

**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**Sent via Electronic Delivery**

May 25, 2023

Florida Sports Consultants Inc., d/b/a Belushi's Farm Florida  
c/o Frank Woods  
27499 Riverview Center Blvd.  
Bonita Springs, Florida 34134  
[derek.woods@belushisfarmfl.com](mailto:derek.woods@belushisfarmfl.com)

Re: Application for MMTC Licensure – Errors and Omissions Letter

Dear Florida Sports Consultants 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 4.8.4, Prior Enforcement Action**

Subsection 4.8.4 the Medical Marijuana Treatment Center License Application Instructions, Requirements and Forms (the "Application Instructions") requests that the applicant disclose and describe prior enforcement actions taken against the applicant's owners and managers. The applicant must first state whether each of its owners and managers has served as an owner or manager of a Florida-licensed dispensing organization or MMTC that has been subject to enforcement action by the Department. The applicant must then describe any such enforcement action.

In your Application, you indicated that individuals listed as owners or managers in Subsection 4.3.3 of your Application have been [REDACTED] 119.0715



While you stated that enforcement actions may have been taken against [REDACTED] 119.0715, the Application omits information describing those enforcement actions.

Please describe the circumstances surrounding any enforcement actions taken against [REDACTED] 119.0715.

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

Section 381.986(8)(e)2., Florida Statutes, prohibits an MMTC, and any individual or entity who directly or indirectly owns, controls, or holds the power to vote 5 percent or more of the voting shares of an MMTC, from acquiring direct or indirect control of any voting shares or other form of ownership of any other MMTC.

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, **119.0715** [REDACTED].

Additionally, 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.

## 3. 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) . . . .

Your application does not include a deed or other recorded document demonstrating that the applicant, Florida Sports Consultants, Inc., holds legal ownership of the facility. Although the Application includes **119.0715** [REDACTED], those documents do not appear to be a deed or other recorded document demonstrating that Florida Sports Consultants, Inc. holds legal *ownership* of the facility.

Please provide a deed or other recorded document demonstrating that you, Florida Sports Consultants, 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.

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Sincerely,

*Christopher Kimball*

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Director

Office of Medical Marijuana Use