

## **SECTION 4.1 – APPLICANT INFORMATION**



### FORM 1: APPLICANT GENERAL INFORMATION

Applicant Information				
Applicant Name				
Island Farms, INC				
Mailing Address				
5560 Shore Court				
City	Apt/Ste #	State	ZIP Code	Country
Orlando		FL	32819	USA

Contact Information		
First Name	Last Name	Middle Initial
Ryan	Scotson	
Telephone Number	Designated Email (for Department/Applicant Communications)	
(321) 297-8960	ryan@cannamd.com	

Medical Director Information		
First Name	Last Name	Middle Initial
Vincent	Jarvis	
Florida Physician (MD or DO) License Number	Telephone Number	Email
ME67064	(917) 690-3811	dr.jarvis@cannamd.com

## **SECTION 4.2 DECLARATION OF EXEMPT INFORMATION**

Pursuant to Florida Statute 119.071(1)(c), we would raise exemptions from disclosure as public records the following items:

Any financial information contained within the proposal pursuant to Florida Statutes 456.00125(3) and 119.071(5)(b) including:

- Subsection 4.12.1
- Subsection 4.12.2
- Subsection 4.12.2 - Addendum
- Subsection 4.12.3
- Subsection 4.12.3 – Addendum

Pursuant to Florida Statute 119.071(5)(a)5, we would propose that all Social Security numbers contained within the proposal are exempt from public disclosure including within:

- Subsection 4.13.2
- Subsection 4.13.3

Pursuant to Florida Statute 119.071(3)(a)1 we would assert that the security plans in our proposal are exempt from public disclosure including:

- Subsection 4.7.1
- Subsection 4.7.1 – Addendum
- Subsection 4.7.2
- Subsection 4.7.3

We would also propose that pursuant to Section 119.07 and Florida Statute 812.081 that all records related to the growing, cultivating, processing of the cannabis pursuant to the license contains trade secret information. Included within that exemption we would assert are the dispensing and business plans provided in the proposal. These sections include:

- Subsection 4.4.1
- Subsection 4.4.2
- Subsection 4.4.3
- Subsection 4.5.1
- Subsection 4.5.2
- Subsection 4.5.3
- Subsection 4.6.1
- Subsection 4.6.2
- Subsection 4.6.2 – Addendum
- Subsection 4.6.3
- Subsection 4.8.3

#### **SUBSECTION 4.3.1 – FLORIDA BUSINESS REGISTRATION**

# *State of Florida*

## *Department of State*

I certify from the records of this office that ISLAND FARMS, INC. is a corporation organized under the laws of the State of Florida, filed on August 15, 2005.


The document number of this corporation is P05000113719.

I further certify that said corporation has paid all fees due this office through December 31, 2023, that its most recent annual report/uniform business report was filed on April 20, 2023, and that its status is active.

I further certify that said corporation has not filed Articles of Dissolution.

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



  
*Secretary of State*

Tracking Number: 6526373916CU

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

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

## **SUBSECTION 4.3.2 – DACS DOCUMENTATION**



**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

COMMISSIONER  
WILTON SIMPSON

**ISSUED TO:**

ISLAND FARMS, INC.  
BARR, ILIANA  
17960 SW 232ND ST  
MIAMI, FL 33170-5414

**THIS CERTIFICATE EXPIRES:** 09/16/2023

**FEE PAID:** \$200.00

**REGISTRATION NO.:** 47236432

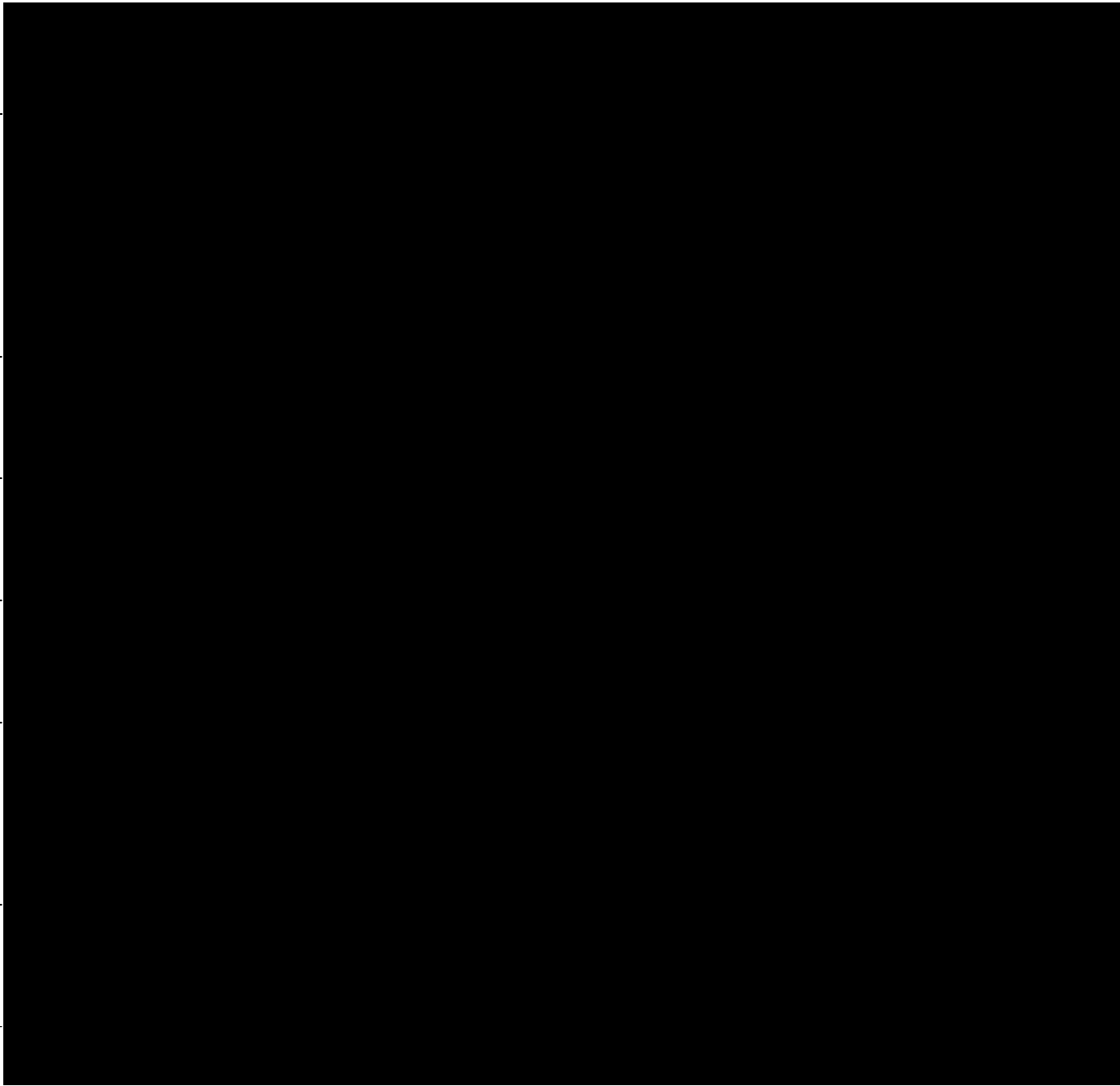
**DATE ISSUED:** 08/12/2022

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.

