



FORM 1: APPLICANT GENERAL INFORMATION

Applicant Information				
Applicant Name				
Alamanda Farms LLC				
Mailing Address				
21126 136th Street				
City	Apt/Ste #	State	ZIP Code	Country
Live Oak	N/A	Florida	32060	USA

Contact Information		
First Name	Last Name	Middle Initial
Jason	Webski	M.
Telephone Number	Designated Email (for Department/Applicant Communications)	
(203) 667-7787	jwebski@sweetspotfarms.com	

Medical Director Information		
First Name	Last Name	Middle Initial
David	Abramson	L.
Florida Physician (MD or DO) License Number	Telephone Number	Email
ME156947	(201) 731-3134	plasticsurgerydoc@dkabramson.com

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Section 4.2 – Declaration of Exempt Information

The following is a listing of information within this application that is claimed to be exempt from public disclosure broken down by each section and subsection of the application that has been excluded from the Redacted Copy provided with the application as described in Section 2.4 of the Application Instructions:

- Subsection 4.3.3
 - The information redacted in this Subsection is comprised of trade secrets and confidential personal information that is exempt from public inspection or disclosure pursuant to Fla. Stat. § 119.071(5).
- Section 4.7
 - The information redacted in this Section is comprised of trade secrets and security plans that are exempt from public inspection or disclosure pursuant to Fla. Stat. § 119.071(3).
- Section 4.12
 - The information redacted in this Section is comprised of trade secrets and confidential personal information that is exempt from public inspection or disclosure pursuant to Fla. Stat. § 119.071(5).
- Section 4.13
 - The information redacted in this Section is comprised of trade secrets and confidential personal information that is exempt from public inspection or disclosure pursuant to Fla. Stat. § 119.071(5).

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Section 4.3

Certificate of Registration, DACS Documentation, and Background Screening

Subsection 4.3.1 – Florida Business Registration

The Applicant is an entity and has been registered to do business in Florida since 2006.

Please find a Certificate of Status from the Florida Department of State on the following page.

State of Florida

Department of State

I certify from the records of this office that ALAMANDA FARMS, LLC. is a limited liability company organized under the laws of the State of Florida, filed on December 21, 2006, effective December 21, 2006.

The document number of this limited liability company is L06000121455.

I further certify that said limited liability company has paid all fees due this office through December 31, 2023, that its most recent annual report was filed on March 2, 2023, and that its status is active.

*Given under my hand and the
Great Seal of the State of Florida
at Tallahassee, the Capital, this
the Twenty-third day of March,
2023*




Secretary of State

Tracking Number: 8145415289CU

To authenticate this certificate, visit the following site, enter this number, and then follow the instructions displayed.

<https://services.sunbiz.org/Filings/CertificateOfStatus/CertificateAuthentication>

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Subsection 4.3.2 – DACS Documentation

On the following page, please find a valid Certificate of Nursery Registration issued to the Applicant by the Florida Department of Agriculture & Consumer Services pursuant to section 581.131, F.S.



Florida Department of Agriculture and Consumer Services

B112159

CERTIFICATE OF NURSERY REGISTRATION

Section 581.131, F.S. and Rule 5B-2.002, F.A.C
1911 S.W. 34th St. P.O. Box 147100, Gainesville, FL 32614-7100 (352) 395-4700

NICOLE "NIKKI" FRIED
COMMISSIONER

ISSUED TO:

ALAMANDA FARMS, LLC
JENNINGS, JASON
21126 136TH ST
LIVE OAK, FL 32060-5654

THIS CERTIFICATE EXPIRES: 08/27/2023

FEE PAID: \$35.00

REGISTRATION NO.: 48027580

DATE ISSUED: 07/15/2022

THIS IS TO CERTIFY that the nursery stock on the premises of the nursery shown hereon has been inspected for plant pests and meets at least the minimum requirements of Section 581.131, Florida Statutes.

THIS CERTIFICATE OF REGISTRATION MUST BE DISPLAYED or in the immediate possession of any person engaged in the sale or distribution of nursery stock.

FDACS-08002 Revised 05/05

NICOLE "NIKKI" FRIED
Commissioner of Agriculture

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Subsection 4.3.3 – Level 2 Background Screening

All of the applicant's owners and managers have submitted the required Livescan to the Florida Dept. of Law Enforcement under the ORI number FL924890Z (DOH – OFFICE OF MEDICAL MARIJUANA USE).

All Owners and Managers used the Livescan service provider *Field Print*. Applicant identified this Livescan Service Provider through the Department of Health's website list of out-of-state-providers, found at the following link:

<https://flhealthsource.gov/background-screening/out-of-state-providers/>

Each Owner and Manager requested a TCN number after undergoing the fingerprint test in the Field Print facility, yet each were told that the provider does **not** give out TCN numbers. Applicant has sent an email to the Office of Medical Marijuana Use documenting this. Applicant will supplement this application by communication to OMMU with the TCN numbers as soon as they are received.

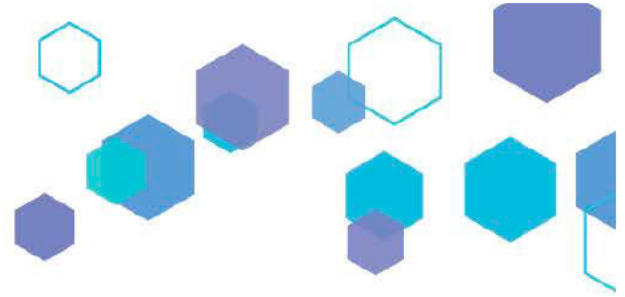
A complete list of the applicant's owners and managers begins on the following page.

Name	Owner Manager	Email	Physical Mailing Address	TCN Number	Date of Livescan
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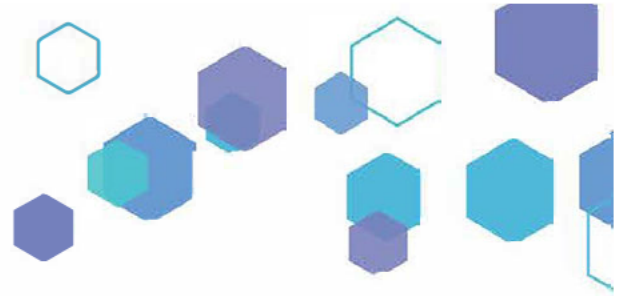
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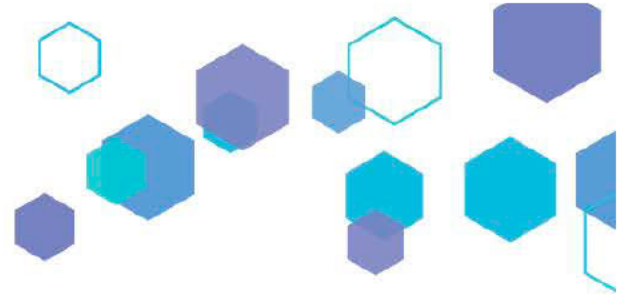
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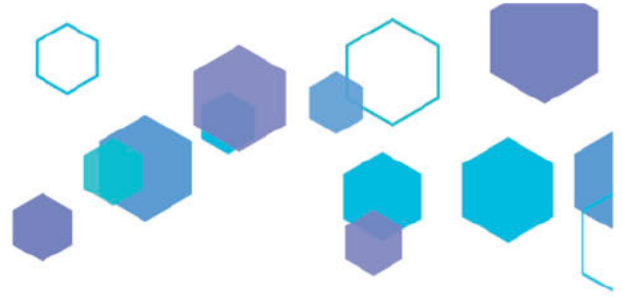
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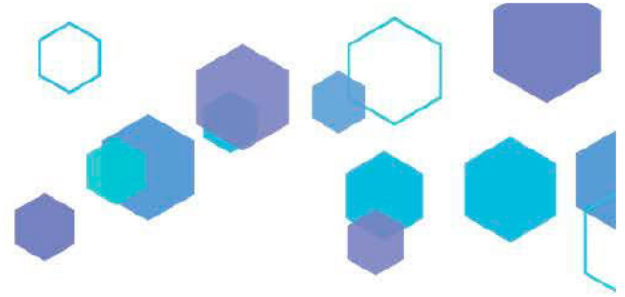
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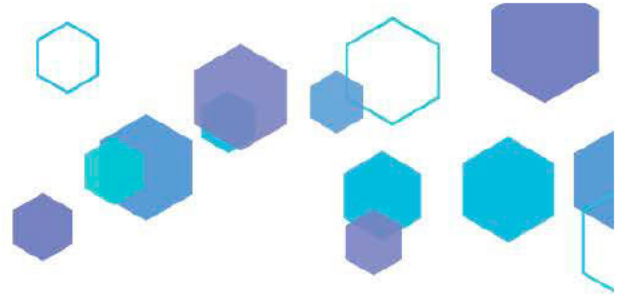
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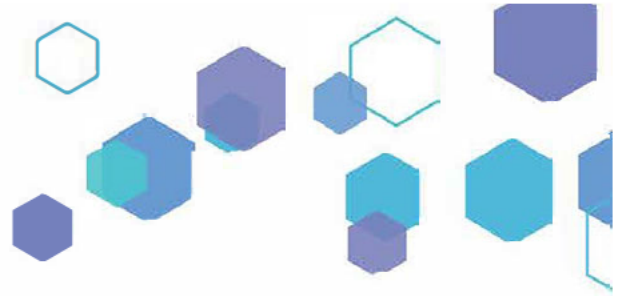
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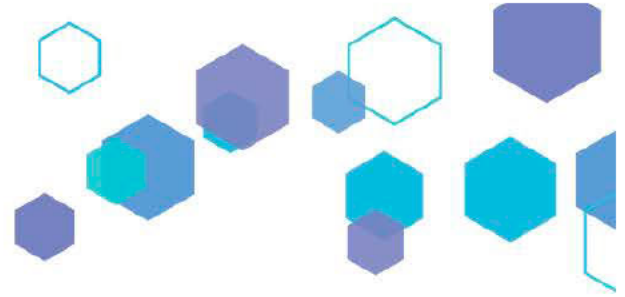
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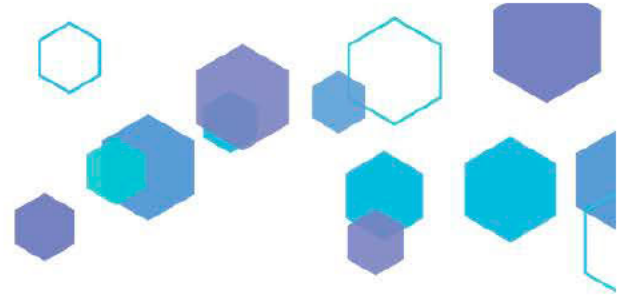
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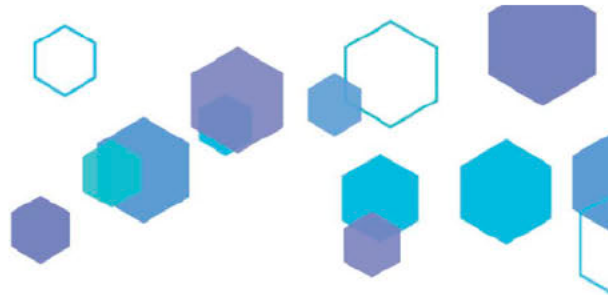
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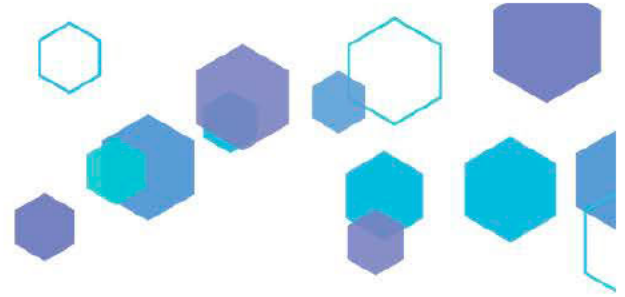
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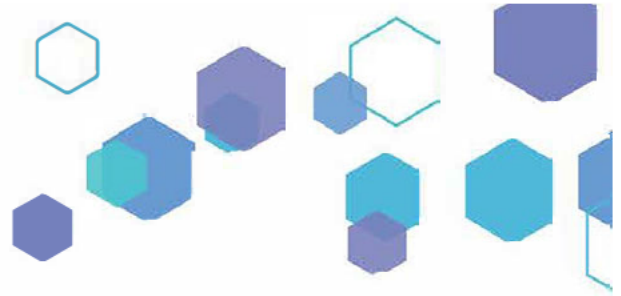
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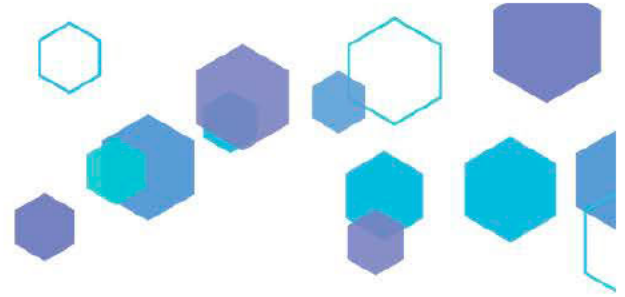
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I understand that the OMMU may disclose to the applicant for Medical Marijuana Treatment Center (MMTC) licensure listed below whether I am authorized to serve as an owner or manager for the MMTC upon licensure, as provided in section 381.986, F.S., Florida Administrative Code Chapter 64-4, and applicable emergency rules.

435.09

Alamanda Farms LLC

MMTC Applicant Name



**FORM 2: WAIVER AGREEMENT AND STATEMENT
For Criminal History Record Checks**

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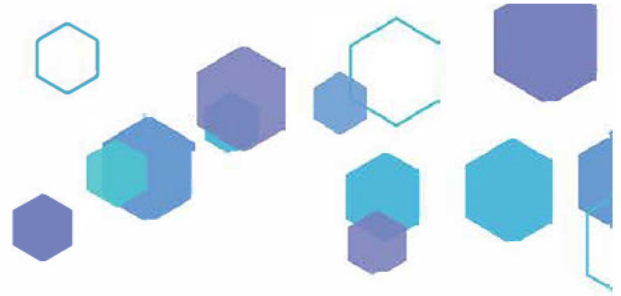
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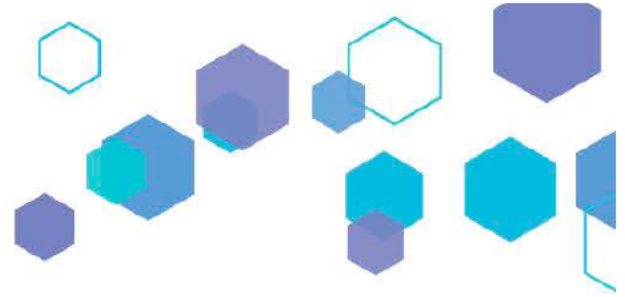
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Section 4.4

Plan for Cultivating Marijuana and Supporting Infrastructure

Subsection 4.4.1 – Cultivation Plan

1. Processes, Methods, & Techniques for Cultivation: Applicant will cultivate both Medical Marijuana and Low-THC Cannabis in indoor cultivation facilities in accordance with the requirements of 381.986(8), F.S. and Department rules. Indoor Cultivation allows for superior quality control. Applicant's team consists of experienced medical cannabis cultivation, processing, and dispensing operators. Applicant's team currently operates a 20,000 sq. ft state-licensed medicinal cannabis cultivation and processing facility in 119.071(3). Applicant will replicate the top-tier cultivation technologies, infrastructure, and systems of that facility, including:

(A) Fully Recyclable Irrigation System: The Applicant will install an automated drip feed irrigation system, which will recapture 90% of the water through dehumidification and air conditioning condensate runoff.

(B) Super Oxygenation System: Exposing the water to ozone results in a sterilized and oxygenated water source. Super oxygenation enhances natural nutrient uptake enabling shorter grow cycles and higher cannabinoid content in stronger, healthier, pathogen resistant plants. The Applicant will utilize three points of ozone injection: nutrient holding tanks, fresh water holding tanks, and condensate holding tanks.

(C) Automated Irrigation System: The Applicant will install the 119.071(3) This controller will monitor pH, EC, temp, media moisture, water flow, and ozone ORP, tank level, and flood/leak sensors. Additionally, the controller will manage all applicable irrigation outputs.

(D) Fertigation System (nutrient dosing): 119.071(3) will automate nutrient mixing, monitoring, and delivery. Applicant has developed proprietary nutrient formulas using eco-friendly ingredients.

Applicant's perpetual harvest system utilizes a nine-week flower cycle and harvests all trays in 1/3 allotments 5.79 times per year. To ensure freshness of product on shelves, Applicant harvests 1/3 of operational trays every 3 weeks. Each stage of the cultivation process will take place in dedicated, isolated rooms to mitigate the risk of pests, mold, mildew, or disease outbreaks. These rooms are optimized through design and environmental control implementations to ensure plant health, quality, potency, and yield of plant stock at each life stage.

Stage 1 – Launch and Mother Stage: Applicant will employ the method of plant tissue culture to establish an initial stock of Mother Plants. Plant tissue cultures are extremely small pieces of plant tissue which do not include any cannabinoids, from carefully chosen and prepared Mother Plants grown under laboratory conditions. The plant tissue culture method will be used for launch because the process is completely sterile and plant tissue allows for quicker growth of Mother Plants compared to seed launch. Whereas seed launch typically takes 23 weeks to identify the strongest genetics, tissue culture propagation takes 6 weeks. Working in a sterile environment, tissue cultures are placed into containers of nutrient-rich micropropagation media consisting of agar gel combined with a specially formulated mix of nutrients, hormones, and sugar. These evolve into Mother Plants and will live in a dedicated Mother Room. Stock plants within the Mother Room are meticulously maintained. Daily care includes hand watering, scouting for pests and pathogens, and pruning plants to promote continuous herbaceous growth. With healthy Mother Plants established, Applicant will begin a perpetual harvest cultivation system based on vegetative propagation, also referred to as “cloning.”

Vegetative cloning of the Mother Plants ensures consistency on a large scale for all finished products. Clone cuttings from a Mother Plant must be carefully identified to avoid overstressing the mother so that it can remain healthy. Ideal clone cuttings should measure between five and six

inches in length and all clones for a given cultivation batch will be cut within a three-day period. Newly cut clones are moved to a Clone Room, placed into clone trays holding 40-50 clones each, and housed on mobile two-tiered wire shelving units. A humidity dome is then misted with fresh water and placed on top of each tray. Each tier of mobile shelving contains its own light source that will slowly intensify over three weeks to promote growth.

Stage 2 - Vegetative Stage: Once clones exhibit strong healthy root development they are transplanted into vegetative trays and moved with their shelving units to a Vegetation Room. Various plant growth training techniques and anti-pest and pathogen procedures are implemented to provide a stable foundation for abundant yields and targeted potency during the flowering phase. Plants will remain in the vegetative stage for 4 weeks under intensive daily checks from plant technicians. After a plant develops a strong root system in the clone rooting tray, the plant is transplanted into a 6"x6" rockwool block. Once transplanted, the plants will be placed into 4'x8' trays with irrigation drippers installed into the media. During the 4 weeks, the lighting intensity periodically increases. Applicant has seen a 95% survival rate from clone plants, and 99% survival rate for vegetative plants.

Stage 3 - Flowering Stage: After 4 weeks, all healthy vegetative plants which have developed sufficient root structures are then advanced to the Flowering Rooms where they will be prompted to begin the flowering stage by reducing exposure to light from 16 hours to 12 hours per day. This shift in light exposure will trigger a final quick burst in plant growth over the first week of the flowering stage. The optimal size of each plant's vertical canopy is between 28 – 34 inches, with the maximum vertical canopy height for plants in the Flower Room at 40 inches. The full-sized plants will remain in the Flowering Room for nine weeks. As flower development progresses, central flower clusters known as colas will form towards the tops of the main stems and branches

of the plant, which develop a layer of outgrowth known as trichomes. Trichomes contain the highest concentration of cannabinoids and terpenes of any part of the plant and thus provide most of the medicinal value and distinguishing characteristic of the final usable medical product. Cultivation staff will carefully monitor trichome color development to ensure a proper harvest and a consistent medical product. Light intensity will gradually increase each week and will be strain dependent. Throughout the 9-week flowering cycle, staff will ‘skirt’ each plant by removing lower non-productive plant material. Plants will be defoliated to promote air movement and light penetration. Both defoliation and skirting of plants assist in pest and disease mitigation.

Stage 4 - Harvesting, Drying and Curing Stage: Cultivation staff harvest fully mature plants by cutting the plant at the base of its stem. Once harvested, plants are moved to the Drying Room for up to two weeks. The Post-Production Manager will determine optimal moisture content levels for individual cultivars and perform routine daily inspections in accordance with mold and mildew mitigation SOPs. Moisture sensors will be attached to various drying plants throughout the room. The Drying Room will be maintained at 60-63 degrees Fahrenheit, with a variable humidity setpoint.

Once harvested plants have dried to an appropriate moisture content, they are broken down by hand into flowering buds, which are placed into food-grade plastic bins to begin the curing process. During curing, managers will perform daily “burping” of each tub, where they will take moisture content readings and conduct inspections for pests, mold, mildew. The curing room environmental setpoints are managed at 50-70 degrees with humidity between 50-65%. Cured, finished product then undergoes testing at a CMTL.

2. Strains:

Low-THC Options			
	Strain	THC Percentage	CBD Percentage
1.	Candida	0.8 %	17.57 %
2.	AC/DC	0.7 %	13.00 %

	Strain	THC Percentage	Dominant Terpene
1.	Peach Flame	21.40 %	Myrcene, Linalool, Pinene
2.	Master Kush	20.54 %	Beta-Caryophyllene, Limonene, Myrcene
3.	Burnt Toast	22.40 %	Beta-Caryophyllene, Limonene
4.	Bender	20.58 %	Limonene, Pinene, Myrcene
5.	Jelly Donut	18.67 %	Beta-Caryophyllene, Limonene
6.	Watermelon Starburst	24.90 %	Limonene, Beta-Caryophyllene
7.	Ethos Glue	27.50 %	Beta-Caryophyllene, Limonene, Linalool
8.	Platinum Kush Breath	26.00 %	Beta-Caryophyllene, Limonene
9.	Blue Cheese	24.90 %	Beta-Caryophyllene, Limonene, Humulene
10.	TK91	26.05 %	Myrcene, Beta-Caryophyllene, Limonene
11.	Pink Cookies	22.80 %	Beta-Caryophyllene, Limonene, Myrcene

3. Annual Cannabis Production: Applicant's proposed facility will launch with 300 flower trays housed in Building #2. Each tray will produce 5 lb. of dried Cannabis product per harvest and will be harvest an average of 5.79 times per year over time, yielding 8,685 lb. of dry flower annually, with an additional 3,474 lb. of trim biomass for extraction and processing operations. Additionally, if patients require more medicine, Applicant has the capacity to convert Building #5 into an additional 225 flowering trays, increasing flower produced by 6,513 lb. annually.

4: Adequate Supply of Cannabis: As of March 31, 2023, there were 804,066 Qualified Patients registered in Florida's Medical Marijuana program. Applicant's market analysis assesses a current market size of \$1,447,318,800, with the average patient spending \$1,800 annually for Medical Cannabis medicine. As of March 31, 2023, there were 551 active MMTC dispensing locations serving patients statewide. Assuming an even distribution of patients across dispensing locations, the average MMTC dispensing location conducts \$2,626,713 in sales of Medical Cannabis and

low-THC Cannabis annually. Using these revenue calculations and internal models encompassing real world processing data from other medical markets, Applicant projects each dispensary requires the production of approximately 476 lb. of dried Cannabis Flower. The applicant is proposing 6 medical dispensaries for launch, which would require the production of 2,856 lb. of dried Cannabis Flower. Applicant has max capacity to produce 15,198 lb. per year, which is enough flower to service 27 dispensaries. The proposed facility gives the Applicant the opportunity to increase access and inventory levels as the medical market increase demand.

5. Additives, Pesticides, Fungicides, & Herbicides: Applicant will not use any substance defined as a “pesticide” under Section 487.021(49), F.S., and Applicant’s cultivation managers have experience successfully running cannabis cultivation facilities without the use of such substances. Applicant will employ a proven combination of pest control measures including environmental control infrastructure, Integrated Pest Management (IPM) program, strict sanitation & hygiene operating procedures, and the use of super-oxygenated water.

6. Pest Inspections & Remediation: Applicant will maintain ongoing inspections to identify the presence of any threatening pests as defined by section 581.011(26), F.S. and identified in Rule 5B-2.0025, F.A.C. Inspections will be conducted daily by Plant Technicians for plant stock in every stage of the cultivation cycle. Throughout each stage of plant cultivation, beneficial predator insects are introduced including *Phytoseiulus Persimilis*, Swirski Mite, *Cucumeris*, *Californicus*, and Rove Beetle. These ‘beneficials insects’ do not damage plants and only feed on cannabis-consuming pests. The Cultivation Manager will perform a daily inspection of all beneficial insects and note findings in the beneficial inspect inspection log in accordance with Standard Operating Procedures. Additionally, the Cultivation Manager will attach one yellow and one blue sticky trap every 100 square feet in each growing area. Yellow sticky traps are used to monitor populations

of common pests and any presence of spider mites. Blue sticky traps are used primarily for monitoring thrips. Each day, staff will inspect all mother plants, sticky traps, and the top and bottom of a few fan leaves from each vegetative and flowering tray in operation. They will record their findings in a “Pest Monitoring Log.” Applicant will remain vigilant in identifying any pests that may be threatening to the horticulture or agriculture of Florida as identified in the DACS rule. Should such a pest be found, Applicant will report the finding to DACS and the Department of Health and proceed to comply with DACS regulations relating to quarantine and stop-sale procedures. All such infested plants or plant material will be isolated and all plant and plant material at the facility will be inspected to determine the extent of the infestation.

7. Inventory Tracking: Applicant will employ the 119.071(3) seed-to-sale tracking system. Using the system, employees monitor and electronically record each tissue culture, seed, and plant used at the facility from “seed to sale”. System enables the Applicant to provide the Department with real-time, 24-hour access to cultivation data.

Staff will enter the number of clones cut, track survival rates, and monitor the mother plant inventory. Each clone tray will be tracked by a batch number printed on a plant tag. Each mother plant will have its own plant tag with a unique identification number. Once a plant moves from clone to vegetative status, the plant will be tagged and assigned its own unique identification number. Following three weeks in the vegetative stage of production, plants are moved into the flower stage. Employees of the Applicant will make such adjustments in the tracking system to show the plant’s current location. After each plant is harvested, the individual wet plant weight is entered into the tracking system. The plants are transferred from a Flower Room into a Drying Room where each plant tag will remain in place on the plant stem. After plants complete two weeks of drying, they are moved into food grade plastic containers where they will spend the next two

weeks curing. Plants will be batched by cultivar during which the individual plant identification number is consolidated into an autogenerated batch number which will follow the product through sale. During the trimming stage, the Postproduction Manger will monitor all plant handling activities and reconcile with the inventory tracking system, including batch weights of final bud weight, trim weight, and waste weight. During packaging and production of pre-roll flower, each individual unit made will be entered into the tracking system. During the processing stage, trim will be weighed and placed into a CO2 extraction machine. The crude oil will be weighed and entered into the tracking system. The remaining trim will be treated as green waste and logged as such in the tracking system. Once the refined oil is placed into its final form, quantities and weights will be entered into the tracking system.

8. Plan for the Fumigation, Treatment, & Destruction of Infected/Infested Plants: Infested or infected plants are immediately quarantined by moving them into sensitive waste storage and rendered useless and destroyed in accordance with waste SOPs and regulations. During each stage of cultivation and post-production, quality control inspections will be conducted of all inventories and in-process products. These inspections will be conducted by educated staff that are able to effectively identify infested or infected plants. Any infested or infected plant will immediately be moved into a sealed container and placed into quarantine pending test results. Once a test confirms the plant is infested or infected, the Cultivation Manager will conduct an inventory review to identify any other potential plants that may have been impacted. Applicant believes quality control in this space is extremely important to maintain customer loyalty and will not remediate or fumigate any infested or infected plants.

9. Sanitation & Waste Disposal: Upon licensure, Applicant will engage AIB International, a world-renowned Food Safety partner who has been in operation for over 100 years, consulting

with large scale food and beverage companies around the world on best practices. Additionally, Applicant has developed operating plans which include guidance from the Florida Department of Agriculture & Consumer Services on GMP certification, including: (1) Hygiene, (2) PPE, (3) Handwashing facilities, (4) Illness reporting, (5) Restrictions on eating, drinking, chewing gum or smoking in facilities, (6) Proper storage, (7) Construction guidance, including adequate drainage, ventilation, and lighting, (8) Sanitation guidance and pest control, (9) Water Supply, temperature controls, waste management, and (10) Prevention of cross contamination.

Applicant will utilize AIB's GMP training course and 6 months of consultation to ensure it passes the Food Safety Good Manufacturing Practices inspection within 12 months of operation. In accordance with 21 CFR, applicant operating plans include risk-based preventive controls for each phase of the organization, and employees are trained during onboarding to execute a wide variety of sanitation and hygiene rules for each stage of the supply chain. Additionally, the cultivation team, processing team, and each dispensary will form a sanitation committee. Each committee appoints a Team Leader, who is incentivized with cash bonuses for ensuring sanitation and hygiene protocols are met for each department. The Team Leader receives a bonus and is allocated a second bonus to issue to a team member each month, which incentivizes all staff to comply with sanitation and waste disposal operating principles. The Chief Operating Officer is responsible for SOP updates and will sign up electronically for FDA guidance updates and Department regulatory updates. Relevant guidance documents will be included in updated SOPs on a quarterly basis.

