession, etc. of marijuana. The acquisition, possession, cultivation, manufacturing, delivery, transfer, transportation, supplying, selling, distributing, or dispensing medical marijuana under state law is lawful only if done in strict compliance with the requirements of the State Medical Marijuana Act ("Act"), A.R.S Title 36, Chapter 28.1 and A.C.C. Title 9, Chapter 17. Any failure to comply with the Act may result in revocation of the Registration Certificate issued by the Arizona Department of Health Services, and possible arrest, prosecution, imprisonment, and fines for violation of state drug laws. The State of Arizona, including but not limited to the employees of the Arizona Department of Health Services, is not facilitating or participating in any way with my acquisition, possession, cultivation, manufacturing, delivery, transfer, transportation, supplying, selling, distributing, or dispensing medical marijuana.

Recommended By: Carla Berg
Bureau Chief Special Licensing

Issued By: Colby Bower
Assistant Director

Approval Date 11.16.2012

BSL-001 Rev. 06/16

THE BACK OF THIS DOCUMENT LISTS VARIOUS SECURITY FEATURES
THAT WILL PROTECT AGAINST COPY COUNTERFEIT AND ALTERATION.
IN Tax Payment Records Cover Page
3796:2-1-02(B)(6)(e), 3796:2-1-03(A)(6), 3796:2-1-03(B)(5)(e)

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

Include this cover page.
Cultivator Application – Financial Interest Tax Processing Form

Applicant Name: Parma Wellness Center

Applicant Number (if applicable):

Taxpayer Name: Sheldon Rose

Taxpayer Address: [Redacted]

Taxpayer FEIN/SSN: [Redacted]

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

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

<table>
<thead>
<tr>
<th>Legal Business Name</th>
<th>FEIN</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>NA</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

[SEE OTHER SIDE TO COMPLETE FORM]
If Taxpayer has a controlling financial interest or had a controlling financial interest within the last three years in a business in an industry unrelated to marijuana, please list the applicable information below.

<table>
<thead>
<tr>
<th>Legal Business Name</th>
<th>FEIN</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>SHR MD LLC</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

Name and Title of Taxpayer:  Dr. Sheldon Rose, MD

Signature: ___________________________  Date:  6/27/2017

Taxpayer Telephone Number:  [Redacted]

Please send the completed form to:

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

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

Parma Wellness Center, 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: 6/23/17

* The members of the economically disadvantaged groups must be identified in Form 11 along with their percentage of ownership.
**1P Entity Identifier Legend Form**

In addition to Form 11 Owners and Officers Roster Form for individuals, entries in the Entity Identifier Legend must be used in place of an entity’s name for any entity that is referenced in Section 2 of the application.

<table>
<thead>
<tr>
<th>Identifier Legend</th>
<th>Entity Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example: Entity A</td>
<td>ACME Construction</td>
</tr>
<tr>
<td>Example: Entity B</td>
<td>Capital Investors, LLC</td>
</tr>
<tr>
<td>Entity A</td>
<td>Parma Wellness Center, LLC</td>
</tr>
<tr>
<td>Entity B</td>
<td>Copperstate Farms</td>
</tr>
<tr>
<td>Entity C</td>
<td>Global Pacific Holdings, LLC</td>
</tr>
<tr>
<td>Entity D</td>
<td>Greystone Title Agency Holdings, LLC</td>
</tr>
<tr>
<td>Entity E</td>
<td>Bluegum Group Pty. Ltd</td>
</tr>
<tr>
<td>Entity F</td>
<td>Goldman, Sachs &amp; Co</td>
</tr>
<tr>
<td>Entity G</td>
<td>International Greenhouse Produce</td>
</tr>
<tr>
<td>Entity H</td>
<td>Apache Produce</td>
</tr>
<tr>
<td>Entity I</td>
<td>NJOY, Inc.</td>
</tr>
<tr>
<td>Entity J</td>
<td>CyraCom International, Inc.</td>
</tr>
<tr>
<td>Entity K</td>
<td>The Capital Coach</td>
</tr>
<tr>
<td>Entity L</td>
<td>AM&amp;G Asset Management, Inc.</td>
</tr>
<tr>
<td>Entity M</td>
<td>Island Medical Management</td>
</tr>
<tr>
<td>Entity N</td>
<td>Security Risk Management Consultants</td>
</tr>
<tr>
<td>Entity O</td>
<td>BioTrack THC</td>
</tr>
<tr>
<td>Entity P</td>
<td>Villanueva &amp; Company</td>
</tr>
<tr>
<td>Consultant A</td>
<td>Susan Sweeney</td>
</tr>
<tr>
<td>Consultant B</td>
<td>Jane Fix</td>
</tr>
</tbody>
</table>
1P Entity Identifier Legend

In addition to Form 11 Owners and Officers Roster Form for individuals, entries in the Entity Identifier Legend must be used in place of an entity’s name for any entity that is referenced in Section 2 of the application.

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<tr>
<th>Identifier Legend</th>
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<tbody>
<tr>
<td>Example: Entity A</td>
<td>ACME Construction</td>
</tr>
<tr>
<td>Example: Entity B</td>
<td>Capital Investors, LLC</td>
</tr>
<tr>
<td>Consultant C</td>
<td>William Bethea</td>
</tr>
<tr>
<td>Consultant D</td>
<td>Michael Messieha</td>
</tr>
<tr>
<td>Consultant E</td>
<td>Ryan Hurley</td>
</tr>
<tr>
<td>Consultant F</td>
<td>Todd Peterson</td>
</tr>
<tr>
<td>Firm A</td>
<td>Rose Law Group</td>
</tr>
<tr>
<td>University A</td>
<td>St Matthew’s University School of Medicine</td>
</tr>
<tr>
<td>Hospital A</td>
<td>Mount Sinai Hospital</td>
</tr>
<tr>
<td>Hospital B</td>
<td>University Hospital Case Medical Center</td>
</tr>
<tr>
<td>Variety A</td>
<td>Kimbo Kush</td>
</tr>
<tr>
<td>Variety B</td>
<td>Kushberry</td>
</tr>
<tr>
<td>Variety C</td>
<td>Lemon Kush</td>
</tr>
<tr>
<td>Variety D</td>
<td>CBD Therapy</td>
</tr>
<tr>
<td>Variety E</td>
<td>Lavender</td>
</tr>
<tr>
<td>Variety F</td>
<td>Chocalope</td>
</tr>
<tr>
<td>Variety G</td>
<td>Jedi Kush</td>
</tr>
<tr>
<td>Variety H</td>
<td>CBD Yummy</td>
</tr>
<tr>
<td>Variety I</td>
<td>Blueberry Irene</td>
</tr>
<tr>
<td>Variety J</td>
<td>Granddaddy Purple</td>
</tr>
</tbody>
</table>
**1P Entity Identifier Legend**

In addition to Form 11 Owners and Officers Roster Form for individuals, entries in the Entity Identifier Legend must be used in place of an entity’s name for any entity that is referenced in Section 2 of the application.

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</tr>
<tr>
<td>Example: Entity B</td>
<td><em>Capital Investors, LLC</em></td>
</tr>
<tr>
<td>Variety K</td>
<td><em>Sweet Cheese</em></td>
</tr>
<tr>
<td>Variety L</td>
<td><em>CBD Cannatonic</em></td>
</tr>
<tr>
<td>Variety M</td>
<td><em>Blue Dream</em></td>
</tr>
<tr>
<td>Variety N</td>
<td><em>Tangerine Dream</em></td>
</tr>
<tr>
<td>Variety O</td>
<td><em>Ninja Fruit</em></td>
</tr>
<tr>
<td>Variety P</td>
<td><em>CBD Shark Shock</em></td>
</tr>
<tr>
<td>Variety Q</td>
<td><em>Tangie</em></td>
</tr>
<tr>
<td>Variety R</td>
<td><em>Alien Poison OG</em></td>
</tr>
<tr>
<td>Variety S</td>
<td><em>Grape OG</em></td>
</tr>
<tr>
<td>Variety T</td>
<td><em>White Walker Kush</em></td>
</tr>
<tr>
<td>Variety U</td>
<td><em>Laughing Buddha</em></td>
</tr>
<tr>
<td>Variety V</td>
<td><em>Tahoe OG</em></td>
</tr>
<tr>
<td>Variety W</td>
<td><em>Shaman</em></td>
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<tr>
<td>Variety X</td>
<td><em>Deadhead OG</em></td>
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<tr>
<td>Variety Y</td>
<td><em>Louis XIII OG</em></td>
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<tr>
<td>Variety Z</td>
<td><em>CBD Critical Mass</em></td>
</tr>
<tr>
<td>Strain A</td>
<td><em>Master Kush</em></td>
</tr>
<tr>
<td>Strain B</td>
<td><em>Cornbread</em></td>
</tr>
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</table>
1P Entity Identifier Legend

In addition to Form 11 Owners and Officers Roster Form for individuals, entries in the Entity Identifier Legend must be used in place of an entity’s name for any entity that is referenced in Section 2 of the application.

<table>
<thead>
<tr>
<th>Identifier Legend</th>
<th>Entity Name</th>
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<tbody>
<tr>
<td>Example: Entity A</td>
<td>ACME Construction</td>
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<tr>
<td>Example: Entity B</td>
<td>Capital Investors, LLC</td>
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<tr>
<td>Strain C</td>
<td>Jack Herer</td>
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<tr>
<td>Strain D</td>
<td>Mazar</td>
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<td>Strain E</td>
<td>Super Silver Haze</td>
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<td>Strain F</td>
<td>Obi Wan OG Kush</td>
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<td>Strain G</td>
<td>CBD Bubba Kush</td>
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<td>Strain H</td>
<td>Lemon Skunk</td>
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<tr>
<td>Strain I</td>
<td>Purple Haze</td>
</tr>
<tr>
<td>Strain J</td>
<td>Violeta</td>
</tr>
<tr>
<td>Strain K</td>
<td>CBD Cannatonic</td>
</tr>
<tr>
<td>Organization A</td>
<td>The Alcohol, Drug Addiction and Mental Health Services</td>
</tr>
<tr>
<td>Organization B</td>
<td>Opiate Collaborative</td>
</tr>
<tr>
<td>Organization C</td>
<td>The Consortium of African American Organization</td>
</tr>
<tr>
<td>Organization D</td>
<td>Local Chapter of State Veterans’ Program</td>
</tr>
<tr>
<td>Organization E</td>
<td>Ohio Women Inc</td>
</tr>
</tbody>
</table>
The undersigned is an Applicant for a medical marijuana cultivator license. The Applicant understands that the Department of Commerce is an entity of the State of Ohio and any documents or data submitted to the State of Ohio may be disclosed by the State pursuant to an Ohio Public Records Act request.

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

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

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

Signature of Person or Authorized Representative

Date

6.27.17

Printed Name of Applicant

Richard A. Parizek, Chief Compliance Officer, Parma Wellness Center, LLC
The Supremacy Clause of the United States Constitution (Article VI, Clause 2) establishes that the Constitution, federal laws made pursuant to it, and treaties made under its authority, constitute the supreme law of the land. It provides that state courts are bound by the supreme law; in case of conflict between federal and state law, the federal law must be applied. In this respect, the following sections of the Parma Wellness Center’s disclosures or individual disclosures, including tax return information, are not subject to disclosure under the Ohio Public Records Act and/or the Freedom of Information Act.

The information contained in Sections 2B (Operations Plan), 2D (Security Plan) and 2E (Financial Plan) all qualify for one or more FOIA exemptions under 5 U.S.C. § 552(b)(1)-(9). These exemptions protect against disclosure of information which would (i) substantially harm, individual privacy, or (ii) reveal "[t]rade secrets and commercial or financial information obtained from a person that is privileged or confidential." 5 U.S.C. § 552(b)(4).

Parma Wellness Center’s Sections 2B Operations Plan (Page 21 – 50) incorporates a specifically designed methods of drying and curing medical cannabis. The cost of development and uniqueness of these methods qualifies as a commercially valuable plan, formula, process, or device. Therefore the Operations Plan is "a secret, commercially valuable plan, formula, process, or device that is used for the making, preparing, compounding, or processing of trade commodities and that can be said to be the end product of either innovation or substantial effort." See Public Citizen Health Research Group v. FDA, 704 F.2d 1280, 1288 (D.C. Cir. 1983).

Similarly, Parma Wellness Center Section 2D Security Plan (Page 85 – 114), if disclosed to unscrupulous competitors or to criminal members of the general public may lead to a loss of valuable inventory and, therefore, may cause "substantial harm to the competitive position of [Parma Wellness Center], the person from whom the information was obtained. See National Parks and Conservation Ass’n v. Morton, 498 F.2d 765, 770 (D.C.Cir. 1974); see also Frasee v. U.S. Forest Service, 97 F.3d 367, 371 (9th Cir. 1996)."

In addition, Parma Wellness Section 2E Financial Plan (Page 116 – 124, including sources of funding and other information) also qualifies for an exemption under 5 U.S.C. § 552(b)(4) as "detailed information on [Parma’s] marketing plans, profits, or costs qualifies as confidential business information.” See Public Citizen Health Research Group v. FDA, 704 F.2d 1280, 1288 (D.C. Cir. 1983).

Finally, all of the personal and tax information disclosed under Sections 1N and/or 1I would be exempt from a FOIA request under 5 U.S.C. § 552(b)(3) as 26 U.S.C. Sec. 6103 as such disclosure is barred by statute. See See Long v. IRS, 742 F.2d 1173, 1178 (9th Cir. 1984). Further, the information in Sections 1N and/or 1I would be exempt under 5 U.S.C. § 552(b)(6), as the disclosure of individual tax records “constitute a clearly unwarranted invasion of personal privacy.” This exemption protects the privacy interests of individuals by allowing an agency to withhold personal data kept in government files, in this case with the State of Ohio. Moreover, the Privacy Act of 1974 regulates the disclosure of personal information about an individual.
Cultivator Application – Filing Packet Section 2: Non-Identifiers

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

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

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

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

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
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<tr>
<td>2A</td>
<td>Business Plan</td>
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<td></td>
<td>Experience in Business</td>
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</tr>
<tr>
<td></td>
<td>Business Model</td>
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</tr>
<tr>
<td>2B</td>
<td>Operations Plan</td>
<td>Completed</td>
</tr>
<tr>
<td></td>
<td>Experience in Agriculture / Cultivation</td>
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<td></td>
<td>Cultivation Methods and Proposed Strains</td>
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<tr>
<td></td>
<td>Product Time and Production Schedule</td>
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<td>Marijuana Cultivation Area Layout and Environment</td>
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<tr>
<td></td>
<td>Standard Operating Procedures</td>
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<td>Staffing and Training</td>
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<td>2C</td>
<td>Quality Assurance Plan</td>
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<td>Packaging and Labeling</td>
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<td>Inventory Control</td>
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<td>Adverse Events and Recall Procedures</td>
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<td>Record Keeping and Regulatory Compliance</td>
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<tr>
<td></td>
<td>Security Plan</td>
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<tr>
<td></td>
<td>Surveillance Technology and Physical Security</td>
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<td></td>
<td>Transportation</td>
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<td></td>
<td>Facility Plot Plan and Specifications</td>
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<td></td>
<td>Emergency Notification Procedures</td>
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<tr>
<td>2E</td>
<td>Financial Plan</td>
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<td></td>
<td>Funding Analyses</td>
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</tr>
<tr>
<td></td>
<td>Operating Expense Breakdown</td>
<td>Completed</td>
</tr>
</tbody>
</table>
2A Business Plan
(Maximum of 15 pages, see instructions for formatting)

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

Applicant should provide a narrative detailing support for the following:

Part I: Experience in Business

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

Part II: Business Model

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

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

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

Entity A, founded and established by an Ohio native, is entering the medical marijuana industry in Ohio as a level I cultivator. With over 15 years of combined medical marijuana experience, the team is comprised of experienced individuals who currently hold Medical Marijuana ("MM") business licenses in international and national regulated markets in addition to local medical professionals and others with high level business management experience not only within the MM industry but across several fields including retail, agriculture, manufacturing, and construction that encompass the necessary ingredients for a viable and successful MM operation.