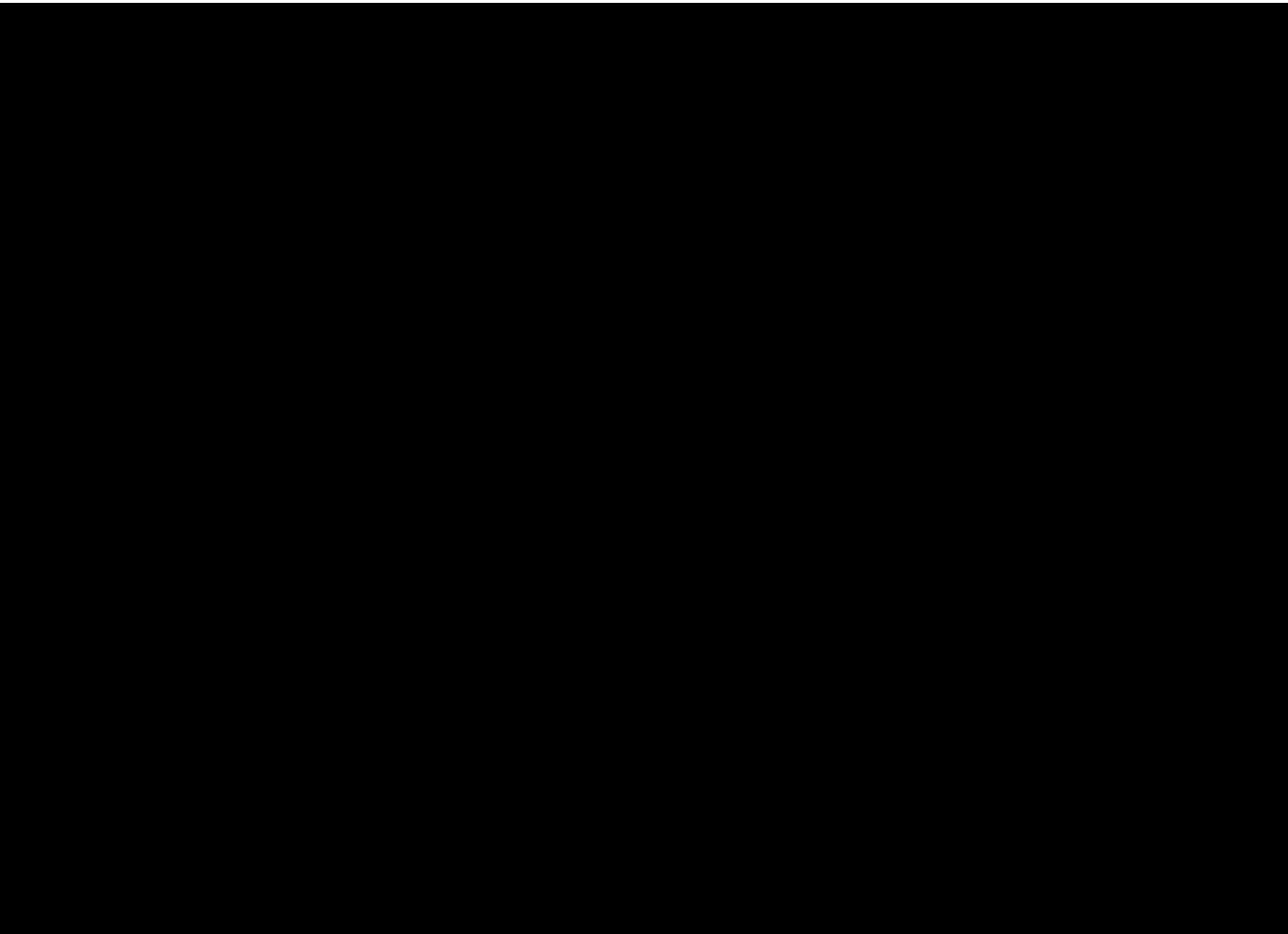
### **SUBSECTION 4.3.3 - LEVEL 2 BACKGROUND SCREENING**

Name	Position (Owner or Manager)
435.09	



[illegible]

435.09	























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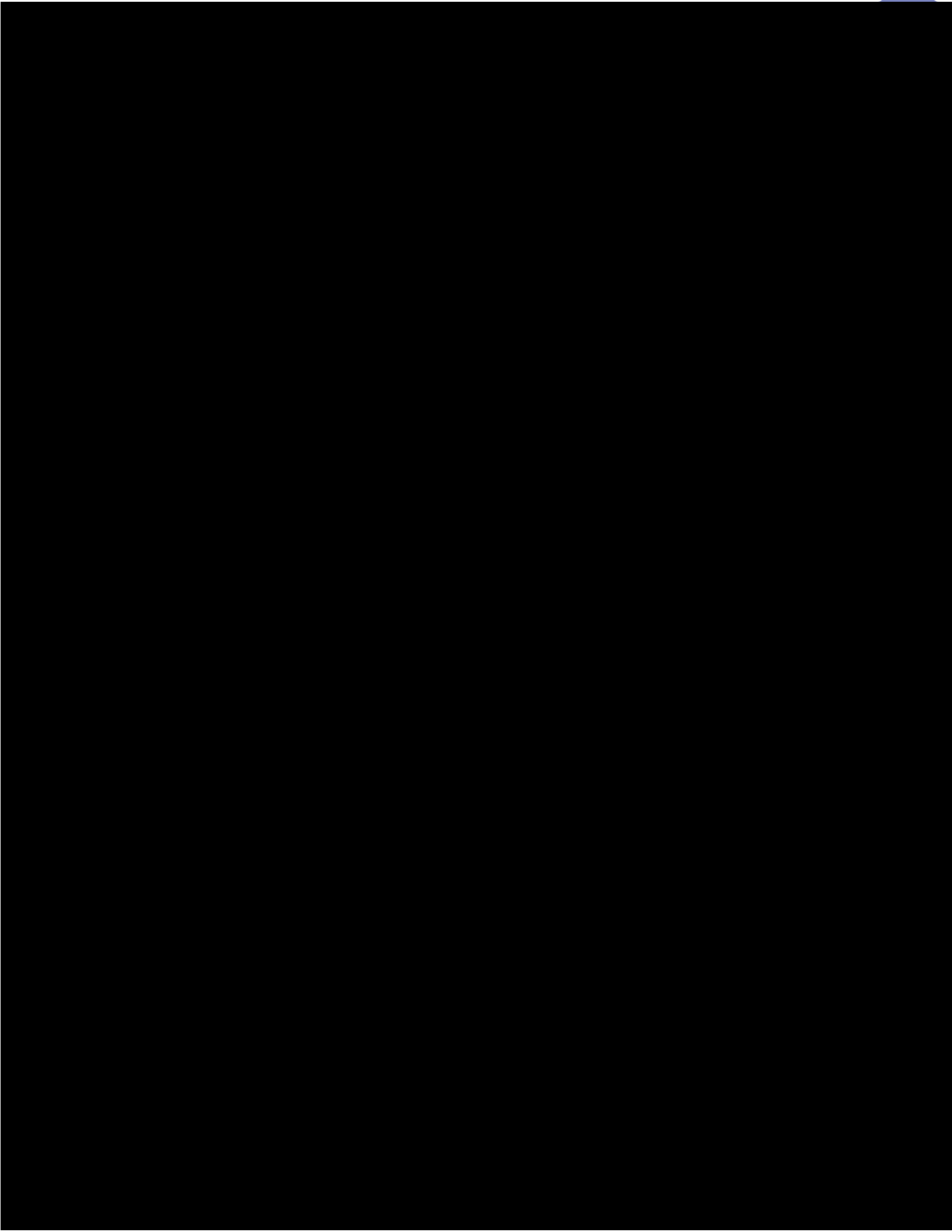
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## SUBSECTION 4.5.1 – PROCESSING PLAN

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A series of horizontal black bars of varying lengths, resembling a barcode or a stylized text representation. The bars are arranged in a vertical sequence, with some being longer than others, creating a rhythmic pattern. The bars are solid black and set against a white background.

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A series of horizontal black bars of varying lengths, resembling a barcode or a stylized text representation. The bars are arranged in a vertical sequence, with some being longer than others, creating a rhythmic pattern. The bars are solid black and set against a white background.