The Applicant will maintain a secure "Marijuana Waste" closet in each cultivation, processing and dispensary facility. Closets and containers will be clearly labeled as "Marijuana Waste" and secured with an RFID encrypted access control system. Once the container is full, the marijuana waste will be rendered unusable and unrecognizable by mixing it with a substance such as coffee

grounds, sawdust, or other non-toxic materials to a ratio of 70% compostable substance to 30% marijuana products. The waste mixture will be placed in a non-transparent, puncture-resistant container that is securely sealed and labeled as "Non-usable Marijuana Waste". The Applicant will transport the unusable packaged marijuana waste mixture to a licensed medical waste incinerator or disposal facility authorized to receive marijuana waste, where it will be disposed of in accordance with applicable state and federal regulations.

The Applicant will maintain a current Marijuana Waste Log utilizing the 119.071(3) seed-to-sale tracking system. All disposal records and documentation will be kept on file for a minimum of three years and made available for inspection upon request by state or federal authorities. The plan outlines which managers and employees are involved in the waste management process, requirements for monitoring and tracking marijuana waste metrics, and procedures for storing, rendering, and disposing of waste. Rendering products unusable will be carried out by at least two employees, at least one of whom will be a manager, and will take place under video surveillance. Applicant will provide notice of plans to render marijuana waste 72 hours in advance.

119.071(3)

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Subsection 4.4.2 – Cultivation Infrastructure

All cultivation will take place at the Applicant's 119.071(3)

1. Proposed Cultivation Facilities: The property is owned by the Applicant and currently used for commercial hemp cultivation. There are five existing buildings on the property, formally used for agriculture processing.

119.071(3)

Existing Buildings on Applicant's Hemp Farm

2. Capacity of Growing Areas: Four of the five preexisting structures will be retrofitted to the standards required by the Department to operate a state-of-the-art indoor cannabis cultivation facility. The fifth building will be retrofitted to provide additional flower trays contingent on market demand. The total proposed capacity of Growing Areas for all 5 buildings is 19,574 sq. ft.

A description of the rooms and uses of each building include:

Building #1: Propagation Center A: 1,722 sq. ft. - [Capacity of Growing Areas: 626 sq. ft.](#)

- Men's Locker Room: 108 sq. ft.
- Women's Locker Room: 108 sq. ft.
- Employee Break Room: 108 sq. ft.
- Security Closet: 40 sq. ft.
- Office: 100 sq. ft.
- Clean Room: 80 sq. ft.
- Shipping/Receiving Area: 120 sq. ft.
- Dry Storage Area
- [Clone Room: 80 sq. ft.](#)
- [Mother Room: 546 sq. ft.](#)

Building #2: Veg and Flower Center 20,000 sq. ft. - **Capacity of Growing Areas: 11,200 sq. ft.**

- Men's Locker Room: 108 sq. ft.
- Women's Locker Room: 108 sq. ft.
- Employee Break Room: 108 sq. ft.
- Office 1: 100 sq. ft.
- Office 2: 100 sq. ft.
- Security Closet: 40 sq. ft.
- Clean Room: 234 sq. ft.
- Shipping Receiving: 746 sq. ft.
- Veg 1: 1400 sq. ft.
- Veg 2: 1400 sq. ft.
- Flower 1: 1400 sq. ft.
- Flower 2: 1400 sq. ft.
- Flower 3: 1400 sq. ft.
- Flower 4: 1400 sq. ft.
- Flower 5: 1400 sq. ft.
- Flower 6: 1400 sq. ft.

Building #3: Post-Production Center A: 7,800 sq. ft.

- Shipping and Receiving: 120 sq. ft.
- Packaging Room: 400 sq. ft.
- Machine Trim Room: 400 sq. ft.
- Curing Room: 400 sq. ft.
- Vault: 400 sq. ft.
- Drying Room: 1,664 sq. ft.
- Security Closet: 40 sq. ft.
- Office 1: 100 sq. ft.
- Office 2: 100 sq. ft.
- Employee Breakroom: 108 sq. ft.
- Men's Locker Room: 108 sq. ft.
- Women's Locker Room: 108 sq. ft.
- Clean Room: 405 sq. ft.
- Pre-Extraction Room: 200 sq. ft.
- Extraction Room: 200 sq. ft.
- Post-Extraction Room: 300 sq. ft.
- Kitchen: 700 sq. ft.

Building #4: Propagation Center B: 1,824 sq. ft. - **Capacity of Growing Areas: 196 sq. ft.**

- Men's Locker Room: 108 sq. ft.
- Women's Locker Room: 108 sq. ft.
- Employee Break Room: 108 sq. ft.
- Security Closet: 40 sq. ft.
- Office: 100 sq. ft.
- Shipping/Receiving Area: 120 sq. ft.

- Clean Room: 80 sq. ft.
- Dry Storage Area
- Clone Room: 80 sq. ft.
- Mother Room: 776 sq. ft.

Building #5: Veg and Flower Center 15,000 sq. ft. - **Capacity of Growing Areas: 7,552 sq. ft.**

- Clean Room: 234 sq. ft.
- Shipping Receiving Bay: 200 sq. ft.
- Men's Restroom/Locker Room: 108 sq. ft.
- Women's Restroom/Locker Room: 108 sq. ft.
- Employee Break Room: 108 sq. ft.
- Office 1: 100 sq. ft.
- Office 2: 100 sq. ft.
- Security Closet: 40 sq. ft.
- Flower 1: 944 sq. ft.
- Flower 2: 944 sq. ft.
- Flower 3: 944 sq. ft.
- Veg 1: 944 sq. ft.
- Veg 2: 944 sq. ft.
- Flower 4: 944 sq. ft.
- Flower 5: 944 sq. ft.
- Flower 6: 944 sq. ft.

3. Cultivation Environment: All cultivation stages will take place in indoor sealed and environmentally controlled rooms. All cultivation rooms in the facility will be retrofitted with

nonporous material. All paint and floors in the facility will be non-porous and equipped with specialized coating that blocks odor permutation.

All rooms will be constructed in a manner that is airtight when doors are closed, the HVAC balanced to each room maintains a positive pressure environment. There will be no windows in the facility and there are no points of ingress and egress in areas where sensitive product is held. Different

119.071(3)

departments within the facility will be compartmentalized to reduce the risk of exposure to potential contaminants for both employees and plants. All rooms will be adequately sealed and all air entering the cultivation facility will be screened through a high-micron filtering system. Specific environmental setpoints for each stage in the plant lifecycle include Mother and Veg Rooms (70-80 deg, 60-75% RH), Flower Room (70-85 deg, 50-75% RH), Drying Room (50-70 deg, 40-60% RH), Curing Room (50-70 deg, 50-65% RH).

4. Odor Mitigation: The Applicant will construct the facilities in a manner which mitigates adverse odor from escaping to the exterior area. Applicant has identified areas with high odor impact, and will implement the following plan to mitigate those odors:

Facility-Wide Measures: Closed-cell spray foam insulation will be utilized in all exterior walls and in high odor impact interior walls. All ingress/egress doors will be hollow metal framed with metal doors. Each door will be equipped with rubber gasket weather stripping and drop-down sealed sweeps to reduce the airflow from the facility to the outside of the premises. Similar measures will be utilized for interior doors in high odor impact areas of the facility. All points of air exchange in the facility (e.g., doors and exhaust points) will be equipped with carbon-activated charcoal filtration units to mitigate any adverse odor from escaping the facility to the surrounding areas.

High Impact Area: The harvesting of plants has the highest odor-emitting potential as plants are handled by employees and moved inside the facility. Odors will be contained within Flower Rooms with the use of closed-cell spray foam insulation on the walls and ceilings, creating an air-tight barrier. Additionally, the door will be constructed with advanced weather stripping and drop-down sealed sweeps. Furthermore, charcoal-activated carbon filtration units will be placed strategically outside the Flower Room doors.

5. Cultivation Systems:

a. Mobile Racking & Lighting: Using a 2-tier mobile racking system manufactured by Pipp

119.071(3)

Horticulture enables the Applicant to cultivate 130% more dried flower in the same square footage, driving down the cost per pound for patients. Each tier will have its own lighting array. All areas of the cultivation facility will be lit by Fluence LED lights, utilized for their significantly

improved energy efficiency and lower heat output than traditional HPS lighting.

b. Nutrient Dispersal System: An H.E. Anderson nutrient injector system will be installed to

119.071(3)

maintain proper nutrient balance throughout the fertigation and irrigation recycling system. Due to the closed-loop nature of the fertigation system, nutrients that would otherwise be considered wastewater and disposed in the sewers are recycled and filtered. Water is then rebalanced by the Nutrient Injector before

returning to the plant root system. Regular testing of the fertigation (input and runoff water) and plant tissue will be used to ensure the accuracy of the system and overall health of the plants.

Unlike competing designs, H.E. Anderson Injectors utilize positive displacement diaphragm pumps which ensures injection rates will not degrade over time. Applicant will use a custom

proprietary recipe made from elemental compounds designed specifically to maximize cannabis growth and potency, allowing applicant to adjust the recipe to provide the proper amount of nutrients without producing excess waste.

c. Power Supply: Primary electric supply will be provided by the 119.071(3)

Each building will be equipped with sufficient electrical service to manage full capacity operations. Each facility will be equipped with a dedicated security generator to ensure uninterrupted operations in the event of power failure.

d. Data Collection: Applicant will utilize the 119.071(3) and

Agrowtek lighting and environmental control system. Both the 119.071(3)

have a variety of sensor inputs such as humidity, temperature, media moisture, CO₂, oxygen, light intensity, irrigation temperature, irrigation electrical conductivity, and irrigation pH. All inputs are saved into user-friendly software, which allows Applicant to track trends and make objective data driven decisions during the cultivation process. The sensor input and control output data will be compared to production metrics in 119.071(3).

6. Irrigation System: Applicant has contracted 119.071(3) to assist in the design of the irrigation system. Applicant will install a 119.071(3)

Each plant will only utilize 5-10% of the water fed into the medium. 90-95% of the fed water will be evaporated into the air, which will be removed by the dehumidification units. Each dehumidification and air conditioning unit will have condensate run-off and each room will have a dedicated condensate collection tank. All condensate collection will pass through multiple bag filters, then be injected with ozone prior to returning to the holding tanks. In addition to sterilizing the condensate return water, all irrigation water holding tanks will pass through the ozone injector. Ozone (O₃) functions to sterilize and super-oxygenate the water, allowing for more frequent

watering without creating anaerobic conditions in the plant. Additionally, the O₃ water system increases the bioavailability of nutrients, allowing plants to absorb available nutrients more easily.

7. Environmental Control System: All environmental units will be controlled with the 119.071(3) [REDACTED]. Temperature and humidity sensors will be installed throughout each facility and wired back to the controller head unit. The controller will manage every piece of 119.071(3) [REDACTED] and will send real-time data to the sensor inputs, and controller outputs. As described in the Data Collection section above, 119.071(3) [REDACTED] will collect and filter all applicable data.

8. Back-up Systems for Cultivation Infrastructure: Applicant will utilize a dedicated standby generator made by 119.071(3) [REDACTED] for the security system and security lighting. Additionally, Applicant will install dedicated standby generators to ensure the cultivation operations remain uninterrupted. Applicant will maintain a service contract for all generators with a licensed contractor. In the event of power failure, the Department will be notified.

119.071(3)

Applicant Fully-Recyclable Irrigation System

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Subsection 4.4.3 – Ability to Secure Cultivation Infrastructure

1. Infrastructure the Applicant Has Secured as of the Date of Submission:

(A) Proposed facilities: Applicant owns a 50-acre property in 119.071(3) with 5 existing buildings.

(B) Lighting: Applicant has signed a purchase agreement with Fluence Bioengineering for the purchase of clone, mother, veg and flower lights. Applicant has partnered with Fluence on 3 active cultivation facility buildouts and has contractual agreements that lights can be onsite within 4 weeks of final purchase.

(C) Racking: Applicant has partnered with 119.071(3) to source racking and tray systems for 3 active cultivation facility buildouts. Similar to the relationship with Fluence, 119.071(3) has provided assurances that racking, and tray delivery can be made in 5 weeks. Applicant has provided the 119.071(3) design team with the proposed facility layouts for each building. Upon completion of final design, Applicant will purchase the racking and trays to launch flower and vegetative operations.

(D) Irrigation & Fertigation Systems: Applicant has commissioned 119.071(3) to produce a full facility irrigation design plan, as well as a detailed irrigation parts list. Applicant has purchased irrigation tanks, pumps and valves which are currently stored in 119.071(3), to be shipped to Florida after licensure. All smaller irrigation parts are readily available from local supply vendors.

(E) Security System: Applicant has executed an agreement with 119.071(3) for quick shipment and favorable payment terms on intrusion alarm, video surveillance, access control and visitor management system.

(F) Product Vault: Applicant has a current account with 119.071(3)

will complete vault installations within 4 weeks of final design signoff by Department.

(G) Live Tissue Culture: Explants used by Applicant for each of the cultivars proposed in the strains section have been secured. Tissue cultures consist of plant tissue containing not more than 0.3% THC on a dry weight basis. Such tissue culture is classified as “hemp” under federal law and is not controlled under the federal Controlled Substances Act. The federal Drug Enforcement Agency affirmed this definition in two separate formal letters issued January 6, 2022, and December 20, 2022. The material is likewise defined as hemp under Florida law in section 581.217(d), F.S. As a licensed hemp cultivator in the State of Florida, Applicant will be able to transport the plant tissue culture and store it at its licensed hemp cultivation and processing facilities, which will convert to cannabis cultivation upon licensure by the Department.

(H) Service Agreements: Applicant has service agreements in place with vendors for the following service areas:

- | | |
|--|--|
| • Environmental Control System:
Agrowtek Inc. | • Back-Up Power Generation: Zaps
Electrical |
| • Fertigation System: HE Anderson | • Irrigation System: Demeter Designs |
| • Lighting: Fluence Bioengineering | • Security Vault: 119.071(3) |
| • Racking Systems: Pipp Horticulture | • HVAC: Surna Cultivation Technologies |
| • Circulation Fans: Vertical Air Solutions | • Agricultural Pest-Management: BioBee |
| • Security System: 119.071(3) | |

2. Infrastructure Applicant Has Not Yet Secured:

(A) HVAC: Applicant has partnered with Surna Cultivation Technologies, a HVAC engineer and design that specializes in cannabis cultivation. Surna will design and source all HVAC equipment for Applicant after licensure.

(B) General Business Supplies & Equipment: Applicant is in process with a credit application with Grow Generation, a publicly traded organization that is the leading supplier of cannabis business supplies and infrastructure. This working partnership will ensure quick shipment of a broad range of equipment and soft goods, which will be ordered on a monthly recurring basis during operations.

(C) Building Trades: Will be hired locally after licensure.

3. Timeline for Cultivation Authorization:

While the commission is evaluating applications, applicant is moving forward with **119.071(3)** [REDACTED] who will manage the development of a permit set of construction documents that will be used for contractor bidding and local permitting. Applicant is working with the municipality to receive permitting approval to commence construction immediately upon licensure. Additionally, Applicant will order all HVAC components and cultivation lights as these two equipment categories have the longest lead times. Upon approval, with plans and permitting complete, Applicant will prioritize Building #1, a 1,700 sq. ft existing building on the property which is to be used as the Propagation Center. The Propagation Center houses the Mother and Clone Rooms, with ample space to cultivate enough clones to service all flower trays outlined in the proposed facility. The rough-in construction will commence immediately following licensure with the priorities of work being framing, electrical, plumbing, HVAC, and security system. After inspections, Applicant will close walls, epoxy floors, and start the finish work for electric, plumbing, HVAC and irrigation. Mother and clone lights install will

then occur. Local inspections will take 1-week and Applicant will be issued a certificate of occupancy for Building #1, Propagation Center, within 45 days of licensure. Applicant will then notify the Office of Medical Marijuana Use and submit a Request for Cultivation Authorization. After receiving Written Notice of Authorization, Applicant will then commence growing out the first batch of plants from tissue cultures, the most efficient and genetically consistent way to launch a cannabis cultivation facility.

4. Assumptions Made in the Authorization Timeline:

(A) Applicant assumes plans will be complete in a 30-day window.

(B) Applicant assumes construction permits will be issued within a 90-day window.



Applicant Flower Room with Tiered Mobile Racking System



Rockwool Grow Medium Being Used in Applicant Facility

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119.071(3)





Suwannee County

224 Pine Avenue Live Oak, FL 32064

Phone: 386-364-3401

Fax: 386-364-3754

April 24, 2023

Re: Medical Marijuana on **119.071(3)** 26-03S-11E-11838-001002

To Whom It May Concern,

Please be advised that the above-mentioned property is located in an Agriculture-1 zoning district which allows for a variety of agriculture uses including cultivation of crops and processing, storage, and sale of agriculture products and commodities. I am writing to confirm that the cultivation of cannabis in compliance with state regulations is an approved use on Alamanda Farms' proposed cultivation site located at **119.071(3)**

119.071(3) The cultivation of cannabis is only permissible once Alamanda Farms has obtained final state licensure and all required regulatory approvals from the State of Florida.

Should you have any further questions, please contact me at **119.071(3)**

Sincerely,

Ron Meeks

Development Services Director

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Section 4.5

Plan for Processing Marijuana and Supporting Infrastructure

Subsection 4.5.1 – Processing Plan

The Applicant will process Medical Marijuana and low-THC Cannabis products into a variety of final usable derivative products. All processing will take place in a dedicated post-production building separate from other plants or products. All facilities, procedures, and practices will comply with the standards of the U.S. Food and Drug Administration's Good Manufacturing Practices as well as all applicable local, state, and federal rules and regulations.

1. Methods of Extraction: Applicant will utilize the method of Supercritical Carbon Dioxide Extraction in a closed loop system. The closed loop system will comply with design and safety requirements established by Florida statute and Department Rules including 64ER21-13 -MMTC Solvent Based Extraction. Supercritical Carbon Dioxide Extraction, or CO₂ Extraction, is safer, easier, and more effective than other solvent-based extraction methods. CO₂ Extraction does not involve the use of compressed flammable gas such as butane or propane, and commercially available machines are safety tested and meet Department requirements as closed loop systems. Supercritical CO₂ is chemically stable, reliable, low-cost, non-toxic, non-flammable and readily available, making it a desirable as an extraction solvent. Crucially, CO₂ solvent extraction leaves no harmful residue on the final product.

Finished dried plant material is ground into 300-micron diameter pieces and is placed into an extraction compartment component of the closed-loop extraction system. The extraction compartment is then filled with liquid CO₂. Heat and pressure are applied to the liquid CO₂ until the CO₂ transforms from a liquid to a supercritical fluid. In a supercritical state, the CO₂ simultaneously possesses properties typical of a liquid and a gas. As a result, when the supercritical CO₂ saturates the plant material, it will extract compounds from the plant material through diffusion, as a gas solvent does, and dissolution, as a liquid solvent does. After allowing sufficient

time for proper extraction, processing staff will open a valve introducing air flow to the extraction system. Supercritical CO₂ then flows into an adjoining separation compartment kept at lower pressure. When supercritical CO₂ enters the lower pressure environment it quickly transforms into a gaseous state. The extracted compounds suspended in the supercritical CO₂ separate from the gas and fall to the bottom of the separation compartment where they will later be collected. The CO₂ gas rises out of the separation chamber and flows into a cooling tower where it is recondensed into a liquid. The recondensed liquid CO₂ is then pumped back to the extraction compartment. Winterization then follows the extraction of crude oil, where the crude oil is placed in a sub-zero freezer for 24 hours, so the oil reaches a target temperature of -80 degrees Celsius. After reaching the correct sub-zero temperature, the crude oil is filtered to separate out the fats, lipids, waxes, and chlorophyll. The extracted compounds are collected by staff and placed into an asymmetric centrifugal SpeedMixer where they are mixed until homogenous. The homogenous mixture of Cannabis oil then undergoes another filtration phase and is decarboxylated. A decarboxylation reactor with a 40L reservoir will be used to convert THCA into THC. The Processing Manager will determine optimum decarboxylation times and temperatures for each cultivar. The batch will be identified and logged in the seed-to-sale tracking program to enable appropriate Retail Batch samples to be collected for testing by a CMTL.

2. Solvents & Gases: Solvents & Gases used by Applicant include carbon dioxide. Applicant will use carbon dioxide in both a liquid and supercritical state and is defined by Department Rule 64ER21-13 as “Carbon Dioxide Solvent”. In compliance with 64ER21-13, the Carbon Dioxide Solvent used will have a minimum purity of 99.5% and Applicant will only acquire solvent with a certificate of analysis from the manufacturer to confirm purity, which will be kept on record by the Applicant. The solvent will be free of odorants, bitterants, and any other additives. Applicant

will store, handle, and dispose of the solvent in accordance with all local, state, and federal regulations. The safe & proper handling of all solvents and gases will be outlined in Applicant's Standard Operation Procedure for Processing Operations. Safety will also be ensured through proper design standards and inspection certification. SOPs will be based on Manufacturer safety specifications and all employees will be thoroughly trained and evaluated on all aspects of the SOPs before they can begin work.

3. Ensuring Final Product Compliance with Acceptable Limits: Plant material for processing will consist of material from one Flower Batch, as defined by the Department's CMTL Definitions rule. Only usable plant material of the same cultivar, cultivated with the same agricultural agents and harvested at the same time will be used as the source material for each batch, which helps guarantee uniform and expected cannabinoid profile and organic composition. The flower batch will be entered and tracked in **119.071(3)** Applicant will use processes to ensure compliance with 64ER22-8, Dosing and Supply Limits for Medical Marijuana, as well as 64ER20-35, Standards for Production of Edibles. After the marijuana oil is extracted and homogenized, the derivative batch will undergo a round of testing analysis by a department approved Certified Marijuana Testing Laboratory (CMTL). In addition to standard contaminant testing, Applicant will order cannabinoid and terpene levels for the batch. Production Manager will determine the appropriate dilution level for the batch to maintain required dosage in each single serving edible. Calculations will be based on the testing analysis results and the quantity of oil in the batch. Once the marijuana oil is further processed into a final product, two randomly selected products from each category are sent to the CMTL to ensure the batch of products was produced in compliance with acceptable limits. Applicant will contract with an independent testing laboratory to perform audits on standard operating procedures, testing records, and samples and provide the results to the department to

confirm that the low-THC Cannabis or Medical Cannabis meets the requirements of this section and that the Medical Cannabis and low-THC Cannabis is safe for human consumption.

4. Record Maintenance for Testing & Samples: Applicant's detailed documentation of each batch formulation and movement throughout processing in the seed-to-sale tracking system will ensure all batch-specific testing samples are properly identified and provided for testing. Samples taken for testing will be tracked as such in 119.071(3). Final products will not be transported to Applicant dispensing locations until the testing sample has been certified acceptable by the CMTL. Applicant will retain records, including CMTL issued Certificates of Analysis, of all testing and samples of each retail batch for at least nine months. Applicant will reserve two processed samples from each batch and retain such samples for at least 9 months as part of required auditing. Detailed recordkeeping and logs, including accurate tracking in the seed-to-sale system, ensure the ability to maintain accountability of all raw materials, derivative products, final products, and any biproducts for testing, sample auditing, and to prevent diversion or unlawful access to or possession of regulated materials and products.

5. Treatment of Final Product that Fails to Meet Testing Requirements: Applicant will not attempt to remediate failed batches and will dispose of the entire batch in accordance with sensitive waste SOPs. Applicant will notify the Department by email within seven days of receipt of the failed Certificate of Analysis. All products associated with a batch that fails to meet testing requirements will be immediately moved to a quarantine section in the Postproduction vault. All products from the retail batch will be clearly labeled "Not for Retail Sale" and the seed to sale tracking system for all products associated with the batch will be marked for sensitive waste destruction. The product will be rendered unusable and unrecognizable in accordance with Waste Disposal SOPs and logged accordingly in 119.071(3).

6. Quality Assurance Program to Track Incidents and Document Causes & Action(s): Quality

assurance protocols are included in SOPs found in every segment of the supply chain and plant lifecycle. Employees and team leaders are tasked with daily and weekly inventory audits, where checklists must be filled out regarding plant health, in-process product storage conditions and finished inventory. Department heads are responsible for checklist reviews to close out each day. If a contamination incident is identified, the Postproduction Manager will be notified immediately and will remove the affected batch from the supply chain. The Postproduction Manager will fill out an incident report, identifying the issue that occurred and corrective steps taken. The COO must sign off on this document before destruction of product. The contaminated batch will immediately be removed and stored in the quarantine section of the vault. Postproduction Manager will track corrective actions in the seed to sale system and implement sensitive waste protocols. Following destruction of the contaminated batch, the Safety Committee will meet to review the reports and suggest corrective actions to mitigate any risk of the incident occurring again.

7. Ability to Pass a Food Safety Good Manufacturing Practices Inspection: As identified in

the Business Plan, subsection 4.8.3, Applicant launch plans include requesting processing authorization on day 74 post licensure. Upon licensure, Applicant will engage AIB International, a world-renowned Food Safety partner who has been in operation for over 100 years, consulting with large scale food and beverage companies around the world on best practices. Additionally, Applicant has developed operating plans which include guidance from the Florida Department of Agriculture & Consumer Services on GMP certification, including (1) Hygiene, PPE, handwashing facilities and illness reporting (2) Restrictions on eating, drinking, chewing gum or smoking in facilities (3) Proper storage (4) Construction guidance, including adequate drainage, ventilation, and lighting (5) Sanitation guidance and pest control (5) Water Supply, temperature

controls, waste management and (6) Prevention of cross contamination. Applicant will utilize AIB's GMP training course and 6 months of consultation to ensure it passes the Food Safety Good Manufacturing Practices inspection within 12 months of operation.

8. Nationally Accredited Certifying Body: Applicant will utilize the National Products Association ("NPA") for the Food Safety Good Manufacturing Practices ("GMP") inspection within 12 months of operation. NPA was the first organization to offer a third-party GMP certification program for the manufacturing of dietary supplements and dietary ingredients, outlining guidelines 8 years before the FDA published the final GMP regulation specific to dietary supplements (21 CFR 111). NPA regularly updates its guidance, tracking FDA guidance for industry-best standards. Applicant intends to meet NPA standards using guidance from the Florida Department of Agriculture & Consumer Services on GMP certification and consulting and training services from AIB International. Applicant will begin working with NPA 3 months before inspection, where NPA will initially commence review of SOPs and provide guidance before inspections begin.

9. Plan for Packaging & Labeling of Usable Products: All packaging will comply with the United States Poison Prevention Packaging Act of 1970 and Department regulations. All usable products shall be placed inside of a receptacle at the facility. All receptacles will be plain, opaque, white and child resistant without depictions of the product or images other than the Applicant's department-approved logo, the universal symbol, a QR code to certificate of analysis and labels. All text will be a single solid color (not neon). Packaging will have a firmly affixed and readable label that includes only the information required or permitted by s. 381.986(8)(e)11.f., F.S., and Department rules, including:

- Applicant Name
- Batch Number & Harvest Number

- Date Dispensed
- Physician name and patient name
- Universal Symbol
- Expiration Date
- Dosage Form, including Concentration of THC & CBD
- All ingredients by prominence

Additionally, packaging will bear the following legible and prominent warnings:

- *Keep away from children and pets.*
- *This edible has not been produced or inspected pursuant to federal food safety laws.*
- *It is illegal to transfer medical marijuana to another person.*

Receptacles for usable products in a form for smoking shall have a readable warning stating that marijuana smoke contains carcinogens and may negatively affect health.

Applicant shall include in each package a patient package insert with information on the specific product dispensed clinical pharmacology, indications and use, dosage and administration, dosage forms and strengths, contraindications, warnings and precautions and adverse reactions.

10. Methods of Ensuring Compliance for Sanitation & Waste Disposal:

(A) Sanitation: Applicant's Standard Operating Procedures include industry best practices to ensure high quality, contaminant-free product is offered to medical patients. Sanitation and waste disposal guidance included in the Operating Procedures is outlined in a step-by-step format (SOPs) and have been developed to include best practices as outlined in Rule 64-4.207 and Food Safety Good Manufacturing Practices for the basic operational and environmental conditions required to produce safe foods. In accordance with 21 CFR, applicant operating plans include risk-based preventive controls for every phase of the organization and employees are trained during onboarding to execute a wide variety of sanitation and hygiene rules during each stage of the supply chain. Additionally, the Cultivation Team, Processing Team and each Dispensary will form

a Sanitation Committee. Each committee appoints a Team Leader, who is incentivized with cash bonuses for ensuring sanitation and hygiene protocols are met for its department. The Team Leader receives a bonus and is allocated a second bonus to issue to a team member each month, which incentivizes all staff to comply with sanitation and waste disposal operating principles. The Chief Operating Officer is responsible for SOP updates and will sign up electronically for FDA guidance updates and Department updates. Relevant guidance documents will be included in updated SOPs on a quarterly basis. AIB International will be retained by the board for bi-annual audits of Operating Procedures to ensure compliance with federal and state regulations.