An affiliate of Entity A is a licensed producer of MM products in an international market and the first public licensed MM producer to report positive cash flow from operations and positive earnings in consecutive quarters. This MM producer’s mission is to provide pharma-grade MM and superior patient care while balancing patient economics and returns to shareholders. In staying true to their mission, this MM producer has established themselves as a go to source for patient and physician information with educational patient and physician programs to ensure they are covering all spectrums of the MM program. They have assisted and participated in the success of many MM businesses even expanding to the United States. They have been a public company since 2011, when the MM industry in the United States hardly existed then. The longevity of this MM producer’s existence in the MM industry allows them to have the knowledge and expertise most will not acquire in Ohio’s new program for years to come. Their sales were approximately $500,000 and grew to over $8 million in revenue during a one year time period and has six consecutive quarters of positive earnings. With a proven track record of success, access to capital, proven MM Methodology and team of professionals within other MM state programs, Entity A will leverage their MM expertise and resources should we be granted a cultivators license.

Affiliated with Entity A is a MM State licensed facility in the United States that is operated and managed by Entity B. With only a limited amount of MM license awarded, they achieved a perfect score with no deficiencies for their final license application review and has since become one of the largest growing facilities in the state serving over 100 operational state licensed dispensaries and over 100,000 qualifying patients. Entity B owns approximately 1.7 million square feet of greenhouses and currently has 217,800 square feet in production with another 130,200 square feet of MM production slated to come on-line in the fall of this year. At Entity B, Person C currently oversees a team of 91 employees who are responsible for the production of over 100 different varieties of MM strains. Person B and Person C co-managed the design, permitting, and retro-fit of the facility in six months. With approval from the state for the expanded cultivation facility, the first harvest is expected in summer of 2017 with a full harvest on the expanded operation expected in late 2017. Entity B estimates that its expanded operations are capable of annualized production of approximately 40,000 pounds. The current price for wholesale MM in the state’s market is approximately $2,000 per pound. Entity B has secured over 100 different MM varieties/strains, including many CBD strains for eventual offer to its...
customers. Several of the varieties are currently being tested to determine consumer demand and optimal growing metrics.

To ensure the importance of locality, Entity A has partnered up with a team of Ohio Medical Professional(s) to bring Quality Products, Research, Patient Protocols and support to Ohio’s new and nascent market. Entity A’s mission is to provide access to pharmaceutical grade MM and individualized services to improve patients’ lives and promote the well-being of the citizens of Ohio.

Each team member has been carefully selected and assigned specific roles and responsibilities outlined below, allowing for the cultivation facility to function efficiently in all areas including facility design, construction, staffing, employee training, IT systems, security and surveillance, transportation, storage, packaging and labeling, inventory control, disposal and waste removal, recall procedures, diversion prevention, cultivation method, nutrient management, sanitation and safety, quality control, recordkeeping and regulatory compliance. Upon hire, all employees will receive an Employee Manual detailing the Facility’s Standard Operating Procedures (SOPs). Prior to working in the Facility, employees will be required to pass mandatory testing on the specific protocols. Employees will be trained at Entity B’s cultivation facility while the Ohio facility is under construction. This will allow for a smooth transition in to operations should the State of Ohio grant Entity A a provisional license.

Executive Biographies

All consulting roles outlined below are acting on behalf of their own or their employer’s entities, not as individuals/officers and are voluntarily providing their expertise and knowledge for application purposes and have not received any compensation. Each consultant has been given an indicator and is outlined in Section 1P, Entity Identifier Legend Form. The consultants will assist with implementing the local hiring plan to uphold our staffing mission to focus on hiring local talent as it relates to each job function.

Person B: Chief Executive Officer (CEO)

Person B is the President of Entity C, a principal investment firm. Investments include Entity D, regulated by a State Financial Department. Person B was also previously Managing Director of Entity E, an international sector of a leading U.S computer manufacturer where he grew sales from $60 million to more than $300 million and managed operations in various international markets. Person B was CEO of a leading national provider of mobile television production services for several notable television networks. Person B also worked with Entity F and was involved in large and mid-market leveraged buyouts. Additionally, Person B is a Director of one of the largest 501(c) 3 non-profit organizations in a state within the U.S that include charitable activities such as classes for at risk kids. As the CEO, Person B will be responsible for all facets of the operation, including financial oversight. He is the leader of the executive management team with responsibility for managing all senior managers at the organization. The CEO is responsible for all departments of the cultivation facility. The position also requires significant interaction with the board of directors and all outside groups including state regulators, local government officials, and community groups.

Person C: Chief Operating Officer (COO)

Person C has been working in greenhouse agriculture for more than 20 years. Person C founded Entity G, a large scale greenhouse operation. The company produces over 150,000,000 pounds
of high-quality tomatoes, seedless cucumbers and colored bell peppers every year. Entity G employs more than 3,000 people and farms 800 covered acres of greenhouses and ships millions of pounds of vegetables to the Unites States each year. Person C founded Entity H which is an importer and distributor of fresh produce across national and international markets. Entity H sells all of Entity G’s products as well as vegetables produced by third-party growers and has 40 employees. Person C founded Entity B, operator and management company for a state MM licensed producer in another legal MM state which is now his primary business focus. Person C graduated with honors from a very notable and well respected University. Entity A will leverage Person C’s significant experience in chain of custody control and product tracking to ensure the implementation of appropriate and effective industry best practices and product tracking standards utilizing ISO 9000 standards and Good Manufacturing Practices (GMP). Person C will be responsible for overseeing the day-to-day operations of the Facility, ensuring the accuracy and efficiency of the Inventory Control Software, and the security of the Facility, its Staff, and all medical marijuana. The COO oversees all purchasing and delivery, and verifies both the accurate quantity of all medical marijuana within the Facility Inventory, in each area of samples, testing, quarantine, packaging, labeling, storage, distribution, and transportation.

Consultant A: Financial Consultant
Consultant A is an experienced and results driven leader with over 25 years of hands on experience with building teams and creating value across finance, accounting, FP&A, operations, IT and HR. Consultant A has built financial planning and analysis teams, budgeted and forecasted departmental goals for budgetary controls, and implemented policies, process and procedures for finance and operations. Consultant A was named CFO of the year at a local chapter of an International Financial Organization. Currently Consultant A is the CFO at Entity B and affiliated companies where she implemented accounting systems and controls in a start-up environment including budgets, ERP software selection, and standard cost model for agricultural company. Consultant A established process and procedures for month end close, opened year financial statements, tax fillings and audits, along with insurance portfolio and banking relationships. Consultant A assisted with recognizing potential cost and project timeline overruns while overseeing accounting and HR. Consultant A was the Vice President of Finance and eventually became CFO at Entity I, where she provided recommendations for streamlining staffing and processes as well as implement internal controls and increased visibility across the organization through accurate financial reporting and transparency. She implemented SaaS ERP and various other software packages to increase functionality and efficiency in near-turnaround environment. She also supported reporting to Private Equity Owners and Board. Consultant A was also the CFO and COO at Entity J, where she created profitability in first six months following two years of losses through targeted cost cutting, increased efficiencies and improved processes in a call center operation company serving highly regulated industries. She created a department for improved decision making processes based on analytics and Key Performance Indicators resulting in increased efficiencies and 12% increase in profitability from operations. Developed sales strategy and pricing models for increased growth and profitability resulting in CAGR of more than 25% over 7 years. She led the IT department including Risk Analysis, standardization of computers across the organization; brought in outside consultants to standardize data center footprint and telephony technology; and increased. She led the Finance and Accounting teams; implemented departmental budgeting, cash management policies, internal controls and improved financial statement reporting for GAAP compliance and reporting
visibility throughout the organization. As Entity A’s Financial Consultant, Consultant A will report to the CEO, consult on all financial roles for the organization, including accounting and reporting, payroll, budget, cash management, accounts payable, and maintains the books and records in conjunction with an outside accounting firm.

**Person D: Chief Compliance Officer (CCO)**

Person D has experience with turnaround management for troubled companies to new product development and introduction as well as new company startups. He develops and implements effective strategies for both small and large business settings. Person D is a highly effective communicator with strong interpersonal skills. He is a proactive problem solver and motivational leader with financial expertise and success in identifying opportunities to improve processes and increase market share. Person D developed a turnaround management and consulting practice, Entity K, focusing on companies with sales less than $50 million. Entity K's focus is to teach its clients cash management, liquidity planning, and strategic planning skills to stabilize their businesses as a foundation for continued growth. Person D has served clients in the tightly regulated industries such as banks and other legal MM state programs.

Person D helped to establish a commercial mortgage firm and viable market shares in targeted markets. In a four-year time period, the firm’s production went from startup to more than $500 million on a trailing, 12-month basis. More than $1 billion in loans were originated, funded, and profitably securitized as CMBS. He established the firm’s underwriting policies and procedures as well as its credit compliance and approval committee (which he chaired). He developed, introduced, and maintained one of the first successful self-storage loan programs on a nationwide basis generating $381 million in loan fundings and sustaining a 15% share of the national market for such loans. At Entity L, Person D established the operations office and staff to manage portfolio of $1.3 billion in under-performing loan assets. He helped pioneer many successful alternative disposition techniques that complied with the complex operating regulations. These tools and his coaching helped others to understand complex business and litigation issues so that meaningful settlement negotiations could occur. He personally handled, or served in an advisory capacity, for the firm's most complex asset-based resolutions and litigation including business class hotels, self-storage facilities, as well as luxury and tract home builders accelerating the recovery of more than $450 million. He resolved a lender liability claim that resulted in a $1.85 million bonus fee for the firm. As Entity A’s Chief Compliance Officer, Person D is responsible for upholding the Ohio MM Program laws and rules as well as overall Facility compliance. The Chief Compliance Officer will be responsible for communicating with the regulating Departments to schedule inspections, reviewing policies and procedures and updating on a quarterly basis as well as educating the cultivation facility employees on compliance and regulations. The Chief Compliance Officer will also assist with quality control and ensure all products are tested, labeled, and packaged properly. Ensures accurate and timely reporting and maintenance of mandated documentation requirements and storage.

**Person A: Chief Science Officer (CSO)**

Person A is a graduate of University A and trained in ultrasound at Hospital A where he completed his fellowship and passion for emergency ultrasound. In 2013, he graduated from the emergency medicine residency program at the esteemed Hospital B. Immediately following graduation, Person A ’s career path led him to be the Chairman for Hospital B’s emergency department – the youngest individual to ever hold the position. Along with the responsibilities as
the Chairman, Person A is also the Director of Emergency Ultrasonography for Entity M as well as serving as Medical Director for multiple EMS agencies. Person A was a resident of emergency medicine at the Hospital B where he provided ACLS and BLS instruction to residents; served as residency ultrasound leader providing orientation; continuing education lectures and hands on training to attending physicians and residents; designed residency ultrasound care curriculum; served as site principal investigator for a research project; was project leader for the layout and supply of Hospital B trauma rooms; designed and supervised trauma resuscitation drills and education for ED staff, residents, and attendings. Person A is currently the Director of Clinical Operations for an emergency related department at a well known hospital in Ohio. His responsibilities include daily operations of the Emergency Department. Person A is also currently the Deputy Chief and Medical Director of a trauma and emergency related department at a local hospital where he is responsible for the accreditation of the hospital’s trauma center, including education and training for ED staff and attending physicians. In July of 2010 through present day, Person A is a Medical Director at local healthcare facility where he provides education and training for nursing and other staff members for the 25 employee facility. Person A is also the Medical Director and Course Instructor at a health education center where he teaches CPS, first aid, vital signs, EKG, Phlebotomy, Patient Care Technician Services, ACLS and Pharmacy Technician Services. Person A has been a part of several research projects as a Research Scholar, his projects include topics involving breast cancer, effects of alcohol, diet and more. As the CSO for Entity A, Person A will bring his expertise from the medical and clinical research fields to help establish an affiliated not for profit entity that will conduct scientific studies related to the medicinal use of MM for the purposes of providing research based information to Ohio medical marijuana patients so that they may be better informed on the proper dosages, side effects, and uses. The Chief of Science’s primary responsibility is to become and remain fluent and competent in the core subject areas of cannabis therapeutics, including areas of pharmacology, efficacy, adverse effects, dosing, pharmacodynamics, drug-drug interactions, safety, concerns of use and abuse, and recognition of toxicity, while also understanding the principals of psychoactive drugs, concepts of threshold and sequelae for qualifying conditions, iatrogenic conditions, and conceptualization of disease verses illness. The Chief Science Officer will be tasked with monitoring published peer-reviewed medical journals for information involving research in cannabinoids and work with the other members of the staff to develop Cultivation operations and protocols that reflect the most recent understanding of cannabis therapeutics pursuant to types of MM produced.

**Entity N: Security and Transportation Consultants**

Founded in 1989, Entity N is a professional, independent security consultancy serving clients throughout the United States and abroad. Entity N provides professional, independent security vulnerability assessment, technology design, master planning, and management support services to a broad range of healthcare, corporate, institutional, and government clients. As an independent consulting firm, who has assisted other clients with security programming and technology planning, Entity N can provide insights towards industry trends, best practices, and practical application of technologies from our experiences from other client engagements. As Entity A’s Security and Transportation Consultants, Entity N will be responsible for working with Entity A’s CEO with consulting on coordinating and directing all functions relating to the security of the facility and safety of employees and the security staff regarding staffing...
Consultant B: Patient and Community Relations Educator
Consultant B began her career in the MM industry in November of 2011 and by 2015 she was voted as one of the top ten influential women in the MM industry in a legal MM State. Starting as a patient service representative at a local caregiver collective, she quickly realized that many patients did not know the best way to medicate for their specific conditions. By April of 2012, she became manager of the collective, with a college background in Botany and a degree in education she began applying her skill sets to the MM industry. Consultant B had augmented her MM knowledge with an extensive dispensary management course. Consultant B specializes in educating patients new to MM and works closely with them to find the appropriate relief in conjunction with MM and their ailment. Through her years of experience in Patient Services within the MM industry, Consultant B has a broad knowledge of MM varieties/strains and their cannabinoid profiles, which allows her to recommend types of MM for specific medical conditions. Consultant B has been one of the original members of a local chapter for a National MM Networking Organization and has spoken at various national and local conferences. Consultant B has spearheaded many community projects educating on MM and its medicinal benefits. As Entity A’s Patient and Community Relations Educator, she will be actively in communication with the Executive Leadership to develop ongoing relationships with the community and oversees all efforts to inform patients, licensed provides, and the general public on the benefits provided by MM. She also is responsible for lending her expertise in establishing procedures and practices to capture patient data on MM efficacy and document research with state regulators. Additionally, this consultant will lend support for vetting, scheduling and hosting trainings in all areas related to MM education.

Consultant C– Agriculture/Horticulture Consultant
Consultant C has over 29 years of farm production management experience. Consultant C has the proven ability to produce high quality marketable product on commercial level in many different production systems, crops, and regions. He is currently the Chief Production Officer at Entity B, a state licensed MM facility, where he developed, wrote, and executed a comprehensive MM crop strategy, crop registration, cultivation staff job descriptions, organizational charts, and work flow for large commercial scale greenhouse. He was responsible for developing, writing, and executing Entity B’s production manual SOPs. He also manages the cultivation staff to execute crop production strategy with a high level of attention to detail, in compliance with state regulations. Prior to his current position at Entity B, Consultant C was Head Grower at a 22,000 sq ft state licensed indoor growing MM facility. His responsibilities were similar to that at his current position with Entity B. He also hired, trained, evaluated and directed cultivation staff as well as managed all cultivation staff, crop inputs, and environmental inputs. Consultant C has an extensive agriculture and horticulture background. He was a Product Specialist for a plant breeding company which produced vegetable seeds for the professional market, where he managed product development for tomato and pepper and engineered a successful low-tech, passive ventilation tunnel/greenhouse hydroponic production system. Including fertilization management, cultural practices, variety development, and environmental management. His agriculture background continues to extend to farming 2,000 net row acres to include: peppers, watermelon, squash, cucumbers, tomatoes, parsley, dill, cilantro, mustard.
Consultant C also has experience in developing a comprehensive Food Safety Program rated highly by professional auditing groups. As Entity A’s Agriculture/Horticulture Consultant, Consultant C will be responsible for lending his knowledge and expertise on overseeing the development of MM at the cultivation facility such as planning harvest to maximize profit and minimize loss, creating budgets, hiring and overseeing workers, supervising all maintenance, representing the facility in sales transactions and maintaining business records.

Consultant D: Cultivation Consultant
Prior to relocating to Ohio, Consultant D was a registered caregiver in a legal MM State and since 2009 leveraged his botany background to bring a scientific approach to breeding and cultivation of MM, with an emphasis on advancing plant genetics that strongly feature the medicinal properties of the plants. All plants cultivated are lab tested using gas chromatography to map their cannabinoid profiles. Consultant D has used this data to selectively breed plants with a goal of increasing the prominence of compounds such as CBD and CBN. Consultant D is skilled at producing medicine that has proven effective in managing a broad spectrum of symptoms and providing relief to patients with debilitating conditions. As Entity A’s Cultivation Consultant, Consultant D is responsible for consulting on the oversight for all of the Cultivation Staff and operation of the Cultivation Facility. The Cultivation Consultant shall lend his knowledge on Entity A’s cultivation activities, and ensure that the entire Cultivation Staff are following the Facility’s Standard Operating Procedures (“SOPs”) and maintaining appropriate timelines to ensure that the Facility produces only the highest quality of MM on a consistent basis, through the effective and efficient operation of all environmental systems and controls.