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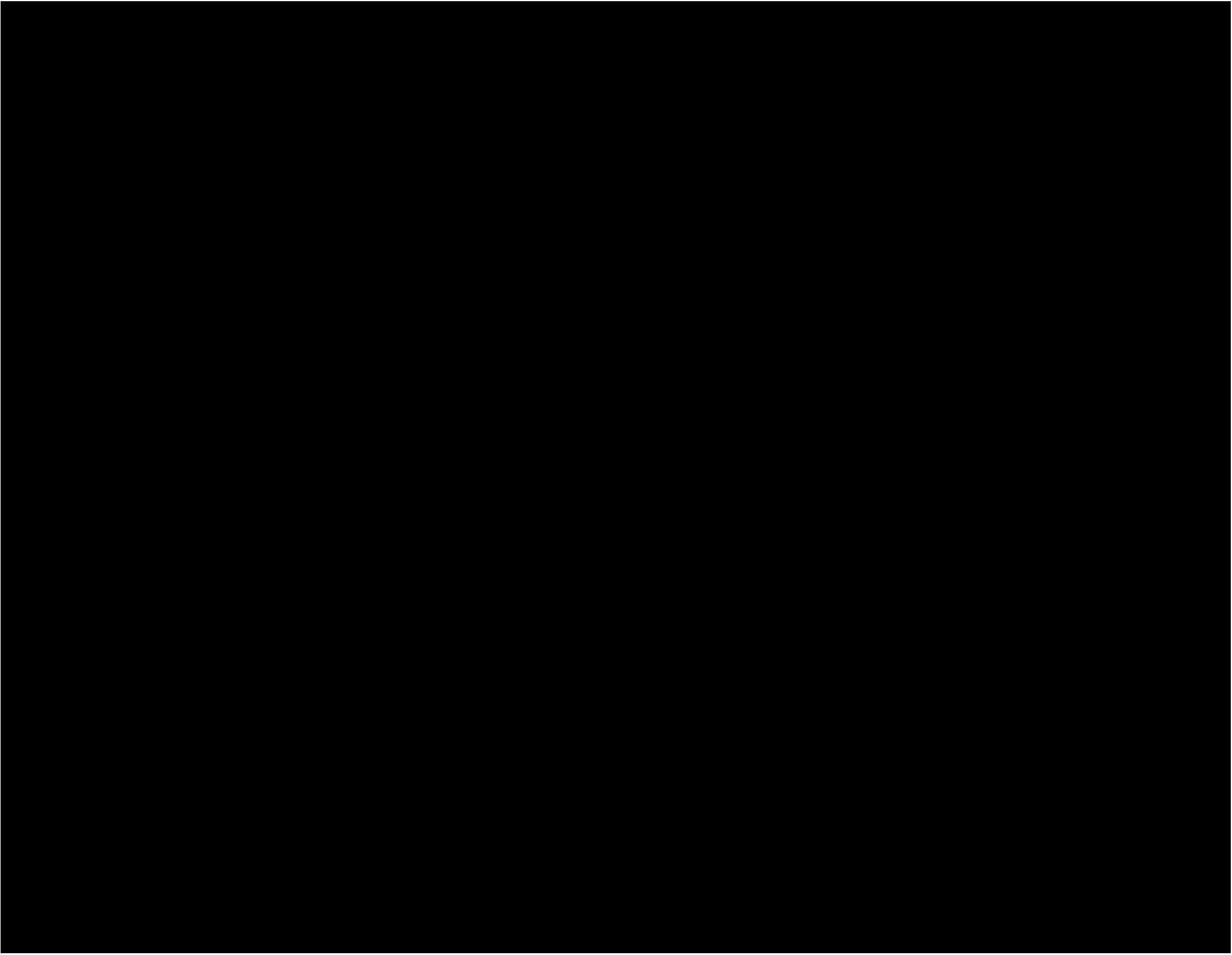
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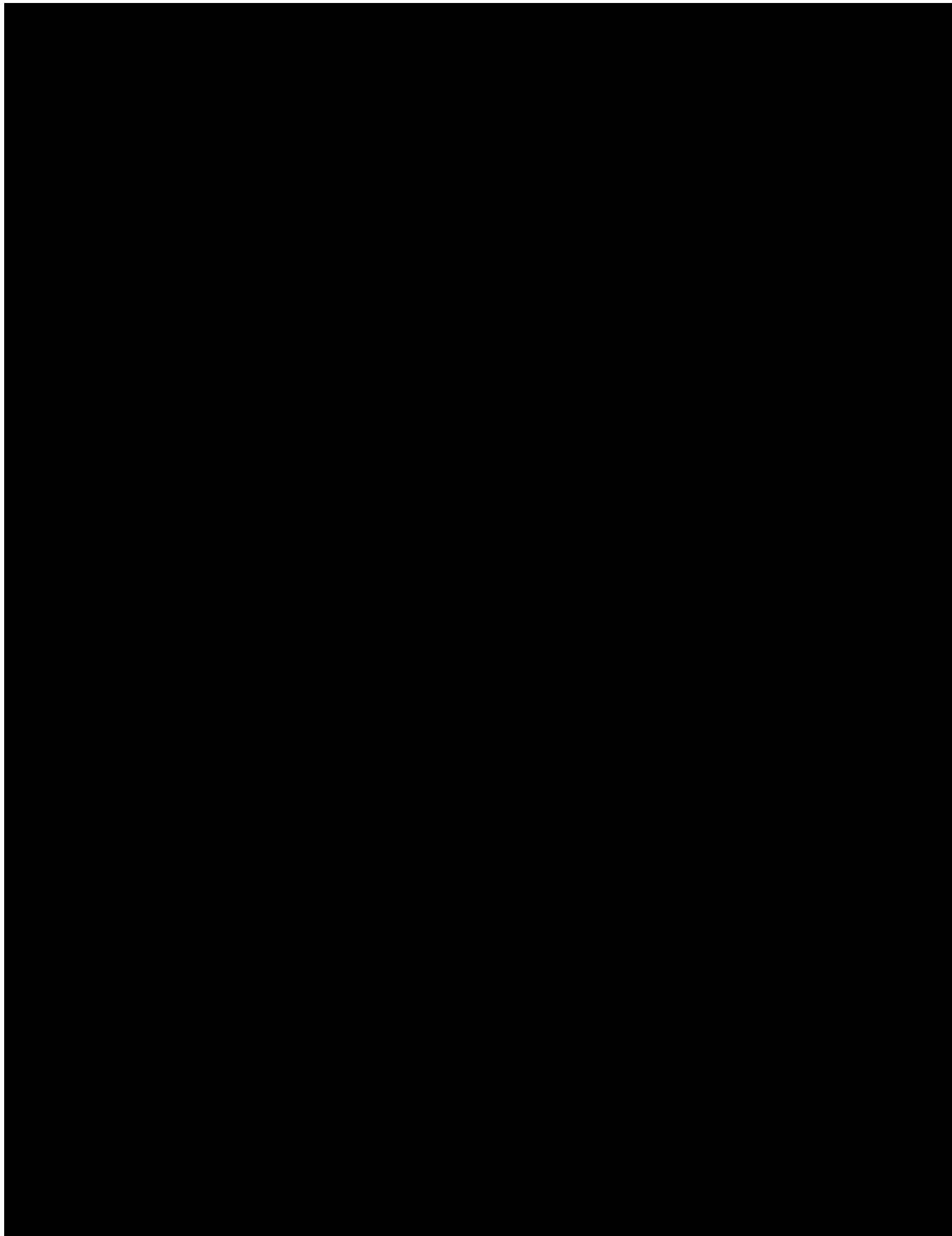
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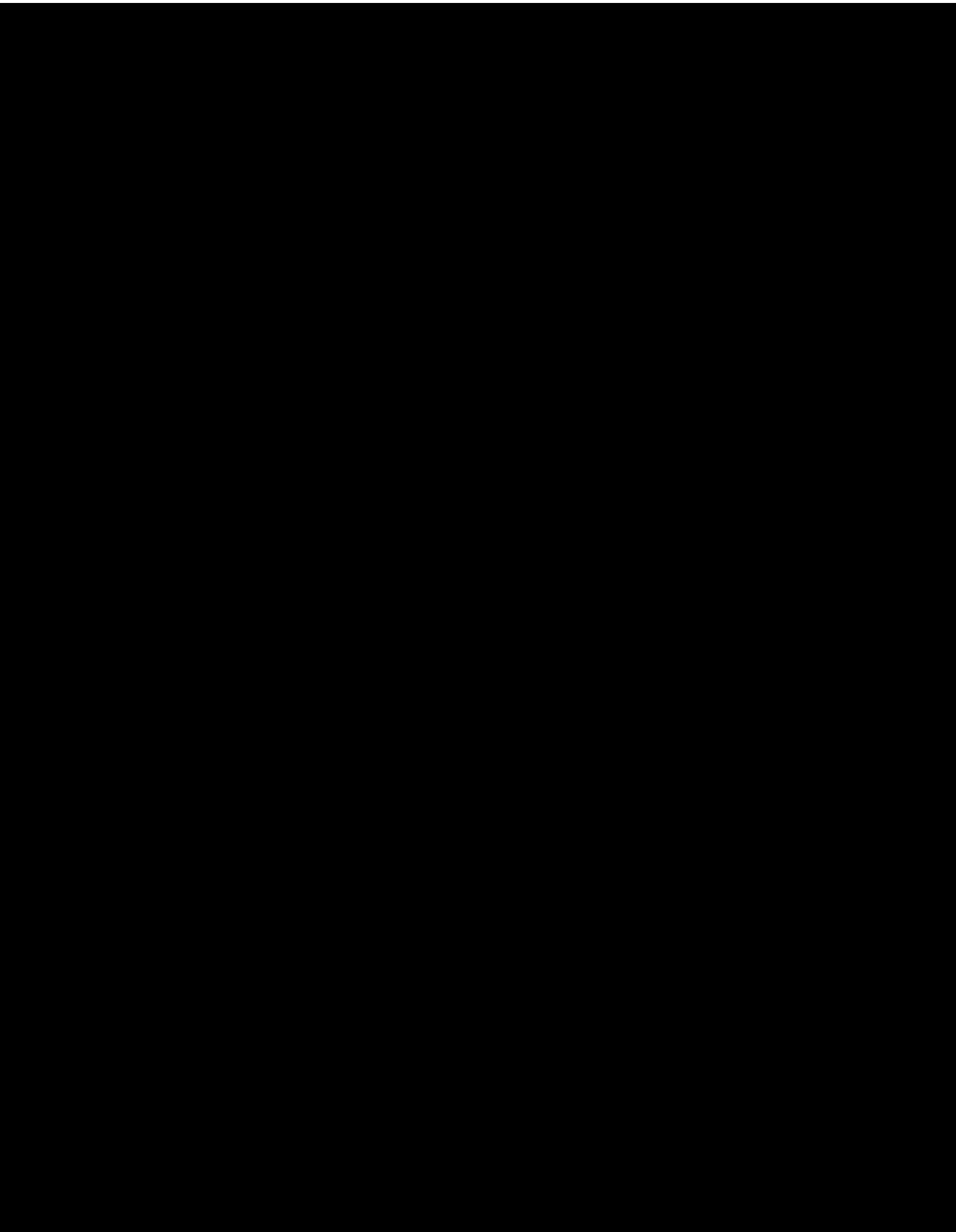