(B) Waste disposal in accordance with Rule 64-4.207, F.A.C:

Securing Marijuana Waste: The Applicant will maintain a secure "Marijuana Waste" closet in each cultivation, processing and dispensary facility. Closets and containers will be clearly labeled as "Marijuana Waste" and secured with an **119.071(3)** control system. Disposing of

Marijuana Waste: Once the container is full, the marijuana waste will be rendered unusable and unrecognizable by mixing it with a substance such as coffee grounds, sawdust, or other non-toxic materials to a ratio of 70% compostable substance to 30% marijuana product.

Packaging Marijuana Waste: The waste mixture will be placed in a non-transparent, puncture resistant bag or container that is securely sealed and labeled as "Non-usable Marijuana Waste".

Marijuana Waste Disposal: The Applicant will transport the packaged marijuana waste mixture to a licensed medical waste incinerator or disposal facility authorized to receive marijuana waste where it will be disposed of in accordance with applicable state and federal regulations.

Record Keeping: The Applicant will maintain a current Marijuana Waste Log utilizing the **119.071(3)** seed-to-sale tracking system. All disposal records and documentation will be kept on file

for a minimum of three years and made available for inspection upon request by state or federal authorities.

11. Pre-roll Wrapping Paper: Raw unbleached white papers.

12. Edibles: Applicant will produce the following edibles in the proposed processing facility pending Department approval: Oral Lozenges, Ginger Chews, Baked Goods, & Chocolates. These edibles are in addition to other marijuana-oil based processed derivative products including Gel Capsules, Tinctures, Topical Cream, Sublingual-Spray, and Vaporizer Cartridges.

(A) Ability to obtain and comply with requirements for a food establishment permit: Applicant will undergo a plan review with the Department prior to applying for a food permit pursuant to this rule, Chapter 5K-11, F.A.C to evaluate whether proposed construction or remodeling plans conform to current requirements established in Ch. 500, F.S., including existing regulations. Applicant will request a plan review by submitting a completed Plan Review Application and any applicable fees. Applicant will have Food Permit Application complete for department review when the request is made. After incorporating Department guidance, Applicant will apply for a food permit with a completed Medical Marijuana Treatment Center Food Permit Application, applicable fees and provide to the Department a list of all Edibles the MMTC intends to produce or manufacture. After issuance of the permit, Applicant will adhere to renewal guidance and will notify the Department in writing of any changes or additions to food products to be produced. Chief Operating Officer and Post-Production Manager are accountable for ensuring operating protocols are updated in conjunction with department approved plans and ensure that SOPs create checks and balance to continue compliance with Chapter 500, F.S. and Chapter 5K-11, F.A.C.

(B) Control systems to regulate the milligrams of THC: After the Cannabis oil is extracted and homogenized, the derivative batch will undergo a round of testing analysis by a department

approved Certified Marijuana Testing Laboratory (“CMTL”). After determining levels of THC in the batch of oil from the CMTL report, the Postproduction Manager will determine the appropriate dilution level for the batch to maintain the required dosage in each single serving edible. Edibles will not contain more than 200 milligrams of THC, and a single serving portion of an edible will not exceed 10 milligrams of THC. After production is complete, the COO must sign off on the release of all finished products from quarantine to the dispensing facilities. COO will reference a checklist, confirming a wide variety of regulatory compliance, which includes a redundant check on the THC mg and potency of each edible product.

(C) Compliance with the requirements of the Department’s Standards for Production of Edibles

Rule: Applicant will maintain a valid permit to operate as a food establishment from the Department of Agriculture and Consumer Services. Before producing and dispensing edibles, Applicant will comply with the variance procedure in Rule 64-4.023, F.A.C., and obtain department approval of each edible. To maintain compliance with Standards for Production of Edibles, training and mandated checklists are required of all processing employees. All processing and production operations will adhere to the rule, limiting the shapes, forms, colors, decorations, and additives to those approved by the Department. All ingredients will be stored and transported in a sanitary manner in accordance with FDA guidelines. Each single serving will be clearly marked, bear a universal symbol, and will not bear a reasonable resemblance to commercially available candy. No meat, poultry, fish, or any additive that increases potency or toxicity will be used in processing or production. All edibles are shelf stable and can be safely stored and are packaged and labeled in accordance with regulations. In addition to the Post-Production Manager oversight to ensure compliance, redundant checks are performed by dispensary employees before any products are released from inventory.

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Subsection 4.5.2 – Processing Infrastructure

1. Proposed Processing Facilities: All processing will take place at the Applicant's 50-acre property located at 119.071(3). The property is owned by the Applicant and currently used for commercial hemp cultivation. There are five existing buildings on the property, formally used for agriculture processing. Building 3 will be used for post-production process 119.071(3)

119.071(3)



farm producing hemp

Building #3 on the attached floorplans is being retrofitted into the Applicant's Post-Production Center. In accordance with regulations processing operations will take place in an enclosed structure and in a room separate from other plants or products. All personnel and procedures will comply with the U.S. Food and Drug Administration's (FDA) Good Manufacturing Practices in manufacturing, packing, or holding human food, in addition to the Department's and State regulations. The 7,800 sq. ft. building will house:

- Shipping and Receiving: 120 sq. ft.
- Packaging Room: 400 sq. ft.
- Machine Trim Room: 400 sq. ft.
- Curing Room: 400 sq. ft.
- Vault: 400 sq. ft.
- Drying Room: 1,664 sq. ft.
- Security Closet: 40 sq. ft.
- Office 1: 100 sq. ft.
- Office 2: 100 sq. ft.
- Employee Breakroom: 108 sq. ft.

- Men's Locker Room: 108 sq. ft.
- Women's Locker Room: 108 sq. ft.
- Clean Room: 405 sq. ft.
- Pre-Extraction Room: 200 sq. ft.
- Extraction Room: 200 sq. ft.
- Post-Extraction Room: 300 sq. ft.
- Kitchen: 700 sq. ft.

3. Extraction and Concentration Equipment and Location: Dried finished flower is moved from the vault to the machine trim room when the extraction process begins. The machine trim contains the following equipment:

- EzTrim Bud Bucker: Removes buds and leaves from stem. Can process 11 lbs. an hour of wet material and 5 lbs. an hour of dry material.
- EzTrim Bud Sorter: Sorts the cannabis material in an efficient, accurate and safe way. Can process 22lbs of flower in an hour.
- Trinator XL Dry Trimming Machine: Trims excess material off the buds and can process 60lbs per hour.
- King Shred Grinder Machine: Can grind 1 lb. of cannabis flower 2 minutes.

After flower has been trimmed and ground, the batch is moved into the Extraction Room, which includes:

- MRX Supercritical Carbon Dioxide (CO₂) Extraction Machine.
- The FlackTek Dual Asymmetric Centrifugal (DAC) SpeedMixer

After finished Cannabis Oil is produced in the Extraction Room, batches are held in quarantine until they pass testing with a CMTL. After passing testing, Cannabis Oil is refined into products in the refinement room. The refinement room contains:

- SaintyCo DM-20 Gummy Depositing Machine: Liquid product formulations are filled into silicon molds to produce oral lozenges, Ginger Chews and Gummies.

- SaintyCo Tabletop Chocolate Depositor: Cannabis extract is infused with fat soluble liquid that will be used in the recipe of the baked goods such as butter. The chocolate liquid is then precision filled into chocolate molds to produce infused chocolate.
- ATG Capsule Filling Machine: Cannabis extract is mixed with tapioca maltodextrin and precision filled to produce gel capsules.
- ATG Bottle Filling Machine: Cannabis extract is mixed with MCT oil and precision filled to produce infused tinctures.
- CECLE Semi-Auto Paste Filling Machine: Cannabis extract is mixed emulsified shea butter into the topical cream recipe. The cream is then filled using a Liquid & Paste Filling Machine to produce infused topical creams.
- ATG Pharma Cartridge Filling Machine, ATG Pharma Cartridge Filling Machine: Cannabis oil is filled and capped in ceramic cartridges for vaporizer cartridges.
- Mini Rocketbox Filling Machine: Ground Cannabis flower fills precise 1-gram pre-rolls.
- Cooking Performance Deep Depth Natural Gas Convection Oven (60,000 BTU): Cannabis extract is infused with fat soluble liquids to create baked goods.
- Avantco A-49R-HC 54" Solid Door Reach-In Refrigerator

4. Analytical Equipment, Including Separators & Detectors, & Location: In addition to working with Department approved Certified Marijuana Testing Laboratories, applicant will purchase The Shimadzu HPLC Potency Tester, which will be located in the Extraction room. Having on site testing available to the Applicant will allow for additional quality assurance protocols during various stages in processing and for in-house stability testing during inventory audits.

5. Safety Equipment, Facilities, & Location: To meet the standards set by 64ER21-13, Applicant will perform Carbon Dioxide Solvent-Based Extraction in a closed loop system. All pressure vessel within the system will have a be rated for at least 125% of the maximum pressure, as specified in the manufacturer's documentation, not to exceed 10,000 psi. All pressure vessels will contain an emergency pressure release system vented to the outside of the facility. The closed loop system will be certifiable as commercially manufactured, safe for its intended use, and built to codes of recognized and generally accepted good engineering practices. All pressure vessels will comply with section VIII, division 1 of the ASME BPVC and with NFPA 1, section 38.6.4 (2021). The extraction room will be fitted with NFPA approved Beacon 200 fixed gas detection system and listed CO₂ detectors set to alarm at 5000 ppm of CO₂. The storage, handling, and disposal of carbon dioxide solvents will comply with NFPA 55.

The Director of Security and Safety will be responsible for ensuring that the closed loop CO₂ extraction/distillation systems are not altered, and all maintenance is performed in accordance with manufacturer's guidance. In the event the closed loop system requires alterations, such alterations will be performed by the manufacturer, or licensed individuals approved by the manufacturer. Any alterations will be inspected by an independent engineer to ensure that the alterations are built to codes of recognized and generally adapted good engineering practices. The independent engineer will provide a signature and seal, the serial number of the closed loop system being certificated, to include the Applicant's name. Applicants will prominently display proof of the certification inside and outside the immediate extraction area. Systems will not be placed back into service until such inspections are completed and signed off.

Applicant will retain the services of an independent engineer to conduct quarterly preventative maintenance checks and inspections on all closed loop processing equipment to ensure the safe

operations. The Director of Security and Safety will be responsible for contracting and scheduling these services. A preventative maintenance check and inspection log will be maintained for each piece of extraction equipment by the Director of Processing. The Director of Security and Safety will conduct monthly audits of all logs.

Throughout the processing facility Applicant will install eyewash stations and chemical showers. Chemical spill kits will be in all areas where chemicals are used. All chemicals will be stored in their appropriate containers and storage cabinets in accordance with OSHA guidance. The processing facility will have a safety wall maintained by the Director of Security and Safety. SDS binders will be prominently displayed on the safety wall. A Class B first aid kit will be fastened to the safety wall for ease of access.

6. Access to Sufficient Potable Water & Hot Water: The proposed site location has a current active wells providing potable water to the facilities. Applicant will install new hot water tanks and reverse osmosis filtration systems for all potable water locations. Applicants will conduct an annual well water test, as well as monthly preventative maintenance checks and inspections on all hot water heaters and water filtration systems. The Director of Facilities will maintain a potable and hot water service log for each facility.

7. Odor Mitigation: The facility's mechanical air quality design will incorporate activated HEPA and activated charcoal filters for exhaust air serving all rooms in the facility. This will limit airborne contaminants such as dust, pollen, mold spores and any odor from Medical Cannabis. The rooms will be outfitted with air scrubbers and a filtration system to mitigate contaminants. The facility's non-porous construction materials will include a specialty coating that blocks odor permeation. A UV air purifier will be installed in the duct work to improve indoor air quality by

destroying odor-causing and potentially toxic volatile organic compounds (VOCs), while sterilizing mold, bacteria, viruses, and allergens from the air stream.

9. Processing Systems (e.g., Data Collection, Power, Packaging & Labeling): Applicant will

use 119.071(3) seed-to-sale software to track all steps of the Cannabis processing system. In conjunction with 119.071(3) entries, the Processing Manager will be responsible for inputting all Cannabis and related biproduct inputs and outputs on secondary electronic log. Additionally, all setpoints and processing notes will be recorded on the electronic log with each batch.

Applicant has purchased an Epson Colorworks label printer for all compliance label printing. Applicant has purchased sustainable, home compostable packaging for pre-rolls, packed flower, and vape cartridges from DAMA Packaging. Applicant current has over 30,000 units of each forementioned packaging in storage at Applicants Rhode Island warehouse. Edible packaging will be purchased from MSN Packaging. Applicant has purchased 10,000 units of edible packaging from MSN which is currently stored at Applicants Rhode Island warehouse. All packaging has been certified by a third-party to be child resistant and will be designed in accordance with applicable state and federal laws and regulations. Applicant will conduct monthly data analysis on packaging burn rates. Applicant will utilize packaging burn rates to ensure 3 months of packaging is warehouse on the proposed property.

10. Computer Systems & Software: Applicant will utilize 119.071(3)

to manage all Cannabis inventory. Dedicated mobile compliance computers will be located in each facility. Managers will be able to access 119.071(3) from each compliance computer in order to conduct regularly schedule inventory audits, print cannabis product tracking tags, and make appropriate adjustments. All Applicant employees will undergo training to ensure proficiency with the use and implementation of 119.071(3), to

include but not limited to, logging new plants, adjusting for destroyed plants, converting plant categories as it progresses through the cultivation and processing process, generating plant and cannabis material tags, and all other applicable functions.

11. Ventilation & Exhaust System(s): Applicant will retain a professional mechanical engineer licensed in the State of Florida. A fresh air makeup and exhaust system will be designed in accordance with the applicable International Mechanical Code, as well as local and state building codes. All rooms where CO2 is in use will be designed with a Beacon 200 control for fixed gas detection system. The Beacon 200 system will include but is not limited to the installation of CO2 and O2 sensors, relays to control fresh air and exhaust functions; notification system to include strobe, horns, and mobile phone notification to the Director of Processing and Director of Security and Safety.

12. Back-up Plans for All Identified Systems: Applicant will utilize a Genetac natural gas generator to provide power to all systems identified, including security systems and perimeter lighting in the event of power failure. A natural gas generator provides applicant with the ability to maintain power indefinitely. In the event of power failure, the Genetec security software will detect that the system is on backup power and will send an electronic notification to the third-party monitoring service. The Department will be notified.

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Subsection 4.5.3 – Ability to Secure Processing Infrastructure

1. Infrastructure that the Applicant has Secured as of the Date of Submission

Applicant owns a 50-acre property in 119.071(3) Postproduction building is existing.

2. Infrastructure Applicant Has Not Yet Secured and Timeline and Schedule

The following is a list of equipment to be purchased directly from the manufacturer after the Department announces that the Applicant has been selected to operate the proposed facility. Each of these manufacturers has been contacted while the Applicant vetted options for its proposed systems. All lead times vary between 3-6 weeks and has been included in the schedule outlined in the Business Plan to ensure Applicant requests Processing Authorization within 120 days.

Equipment to be purchased directly from the manufacturer includes:

- MRX Supercritical Carbon Dioxide (CO₂) Extraction Machine
- SaintyCo DM-20 Gummy Depositing Machine
- SaintyCo Tabletop Chocolate Depositor
- ATG Capsule Filling Machine
- ATG Bottle Filling Machine
- ATG Pharma Cartridge Filling Machine
- ATG Pharma Cartridge Filling Machine
- Root Sciences Panther Nano Emulsifier
- STM Mini Rocketbox Filling Machine
- EzTrim Bud Bucker
- EzTrim Bud Sorter
- Trinator XL Dry Trimming Machine
- The FlackTek Dual Asymmetric Centrifugal (DAC) SpeedMixer

The following equipment will be ordered through a 3rd party distributor:

- CECLE Semi-Auto Paste Filling Machine (toolots.com)
- Cooking Performance Deep Depth Natural Gas Convection Oven (websturaunt.com)
- Avantco A-49R-HC 54" Solid Door Reach-In Refrigerator (websturaunt.com)
- King Shred Grinder Machine (trimleaf.com)

3. Timeframe for Obtaining Processing Authorization: The Applicant is fully capitalized, experienced, and prepared to execute the proposed plan swiftly and on budget. Prior to engaging in any solvent based extraction, Applicant will obtain Department authorization. To do so, Applicant will complete the following tasks and secure documentation verifying as much to be submitted to the Department with Form DH8026 "Request for Solvent-Based Extraction":

- Complete retrofitting of processing facility to the standards of Food Safety Good Manufacturing Practices & develop a clear plan to have facility certified as such within one year of operations.
- Complete assembly of a closed loop superfluid carbon dioxide extraction system.
- Produce a detailed floor plan identifying the location of the extraction system.
- Obtain Certification from an Independent Engineer that the system is in compliance with the design and safety requirements of 64ER21-13(8)
- Pass an inspection with the Live Oak Fire Department. Applicant will also establish a regular inspection routine with the Fire Department on a minimum basis of biennial re-inspection.
- Finalize and adopt Standard Operating Procedures for processing work and the operation of the superfluid carbon dioxide extraction system.

- Finalize Employee Training Plan related to processing work, including the use of the superfluid carbon dioxide extraction system.

To illustrate the assumptions in the timeline, the Applicant will complete the following steps to implement the proposed MMTC business upon licensure by the Department:

April 1 – May 15: Pre-licensure Steps: While the commission is evaluating applications, applicant is moving forward with Miguel Porras with FOR architecture co. in Miami, who will manage the development of a permit set of construction documents that will be used for contractor bidding and local permitting. Applicant is working with the municipality to receive permitting approval to commence construction immediately upon licensure.

Day 1 – 45 Post-licensure: Propagation Center: With plans and permitting complete, Applicant will prioritize Building #1, a 1,700 sq. ft existing building on the property which is to be used as the Propagation Center. The Propagation Center houses the Mother and Clone Rooms, with ample space to cultivate enough clones to service all flower trays outlined in the proposed facility. The rough-in construction will commence immediately following licensure with the priorities of work being framing, electrical, plumbing, HVAC, and security system. After inspections, Applicant will close walls, epoxy floors, and start the finish work for electric, plumbing, HVAC and irrigation. Mother and clone lights install will then occur. Local inspections will take 1 week, and Applicant will be issued a certificate of occupancy for Building #1. Applicant will then notify the Office of Medical Marijuana Use and submit a Request for Cultivation Authorization.

Day 1 – 60 Post-licensure: Veg, Flower and Post-production Buildings: In parallel with the finishing of the Propagation Center outlined above, construction trades will start framing and rough-ins for electric, HVAC, and plumbing on additional buildings including the Postproduction Center. After initial inspections, the floor is epoxied, walls are insulated and treated with FDA

approved wall paneling, and trades begin the finishing work such as duct work installation, bathroom fixtures, ceilings, air filtration systems, electrical outlets, and security systems. Additionally, veg and flower lights, HVAC, mobile racks, irrigation system, and environmental control systems are ordered the first week following licensure.

Day 60 – 74 Post-licensure: Equipment Install: Specialty equipment and final irrigation components are installed in Building #2, Building #3 and Building #4. All processing and manufacturing equipment will be installed in building #3, the Postproduction Center. On day 74, Applicant will submit a Request for Authorization for Processing activities along with a request for inspections from the Office of Medical Marijuana Use.

4. Assumptions Used In Processing Authorization Timeframe.

- Applicant assumes plans will be complete in a 30-day window.
- Applicant assumes construction permits will be issued within a 90-day window.



119.071(3)

Existing Building on Applicant's Farm to be used as Postproduction Center

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Suwannee County

224 Pine Avenue Live Oak, FL 32064

Phone: 386-364-3401

Fax: 386-364-3754

April 24, 2023

Re: Medical Marijuana on 119.071(3) 26-03S-11E-11838-001002

To Whom It May Concern,

Please be advised that the above-mentioned property is located in an Agriculture-1 zoning district which allows for a variety of agriculture uses including cultivation of crops and processing, storage, and sale of agriculture products and commodities. I am writing to confirm that the cultivation of cannabis in compliance with state regulations is an approved use on Alamanda Farms' proposed cultivation site located at 119.071(3)

119.071(3) The cultivation of cannabis is only permissible once Alamanda Farms has obtained final state licensure and all required regulatory approvals from the State of Florida.

Should you have any further questions, please contact me at [REDACTED]

Sincerely,

Ron Meeks

Development Services Director

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Section 4.6

Plan for Dispensing Marijuana and Supporting Infrastructure

Subsection 4.6.1 – Dispensing Plan

1. Product Offerings: Applicant's cultivation and processing teams have spent years at state licensed marijuana facilities perfecting a variety of refined terpene blends and cannabinoid profile variations for each strain. Applicant is therefore able to offer patients an array of products and formulations with distinct characteristics and benefits. Applicant's product offerings will afford every patient the opportunity to find a form of treatment uniquely suited to their individual needs by offering a wide variety of products in a way that simplifies the patient's decision. There will be 4 classes of products that represent different intensity levels, ranging from low-cannabinoid to high-cannabinoid concentration. Each class will be offered in 4 different terpene dominant varieties, including Pinene, Limonene, Linalool, & Myrcene, resulting in 16 SKUs for each product type. The product types for launch will include (1) *Oral Lozenges*: Sucking candies for patients who don't want to smoke (2) *Gel Capsules*: Pills for patients who don't want to smoke (3) *Tinctures*: Medical grade sublingual drops (4) *Popsicles*: A soothing option for patients dealing with pain or managing nausea (5) *Ginger Chews*: A refreshing and low-calorie gummy with all natural ingredients (6) *Topical Creams*: Great for localized pain management and inflammation (7) *Baked Goods*: Comforting baked goods that provide a familiar way to consume (8) *Chocolates*: Low sugar, organic cocoa treats (9) *Sublingual-sprays*: A quick, discreet option for patients who need relief on the go (10) *Vaporizer Cartridges*: Small serving of refined cannabinoid oil, stored in industry standard 510-thread cartridge housings which can be used in common medical inhalation delivery devices (11) *Pre-rolls*: Pre-rolled marijuana cigarettes provide a more convenient way to consume flower (12) *Flowers*: 13 different strains as outlined in 4.4.1, including 2 low-THC options. Applicant will introduce new, flavonoid and terpene ratios over time to increase SKUs based on patient needs. All new product offerings will be submitted for Department

review and approval in accordance with Department variance request procedures and Rule 64-4.023. Applicant will also carry a wide variety of delivery devices, with an appearance consistent with medical use including:

- Vaporizers & Cartridges: Inhalation device which heats marijuana oil in cartridges into a breathable vapor. Applicant will carry vaporizers & cartridges from Pax, Tronian and Milatron.
- Water Pipe: Water in the chamber helps filter and cool smoke to provide a smoother, easier, more comfortable inhalation experience. Applicant will carry chamber bong, straight tube bong, matrix percolator bong and recycler pipes made by Grav Labs and Luv Buds.
- Smoking Pipe: Small device that contains a bowl-shaped component where smokable material is placed. Applicant will carry glass bowls made by Luv Buds and SAFA Goods.
- Marijuana Cigarette Accessories: Applicant will carry rolling papers and rolling trays made by Elements and Blazy Susan. Rolling papers will not be made with either tobacco or hemp.
- Marijuana Grinder: Small accessory that grinds usable whole flower. Applicant will carry grinders Cali Crusher, LuvBuds, Titan Crusher.

2. Maintaining Adequate Supply at Each Dispensing Facility: The Applicant is launching with 6 medical dispensaries, strategically located to increase access for patients in need. As of March 31, 2023, there were 804,066 Qualified Patients registered in Florida's Medical Marijuana program. Applicant's market analysis assesses a current market size of \$1,447,318,800, with the average patient spending \$1,800 annually on medical products and devices. Also as of March 31, 2023, there were 551 active MMTC dispensing locations serving patients statewide. Assuming an even distribution of patients across dispensing locations, the average MMTC dispensing location conducts \$2,626,713 in sales of medical marijuana and low-THC marijuana annually. Using models Applicant has built based on real world data from other medical markets, Applicant

projects that each dispensary requires the production of approximately 476 lb. of dried marijuana flower. The applicant is proposing 6 dispensaries for launch, which would require the production of 2,856 lb. of dried marijuana flower. Applicant's proposed cultivation facility will launch with 300 flower trays housed in Building #2. Each tray will produce 5 lbs. of dried marijuana product per harvest and will be harvested an average of 5.79 times per year, yielding 8,685 lbs. of dry flower annually, with an additional 3,474 lbs. of trim biomass for extraction and processing operations. Additionally, Applicant has the capacity to convert Building #4 into an additional 225 flowering trays, producing an additional 6,513 lbs. annually, if required by patient demand. This means Applicant will be able to produce enough flower to service 27 dispensaries at max capacity, giving the Applicant the opportunity to increase access based on the needs of medical patients in Florida.

3. Hours of Operation: Each dispensing location will operate from 10:00 AM – 7:00 PM and will be open seven days a week. The facility will only close on Christmas Day and New Year's Day.

4. Product Delivery: Applicant will offer home delivery of online orders to eligible patients and caregivers pending Department approval. Delivery will be offered to medical patients only during hours of operation. Deliveries will be made the following day after an order is placed to give staff time to properly stock product, log the inventory tracking system, and allow for transportation team to randomize routes. Applicant will purchase common, unmarked vehicles to be used strictly for transportation operations of medical marijuana with current commercial automobile liability insurance in the amount of one million dollars per incident. Marijuana, derivative products, and delivery devices will be kept in in a locked compartment of the vehicle separate from the primary passenger cabin. Two employees will conduct each delivery; one employee will always remain in the locked vehicle. The vehicle will be equipped with a video surveillance system with coverage

of the exterior front and rear, interior cargo bay and driver's compartment. Video footage will be stored both in the vehicle and streamed back to the Facility and stored on site. Applicant will not transport under conditions which may render edible products to be deemed adulterated, as provided in Section 500.10, F.S. Applicant will maintain a transportation manifest generated from 119.071(3) in each delivery vehicle. The manifest will record the time and date of the vehicles departure from the dispensing location, identifying information for the dispensing location from which the vehicle departs, the license plate number of the delivery vehicle along with the vehicle's make and model, the name and address of the delivery recipient, the quantity and product type of all marijuana or delivery devices being transported, the date and time the vehicles arrives at recipients address, and the names and signatures of the two employees present in the vehicle for each trip. All applicant facilities will retain access to the transportation manifest and both the operators of the delivery vehicles and responsible party distributing or receiving regulated items or material at an Applicant facility with sign the manifest at every point of exchange. Applicant will maintain records of the transportation manifest for a minimum period of three years. Applicant will request Department authorization before any delivery operations commence in accordance with regulations. After obtaining Department approval to execute delivery operations, Applicant will actively maintain a website which will provide patients and caregivers with both information and the ability to place home delivery orders. Applicant will place the website under Department review and await approval before making the website publicly accessible and before offering online ordering through the website. Access to the website will be controlled by an age-gate. In accordance with section 381.986(i) F.S, Applicant will make the following information available to access on the website (1) Each marijuana and low-THC product available (2) The form, strain, THC content, CBD content, ratio of CBD to THC content, dose unit, and total number of doses available for

each product (3) The price for a 30-day, 50-day, and 70-day supply (4) The price for each marijuana delivery device listed as available (5) All current discount policies along with eligibility criteria for each discount.

5. Patient Education: Each new patient will undergo an immersion session with the Medical Director (“*MD*”), in person or via tele-medicine conference. The *MD* will affirm the registration and their prescribing physician’s certification in the Medical Marijuana Use Registry. Once the patient’s eligibility is confirmed, the *MD* will go through a detailed assessment of the patient’s symptoms and discuss the treatment options available. The *MD* will assist the patient in determining which product and means of administration may best suit both the patients’ medical needs and personal comfort. The *MD* will advise each patient on how to safely ingest the marijuana products. Patients will be provided with literature reinforcing the information discussed during the immersion session and outlining the various cannabinoids and terpenes found in medical marijuana. Patients will also be provided with a reference sheet listing studies that the *MD* determines to be informative and instructive, a symptom rating scale for patients to self-assess, and a survey about the patient’s previous use and comfort level with marijuana. Additional educational materials provided to each new patient include guides for the safe use, legal use and safe storage of medical marijuana in addition to an information sheet about what the patient should do in case of accident ingestion or an adverse reaction. At the conclusion of the immersion session, each new patient will sign an acknowledgement which includes information and warnings regarding the use of marijuana specified by the Board of Medicine and the Board of Osteopathic Medicine. In addition to the verbal consultation and educational materials provided during a patient’s immersion session, all dispensing location patient technicians are trained to understand the full scope of information covered by those materials and will be available to consult with

patients about product offerings and use of medical marijuana and low-THC marijuana any time a patient visits. Patient technicians are trained monthly on updates in the field of medical marijuana and kept aware of all advancements in marijuana science and medicine.

6. Patient Confidentiality: Applicant understands that patient confidentiality is a critical element of providing compassionate and effective medical care. All employees will be trained during onboarding to maintain privacy of personal identifying information in accordance with HIPAA Compliancy, which includes name, social security number, email address, address, date of birth, photograph, telephone number and any information on the patient's ailments or purchases. All personal information will be recorded on the secure website prior to arrival. Prior to collecting personal identifying information, applicant will obtain express consent from the patient or caregiver. The applicant will ensure that personal identifying information remains confidential by securing the user interface of the website using Hypertext Transfer Protocol Security to ensure that the data transfer between the user and server is secured with Transport Level Security Protocol and Secure Socket Layer Cryptographic Protocol. Applicant will use an anti-virus system to prevent software intrusions on the servers which will be updated regularly. A firewall will be used that employs network monitoring and intrusion detection systems at the server level and that deploys intrusion prevention systems. The system will authenticate all website users who access website and will assign access privileges based on each user's specific permissions. The ability to access information on the website will be limited to the scope of the user's specific permission level. Applicant servers will be housed in a secure location which will be Standards for Attestation Engagements System and Organization Controls Type III certified. The applicant will maintain records of all system access and will be made available within 48 hours of the Department's request. Upon becoming aware of any data breach that includes personal identifying information,

applicant will immediately notify patients and caregivers affected, or potentially affected, by the breach and submit a written corrective action plan to the department within seven days of the incident.