Consultant E: Legal Consultant
Consultant E is a partner at Firm A and heads up the firm’s Marijuana Group. He has a background in land use and zoning law, environmental and water issues, renewable energy and a wide variety of regulatory compliance and administrative law issues. Consultant E and the Marijuana Group assist clients with all aspects of the state’s MM law including employment and criminal issues but primarily focus on the business of MM and helping clients apply for and secure dispensary licenses from the state’s regulating department. Consultant E currently represents both licensees and outside investors and helps facilitate and document deals to bring them together. Consultant E has been working on his local state’s MM law even before it was passed, and he had significant input on the ultimate MM state rules developed. He is a frequent speaker at marijuana seminars and conferences throughout the United States and is a tireless advocate for marijuana reform in myriad interviews and appearances on TV, print and radio. Consultant E and Firm A have been committed to the entire cannabis industry from day one and remain the go-to attorneys for all cannabis needs in their state.

Consultant F: Human Resources & Labor (HR) Consultant
Consultant F is currently the HR Manager at Entity B where he helps to establish setting up and maintaining personnel files, prepare employee work agreements, and educate employees on benefit coverages and research problems with coverage. He also assists with I-9 immigration processing, manage unemployment claims, develop, recommend, and implement personnel
policies and procedures and facilitate HIPPA, COBRA, FMLA, FLSA laws to ensure compliance. Consultant F prepares and reports worker compensation claims to insurance provider, writes job descriptions for positions and prepares and implements supervisory appraisal reports and progressive discipline reports. In addition, he advises managers on Equal Employment Opportunity, Sexual Harassment, Workplace Harassment. For the past 16 years, Consultant F was also HR Director at a State’s School District where his responsibilities mirrored that at Entity B. As Entity A’s HR Consultant, Consultant F is responsible for consulting on policies, procedures and compliance relating to Entity A’s employees. Ensures all human resources activities are in compliance with local, state and federal laws, as well as implement and oversee programs related to employee benefits and initiatives. Make recommendations on potential policy changes to ensure their company offers a healthy package of salary and benefits to employees. Ensures the workplace is accommodating and free of harassment, handling complaints in accordance with policy and any relevant laws.

**TBD: Distribution and Sales Director**
The Distribution and Sales Director will be responsible for the on-going development of distribution and sales of MM and will work directly with the Cultivation Team to provide updated data on sales and marketing of MM. Roles may include outreach to the dispensary locations for trainings and events. Plans, coordinates, and organizes the distribution and sale of MM. Monitors the arrangement and transportation of MM to and from the cultivation facility. Within logistic involves inventory control, transportation and ensuring structures are in place to monitor the flow of MM.

**PART II: BUSINESS MODEL**

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

**Executive Summary**
Entity A intends to cultivate MM in compliance with local and state regulations and that will be distributed only to legal, state licensed laboratories, processors and dispensaries, with a goal to offer high quality medicine and support to assist state licensed dispensaries in treating registered patients as outlined in the Ohio Medical Marijuana Act and the accompanying rules and regulations (“MM Act”).

The Company bases our foundation for success as business professionals and cultivators on meeting the individual needs of the authorized dispensaries within Ohio, and each of their individual patients. Our plan to maintain a successful and financially sustainable operation is derived from deep business acumen in the community we seek to serve as well as the MM industry as a whole. Entity A has analyzed the MM Act and understands the importance of upholding the mission of the program in compliance with the Ohio Department of Commerce (“Department”) with respect to the State of Ohio Board of Pharmacy (“OBP”) and State of Ohio Medical Board (“OMB”).

Entity A takes pride in working with local governments and their agencies, serving as a resource for the development of a model program for Ohio; and potentially, other MM state programs to follow. Entity A has meet with city leaders and has the full support of local government to
implement the development agreement required for issuance of a regulatory permit for a MM cultivation business. The development agreement will provide anywhere from $25,000 to $225,000 on an annual basis that the local municipality can utilize to fund city programs and services to better enhance the community.

Entity A has secured a location for the Company’s Cultivation Facility and has obtained local zoning approval in addition to applying for the necessary permit. The building design reflects a quality institutional or industrial development that exceed local development standards. The proposed cultivation facility consists of approximately 31,000 square feet, cultivation area equal to 25,000 square feet plus a warehouse that will be a total of 6,000 square feet. Our Company has insured placement of our Facility is in a location that fits well within the zoning ordinances of the locality and has canvassed the location’s surrounding areas to determine that there are not any potential areas that may be negatively affected.

The Company is committed to overall security overseen by the Company’s Security Team in collaboration with local and state law enforcement agencies. The overall goal of the organization’s security efforts is to create an environment that is safe and compliant, while taking all steps necessary to prevent the potential for theft, diversion, or loss. The Company will work with the local government to maintain a detailed and extensive security plan outlined in Section 2D of this application.

As a group with extensive MM business experience, Entity A developed this application and Standard Operating Procedures (“SOPs”) detailing how operations will comply with state and local laws and regulations, how safety and quality of products will be ensured, recordkeeping procedures for financing, testing, and adverse effect recording, and product recall procedures for Entity A’s Cultivation Facility with MM best practices in mind as well as Good Manufacturing Practices (GMP), ISO 9000 protocols, clean room and Quality Assurance standards.

Entity A is committed to making a good-faith effort to recruit, hire, and train local residents to staff the cultivation facility. The cultivation facility will initially employ 25-50 employees. As the State allows the expansion of the facility, up to 75,000 square feet, the total number of employees could be as high as 100. Employment opportunities will be full-time, year-round positions in addition to part-time and contracting opportunities. All employees will have a starting wage of $15 per hour (Ohio’s minimum wage is $8.15) plus benefits for full-time employees.

Entity A’s community goal is to open a facility in a community with local support and for the Company’s presence to enhance both the economy and health of the community. Entity A intends to establish Entity A Community Fund, through which the MM operators will directly fund public/community facilities and programs. Additionally, the Company’s Patient and Community Relations Educator will work with health care providers, drug abuse treatment providers, mental health and drug counselling providers, and local police and fire departments as part of our public outreach and education program.

Entity A has thoughtfully created a six-month construction and fit-out plan that will prepare its Level I cultivation facility to begin operations on the first day of the seventh month following
issuance of its permit. Total costs to acquire, design, construct and fit-out the facility are estimated to be $4,181,099, as showcased in detail in Section 2E of this application. The Company has committed to setting $5 million aside for the entire project.

The Company will work closely with the Ohio Environmental Protection Agency to ensure all environmental impact areas will follow compliancy regulations of local community, city, state and federal agencies. We will invite local leadership to participate in ongoing internal impact studies to engage in continuous improvement in our cultivation techniques to lessen negative and increase positive outcomes on the local environment.

Facility Location and Approval
Entity A has secured the appropriate approval to operate a level I MM cultivation facility in Ohio. Entity A has received approval to operate a cultivation MM Business at the proposed location and has received a signed Section 1E, Property Owner Approval for Use Form, attached to this application. Entity A has also received a signed letter of approval from the local government for the purpose of this business acknowledged in Section IG, Notice of Proper Zoning.

Cultivation Overview
Entity A will be providing the Department an operations plan with established SOPs which will implement the secure, safe, sustainable, and proper cultivation of MM with our specific MM agricultural cultivation techniques. All pesticides, fertilizers and other chemicals shall comply with the Ohio Department of Agriculture. Agricultural cultivation techniques will be designed to be compliant with the Department, to provide the greatest impact on quality MM for patients, as well as to provide for the least amount of impact on the local environment. Entity A will implement standards and guidelines for cultivating, propagating, vegetating, flowering, and harvesting MM with safety protocols and equipment use as well as comprehensive employee training. Entity A is committed to maintaining a highly-functioning cultivation facility, in an environment where MM can be grown in a clean, safe, and efficient manner in accordance with Good Manufacturing Practices and ISO 9000 standards. Entity A will be using a strategic compartmentalized approach to the cultivation facility. This is to maximize our square footage to produce the highest quality MM for Ohio patients as well as to prevent contamination, diversion and/or pest issues. Moreover, compartmentalizing facilitates a design that does not promote production in violation of O.A.C 3796:2-2-07(D). Entity A’s team of professionals have extensive success utilizing this strategy in other existing MM state licensed and international facilities.

Cultivation will be by a hydroponic grow drip irrigation system utilizing sustainable, natural and organically based practices of growing. Site will work to obtain a nationally recognized third-party certification for the MM we produce. The third-party certification is currently certifying MM cultivations, processors, dispensaries and retail outlets in several markets within the United States that ensures MM cultivated are using international sustainable and organic practices. Nutrients and water will be digitally controlled thereby minimizing water use and runoff. Water used for hydroponic grow will be recycled. High efficiency LED grow lights will be utilized in addition to high performance HVAC and organic growing methods that are pesticide free.
Workers will be outfitted in clean-room suits, masks, gloves and foot coverings in a laboratory setting to raise, harvest and process the plants.

The cultivation facility layout will comprise of 2 flower zones (i.e. North and South) separated into 3 individual flower areas at 3,000 sq ft each. Each zone is capable of producing about 175-200 lbs every flowering cycle (i.e. approximately 56 days) or about 21-25 pounds a week on a perpetual harvest cycle. Ultimately, at full production, the facility is designed to produce approximately 6,500 lbs per year. All structures shall have ventilation and filtration systems installed that prevent MM plant odors from exiting the interior of the structure. A closed growing environment, or closed loop aeration system, will be used that keeps all environmental conditions contained within the areas in which MM are stored. Industrial filtration systems approved by the City, such as activated charcoal systems, will be used to scrub and treat any exhaust air. Moreover, we will use an odor control product like Biologic SRC3 through a misting system that is attached to a perimeter fence or the exterior of the greenhouse (i.e. on the roof) – it contains only natural ingredients and is completely safe for humans, animals, and the environment.

Quality Assurance Overview

Elements of the quality assurance plan will include best practices for the packaging and labeling of MM. In compliance with 3796:2-2-02(B)(4)(b) and 3796: 2-1-03(B)(3)(c), Entity A’s labeling responsibilities will be integrated into our inventory tracking and control system (POS) system which will ensure that our inventory related activities are traceable/recorded and that there are no undetected security breaches.

For inventory management, Entity A will use Entity O (POS), a perpetual inventory control system that identifies and tracks our stock of MM from the time it is propagated from seed or cutting, to the time it is delivered to a licensed laboratory, dispensary or processor. This software has been specifically designed to serve registered MM organizations in other states and will be customized to meet the requirements for Ohio. Entity O is the most robust seed-to-sale Point of Sale (POS)/Reporting & Compliance system available for MM businesses and is currently in use in nearly 100 locations around the country and international markets. The system was originally a biometrically-based chain-of-custody tracker designed to help state agencies monitor MM production, transportation, and sale as well as determine whether a business operated within state guidelines. The Entity O system was reconfigured to help grow-houses and dispensaries run more efficiently and effectively while remaining compliant with state law. Our POS system will support the following inventory control procedures: 1) Tracking each day’s beginning inventory; 2) Acquisitions, sales, disposal and ending inventory; 3) Ordering, Packaging, Labeling; 4) Storage, Sales, Adjustments, Audit control, Disposal of unusable MM, including a description of the MM being disposed (e.g. the quantity, strain, variety, batch number, reason for disposal, date of disposal, method of disposal, and the name, address and telephone number of the disposal company); and 5) Ensuring that the oldest stock of MM should be distributed first, unless deviation is temporary and appropriate.

In compliance with 3796:2-1-02(B)(4)(e) and 3796:2-1-03(B)(3)(e), Entity A has designed standards for the disposal of MM waste and other wastes as well as SOPs for the destruction of MM and disposal of the adulterated MM waste. In compliance with 3796:2-2-0(C)(7), our SOPs
clearly define that the disposal of all unused pesticides, fertilizers, and other chemicals will be performed in compliance with all state and federal laws and regulations and in compliance with all directions on the product label. Our Facility is designed to be compliant with 3796:2-2-05(A)(2) as to maintain or construct fencing to prevent unauthorized entry or access to waste disposal containers, disposal areas or compost areas located outside the facility. The POS will record the reason and associate it with the identifier for that plant or product. The data associated with the destruction is retrievable through pulling a simple report within the system for record keeping or reporting purposes. The report will show the person who created the destruction event, a timestamp of when the event was created, the identifiers for all plants or products to be destroyed, and the reasons the items were selected for destruction.

In compliance with 3796:2-1-02(B)(4)(f) and 3796:2-1-03(B)(3)(f), Entity A has SOPs which establish a safe, consistent supply of MM and include recall policies and procedures in the event of contamination, expiration or other circumstances that render the MM unsafe or unfit for consumption, including identification of the products involved, notification to the dispensary or others to whom the product was sold or otherwise distributed, and how the products will be disposed of if returned to or retrieved by our facility.

Recordkeeping is imperative to maintaining complete regulatory controls for inventory oversight, as well as securing full compliance for actions like accounting, security, and audits. Entity A’s management protocols, business documentation, operating procedures, cultivation records, inventory reports, and audit records will be recorded, secured, and available for review and inspection by state regulators and law enforcement officials upon request. The guiding principles of the recordkeeping protocol are to reduce any potential unlawful activity as well as ensuring the organization’s operating efficiency and compliance. In compliance with 3796:2-2-08(A-E), Entity A will keep and maintain upon the premises for a five-year period, true, complete, legible and current books and records. All required records shall be made available for inspection if requested by the Department.

Security and Safety Overview

In accordance with Rule 3796:2-2-05 of the Ohio MM Control Plan Administrative Code, the company will contract a professional licensed third-party video surveillance company that is approved by the Department, to install and maintain all video surveillance equipment at the cultivation facility. The cultivation facility will use security and surveillance systems, utilizing commercial grade equipment installed in a manner that will prevent cameras from being readily obstructed, tampered with, or disabled. This system is designed to meet the standards of the Department to prevent unauthorized access, and to prevent and detect diversion, theft or loss of medical marijuana and/or any product containing MM. A web-based video surveillance system will be installed to monitor all site and facility entrances and access points, all secured areas of the facility with restricted access, all interior spaces and rooms where MM are handled, shipping and receiving areas, cash storage areas, and other areas necessary to protect the safety of employees and the public. A professionally monitored burglary alarm system will be installed to detect entry and exit from all secure areas, panic buttons installed in appropriate locations, and door and window break sensors and motion detectors will be provided. All persons employed at the facility shall have an identification card/badge and such identification card/badge shall be visible at all times. Furthermore, all personnel will have personal panic pendants in addition to
various panic buttons located throughout the facility. All MM shall be stored and secured in a
manner to prevent diversion, theft, and loss in a pharmaceutical grade vault.
The cultivation facility will use a professionally monitored, sophisticated high-definition
surveillance system that records all activity in images capable of clearly revealing facial detail.
The company will designate and train all employee(s) to continuously monitor the security
system and surveillance system at the cultivation facility. This monitoring employee on duty will
communicate to senior management any unusual occurrences. The video recordings will also be
sent electronically to an off-site cloud-based storage site. The amount of storage needed for both
the Embedded Network Video Recorder (ENVR) device and cloud system will depend on
various factors such as a number of cameras needed, megapixels of the camera and frame rate
needed to secure the cultivation facility.
Perimeter (decorative) security fencing and controlled access gates in addition to a possible
security guard station located adjacent to the employee and visitor parking lot at the main
entrance of the cultivation facility are planned. There will be no general, uncontrolled public
access to the site, buildings, employee parking areas, or the interior of the site that relates to
cultivation. Armed security guards, through contract with a local security center, will be
provided 24 hours per day, 7 days per week if necessary. Security personnel may be armed with
the prior approval of the City Police Chief. No other person employed at the facility may be
armed while on the premises without the prior approval of the City Police Chief.
For Transportation, the Company will be using vehicles which have been equipped with the
latest bullet-resistant technology and are tracked through global positioning system (GPS) with
custom logging and reporting. They also feature high-security locks on all doors, a battery
isolator switch, a reverse camera, and a 100w multi-tone siren with public address system. These
vehicles are capable of being temperature controlled for perishable medical marijuana and/or any
product containing medical marijuana. They will also be equipped with a safe that is attached to
the vehicle inside the cargo area, which will be used for the sanitary and secure transport of MM.
This safe will feature a keypad combination that will be changed periodically.
These transportation vehicles are also equipped with a 4-point 1080p high definition camera
system that transmits live streaming footage to their command center recording all aspects of
every transaction from pickup to drop-off. These video cameras are equipped with a lens with a
wide enough angle to capture faces and activity. These cameras will be turned on whenever the
vehicle is transporting all MM and will create a recording of the camera video that will be stored
in a storage device that will be locked and inaccessible to the driver. All recordings will be
downloaded and stored for forty-five (45) days from the end of the delivery. All other applicable
state and local video surveillance requirements will also be followed.
In accordance with rule 3796:5-4-01 of the Ohio MM Control Plan Administrative Code, if the
company has any reason to believe that an actual loss, theft, or diversion of medical marijuana or
any product containing medical marijuana has occurred, the company will notify the department
and local law enforcement immediately.
Staffing and Training Overview

Entity A is committed to making a good-faith effort to recruit, hire, and train local residents for employment. The Company intends to focus our hiring efforts on individuals to include members of the African-American communities, United States Veterans, and individuals who are recovering from serious debilitating injuries. Entity A shall work closely with local organizations to hire and retain qualified candidates supporting those who are willing to work, yet unable to find employment.

