

**Mission:**

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



**Ron DeSantis**  
Governor

**Joseph A. Ladapo, MD, PhD**  
State Surgeon General

**Vision:** To be the **Healthiest State** in the Nation

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**Sent via Electronic Delivery**

May 25, 2023

Liner Source, Inc.  
c/o James L. Langford  
21102 State Road 44  
Eustis, Florida 32736  
[james.langfordlinersource.com](mailto:james.langfordlinersource.com)

Re: Application for MMTC Licensure – Errors and Omissions Letter

Dear Liner Source, Inc.,

On April 27, 2023, the Florida Department of Health received your application for MMTC licensure (the “Application”). The Department has identified the following apparent errors or omissions in your Application.

**1. Subsection 4.3.3, Level 2 Background Screening**

Subsection 4.3.3 of the Medical Marijuana Treatment Center License Application Instructions, Requirements and Forms (the “Application Instructions”) requires an applicant’s owners and managers to submit a full set of fingerprints to a Livescan Service Provider for purposes of level 2 background screening. The Department has not yet received an FDLE background report for the following individuals, who are identified as owners or managers in Subsection 4.3.3 of your Application:

**435.09**

Please ensure that these individuals have successfully submitted a full set of fingerprints to a Livescan Service Provider for purposes of level 2 background screening. Once that is accomplished, the Department will be provided the background report by FDLE.

Additionally, Subsection 4.3.3 requires that the applicant submit a completed Form 2 (Waiver Agreement and Statement) for each owner or manager, as those terms are defined by Department rules. The Form 2 contained in Subsection 4.3.3 of your Application is either incomplete or incorrect for the following individual:

**435.09**

Please provide a corrected and complete Form 2 executed by the above-listed individual.

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## 2. Subsection 4.12.1, Certified Financial Statements

Section 381.986(8)(b)7., Florida Statutes, requires that an applicant for MMTC licensure demonstrate “the financial ability to maintain operations for the duration of the 2-year approval cycle, including the provision of certified financial statements to the Department.” Subsection 4.12.1 of the Application Instructions requires the certified financial statements to be 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 (“CPA”) licensed pursuant to Chapter 473, Florida Statutes, or licensed by another state.

Your Application does not contain certified financial statements as required by section 381.986(8)(b)7., Florida Statutes, and Subsection 4.12.1 of the Application Instructions. Although Subsection 4.12.1 of your Application contains financial statements for Liner Source, Inc., the financial statements do not appear to be in conformity with GAAP because [REDACTED] 119.0715. Additionally, it appears that [REDACTED] 119.0715.

Please provide certified financial statements for Liner Source, LLC, as required by Subsection 4.12.1 of the Application Instructions.

## 3. Subsection 4.13.3, Capitalization Tables, Change of Control, and Related Entities

Section 4.13.3 of the Application Instructions requires an applicant to identify the natural person owners and natural person beneficiaries of all entities listed on the requested capitalization table. Subsection 4.13.3 of your Application includes a capitalization table reflecting ownership by [REDACTED] 119.0715. However, you did not identify [REDACTED] 119.0715.

Please provide a single, aggregated and fully diluted capitalization table to sum all natural person interests to 100% for Liner Source, Inc. The table must list all share types and interests and must show the aggregate sum of shares, including those associated with or flowing to any natural person owners or investors for the [REDACTED] 119.0715.

Additionally, for purposes of ownership attribution, please provide the nature of the familial relationship, if any, among and between the individuals listed in Subsection 4.13.3 of the Application, [REDACTED] 119.0715.

Lastly, if any natural person meets the definition of “owner” or “manager,” even if by familial attribution of ownership (as provide by Department rule), such natural persons must submit a completed Form 2 and a full set of fingerprints to a Livescan Service Provider for purposes of level 2 background screening. Those natural persons must also be added to an updated list of owners and managers in Subsection 4.3.3 of your Application and submitted to the Department.

## 4. Section 4.15, Citrus Preference Documentation

Section 4.15 of the Application Instructions requires applicants seeking to qualify for the citrus preference, as described in section 381.986(8)(a)3., Florida Statutes, to provide certain documents and information. Among other things, an applicant is required to:

Provide a deed or other recorded document demonstrating that the applicant holds legal ownership of the facility (or facilities) identified in item 1. Additionally, provide the parcel ID number associated with the facility (or facilities) . . . .

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Although your application includes a deed, it appears the deed does not

119.0715

Please provide a deed or other recorded document demonstrating that you, Liner Source, Inc., hold legal ownership of the facility (or facilities) that is or was used for the canning, concentrating, or otherwise processing of citrus fruit or citrus molasses, as required by section 4.15 of the Application Instructions.

### **Deadline to Respond**

The Department must receive the above-requested documentation and information within twenty-one (21) calendar days of the date on which the Department emails this letter to you. See Section 5.1 of the Application Instructions for the submission address and requirements. Failure to supply the requested documentation and information identified above may result in denial of your Application.

If any materials submitted to the Department in response to this letter contain confidential information, you must comply with the requirements of Section 2.4 of the Application Instructions when submitting such information.

Sincerely,

*Christopher Kimball*

Christopher Kimball  
Director  
Office of Medical Marijuana Use