7. Patient Complaints & Adverse Incident Reports: Inspired by FDA recommendations for controlled substance manufacturers, applicant will provide a toll-free number of which patients and caregivers may use to report complaints or adverse events. The system will automatically route calls to the facility phone line during normal business hours and will route to the Medical Director after hours. All employees are responsible for documenting any complaint received in the Complaint Log. The employee receiving the complaint must notify the Medical Director and Director of Security and Safety (DSS) immediately. Complaints connected to reports of adverse patient reactions require recordkeeping in the Adverse Events Log. The Medical Director must respond to any product related complaint within twelve hours to gather information about the nature of the complaint, the affected parties, or products, and determine the appropriate steps for resolution. All employees shall be notified, and an adverse event investigation will proceed immediately. The Medical Director will then use the World Health Organization - Uppsala Monitoring Center causality assessment system to estimate whether it is likely that there is a causal relationship between the adverse event and the medical marijuana. Events found to have a causal relationship will immediately trigger recall protocols, which incorporate FDA and Department procedures, including direct communication of the recall to all affected qualified patients and caregivers and a press release. The press release will be published in a publication of general circulation in the geographical area in which the recalled edibles were dispensed and on the Applicant's website.

8. Medical Marijuana Use Registry: Every time a patient or approved caregiver arrives at a dispensing location, they will be required to present a Medical Marijuana Use Registry (MMUR) identification card and one other form of identification to reception staff. The reception desk staff member will confirm the card is valid and active and that the photo and name on both forms of identification matches the individual. After check-in, authorized employees under supervision of the Medical Director will perform a redundant check and confirm in the Registry the contents of the physician certification, verify the authorization of a qualified patient or a caregiver to possess marijuana or a marijuana delivery device and identify how much product can be purchase before the patient reaches his/her supply per the physician certification or Departmental rules on dosages and supply limits. For online purchase, patients or caregivers must be logged into their personalized portal, where a current valid identification card must be on file. Before accepting an order, an authorized employee will cross check the identification card is still valid and confirm the validity of the order based on the patient's information in the Registry.

9. Tracking Dispensation of Marijuana: After first confirming the patient's identity and active status, but before any regulated product will be dispensed, a staff member must verify in the registry that the order presented matches the order contents as recorded by the prescribing physician, verify the physician certification, and confirm that the order has not already been dispensed. Staff must also confirm that the order does not place the patient over the permitted daily, 35-day or 70-day dosing and supply limits. The impact of each purchase on all dispensing limits will be assessed by cross-referencing previous dispensation totals of both grams of marijuana in smokeable form and milligrams of THC through all derivative products within each dosing limit window. Staff will conduct this review based on dispensing data found on the patient's profile in the MMUR registry, but Applicant will also retain the same data in the point-of-sale

system. All sales are logged in the point of sale and 119.071(3) seed-to-sale systems. Applicant will retain a record of the point of sale for each tracked final product to facilitate recall or other adverse incident response actions if necessary. Every two weeks, the Dispensary Manager on site will reconcile each patient's portal, cross checking supply limits with purchases to date and update notes accordingly. If patients are near their supply limit, the Medical Director will reach out to the patient and notify them.

10. Dispensing in accordance with section 381.986(8)(e)16., F.S: To ensure regulatory compliance, applicant administers a rigorous staff onboarding process using a module-based approach. Each segment of operations are presented by key management. After each module, staff are provided a quiz where they must score a 90% or above before beginning work at the facility. Regulatory update training is provided every month by the Medical Director to ensure employees maintain compliance, who will oversee all operations of the dispensary facility. In addition to supportive training and watchful managements, dispensing location staff will be regularly assessed on imperative compliance-related requirements throughout employment. Staff will be required to re-enter the training process and be fully re-evaluated if they fail to maintain command of the Registry checks, dosing checks, logging sales, and confidential record protocols as outlined in section 9 above. Additional SOPs in applicant's operating plan includes protocols to mitigate unauthorized transfer of marijuana, ID cards, drug, and alcohol-free workplace, opening and closing checklists, sales and dispensing SOPs, cash management, HIPAA, packaging and labeling, taxes and sales and using a medical tone.

11. Complying with Standards for Production of Edibles Rule: After receiving Processing Authorization, but before engaging in any processing or production operations, Applicant will provide the department with a copy of a current valid permit to operate as a food establishment

from the Department of Agriculture and Consumer Services and provide the Department with documentation from a nationally accredited certifying body that the Applicant's processing facility has passed a Food Safety Good Manufacturing Practices inspection. Before producing and dispensing edibles, Applicant will comply with the variance procedure in Rule 64-4.023, F.A.C., and obtain department approval of each edible. To maintain compliance with the rule, training and mandated checklists are used to in both the processing and dispensing segments of the business. Applicant will not sell or make available for sale any edible derivative product containing any coloring additive, meat, poultry, fish, recognizable commercially manufactured food product, alcohol, nicotine, caffeine, or any additive that increases the products potency or toxicity. Applicant will not sell any edible which resembles a commercially available candy product, is decorated with icing, sprinkles or similar toppings, or is a bright or primary color. All ingredients will be stored and transported in a sanitary manner in accordance with FDA guidelines. Each single serving will be clearly marked, bear a universal symbol and will not bear a reasonable resemblance to commercially available candy. During weekly inventory audits, Inventory Managers at each dispensary will perform edible audits. Inventory Managers will use the Edible Production Checklist during the audit, which includes confirmation that All edibles were produced in the Applicant's department-approved processing facility. All edibles are shelf stable and can be safely stored. Inventory Managers will confirm that products are packaged and labeled appropriately, meet THC limitations, and that the expiration date has not passed for each product. Inventory Managers will be trained and responsible to ensure a first in, first out system to ensure the oldest product is dispensed prior to newer products. All Edibles on display will be contained in a secure, locked case and dispensaries will not dispense any other food or beverages to its customers.

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Subsection 4.6.2 – Dispensing Infrastructure

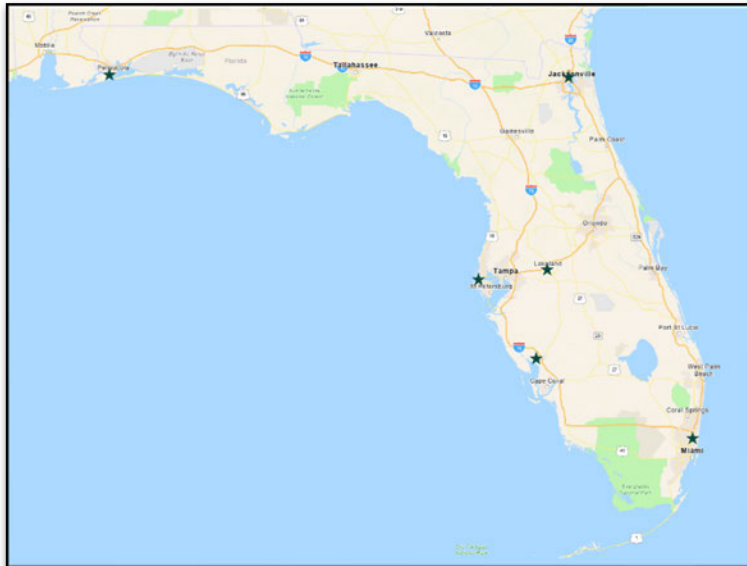
119.071(3)



1. Proposed Dispensing Facilities: Applicant will operate the following six Dispensing Locations (“DL”) situated across Florida:

1. Broward County: 4614 Hollywood Blvd Hollywood, FL 33021
2. Charlotte County: 22091 Elmira Blvd Port Charlotte, FL 33952
3. Duval County: 2058 Edgewood Ave W Jacksonville, FL 32208
4. Escambia County: 3800 W Navy Blvd Pensacola, FL 34239
5. Pinellas County: 1600 N Missouri Ave Units 140 & 150, Largo, FL 33770
6. Polk County: 833 Massachusetts Ave N Unit 1501, Lakeland FL 33901

Staffing and inventory plans for each DL are designed to ensure each location can care for the core patient population within each DL’s Primary Service Area (PSA). A PSA is defined as all points within a 30-minute driving distance of the DL at normal road conditions. While



Applicant is proud to provide care to any MMUR-registered patient, the increased accessibility to high-quality care Applicant offers Florida’s Medical Marijuana Patients will be most impactful for PSA residents.

In the summary of Applicant’s proposed dispensing locations found below, PSA total population figures were established through demographic analysis of U.S. Census Bureau and Florida Department of Health data. The demographic insights, with additional geospatial and economic

datapoints and industry insights, were included in Geographic Information System (GIS) analysis using 119.071(3) software to establish a detailed demographic profile of precisely defined PSA geographies for each proposed location. OMMU-published statistics on Florida's Medical Marijuana program & industry were then applied to model an estimated patient population within each PSA consistent with statewide and localized MMUR patient registration patterns.

2. Expanding Access

Applicant's combined network of dispensary location PSAs, shown to the right, is home to 3,999,128 Floridians, including 146,737 registered medical marijuana patients. Within that combined area, there are currently 84 MMTC dispensing locations. As such, in Applicant's proposed primary service area, there are currently 1,746 registered patients for every 1 dispensing location. Based on OMMU's most recent weekly update published April 14, 2023, there are 807,428 registered patients and 559 dispensing locations, or just 1,444 patients per dispensing location. Applicant's PSA therefore offers expanded access to care in populations underserved by current MMTC operators by 19% compared to the average patient.

3. Accessibility

Dispensing Location #1: 4614 Hollywood Blvd Hollywood, FL 33021

PSA Total Population: 2,265,094

PSA Patient Population Estimate: 83,112

This 2,030 SF facility is free-standing and most recently used as a medical office. With four exam rooms, reception & waiting areas, two private offices, and two restrooms, the layout allows for a simple retrofit to meet the requirements of a secure and efficient dispensing location.

Vehicular access is accessible to locals traveling east-west via Hollywood Blvd or north-south via 46th Ave, 48th Ave, and 56th Ave. Via Hollywood Blvd, I-95 lies 1.4 miles east, I-75 lies 9.3 miles west, and Florida's Turnpike is accessible 1.4 miles west of the property.

Public Transportation is available via Broward County Transit bus service, with direct access to Route 7. The Hollywood Station of the RTA Tri-Rail commuter rail service is 1.5 miles east.

Dispensing Location #2: 22091 Elmira Blvd Port Charlotte, FL 33952

PSA Total Population: 114,243

PSA Patient Population Estimate: 5,293

This 2,045 SF property, formerly a medical office, is free-standing and features a private parking lot. With waiting & reception areas, private exam rooms, and office spaces, the property is well suited for conversion into a dispensing location. The property is less than 1,000 feet from US Highway 41, providing significant access to patients transiting north or south. Accessibility is enhanced by I-75, located 3.7 miles northeast.

Dispensing Location #3: 2058 Edgewood Ave W Jacksonville, FL 32208

PSA Total Population: 563,067

PSA Patient Population Estimate: 20,660

This 1,800 SF facility is a free-standing structure with 150 feet of frontage along Edgewood Ave and includes a private parking lot. The facility sits 1.5 blocks away from the intersection of Moncrief Rd, which is highly trafficked with an average of 17,000 vehicles driving by daily. Primary vehicular access from the west is provided via I-95, 1.2 miles away. US-1, 1.9 miles away, is the primary access point from the east. Public transportation in Jacksonville is provided by JTA. Three bus routes have stops within 1,000 feet of the office, Routes 3, 32, and 51.

Dispensing Location #4: 3800 W Navy Blvd Pensacola, FL 34239

PSA Total Population: 242,414

PSA Patient Population Estimate: 8,895

This 3,577 SF property includes a private parking lot for up to 15 vehicles. Primary vehicular access is provided via US 98 (W Navy Blvd) and N New Warrington Road. Access to Interstate 110 is 3.2 miles away via US-98. Direct public transit access is available via Escambia County Area Transit through two bus routes. Stops on Routes 57 & 58 in both directions of travel along US-98 are within 200 feet of the property.

Dispensing Location #5: 1600 N Missouri Ave Units 140 & 150, Largo, FL 33770

PSA Total Population: 512,615

PSA Patient Population Estimate: 18,809

This 2,315 SF facility occupies two adjoining units located at the end of a shopping center featuring a shared 375-space parking lot fronting N Missouri Ave, which serves as the primary access route to the property. The facility is served directly by Route 18 of the PSTA Sunrunner Transit System with additional nearby stops along Routes 52/52LX, 61, and 73.

Dispensing Location #6: 833 Massachusetts Ave N Unit 1501, Lakeland FL 33901

PSA Total Population: 271,695

PSA Patient Population Estimate: 9,969

This 2,837 SF facility is a free-standing structure with private parking for 18 cars with primary vehicular access provided via US 98 (Bartow Rd/N Florida Ave), US 92 (Memorial Blvd). Access to I-4 is 4 miles away via US 98. Direct access via public transit is available via the Polk County Citrus Connection Pink Line, with nearby stops on the Green, Orange, Purple, and Gold Lines.

3. Computer network systems and Confidentiality: Applicant will train each employee during onboarding to maintain privacy of personal identifying information in accordance with HIPAA Compliancy, which includes name, social security number, email address, address, date of birth, photograph, telephone number and any information on the patients' ailments or purchases. Each

employee will receive biannual HIPAA training to stay up to date on best practices. All personal information will be recorded on the secure website portal prior to arrival. The applicant will ensure that personal identifying information obtained on the website remains confidential. To ensure all personal identifying information remains confidential, the applicant will secure the user interface of the website using Hypertext Transfer Protocol Security (HTTPS) to ensure that the data transfer between the user and server is secured with [REDACTED] 119.071(3)

[REDACTED] Applicant will use an anti-virus system to prevent software intrusions on the servers which will be updated regularly. A firewall will be used that employs network monitoring and intrusion detection systems at the server level and that deploys intrusion prevention systems. The system will authenticate all website users who access website purchasing information and will assign access privileges based on each user's specific permissions. The ability to access information on the website will be limited to the scope of the user's specific permission level. Privilege levels for employees will be reevaluated by the Medical Director every three months to ensure appropriate access. Applicant servers will be housed in a secure location, which may include a data center. Such secured location will be Standards for Attestation Engagements (SSAE) System and Organization Controls (SOC) Type III certified. The applicant will maintain records of all system access and will be made available within 48 hours of the Department's request. Upon becoming aware of any data breach that includes personal identifying information obtained during the website purchasing process, applicant will immediately notify patients and caregivers affected, or potentially affected, by the breach and submit a written corrective action plan to the department within seven days of the incident.

All computers in the retail portion of the facility will be equipped with privacy screen which limit the visibility of the screen to the person using the computer. Employees will be trained to never

leave a computer accessible to anyone other than the agents of the facility. Training will go beyond electronics and include how to handle patient questions over the phone and in person.

4. Vehicles & Communication Systems for transporting marijuana: Applicant will purchase a Ford Transit van for each dispensing location to be used strictly for transportation operations of medical marijuana and will be insured with current commercial automobile liability insurance in the amount of one million dollars per incident. There will be no signage or illustrations related to medical marijuana or the applicant. The transport vehicle will be equipped with a GPS tracking system and both cellular and radio communication. The vehicle will be equipped with a video surveillance system with coverage of the exterior front and rear, interior cargo bay and driver's compartment. Video footage will be stored both in the vehicle and streamed back to the Facility where recordings will be stored up to the same requirements of all video surveillance footage. The vehicle will be equipped with run-flat tires, and daily preventative maintenance checks and inspections will be conducted on the vehicle. The rear cargo compartment will not be accessible from the driver's cab. In addition, the rear cargo compartment will be secured with an independent locking mechanism independent from the vehicles. The delivery agents will carry no cash and will only accept electronic payment from the patients via a wireless debit reader or application such as CanPay. When the delivery agents are 5 minutes from the delivery address, they will send a notification back to the dispensary and another notification when they have safely made the delivery and left the location. The delivery vehicle will be equipped with a panic device which will alert the Medical Director and local authorities about their location. When the delivery agents finish their route for the day, they will return to the facility and do a sweep of the vehicle to ensure no marijuana products are left in the vehicle, return all signed manifests to the "Delivery Manifest" binder and report any issues to the MD that may have occurred.

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Subsection 4.6.2 Dispensing Infrastructure Addendum

The following are floorplans of the actual or proposed building(s) where dispensing activities will occur, showing: (i) areas designated to protect patient privacy, including the provision of an appropriately sized waiting area and at least one private patient consultation room; and (ii) areas designated for retail sales.

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Subsection 4.6.3 – Ability to Secure Dispensing Infrastructure

1. Infrastructure that the Applicant has secured as of the date of submission:

(A) Real-Estate:

Applicant has signed Letters of Intent for the sale or long-term lease of each of the six properties identified in Subsection 4.6.2 as proposed dispensing locations. All agreements have been signed by both the buyer and sellers/lesors and execution of the real-estate agreements is contingent upon Applicant's successful licensure. Applicant intends to purchase the properties in Jacksonville, Lakeland, Pensacola, and Port Charlotte. The agreement in place for the property in Largo is for an initial 10-year lease. The agreement in place for the property in Hollywood is for an initial lease period of 5 years.

(B) Goods & Services:

Applicant's leadership team have successfully opened licensed dispensaries in four states and have built a network of vendors, lenders, and transportation specialists to facilitate the opening of the proposed dispensary facilities. Since the applicant has a relationship with these vendors of paying on time and completing construction in accordance with projections, the following vendors have secured necessary equipment per the applicant's specs.

- Design: Applicant has secured vendor Miguel Porras with FOR architecture co. out of Miami to assist in the facility design as prep for the architecture firm. Facility design will mimic applicant facilities in other states.
- Vault: Vault is the longest lead time of all equipment needs for a dispensary facility. Applicant has a financing relationship secured with Vault Structures Incorporated, which has supplied each of the applicant's previous marijuana vaults. Payment does not need to

occur until 90 days after delivery. Applicant has outlined the specifics of the vault required for each facility and shipment will occur the day after being awarded the licensure.

- Millwork: Frank Shatz and Company have been secured as Millwork partner for applicant. Millwork to be produced including transaction counters, reception desk, archway shelving, pegboard display, open shelving for merch and hanging faux beams above reception area.
- Security Devices: **119.071(3)** is an Applicant partner and has already commenced securing security devices needed for the facility, which include video surveillance system, alarm system, motion detectors and glass break detectors.
- **119.071(3)** is providing on-site ATMs.
- Paychex is a trusted partner of the Applicant who provides payroll technologies.
- Dutchie is our point of sale system is used for accepting compliant transactions and maintaining HIPAA compliance.
- Luvbuds for marijuana consumption devices.
- Howard Packaging for exit bags and packaging (3,000 units ordered for launch).
- **119.071(3)** seed to sale
- IHeartJane for website and menu hosting.
- CloudCover Music for in store ambiance.
- Stern Agency Inc - an insurance broker.

2. Infrastructure the Applicant has not yet secured and timeline and schedule:

- Architectural Firm: During department analysis of applications, applicant will engage in an RFP process to vet and select an architectural firm.
- General Contractor: Applicant is speaking with town officials for the proposed facilities regarding general contractor and subs. Applicant aims to create jobs within the

community it serves. Also, applicant has a commitment to hiring minority and veteran contractors for construction of all facilities.

3. Timeframe for Dispensing Authorization: The Applicant is fully capitalized, experienced, and prepared to execute the following steps to implement the proposed MMTC business upon licensure by the Department:

April 1 – May 15: Pre-licensure Steps: While the commission is evaluating applications, applicant is moving forward with Miguel Porras with FOR architecture co. out of Miami, who will manage the development of a permit set of construction documents that will be used for contractor bidding and local permitting. Applicant is working with the municipality to receive permitting approval to commence construction immediately upon licensure. Additionally, Applicant will order all HVAC components and cultivation lights to ensure cultivation authorization is requested within 60 days of licensure, as these two equipment categories have the longest lead times.

Day 1 Post-licensure: Upon approval, Applicant will post a \$5 million performance bond issued by an authorized surety insurance company rated in one of the three highest rating categories by a nationally recognized rating service.

Day 1 – 45 Post-licensure: Propagation Center: With plans and permitting complete, Applicant will prioritize work on Building #1, a 1,700 sq. ft existing building on the property which will be the Propagation Center. The Propagation Center houses the Mother and Clone Rooms, with ample space to cultivate enough clones to service all flower trays outlined in the proposed facility. The rough-in construction will commence immediately following licensure with the priorities of work being framing, electrical, plumbing, HVAC, and security system. After inspections, Applicant will close walls, epoxy floors, and start the finish work for electric, plumbing, HVAC and irrigation. Mother and clone lights install will then occur. Local inspections will take 1 week, and

Applicant will be issued a certificate of occupancy for Building #1. Applicant will then notify the Office of Medical Marijuana Use and submit a Request for Cultivation Authorization. After receiving Written Notice of Authorization, Applicant will then commence growing out the first batch of plants from tissue cultures, the most efficient and genetically consistent way to launch a marijuana cultivation facility.

Day 45 – 87 Post-licenses: First Batch Launch: The Applicant will operate a perpetual harvest cultivation system, where one third of the trays are harvested at a time. To prepare for initial harvest, Applicant needs to prepare for a first harvest of 100 of the 300 total trays in Building #2. Each tray requires 24 clones. Accounting for a 10% loss factor, Applicant will launch the Propagation Center with 2,640 tissue cultures (66 trays of 40 cultures each). Tissue Cultures are given 3 weeks to develop into a small plant, similar to the size of a clone, with an additional 3 weeks to develop a thriving root system. 87 days after receiving licensure from the Department, Applicant will have 2,400 plants ready to be moved into Building #2 for the next stages in the plant lifecycle.

Day 1 – 60 Post-licensure: Veg, Flower and Post-production Buildings: In parallel with the finishing of the Propagation Center outlined above, construction trades will start framing and rough-ins for electric, HVAC, and plumbing on Building #2, Building #3 and Building #4. After initial inspections, the floor is epoxied, walls are insulated and treated with FDA approved wall paneling, and trades begin the finishing work such as duct work installation, bathroom fixtures, ceilings, air filtration systems, electrical outlets, and security systems. Additionally, veg and flower lights, HVAC, mobile racks, irrigation system, and environmental control systems are ordered the first week following licensure.

Day 60 – 74 Post-licensure: Equipment Install: Specialty cultivation equipment such as lights, flower trays, vertical racks for trays, sensors and final irrigation components are installed in Building #2, Building #3 and Building #4. All processing and manufacturing equipment will be installed in building #3, the Postproduction Center. On day 74, Applicant will submit a Request for Authorization for Processing activities along with a request for inspections from the Office of Medical Marijuana Use to approve Building #2, Building #3, and Building #4.

Day 74 – 158 Post-licensure: Flowering out first product: Healthy vegetative plants are moved from Building #1 into the Flower Rooms in Building #2 from the Propagation Center after Commission approvals are received. In the Applicant's system, plants remain in the flower room for a 9-week flower cycle. Plants are harvested, then dried, and cured for an additional 3 weeks. The applicant will have finished product ready for sale by Day 158 post-licensure.

Dispensary Buildout

Day 1 – 22 Post-licensure: Conceptual Design: Plans/drawings for each of the 6 stores proposed for launch will be developed including site plan, architectural plan, MEP plans, and security plan. Additionally, orders are placed for lighting, millwork, vault, and signage.

Day 22 – 49: Planning: The plans generated during the design phase will be compiled into one final document for budgeting, permitting, and bidding for construction. These plans will subsequently be given to a contractor and various trades for pricing. Construction will commence after permits are issued.

Day 49 - 98 Post-licensure: Construction: Timing, sequence, and scope will vary based on either existing building or new construction. In general, the following trades will take place in order: demo, framing, vault installation, mechanical/electrical/plumbing rough-in, security system rough-

in, drywall, doors, mechanical/electrical/plumbing, fixtures, painting, drop ceiling installation, security system device installation, flooring, millwork (shelves, counters, cases).

Day 98 –112 Post-licensure: Finishing: Once awarded the Certificate of Occupancy, the retail operations team will be on-site to install all POS systems, inventory tracking systems, outfit the space with décor, and begin SOP training.

Key Milestones: As referenced in the above plan, please find a summary of key dates associated with Applicant's launch plan:

- Request for Cultivation Authorization: Day 45
- Request for Processing Authorization: Day 74
- First Product Ready for Sale: Day 158
- Request for Dispensing Authorization: Day 170

4. Assumptions made in the authorization timeline:

1. Applicant assumes plans will be complete in a 30-day window.
2. Applicant assumes construction permits will be issued within a 90-day window.

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Section 4.7

Plan for Security and Accountability

Subsection 4.7.1 – Premises Security

1. Manner of Securely Storing Marijuana: Confidential–Exempt from Public Disclosure

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2. Emergency Management Plan for Natural Disasters: Confidential—Exempt from Public Disclosure

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3. Security Alarm System(s) and Video Surveillance System(s):

(A) Intrusion Alarm System: Confidential—Exempt from Public Disclosure

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(B) Video Surveillance System: Confidential—Exempt from Public Disclosure

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(C) Security/IT Closet: Confidential—Exempt from Public Disclosure

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4. Facility Entry Points, Windows, Skylights, and Roof Hatches:

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5. Locking Options for Each Means of Ingress and Egress:

(A) Windows: Confidential-Exempt from Public Disclosure

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(B) Doors: Confidential-Exempt from Public Disclosure

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6. Location of all Security Cameras and Their Field of View: Confidential-Exempt from Public Disclosure

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7. Outdoor Lighting Fixtures: Confidential-Exempt from Public Disclosure

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8. Location of Alarm Inputs: Confidential-Exempt from Public Disclosure

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Subsection 4.7.1 Premises Security Addendum

The following are floorplans of the cultivation, processing, and dispensing facilities identified in Subsections 4.4.2, 4.5.2, and 4.6.2.

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Dispensing Facilities

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Cultivation and Processing Facilities

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3. Third Party Cyber Security: Confidential—Exempt from Public Disclosure

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Subsection 4.7.3 – Diversion, Unlawful Access, and Transportation

1. Inventory Tracking and Control Systems: Confidential-Exempt from Public Disclosure

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2. Waste disposal: Confidential-Exempt from Public Disclosure

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3. Vehicle Security and Tracking Systems: Confidential—Exempt from Public Disclosure

3. Vehicle Security and Tracking Systems: Confidential—Exempt from Public Disclosure

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4. Vehicle Maintenance Plans: Confidential-Exempt from Public Disclosure

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- 5. Transportation Manifests:** Confidential—Exempt from Public Disclosure

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Subsection 4.7.4 – Personnel Screening and Training

1. Background Screening and Documentation to Department: Confidential–Exempt from Public Disclosure

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Subsection 4.7.5 – Recalls

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Section 4.8

Ability to Execute Proposed Plans

Subsection 4.8.1 – Experience in the Marijuana Industry (Applicant)

Applicant's cultivation, processing, infrastructure, and security operations teams have worked collaboratively for years planning, implementing, and operating thriving, innovative businesses in the cannabis and medical cannabis industry. The leadership team assembled have all played central roles in the successes outlined in this subsection. Constant across the team's experience is an emphasis on security, education, quality of care, product innovation, quality assurance, transparency, accountability, and environmental responsibility. None of Applicant's team nor any marijuana industry business where any team member has worked has ever been subject to regulatory discipline or fines.

Applicant's team has been awarded cannabis business licenses in five states. In each, team members have found success consistently navigating the complexities unique to the industry and each state's market. Applicant's team has established and regularly refined comprehensive Standard Operating Procedures and best practices guidelines for every aspect of each business initiative. These SOPs have ensured safe, compliant, and successful operations in all ventures. The SOPs are included in team lead training and evaluation procedures required of all staff members, developing a workforce that has never been subject to any regulatory discipline. In the four operational dispensaries managed by the Applicant's team, customers have consistently scored each dispensary at 4.9 out of 5 stars across hundreds of reviews on Google, Leafly and Weedmaps. The demonstrable excellence of Applicant's team in these respects led has burnished the reputation of key personal sufficient to securing over \$20,000,000 in outside investment to launch new cannabis businesses. Specific examples to highlight the ability of the Applicant to execute the plan proposed in this document include recent successes in New Jersey and Rhode Island, where key members of Applicant's Florida team secured licensure through competitive medical cannabis

RFAs in the 2019 and 2020, respectively. In each instance, Applicant's team members successfully launched the newly licensed business before all other licensees awarded in the same RFA process.

At the core of the team is Jason Webski, who will serve as Chief Executive Officer. Jason began assembling the members of Applicant's operational leadership in 2017 when he entered the cannabis industry after losing his father to an opioid overdose. Assured of the personal and societal health benefits medical marijuana affords as a safer and more efficient therapeutic option,, what started as a passion has evolved into a physician-guided enterprise consisting of medical doctors,, pharmacists, plant scientists, ,botanists, and various specialists from around the country who are committed to advancing both the art and science of medicinal cannabinoids. Even as the team gained new and invaluable experience by expanding into the adult-use market, safe and compassionate treatment tailored to individual needs has remained the core focus of all operations and team members.