Entity A is committed to the operation of a successful cultivation facility. Success is measured and reliant upon many diverse factors. A safe and secure operation is paramount and cannot be achieved without attention to the hiring process. Thus, some of the relevant factors of the hiring process will be considered necessary components to the overall security of the operation. The Company will utilize state of the art security equipment and procedures. However, the greatest threat of diversion remains within the staff. It is essential to conduct background investigations on all potential staff, including security personnel. The purposes of these screenings are to avoid negligent hiring, reduce diversion risks, and ensure only the most appropriate candidates join our team.

Screening: The CEO will conduct all final candidate interviews to ensure only professional and trustworthy individuals are hired. In addition to a criminal background check, employee candidates must also complete personality tests, undergo comprehensive training, and fulfill performance testing requirements. The pre-employment screening process will start with accurate job descriptions clearly defining the essential functions of the job and core competencies required. The job descriptions will also include a disclosure that an extensive background check will be conducted for employment consideration of the applicant and that the background check may include criminal, civil, credit and social records; education and certification verification; as well as personal interviews of references and former employers.

Interviews: The pre-employment process will progress to a structured interview. The interview questions will be in accordance to all applicable laws and regulations and will be designed to elicit useful information with regard to the applicant’s behavior. A list of questions for the interviews will be developed.

Training: Every employment candidate will be required to complete our comprehensive training program as part of a 3-month probationary phase. Additionally, ongoing continuing education training will be mandatory (at least 8 hours per year). The initial training program, taken place during orientation, will include modules on the following topics: Operational Management, Legal, Safety/Security, MM Training, Inventory/Accounting Software, Cultivation/Production Training and Transportation.

PART II: BUSINESS MODEL

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

Entity A is committed to making a good-faith effort to recruit, hire, and train local residents for employment. The business communities in which we operate will most certainly be impacted, in a positive way, as our Company shall recruit, hire, train, provide benefits to, educate, and continually employ local, qualified individuals. This cultivation facility will initially employee 25-50 employees. As the State allows the expansion of the facility, up to 75,000 square feet, the total number of employees could be as high as 100. Employment opportunities will be full-time, year round positions in addition to part-time and contracting opportunities. Wages will be $15 to $75 per hour plus benefits, the lowest wage is almost twice that of Ohio’s minimum wage of $8.15. Yearly cultivation payroll is estimated to be approximately $2million - $3million.

The economic impact of our operations within a community include not only direct employment at our facility but also resulting wages and the economic output, the supporting jobs (both indirect and induced). The impacts are presented as annual impacts for each scenario. During the Company’s initial cultivation facility size, we would operate a 31,000 sq ft facility and employ a total of 25 – 50 people with wages of $1 – 2 million and generate an economic impact of approximately $3 - $3.5 million. Indirect and induced impacts include an additional 10 jobs with total wages of $326,000 and an economic output of $2.1 million. Thus, a total of 73 jobs are projected to be created throughout the economy with wages of $2.8 million and total economic output of over $7 million. These economic impacts are recurring on an annual basis and will continue to impact the economy into the future as long as operations are ongoing.

Entity A understands the importance of giving back to the local community in which we will be operating in. Our mission is to partner with local groups and organizations to identify community members within our own backyards, that could benefit from our operations, services, and from the profits of our success. Most importantly, the Company intends to inform, hire, and educate minorities, women, veterans, disabled persons, and Ohio residents on the employment opportunities within our Company. Detailed Community Outreach, Staffing and Training Plans are outlined in Section 2B of this application.
Applicant should provide a narrative detailing support for the following:

Part I: Experience in Agriculture / Cultivation

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

Part II: Cultivation Methods and Proposed Strains

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

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

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

Part III: Product Timeline and Production Schedule

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

Part IV: Marijuana Cultivation Area Layout and Environment

Facility specifications, including the cultivation environment, layout of the marijuana cultivation area (i.e. grow tables, tiered or stacked orientation, etc.) evidencing that the applicant will comply with the requirements of Chapter 3796 of the Revised Code and will operate in
accordance with the rules promulgated pursuant to Chapter 3796 of the Revised Code. (3796:2-1-02(B)(3)(d), 3796:2-1-03(B)(2)(d))

Part V: Standard Operating Procedures

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

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

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

Part VI: Staffing and Training

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

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

#### Part I: Packaging and Labeling

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

#### Part II: Production Control

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

#### Part III: Inventory Control

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

#### Part IV: Disposal and Waste Removal

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

#### Part V: Adverse Events and Recall Procedures

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

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

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

As part of an organization with operations in other licensed medical marijuana (MM) facilities within national and international markets, Entity A (also referred to as “Company”) will preserve our current standards of Quality Assurance with a strict quality management program that includes 509 specific Standard Operating Procedures (SOPs). Our quality processes have been adopted from the highly restricted and regulated pharmaceutical industry in another country with long developed MM Laws as well as the regulations deemed by the states we operate in. We embrace the strict regulations for quality as it ensures our MM is safe, effective and produced in an environment where our employees make daily decisions based upon our core value to provide quality medicine for the patients in our community.

We are dedicated to producing the highest quality MM by employing strict quality control and plant safety measures above-and-beyond any other concerns. We do not simply produce MM, but MM strains/varieties that are tailored to treating the specific conditions qualified by the State. Our MM each have a comprehensive history that details the life cycle of the individual plant including: its genetic, the nutrients used in the manufacture, the date the plant was harvested and the results of all testing indicating not only the concentration of active ingredients such as THC, THCA, CBD and CBN but also terpenes such as Limonene, Pinene, Caryophyllene, and Myrcene will be available upon request.

In compliance with 3796:2-2-01(B)(1-2), Entity A will maintain a quality assurance and quality control plan for the cultivation of MM at our facility. Our goal is to ensure a safe, consistent product supply and minimize the deviation in quality of the production batches of MM. If Entity A requires changes to these plans, the changes will be submitted to the Ohio Department of Commerce (Department) sixty days before the effective date of the proposed changes and will allow for thirty days in our timeline for the Department to review and approve or reject the proposed changes. In compliance with 3796:2-2-07(E), Entity A will not amend or otherwise change its approved operations plan, quality assurance plan, or cultivation or production techniques, unless written approval is obtained from the Department. In compliance with 3796:5-6-02(A-C), our SOPs will enforce all prohibited activities. Paramount to our business is the ability to ensure that no distribution of MM to minors occur, any revenue of the sale of MM is secure from criminal enterprises, no trafficking or diversion of MM across state lines exists and no trafficking of illegal drugs or illegal activities has occurred on the premises. Entity A prohibits illegal or unauthorized possession or use of a firearm at the facility.

In compliance with 3796:2-2-07(A-G), Entity A acknowledges all cultivator prohibited activities. Entity A will not sell MM in any form to a patient/caregiver; permit the consumption of MM in any form on the premises; grow a prohibited, unregistered or unapproved form of marijuana; produce or maintain MM in excess of the quantity required for normal, efficient operation based on patient population and consumption reported in the inventory tracking system; amend or change its approved operations plan, quality assurance plan, or cultivation or production techniques without written approval obtained from the Department; change the use/occupancy of the facility without prior written notification and approval from the Department; sell plant material that exceeds thirty-five percent THC content; directly or indirectly discriminate in price between different processor or dispensary facilities using a like grade, strain, brand, quality, and quantity of MM. However, Entity A may base price differentials based on differences in the cost
Our SOPs are designed to provide each employee, work area, and process clearly defined rules, goals, and replicable and compliant practices to ensure Entity A provides patients/caregivers, our employees, the Department and our community with business operations reflective of the mission of the Ohio MM Program. In addition to the procedures required by the Department, our own SOPs have been developed to cover the following operational categories: Corporate Operations, Quality Control, Quality Assurance, Maintenance, Production Operations, Packaging, Regulatory Affairs/Compliance, and Customer Service. These SOPs meet the requirements for all guidelines of the Good Production Practices and are available to the Department upon request.

Part 1: Packaging & Labeling

Elements of the quality assurance plan will include best practices for the packaging and labeling of MM. In compliance with 3796:2-2-02(B)(4)(b) and 3796: 2-1-03(B)(3)(c), Entity A labeling responsibilities will be integrated into our inventory tracking and control system (POS) system which will ensure that our inventory related activities are traceable/recorded and that there are no undetected security breaches.

**Bulk Packaging and Labeling MM:** After harvest, MM will be stored in bulk. Break down of the Bulk Packaging will occur in conjunction with and in preparation for sale and transport of MM to licensed dispensaries and processors. Bulk packaging of MM is the responsibility of the inventory team and manager. They will complete a pre-packaging inspection checklist to ensure the designated processing area is clean and that all necessary equipment has been sanitized. All applicable daily scale check logs will have been verified prior to beginning weighing and packaging. If more than one lot is to be bulk packaged, the team will ensure that each variety/strain is done independently of the other to reduce the risk of cross contamination and ensure traceability. The team will prepare the MM lot to be bulk packaged in the designated processing room. Once the correct MM, lot and total number of bins are present for bulk packaging, the team will begin processing one bulk MM at a time, record the net weight of each and verify the weight against the record label. The cultivation staff will record each net weight in grams on the log and the bulk packaging record. After weight is verified the bulk MM will be placed into a vacuum sealed bag with the strain name, finished good lot number and bin #.

Cultivation staff will record the total number of bags prepared for each lot, the total number of cartons packaged, and the net weight of each unit. To ensure cleanliness, the staff will sanitize all empty containers and store them in the storage room. At the beginning of each day, the cultivation manager will inspect all bags to ensure the vacuum seal was not tampered with and perform a physical count and verify against daily logs and reports from the POS. If at any time a discrepancy is noted, perform a re-count or re-weigh. If the discrepancy still exists after the re-count/re-weigh has been performed, then an investigation is to be conducted.

**Packaging and Labeling Testing Samples for Licensed Laboratories** - From these bulk units, samples of MM will be provided to a state licensed laboratory for testing. The samples will be packaged, labeled, tracked in compliance with the Department.
After testing, new labels will be generated to include total weight in grams of plant material in each package, the identification of the independent testing laboratory along with the laboratory analysis profile, and a list of all active ingredients including the percentage content by weight for the following cannabinoids, at a minimum: Delta-9-tetrahydrocannabinol (THC); Delta-9-tetrahyrdrocannabinolic acid (THCA); Cannabidiol (CBD); and Cannabidiolic acid (CBDA). Each product label will display an expiration date which will not exceed one calendar year from the date of harvest. Only after testing results are present will the MM in bulk be available to break down for licensed dispensaries and processors.

**Packaging and Labeling for Licensed Processors** – Bulk packaging for Processors will be in one pound units equal to 453 grams per unit. In compliance with 3796:2-2-02(A)(1-2), Entity A will package the MM in a Department approved tamper-evident, light-resistant package prior to distributing plant material to a processor. All packaging will be selected to maintain the integrity and stability of the plant material. Entity A will utilize specialty cultivation bags in our production and transport. These provide a child resistant exterior as well as odor mitigation. We will employ this along with traditional vacuum sealed bags when necessary.

All bags will be placed into a secured box which is sealed with tamper-proof tape. At each step of packaging, inventory employees will document, record and sign for the chain of custody of MM. Entity A will also provide either online or hard copies of all laboratory test results to the processor or in the manner defined by the Department.

Warning labels will be highlighted with the specific verbiage provided by the Department. "This product is for medical use and not for resale or transfer to another person. This product may cause impairment and may be habit-forming. This product may be unlawful outside the State of Ohio." For the safety of youth, we will propose to the Department the additional label “Keep Out of the Reach of Children”.

**Packaging and Labeling for Licensed Dispensaries** - We will be packaging final MM into units of gram, eighths, quarters, half ounce and ounces for sale to dispensaries. In compliance with 3796:2-2-02(B-D) and to mirror the medical market of pharmacology, Entity A will package the MM in Department approved child-proof, tamper-evident, light-resistant pharmacy grade pill containers. All packaging will be selected to maintain the integrity and stability of the plant material.

In compliance with 3796:2-2-02(E), Entity A will provide dispensaries free samples of plant materials. A free sample shall be packaged in a sample jar protected by a plastic or metal mesh screen to allow patients and caregivers to smell the plant material before purchase. Each sample jar will not contain more than three grams of a strain of plant material. The sample jar and the plant material within will not be sold to a patient or caregiver and shall be destroyed by the dispensary after use. The dispensary shall document the destruction of every free sample in accordance with the rules established pursuant to Chapter 3796. of the Revised Code. We will propose to the Department the sample jars also comply with general dispensary labeling regulations and will provide the same data as listed for dispensary packaging.
It is the responsibility of the cultivation team to ensure procedure compliance in the packaging of all MM. The cultivation team will verify that the daily scale log is up to date, complete a Room Pre-processing inspection checklist and log into the POS with their unique personal username and password. The cultivation staff will visually verify and confirm the correct product name and lot number of each MM unit and each individual bulk packaged polybag for the bottling run. They will record the MM unit start weight as the product being broke down into sellable units. Gloves must be worn during this process. Using the bench top weighing scale, staff will weigh the stainless-steel bowl to be used. After resetting the weight of the bowl on the scale, staff will use sanitized scissors, cut the vacuum sealed bag open across the top, being careful not to spill any product. They will empty all the contents of the bag directly into the bowl on the scale and then weigh and record the net weight of the product on the pre-processing checklist. Staff will only open one bag at a time and complete the weighing process before opening another bag after weighing the product from each bag. Before commencing a second bag, they will scan the bulk lot barcode of the bag and place additional bulk lot stickers onto the Pre-Processing Inspection Checklist form.

To ensure the best quality of MM for the dispensaries, they will trim any stems and perform a visual quality inspection of the buds, using the lighted 60x-100x magnifier. If any quality issues are noted, place the product in a plastic bag on the countertop and notify the cultivation manager. Using the dispensing room scale, staff will place an empty bottle on the scale and tare the weight, ensuring the scale is set to zero. After weighing out the desired quantity of product and ensuring it meets minimum standards of weight within 95-105% of the label claim, staff will place MM into the bottle.

Staff will record net weight of the bottled product in the scanner. A bottle identification label will print automatically with the information about the bottled product (product, lot number, packaged date, and net weight). After removing the filled bottle from the dispensing scale and firmly securing the child resistant cap onto the bottle, staff will then place the bottle identification label on the bottle. These steps are repeated until the entire bag of bulk product has been packaged.

To further protect the MM, Entity A will utilize an electromagnetic induction sealing machine to provide bottle sealing/neck banding. Staff will turn on the power switch verifying that both the voltage and sealing time lights on the panel are on. They will adjust the sealing time to 1.5-1.7 for a 53 mm or 89 mm cap. After aligning the bottle cap with the center of the inductive head, they will press the button at the top of the inductive head. The value of the thermal setting will count down. The sealing is not finished until the setting value recovers. Staff will wait approximately 20-30 secs before removing the cap and inspecting the seal. The seal should be smooth and tight and 100% of the bottle opening is covered.