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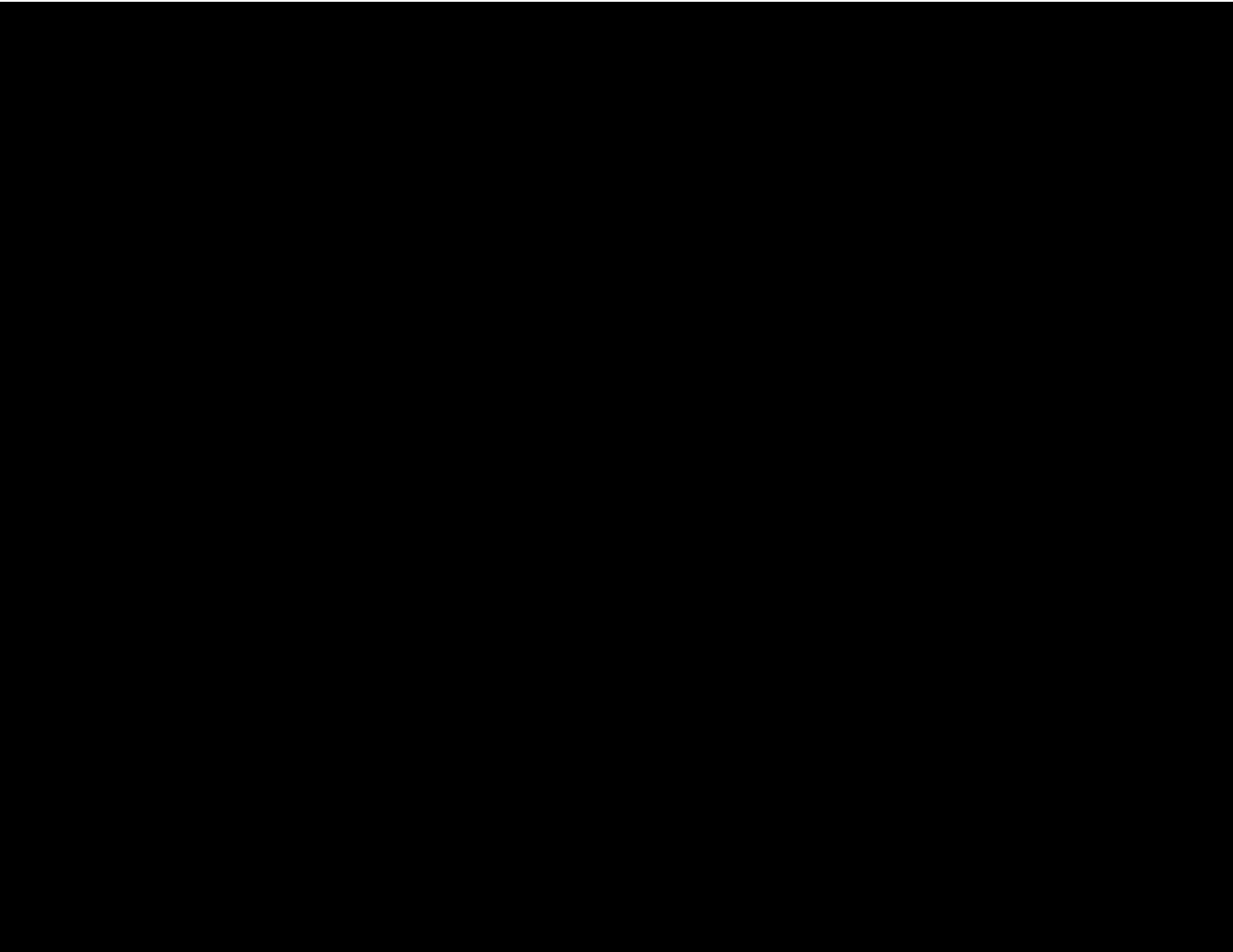
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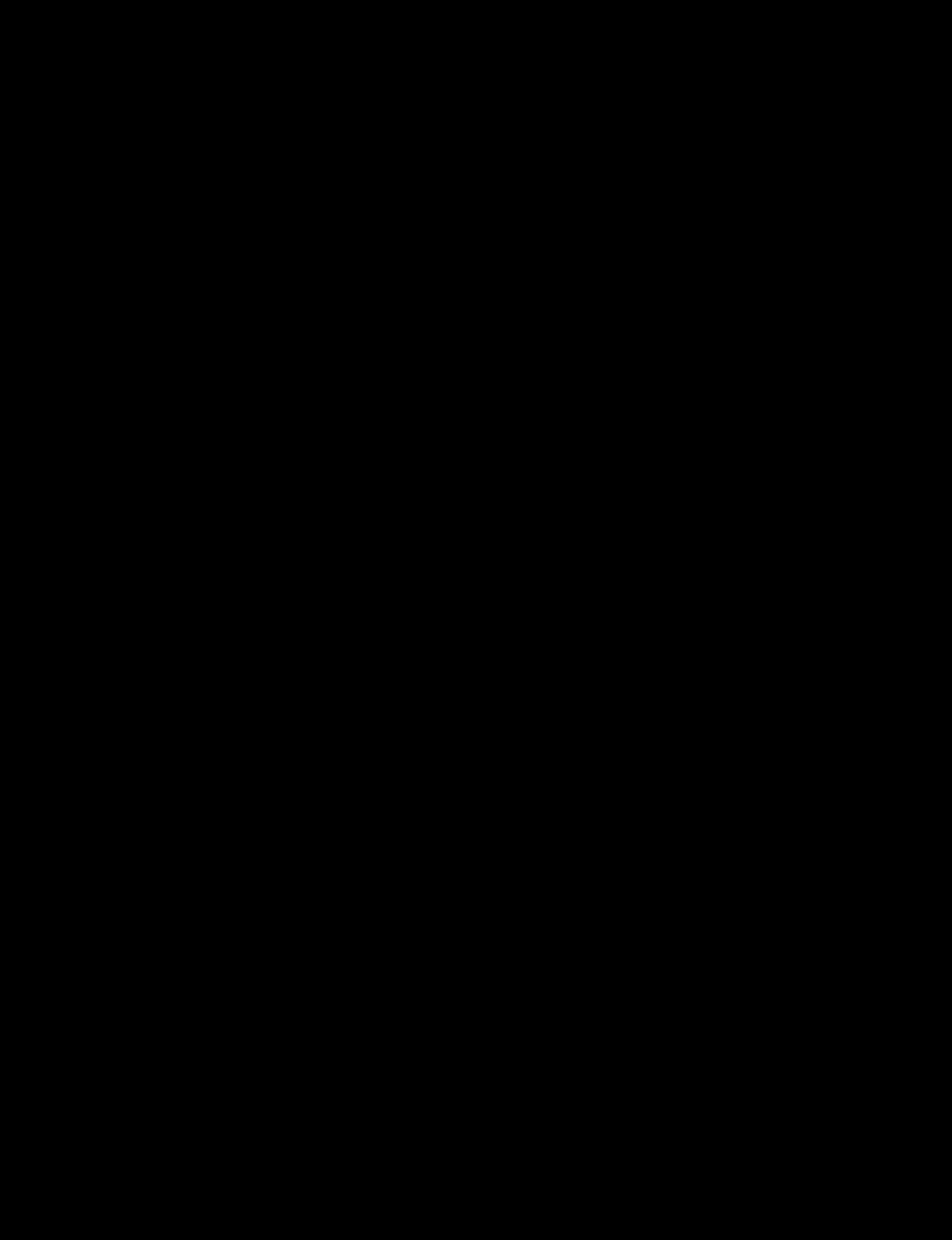
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## **SUBSECTION 4.7.4 – PERSONNEL SCREENING AND TRAINING**