The first collaborative effort by members of Applicant's leadership team in the cannabis industry was the design, construction, and operation of a medical marijuana cultivation facility in Rhode Island. This first venture continues to operate as a thriving vertically integrated cultivator, processor, and retailer for medical patients and, as of 2022, adult use clientele. The team manages additional facilities in Maine, Maryland, and New Jersey and is in-construction in Connecticut.

Jason Tucker, Applicant's Cultivation Director, has five years of experience designing and operating cannabis cultivation systems which began by drafting the Standard Operating Procedures for Cultivation at the Rhode Island medical cultivation facility. Innovations developed and lessons learned through his tenure were incorporated in his designs for the cultivation systems and procedures for subsequently licensed facilities in Maine, Connecticut, and New Jersey. Achievements at these facilities, which will be replicated at Applicant's Florida cultivation facility,

include the design and implementation of fully recyclable irrigation systems, pesticide-free cultivation practices, and the development and use of a highly effective proprietary nutrient formula. Mr. Tucker demonstrated his adaptability by refining the Standard Operating Procedures for Cultivation to include ozonation to prevent the risk of overwatering and the use of mobile, vertically tiered racking equipment to greatly increase yield capacity and efficiency. The cultivation system developed and implemented by Applicant's Cultivation Director has enabled the perpetual harvest of safe and high-quality marijuana and low-THC cannabis in indoor cultivation environments for the past five years. Jason and his team successfully grew 64 cultivars of *Cannabis Sativa* and *Cannabis Indica* for the purpose of analyzing plant genetics and the ways each cultivar responds to variable cultivation methods and environments.

Led by Mr. Tucker, Applicant's cultivation team is expert in developing specific terpene profiles for each cultivar, expanding the medicinal and therapeutic potential of the products available to patients. Highly advanced terpene profiling, which additionally helps improve the quality and consistency of smokeable product flavor, is an intensive organic process that requires a mastery of plant genetics and the delicate application of specific nutrient mixes, irrigation practices, and highly calibrated environmental controls. For that reason, many industry participants neglect to focus on terpene profile. Applicant's team has built their cultivation philosophy and systems around this practice as the experiential and therapeutic benefits it provides resonate with the team's core long-term objectives for the industry.

Matt Belair, Post-Production Manager, will oversee Applicant's extraction operations. Matt has over four years of experience in overseeing all aspects of marijuana harvest and processing. This includes inventory control, proper record keeping via various seed-to-sale tracking platforms, batching & quality control, and laboratory testing & analysis. Matt has created SOPs for the

operation of various extraction systems, including supercritical carbon dioxide extraction systems similar to the one Applicant will utilize.

Other members of Applicant's processing team have developed valuable experience during their tenure at the vertically licensed Rhode Island facility. There, the team has developed a line of unique derivative products and edibles meant to highlight Applicant's focus on specially developed terpene profiles. In addition to product formulation and production, the team brings with it experience operating in accordance with stringent food safety standards. Applicant's processing team has also made significant investments into continuously improving the packaging used at the facilities they've overseen, including the exclusive use of recyclable materials.

The Applicant's Dispensary Operations team has launched and operated four licensed dispensary facilities. Peter Franklin, who will serve as the MMTC's Dispensing Director, developed the Standard Operating Procedures for Retail & Medical Sales at all four facilities. Each business has enjoyed sustained success and earned hard-won customer appreciation and loyalty; all operations are currently rated as either 4.9 or 5.0 on Google reviews.

Peter also implemented the first approved cannabis home delivery operation in the **119.071(3)**, which will inform Applicant's delivery and transportation SOPs. The dispensing team's unbroken record of success can be attributed to the emphasis placed on patient & client education and personalized service. Medical patients and adult-use consumers alike are provided with individual consultations with the option of outlining a personalized treatment or use plan based on the individual's treatment needs, physician recommendations, personal taste, and comfortability with use of THC or CBD products. No staff member begins work in any patient or customer facing role without first completing thorough training and evaluation on methods to develop personalized product recommendations and patient/customer education covering the safe use and storage of

marijuana and associated products. In medical dispensing locations, SOPs outline the requirement for a pharmacist or physician to educate, dispense, and follow-up with patients in a compassionate, knowledgeable way to ensure proper dosing, patient comfort, treatment effectiveness, and the prompt response to any potential adverse reactions.

Applicant's Chief Operating Officer is Blake Costa, who will also serve as Director of Security & Safety through the planning, construction, and authorization processes. Blake has designed the comprehensive security systems and Workplace Safety SOPs for ten cannabis business facilities over five years, including locations for cultivating, processing, and dispensing cannabis. A decorated Marine veteran, Blake developed his security designs, equipment allocation, and procedures based off the security methods and tactics he employed while serving as a security specialist for sensitive U.S. government facilities abroad.

Applicant's Agricultural Advisor, Jason Jennings, has directed Alamanda Farms' hemp cultivation operations on the premises of Applicant's proposed cultivation facility for two years and overseen operations at the property since 2007. As a Florida DACS-licensed hemp cultivator, Mr. Jennings employed advanced agricultural processing techniques to distinguish his product in a saturated market. Mr. Jennings constructed a custom hemp processing facility utilizing equipment and processes of his own design. This system enabled Mr. Jennings to turn surplus hemp biomass into marketable products formulated to relieve symptoms of muscle pain, arthritis, and insomnia.

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Subsection 4.8.2 – Other Relevant Experience

Applicant's leadership team is comprised of dedicated professionals with previous experience in an array of industries and job functions. Supplementing the team's deep experience in the cannabis industry, the diverse capabilities of leading team members enable Applicant to creatively and effectively meet the complex demands ever-present in such a highly regulated, wide-ranging, and relatively new industry.

1. Jason Webski, Chief Executive Officer: Jason has 5 years' experience managing regulated, high-performing businesses in the cannabis sector. Prior to entering the Cannabis sector, Jason Webski, began his career working for UBS bank and was responsible for **analytical and research projects focused on compliance assurance** with rigorous banking regulations and anti-money laundering protocols. Soon after, Jason pursued a PR and Marketing role and became an intern at the Miss Universe Organization. Jason worked his way up to Director of Marketing, working with tourism groups around the world to structure host site deals for the Miss Universe live shows. Jason worked with regulatory bodies in countries around the world to plan the show, coordinating with tourism departments, international dignitaries, and government officials.

2. Carl Allison, Chief Financial Officer: Carl has 5 years' experience managing highly regulated businesses in the cannabis sector. For 25 years before entering the cannabis industry, Carl held several high-level positions with a focus on financial management, accounting, budgeting & forecasting, strategic planning, and compliance for businesses in several industries. For 13 years, Carl served as a CFO in the highly regulated gaming industry., Previously, as a VP of Finance of a media company, Carl also oversaw, organized, and submitted annual and quarterly 10-K and 10-Q Securities and Exchange Commission filings. Carl also has significant private equity experience

including structuring complex acquisitions, overseeing financial reporting, supervising cash flow management, and conducting annual audits.

3. Bryan Lucas, JD; Legal Counsel & Director of Government Affairs: Bryan has extensive experience in administrative law, regulatory compliance, and governmental affairs. His experience will help **assure** Applicant's **full** legal and regulatory compliance, which is as important to the medical marijuana patients of Florida as it is to the Applicant itself. Bryan began his legal career with a clerkship at the Superior Court of New Jersey, Essex County, before entering private practice. Bryan then entered public service by serving first as a New Jersey Deputy Attorney General and later as Special Assistant to the Director at the New Jersey Office of the Attorney General, Division of Law. In that role, he provided leadership to the team providing legal counsel to hundreds of state agencies and departments. Bryan is also a Captain in the United States Army Reserve, where he serves as a Judge Advocate and provides legal assistance to soldiers and their families.

4. James Smith, Community Affairs & Recruitment Liaison: James has dedicated his career to promoting economic development in marginalized communities and empowering at-risk youth with a criminal background to find pathways to gainful employment and a second chance for a stable life. Most of the individuals that James has worked with have criminal backgrounds due to Marijuana possession charges. James works directly with youthful former offenders by offering training on basic job skills, teaching resume building techniques, and assisting with employment placement. To support his mission, James established the non-profit Bridge 2 Career to facilitate access to government programs and social support services available to struggling and at-risk residents of his hometown of Baltimore, Maryland. In particular, he has nurtured a robust and enduring working relationship between his organization and the Baltimore Mayor's Office of

Employment and Development. Over the past 4 years, Bridge 2 Career has worked within the regulatory structure of the social justice system, training and working with hundreds of inmates in preparation for their re-entry to the workforce.

5. Dr. David L. Abramson, M.D., Medical Director: Dr. Abramson is a Board-certified Plastic Surgeon with 35 years' experience practicing, researching, and teaching medicine. Dr. Abramson began his medical career in 1988 after graduation from the New York University School of Medicine. Since 2009, he has been Chief of Plastic Surgery at Englewood Heath. As a board-certified plastic surgeon, Dr. Abramson has extensive experience guiding patients through pain management treatment plans and has maintained a command of the current body of medical and scientific literature relating to pain management including the use of medical marijuana as an alternative for patients for whom opioid treatments is inadvisable or ineffective.

6. Matt Horoski, Controller: Matt holds a Bachelor of Science in Accounting with a Forensic Accounting Specialization. He is currently pursuing a Professional MBA at the University of South Carolina while working full-time as a payroll administrator. Previously he spent time as an auditor at Baker Tilly. Matt volunteers his accounting expertise, providing free tax preparation service to members of his local community experiencing financial hardship.

7. David Werdelin, Construction Manager: David has spent two years managing the construction process from permitting through certification of occupancy for cannabis industry businesses. and coordination of owners, engineers, architects, contractors, and internal stakeholders for cannabis companies for 2 years. Before entering the cannabis sector, he spent 4 years as a commercial general contractor David also has 3 experience overseeing the operation of an 80,000 sq. ft. CNC facility as a project manager with Harvey Performance Company.

8. Tom Lew, Marketing Director: With one year of cannabis experience, Tom is a creative marketer with a diverse portfolio in brand development and advertising. He has produced advertising campaigns for broadcast television as well as short form digital media formats for recognized brands such as Walmart, Verizon, and Gucci. Tom was project lead on developing a mobile voting platform for a primetime live-audience awards show on broadcast by FOX which saw a category-record setting 2.5 million concurrent viewers. Tom has spent years coordinating with communications regulators and developing content. He is now focused on producing educational cannabis-related content.

9. Zachary Gordon, Project Manager: Zach has 3 years of facilities management experience as a project manager with an Owner's Rep construction management firm specialized for clients in sensitive and highly regulated industries. Supporting clients in the healthcare, education, and senior care industries, Zach coordinated with facilities & operations staff to review and assess hospitals, nursing homes, and schools for regulatory and code compliance. His experience includes planning and coordinating capital projects on behalf of public sector and healthcare institutions including compliance-oriented systems upgrades, retrofits, and new construction projects. Zachary later worked as a public affairs consultant managing teams across the country to organize and implement public outreach & persuasion campaigns for trade associations, issue advocacy organizations, and political campaign committees.

10. Kenneth McKenna, partner at Dellecker, Wilson, King, McKenna, Ruffier & SOS: Kenneth earned his law degree from the University of Florida in 1994. He is a member of the Central Florida Trial Lawyers Association, the Florida Bar, Orange County Bar Association, Brevard County Bar Association, Florida Justice Association, the District of Columbia Bar, and the American Association for Justice. He is admitted into all courts in the State of Florida and the

Middle District of Florida in the U.S. District Court. Throughout his career, he has received an abundance of distinctions, including an AV Preeminent Rating through Martindale-Hubbell, Florida Super Lawyers (2010–2018), and Florida Trend Legal Elite (2008, 2010, 2011). He remains involved with the American Association for Justice and the Central Florida Trial Lawyers Association. Kenneth has served in leadership positions for the Ronald McDonald House Charities of Central Florida.

11. Horticulture and Medical Advisory: Additionally, the team has a wide network of advisors and consultants with years of experience in the cannabis industry:

- Mfon Ekanem Pharm D.: Licensed pharmacist and Medical Advisor to dispensary for 4 years.
- Dr. Diana Coats: Developmental plant biologist, with formal training in plant physiology, genetics, breeding, cloning, biochemistry, and molecular biology.
- Laurie Conlin: 20 years of horticulture experience in traditional agriculture.
- Dr. Jay Berkowitz: Former head of Psychiatry for the Department of Corrections in Connecticut, focused on effects of prescription drugs and mental health.
- Dr. Harry Ma: Vascular surgeon with experience prescribing cannabis for pain management to alleviate opioid addiction.
- Dr. Sepehr Sajjad: Active surgeon with residency in Miami, Florida, focused on cannabis for pain management to alleviate opioid dependence.
- Dr. Justin Mirza: Active surgeon with residency in Miami, Florida, focused on cannabis for pain management to alleviate opioid dependence.

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Subsection 4.8.3 – Business Plan

The Applicant is comprised of experienced cannabis operators familiar with the complexities of zoning, planning, and launching businesses in the cannabis sector. The Applicant's team has a track record that includes (1) Winning, building out and operating medical cannabis licenses in four states. (2) Securing over \$20,000,000 in funding for initial capital investments. (3) Completing rigorous Standard Operating Procedures that are compliant with the regulations in each state. (4) Hiring and training staff at each facility with in-depth training curriculums. (5) Was the first dispensary out of the 2019 Medical Dispensary winners in New Jersey to open. (6) Was the first dispensary out of the 2020 Medical Dispensary license winners in Rhode Island to open. With a track record of exceeding regulatory standards and proving to be the best in state with speed to market and transparency, the Applicant is proud to have fostered strong working relationships with regulatory bodies in each state it operates. Applicant is confident it will exceed Department expectations and continue growing its reputation as a best-in-class medical cannabis business.

The proposed cultivation facility is in the Applicant's control and includes repurposing 4 pre-existing agriculture processing buildings. Each building will be repurposed as follows:

- Building #1: Propagation Center A: 1,722 sq. ft.
- Building #2: Veg and Flower Center 20,000 sq. ft.
- Building #3: Post-Production Center: 7,800 sq. ft.
- Building #4: Propagation Center B: 1,824 sq. ft.
- Building #5: Veg and Flower Center 15,000 sq. ft

The Applicant is fully capitalized, experienced, and prepared to execute the following steps to implement the proposed MMTC business upon licensure by the Department. The construction timeline includes consideration of local permitting timeline, Department inspection timelines and

padding to ensure the Applicant satisfies the Department's requirements to request cultivation authorization within 60 day, processing authorization within 120 days and dispensing authorization within 180 days.

April 1 – May 15: Pre-licensure Steps: While the commission is evaluating applications, applicant is moving forward Miguel Porras with FOR architecture co. out of Miami, who will manage the development of a permit set of construction documents that will be used for contractor bidding and local permitting. Applicant is working with the municipality to receive permitting approval to commence construction immediately upon licensure. Additionally, Applicant will order all HVAC and lighting components, as these two equipment categories have the longest lead times.

Day 1 Post-licensure: Upon approval, Applicant will post a \$5 million performance bond issued by an authorized surety insurance company rated in one of the three highest rating categories by a nationally recognized rating service.

1. Cultivation and Processing Authorization

Day 1 – 45 Post-licensure: Propagation Center: With plans and permitting complete, Applicant will prioritize Building #1, a 1,722 sq. ft existing building on the property which is to be used as the Propagation Center. The Propagation Center houses the Mother and Clone rooms, which provide ample space to propagate the appropriate amount of clones to service all flower trays outlined in the proposed facility. The rough-in construction will commence immediately following licensure with the priorities of work being framing, electrical, plumbing, HVAC, and security system. After local inspections, Applicant will close walls, epoxy floors, and start the finish work for electric, plumbing, HVAC and irrigation. Mother and clone lights will then be installed. With a Certificate of Occupancy issued for a finished Propagation Center, applicant will then notify the OMMU and submit a request for cultivation authorization. After receiving Written Notice of

Authorization, Applicant will immediately commence growing out the first batch of plants from tissue cultures, the most efficient and genetically consistent way to launch a cultivation facility.

Day 45 – 87 Post-licensesures: First Batch Launch: The Applicant will operate a perpetual harvest cultivation system, where one third of the trays are harvested at a time. To prepare for initial harvest, Applicant will plant enough tissue cultures to satisfy 24 plants per flower tray, inclusive of a 10% loss factor. Tissue Cultures are given 3 weeks to develop into a small plant, similar in size to a clone, with an additional 3 weeks to develop a thriving root system. 87 days after receiving licensure from the Department, Applicant will have plants ready to be moved into Building #2 for the next stages in the plant lifecycle.

Day 1 – 60 Post-licensure: Veg, Flower and Post-Production Buildings: In parallel with finishing the Propagation Center Day 1 through day 45 post licensure, construction trades will start framing and rough-ins for electric, HVAC, and plumbing on Building #2 and Building #3. After initial inspections, the floors are epoxied, walls are insulated and treated with FDA approved wall paneling, and trades begin the finishing work (duct work installation, bathroom fixtures, ceilings, air filtration systems, electrical outlets, and security systems). Additionally, vegetative and flower lights, HVAC, mobile racks, irrigation system, and environmental control systems are ordered the first week following licensure.

Day 60 – 74 Post-licensure: Equipment Install: Specialty cultivation equipment such as lights, flower trays, vertical racks, sensors and final irrigation components are installed in Building #2 and Building #3. All processing and manufacturing equipment will be installed in Building #3, the Postproduction Center. After local inspections, on day 74, Applicant will notify the OMMU and submit a request for processing authorization.

Day 74 – 158 Post-licensure: Flowering out first product: Healthy vegetative plants are moved from Building #1 into the Flower Rooms in Building #2 from the Propagation Center after Department approvals. In the Applicant's system, plants remain in the flower room for a 9-week flower cycle. Plants are harvested, then dried, and cured for an additional 3 weeks. The applicant will have finished product ready for sale by Day 158 post-licensure.

2. Dispensary Buildout

Day 1 – 22 Post-licensure: Conceptual Design: Plans/drawings for each of the x stores proposed for launch will be developed including site plan, architectural plan, MEP plans, and security plan. Additionally, orders are placed for lighting, millwork, vault and signage.

Day 22 – 49: Planning: The plans generated during the design phase will be compiled into one final document for budgeting, permitting, and bidding for construction. The plans will then be given to a contractor and various trades for pricing. Construction will commence after permits are issued.

Day 49 - 98 Post-licensure: Construction: Timing, sequence, and scope will vary based on either existing building or new construction. In general, the following trades will take place in order: demo, framing, vault installation, mechanical/electrical/plumbing rough-in, security system rough-in, drywall, doors, mechanical/electrical/plumbing, fixtures, painting, drop ceiling installation, security system device installation, flooring, millwork (shelves, counters, cases).

Day 98 –112 Post-licensure: Finishing: Once awarded the Certificate of Occupancy, the retail ops team will be on site to install all point-of-sale systems, 119.071(3), outfit the space with décor, and begin SOP and mock sale training. Applicant will wait for processing authorization before requesting dispensing authorization from the OMMU, which will occur 160 days after licensure.

3. Staffing Schedule

Applicant has a robust recruitment and training program led by experienced operators. Module-based training and job-shadowing is mandatory before work commences. All employees are tested after each module to ensure satisfactory understanding of operations. Hiring timeline includes:

- Day 1 post-licensure: Job posting goes live and the HR team notifies partners in workforce development, which includes the American Job Center and HireAVeteran.com.
- Cultivation Manager: Commence work on day 45 post licensure.
- Plant Technicians: Commence work on day 74 post licensure.
- Postproduction Supervisor and team: Commence work on day 109 post licensure.
- Dispensary Managers: All Dispensary Managers commence work on day 98 post licensure.
- Dispensary Technicians: Commence work on day 108 post licensure.

4. Key Milestones Summary: As identified in the detailed business plan, Applicant is prepared to implement the proposed MMTC upon licensure by the Department. Key milestones include:

- Request for Cultivation Authorization: Day 45
- Request for Processing Authorization: Day 74
- First Product Ready for Sale: Day 158
- Request for Dispensing Authorization: Day 160-180

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Subsection 4.8.4 – Prior Enforcement Action

1.Previous Florida MMTC License: The Applicant has not previously held a Florida dispensing organization license or MMTC license. There has been no enforcement action taken against the Applicant relating to the operation of either a Florida dispensing license or MMTC license.

2.Previous Licensure in Other Jurisdictions: The Applicant's parent company and team members operate medical and recreational facilities across four states. Neither the Applicant nor any of its team members have ever been subject to any enforcement action relating to the cultivation, processing, or dispensing of marijuana in any jurisdiction. Additionally, the Applicant, including its team members, has not been compelled to recall marijuana or marijuana product in any other jurisdiction.

- Plant Based Compassionate Care Inc.: Rhode Island Cultivation, Processing, & Dispensary License;
 - There has been no enforcement action taken against this business/license.
 - No recall marijuana or marijuana product has ever occurred in this business/license.
 - No owner or manager of this entity has previously served as an owner or manager of a Florida-licensed dispensing organization or MMTC.
 - No owner or manager has been subject to any enforcement action by the applicable licensing body.
 - No owner or manager has been compelled to recall marijuana or marijuana product.
- B1 Earthgroup LLC: Maryland Dispensary License;
 - There has been no enforcement action taken against this business/license.

- No recall marijuana or marijuana product has ever occurred in this business/license.
- No owner or manager of this entity has previously served as an owner or manager of a Florida-licensed dispensing organization or MMTC.
- No owner or manager has been subject to any enforcement action by the applicable licensing body.
- No owner or manager has been compelled to recall marijuana or marijuana product.
- ME Plant Based Therapy LLC: Maine Dispensary License;
 - There has been no enforcement action taken against this business/license.
 - No recall marijuana or marijuana product has ever occurred in this business/license.
 - No owner or manager of this entity has previously served as an owner or manager of a Florida-licensed dispensing organization or MMTC.
 - No owner or manager has been subject to any enforcement action by the applicable licensing body.
 - No owner or manager has been compelled to recall marijuana or marijuana product.
- ME Plant Based Compassionate Care LLC: Maine Cultivation License;
 - There has been no enforcement action taken against this business/license.
 - No recall marijuana or marijuana product has ever occurred in this business/license.

- No owner or manager of this entity has previously served as an owner or manager of a Florida-licensed dispensing organization or MMTC.
- No owner or manager has been subject to any enforcement action by the applicable licensing body.
- No owner or manager has been compelled to recall marijuana or marijuana product.
- Veterans for Alternative Medicine South Jersey LLC: New Jersey Cultivation License
 - There has been no enforcement action taken against this business/license.
 - No recall marijuana or marijuana product has ever occurred in this business/license.
 - No owner or manager of this entity has previously served as an owner or manager of a Florida-licensed dispensing organization or MMTC.
 - No owner or manager has been subject to any enforcement action by the applicable licensing body.
 - No owner or manager has been compelled to recall marijuana or marijuana product.
- Sweetspot Dispensary LLC: New Jersey Dispensary License
 - There has been no enforcement action taken against this business/license.
 - No recall marijuana or marijuana product has ever occurred in this business/license.
 - No owner or manager of this entity has previously served as an owner or manager of a Florida-licensed dispensing organization or MMTC.

- No owner or manager has been subject to any enforcement action by the applicable licensing body.
- No owner or manager has been compelled to recall marijuana or marijuana product.
- CT Plant Based Compassionate Care LLC: Connecticut Cultivation License
 - There has been no enforcement action taken against this business/license.
 - No recall marijuana or marijuana product has ever occurred in this business/license.
 - No owner or manager of this entity has previously served as an owner or manager of a Florida-licensed dispensing organization or MMTC.
 - No owner or manager has been subject to any enforcement action by the applicable licensing body.
 - No owner or manager has been compelled to recall marijuana or marijuana product.

3. Each owner and manager of an entity-applicant: No owner or manager has previously served as an owner or manager of a Florida-licensed dispensing organization or MMTC that has been subject to any enforcement action by the Department.

No owner or manager has previously served as an owner or manager of an entity licensed in another jurisdiction to cultivate, process, or dispense marijuana that has been subject to any enforcement action by the applicable licensing body.

No owner or manager has previously served as an owner or manager of an entity licensed in another jurisdiction to cultivate, process, or dispense marijuana that has been compelled to recall marijuana or marijuana product.

4. Non-cannabis Business/License Possessed by Applicant: The Applicant possesses a License to Cultivate Hemp issued by the Florida Department of Agriculture and Consumer Services Division of Plant Industry. No enforcement action has been taken against the Applicant by any authority with Jurisdiction in the State of Florida.

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Section 4.9

Medical Director

Subsection 4.9.1 – Experience in the Marijuana Industry (Medical Director)

Applicant's Medical Director is Dr. David L. Abramson, M.D. Dr. Abramson is a Board-certified Plastic Surgeon with 35 years' experience practicing, researching, and teaching medicine. Dr. Abramson began his medical career in 1988 after graduation from the New York University School of Medicine. Since 2009, he has been Chief of Plastic Surgery at Englewood Heath.

Dr. Abramson's practice and field of study has been focused on non-elective surgical procedures for patients suffering traumatic injury or requiring constructive surgery following procedures undertaken to address serious and often terminal conditions, the most prominent of which is cancer. Pain management plans is an important element of patient care in such instances, and Dr. Abramson has extensive practical experience and continuing education relating to formulating and monitoring pain management treatment strategies, including the use of medical marijuana.

Dr. Abramson's interest in medical marijuana emerged in response to concerns over the habit-forming nature and numerous adverse side effects associated with many of the most prescribed pain management medications, particularly opioid medications. Through years of research and clinical research study analysis, he found that medical marijuana could be safer and less dependency-inducing treatment option for patients. His commitment to medical cannabis evolved into Dr. Abramson's becoming an early investor in Marijuana Doctor.

Marijuana Doctor is a Florida medical practice specialized in connecting Floridians in need of medical marijuana and low-THC cannabis treatment with Florida Qualified Physicians for treatment of approved conditions. Marijuana Doctor has 35 locations across Florida and Qualified

Physicians employed with Marijuana Doctor assist perspective patients in the process of properly registering in the Medical Marijuana Use Registry in addition to assessing and treating the medical conditions of patients with approved conditions.

Dr. Abramson has never played an active managerial role in Marijuana Doctor but has continuously served in an advisory capacity to management and the practice's Qualified Physicians. In particular, Dr. Abramson has advised the practice on the use of medical marijuana as a pain management treatment for patients and in best practices for identifying substance use disorders in patients.

Additionally, Dr. Abramson has lent advisory services to the applicant and its affiliates. In this capacity, Dr. Abramson has advised on strategies to effectuate the most beneficial cannabinoid profiles of cultivated inventory for medical use purposes, advising on recent studies on specific terpene and cannabinoid composition and symptom relief.

Dr. Abramson has never been employed by an entity authorized to cultivate, process, or dispense marijuana in Florida or any other jurisdiction. He will join the applicant upon licensure.

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Subsection 4.9.2 – Other Relevant Experience

As a board-certified plastic surgeon, Dr. Abramson has extensive experience guiding patients through pain management treatment plans and has maintained a command of the current body of medical and scientific literature relating to pain management including the use of medical marijuana as an alternative for patients for whom opioid treatments is inadvisable or ineffective.

1. Treatment of Approved & Terminal Conditions: In his practice, Dr. Abramson has cared for patients suffering from various forms of cancer and other terminal conditions. Much of Dr. Abramson's surgical practice has been focused on surgical procedures done in conjunction with operations to remove cancerous tumors or otherwise surgically remediate various life-threatening conditions, including operations intended to improve the comfort or longevity of terminal ill patients. In addition, Dr. Abramson carries extensive experience doing reconstructive surgeries for patients who suffered traumatic injuries. Dr. Abramson has developed a substantial history of successfully treating patients suffering from Post-Traumatic Stress Disorder.

2. Drug Dependency & Substance Use Disorder: In his practice and through continuing medical education efforts, Dr. Abramson has heavily invested in learning to effectively recognize drug dependency or substance use disorders in his patients and to identify both alternative treatment options and assisting such patients to find substance use disorder treatment programs when necessary. He maintains regular updates with the Substance Abuse and Mental Health Services Administration, including clinical findings that may assist patients with substance abuse disorder. He will help the patient find local resources such as substance abuse treatment centers, support groups, or therapists who specialize in addiction.

3. Patient Education: Dr. Abramson has extensive patient education experience focused on ensuring the safe and proper use of medications. Dr. Abramson maintains the practice of

addressing the health and dependency related risks of any pain management treatment with each of his patients prior to prescribing such medications. He utilized pain rating systems and a detailed patient history to determine appropriate course of action. Dr. Abramson remains actively involved in decisions relating to extended or long-term use of pain management medication and works with his patients to develop titration strategies which address each patient's pain management considerations within a strategy to limit the dosages and duration of use.

4. Pharmaceutical Formulations, Dosages, and Treatments: Pain management is a significant component of Dr. Abramson's work with most of his patients. As a result, Dr. Abramson has extensive experience prescribing medication for pain management, including formulating safe and effective pharmaceutical treatment options and dosages.

5. Observational & Research Experience: Over his three decades as a seasoned surgeon, Dr. Abramson has participated in a wide variety of clinical trials. Dr. Abramson has led research initiatives relating to medical devices, technologies, and surgical techniques on behalf of Gemstone Bioscience, Christie Medical, and Nanohealth USA. He has been published in scientific and medical literature dozens of times.