To ensure the MM is packaged in a compliant, safe, and secure manner, the cultivation manager or lead staff person will randomly select three bottles of dried product from the beginning, middle and end of the packaging process and verify that the induction seal is fully intact and is covering the entire opening. For all bottles, staff will affix the appropriate product/strain label to each bottle. Prior to completion of labelling, staff will affix one product/strain label to the back of the Bottling Record, for each Packaging Run.
Labels will be affixed to every package with information provided in English. Every label will include Entity A name and license number, the name and license number of the dispensary receiving the shipment, a product identifier, the registered name of the MM (strain), a unique identification number to match the MM with a batch and batch number to facilitate any warnings or recalls and the date of harvest, final testing and packaging. Warning labels will be highlighted with the specific verbiage provided by the Department: “This product is for medical use and not for resale or transfer to another person. This product may cause impairment and may be habit-forming. This product may be unlawful outside the State of Ohio.” For the safety of youth, we will propose to the Department the additional label “Keep Out of the Reach of Children.”

Completion of the packaging process includes: Packaging an entire polybag of dried bulk; weighing any remaining dried bulk (ensure the weight of the bowl is tallied); placing any remaining dried bulk in a vacuum sealable bag, sealing it and labeling it; weighing the remaining dried waste, and placing it in a vacuum sealable bag, sealing it and labeling it; and recording the waste from the process (either dried or oil) in the “Vault Production Waste” log book to be destroyed per regulations.

At the end of the process, staff will print a bottling record from the POS. The bottling record will contain the bottle ID, the number of grams per bottle, who packaged the bottle, the number of bottles packaged and the total net weight packaged. On the bottling record, staff will add the starting weight, net weight of remaining bulk, net weight of waste (if applicable) and the Final % packaging yield. The packaging yield must fall within 97-103%.

*For all MM* - Our POS for inventory oversight, compliant labeling and packaging will incorporate routine audits of all products at multiple points in the supply chain within the operation. At the time that labels are ready to be printed, the Inventory Manager will assure that the appropriate label template is being utilized for the corresponding product. Once the Inventory Manager confirms that the proper label template is being utilized, packaging and labeling staff members will affix all labels on product packages to conform to the specific batch of a given product. Once a product batch is completed, the contents will be segregated for a final inspection by a designated packaging and labeling team member to ensure all labels are accurate, include proper printouts, and have been affixed properly and conspicuously on all packages. When all packages have been inspected and confirmed to be correct, all packages will be moved to the secure room for storage prior to being transported to a licensed dispensary.

The inventory system pulls variable information about each product, and prints only the fields designated within the template currently utilized. This will prevent any of these items from being printed on any label generated by the inventory system and team. All label templates will be designed by the Inventory Manager to conform to the requirements listed above. As an extra layer of redundancy, packaging and labeling team members, transportation specialists, and other members of the cultivation team will be trained in advance on the labeling prohibitions, and will include these restrictions on their review of items made available for delivery to licensed laboratories, dispensaries and/or processors.
If applicable, we will add an approval or certification logo of a third-party certifier of cultivation practices. Any third-party certifiers will not have direct or indirect financial interest in any MM entity licensed in the state of Ohio and these certification protocols used by the third-party certifier will have been reviewed and approved by the Department.

Entity A will ensure that labels will not contain any false or misleading statement or design, depictions of the product, cartoons, or images that are not registered with the Department (including any insignia related to a governmental entity), any sum totals of cannabinoids or terpenes, except THC content as defined by the Department. As part of our overall Quality Assurance Plan and in compliance with 3796:5-7-01(A-G), Entity A will embrace and support the definition of “advertisement” to be any written or verbal statement illustration/depiction created to induce sales using or a combination of letters, pictures, objects, lighting, effects, illustrations, or other similar means and includes brochures promotional and other marketing materials. No advertisement will be pursued if it has a high likelihood of reaching persons under the age of eighteen. We will not encourage promotion or otherwise create any impression that marijuana is legal or acceptable to use in a manner except as specifically authorized by Chapter 3796. of the Revised Code.

Entity A will submit to the Department and pay any applicable fee prior to the use of a name, logo, sign, or other advertisement for approval. All submissions will include a brief description of the format medium and length of the distribution; verification that an actual patient is not being used on the advertisement; verification that an official translation of a foreign language advertisement is accurate; annotated references to support statements related to effectiveness of treatment; and a final copy of the advertisement including a video where applicable in a format acceptable to the Department. We will provide for at least 15 business days for the Department to review materials until September 9, 2019 when the department shall have 10 business days to review materials. Entity A will comply with the decision of the Department and provide a specific disclosure to be made in the advertisement in a clear and conspicuous manner if the advertisement would be false or misleading without such disclosure; change the advertisement necessary to protect the public health safety and welfare; or withdraw the proposed advertisement.

We will not place or maintain an advertisement of MM including paraphernalia within five hundred feet of the perimeter of a prohibited facility, a game arcade where admission is not restricted to persons aged twenty-one years or older, or a business where the placement of the advertisement targets or is attractive to children as determined by the Department. Entity A will not be utilizing billboards, radio or television broadcast including a system for transmitting visual images and sound that are reproduced on screens and includes broadcast cable on-demand satellite or internet programming for advertising. We will not use handheld or other portable signs. The Company will respect public places and will not place handbill leaflets or flyers directly handed, deposited, fastened, thrown, scattered cast or otherwise distributed to any person nor left upon any private property without the consent of the property owners, in a vehicle public transit vehicle or public transit shelter; or in a publicly-owned or operated property.

Entity A will not include any image bearing a resemblance to a cartoon character fictional character whose target audience is children or youth or pop culture icon; market, distribute, offer,
sell, license or cause to be marketed distributed offered sold or licensed any apparel or other merchandise related to the sale of MM to an individual under eighteen years of age; not suggest or otherwise indicate that the product or entity in the advertisement has been approved or endorsed by the Department, the state of Ohio or any person or entity associated with the state of Ohio. All advertising will be consistent with the medicinal and approved use of MM and only support the use of MM for a qualifying medical condition. Advertising will not be false or misleading. We will not depart from the MM registered name including marijuana slang terms and similar references. We will respect competitor’s products and will not employ any obscene or indecent terminology or imaging. We will only promote the safety or efficacy of MM which is supported by substantial evidence or substantial clinical data.

After confirming the age affirmation of at least eighteen years of age by the user, our website will provide the following: Entity A business address, contact information, and services provided. We will not allow for direct engagement between consumers or user-generated content or reviews; provide a medium for website users to transmit website content to individuals under the age of eighteen; target a consumer group with a high likelihood of reaching individuals under the age of eighteen; display or otherwise post content that has not been submitted to the Department. The site will not transact business or otherwise facilitate a sales transaction to consumers or businesses; or maintain a web presence that would otherwise violate rule 3796:5-7-01 of the Administrative Code. As MM moves through the production chain at the facility and are finalized for packaging and labeling. Our staff will verify the identity and contents of each product from the electronic tracking system, while also conducting a visual inspection of each product to ensure the contents match the prepared label. No product will be labeled by a staff member if its contents to do not conform with the description included in the electronic tracking system.

Part II: Production Control
Entity A has extensive experience in the MM industry. As such, each of our facilities are constructed and maintained to achieve our goal as the gold standard for the MM industry. A hi-tech biometric security system controls access to all areas of the building. Every square foot of the facility and piece of equipment is meticulously cleaned, sanitized and documented by trained personnel. We employ Good Manufacturing Practices (GMP) to ensure that all MM is consistently produced and controlled according to quality standards. GMP is designed to minimize as many risks as possible involved in a pharmaceutical production.

Production and Systems Control Factors - Entity A strictly governs Quality Control and Safety to include facility sanitization and the maintenance of the health and integrity of the plants. Our SOP’s apply cleanroom, Currently Good Manufacturing Practices (cGMP) and ISO 9000 quality standards to all cultivation rooms and processes. The facility is regularly scheduled to be sanitized by organic-certified cleaning agents. Additionally, materials used for the harvest and storage of dried cannabis plants will be consistent with FDA food preparation protocols - food-grade and/or pharmaceutical-grade sieves and plastic containers will be used for processing and storage.

Standards of Excellence - Entity A is committed to ensuring that only the highest-quality medicine is made available to patients. According to the American Herbal Pharmacopoeia
Cannabis Monograph, MM that is to be used for medicinal purposes should be free of foreign matter, as well as molds and bacteria that have a high likelihood of pathogenicity. Microbial standards must be adopted based on those required for non-sterile pharmaceutical preparations for use by inhalation. For medicinal purposes, differing formulations of CBD, THC, and THCA will be targeted to specific qualifying conditions. Providing a balance of organoleptic qualities (taste and aroma) is critical to patient satisfaction. We support the use of good agricultural practices (GAP) in the growing, harvesting, drying, and storage of MM, as well as the use of verified testing methodologies to maintain strict quality control practices to ensure the purity and quality of all cannabis for medicinal use. Our approach to quality control aligns with the standards of the American Herbal Pharmacopeia and features a range of processes which ensure only the highest quality medicine will be made available to our patients. We will work closely with the licensed laboratories to ensure the best possible medicine for patients. We will continue to work with a well known MM organization and it’s patient focused program, which has in place standardized quality control standards and processes for use by cultivators, processors, dispensaries, and independent laboratories. Our partnership with this MM organization ensures that our protocols are best-in-class and ensure the very highest standards for the medicine we provide to patients. We are fully prepared to bring our knowledge and relationships regarding product safety and quality assurance to bear in assisting the Department with establishing quality MM.

**Supply Controls** - We understand that our products are only as good as our supply chain. We inspect and test all our raw materials and they are only used if they too meet our exacting quality standards. We also regularly conduct site visits and audits of our key suppliers to ensure that they meet our strict requirements for quality, consistency and safety.

To achieve our standard for GMP and ensure excellence in quality controls, Entity A executes concise procedures for material/supplies specifications which require a Certificate of Analysis and a Certificate of Manufacture. A Certificate of Analysis is a document issued by our Quality Assurance process and will confirm that a regulated product meets its product specification. A Certificate of Manufacture is an authenticated document by a manufacturer certifying that the goods have been produced and are ready for sale. Our cultivation and inventory managers are responsible to make sure this procedure is followed when dealing with raw material in receiving, evaluating, releasing and rejecting of any materials. This will ensure that appropriate staff are responsible to collect samples, obtain the current spec sheets, evaluate the received material as per the Certificate of Analysis from the vendor and complete the results section of the specification review. The Cultivation Manager is responsible to review, release or reject a material based on the evaluation results.

Upon receipt of any raw material including additives for the MM cultivation process, the inventory manager assigns a product code in the POS for tracking purposes. The staff member will retrieve any current testing specification for the received raw material and records the following information on the spec: receiving lot number and supplier’s lot number. It will contain the actual results obtained from testing performed as part of quality control of an individual batch of a product.
The Certificate of Analysis are attached to the spec sheet and verified that the material description and identification match that of the Certificate of Analysis. A Certificate of Analysis must accompany the delivery of every raw material and be submitted to the Quality Department. If a certificate of analysis or guarantee is not available, it must be requested from the supplier. The cultivation staff will review the specification sheet to determine what testing/criteria are required for raw material release.

The team will assess the appearance, color and odor of the raw material and record all test results and initial and date next to the result reported on the form. If an “Out of Specification” result is observed, then record all details, mark result with an asterisk (*) and immediately contact the manager for further instructions. A photo may be required. Then staff will forward all completed Raw Material Specification/Analytical Reports to the manager for review and final disposition.

All raw materials must be quarantined before being utilized in the general cultivation area as well as any MM producing activities. This is to provide additional safeguards for the protection of the MM and the facility as a whole.

If all the required testing parameters are within their specified limits, the designated Quality personnel will release a raw material for production use. Materials that test outside the specified parameters may still be used for production with reasonable justification or modification. The justification must be noted on the spec sheet with a non-conformance report. This will be the exception not the rule for our decision-making in the selection of raw materials. If a raw material fails to meet a specified criterion, staff must notify management. The affected raw material will be labeled with a “REJECTED” label and physically moved to a rejection location within the warehouse until its return or destruction is completed.

**Integrated Pest Management/Pesticide and Fertilizer Use** - From water sampling and nutrient profiling to integrated pest management systems and in-depth record keeping, Entity A will track and control every step of the growing process. Entity A cultivation team will develop the nutrients and proportions that make up our organic fertilizer blends. This significantly reduces the risk of unwanted chemicals that can be found in pre-mixed fertilizers from making their way into our products.

We employ biological controls – not unauthorized chemical pesticides – to ensure that optimal growing conditions are maintained. In compliance with 3796:2-1-02(B)(4)(a) and 3796:2-1-03(B)(3)(a), Entity A has developed an integrated pest management (IPM) protocol for its proposed cultivation area in the cultivation facility that strictly complies with state laws and regulations to produce MM. The limited use of pesticides by Entity A will apply to all products used, as part of the IPM protocol, we will include permitted active ingredients under state regulation and approved for use in greenhouses or food crops. In compliance with 3796:2-2-01(C)(1)(a-b),(3-4), all pesticides will meet the requirements and will be registered with the Ohio Department of Agriculture to meet either of the following requirements: (a) Registered with the United States Environmental Protection Agency under section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act, 7 U.S.C. 136-136y (2012); or (b) exempt from registration under 40 C.F.R. 152.25(f) (2015) and the active inert ingredients of the pesticide product are
authorized for use on crops or plants intended for human consumption by the United States Environmental Protection Agency.

In compliance with 3796:2-2-01(C)(6) (a-l), Entity A will maintain records of all pesticide, fertilizer, or other chemical applications for at least five years and will be made available to the Department upon request. Each of these application records will include the following information: a) Date and time of application; b) Stage of cultivation process; c) Date when the plants in the application area were moved to the flowering stage, if applicable; d) United States Environmental Protection Agency registration number, if applicable; e) Analysis of the fertilizer applied; f) Application site, which shall be identified by the location legend maintained by the cultivator; g) Name of the product being applied; h) Amount applied; i) Unique plant identifier or other information that identifies which plants received the application; j) Size of the application area; k) Name of individual making the application; and l) Comments or special conditions related to the application.

Pesticide application records will be completed within 24 hours upon application completion at our facility. All records will be made available upon request to the Department or its authorized agents and medical personnel or first responders in an emergency. Records will also be made available to the Ohio Department of Agriculture upon request. Entity A will comply with any future regulations provided by the Ohio Department of Agriculture, acting with the cooperation of the Department that establishes a quarantine to prevent the dissemination of plant pests within this State or to prevent or delay the introduction of a plant pest into this State from any country, state or territory. If no such order is provided by any department, we will upon finding a plant pest in a facility that has the potential to cause severe damage to other cultivators and processors or to agriculture in general, will enact a quarantine order. The quarantine order will establish conditions and restrictions determined to be necessary to prevent or reduce the movement of the plant pest from the quarantined area. Vehicles or any means of conveyance suspected of carrying the plant pest may also be subject to quarantine and a treatment order may be issued as necessary to eradicate the plant pest. The quarantine order may regulate the planting, growing or harvesting of any immature MM plants or medical MM plants that serve as a host or reservoir for the plant pest within the quarantined area and may include prohibiting the processing of a specific batch of medical MM within a specific geographic area or during a specified time. An immature medical MM plant or medical MM plant suspected of harboring the plant pest may be ordered to be treated or destroyed. In compliance with 3796:2-2-04(C)(2)(b), Entity A will record the batch number, weight, and strain name associated with each batch that has been quarantined for testing or ready to be distributed to a processor or dispensary.

In compliance with 3796:2-2-01(7)(8), Entity A will dispose of all unused pesticides, fertilizers, and other chemicals according to all state and federal laws and regulations, which require compliance with all directions on the product label. Additionally, our SOPs prohibit the use of a pesticide, fertilizer, or other chemical by a cultivator that is inconsistent with the product’s label or in violation of the Administrative Code.

**Quarantine of Infected Plant** - In the event that disease, mold, mildew, rot, or pest infestation are detected in plant roots, grow medium, stems, stalks, leaves, or flowers, all infected plant or plant material shall be immediately removed, quarantined, treated, and/or destroyed, and
rendered unusable. Entity A has a separate and secure area for the temporary storage of MM that is awaiting disposal, pursuant to the MM Act. Proper sanitation is maintained in the Facility and its various areas, and proper rodent, bird, and pest exclusion practices are continuously employed. If there is an outbreak of mold or botrytis, Entity A staff shall employ methods to prevent the spread of additional spores in the environment. Infected plants are identified, bagged and sealed. Cultivation staff inside the particular room shall tie the bag up, spray it with a hydrogen peroxide solution, and hand it off to staff who is not contaminated, not standing inside the room, and then that Facility staff member shall move the bag into the quarantine room, and dispose of it as specified in the Facility-specific SOPs.