### **Background Screening and Documentation**

To maintain a safe, lawful, and secure facility, we will require all employees, including owners and managers, to be at least 21 years of age, and to undergo rigorous level 2 background screening pursuant to Chapter 435, F.S. We will not allow anyone to fill these roles until we obtain written notice from the Department, and all other relevant entities such as the Department of Law Enforcement, that they have successfully passed all background screening. 64-4.208(1)(a), 4.208(2)(a), 435.05(c), F.S.; 381.986(9), F.S.; 381.986(8)(e)(5), F.S.; 64-2(2)(d)(10), These screenings will require all individuals to submit a full set of fingerprints to the Department, or a vendor, entity, or agency authorized by 943.053(13), F.S., such as a Livescan Service Provider, and supply the ORI number FL924890Z. We will submit a request for the Department to process everyone's background screening no later than six months after they submit their fingerprint scan. 64-4.20(b)-(d), Section 86(9)(a), F.S. If an individual's fingerprints are rejected twice by the department, vendor, entity, or agency, we will instruct them to participate in the FBI's name check procedure. 64-4.208(2). Additionally, we will comply with all additional information requests from the department to complete the background screening. 64-4.208(2)(e), will document and maintain records of all fingerprint scans and background checks and will pay the \$6.00 annual fee per employee for the AFRNP. 64-4.208(3)(a). We will also document and maintain records of all employees, their background screening verification, and other qualifications, and will supply these to the Department following a request for such. 64-4.208(2)(e). Island Farms' Chief Compliance Officer (CCO) is responsible for maintaining files for every employee and owner. Each file will include all records associated with background screenings, including notices from the Department, dates of background screenings, and copies of

the “Waiver Agreement and Statement”. Island Farms will retain the background screening records, including the notices, for at least five years after the individual is terminated, removed, or separated from Island Farms.

In the event an employee, owner, or manager is arrested in connection with any disqualifying offenses in Section 435.04, F.S. or an offense under Chapters 837, 895, or 896, F.S., we will promptly report this to the Department within 48 hours of learning of the event. 64-4.208(4)(a). This report will include: the name of the arrested individual, their position or job title, and a copy of the arrest report. 4.208(3)(b). If the department determines the individual is ineligible to serve as an employee, owner, or manager, we will promptly terminate their employment within 24 hours of such notification from the Department. 64-8(4)(b).

### **Employee Training**

We have produced standard operating procedures outlining comprehensive employee training programs. 64-4.002(2)(a)(25). All employees will be trained in, and have access to, our alcohol and drug-free workplace policy. 381.986(8)(f)(9), F.S. Additionally, all employees will be trained on the legal requirements to dispense marijuana to qualified patients. 381.986(8)(e)(5), F.S. More specifically, these trainings will include how to use the medical marijuana registry and medical marijuana registry identification cards to confirm a patient’s authorized status, quantity limits, and prohibit sales to unauthorized individuals, as well as the proper tracking and documentation of all medical marijuana transactions. Employees will be trained in the proper dissemination of product information such that they will avoid the unlicensed practice of medicine and know the penalties stemming therefrom.

Furthermore, to maintain a safe working environment, Director of Retail and/or our Director of Security (as appropriate) will train employees on conflict resolution, violent incidents, and other

emergencies before beginning work at our facility, and annually thereafter. First, employees will be trained on the **Stop-Think-Act** model, which promotes individuals to (1) **stop** - calm down to clearly look at the problem, (2) **think** – analyze the problem by asking yourself a series of questions, and (3) **act** – decide and ask whether the problem still exists. If so, employees will be trained on the **CLUES** approach, which entails: **C**ommunicating promptly, assertively, and responsibly; **L**isten to the others point of view; **U**nderstand their perspective; **E**xplore options and solutions; and **S**o, how did it go. If a conflict requires the involvement of third parties, as part of Island Farms’ open-door policy, employees will be advised to report the problem to the HR department.

All employees will complete training on the types of emergencies that may occur in the facility and the proper response procedures for each emergency. To better aid the prevention of violence, unintentional injuries, or other emergencies, Island Farms prohibits employees and any other person entering our facilities from possessing any object considered a weapon to the extent permitted by applicable law. Management will teach employees the function and elements of our emergency plans, including types of emergencies, reporting procedures, alarm systems, and evacuation plans. Employee training will cover individual roles and responsibilities; threats, hazards, and protective actions; notification, warning, communications, and reporting procedures; evacuation and shelter procedures; basic first aid; and hierarchy and accountability during an emergency. Staff will be retrained whenever emergency plans are revised or updated, when facility layout or evacuation routes are altered, or when new equipment or hazards are introduced into the workplace. Employees will also complete thorough training on our fire safety plans. We will regularly conduct fire and emergency drills so that employees are familiar with procedures and functionality of emergency equipment, such as fire extinguishers and fire alarm mechanisms.

Because we plan to perform solvent-based extraction, before performing any such extraction, we will train relevant employees in SOPs and the safe use of our closed loop system. We will maintain documentation of these training courses and submit it to the Department. 64ER21-13(3)(d), R21-13(11)(a)(1)-(2). We will also prominently display a list of all the names of trained and certified employees outside the solvent-based extraction area. 64E13(11)(b),

Each employee of Island Farms will undergo general training and training tailored to his/her specific role. The CCO will be responsible for overseeing training applicable to every employee, from company benefits to conflict resolution matters. Also, each employee will undergo security training overseen by both the Chief Technical Officer (CTO) and Director of Security (for infrastructure). Finally, each employee will receive operational training from the director of the applicable division (e.g., Director of Retail) following input from Island Farms' CCO. The training will include a review of sections of Island Farms' Standard Operating Procedures (SOPs) relevant to the employee's role and responsibilities.

We will train our employees on procedures for checking identification to prevent unregistered individuals from purchasing medical marijuana and will also train on the proper documentation of medical marijuana transactions. These trainings will address HIPAA, patient education, compliance with all applicable laws and regulations, patient counseling, and data collection. 64-4.002(2)(a)(25)(b)-(d). Finally, we will train all our employees – including our Medical Director – on methods of ensuring that we will never engage in the unlicensed practice of medicine, and we will educate staff on the penalties for violating this protocol.

## **SUBSECTION 4.7.5 – RECALLS**

Our team has considerable experience with the full scope of recall procedures, particularly our Director of Retail, Matthew Kilby and Director of Processing Jakub Pritz, have overseen recall procedures in highly regulated industries for decades. 64-4.002(2)(a)(24). We have developed a compliant plan for the recall of any marijuana or usable product that is, or may be, unsafe for human consumption (as evidenced by testing results, patient reactions, or otherwise); fails to meet the potency requirements of section 381.986(8)(e)8., F.S.; or for which the labeling of tetrahydrocannabinol and cannabidiol concentration is inaccurate. We will never manufacture, sell, deliver, hold, or offer for sale any edible that is deemed adulterated as outlined in section 500.10, F.S. 381.986(8)(e)(8); 5K-11.005(10)(b)(1)(g).