6. Additional Relevant Experience: Dr. Abramson has staff management, training, and organization strategy experience in several capacities. Since 2020, he has served as President of the Englewood Health medical staff. He supervises and educates an average of six resident physicians each year and has held various academic positions at medical education institutions including the State University of New York, Harvard University, and Mount Sinai School of Medicine. He has also held the position of Medical Director at NanoHealth USA from 2015-2019 and has been a member of the Medical Advisory Board of Gemstone Bioscience since 2015.

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Subsection 4.9.2 Addendum

David L. Abramson M.D.

Home Address

2000 South Ocean Blvd
107S
Palm Beach, Fl 33480
Tel: 201-264-9254
E-mail: plasticsurgerydoc@dkabramson.com
Marital Status: Married

Business Address

363 Grand Avenue
Englewood, New Jersey 07631
Tel: 201-568-6977

Current Positions:

2009-present	Chief of Plastic Surgery Englewood Health
2018-present	Board of Trustees Englewood Health
2020-present	President Englewood Health Medical Staff
2019- present	Board of Trustees- System Board Englewood Health

Graduate Medical Education:

1984-1988 New York University School of Medicine; M.D., 1988

Undergraduate Education:

1980-1984 The Johns Hopkins University; B.A., Natural Sciences, 1984

Post-Graduate Medical Education:

1995-1996	Craniofacial Fellowship, Department of Surgery Harvard/Brigham/Children's Division of Plastic Surgery
1994-1995	Chief Resident, Plastic Surgery, Department of Surgery Harvard/Brigham/Children's Division of Plastic Surgery
1993-1994	Resident, Plastic Surgery, Department of Surgery Harvard/Brigham/Children's Division of Plastic Surgery
1992-1993	Chief Resident, Department of Surgery State University of New York Health Science Center at Brooklyn
1988-1992	Resident, Department of Surgery State University of New York Health Science Center at Brooklyn

Hospital Appointments

Manhattan Eye Ear and Throat Hospital-1996- present; Attending
University Hospital of Brooklyn 1996-2006; Attending Surgeon
Englewood Hospital and Medical Center- 1996-present; Attending Surgeon
Holy Name Hospital 1996- present; Attending Surgeon
New York Eye and Ear Infirmary 1996-2005
Lenox Hill Hospital 1998-present; Assistant Attending

Appointments:

2010-present	Associate Clinical Professor of Surgery Mount Sinai School of Medicine
2014-2017	Acting Chief Surgical Services- Englewood Hospital and Medical Center
2000-2006	Associate Professor of Surgery(Plastic) State University of New York-Heath Science Center at Brooklyn
1997-2001	Chief, Division of Plastic and Reconstructive Surgery Associate Professor of Surgery State University of New York-Health Science Center at Brooklyn
1996-1997	Clinical Assistant Professor of Surgery/Plastic Surgery State University of New York-Health Science Center at Brooklyn
1993-1996	Clinical Fellow in Surgery Harvard University
1988-1993	Clinical Assistant Instructor: State University of New York Health Science Center at Brooklyn

Board Certification

American Board of Plastic Surgery, 1998 (Certificate #-5337) Recertification 2006, 2018, MOC-current
American Board of Surgery, 1994-2004 (Certificate #-39038)
National Board of Medical Examiners, 1989 (Certificate # 351690)

Licenses

New York, 1989-present	#179986
Massachusetts, 1993-1996	#77300
New Jersey, 1996-present	MA63580
Florida, 2022-present	ME 156947

Society Memberships

American College of Surgeons- Candidate 1990-1993 Associate Fellow 1996-1998
American Medical Association- 1987-1996, 2006-2009
Medical Society of the State of New York 1984-1988, 1996-2017
American Society of Plastic Surgeons- Resident Member 1993-1995, Candidate 1995-1998
Member 1998-
American Cleft Palate-Craniofacial Association-Student Member 1995-1997
Association of Academic Chairmen in Plastic Surgery 1998-2000
American Society For Laser Medicine and Surgery 1998-1999
New York Regional Society of Plastic and Reconstructive Surgery 1998-
American Society of Aesthetic Plastic Surgery 2002-2016
New Jersey Society of Plastic Surgeons 2003-

Industry Positions and Consulting

Musculoskeletal Foundation Consultant 2012-2015
Gemstone Bioscience- Medical Advisory Board 2015-present
Christie Medical- Consultant 2017-present
NanoHealth USA- Medical Director 2015-2019

Honors and Awards:

President New York University School of Medicine Class of 1988
Associate Editor "The Violet", NYU School of Medicine Yearbook
Phi Beta Kappa Society Johns Hopkins University 1984
First Prize Poster-Society for Gastrointestinal Endoscopic Surgeons April 1991 Monterey, CA
Deans List Johns Hopkins University
First Prize Poster Head and Neck Society San Francisco 2000

Committee Memberships

Government Relations Committee ASPRS- 1998-2000
Bylaws Committee- AACPS 1999-2000
Public Education Committee ASAPS- 2005-2009
Hot Topics Committee ASPS 2006-2009
Englewood Hospital- Credentials Committee 2008-2010
Englewood Hospital and Medical Center Credentials Committee Chair 2014-2015
Englewood Hospital Ambulatory OR committee 2005-2007
Englewood Hospital Foundation Board of Trustees 2008-present
Englewood Hospital OR Committee 2009-present
Englewood Hospital Medical Executive Committee-Member at Large 2011-2012
Englewood Health Medical Executive Committee- 2016-present
Englewood Hospital Physician Partner 2013- present
Englewood Hospital Credentials Committee-Chairman 2014-2015
Englewood Hospital Robotics Committee- 2014-2016
Englewood Hospital Material Management 2014-present
Englewood Hospital Surgical PPE Committee 2014-2017
Englewood Health Medical Staff PPE: 2016-present
Englewood Health Professional Affairs Committee 2018-present
Englewood Health Performance Excellence Steering Committee Chair 2018-2019
Englewood Health Performance Excellence Steering Committee 2020-present
New Jersey Society of Plastic Surgeons: Chairman Out of Network Committee 2010-present
New Jersey Assembly Budget Chair- Health Care Round Table- 2014-2016

Society Office Positions

New York Regional Society of Plastic and Reconstructive Surgery- Parliamentarian 1999-2007
New York Regional Society of Plastic and Reconstructive Surgery-Secretary 2008-2009
New York Regional Society of Plastic and Reconstructive Surgery-Treasurer 2009-2010
New York Regional Society of Plastic and Reconstructive Surgery-Vice President -2011
New York Regional Society of Plastic and Reconstructive Surgery-President Elect 2012
New York Regional Society of Plastic and Reconstructive Surgery-President 2013
New York Regional Society of Plastic and Reconstructive Surgery- Past President 2014-present
New York Regional Society of Plastic and Reconstructive Surgery- Trustee 2014-2017
New Jersey Society of Plastic Surgeon Member at Large-Board of Directors
New Jersey Society of Plastic Surgeons- Treasurer 2012
New Jersey Society of Plastic Surgeons- President Elect 2013
New Jersey Society of Plastic Surgeons- President 2014
New Jersey Society of Plastic Surgeons-Past President 2015-present
Englewood Hospital and Medical Center Medical Staff Secretary/Treasurer 2016-2017
Englewood Hospital and Medical Center Medical Staff Vice President 2018-2019

Charity Participation

New Jersey Special Olympics Silver Medal Sponsor 1998-2001

New Jersey Special Olympics Gold Medal Sponsor 2002-2005

Little Baby Face Foundation- Founding Member, Medical Advisory Board

Englewood Hospital Foundation Board of Trustees- 2008-2017

Training Record/ Teaching Activities

Chief, Division of Plastic Surgery- SUNY-HSC @ Brooklyn

Residency Director-Division of Plastic Surgery SUNY-HSC@Bklyn 1997-2001

Number of Resident per graduating per year= 3

Total Number of resident in program per year= 6

Publications

1. Abramson D.L., Shaw, W.W., Kamat, B.R., Harper, A and Rosenberg, C. "Laser Assisted Venous Anastamoses: A Comparison Study"; Journal of Reconstructive Microsurgery 7(3):199-203;1991.
2. Abramson D.L., Gertler, J.P., Lewis, T. and Kral, J.G. "Crack Related Perforated Gastro-pyloric Ulcers", Journal of Clinical Gastroenterology 13(1):17-19; 1991.
3. Abramson, D.L. and Shaha, A. "Merkel Cell Carcinoma", Surgical Rounds 14(4):321-326; 1991.
4. Abramson, D.L., Kral, J.G., Gertler, J.P. and Lewis, T. "Gastropyloric Ulcers Related to Crack", JAMA 262(5):617-618 (Letter)1989.
5. Whelan, L.R. and Abramson D.L. "Investigative Colonic Motility". Seminars in Colon and Rectal Surgery 1992;3(2):79-87
6. Abramson, D.L. and Shaha, A. "Paraganglioma of the Larynx" Surgical Rounds 1992;15(5):459-464.
7. Toporoff, B., Scalea, T., Abramson, D.L., and Sclafani, S. "Ureteral Laceration Occuring From a Fall From Height: Case Report and Review of the Literature", Journal of Trauma 34(1):164-166:1993.
8. Abramson, D.L., Garzia, F.M. and Webb, H "Benign Metastatic Mixed Salivary Gland Tumor: An Unusual Cause of Small Bowel Obstruction", Surgical Rounds 1992;15(6):555-560.
9. Abramson, D.L., Scalea, T.M., Hitchcock, R., Trooskin, S.Z., Henry, S.M., and Greenspan, J. "Lactate Clearance and Survival Following Injury. Journal of Trauma 35(4)584-89:1993.
10. Whelan, R.L, Abramson, D.L., , Kim, D. S. and Hashmi, H.F.. "Diversion Colitis: A Prospective Study". Surgical Endoscopy 1994;8(1):19-24.
11. Kuzmak, LI, Thelmo, W Abramson, D and Kral JG. Reversible Adjustable Gastric Banding European J Surg. 1994;160:659-571.
12. Abramson, D.L. and Burack, J. "Small Cell Carcinoma of the Esophagus:Surgery and Neo-adjuvant Chemotherapy", Surgical Rounds 1995;18:257-260.
13. Mundlos S., Mulliken J.B., Abramson D.L., Warman M.L., Knoll J.H.M., and Olsen B.R. "Genetic Mapping of Cleidocranial Dysplasiaand Evidence for a Microdeletion in One Family ." Molec Genet 1995;4:71-75.
14. Abramson, D.L., Pribaz, J.J. and Orgill, D.P. "The Use of Free Tissue Transfer in Burn Reconstruction" J. Burn Care Rehab 1996;17:402-8.
15. Gibstein LA, Abramson DL, Sampson CE and Pribaz JJ. "Myofascial Flaps Based on the Dorsalis Pedis Vascular Pedicle for Coverage of the Foot and Ankle" Ann Plast Surg 1996;37:152-7.
16. Abramson, D.L., VanderWoude, D.L. Orgill, D.P. and Pribaz, JJ Traumatic Avulsion and Reconstruction of the Midface. Jour of Cranio-Maxillo Surg.1996;2:61-64.
17. Abramson, D.L.,Marrinan, E and Mulliken, J.B. "Pierre Robin Sequence: Incidence of Velpharyngeal Incompetence" Cleft Pal Craniofac Jour 1997: 34:256-260.

18. Abramson D.L., Janecka I.P and Mulliken J.B. Abnormalities of the Cranial Base in Synostotic Frontal Plagiocephaly, Jour Craniofac Surg, 1996:7:426-428: .
19. Tan S.T., Abramson D.L., MacDonald D.M. and Mulliken J.B. Molding Therapy for Infants with Deformational Auricular Anomalies, Ann Plast Surg 1997:38:263-268.
20. Abramson, D.L., Gibstein, L.A. and Pribaz, JJ. Intra-operative Tissue Expansion for Closure of Large Cutaneous Wounds. Ann Plast Surg 38:380-383:1997.
21. Gibstein, L.A., Abramson, D.L., Bartlett, R.A., Orgill, D.P., Upton, J. and Mulliken, J.B. Tissue Expansion if Children: A Retrospective Study of Complications. Ann Plast Surg 1997:38:358-364.
22. Abramson D.L., Orgill, D.P., Singer, S, Gibstein L.A, and Pribaz, J.J. Soft Tissue Sarcoma of the Extremity; Single Stage Resection and Reconstruction. Ann Plast Surg 1997:39:454-460
23. Abramson, D.L., and Mulliken, J.B. "Moebius Syndrome:Classification and Phenotypes" J Plast Reconstr Surg 1998:102:961-967.
24. Abramson, D.L., Cooper, S, and Wait, R.B. Inverted De-epithelialized Latissimus Dorsi Flap for Correction of Lumpectomy Defects in the Irradiated Breast. Ann Plast Surg 1998:40:664-667.
25. Abramson, D.L. Increasing Projection During Reduction Mammoplasty with Free Nipple Graft. Aesth Plast Surg, 1999:23:282-284.
- 26.. Abramson, DL. Tumescant Abdominoplasty: An Ambulatory In Office Procedure. Aesth Plast Surg 1998:22:404-407.
27. Glasberg, SB,and Abramson, DL. Results of a Trial of Calcium Antagonists to Treat and Prevent Keloid and Hypertrophic Scar formation. J Plast Reconstr Surg. In press
28. Abramson, D.L. Tumescant techniques in Aesthetic Body Contouring. Perspectives in Plastic Surgery 2001:15(2):31-48
29. Pariskar A, Uria T, Har-el G and Abramson DL. Temporomandibular Osteofascial Flap for Head and Neck Reconstruction. J Oral Maxillofacial Surgery 2002:60:619-622.
30. Abramson, DL. Ultrasonic Assisted Abdominoplasty: A Safe and Effective Technique Plast Reconstructive Surgery 2003:112:898-902
31. Abramson, DL. Minibrachioplasty: Minizing Scars and Maximizing Results.. Plast and Reconstr Surg. 2004:114:1631-1634.
32. Abramson, DL, Papp S and Glasberg,SB. Medical Pedicle Wise Pattern Breast Reduction: Plast and Reconstr Surg, 2005:115:1937-1943.
33. Light, D, M.D., Arvanitis,GM, Ph.D., Abramson, DL M.D., Glasberg, SB, M.D. The Effect of Massive Weight Loss after Bariatric Surgery on the Skin and Extracellular Matrix. Plast Reconstructive Surg. 2010:125: 343-351
34. Neinstein,R, Matarasso, A and Abramson, DL. Abdominoplasty and Umbilical Hernia: Concomitant Repair Using Ventralex Hernia Patch. Plast Reconstructive Surg 2015:135:1021-125

Books and Chapters

1. Pribaz JJ and Abramson DL. Nasal Reconstruction with the Auricular Free Flap. Grabb's Encyclopedia of Flaps. 1997. New York pp. 247-251.

Abstracts and Presentations

1. "Patency of Microvascular Venous Anastomoses: An Assessment Based on the Standard Rat Femoral Vein Model", Kenneth C.W. Hui, M.D., William W. Shaw, M.D., Lu Jean Feng, M.D., Nelson Piccolo, M.D., Alice Harper B.A. and David L. Abramson, B.A. American Society For Reconstructive Microsurgery 10/87.
2. Abramson D.L., Gertler, J.P., Lewis, T. and Kral, J.G. "Crack Related Perforated Gastro-pyloric Ulcers: An Urban Epidemic", New York Surgical Society, New York, New York March 8, 1989.
3. Abramson D.L., Hashmi, H. and Whelan, R.L. "Colostomy Closure: Determinants of Hospital Stay and Complications." New England Society of Colon and Rectal Surgery. Newport, Rhode Island April 7-9, 1990.
4. Shaha, A and Abramson D.L. "Surgical Management of Primary Hyperparathyroidism", American College of Surgeons San Francisco, California Oct.7-11, 1990.
5. Abramson, D.L., Hashmi, H.F., Kim, D. S. and Whelan, R.L. "Diversion Colitis: A Prospective Study". Society of American Gastroendoscopic Surgeons. Monterrey, California April 18-20, 1991.
6. Abramson D.L., Gertler, J.P., Lewis, T. and Kral, J.G. "Gastropyloric Ulcers Secondary to Crack Use". Gastroenterology Digest 1991:6:8-9.
7. Kuzmak, Lubomyr I. and Abramson, David. Stomal Adjustable Silicone Gastric Banding-Future Plans: Reversibility Without Laparotomy and Potential as a Laparoscopic Operation. American Society for Bariatric Surgery, New Orleans, La, June 10-13, 1992
8. Abramson D.L., Gertler, J.P. , Lewis, T and Kral, J.G. "Crack and Gastroduodenal Perforation:", Gastroenterology 1992:102:1431-1432.
9. Abramson, D.L., Scalea, T.M., Hitchcock, R., Trooskin, S.Z., Henry, S., and Greenspan, J. Lactate Clearance and Survival Following Injury. Eastern Association Society for Trauma Long Boat Key, Fla. January 13-16, 1993
10. Hitchcock, R., Scalea, T.M., Abramson, D., and Trooskin, S: Hemodynamic Optimization and Survival Following Trauma. Critical Care Medicine 21:158, 1993
11. Hitchcock, R., Scalea, T.M., Abramson, D., and Trooskin, S: "Hemodynamic Optimization and Survival Following Trauma.", Academic Association for the Society of Trauma. San Diego, Calif September 29-31, 1994
12. Abramson, D.L., Pribaz, J.J. and Orgill, D.P. "The Use of Free Tissue Transfer in Burn Reconstruction" American Burn Association Albuquerque, New Mexico April 19-22, 1995
13. Abramson D.L., Orgill, D.P., Pribaz, J.J. and Singer, S.:Soft Tissue Sarcoma of the Extremity; One Stop Shopping. American Association of Hand Surgery Palm Springs, CA January 11-14, 1996.
14. Abramson, D.L.,Marrinan, E and Mulliken, J.B. "Pierre Robin Sequence: Incidence of Velopharyngeal Incompetence" American Cleft Palate/Craniofacial Association San Diego, CA April 24-27, 1996.

15. Abramson, D.L., and Mulliken, J.B. "Moebius Syndrome: Classification and Phenotypes" American Cleft Palate/Craniofacial Association San Diego, CA April 24-27, 1996.
16. Gibstein, L.A., Abramson, D.L. and Pribaz, J.J. " Myofascial Flaps Based on the Dorsalis Pedis Vascular Pedicle for Coverage of the Foot and Ankle" Plastic Surgery Senior Residents Conference. Dallas, Tx April 10-14, 1996.
17. Abramson, DL, Janecka IP and Mulliken JB. "Abnormalities of the Cranial Base in Synostotic Frontal Plagiocephaly" Craniofacial Surgery: State of the Art Symposium. New York, NY March 20-23, 1996.
18. Abramson, DL and Mulliken, JB. "Moebius Syndrome: A Classification System and Its Spectrum" Craniofacial Surgery: State of the Art Symposium. New York, NY, March 20-23, 1996.
19. Abramson DL, Gibstein LA, Bartlett RB, Orgill DP, Miller R, and Mulliken JB. "Tissue Expansion in Children: A Retrospective Series. Northeastern Plastic Surgery Society Washington, D.C. October 1996
20. Glasberg, SB and Abramson, DL. Result of a Trial of Calcium Antagonists to Treat Hypertrophic Scars and Keloids. Amer Soc Plast Reconstr Surg Boston, October 1998
21. Parniskar A, Uria T, Har-el G and Abramson DL. The Use of Vascularized Calvarium for Facial and Palatal Defects. New York Head and Neck Society January 2000.
22. Parniskar A, Uria T, Har-el G and Abramson DL. The Use of Vascularized Calvarium for Facial and Palatal Defects. International Society of Head and Neck Surgery July 2000 San Francisco
23. Neinstein, R, Matarasso, A and Abramson, DL. Abdominoplasty and Umbilical Hernia: Concomitant Repair Using Ventral Hernia Patch. Canadian Society of Aesthetic Plastic Surgery September 2014
24. Cooling Therapy to improve Patient Satisfaction Scores in post operative Spine and Orthopedic Patients, National Association of Orthopedic Nurses Orlando 2015
25. Scheller, T and Abramson, DL Cool Therapy to Reduce Menopause Symptoms American College of Obstetric and Gynecology Nashville, TN May 3-5, 2019

Invited Lectures

1. Department of Pediatrics, Grand Rounds, State University of New York-Health Science Center at Brooklyn. " Vascular Malformations" January 8, 1997
2. Department of Surgery, Grand Rounds, State University of New York-Health Science Center at Brooklyn. "Flaps: Free or Not to Be Free" March 27, 1997
3. Division of Gynecologic Oncology, State University of New York- Health Science Center at Brooklyn, "Reconstruction following Ablative Gynecologic Surgery. November 18, 1997
4. Division of Plastic Surgery, Lenox Hill Hospital, " The Use of Calcium Channel Blockers for the Treatment of Hypertrophic Scars and Keloids" January 15, 1999.
5. Department of Pediatrics, Lenox Hill Hospital, " Cleft Lip and Craniofacial Anomalies: Diagnosis and

Treatment” February 25, 1999

6. Department of Otolaryngology, State University of New York- Health Science Center at Brooklyn, ”New Techniques in Facial Rejuvenation” July 22, 1999
6. Department of Surgery Grand Round, State University of New York- Health Science Center at Brooklyn, “The Reconstructive Ladder” March 31st 2000.
7. Division of Gynecologic Oncology. State University of New York- Health Science Center at Brooklyn, “Reconstruction of Complex Truncal Defects”
8. Abramson, DL. Minibrachioplasty: Minimizing Scars and Maximizing Results Advances in Aesthetic Plastic Surgery: The Cutting Edge V New York November 12-16, 2004
9. Abramson, DL. Post Bariatric Body Contouring. Englewood Hospital, Englewood, New Jersey March 30, 2005
10. Abramson, DL. Circumferential Body Lift. Grand Rounds Manhattan Eye Ear and Throat Hospital April 18, 2005
11. Abramson, DL. Post Post Bariatric Body Contouring. Grand Round Lenox Hill Hospital April 24, 2005.
12. Abramson, DL and Glasberg, SB. Medical Pedicle Breast Reductions(Live Surgery) Advances In Aesthetic Plastic Surgery The Cutting Edge VI Symposium, New York, November 12-15, 2006
13. Abramson, DL. Post-Bariatric Breast Surgery. Advances In Aesthetic Plastic Surgery The Cutting Edge VI Symposium, New York, November 12-15, 2006
14. Abramson, DL and Glasberg, SB. Medical Pedicle Breast Reductions(Live Surgery) Advances In Aesthetic Plastic Surgery The Cutting Edge VII Symposium, New York, November 11-14, 2008

Research

Gemstone Bioscience- Use of Briagen for closure of post Moh’s Defects-

Christie Medical- The use of near infrared camera to assess flap viability following Mastectomy and Reconstruction

Nanohealth USA- Cool Therapy for the reduction of menopausal systems- follow up study(additional 25 patients)

Nanohealth USA- The use of a cooling therapy to reduce edema and improve recovery following Synvisc injections.

Nanohealth USA- Temperature modulation to improve sperm count and motility

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Subsection 4.9.3 – Oversight

The Medical Director will coordinate with departmental leadership of every phase of MMTC operations to ensure patient and product safety in service to the MMTC's capacity as a medical organization. The Medical Director will work closely with the Dispensing Director, Inventory Managers and the Director of Security and Safety. The Dispensing Director and Director of Security and Safety are responsible for day-to-day operations, staffing schedules, point of sale, inventory tracking and processes to mitigate the risk of diversion. With team members responsible for the efficiency and profitability of the business, the Medical Director is solely focused on patient care and quality of the dispensing experience.

1. Medical Director Scope of Responsibilities, Supervision, and Oversight: In each dispensary location, the Medical Director will supervise each Manager and two Assistant Managers in their patient management tasks. The Medical Director will be directly focused on the following key patient-facing activities including:

1. Vetting new employees and training them on how to recommend medical cannabis products, interact with patients and monitor responses to medical products.
2. Reviewing final product testing results from CMTLs for each tested sample of each retail batch.
3. Providing one-on-one immersion sessions for each new patients before any product is dispensed. Immersion sessions will be offered through a telehealth portal that is HIPAA compliant.
4. Reviewing product complaints, adverse events and overseeing any recall procedures.
5. Patient Recordkeeping and HIPAA Compliancy.

The Medical Director will report directly to the Medical Advisory Board, which includes a variety of licensed physicians with a broad range of cannabis experience. The Board will meet quarterly, whereby the Medical Director will present operations reports, evolution in medical cannabis science and make suggestions on how to improve the patient experience.

New Patient Immersion Session

Upon each patient's first visit, the patient will undergo an immersion session with the Medical Director. The purpose of this session is to counsel registered patients and certified caregivers regarding the safe use and storage of medical marijuana products as well as the legal rights and obligations related to the use and storage of medical marijuana. Such counseling shall include information related to safe techniques for proper use and storage of marijuana oil and other derivative products and for the proper disposal of flower and derivative final products in a manner which renders the products nonrecoverable.

The Medical Director will provide the qualified customer with educational literature outlining the various cannabinoids and terpenes found in medical marijuana and low-THC cannabis, a reference sheet listing several studies that the Medical Director has found informative for new patients, a symptom rating scale for patients to self-assess, along with a survey about the patient's previous use and comfort level with medical marijuana and low-THC cannabis. During this session, the Medical Director will ask about the patient's symptoms, needs, education levels and address all questions/concerns. The consultation will include a discussion of the application or consumption of medicinal marijuana and low-THC cannabis, which product types or delivery devices are recommended for the patient and education to ensure each patient understands how to administer the cannabis safely and properly through the recommended methods. The Medical Director will then provide the patient with a journal for tracking results, benefits, and symptoms.

The Medical Director will inform each new patient that the Medical Director will need to personally approve the first two orders of medical marijuana and low-THC cannabis products before they are dispensed, and that the patient must provide the Medical Director feedback after the use of the products dispensed during each of these orders.

The Medical Director will create files for each new patient via a HIPAA compliant platform. The Medical Director is responsible for ensuring that all patient information is kept up-to-date and verifying any changes in a patient's address, status, or eligibility. The Medical Director will also be responsible for ensuring staff properly verifies patient and caregiver enrollment in the Medical Marijuana Use Registry and proper staff protocols for ensuring each transaction is within the daily, 35-day, and 70-day dosing and supply limits and comports with prescribing physician certification.

2. Lapse in Medical Director Role: The applicant will invite 2 individuals on the Medical Advisory Board who hold active, unrestricted licenses as a physician under Chapter 458 F.S. or as an osteopathic physician under Chapter 459 F.S. These individuals will have successfully completed a 2-hour course and subsequent examination offered by the Florida Medical Association or the Florida Osteopathic Medical Association that encompasses appropriate safety procedures and knowledge of low-THC cannabis, medical cannabis, and cannabis delivery devices before commencing work. These individuals have been identified during the interview phase for the Medical Director role and have shown interest and a commitment to joining the applicant in this capacity. They will interface directly with the Medical Director during quarterly board meetings and by supervising the Medical Director, they will be intimately familiar with the activities of each dispensary facility. If a change in the Medical Director occurs, all patients will be notified of the change and new immersion sessions will be offered during the new Medical Director's first four weeks of employment.

3. Ongoing Education: The Medical Advisory Board is responsible for outlining a recurring education curriculum for the Medical Director. The Medical Advisory Board is responsible for organizing peer reviewed studies on the medical cannabis science and providing them to the Medical Director every two weeks. These “education briefs” are the core responsibility of the Board, in addition to supervising and supporting Medical Director activities.

Additionally, the Medical Director will foster open communication channels with the Florida Medical Association and the Florida Osteopathic Medical Association, retaking classes on a bi-annual basis to stay up to date on appropriate safety procedures and knowledge of low-THC cannabis, medical cannabis, and cannabis delivery devices.

Lastly, the Medical Director will sign up for regular updates from the following institutions:

- [Cannabisscience.com](https://cannabisscience.com)
- [Cannabissciencetech.com](https://cannabissciencetech.com)
- The Federal Substance Abuse and Mental Health Services Administration
- National Institute of Health

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Subsection 4.9.4 – Managing Conflicts of Interest

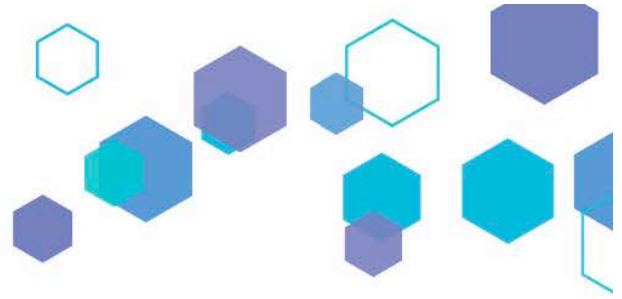
Applicant's Medical Director will not engage in behavior that creates, or may create, a conflict of interest with ordering physicians, including, but not limited to, kickbacks. Applicant's Medical Director, employees, owners, and managers will participate in a mandatory ethics program based upon a written Code of Business Conduct and Ethics ("CBCE"). The CBCE will ensure that all stakeholders in Applicant's operations conduct themselves with the highest degree of personal integrity and a commitment to ethical principles. The CBCE will strictly prohibit conflicts of interests, including but not limited to conflicts involving ordering physicians. The Medical Director will be required to participate in a biennial ethics review, which will review the individual's personal background and business interests to ensure compliance with Florida's ethics rules and regulations, particularly the need to avoid conflicts of interest. At the time of the biennial ethics review, all employees, owners, and managers, including the Medical Director, will complete a comprehensive acknowledgment form requiring each individual to declare that they have no conflicts of interest involving prescribing physicians and that they will not offer financial or any other form of incentives to any prescribing physicians to refer patients to the Applicant. Currently, Applicant's Medical Director, Dr. Abramson, is an investor and advisor with Marijuana Doctor, a medical practice in Florida which provides recommendations for medical marijuana on behalf of its patients. Upon issuance of a MMTC permit from the OMMU, Dr. Abramson will immediately notify Marijuana Doctor that he can no longer serve in any advisory capacity role the organization. In addition, Dr. Abramson will place his investment interest in Marijuana Doctor into a blind trust which will stipulate that he will have no knowledge of the holdings of the trust and no right to intervene in its management. Alternatively, at OMMU's direction, Dr. Abramson will divest himself of all interests in Marijuana Doctor.