Part III: Inventory Control
For inventory management, Entity A will use Entity O (POS), a perpetual inventory control system that identifies and tracks our stock of MM from the time it is propagated from seed or cutting, to the time it is delivered to a licensed laboratory, dispensary or processor. This software has been specifically designed to serve registered MM organizations in other states and will be customized to meet the requirements for Ohio. Entity O is the most robust seed-to-sale Point of Sale (POS)/Reporting & Compliance system available for MM businesses and is currently in use in nearly 100 locations around the country and international markets. The system was originally a biometrically-based chain-of-custody tracker designed to help state agencies monitor MM production, transportation, and sale as well as determine whether a business operated within state guidelines. The Entity O system was reconfigured to help grow-houses and dispensaries run more efficiently and effectively while remaining compliant with state law.

At present, the Entity O system offers a variety of features for Cultivation Management including: (1) Bar-coding technology used on all plants to ensure a safe and compliant process from seed-to-sale Nutrient and pesticide tracking; (2) Add and track strains/strain types/strain notes & strain medical benefits; (3) Plant note taking and reminders (ensures product is tended to in the appropriate manor); (4) Create cultivation rooms (know the exact room/location plants are located); (5) Genealogy Tracking (see which mother plants produce the best yields; also allows tracking of a possible bad batch back to the parent plant from which it derived); (6) Plant Auditing (By specific room or total); (7) Waste Tracking (Leaf, stems, shake, trim, etc.); (8) Batching options (collect by-products and batch them together based on need); (9) Tasked based registrant reminder system (SMS and E-mail); (10) Biometric Chain of Custody Tracking (know who handled the plants, when, and why in real time); (11) Automated transportation manifest log with the ability to add drivers/vehicles/license numbers; and (12) Harvest/cure one plant or multiple plants at once but always be able to track back to the original bar-code it derived from Plant phase tracking.

Entity A Inventory Management through this POS will include: (1) Create new inventory, Inbound and outbound transfers; (2) Accounts receivable/payable; (3) Wholesale transfers; (4) Inventory audit feature; (5) Tax collections/tracking; (6) Adjust/convert inventory; (7) Set price points; (8) Add vendors; (9) Vendor document scanning; (10) Create barcodes/use existing product bar-codes; and (11) Documentation for all transfers from the facility will include the date and time of the transfer as well as the amount, form and type of marijuana strain(s) or products transferred.
Our POS system will support the following inventory control procedures: (1) Tracking each day’s beginning inventory, acquisitions, sales, disposal and ending inventory; (2) Ordering; (3) Packaging; (4) Labeling; (4) Storage; (5) Sales; (6) Adjustments; (7) Audit control; (8) Disposal of unusable MM, including a description of the MM being disposed (e.g. the quantity, strain, variety, batch number, reason for disposal, date of disposal, method of disposal, and the name, address and telephone number of the disposal company); and (9) Ensuring that the oldest stock of MM should be distributed first, unless deviation is temporary and appropriate.

Robust inventory reports in the inventory management system show current inventory levels. Each product has a unique transaction history that shows every sale and addition/removal from inventory, as well as a date/time stamp and the user ID of the registered registrant who executed the transaction. Customizable entries designate reasons for inventory adjustments. Only Type 1 key employees designated as having oversight privileges for the inventory control system are able to view inventory reports. Sales and inventory reports can be generated and customized based on a wide variety of data fields.

The Inventory Department will be responsible for four main functions within the facility: Inventory and cash control; Purchasing and receiving MM; Quality control and; Inventory and sales reporting. The Chief Operating Officer will have primary oversight of our facility’s inventory management system (aka the point of sale system).

**Inventory and Cash Control** - The Inventory Department will be responsible for the storing, tracking, counting, and safekeeping of cash, MM and all cultivation supplies. The Inventory Department will also be responsible for investigating and reporting all mysterious losses or disappearances, and ensuring mysterious loss and/or disappearances are minimized. All loss and/or disappearance will be reported to the Director of Security and the Quality Assurance Officer. The Director of Security will be responsible for completing Incident Reports and reporting inventory losses to the Department.

**Quality Control** - The Inventory Department will be responsible for the content and quality of all products sold by the facility through storage, sale or disposal. The Inventory Department will be rigorous when enforcing quality control standards to ensure that products that do not meet our standards are not distributed.

**Inventory and Sales Reporting** - The Inventory Department will be responsible for all inventory- and sales-related recordkeeping and Department-required reporting.

**General Guidelines** - In compliance with 3796:2-2-01(3), Entity A has developed a comprehensive protocol for inventory tracking, security, and requirements where all products will be accounted for from the moment a seed is planted through the final preparation and packaging of products for delivery to licensed dispensaries, processors and laboratories. Tracking requirements included in our plan include full electronic records of the Company’s inventory of MM produced at the facility as well as any MM disposal, recall, or return of MM to the facility due to quality issues.

**Cultivation Specific:**
In compliance with 3796:2-2-04(A-D), Entity A will track any information the Department determines necessary for maintaining and tracking MM through the inventory tracking system. The Company will maintain all inventory in an electronic tracking system which must include an accounting of and an identifying tracking number for:
- The number, weight and type of seeds.
- The number of immature MM plants.
- The number of MM plants.
- The number of MM ready for sale.
- The number of damaged, defective, expired or contaminated seeds, immature MM plants, MM plants and MM awaiting disposal.

Additionally, the Company will establish inventory controls and procedures to conduct inventory reviews and comprehensive inventories at its facility to include the following:
- Inventory reviews of MM plants in the process of growing and MM that is being stored for future sale shall be conducted monthly.
- Comprehensive inventories of seeds, immature MM plants, MM plants and MM shall be conducted at least annually.
- A written or electronic record shall be created and maintained of each inventory conducted under subsection
- That includes the date of the inventory, a summary of the inventory findings, and the names, signatures and titles or positions of the individuals who conducted the inventory.

Inventory audits are required by our SOPs. Although not required by the Department, we will implement Daily and Monthly Inventory Audits. Our Annual Audit will be in compliance with the Department and all its current and future regulations.

Each day the manager will provide a blank inventory count sheet for each area of the cultivation. This blind count at the start of every day is designed to provide not only accountability for the plants as they move through the growth cycle but also a tracker of performance to remain compliant in providing a sustainable flow of inventory. All areas are counted utilizing a manual, visual count and then using the POS RFID scan. The data is recorded on the sheet and returned to the manager on duty. Employing the POS, the manager will run the inventory report and compare the blind count data to the POS inventory count. Any discrepancies will trigger a manual re-count by a different employee (still exercising the blind count system). A secondary discrepancy in the count will require a final count by a third employee. Only after this final count, will the type 1 key employee make any adjustments to the inventory system and only after providing appropriate documentation. Any discrepancies will be handled in compliance with the Department regulations and as defined in our SOPs in “Adverse Events and Recall Procedures”.

In the Mother/Cloning and Cultivation Areas, each plant is counted by variety (strain) and is identified by the height of the plant. Once a plant is moved into the Drying Room, it is weighed (wet weight) and hung to dry. Although the plant weight is recorded, to maintain daily counts the hanging plants at this stage will be manually counted until they are ready to move to the Cure Stage. Plants in the Cure Stage have been re-weighed to determine the dry weight. In the POS, the MM now becomes a weight-based inventory item. Based upon industry standards, the final
dry weight will be a percentage of the wet weight. Any unacceptable deviation to this must be escalated as a discrepancy. All MM in the Cure Room will now be inventoried by variety and weight in the inventory count. MM plant material remaining (Trim) will also be weighed and logged into the POS. Finally, all packaged MM for either licensed dispensaries, laboratories or processors, is stored in the Secured Storage Room. The items in this room are counted by variety and weight.

At the end of the day, all areas are re-counted using the same blind count. This daily closing inventory report will now become the opening inventory for the next day. By tracking the inventory at start and closing of day, we can provide an accurate count of MM by variety, unit, maturity, and weight. Daily counts also reduce any opportunity for diversion or loss as well as provide a tool for forecasting production.

At the end of the month the cultivation manager will run an end of month plant status report for each area of the facility. The cultivation staff will do a blind count of each room with plants, and will hard weigh all MM in Dry/Cure as well as do a hard count of all packaged MM in the secured room. Any prepackaged units (pounds) of product will be re-weighed monthly to ensure there has been no tampering or adjustment of product weight. The two reports for each area will be compared for any discrepancies. The final monthly plant report will be provided to the CEO and CFO for an audit against production goals.

Additionally, the manager will also initialize an end of month sales report. This report will show sale of MM to licensed dispensaries as well as processors. It will also log and track the transfer of MM to state licensed laboratories. The manager along with the CFO and/or CEO will review the reports to compare them to the financial tracking of all sales. All equipment and supplies as well as nutrients, additives, etc will be counted, logged and inventoried. These items are also entered into the POS so that they can be accounted for and documented for any inconsistencies.

The manager will also extract a discrepancy and adjustment report. This will provide management a list of all changes in the POS tracking. The report will be used to help identify any potential manual adjustments made in error or by design that would cause an opportunity for diversion. It will also help to identify areas of improvement for better plant management throughout the growth cycle. Mandatory monthly audit reports are part of our SOPs as part of our best practices for a compliant, safe, diversion-free workplace.

Annually, as a condition for renewal of a cultivator license, our type 1 key employee shall conduct a physical, manual inventory of the MM on hand and compare the findings to an annual inventory report generated using the inventory tracking system. 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 3796:5-4-01. All inventory, procedures and other documents required by this rule shall be maintained on the premises and made available to the Department always. In compliance with 3796:2-2-04(E), all our inventories, procedures and other documents required will be maintained on the premises and made available to the department at all times.
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, the cultivator shall securely attach a tag to the plant or the plant's container that includes, at a minimum, the following information: Entity A’s name and license number; the registered name of the strain; the unique plant identifier; and general information regarding the plant that is used for traceability. Entity A will store MM inventory on the premises in a designated, enclosed, locked facility identified in our facility plans and specifications submitted to the Department and accessible only by authorized individuals. Entity A will not prohibit members of the Department, a Department's designee, law enforcement, or other federal, state, or local government officials from entering any area of a cultivator if necessary to perform their governmental duties.

Using our POS and integration with any electronic tracking system selected by the Department, Entity A is confident in its capacity to maintain detailed records of all products within its facilities, as well as reduce and prevent possibilities of product diversion. A key component of the diversion prevention activities includes inventory controls that mandate regular, daily audits of all packages returned to the secure room at the close of business. These counts will be notated within inventory reports for all cultivation staff members, and validated by the Inventory Manager against current data in the electronic inventory control system. If a discrepancy is discovered during the daily inventory audits, the Director of Security will immediately process an incident report and a subsequent investigation will immediately follow. The Department and local and state law enforcement agencies will also be alerted of the incident in compliance with state law and regulation.

Part IV: Disposal and Waste Removal

Standards for disposal/destruction of MM Waste and other Waste - Upon the conclusion of cultivation activities, all waste will be made unusable prior to the waste leaving our registered facility. MM waste will be rendered unusable through grinding and incorporating the MM waste with non-consumable, solid wastes listed below such that the resulting mixture is at least fifty percent non-MM waste:

- Paper waste,
- Plastic waste,
- Cardboard waste,
- Food waste,
- Soil,
- Grease or other compostable oil waste, and
- Other wastes approved by the Department.

After the MM waste is made unusable, then the solid waste will be:

- Disposed of as a solid waste at a solid waste site and disposal facility that has a Certificate of Designation from the local governing body,
- Deposited at a compost facility, or
- Composted on-site at a facility owned by the generator and operated in compliance with
applicable County statutes and regulations.

- Liquid waste from our MM facilities will be disposed of in compliance with the applicable County statutes and regulations including the International Plumbing Code.

Entity A will enter in to the POS the date of the disposal, type and quantity of medicine disposed of, plant numbers, the reason for disposal, the manner of disposal, the persons present during the disposal, and these persons’ signatures. All adulterated MM that is intended to be removed or transported from the facility shall be staged in an area known as the "quarantine" location and subsequently treated as MM waste.

In compliance with 3796:2-1-02(B)(4)(e) and 3796:2-1-03(B)(3)(e), Entity A has designed standards for the disposal of MM waste and other wastes as well as SOPs for the destruction of MM and disposal of the adulterated MM waste. In compliance with 3796:2-2-0(7), our SOPs clearly define that the disposal of all unused pesticides, fertilizers, and other chemicals will be performed in compliance with all state and federal laws and regulations and in compliance with all directions on the product label. Our Facility is designed to be compliant with 3796:2-2-05(A)(2) as to maintain or construct fencing to prevent unauthorized entry or access to waste disposal containers, disposal areas or compost areas located outside the facility.

The POS will record the reason and associate it with the identifier for that plant or product. The data associated with the destruction is retrievable through pulling a simple report within the system for record keeping or reporting purposes. The report will show the person who created the destruction event, a timestamp of when the event was created, the identifiers for all plants or products to be destroyed, and the reasons the items were selected for destruction.

Additionally, the system can adjust inventory and always requires a reason for removal when utilizing the inventory adjustment feature. Product in need of quarantine can be separated from bulk and placed in the designated area. Inventory destruction can be initiated through the system requiring documentation of destruction purpose and/or approved method as well as the employee performing the action. Although the inventory can be adjusted or voided, at no time is any data ever fully deleted, as the POS system maintains a log of every action, including adjustments and voids, so that the entire history of the system may be reconstructed. The availability and report ability of the system enables the said entity to produce any information necessary for the Department during an inspection or at the Department’s request.

All aspects of the MM plant, byproduct wastes, weights, ID numbers, and associated data is stored in the system indefinitely. Destruction event information and explanations are also documented and stored within the POS system. This data cannot be modified or deleted by employees. Even the POS team cannot access a licensee’s data without their expressed permission.

The POS system records manual inventory adjustments through a detailed notes section, the reason for disposal and, if applicable, the disposal company is recorded and archived to the 16-digit, non-repeating, unique identifier associated with the disposed MM plants, material or products. As with all transactions in the POS system, the employee responsible for the
transaction is required to enter a four-digit pin, or their biometric access recording the date, time, and reason for disposal.

In compliance with 3796:2-2-03(A-E), Entity A has developed SOPs to ensure we dispose of undesired, excess, unauthorized, obsolete, adulterated, misbranded or deteriorated MM waste under the supervision of a type 1 key employee, as defined in paragraph 3796:5-2-01(H)(1) of the Administrative Code, and in such a manner as to render the MM waste unusable or by surrendering without compensation the MM to the director or the director's designee at the director's discretion.

In compliance with 3796:2-2-03(D), Entity A’s type 1 key employee overseeing the disposal of MM will maintain and make available a separate record of every disposal indicating the following: (1) The date and time of disposal; (2) Manner of disposal; (3) Volume and weight of the approved solid waste media used to render the MM unusable; (4) All unique identification codes associated with the MM scheduled for destruction; (5) Reasoning for and description of the disposal; (6) Signature of the type 1 key employee overseeing the disposal of the MM; and (7) if the MM waste for disposal contains plant material that was prepared for sale to a dispensary or processor, the batch number, strain, volume, and weight of the plant material being disposed of. Additionally, Entity A will ensure that the disposal of other waste including hazardous waste and liquid waste will be performed in a manner consistent with federal and state law. Entity A will work with Ohio Environmental Protection Agency to embrace our mutual goal to protect the environment and public health by ensuring compliance with environmental laws and demonstrating leadership in environmental stewardship.

Other potential pollutants including water, air and general production trash will be disposed of or treated in compliance with local, state and federal regulations. Respect for the environment which provides us the opportunity to cultivate medicine for the patients in Ohio is a primary driving force in our long-term strategy for the facility. The details of our waste management are included in our Environmental Plan.

Part V: Adverse Events & Recall

In compliance with 3796:2-1-02(B)(4)(f) and 3796:2-1-03(B)(3)(f), Entity A has SOPs which establish a safe, consistent supply of MM and include recall policies and procedures in the event of contamination, expiration or other circumstances that render the MM unsafe or unfit for consumption, including identification of the products involved, notification to the dispensary or others to whom the product was sold or otherwise distributed, and how the products will be disposed of if returned to or retrieved by our facility.

Our inventory control system is designed to promptly identify a discrepancy and report to the Department. If any staff member discerns a discrepancy between the inventory of stock and inventory control system data outside of normal weight loss due to moisture loss and handling, the staff in coordination with manager and Director of Security, will begin an audit of the discrepancy. Immediately following discovery of a discrepancy, our dispensing organization will:

- Complete an audit;
- Amend any standard operating procedures, if necessary; and
- Send an audit report to the department.