Providing our patients with safe, effective, and accurately labeled marijuana and marijuana products is essential to not only giving them the care they require, but to maintaining our facility's legitimacy and compliance as well. Our plan requires compliance with all product testing and labeling requirements and also includes comprehensive recall measures to prevent unsuitable products from reaching our customers. Therefore, with written notice that any of our marijuana or marijuana products fails to meet the potency standards set forth in Section 381.986, F.S. or an administrative rule, are determined to be unsafe for human consumption, or for which the labeling of the concentrations of tetrahydrocannabinol, cannabidiol, or other cannabinoids is inaccurate, we will promptly institute recall procedures. When this concerns edible products, the recall will extend to all edibles made from the same batch of marijuana. Section 381.986(8)(e)(11)(d), F.S.; Rule 64ER20-35(13), F.C.A. Additionally, any product that has a reasonable probability of causing an adverse health consequence evidenced by patient reaction or any other reason will promptly be recalled. Rule 64-4.002(2)(d)(15), F.C.A.

In instituting recall procedures, we will directly communicate the recall with all affected qualified patients and caregivers as well as issue a press release in a publication that is circulated in the geographical area affected and published on our website. Rule 64ER20-35(13), F.C.A. This press release will include, at a minimum, the product name and batch number of the recalled products, the specific reason for the recall, the location of the dispensing facilities that dispensed the recalled products, an instruction not to consume the recalled products, information on how affected qualified patients and caregivers can return the recalled products, and our contact information for communications regarding the recall. Rule 64ER20-35(13)(a)-(g), F.C.A.

Communications to affected qualified patients and caregivers, press releases, and other documentation of recalls will be recorded, and these records will be maintained within our facility. These records will be made available to the Department upon request.

To maintain the safety of our marijuana and marijuana products, we will comply with regular product testing requirements. When processing our marijuana and marijuana products, we will use a medical marijuana testing facility to confirm that all products meet the statutory definitions and qualifications for cannabinoid and contaminant concentrations. Our employees will review the test results, and, upon confirmation that the products meet all statutory requirements, two employees will sign the results before we dispense the products. Section 381.986(8)(e)(11)(d), F.S. We will fully cooperate with all department checks and random sampling, and we will reserve two processed samples from each batch and retain them for at least 9 months. Section 381.986(8)(e)(11)(d), F.S.

We will maintain a staff that is well-versed on our protocols and standard operating procedures for recalls. This will entail trainings on these procedures covering what justifies a product recall, how to handle a customer reporting an adverse reaction to a product, how to handle questions

concerning recalled products, and how to accept returns for recalled products. These trainings may also include mock recall exercises that would equip our employees with real experience in handling these issues. These trainings will be documented and reported to the Department.

Upon the return or possession of a recalled product, the product will be treated as marijuana waste. Accordingly, it will be processed and disposed of in a manner rendering it unusable and unrecognizable or irretrievable, outlined in subsection 4.7.3 of this application. If, however, the recall was initiated due to an authorized patient reporting an adverse reaction, the product may undergo further testing before disposal.

#### **SUBSECTION 4.8.1 – EXPERIENCE IN THE MARIJUANA INDUSTRY (APPLICANT)**

CEO, Terry Snow: In 2017, Terry co-founded CannaMD, a leading medical cannabis service provider in Florida. Terry used his 45+ years of experience as a media industry leader to guide CannaMD into the patient-centric, compliance-based firm that it is today. The company currently has 23 locations in Florida, 17 physicians, and a staff of nearly 100. CannaMD is focused on evidence-based application of medical cannabis research and provides patients with a plethora of free educational resources. CannaMD's mission is to provide alternative medicine to patients in need and is proud to feature a network of compassionate, experienced doctors. CannaMD is actively involved in the medical community, and serves as a local, educational resource for area physicians and medical professionals. Lesson Learned: As a business leader, Terry has learned that the cannabis industry shares many aspects with other industries and that he is able to leverage his decades of business acumen to help increase access to a necessary and beneficial medicine. COO, Larry Barr: Larry is the co-founder of a popular hemp brand called Island Girl, which has successfully grown hemp and processed pre-rolls, flower, edibles, and vaporizers for the last several years. Larry has been in the plant business for over 40 years, and ran his first farm, Miracle Farms, which was successful for ten years, before opening Island Tropical Foliage 20 years ago. Tropical Foliage now grows on 35 acres and is the leading company exporting plants throughout the Caribbean. The company has about 100 employees, and their sales were \$10 million in 2022. Larry's entire life has been devoted to growing and selling plants, and with a lifetime of experience compliantly running businesses that cultivate, process, and distribute plants, including cannabis and hemp, Larry will make an excellent Chief Operating Officer for our MMTC. Lesson Learned: After running plant-touching businesses for almost half a century, Larry has learned some invaluable lessons, such as being flexible in the face of change and remaining compliant above all

else. For example, when met with unfavorable growing conditions and market opportunity, Larry was able to pivot to a place of profitability where others failed.

Director of Cultivation, Matthew W. Barr: Matthew is an experienced horticulturist with a proven track record of optimizing yields and running large projects that have implemented many plans similar to ours in Subsection 4.4.1. He has years of experience in plant cultivation on an industrial scale and is skilled in crop management, plant nutrition, irrigation systems, and pest and disease management. He is also a certified arborist, plant nutritionist, and lab director and technician. Barr has extensive experience in the cannabis industry, specializing in hemp growing and vegetation management for electric utility companies. As a partner at Island Girl, he managed the hemp grow operation, including fertilization, tracking nutrient levels, pH, watering, drying, and curing. He oversaw a cultivation crew, enabled tracking of waste and efficiency, and ensured product quality by testing every batch. Barr is also the principal of Sueno Farms, where he retrofitted 20,000 square foot space to produce 2.5 million ornamental cuttings a year. He also mastered the growing times, seasonal variation, fertilization, and pH needs of over 70 species of plants in under one year and implemented a crop management and tracking system. Lesson Learned: As an experienced cannabis cultivator, Barr learned that experimenting with different strains reveals unique growing styles, and he will select strains for us depending on our end goal for the flower. One of Barr's greatest challenges has been growing outdoors due to unpredictable elements such as weather and pests, which is why we will utilize a protected growing space with detailed Integrated Pest Management strategy, potentially using biological controls.

Director of Processing, Jakub Pritz, Ph.D.: Jakub is a compliance-oriented professional with a strong background in physics, including a doctorate in Applied Physics from the University of South Florida. He has extensive experience in the cannabis industry, serving in various

leadership positions and has implemented numerous Processing Plans similar to ours in Subsection 4.5.1. As Compliance Director at Creative Flavors, Jakub created the framework for the company's cannabis operation, established security protocols, and set up inventory tracking through METRC. As Compliance Coordinator at Big Trip Manufacturing, Jakub was responsible for keeping licenses and permits updated and renewed, providing in-production insights, and creating compliant workarounds to resolve compliance issues. As Manufacturing & Science Director at Tikun Olam, Jakub oversaw production of products in a GMP environment, managed QA/QC procedure and equipment maintenance, oversaw analytics, and was responsible for working with extraction and manufacturing equipment and methods, including CO2 extraction, winterization, filtration, solvent recovery, and distillation. He also oversaw product formulation and coordinated between departments to optimize workflow and maintain product inventory.

Lesson Learned: Over the course of Jakub's robust cannabis career, he has learned that attention to detail and strict adherence to regulations are critical to success in the industry.

Medical Director, Vincent Jarvis, MD, MPH: Dr. Jarvis is a medical doctor with extensive experience in internal medicine and public health. He earned his Doctor of Medicine from Mount Sinai School of Medicine, a Master's in Public Health from Columbia University School of Public Health, and a Bachelor of Science from the School of Biomedical Education at CUNY. He is a qualified physician for medical marijuana in Florida, with over four years of experience in the field. Dr. Jarvis serves as a physician for CannaMD, which provides medical cannabis recommendations to qualified patients in Florida. He is committed to maintaining accurate medical records and complying with all state and federal regulations related to medical marijuana. Dr. Jarvis will provide expert medical insight and leadership and has worked in various similar capacities in his career, including as a medical director, chief medical officer, and clinical mentor.