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Subsection 4.9.5 – Medical Director Acknowledgment and Certificate of Course Completion



FORM 4: MEDICAL DIRECTOR ACKNOWLEDGMENT

I, David I abramson, have consented to be employed as the medical director for Alamanda Farms LLC, an applicant for MMTC licensure pursuant to section 381.986, F.S. I have successfully completed the 2-hour course and examination for medical directors offered by the Florida Medical Association or Florida Osteopathic Medical Association concerning the requirements of section 381.986, F.S. I understand and agree that, upon licensure by the Department, I am responsible for supervising the activities of the MMTC. I understand that if I knowingly make a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty, that I may be found guilty of a misdemeanor of the second degree, punishable as provided in sections 775.082 or 775.083, F.S.

Name (Printed):

David I abramson

Signature:

David I abramson

David I abramson (Apr 11, 2023 21:37 EDT)

Florida MD or DO License #:

ME 156947



Florida Medical Association

Certifies that

David L. Abramson

has participated in the enduring material titled

Florida Medical Marijuana Course for MMTC Medical Directors

on 3/24/2023 7:45 AM Eastern

and is awarded 2.00 AMA PRA Category 1 Credits™ (Enduring Material)

The Florida Medical Association is accredited by the Accreditation Council for Continuing Medical Education to provide continuing medical education for physicians.

The Florida Medical Association designates this enduring material for a maximum of 2.00 AMA PRA Category 1 Credits™ (Enduring Material)

Physicians should claim only the credit commensurate with the extent of their participation in the activity.

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Section 4.10

Personnel

Subsection 4.10.1 – Personnel Qualifications

1. Organizational Structure: Applicant's organizational structure is hierarchical. Each employee has a supervisor. Supervisors are trained to adopt a mentorship approach to staff management, preparing staff at all levels for increased responsibilities and performance and upward mobility in the burgeoning cannabis industry. The chain of command connects multiple management levels within the organization with weekly all-hands meetings and supervisor summaries sent out weekly.

2. Necessary Positions Already Retained

a. Chief Executive Officer (CEO): Core responsibilities include the direction of regular MMTC operations, regulatory compliance, and staff management. Primary duties include cashflow management, overseeing SOP revisions in accordance with State and Federal changes in regulations, and driving growth to meet patient needs.

Individual Filling the Position: Jason Webski has served as the CEO of medical cannabis cultivation, processing, and dispensary facilities across several states for over 5 years. Jason regularly interfaces with cannabis regulatory bodies, providing updates to staff and stakeholders, and participates in customer feedback sessions to facilitate growth in the medical cannabis space. Jason has secured funding exceeding \$20,000,000 for construction and operating costs for advanced cannabis facilities. Jason directs cashflow projection and budgeting analysis & exercises to ensure facilities can operate successfully in the long term.

b. Chief Financial Officer (CFO): Core responsibilities include overseeing all facets of accounting, finance, banking, insurance, payroll, human resources, and setting up and maintaining an accounting system. Additionally, the CFO signs off on state commission reporting, bank compliance, cash management compliance, and local, state, and federal tax compliance.

Individual Filling the Position: Carl Allison has over 27 years of financial, accounting, budgeting, and forecasting, strategic planning, human resources, and compliance experience. Carl has served as the CFO of medical cannabis cultivation, processing, and dispensary facilities for over 4 years, managing tax compliance including 280E, cashflow, payroll, human resources and banking. Carl has an MBA from California State University.

c. Chief Operating Officer (COO): Core responsibilities include managing cultivation and processing operations to ensure regulatory compliance, workers safety, and mitigating the risk of diversion of sensitive product. COO is the author of each operating procedure and is intimately familiar with OSHA requirements, Florida statute and FDA good manufacturing guidelines. COO is responsible for maintaining an active Food Permit in accordance with Chapter 5K-11. COO takes a leadership position on any pest, mold or mildew outbreaks and overseeing any complaint or recall procedures. During the licensing, planning, construction, and authorization phases of Applicant's early period as a Florida MMTC, the Chief Operating Officer will also serve concurrently as Director of Security & Safety (DSS). In that capacity, the COO will be responsible for establishing Security, Accountability, & Workplace Safety Standard Operating Procedures in addition to overseeing all security-related contracting, construction, and installation processes.

Individual Filling the Position: Blake Costa has over 12 years of military experience in the U.S. Marine Corps and the U.S. Army National Guard. Blake's roles in service included securing U.S. Embassies as a Marine Guard in Pakistan, Italy, Afghanistan, and over a dozen other countries, as well as supporting the Department of State and the White House on a variety of missions. Blake currently serves as the COO for 5 cultivation, processing and dispensary cannabis facilities. Blake has integrated many of the practices used at the Federal level in embassies across the globe to protect patients, employees, medicine and the facilities. Blake has pioneered introducing facial

recognition into the cannabis industry, allowing individual identification to be confirmed with the state DMV database before they even enter a facility. Additionally, Blake is well versed in all OSHA requirements and specializes in mitigating the risk of diversion while enforcing a safe work environment.

d. Controller: Controller supports the CFO in a wide variety of administrative and financial functions. Primary responsibilities include reconciling sales at the end of each day for each active dispensary, payroll, tax reporting and health insurance management.

Individual Filling the Position: Matt Horoski holds a Bachelor of Science in Accounting with a Forensic Accounting Specialization and is currently pursuing a Professional MBA through the University of South Carolina. He manages payroll, accounting and HR for a multi-state cannabis company operating cultivation and dispensary locations.

e. General Council & Director of Government Relations (GC): The GC is responsible for interfacing with regulatory bodies and local officials to ensure operational compliance. Each department utilizes the GC as a resource for a final regulatory compliance consideration. The GC keeps the Medical Director and COO up to date on any changes in regulatory or legal requirements and performs compliance audits at random each month. The GC manages general administrative tasks as well.

Individual Filling the Position: Bryan Lucas has led government relations and the legal department for a multi-state cannabis company for over 1 year. Prior to entering the cannabis industry, Bryan held a clerkship at the Superior Court of New Jersey, Essex County, before entering private practice as an attorney. Bryan then entered public service by serving first as a New Jersey Deputy Attorney General, and later as Special Assistant to the Director at the New Jersey Office of the

Attorney General, Division of Law. Bryan is a Captain in the United States Army Reserve, where he serves as a Judge Advocate. a Bryan holds a J.D. from Seton Hall Law School.

f. Medical Director (“MD”): The core responsibilities of the MD include monitoring and advising all dispensing activities for the MMTC. Each Dispensary Technician, Assistant Manager, Inventory Manager and Dispensary Manager are onboarded by the MD. The MD conducts immersion sessions with each new patient, where he will affirm the registration and their prescribing physician’s certification in the Medical Marijuana Use Registry. The MD will go through a detailed assessment of the patient’s symptoms and discuss the treatment options available, assisting the patient in determining which product and means of administration may best suit both the patients’ medical needs and personal comfort. MD will provide guidance on inventory purchasing, review CTML testing and conduct quarterly training for all dispensing employees. The MD will assess conditions regarding patient safety on (1) Whether the MMTC remains capable of producing safe and effective final products (2) Whether the MMTC remains capable of producing a sufficient supply of such final product to satisfy demand (3) Whether all MMTC facilities continue to maintain a safe physical environment. If the MD deems the MMTC unable or unlikely to satisfy any of the stipulated criteria, the MD may instruct an appropriate Director or Directors to undertake corrective actions.

Individual Filling the Position: Dr. David L. Abramson, M.D. Dr. Abramson is a Board-certified Plastic Surgeon with 35 years’ experience practicing, researching, and teaching medicine. Dr. Abramson began his medical career in 1988 after graduation from the New York University School of Medicine. Since 2009, he has been Chief of Plastic Surgery at Englewood Heath. Pain management plans is an important element of patient care in such instances, and Dr. Abramson

has extensive practical experience and continuing education relating to formulating and monitoring pain management treatment strategies, including the use of medical marijuana.

g. Dispensing Director (DD): The DD drives the culture of each store while maintaining oversight across the MMTCs entire network of dispensing locations. While the Medical Director is focused on patient relations and review of medicine in inventory, the DD is focused on daily operations associated with each dispensing location manager, while routinely visiting each location for in-person observation and mentorship. DD is responsible for approving weekly staffing schedules, workers safety, cash management, point of sale systems, and inventory management systems. DD reviews weekly discounts and compassionate use plans, adapting to market needs. DD works with MD on staff training and oversees workers safety and OSHA compliance in dispensing facilities.

Individual Filling the Position: Peter Franklin has managed multiple licensed dispensary facilities across Maryland, Maine, Rhode Island, and New Jersey at the same time for the past 4 years. He oversees design of dispensary facilities to facilitate a comfortable patient experience and is intimately involved in assuring all SOPs properly integrate the regulatory requirements of each state. He hosts daily meetings with Dispensary Managers at each location, analyzing inventory, HR related issues, reviewing customer complaints, and monitoring key metrics to evaluate the efficiency of each dispensary, including transactions times and average visits per month per patient. Peter holds an MBA from Seton Hall University.

h. Cultivation Director: The Cultivation Director (“CD”) is responsible for overseeing all day-to-day operations within the cultivation facility. CD’s primary responsibilities are plant health, inventory tracking, and workplace safety. CD oversees the entire plant life cycle from mother to harvest and is responsible for yield and quality benchmarks, gauged by CMTL reports and patient

feedback. The CD is charged with important oversight and accountability functions, which include conducting reviews of all procedural checklists and recording logs required by the Standard Operating Procedures for Cultivation. The CD will also conduct daily and weekly audits of inventory to ensure all plants and plant materials in the cultivation stage are accurately tracked by weight and location in the seed-to-sale tracking system. The CD oversees all sensitive waste disposal. The CD and must designate a safety officer for each sub-department and hosts monthly safety committee meetings. CD is responsible for implementing pest mitigation protocols and tracking yields and plant quality in the seed-to-sale tracking system. Ultimately, the CD is responsible for ensuring a safe workplace environment with healthy, thriving plants and knowledgeable, accountable staff members.

Individual Filling the Position: Jason Tucker has served as head of cultivation for a licensed medical cannabis indoor cultivation & processing facility in Rhode Island for 4 years. Managing over 3,000 plants, Jason has maintained quality control, pest mitigation, and sanitation & hygiene procedures, while directing all other operations regarding plant health and laboratory testing analysis. He has successfully ensured consistently high yields, resource efficiency, and a safe & sanitary working environment. All regulatory inspections conducted during his tenure have been deemed as exceeding regulatory standards. Prior to this experience, Jason worked and studied for two years as a pupil to a horticulture master with 20 years' experience working in commercial greenhouses. Jason Tucker holds a BA in Recreation & Leisure Studies from Southern Connecticut State University and has taken post-graduate courses in Fundamentals of Cannabis from Green Flower.

i. Agricultural Advisor: Experienced horticulture expert who creates a bridge between cultivation and traditional agriculture techniques. The Agriculture Advisor works with the CD to analyze

infrastructure, equipment and methodology to drive increases in quality. The Agriculture Advisor is tasked with research and reporting of innovations in modern agriculture, suggesting new systems to increase yield and purity. The Agriculture Advisor is also responsible for crossbreeding new strains based on patient feedback.

Individual Filling the Position: Jason Jennings has directed Alamanda Farms' hemp cultivation operations on the premises of Applicant's proposed cultivation facility for two years and overseen operations at the same property since 2007. In that time, he has successfully raised poultry for the Pilgrim's Pride brand, directed a large-scale blueberry cultivation & processing operation, raised cattle, and cultivated hay for wholesale to agricultural producers in Florida. Prior to immigrating to Florida from Trinidad, Mr. Jennings farmed cocoa and coffee before pioneering a revival in no-grazing dairy farming strategies. Most recently, as a Florida DACS-licensed hemp cultivator, Mr. Jennings employed advanced agricultural processing techniques to distinguish his product in a saturated market. Mr. Jennings constructed a custom hemp processing facility utilizing equipment and processes of his own qualified design. This system enabled Mr. Jennings to turn surplus hemp biomass into marketable products formulated to relieve symptoms of muscle pain, arthritis, and insomnia.

j. Post-Production Manager: The Post-Production Manager ("PPM") oversees processing staff, performing daily checks on drying and curing operations, including moisture level readings, maintaining proper records and schedules for each batch, and implementing protocols to ensure no mold or mildew is present in the product. The PPM participates in SOP revision for post-production stages of the supply chain and is responsible for inventory tracking, including recording accurate wet and dry weights and quality of product in the seed-to-sale tracking system, reporting to the COO for weekly reconciliations. The PPM will be responsible for scheduling the extraction

of marijuana oil and further processing into other derivative products by strain, including medical marijuana strains, low-CBD cannabis strains, and final product type. The PPM is also responsible for ensuring the proper packaging and labeling for all final products, arranging for CMTL collection of property tracked samples of each retail batch, and arranging for distribution of final products to dispensing locations once CMTL testing confirms each retail batch sample is within Acceptable Limits. The PPM will work directly with the CD on batch release, including testing and labeling requirements, requiring a signoff from the COO.

Individual Filling the Position: Matthew Belair is a seasoned cannabis facility manager who has led post-production operations for a licensed cultivation facility for 3 years. He leads a team of 4, overseeing the harvesting of 100+ lights on a bi-weekly basis, mitigating crop loss and driving yields. Matt has developed unique curing and burping systems on a per strain basis that results in extremely high-quality product. He manages a team that produces a range of edibles and concentrates, overseeing trimming, extraction, and refinement personnel.

k. Construction Manager (“CM”): The CM is responsible for coordinating and managing the planning, design, and construction of retail and cultivation facility projects. The CM interfaces with planning and zoning committees to secure certificate of occupancy.

Individual Filling the Position: David Werdelin has managed all construction related processes from permitting through certification of occupancy and coordination of owners, engineers, architects, contractors, and internal stakeholders for cannabis companies for 2 years. Before entering the cannabis sector, he spent 3.5 years working with a commercial general contractor where focus ranged from multifamily residential to historic restoration. Before this, David spent 3 years working in-house with a large manufacturing business, Harvey Perform Company, to function as the project manager for an 80,000 sq. ft. state-of-the-art CNC facility.

3. Necessary Position to be Filled After Licensure:

(i) Dispensary Managers (“DM”): Each dispensary has a respective DM who is responsible for day-to-day management of the dispensary facility. Each DM will work closely with the Dispensing Director, responsible for reporting inventory tracking, point of sale reports, monitoring patient feedback and managing HR issues for their respective dispensary. DMs are responsible for hiring and training, in conjunction with the Medical Director and Dispensing Director, all staff for each dispensary and monitoring their performance. DMs are involved in ordering inventory from the Cultivation & Processing facilities and are responsible for ensuring proper storage of all products. DMs work with the Dispensing Director to develop innovations to enhance the patient in-store experience.

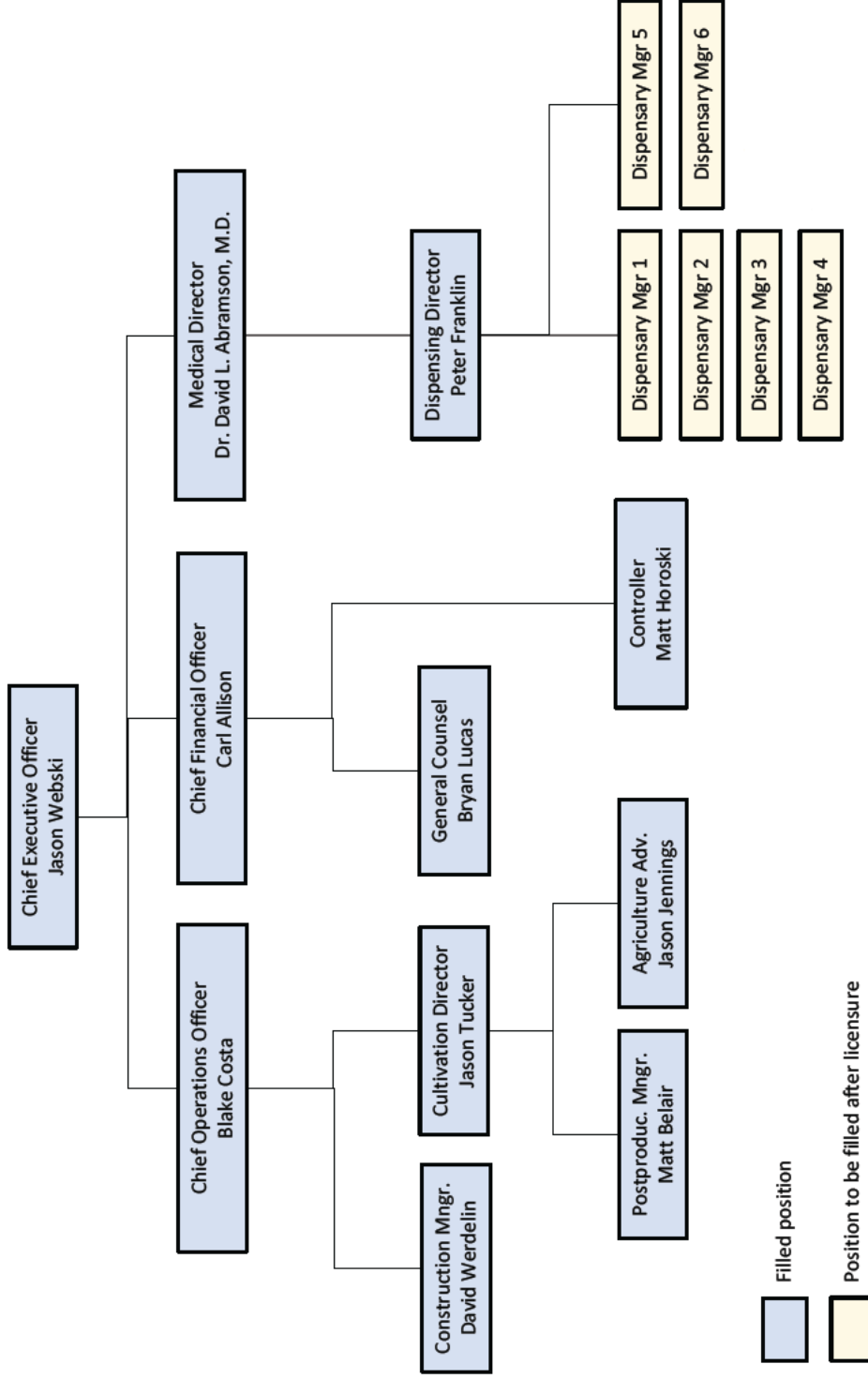
4. Hiring Plan for Necessary Positions Not Filled: Applicant’s Community and Recruitment Liasson is James Smith, previously a career navigator with the Mayor’s Office of Employment Development in Baltimore, Maryland. James has placed over 400 rehabilitated former offenders in gainful employment James has developed a robust Employment Opportunity Creation & Recruitment Plan in coordination with strategic partners to ensure a representative inclusion of minority persons, veterans, and individuals facing serious economic hardship in the applicant’s workforce. For each position being filled, the following goals and benchmarks must be adhered to (1) Identify 15 potential candidates for each new position (2) Include 2 employee referrals for each new position (3) Include 4 candidates that are Veterans as defined in 295.187, F.S. (4) Include 5 people that are minorities as defined in section 288.703, F.S. (5) Include 2 applicants that have a marijuana related offense. Applicant will utilize the Florida workforce system with the Florida Department of Economic Activity to access a large majority of potential candidates. Additionally, a partnership is being pursued with CareerSource Central Florida (CCF). CCF curates’ local talent

for high-demand industries, and offers one hour certification classes for ex-offenders. Lastly, applicant will be reaching out to the American Job Center of Florida. American Job Centers were established under the Workforce Investment Act and reauthorized in the Workforce Innovation and Opportunities Act of 2014. The centers offer training referrals, career counseling, job listings, and similar employment-related services. These partnerships, led and executed by James, will provide applicant a continuous channel of minority persons, veterans, and individuals from socio-economically disadvantaged areas. To meet its goals, applicant has created the aggressive annual schedule, including (1) 1 in-person recruitment event per year (2) 1 in-person career presentation per year (3) 1 localized advertising campaign launched annually across various mediums and platforms and (4) Attend 3 job fairs annually.

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4.10.1 - Addendum



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Subsection 4.10.2 – Drug Free Workplace

The applicant maintains a strict alcohol and drug-free workplace policy, including:

1. Patient Consumption: Consumption of medical marijuana inside or around the Facility is strictly prohibited regardless of its form. Employees should be vigilant to ensure no patients consume medical marijuana on or around the Facility. All patients will be made aware of this policy before being allowed access to the Facility and following any purchase of medical marijuana. In the event of patient consumption of medical marijuana in or around the Facility, the Security Guard or Dispensary Manager on site must be notified immediately. The Security Guard or Manager will log notes from the incident in the patient's profile and the Department will be notified. The security guard will be the only person to confront an individual who is consuming medical marijuana outside/inside the Facility.

2. Staff training: During each staff onboarding, employees undergo a security and safety module led by the Chief Operating Officer. Included in the module it is clearly communicated that while on applicant premises and while conducting business-related activities off premises, no employee may use, possess, distribute, sell, or be under the influence of alcohol, marijuana, or illegal drugs. Each employee will sign an acknowledgement after the module agreeing that breaching this protocol will result in immediate termination and notification to the Department.

3. Complaints: If any employee receives a complaint that a staff member is intoxicated, he/she must escalate the complaint to the Dispensary Manager immediately. Dispensary Manager will investigate and take the necessary steps.

4.Accountability: All employees are expected to report to the Medical Director if they suspect another employee is consuming or intoxicated at the facility. Medical Director and Dispensary

Manager will investigate and take the necessary steps. The Medical Director will offer substance abuse guidance if necessary.

5. Employee Property: Employees will proceed directly to the employee break room with their bags and secure them in a provided locker for the duration of their shift. At no time will employees be allowed to have their bags in any area of the Facility that is used to store, display, cultivate, process or package medical marijuana.

6. Unlawful Transactions: Applicant and staff must ensure that no unlawful sales transactions are permitted or tolerated in accordance with state laws and regulations. All employees will report any diversion or unlawful sales witnessed or suspected to the Dispensary Manager immediately.

7. Employee Assistance Program (EAP): The company may provide an Employee Assistance Program (EAP) to help employees with substance abuse issues. The EAP is a confidential resource that provides assessment, counseling, and referral services for employees seeking help for substance abuse problems.

8. Prescription Medication: Employees who are legally using prescription medication that may impair their ability to perform their job duties safely and effectively are required to disclose such use to their supervisor or human resources representative. The Medical Director will consider reasonable accommodations for employees who are using prescription medication in accordance with applicable laws and regulations.

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Subsection 4.10.3 – Personnel Training

All Dispensary, Processing, and Cultivation employees, including management, will receive onboarding and training manuals, the Employee Manual, and attend orientation four weeks prior to commencing employment. All employees must be 21 years of age or older and have passed a background screening pursuant to 381.986(9) F.S before beginning onboarding. Records of each employee's training history will be maintained recorded and stored for 2 years. The following outlines a training curriculum to be conducted prior to the employee commencing work, which is in accordance with 381.986, F.S., and Department rules.

Applicant is aware that simply reading the Operations Manual does not constitute a sufficiently comprehensive training program to ensure regulatory compliance and patient satisfaction. For this reason, Applicant employs a strategy of module-based training. Each module covers a single topic in-depth and will be tracked/documented for reporting and management purposes. Each module is presented via an in-person PowerPoint presentation by leadership. Each module concludes with a review of relevant Standard Operating Procedures. Employees are tested after each module and must achieve a minimum score of 90% on each test prior to commencing work at the facility. If an employee fails a test after a module, he/she will be provided with additional support from their immediate supervisor.

The Medical Director, the Dispensing Director, Cultivation Director, Chief Financial Officer, and the Chief Operating Officer will provide all relevant and adequate training for each employee involved in company operations. All required training will be documented, along with a signed statement by the employee indicating the date, time and place where the training occurred as well as the topics discussed, including the name and title of presenters.

Training modules include:

1. Human Resources.
2. Compliance, Regulation and Law.
3. Confidentiality and HIPAA.
4. Worker Safety & Incident Management.
5. Security and Mitigating Diversion.
6. Inventory Controls.
7. Drug-free Workplace.
8. Recordkeeping and Reporting.
9. Sanitation.
10. The Plant Lifecycle.
11. FDA Good Manufacturing Practice.
12. Environmental Controls.
13. Integrated Pest Management.
14. Patient Education.
15. Point of Sale.
16. Recall and Withdrawal.

Training is leadership led and supported with educational videos produced internally. A synopsis of each section includes:

Human Resource and Standards of Conduct: Human Resources incorporates professional conduct, ethics and philosophies for the organization. Human Resources will maintain records regarding benefits, pay, vacation and sick days, chain of commands, criminal background checks, harassment in the workplace policies, drug and alcohol policies, schedules, hours worked, overtime and various corporate policies.

Compliance, Regulation and Law: All personnel will receive a thorough summary of the legal and regulatory requirements in the state of Florida and specifically related to their duties in the facility. All compliance aspects of the Onboarding and Operations Manual will be highlighted throughout various training sessions. Employees will receive updated quarterly training to ensure continued regulatory and operational compliance.

Confidentiality, Privacy Protection, and HIPAA: The Medical Director will provide training for each employee concerning all relevant aspects of the Health Insurance Portability and Accountability Act (HIPAA). Confidentiality and privacy protection will be highlighted in the HIPAA training to provide employees with a comprehensive understanding of their responsibilities toward safeguarding patient records. Information Technology will be covered as well by the Director of Security and Safety.

Worker Safety & Incident Management: Training is focused on employee, facility, patient and product safety. The training will be work-area-focused and address all items in the Safety Plan, which covers OSHA regulations. Training will additionally cover unsafe product storage conditions and requirements for reporting potentially unsafe medical cannabis products to appropriate supervisors. Other topics of discussion include personal protective equipment, fire, evacuation procedures, medical, first aid certification, hazardous materials safety data sheet, robbery, workplace violence, and emergency weather situations.

Security and Mitigating the Risk of Diversion: In this module, the training will focus on employee, facility, patient, and product security. All employees will be trained to identify indicators of diversion, suspicious behavior, and parking lot surveillance. Training will also familiarize employees with security features and technology, including the surveillance system, alarm system, and access control system and the security protocols for the transportation and storage of medical cannabis products. Sensitive waste disposal is covered by the COO as well.

Inventory Control and Electronic Tracking Systems: The employee will undergo a thorough immersion into 119.071(3) from seed to sale, including tracking each plant through every stage of the lifecycle. Training includes audits and protocols to compare the point of sale and inventory control reports. Included in this module are labeling and packaging procedures.

Alcohol and Drug-free Workplace Rules and Regulations: The Director of Security and Safety will explain and underscore that no alcohol, cannabis, or the use of any drug will be permitted on the premises. Acknowledgements will be signed.

Recordkeeping and Reporting: The Dispensing Director and Cultivation Director will walk through all the forms used in the facility and ensure the new employee understands the importance of maintaining accurate and diligent records in such a tightly regulated industry. Additionally, all reportable events per regulatory requirements will be addressed.

Product Handling and Sanitation: The Product Handling and Sanitation module is taught by the Dispensing Director and Cultivation Director, who teaches the importance of operating a clean, sanitary facility while also underscoring the responsibility of every employee to maintain high quality hygienic practices. Additionally, PPE and sanitation is discussed along with the appropriate tools used in the facility and protocols to sanitize the tools following use.

The Plant Lifecycle: Training for employees working in the cultivation facility is department focused and includes proprietary cultivation methods, formulas, equipment and forms/logs.

FDA Good Manufacturing Practice: All employees will receive immersion sessions into Current Good Manufacturing Practice regulations by AIB International, a world-renowned Food Safety partner. Processing employees will receive additional training from the Cultivation Director and Postproduction Manager on sanitation, hygiene, safe storage, and all relevant SOPs.

Environmental Controls: Training for employees will emphasize the correlation between controlling environmental inputs and producing high quality product. The training will also review the general requirements for the production of high-quality medicine.

Integrated Pest Management: The training will cover pest management protocols, along with providing images of both pests and beneficial insects for identification purposes, and the steps

required following discovery of pest pressure. Heavy emphasis is placed on pest scouting inspections and reporting for pests that endanger or threaten the horticulture or agriculture of the state.

Patient Education and Counseling: While only the Medical Director may consult with a registered patient, it is still critical for every employee to be familiar with the protocols and restrictions associated with patient management. Applicant will train all employees on the brands, forms, product categories, available medical research, and the therapeutic effects of using medical cannabis. Training will also emphasize employee professionalism.