Entity A will conduct and document an audit of our daily inventory according to GAAP once every 30 calendar days. In addition, we will prepare quarterly audit statements to the Department which will include, but not be limited to, an income statement, balance sheet and weekly cannabis inventory, including cannabis acquisition, wholesale cost and sales, prepared in accordance with GAAP. Annually, we will submit an audit including the same information, compiled and certified by an auditor or CPA.

When identified and released, Entity A will incorporate any overseeing department recall procedures into our own internal procedures. The goal of our recall procedure is to:

1. Stop the distribution and sale of affected product.
2. Effectively notify Entity A management, customers and regulatory authorities of recall if necessary.
3. Efficiently hold and remove the affected product from the marketplace.
4. Dispose of the affected product if necessary.
5. Conduct a root cause analysis and report the effectiveness and outcome of the recall.
6. Implement a corrective action plan to prevent another recall.
7. Upon completion of the recall, Entity A management will conduct a post-recall meeting to evaluate the recall.

Notification of Potential Hazard: The initial notification of a potential hazard can come from a variety of sources including the State Health Department, Entity A Employees, contractors or suppliers. Regardless of the source, all health hazard inquiries should be routed immediately to the appropriate manager.

An immediate Hold to Be Placed on All Affected or Suspected Products

As soon as notification of hazard is received, Entity A is responsible for placing an immediate hold on suspected products. Entity A will clearly label all products still in the company’s possession as “Quarantined” and place them in an area of the storage facility separate from all other products in a manner where they would not be mistakenly distributed. Entity A will tabulate product on quarantine and evaluate relative to the total amount of potentially contaminated distributed product. Entity A will strive to recover as much product as possible. The Management Team will assist any governmental investigative agencies in obtaining samples for microbial or chemical testing.

Fact and Data Acquisition: In the initial conversation with the Department or customer, the manager will ascertain the available facts associated with the potential health hazard, using the Customer Complaint Log to organize the pertinent facts and create an official record of the issue. Regardless of where the issue originates, the manager will keep careful, detailed notes of the initial conversation and all subsequent activities associated with the recall process. The manager will include in these notifications time and date of each event to aid in the preparation of a final report and measure the effectiveness and timelines of the response. These facts and related information in the final report will need to include: (1) Product type and label (with picture); (2) Description of the product and its intended use; (3) Product codes and expected shelf life; (4) Type of packaging; (5) Nature of defect or health hazard; (6) Locations involved; (7) Invoice(s); (8) Customer(s); and (9) Number of people affected and their condition.
The manager will also obtain the name, agency/customer, and phone numbers of the person making the notification. The manager will also inquire as to whether other products are being investigated as a source of the health hazard and if other companies have been contacted. Often in the initial stages of an epidemiological study more than one potential source is under consideration. In some cases, cross contamination in the food preparation or contamination by ill food handlers will need to be carefully considered.

**During the Health Hazard Investigation:** When a situation occurs that links Entity A to an incident, an immediate trace back and Health Hazard Investigation will be initiated. A Health Hazard Evaluation must consider the following: Whether any disease or injuries have occurred from the use of the product; assessment of the degree of seriousness of the health hazard; assessment of the likelihood of occurrence of the hazard and; assessment of the consequences – immediate and long range.

The first possible scenario following a trace back is that it is determined that the nature of the potential hazard does not pose a public health risk. The second possible scenario is that epidemiologists cannot unequivocally determine the sources of the contamination. The third possible scenario is that Entity A product may not be linked to the contamination because the time interval between the actual event and notification of Entity A precludes a recall since the perishable nature of the product means that the product has already been consumed. When a recall is not appropriate, the focus of our efforts will be toward assisting investigating government agencies and/or customers in isolating the likely source of the contamination. The manager will continue to work with growers, suppliers, customers, vendors, and government agencies to establish the likely cause of the problem and develop preventative measures. This will culminate in a final report that will be reviewed with the Management Team. This report will outline any changes that need to be made.

**The Recall Decision**
The recall decision is based on a risk-benefit analysis that weighs the adverse health effects and economic impact against the cost of conducting the recall. Primarily, emphasis is placed on adverse health effects. As soon as sufficient information is available, the appropriate decision-maker (CEO), after consulting the manager, legal counsel, and other relevant departments will make the following decisions:

- Whether to keep the product on hold, initiate a recall, and/or conduct further recall investigations.
- If a recall is initiated, decide on what type, develop the recall strategy, and issue operating instructions to the company staff via the manager.
- When any government agency is to be notified of the situation. And what information the company should disclose and what recommendations the company should make.

Note: A recall decision does not depend solely on the health risk of the product. Defective products and misbranded products where no health hazard exists are still in violation of the law and should be recalled.

**Elements of the Recall Strategy** include method of notification, depth of retrieval, whether effectiveness checks are required, and if so, to what level and whether media releases are
required and, if so, what medium or media would be most appropriate and what the release
should contain.

Recall Status Reports
Periodic status reports to the appropriate government office during the recall will become
necessary in the event of a recall. Status Reports should include the following: Number of
customers notified of the recall; Date and method of recall; Number of customers responding to
the communication and amount of product they had on hand; Number of customers who did not
respond; Number of products returned or corrected by each customer and the quantity of the
product accounted for (as recorded on the Customer Complaint Log) and; An estimate of the
time for completion of the recall.

Recall Procedure
In the event of a situation that warrants a recall, the following steps should be taken:
Step 1: Classify the recall: there are three different classes (See section titled Recall
Classification)
Step 2: Alert Entity A employees to their responsibilities

Individual Responsibilities
CEO: Makes decision to withdraw or recall product and to involve regulatory bodies. Directs
manager with customer and storage facility communication. Coordinates with all Media
Communication. Obtains Legal Counsel.
Cultivation Manager: Classifies recall, involves all necessary Entity A employees, notifies the
Product Manager, coordinates retrieval of all process, storage and shipping data involving
suspect product.
Inventory Manager:
1. Utilizing the code date of the suspected product(s) and appropriate production forms,
obtains all the pertinent production data necessary as quickly and as accurately as
possible.
   • The time period, day(s) during which the suspected product(s) was processed
     and/or packed.
   • The affected lot(s), location(s), cultivation room, and table harvested from (if
     possible)
   • The total volume of finished product manufactured.
   • Process data, production shift, transfer shipment information.
   • The different types of packaging and packaging sizes and identification markings
     utilized and their individual finished product volumes.
   • All pertinent product codes/ and affected labels as well as pictures taken of the
     labels.
2. Provides the information gathered under item 1 to the Trace back/Product as it is
   retrieved.
3. Utilizing the code date and the appropriate shipping forms, determines the following
   information as quickly and as accurately as possible:
   a. The current location(s) and total volume of all suspected product(s) within Entity
      A storage/distribution/dispensary facilities.
b. The total volume of suspected product(s) shipped to each dispensary based on transfer documents.

c. All suspected product(s) within Entity A distribution facilities gathered together, isolated and then tagged, “Hold – DO NOT SHIP.” Any suspected “in process” cannabis or edible products will also be placed on hold. Provides the information gathered under item 1 to the Trace back/Product as it is retrieved.

Recall Strategy

1. Indicate the level in the distribution chain to which you are extending your recall (in this case—medical user)
2. Indicate the method of notification (telephone is default). It is advisable to include a written notification so customers will have a record of the recall and instructions
3. Consider posting the recall notification on the Entity A website as an additional method of recall notification
4. Report on what Entity A has instructed customers to do with the recalled product and its whereabouts
5. It is helpful for recalling firms to know the name and title of the Recall Contact for each of its customers. Addressing a recall notification letter to a recall contact will expedite the recall process and reduce the potential for the notification letter to get misdirected.

Public Notification

The most important part of the recall communication is to convey the identity of the product in question and recall status, that further distribution of the product should cease immediately, and instructions regarding what to do with the product. If an infectious agent is identified but not classified by the complaint, analytical testing will be conducted for the purpose of health hazard investigations. The lab will perform Pesticide Screening, Mycotoxin Screening, Testing for Mold and Bacteria and Residual Chemical Testing.

In compliance with 3796:2-2-03, our waste disposal plans are described in Section IV of this Section 2C. In compliance with 3796.01(A)(1)(a-d), Entity A will identify the MM as “Adulterated MM” if a substance has been mixed or packed with the MM so as to reduce the quality or strength or the substance; has been substituted wholly or in part for the marijuana, or it consists, in whole or in part, of any filthy, putrid, or decomposed substance, including mold, mildew, and other contaminants; or it has been produced, processed, prepared, packed, or held under unsanitary conditions whereby it may have been contaminated with filth, or whereby it may have been rendered injurious to health; or its container is composed, in whole or in part, of any poisonous or deleterious substance that may render the contents injurious to health. Any adulterated MM will be disposed of in compliance with 3796:2-2-03 (A-E) including ensuring the activity will be under the supervision of a type 1 key employee who will render MM waste unusable. The MM waste that is rendered unusable will be discarded into a locked and designated destruction area. Entity A will maintain and make available in accordance with this chapter a separate record of the activities and all waste as deemed by Department.

Entity A will comply with any future regulations provided by Ohio Department of Agriculture, acting with the cooperation of the Department, that establish a quarantine to prevent the dissemination of plant pests or other contaminants within this State. If no such order is provided by any department, Entity A will upon finding any risk in our facility that has the potential to
cause severe damage to other growers or to agriculture in general, will enact a quarantine order. The quarantine order will establish conditions and restrictions determined to be necessary to prevent or reduce the movement of the contaminant from the quarantined area. Vehicles or any means of conveyance suspected of carrying contaminant may also be subject to quarantine and a treatment order may be issued as necessary to eradicate the plant pest. The quarantine order may regulate the planting, growing or harvesting of any immature MM plants or MM plants that serve as a host or reservoir for the plant pest within the quarantined area and may include prohibiting the processing of a specific batch of MM within a specific geographic area or during a specified time. An immature MM plant or MM plant suspected of harboring a contaminant may be ordered to be treated or destroyed. In compliance with 3796:2-2-04(C)(2)(b), Entity A will record the batch number, weight, and strain name associated with each batch that has been quarantined for testing or ready for sale to a processor or dispensary.

Our inventory tracking protocols also focus on damaged, defective, expired or contaminated MM returned from a licensed dispensary, processor or laboratory that is awaiting disposal. Entity A will follow a strict protocol to ensure all contents in inventory will be accounted for in its electronic system. Entity A has a detailed procedure for inspection of all MM that arrives as returns. Entity A will undertake rigorous inspection of all products that come to its facility. As part of the SOPs for receiving returned MM shipments, Entity A will implement protocols to assure the quantity of MM in a shipment. All employees will be trained on the protocol prior to employment at the facility and throughout their time working at the facility.

All returned MM shipments received by the organization will be segregated within the receiving area for inspection by cultivation staff. The inspection includes a review to ensure that each item is damaged, defective, expired or contaminated. Employees assigned to conduct inspections of received packages of MM will be trained to identify problems with received packages and the appropriate protocols for segregating, annotating, and documenting damaged, inaccurate, or incomplete items. Employees will work in teams of two to review each returned item. One staff member will be responsible for visual inspection of the contents, labeling, and condition of each package. The second employee is charged with weighing contents and entering inspection data into the electronic inventory control and tracking system for each item. The second employee also serves a secondary source of inspection throughout the process. During an inspection process, any package that is confirmed to be defective, meaning it is damaged, inaccurate, expired, contaminated, or incomplete, is set aside apart from other received items and prepared for disposal.

Notation and records of any received shipment that is defective will be included in the electronic inventory tracking system by Entity A employees. A process for securing defective shipments will be enacted once an entire shipment has been inspected and is moved out of the segregated receiving storage area. The process will include documenting the defect with the package and updating the information from the return in the electronic inventory control system.

All MM that is expired, damaged, deteriorated, mislabeled, contaminated, recalled, or whose packaging has been opened or breached will be segregated within the secure room at Entity A and held until the products are disposed of in compliance with state law and regulation. After the affected products have been accounted for in the inventory control system, they will be placed in
tamper-evident, locked containers and segregated within the secure room in a storage area exclusively for MM to be disposed. The segregation diminishes the potential for the soon-to-be disposed MM coming in contact or contaminating active MM in inventory. Entity A will severely limit the amount of time that products to be disposed remains in the secure room. It will focus on regular, timely disposal of MM in compliance with state regulations and the organization’s disposal process, with a goal of disposing MM within one day.

Along with procedures for handling returned MM from licensed dispensaries and processors, Entity A will also have in place procedures in the event of a product recall. If a complaint is received from a licensed dispensary about a MM from a patient reporting an adverse event, Entity A will commence an immediate investigation of the incident. All investigations will be headed by the Director of Security and the COO. These individuals will be designated as “recall coordinators.” A determination will be made within 24 hours if the complaint warrants a voluntary recall of MM, a mandatory recall of MM, or other further action. If no further action is required, Entity A will inform the Department of the decision within 24 hours and submit a detailed written report to the Department stating the rationale for all actions.

Voluntary recall actions will be made if the MM in question does not pose a risk to public health and safety. If a voluntary recall is made, Entity A will notify the Department at the time the recall activity begins. Mandatory recall actions will be made if a condition related to the MM in question poses a risk to public health and safety. If a mandatory recall is made, Entity A will immediately inform the Department by phone and commence a full mandatory recall protocol. Entity A will secure, isolate and prevent the distribution of the MM that may have been affected by the condition and remains in its possession.

During a recall, all MM production activities at Entity A will be halted until all management team members are apprised of the situation. As part of the action plan, recall activities will commence from the affected batch or lot of affected product, as identified by the label information and verified by our electronic inventory control system. Inventory staff will determine if any affected product within the batch or lot is contained in the facility. If so, that MM product will be immediately quarantined and moved to a secure area for disposal. For affected product that has already been transported to other licensed dispensaries, determinations will be made as to the location of affected product through the inventory control system and electronic transport manifests. The COO will initiate immediate contact with all receiving parties to inform them of the situation and call for the immediate removal of recalled product. As part of the communication plan, notice of the recall will be posted publicly on our website, shared with the Department for further distribution, including in a press release to local medical outlets, and shared with all receiving dispensaries to further inform patients and caregivers. Entity A will work with all affected parties (licensed dispensaries, laboratories, patients, caregivers) to begin acceptance of any recalled product to its facility for proper disposal. Disposal activities will be coordinated with the Department, and authorized agents of the Department may oversee the disposal to ensure that the recalled MM is properly handled in a manner that does not pose risk to public health and safety.
As with any product returned to the facility for disposal, protocols listed above for inventory management through the electronic system will be administered. Information relevant to the recall will be input into the electronic inventory control system, including the following: Total amount of recalled MM, including types, forms, batches and lots, if applicable; The amount of recalled MM received by Entity A, including types, forms, batches, and lots, if applicable, by date and time; Names of recall coordinators; Source of recalled MM received; Means of transport of recalled MM; Reason for recall; Number of recalled samples, types, forms, batches and lots, if applicable, sent to laboratories, the names and addresses of the laboratories, the dates of testing and the results by sample; Manner of disposal or recalled MM including name of individual overseeing disposal, name of disposal company (if applicable), method of disposal, date of disposal, amount disposed by type, forms batches and lots (if applicable) and; Any other information required by the Department.

Entity A will utilize our POS system to monitor and track all adverse events and recalls. Any and all adjustments to inventory levels must be administered by the appropriate staff. In the event of a recall, specified users can quickly pull reports of all products and transactions associated with a specific plant(s), batch or strain. Within the system the licensed entity will be able to quickly and easily find the remaining product, the locations delivered to as well as all sources and derivatives of the product. Once the affected individuals have been identified, because the supply chain contact preferences have already been logged, timely communication is accessible. The POS system also provides a method of sending SMS(text) message or email blast messages, which can be targeted to just those distribution points that have purchased a specific product within a given time period. Upon destruction of the product, any and all information pertaining to its destruction, including but not limited to method of destruction, witness documentation and an electronic PIN or biometric fingerprint scan signature from the person in charge. This will be considered the alternative end to the product life cycle, and true seed-to-sale traceability and reconciliation can be visibly achieved.

Part VI: Recordkeeping & Regulatory Compliance

Record Keeping SOPs

**SOP Records** - Entity A has developed a catalogue of documents that are specific to the management and operation of the organization. These protocols are confidential in nature, given the intellectual property contained within them. As a compliant and efficient organization, Entity A is dedicated to storing, updating and maintaining these materials, which include: business plans, operating manuals, staffing plans, departmental operating procedures, employee handbooks/manuals, management plans, and human resources plans. All documentation will be kept in physical form within the Entity A facilities and kept in a secure location on each premise. The CEO will maintain electronic copies of all management protocols and standard operating procedures with redundant backup maintained on the organization's secure file server. Access to these records will be limited to only those with authorized clearance for review. Entity A will provide copies of all management protocols and operating procedures for review by state regulators upon request.