Lesson Learned: With four years' experience making medical marijuana recommendations, Dr. Jarvis has remained diligent when it comes to educating himself on medical cannabis in an effort to best serve his patients and community. He truly recognizes the need for ongoing education and research to stay informed on the latest advancements in medical cannabis and provide the highest level of care to patients.

Retail Director / Dispensary GM, Matthew Kilby: Matthew is an accomplished operations leader with over 10 years of experience in building and growing teams in various industries, including cannabis and consumer retail, and he has implemented numerous Dispensing Plans similar to ours in Subsection 4.6.1. Kilby is recognized as a cannabis compliance expert and is an Instructor of Cannabis Compliance at St. Louis University's Cannabis Science and Operations Program. He is currently the Senior Director of Operations at Real Cannabis Co., where he is responsible for defining and deploying operational processes and strategy across multiple facilities. Kilby was recruited as Chief Operating Officer to develop the retail branch of a hyper-growth cannabis startup, and his exemplary performance led to a quick promotion to his current role. Kilby's cannabis industry experience spans retail, cultivation, processing, wholesale, compliance, and marketing. At Billo Premium Cannabis, Kilby served as Head of Operations, where he developed retail, P&L analytics, HR, brand growth, compliance, and wholesale business development. He set the company vision and helped build the brand, accelerating growth from \$0 to \$4.5M and 0 to 40 employees during his tenure. Lesson Learned: As a retail cannabis expert, Matthew has learned to always focus on supporting the well-being of his team while simultaneously delighting his customers. Countless times in this industry, he has succeeded because of the drive and compliance-focused mindset of his passionate team, and he will bring that same mentoring spirit to our organization.

CFO, Albert J. Schulman: Al is the Chief Financial Officer and Chief Operations Officer at ComCan Healthcare, LLC, a medical practice in Delray Beach, FL, that provides certification for patients to Florida's Office of Medical Marijuana Use. With extensive knowledge of medical marijuana laws and regulations, including registry operations and physician requirements, Schulman has a strong working relationship with several MMTCs regarding product offerings and patient issues. He also completed the Hemp Food Establishment licensing process and has a strong knowledge of CBD regulatory requirements, product offerings, and cannabis legal distinctions. Lesson Learned: As a financial expert with medical marijuana experience, Al has learned the cannabis industry requires a unique approach to financial management. With constantly changing regulations and a volatile market, he understands the importance of being adaptable and staying up-to-date on industry trends.

Director of Security, Trei McMullen: Trei McMullen is an accomplished security professional and experienced veteran with a history of designing and implementing state-of-the-art security solutions for the cannabis industry and has implemented numerous Security Plans similar to ours in Subsection 4.7.1. McMullen plays an active role in the ASIS Technical Cannabis Committee, working to create a national standard for cannabis security. As the CEO of SYOTOS LLC, a Florida-based Service-Disabled Veteran Owned Small Business, McMullen has led the company's growth into a national organization with a comprehensive range of security capabilities, including unarmed and armed security and executive protection. Lesson Learned: As a cannabis security expert, Trei has learned to stay in front of threats by integrating security aspects into initial facility design, equipment layout, and staff training. Trei's prior knowledge will allow us to deter and mitigate risk to our cannabis company and community.

#### **SUBSECTION 4.8.2 – OTHER RELEVANT EXPERIENCE**

CEO, Terry Snow: Terry is a renowned media industry leader, entrepreneur, and CEO with over 45 years of experience in retail sales, business, and regulated industries. In 1978, he founded World Publications, a leading publisher of water sports, travel, and lifestyle magazines. Over the years, he expanded his business through acquisitions, producing television programs, and operating web sites based on its publications. Revenue was bolstered by events and broadcasting properties, including pro tours, World Championship events across the Caribbean and Mexico, and shows and competitions. In 2017, Terry Snow helped found CannaMD, one of the leading cannabis medical service providers in Florida, where he led the company to become the patient-centric, compliance-based firm it is today.

COO, Larry Barr: Larry is the owner of Island Tropical Foliage, a leading company that exports plants throughout the Caribbean. With over 20 years of experience in the horticulture industry, Barr has a strong background in regulated industries, agriculture, commercial manufacturing, and secure inventory tracking and control. His career began at Margo Farms, where he worked as a grower and sales manager before opening his first farm, Miracle Farms, which was successful for 10 years. Island Tropical Foliage now grows on 35 acres and has a customer base that includes architects, resorts, landscapers, and independent garden centers throughout the US. Barr has also expanded into the hemp industry with his Island Girl brand, offering a variety of hemp products such as pre-rolls, flower, gummies, and vapes.

CCO / General Counsel, Frank Kruppenbacher: Mr. Kruppenbacher is a uniquely gifted attorney based in Orlando, Florida, with extensive knowledge in regulated industries and compliance. He graduated magna cum laude from Mount Saint Mary's University in Emmitsburg, Maryland, and cum laude from New York Law School. Mr. Kruppenbacher has clerked for several judges,

including the Honorable Arnold Fraimon and Honorable Stanley Lesser. He was appointed to the Florida Commission on Ethics by House Speaker Marco Rubio in 2008 and previously served on The Florida Commission on Sales Tax Reform as appointee of Governor Jeb Bush. He has also served as Chairman of the Greater Orlando Aviation Authority, President of the Greater Orlando Chamber of Commerce, and held positions on several other boards and committees.

CTO, Adam Taylor: Adam Taylor is a seasoned information technology professional with over 18 years of experience in web and search engine optimization, networking, and website security. He is the CEO of Unified Gurus, a Florida-based company that provides website development, internet marketing, and website security services globally. He is also the Chief Technology Officer and Board of Directors member of CannaMD, Florida's premier chain of medical cannabis clinics. Under Adam's leadership, CannaMD has grown from a single location to a regional network of 23 locations and over 100 employees. Adam has extensive expertise in secure inventory tracking and control, including dealing with protected health information (PHI) under the Health Insurance Portability and Accountability Act (HIPAA) and compliance with industry standards and regulations. He has provided consulting and services to reputable companies such as Nissan, Carfax, Experian (AutoCheck), Black Book, Galves, CoPart, IAA, and Peddle.

CFO, Albert J. Schulman: Albert has a strong background in finance and risk management. He serves as the Chief Financial Officer and Chief Operations Officer of ComCan Healthcare, LLC, a medical practice providing certification for patients seeking medical marijuana in Florida. He has extensive knowledge of medical marijuana laws and regulations, developed strong working relationships with several MMTCs, and completed the Hemp Food Establishment licensing process. Schulman also has a full working knowledge of medical marijuana office operations, including EHR, CRM, and accounting operations. Additionally, Schulman spent over 30 years at

Nationwide Mutual Insurance Company, where he held various executive positions, including Vice President of Enterprise Risk Management and Vice President of Corporate Development. In these roles, he developed and implemented risk management programs, executed complex corporate transactions, and managed financial and analytical functions. Schulman holds an M.S. in Finance from the Sloan School of Management at MIT and a B.A. in Biology. He has also taught graduate-level courses on risk management, risk analysis, and risk modeling at Fisher College of Business, The Ohio State University.

Director of Cultivation, Matthew Barr: Matthew has extensive experience in horticulture, agriculture, plant cultivation, and crop tracking in high-volume facilities. He also worked as a lab director and technician, where he used strong analytical and problem-solving skills in researching, analyzing, investigating, proposing solutions to technical issues, gathering, converting, editing, and managing data as well as writing reports. He has proven track record of optimizing yields while implementing automation and running large projects. Barr has been involved in high-level cannabis operations, including Sueno Farms, where he is a principal and Island Girl, where he was a partner, oversaw the grow operation, expanded the customer base from 0 to 25 smoke shops, and created an online store and order management system to manage all orders.

Director of Processing, Jakub Pritz, Ph.D.: Dr. Pritz has nearly a decade of experience in commercial manufacturing in the cannabis industry and has worked with various chemical extraction methods as well as utilizing analytical chemistry and Shimadzu's HPLC and SALD machines to test product samples for quality control and formulation purposes. Dr. Pritz also spent years doing cancer research relating to microbiology, radiation medicine, and applied sciences.