Point of Sale Training and Dispensing Errors: Education videos and walkthroughs are provided by the point-of-sale vendor, along with demos and education pamphlets. Mock transactions are led by the Dispensing Director on accurately dispensing cannabis and preventing of dispensing errors, quality assurance plans and steps to rectify dispensing errors.

Recall and Withdrawal: The COO and Medical Director will discuss in detail the importance of handling every complaint with the appropriate processes associated with categorizing and reporting those complaints. Additionally, this module includes adverse event reporting, understanding the chain of command and following the proper procedures when Recall is triggered.

Performance Reviews

Employee success will be discussed during periodic employee performance reviews, which will take place quarterly during their first year of employment, and every 6 months thereafter. This appraisal of performance is intended to inform employees of their progress and highlight areas where there are opportunities for improvement. An action plan for performance improvement will be utilized when below average scoring is tabulated on any section of an employee's review forms.

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Section 4.11

Diversity Plan

Subsection 4.11.1 – Diversity Plan

Applicant has prioritized developing strategic partnerships to promote a strong workforce, reflective of the diverse communities in which it serves. Applicant has a track record of working with community leaders, activists, and educators to create a culture of inclusion and have hired and trained an inclusive workforce in several states.

1. Promoting representation of minority persons and veterans in the workforce.

Applicant has fostered a culture and hiring plan to promote representation of minority persons and veterans. The first step in promoting diverse representation in the workforce is to implement systems within the management team to ensure there is no bias that could negatively affect the hiring goals. Therefore, Applicant's plan includes a range of research-based protocols to standardize the hiring process, including:

- Eliminating Bias: Conduct blind screenings to minimize unconscious biases in the resume review process.
- Tracking Diversity in the hiring process: Multiple hiring managers provide input and perspective, and all hiring data is analyzed to ensure accountability. Applicant has established metrics to ensure the talent pipeline is representative of the hiring goals.
- Mentoring Program: During the employee onboarding and training process, all employees will be assigned a mentor from Leadership to provide a resource for new employees.
- Feedback and Open Communication Pathway: Applicant has an open-door policy where all members can speak at any time regarding resolution of job-related matters. Applicant welcomes open dialogue with any member of management or Human Resources.
- Diversifying Holidays: Applicant has a policy of considering every employee's religious affiliation and will work with employees so they may best observe their observed holidays.

To ensure leadership has embraced the applicant's culture of promoting minority and veteran representation in the workforce, leadership is held accountable by:

- 100% of Owners, Investors, Hiring Managers and Leadership team members sign diversity and inclusion pledge.
- 100% of Hiring Managers and Leadership team members will take the Implicit Association Test annually to build awareness around personal biases.
- 100% of Leadership Team and Hiring Managers will conduct quarterly audits of Staffing, Hiring and Recruitment Goals.
- 100% of the Leadership Team engages in bi-annual diversity training targeting equity and inclusion competencies.
- Leadership maintains a goal that 80% of employees state they are satisfied with the effectiveness of inclusion programming on quarterly surveys. If this metric is not achieved, changes must be made by leadership.

2. Efforts to recruit minority persons and veterans for employment.

Applicant's Community and Recruitment Manager is James Smith. James has spent a career promoting economic development in marginalized communities and empowering at-risk youth with a criminal background. He was previously a Project Leader of the Reentry Center in Baltimore City with the Mayor's Office of Employment Development where he found over 600 jobs for ex-offenders with a very small recidivism rate. James has developed a robust Job Creation plan with key strategic partnerships to ensure representation of minority persons and veterans in the applicant's workforce. These partnerships will provide a continuous funnel for socio-economically disadvantaged job seekers, veterans, and individuals disproportionately affected by enforcement

of drug laws. For each position being filled for both launch and future hiring, the following goals and benchmarks must be adhered to:

- Identify 15 potential candidates for each new position.
- Include 2 employee referrals for each new position.
- Include 5 candidates that are Veterans as defined in 295.187, F.S.
- Include 8 people that are minorities as defined in as defined in section 288.703, F.S.
- Include 2 applicants that have a marijuana related offense.

To maintain a funnel of applicants to achieve these goals, applicant will utilize the Florida workforce system with the Florida Department of Economic Activity to access a large majority of potential candidates. Additionally, a partnership is in process with CareerSource Central Florida (CCF). CCF offers certification classes for ex-offenders. Lastly, applicant will be working with the American Job Center of Florida. American Job Centers were established under the Workforce Investment Act and reauthorized in the Workforce Innovation and Opportunities Act of 2014, the centers offer training referrals, career counseling, job listings, and similar employment-related services. These partnerships will provide applicants hiring pool with a continuous funnel of minority persons, veterans, and individuals from socio-economically disadvantaged areas. To meet its goals, applicant has created the aggressive annual schedule with partners, as follows:

- 1 in-person recruitment events per year.
- 1 in-person career presentation per year.
- 1 localized advertising campaign launched annually across various mediums and platforms.
- Attend 3 job fairs annually.

3. Plan to Contract for Services with MBE & and VBE

Applicant will select an MBE or VBE as its General Contractor for each facility. General Contractors will be advised that when analyzing bids, 30% of trades must be certified MBEs, and 30% of trades must be certified VBEs. Trades hired for services include:

- Site Works
- Concrete
- Masonry
- Metals
- Wood
- Plastics
- Thermal
- Moisture Protection
- Doors and Windows
- Finishes
- Specialties
- Equipment
- Furnishings
- Special Construction
- Conveying Systems
- Mechanical
- Plumbing
- Electrical

4. Metrics to demonstrate the effectiveness of the diversity plan:

Applicant will use the following metrics to highlight its success in implement the diversity plan:

- A minimum of 15% veteran representation in management.
- A minimum of 65%% minority representation in management.
- A minimum of 15% veteran representation in staff.
- A minimum of 65% minority representation in staff.
- Ownership must include a minimum of 10 minorities at the parent level.
- Ownership must include a minimum of 10 women at the parent level.
- 20% of leadership must be veterans.

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Subsection 4.11.2 – Implementation of Diversity Plan

1. Implementation: The following steps outline the order of events to implement the applicant's diversity plan:

(A) Complete Steps – Preparing the Plan and Hiring Key Personnel

1. Hire a Human Resource Manager with a track record of placing minority persons and veterans in jobs with a high rate of success (success is gauged by individual maintain the job for over 2 years).
2. Develop a plan to keep leadership accountable, including training and acknowledgements.
3. Develop recruitment metrics to hold hiring managers accountable.
4. Develop hiring metrics to ensure diversity representation in the business.
5. Establish metrics for the General Contractor to ensure MBE and VBE business are hired as trades during construction. Include metrics in engagement letter with General Contractor.
6. Outline positions to be hired during year 1.
7. Schedule leadership training with Human Resource Manager (James Smith).

(B) In-Process Steps – Preparing a Diverse Talent Pipeline

1. Human Resource Manager engages Florida workforce system with the Florida Department of Economic Activity.
2. Human Resource Manager engages CareerSource Central Florida (CCF).
3. Human Resource Managers engages American Job Center.
4. Order collateral for in-person recruitment events and career presentation.

(C) Steps after licensure – Implement Plan

1. Day 1 post-licensure: Digital job posting go live and the human resource team notifies partners in workforce development.

2. Cultivation Manager commences work on day 45 when cultivation authorization is submitted.
3. Remaining cultivation staff commence work on day 74 post licensure.
4. Postproduction Supervisor and processing staff commence work on day 109 when processing authorization is requested.
5. All Dispensary Managers commence work on day 98 for 4 weeks training.
6. Dispensary Technicians commence work on day 108 when dispensary authorization is requested.

2. History of Inclusion: Applicant's parent company operates the following licensed cannabis facilities, shown with current minority representation statistics:

- 33.33% veteran/active reserve representation in senior management (COO and General Counsel)
- Rhode Island cultivation, processing, and retail facility: 50% minority representation.
- Maryland dispensary facility: 30% minority representation.
- Maine dispensary facility: 30%
- New Jersey dispensary facility: 53%

3 History of Veteran Education: Applicant's management and parent company have a track record of outreach to veterans struggling in civilian life. Applicant provides veteran-specific medical marijuana education, led by Blake Costa, Chief Operating Officer, an Afghanistan War veteran with over 13 years of service in the Marine Corps and Army National Guard. Many veterans believe that becoming a medical marijuana patient is not an option for them and that it can jeopardize their VA services. However, the Veterans Health Administration Directive 2011-04 prohibits VA healthcare facilities from denying services to a veteran who is a legally certified

patient. Blake participates in educational outreach initiatives addressing veterans at local VA hospitals regarding the benefits of medical cannabis for PTSD.

4. Giving back to the Community: Applicant has a paid community engagement policy, where employees receive an additional 15 paid days off to spend these days volunteering in programming that benefits minorities or veterans in the community.

The applicant is proud to champion a partnership with The Black Church Food Security Network led by Pastor Heber Brown (“BCFSN”). The BCFSN provides seed funding and support to help congregations begin growing food on church-owned land. Applicant began its Partnership with BCFSN in 2020 while identifying urban farmer initiatives. Applicant and BCFSN work together to build greenhouses on church-owned land in minority neighborhoods, to help the community learn about agriculture and the benefits of holistic medicine. The following photos are from the Applicant’s greenhouse project in Baltimore, Maryland.



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Section 4.12

Certified Financial Statements and Available Funding

Subsection 4.12.1 – Certified Financial Statements

Please find annual certified financial statements for the applicant's most recent fiscal year, which have been prepared in accordance with U.S. Generally Accepted Accounting Principles (GAAP) and audited in accordance with U.S. Generally Accepted Auditing Standards (GAAS) by a Certified Public Accountant. The Certified Public Accountants are: 1) Christopher Marrie, CPA, who is the National Director for HBK CPAs and Consultants and 2) Gal Hen, CPA, who is the Regional Director for HBK CPAs and Consultants. Both are licensed in the state of Florida pursuant to Chapter 473, F.S.

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Subsection 4.12.2 – Available Funding

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4.12.2 - Addendum A

Documentation evidencing the availability and commitment of the dedicated funds identified in your narrative response.

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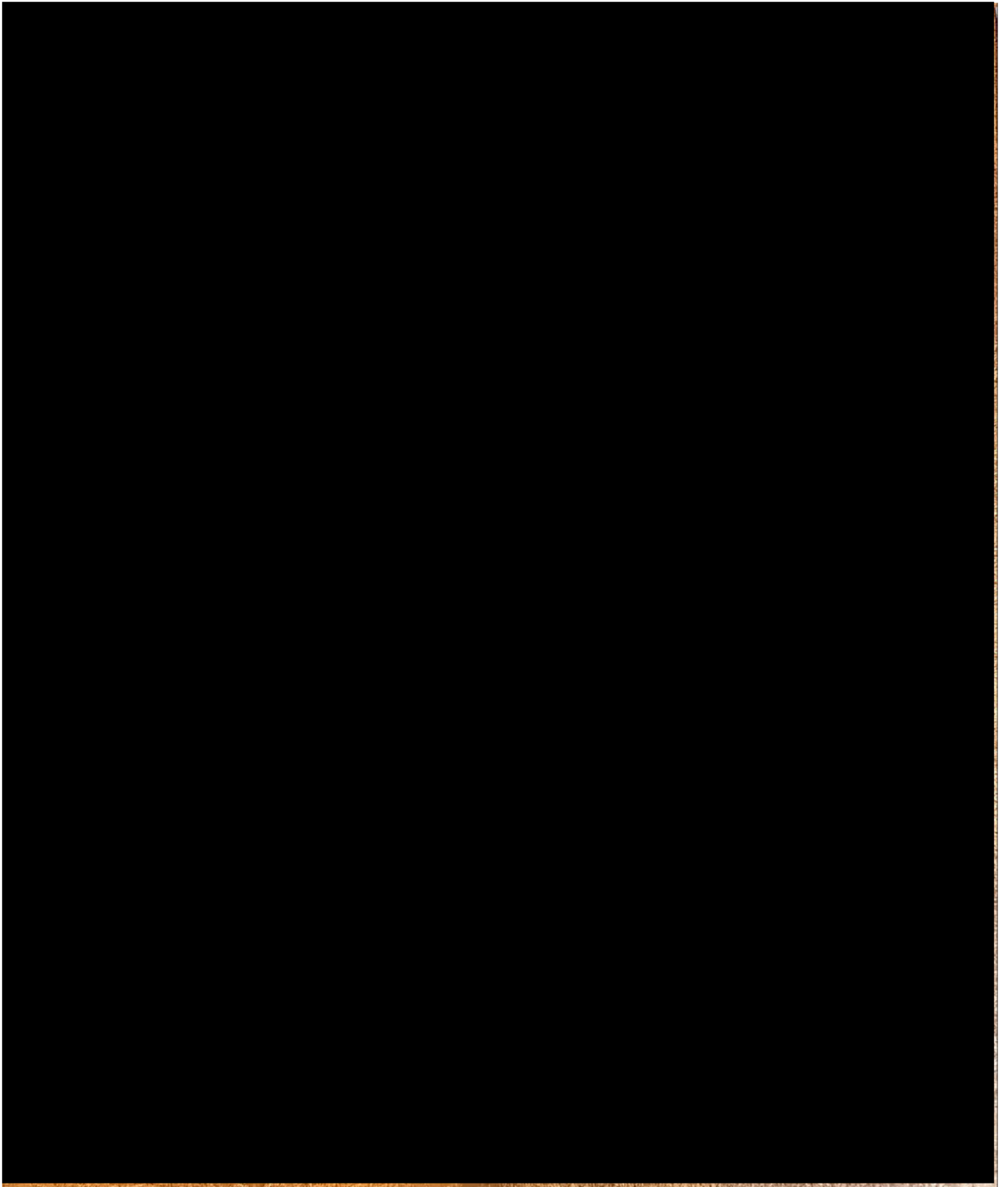


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Subsection 4.12.3 – Projected Budget

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*4.12.3 – Addendum
Cultivation and Processing 5-year Budget*

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4.12.3 – Addendum

Dispensary 5-year Budget (6 separate models for each location)

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Section 4.13

Business Ownership and Structure

Subsection 4.13.1- Ownership Information for Individual (Natural Person) Applicants

Not applicable. The applicant is not an individual.

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Subsection 4.13.2 - Ownership Information for Entity Applicants

1. Ownership Structure

Alamanda Farms LLC is 100% owned by FL Plant Based Therapy LLC.

FL Plant Based Therapy LLC is 100% owned by Sweetspot Brands LLC.

The following individuals account for 100% ownership of Sweetspot Brands LLC:

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2. Business Addresses

Alamanda Farms LLC: 21126 136th Street, Live Oak, Florida

FL Plant Based Therapy LLC: 17 Faye Lane, Mount Pleasant SC 29464

Sweetspot Brands LLC: 5 Ann Court, Warren RI 02885

3. Taxpayer IDs

Alamanda Farms LLC: Confidential-Exempt from Public

FL Plant Based Therapy LLC: Confidential-Exempt from Public

Sweetspot Brands LLC: Confidential-Exempt from Public

4. Partnership agreements, joint venture documents, operating agreements, shareholder agreements, and buy/sell agreements, if any.

Operating agreements for Alamanda Farms LLC, FL Plant Based Therapy LLC and Sweetspot Brands LLC are included in the next section.

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Subsection 4.13.3 - Capitalization Tables, Change of Control, and Related Entities

A. Capitalization Tables

Capitalization Table – Alamanda Farms, LLC

Member	Ownership %
FL Plant Based Therapy LLC	100

Capitalization Table – FL Plant Based Therapy, LLC

Member	Ownership %
Sweetspot Brands LLC	100

Capitalization Table – Sweetspot Brands, LLC

To avoid redundancies, please find Sweetspot Brands LLC capitalization table above in 4.13.2.

B. Publicly Traded

The applicant is not a publicly traded corporation. No owner of the applicant is a publicly traded corporation.

C. All agreements concerning control of the applicant

Operating agreements for Alamanda Farms LLC, FL Plant Based Therapy LLC and Sweetspot Brands LLC are included in the next section.

D. Identify all entities related to the applicant (if any), including parent companies, subsidiary companies, sister companies, and any other affiliated companies and provide all documents of these related entities that pertain to the ownership or control of the applicant.

The following is a list of all entities related to the applicant, including the parent company and its subsidiaries. The only documents related to the ownership or control of the applicant is the operating agreements for each of the entities included above.

Company Name		State of Formation	Company Type	Company Address
1	JBE Industries LLC	RI	LLC - Partnership	100 Pioneer Avenue, Warwick, RI 02888
2	B1 Earthgroup LLC	MD	LLC - Partnership	18070 Georgia Avenue, Olney, MD 20832
3	Sweetspot Brands LLC	RI	LLC - Partnership	5 Ann Court, Warren, RI 02885
4	ME Plant Based Therapy LLC	ME	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
5	JBEC LLC	MD	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
6	Plant Based Compassionate Care LLC	VA	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
7	MD Plant Based Therapy LLC	MD	LLC - Partnership	18070 Georgia Avenue, Olney, MD 20832
8	NJ Plant Based Compassion LLC	NJ	LLC - Partnership	Five Greentree Centre, Ste. 104, Marlton, NJ 08053
9	Veterans for Alternative Medicine LLC	RI	LLC - Partnership	5 Ann Court, Warren, RI 02885
10	Plant Based Compassionate Care Inc.	RI	NonProfit Corporation	5 Ann Court, Warren, RI 02885
11	ME Plant Based Compassionate Care LLC	ME	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
12	Veterans for Alternative Medicine South Jersey LLC	NJ	LLC - Partnership	Five Greentree Centre, Ste. 104, Marlton, NJ 08053
13	CT Plant Based Compassionate Care LLC	CT	LLC - Partnership	401 Commons Park S, Stamford, CT 06902
14	CT Plant Based Therapy LLC	CT	LLC - Partnership	401 Commons Park S, Stamford, CT 06902
15	Sweetspot Garden State LLC	NJ	LLC - Partnership	4 Deer Run, Glen Gardner, NJ 08826
16	Sweetspot New Jersey LLC	NJ	LLC - Partnership	56 Hahn Avenue, Rochelle, NJ 07662
17	Sweetspot North Jersey LLC	NJ	LLC - Partnership	108 Buckhaven Hill, Upper Saddle River, NJ 07548
18	Sweetspot West Orange LLC	NJ	LLC - Partnership	101 Gates Avenue, Unit J12, Montclair, NJ 07042-2521
19	Sweetspot Franchising LLC	DE	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
20	Sweetspot Dispensary LLC	NJ	LLC - Partnership	702 Rahway Avenue, Elizabeth, NJ 07202
21	Websti Consulting LLC	CT	LLC - Partnership	90 State Street, Ste. 700 Office 40, Albany, NY 12207
22	Sweetspot Properties LLC	DE	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
23	Norwich CT Holdings LLC	CT	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
24	NY Plant Based Compassion LLC	NY	LLC - Partnership	45 Riverside Drive, Apt. 3A, New York, NY 10024
25	New York Dispensary LLC	NY	LLC - Partnership	45 Riverside Drive, Apt. 3A, New York, NY 10024
26	Excelsior Dispensary LLC	NY	LLC - Partnership	45 Riverside Drive, Apt. 3A, New York, NY 10024
27	Sweetspot Vermont LLC	VT	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
28	Sweetspot West Hartford LLC	CT	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
29	Sweetspot Stamford LLC	CT	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
30	SSCT Management LLC	CT	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
31	CT SE Holding Company LLC	CT	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
32	FL Plant Based Therapy LLC	FL	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464
33	Alamanda Farms LLC	FL	LLC - Partnership	17 Faye Lane, Mount Pleasant, SC 29464

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Operating Agreement: Alamanda Farms LLC

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Operating Agreement: FL Plant Based Therapy LLC

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Operating Agreement: Sweetspot Brands LLC

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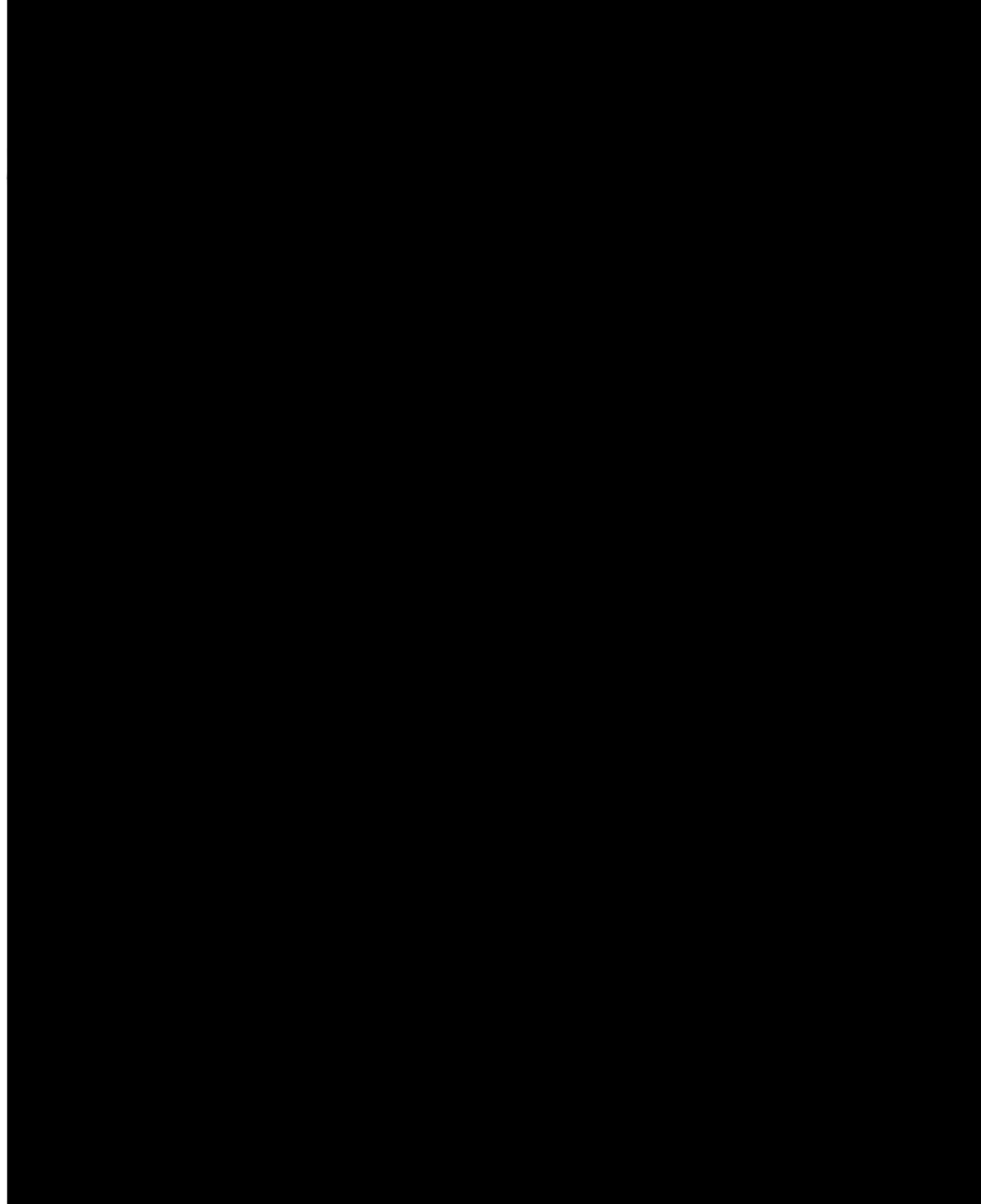
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HEREOF, the Company and the undersigned Members have signed and
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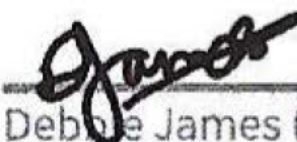
LLC,

and Director

FOUNDER MEMBERS,

Print Name: _____

CLASS A MEMBERS,


Deborah James (Apr 30, 2021 09:09 CDT)

Print Name: Deborah James _____s

CLASS B MEMBERS,

Print Name: _____

CLASS C MEMBERS,

Print Name: _____

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ed Members have signed and
r, the date set forth after the

Print Name: _____

CLASS C MEMBERS,

Print Name: _____

SWEETSPOT BRANDS LLC
JOINDER AGREEMENT

ER AGREEMENT (this "*Agreement*") is by and among Sweetspot Brands limited liability company (the "*Company*"), Kathleen Pierce (the "*Replaced Member*"), and shall be effective as of June 8, 2021.

he Company, the members of the Company as set forth in Annex A of the Agreement, as amended from time to time (the "*Operating Agreement*"), member are parties to the Operating Agreement as currently in effect and as time to time.

the Substitute Member desires to replace the Replaced Member as a member under the Operating Agreement.

WHEREAS, pursuant to Section 13.3(a)(i) of the Operating Agreement the execution and delivery of this Agreement is a condition precedent to the Substitute Member becoming a member under the Operating Agreement in substitution for the Replaced Member.

NOW, THEREFORE, for the consideration set forth herein, and for other good and valuable consideration, the receipt and sufficiency of which are hereby jointly and severally acknowledged, the parties hereto agree as follows:

1. Joinder in the Operating Agreement. The Company, the Substitute Member and the Replaced Member hereby agree that from and after the date hereof, the Substitute Member shall be a party to the Operating Agreement as a "*Associate Member*" (as such term is defined in the Operating Agreement) thereunder and shall be bound by all of the obligations and entitled to the rights and benefits of the terms thereof as a Associate Member as if the Substitute Member were an original party thereto, in place of the Replaced Member for which it has been substituted under the Operating Agreement. The Substitute Member hereby agrees to all provisions of the Operating Agreement, and agrees that the signature page hereof may be attached to any counterpart copy of the Operating Agreement.
2. Counterparts. This Agreement may be executed in two or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

[SIGNATURE PAGES FOLLOW]

HEREOF, the parties hereto execute this Agreement as of the date first set

Company:

Sweetspot Brands LLC

By: Jason Webski

Name: Jason Webski

Title: CEO

Substitute Member:

Ken Pierce

Name: Ken Pierce

Number of Associate Units held by Substitute Member:
50,000

Replaced Member:

Kathleen Pierce

Name: Kathleen Pierce

Number of Associate Units previously held by Replaced
Member: 50,000

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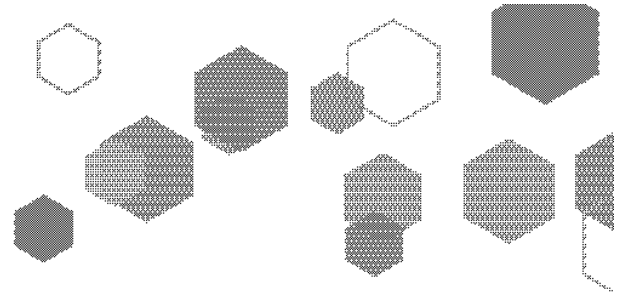


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Section 4.14

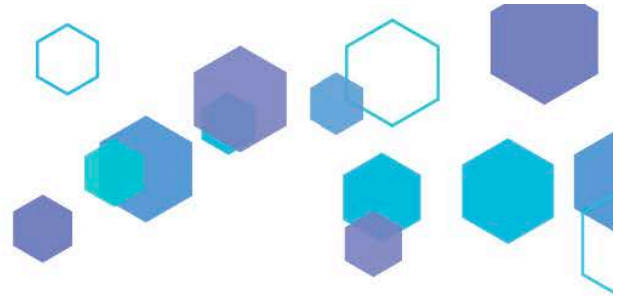
Applicant Acknowledgement



FORM 3(A): ENTITY APPLICANT ACKNOWLEDGMENT AND STATEMENT OF UNDERSTANDING

I, Jason Webski, the undersigned representative, hereby represent and warrant that I am authorized to submit this application on behalf of the entity listed on the application (the Applicant) and to attest to the following on behalf of the Applicant.

- All information included in the application is true and correct. Applicant understands that the Department will rely on such information, and that any material misrepresentation in this application is grounds for licensure denial. Further, Applicant understands that if the applicant knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his or her official duty, the applicant may be found guilty of a misdemeanor of the second degree, punishable as provided in sections 775.082 or 775.083, F.S.
- Applicant understands that this application for licensure creates neither an entitlement to, nor a vested right in, licensure.
- No individual or entity that owns, controls, or holds power to vote 5 percent or more of the voting shares of the Applicant has any direct or indirect ownership or control of a voting share of any currently licensed MMTC.
- No individual or entity that owns, controls, or holds power to vote 5 percent or more of the voting shares of any currently licensed MMTC has any direct or indirect ownership or control of a voting share of the Applicant.
- No currently licensed MMTC has any direct or indirect ownership or control of any voting shares or other form of ownership of the Applicant.
- The Applicant does not have any direct or indirect ownership or control of any voting shares or other form of ownership of a currently licensed MMTC.



- Notwithstanding the contents of the application, upon licensure, Applicant agrees to abide by, and be bound to, all the requirements of section 381.986, F.S., and all Department rules relating to medical marijuana and medical marijuana treatment centers.
- Applicant understands and agrees that if the Department determines at any point after licensure that the application contained a material misrepresentation, then the license will be revoked.

Representative Name (Printed): Jason Webski

Representative Signature: *Jason Webski*
Jason Webski (Apr 11, 2023 20:35 EDT)

MMTC Applicant Name: Alamanda Farms LLC

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Section 4.15 – Citrus Preference Documentation

The Applicant is not seeking to qualify for the citrus preference.

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Section 4.16 – Pigford/BFL Application Fee Transfer Request

The Applicant is not seeking to transfer an application fee from the Pigford/BFL batching cycle.