**Employee Records** - Entity A will maintain employee records to include records relating to the hiring of employees, including applications, documentation of verification of references, and any other related materials; an employee log that includes the following information for every current
and former employee: (a) Employee name, address, phone number and emergency contact information; (b) Registration number and access credential designation; (c) Date of hire and date of separation from employment, if applicable, and the reason for the separation; (d) All training, education, and disciplinary records; and (e) Salary and wages paid to each employee, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with any MM entity, including members of a non-profit corporation, if any. Personnel records will be maintained for a period of five years after the employee is no longer employed at Entity A. Documentation of all dates and times that the staff member was on site will also be maintained in hard copy as well as on the company’s file server. Physical copies will remain on site in fire resistant storage containers. Analysis of personnel documentation by state regulators and law enforcement agencies will be permitted in accordance with state and federal employment law. Records will also be kept on all processes related to the cultivation of MM. The SOPs for cultivation calls for monitoring systems for MM plants, with data from the monitors to be continually reported in the electronic inventory control system and in hard-copy format.

Visitor Records - The organization will also document the records of all visitors to the facility. Records for all transportation and visitors will be documented by the organization and retained for inspection and review by state regulators. The records will be preserved in hard copy on site for a period of five years, and stored in a fire-resistant container. The reports will also be scanned and saved electronically on the organization’s files server with regular back-up.

Facility Environment Records - Temperature, humidity, ventilation, water treatments, light cycles, and carbon dioxide levels will be monitored by using iPonic 614 Hydroponic Controller. The iPonic 614 Hydroponic Controller will integrate data into the POS system, allowing for monitoring, recording, and regulating a litany of readings throughout a plant’s life cycle. The system will also record nutrients added during the cultivation process as well as any pesticide, fungicide, or insecticide (from the list of acceptable active ingredients in state regulation) applications applied to plants. These records will be maintained as part of the organization’s recordkeeping protocol, and stored for a period of five years in hard copy and electronic format. The hard copy records will be maintained on-site and held in fire-resistant containers.

Equipment Records - Entity A will maintain clear records of maintenance of equipment that comes in contact with MM in the facility. As part of the regular maintenance of operation of this equipment, Entity A will routinely calibrate, check and inspect all automatic, mechanical or electronic equipment in its facility used for cultivation of MM. Scales, balances, and other measurement devices used in the cultivation functions of the operations will be included in the maintenance program. Detailed records of maintenance of equipment, cleaning of equipment, and calibration will be recorded each day by Entity A staff and included in the electronic inventory control system. These records will be maintained as part of the organization’s recordkeeping protocol, and stored for a period of five years in hard copy and electronic format. The hard copy records will be maintained on-site and held in fire-resistant containers.

Additive Application Records - In compliance with 3796:2-2-01(C)(6)(a-l), Entity A will maintain records of all pesticide, fertilizer, or other chemical applications for at least five years and it will be made available to the department upon request. Each of these application records will include: (1) The date and time of application; (2) Stage of cultivation process; (3) Date when
the plants in the application area were moved to the flowering stage; (4) United States Environmental Protection Agency registration number; (5) Analysis of the fertilizer applied; (6) Application site; (7) Name and amount of the product being applied; (8) Unique plant identifier or other information that identifies which plants received the application; (9) Size of the application area; (10) Name of individual making the application; and (11) Comments or special conditions related to the application.

**Pesticide and Fertilizer Records** - Entity A will provide comprehensive cultivation records, which will include forms and types of MM maintained at the facility daily; soil amendment, fertilizers, pesticides, or other chemicals applied to the growing medium or plants, and production records, including planting, harvesting and curing, weighing, packaging and labeling.

**Pesticide Application Records** - Pesticide application records will be completed within 24 hours of the completion of application at Entity A. All records will be made available upon request to the Department or its authorized agents and medical personnel or first responders in an emergency. Records will also be made available to the Ohio Department of Agriculture upon request. Records related to the cultivation of MM are essential to the standardization of production processes.

**Laboratory Result Records** - The POS will additionally record the description of the MM; product type (strain); name, address, percentage of THC and CBD per independent lab testing results; number of doses per package; the form and quantity of MM; expiration date; packaging date; proper storage information if applicable; and price. Entity A will maintain records of all samples sent to independent testing laboratory and the quality assurance test results.

**Production and Disposal Records** - Production and disposal records are maintained within the POS system including: (1) The registered product name, strain and quantity of MM involved; (2) The date of production or removal from production; (3) The reason for removal from production, if applicable; (4) A record of all MM sold, transported, or otherwise disposed of; (5) The date and time sale, transportation, or disposal of the MM; and (6) If the MM is destroyed, the cultivator shall maintain records in accordance with 3796:2-2-03(D).

**Adverse Loss/Events Records** - Entity A will maintain records of any theft, loss, or other unaccountability including all reportable incidents at the facility, and make such records available to state regulators and law enforcement agencies per state regulation. Reportable incidents include any instance of diversion, loss, or theft of MM, as well as any disciplinary action taken by the organization. The incident reports, to be recorded within ten days of the incident, will include the following: (1) Entity A name and contact information; (2) Description of the incident including its cause and identification of injuries if applicable; (3) Names of employees and id numbers or other persons involved in the incident if applicable; (4) The date/time of the incident, the total quantity and type of MM stolen/diverted following an inventory audit; (5) The action taken in direct response to the incident; (6) Identity of any law enforcement or emergency personnel contacted or allowed to enter the premises as a result of the incident; and (7) the signature of the person reporting the incident.
Entity A will submit to the Department a revised plan to secure the facility's inventory and measures that will be taken to prevent future loss, theft, or diversion. Additionally, Entity A will identify all the records at the facility and potential evidence outside the facility, including video surveillance footage, which will be prevented from being destroyed until a full investigation is conducted by the Department and law enforcement, if deemed necessary. All reportable incident records will be retained in hard copies on site for a period of five years and contained in fire-resistant containers. The reports will be scanned and preserved electronically on the organization’s file server as well with regular back-up.

**Diversion Record** - In compliance with 3796:2-3-01(F-G), Entity A considers diversion prevention a primary focus of our day-to-day operations. If an inspector finds evidence of operational failures or conditions that create a likelihood of diversion, contamination, risk to public health, or the occurrence of any prohibited activity under 3796:5-6-02, Entity A will comply with all immediate action deemed necessary by the Department. To prevent destruction of evidence, diversion, or other threats to public safety, Entity A will comply with any department order for an administrative hold of MM or any books and records of any cultivator. Entity A will assume the costs if the Department makes such an assessment.

**Transportation Records** - The offsite transportation and visitor records will include: names and addresses of the MM entities sending and receiving the shipment; names and registration numbers of the registered employees transporting the MM; license plate number and vehicle type that will transport the shipment; time of departure and estimated time of arrival; specific delivery route, which includes street names and distances; and total weight of the shipment and a description of each individual package that is part of the shipment, as well as the total number of individual packages. As part of our business strategy, transportation will be limited to delivery of MM to licensed dispensaries, processors, or delivery of small samples of MM to an independent laboratory for testing and analysis.

**MM Audit Records** - Audit reports on all inventories can be run at any time by the organization’s management team. The inventory audits will be reconciled with daily counts of all MM contained in the facility, regular monthly product inventory analysis, and a comprehensive annual audit of all inventory stored within the cultivation facility. All inventory audits will be documented and maintained for a period of five years by the organization. Inventory reports will be maintained electronically on the organization’s internal file servers, with hard copies retained in fire-resistant storage containers on site. Inventory reports and records will be made available to state regulators upon request.

**Annual Inventory Record** - Entity A will comply and adhere to the mandates of state regulation within the action of providing documentation to the department in compliance with 3796:2-2-04(D), where Entity A will on an annual basis and as a condition for renewal of a cultivator license, provide that a type 1 key employee will conduct a physical, manual inventory of MM on hand at the cultivator and compare the findings to an annual inventory report generated using the inventory tracking system. 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 3796:5-4-01.
Financial Records - Entity A will maintain financial records that clearly reflect all financial transactions and the financial condition of the business, including contracts for services performed or received that relate to the cultivation; purchase invoices, bills of lading, manifests, sales records, copies of bills of sale, and any supporting documents, including the items and/or services purchased, from whom the items were purchased, and the date of purchase; bank statements and canceled checks for all accounts; and accounting and tax records related to the cultivator and all investors in the facility.

Entity A has developed a catalogue of documents that are specific to the management and operation of the organization. These protocols are confidential in nature, given the intellectual property contained within. As a compliant and efficient organization, Entity A is dedicated to storing, updating and maintaining these materials, which include: business plans, operating manuals, staffing plans, departmental operating procedures, employee handbooks/manuals, management plans, and human resources plans. All documentation will be kept in physical form within the Entity A facilities and kept in a secure location. The CEO will maintain electronic copies of all management protocols and standard operating procedures with redundant backup maintained on the organization's secure file server. Access to these records will be limited to only those with authorized clearance for review. Entity A will provide copies of all management protocols and operating procedures for review by state regulators upon request.

Accounting Records - Entity A will contract with a certified public accountant licensed in Ohio to verify the accuracy of all financial reports. The organization will also employ an internal accounting department with professionals that will maintain the daily books and records of the organization. All financial documentation will be maintained electronically on the local accounting system, which is integrated with the POS systems of the cultivation operations. All financial records will be encrypted and secure, redundantly backed-up to the internal file servers with additional backup to a secondary redundant storage system. Physical copies of all financial records will remain on-site for a period of five years and stored in fire-resistant storage containers on premise. All records will be available for inspection and review by state regulators and law enforcement upon request.

Security Records - Entity A will document and retain records pertaining to security records at the facility. The Director of Security and the COO will oversee security record keeping. Security records will include physical documentation of visitor logs to the facility and reports on any reportable incidences (disruptions, diversion, theft, code of conduct violation, emergencies, etc.). All security records will be maintained in physical form and maintained at the organization in fire-resistant containers for a period of five years. Additionally, reports will be scanned and preserved electronically on the organization’s file server. All security documentation will be made available to state regulators and law enforcement agencies upon request.

All surveillance video recordings and images will be retained for a 30-day period and stored on file servers in a secure room within the facility. At the conclusion of the 30-day period, all recordings will be archived in an electronic format and securely stored at an offsite records storage facility. The archived recording will be stored in waterproof and fireproof storage containers at the storage facility. Entity A will promptly respond to any request for video surveillance recordings from the Department or law enforcement for just cause as requested.
Requested content will be provided electronically (thumb drive, disk) and sent via email or standard mail per the preference of the requesting agency. The Director of Security will confirm each request, document the request in the organization’s records, and provide the requested content immediately. In compliance with 3796:2-2-05(D), Entity A will keep all security equipment in good-working order and the systems shall be inspected and all devices tested on an annual basis by a third party. Record of this maintenance will be available to the department at any time.

**Inspection Records** - In compliance with 3796:2-3-01(A), Entity A recognizes the departments irrevocable right to conduct all inspections necessary to ensure compliance with our application. The Department may conduct the inspection independently, or may work with other departments, state agencies, or local authorities, including the Ohio Department of Agriculture, the division of industrial compliance, and the division of state fire marshal, to ensure compliance with our application, state and local law, Chapter 3796. of the Revised Code.

In compliance with 3796:2-3-01(B), Entity A type 1 key employees will accompany the Department inspector while the inspector completes the following: (1) Review and copy of all records; (2) Enters any area in the facility (with respect to avoid compromised production integrity or interrupt a dark cycle during the flowering stage); (3) Inspects facility vehicles; (4) Reviews the policies and procedures, including methods of operating; (5) Surveys the premises and any off-site facilities; (6) Inspects all equipment, instruments, tools, materials, machinery, or any other resource used to cultivate MM; (7) Provides access to locked areas in the facility; (8) Questions registered employees at the location; or (9) Obtains samples for testing of any MM cultivated at the facility, media used to grow MM, chemicals and ingredients used in the cultivation process, any labels or containers for MM, or any raw packaged MM.

In compliance with 3796:2-3-01(D-E), the Department may at any time, with or without notice, conduct an inspection of facility to ensure compliance with the facility’s application, state law, Chapter 3796. of the Revised Code, and the rules promulgated in accordance with Chapter 3796. of the Revised Code. This inspection may include, investigation of standards for safety from fire on behalf of the Department by the local fire protection agency. If a local fire protection agency is not available, the division of state fire marshal may conduct the inspection after Entity A pays the appropriate fee to the division of state fire marshal for such inspection. Following the inspection, the Department shall issue an inspection report that documents the following: (1) The observations and findings of the inspections; (2) The outcome of the inspection, any suggestions for the cultivator to take into consideration; and (3) a written statement listing any deficiencies identified during the inspection.

**Deficiency Records** - In compliance with 3796:2-3-01(C), Entity A recognizes that a pre-approval inspection is required before the department issues a certificate of operation. Upon the completion of the pre-approval inspection, the department may issue either of the following: a certificate of operation in accordance or a written statement listing the deficiencies identified during the inspection that must be remedied before a certificate of operation will be issued. If deficiencies are issued, Entity A will develop a plan of correction for each deficiency and submit the plan in writing to the Department for approval within ten business days after receipt of the statement of deficiencies, unless a written extension is issued by the Department. The plan of
correction will include specific requirements for corrective action that will be performed within either thirty calendar days after the Department's acceptance of the plan of correction or the remaining time period under 3796:2-1-06(B), whichever is greater. Entity A understands that if the plan of correction submitted is not acceptable to the Department or would prevent the facility from obtaining a certificate of operation in accordance with 3796:2-1-06, the Department may either direct Entity A to resubmit a plan of correction or the Department may develop a directed plan of correction with which the cultivator must comply. Upon acceptance of the written plan of correction, Entity A will sign the plan of correction which binds us to the terms under which we may be issued a certificate of operation.

Entity A understands that if the parties are unable to come to terms on the written plan of correction, the department may take any action permitted under 3796:5-6-01. Entity A recognizes that the department will re-inspect the facility upon the completion of the written plan of correction at which time the Department can issue a certificate of operation. If the corrective measures do not meet the requirements of the written plan of correction, the department may take action in accordance with 3796:5-6-01.

**Implementation and Compliance with Inventory Tracking System**

Entity A’s electronic inventory system (POS) will record the unbroken chain of custody of all MM seeds, immature and mature MM plants, and MM throughout cultivation and sales. Protections are built into the system to ensure that no amount of MM will be available for transport, recall, or disposal without being appropriately tracked in the electronic records system. Entity A will ensure our POS and the one selected by the Department and will either link the system through an interface or exclusively we will utilize the Department’s selected vendor. Records related to the sale, samples, transportation of MM to licensed dispensaries, processors, and testing laboratory will be compliant with the Department. By implementing our POS, the organization will track exact documentation of all materials and MM in its facilities in real time. All inventory tracking records and inventory records will be maintained in the inventory tracking system, as well as records maintained by the facility outside the inventory tracking system will be in accordance with 3796:2-2-04.
Applicant should provide a narrative detailing support for, at a minimum, the following:

**Part I: Surveillance Technology and Physical Security**

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

(A) Camera feed should traverse the IP network from the camera source to the server utilizing Motion JPEG (MJPEG) or MPEG-4/H.264/Advanced Video Coding codec technology.

(B) Data should be transmitted over the Real-time Protocol (RTP) or Real Time Streaming Protocol (RTSP).

(C) Camera should support pan, tilt, and zoom functionality and controls.

**Part II: Security and Transportation Policies and Procedures**

(A) A security plan in accordance with rule 3796:2-2-05 of the Administrative Code, that establishes policies and procedures to ensure a secure, safe facility to prevent theft, loss, or diversion and protect facility personnel. (3796:2-1-03(B)(4)(a))

(B) Transportation policies and procedures, which includes the transportation of medical marijuana from a cultivator to a processor or dispensary and from a cultivator to a testing laboratory in the state of Ohio, in accordance rule 3796:5-3-01 of the Administrative Code. (3796:2-1-02(B)(5)(c), 3796:2-1-03(B)(4)(e))

**Part III: Facility Plot Plan and Specifications**

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

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

Part IV: Emergency Notification Procedures

Emergency notification procedures with the department, law enforcement, and emergency response professionals. (3796:2-1-03(B)(4)(c))
2E Financial Plan
(Maximum of 10 pages, see instructions for formatting)

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

Applicant should provide a narrative detailing support for the following:

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

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