Medical Director, Vincent Jarvis, MD, MPH: Vincent N. Jarvis, MD, MPH is a board-certified internist and a qualified physician in medical marijuana with four years of experience in patient

education and pharmaceutical formulations and dosage forms. He earned his Doctor of Medicine degree from the Mount Sinai School of Medicine and a Master's in Public Health with a concentration in Health Policy and Management from Columbia University School of Public Health. He has almost three decades of experience in regulated industries, analytical chemistry, microbiology, and secure inventory, and has held several leadership roles in the healthcare sector, including Medical Director of Coconut Grove Family Health Center, Chief Medical Officer of the New York Hotel Trades Employee Benefit Funds, Medical Director of Empire Blue Cross Blue Shield/WellPoint, and Director of Medical Services at Mount Sinai Hospital.

Retail Director / GM, Matthew Kilby: Matthew Kilby is a Senior Director of Operations with over 10 years of leadership experience in regulated industries, including cannabis and retail sales. He is also a current instructor of cannabis compliance at St. Louis University. Kilby is a people-first operations leader who has demonstrated a background of entrepreneurship and organizational leadership in various industries. He has extensive experience leading multi-million-dollar P&L and multi-site operations for high-growth cannabis companies. Kilby is a strategic change-maker skilled in identifying and capitalizing on opportunities to enhance operations, drive revenue growth, ensure compliance, and open new business channels. He specializes in operations management, change management, revenue growth, strategic planning, team recruitment and retention, go-to-market strategy, product launch, consulting, mentoring, and communications.

Director of Security, Trei McMullen: Trei McMullen is a qualified security professional and decorated veteran who specializes in designing and implementing top-notch security solutions for the regulated cannabis industry. As the Chief Executive Officer of SYOTOS LLC, a Service-Disabled Veteran Owned Small Business (SDVOSB) based in Florida, he has successfully combined modern technology with established industry standards to provide best-in-class security

services for cannabis operators nationwide. Mr. McMullen maintains strict standards, ensuring that all security personnel under his leadership exceed established federal protective service and Department of Homeland Security qualification standards. With extensive experience in both civilian security and a distinguished career in the United States Army, Mr. McMullen has built a solid foundation for his security planning and implementation philosophy.

Director of Data and Analytics, Mark Crone: Mark is an experienced executive with over 45 years of expertise in a diverse range of industries, including regulatory, manufacturing, and construction. He is an award-winning professional with a strong background in management, marketing, and data analytics. Mark has overseen product design, manufacturing, and component tracking for personal flotation devices regulated by the United States Coast Guard. He has also implemented automated inventory tracking systems for finished goods and work-in-progress in factories. Furthermore, Mark has extensive experience in land acquisition, development, and construction projects, including loan financing and contract negotiation. He has served on various industry boards and committees and has two degrees in mechanical engineering and physics.

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#### **SUBSECTION 4.8.4 - PRIOR ENFORCEMENT ACTION**

**1. The Applicant has NOT previously held a Florida dispensing organization license or MMTC license.**

**2. The Applicant has NOT been previously licensed in another jurisdiction to cultivate, process, or dispense marijuana.**

**2.a.** Not applicable.

**2.b.** Not applicable.

**3. Presented below is a comprehensive list of prior enforcement actions, by individual owners and managers of Island Farms:**

**3.a. Florida-licensed dispensing organization or MMTC enforcement action:** Not applicable.

**3.b. Other jurisdiction enforcement action:**

**Terry Snow, CEO:** None

**Vincent Jarvis, MD, Medical Director:** None

**Al Schulman CFO:** None

**Adam Taylor, CTO:** None

**Matthew Kilby, Director of Retail:** In 2018, during his time as a manager with Billo Premium Cannabis in Steamboat Springs, Colorado, one of their retail locations was broken into overnight. During the police investigation, it was discovered that one of the store's exterior security cameras was not programmed correctly to store video of sufficient quality. Billo self-reported to the MED and received a "warning". No penalty or fines were assessed.

**Trei McMullen, Director of Security:** None

**Matthew Barr, Director of Cultivation:** None

**Jakub Pritz, Director of Processing:** In 2021, Jakub's employer, Big Trip Manufacturing of California, received a citation from the California Department of Cannabis Control that resulted from an onsite visit that assessed poor inventory management - unlabeled/mislabeled containers. It's important to note that this violation occurred *prior* to Jakub accepting a leadership role as the Compliance Coordinator. It's also important to note that one of his first responsibilities as the new Compliance Coordinator was to assist the rest of the management team in resolving this violation.

**Frank Kruppenbacher, CCO/General Counsel:** None

**Mark Crone, Director Data and Analytics:** None

**3.c. Other jurisdiction recall:** None

**4.a. Other licenses held by applicant:** None

**4.b. Other license enforcement action:** Not applicable

#### **SUBSECTION 4.9.1 – EXPERIENCE IN THE MARIJUANA INDUSTRY (MEDICAL DIRECTOR)**

Dr. Vincent Jarvis is a highly experienced Medical Director with an outstanding track record in the field of medical marijuana. He has been working as a Florida Medical Marijuana Qualified Physician since 2019 and as a Medical Marijuana Qualified Physician at CannaMD since 2020.

As a Florida Medical Marijuana Qualified Physician, Dr. Jarvis is responsible for conducting thorough evaluations of patients' medical histories to determine if medical marijuana is a suitable treatment option for their condition. He performs a complete history and a physical examination on each patient, requesting and reviewing their medical records. Dr. Jarvis evaluates the patient to determine if Medical Marijuana would be an appropriate treatment within the parameters of the State of Florida and recommends it only if the patient has a qualifying diagnosis. He also performs the evaluation to assess patients' current health status and identifies any underlying medical conditions that may impact the safety or effectiveness of medical marijuana as a treatment option.

Dr. Jarvis has extensive experience in patient education and pharmaceutical formulations and dosage forms, which is vital for the safe and effective use of medical marijuana. Because medical marijuana is available in several different routes of administration, dosages, and strains with different effects and properties, comprehensive patient education is crucial. Dr. Jarvis fully explains the options, effects, and safety factors associated with medical marijuana for each patient. He remains available to all his patients by both email and by phone, and his cell phone number is listed in the OMMU Registry so that patients can access him easily and immediately for any concern or issue.

As a CannaMD Medical Marijuana Qualifying Physician, Dr. Jarvis provides qualified patients with the necessary state-required recommendations for medical cannabis use. CannaMD focuses

on the application of evidence-based medical cannabis research and offers a pre-qualification process to allow more one-on-one time with the physicians. During this process, patients are asked to complete registration and medical history forms prior to their visit and provide medical records that are reviewed by staff at CannaMD, including Medical Assistants, patient liaisons, and Dr. Jarvis. This allows for a more efficient encounter with the physician. Dr. Jarvis guides patients through the entire process of obtaining medical cannabis, providing educational resources along the way, and striving to make the experience as straightforward and stress-free as possible.

Dr. Jarvis provides personalized treatment plans that include dosage recommendations, product suggestions, and advice on how to administer medical marijuana safely and effectively. He recognizes that dosing and administration must be individualized based on several factors that are evaluated during the patient visit. For new patients, generally, beginning at a low dose and proceeding to an increased dose slowly is optimal. Dr. Jarvis also advises patients as to the different times of onset and durations of effect of the various routes. He presents patients with written educational material and monitors their progress, adjusting treatment plans as necessary to ensure that they are receiving the maximum benefit from medical marijuana. Prior to ending any and all patient visits, Dr. Jarvis always asks patients if they have any questions and reminds them that they can email him or call. Additionally, he maintains accurate medical records and complies with all state and federal regulations related to the prescription of medical marijuana. During the recertification process, Dr. Jarvis performs required periodic evaluations of the patients to ensure the proper use of Medical Marijuana and the effectiveness of Medical Marijuana in treating the patient's qualifying condition. Patient reviews of Dr. Jarvis and his staff at CannaMD are at the five-star level. Dr. Jarvis takes pride in delivering high quality health care experience, within the

proscribed regulatory framework, in which patients are cared for safely and effectively and are also highly satisfied.

Dr. Jarvis is proud to work with a network of experienced and compassionate doctors at CannaMD, where patients are provided recommendations for effective and safe treatment with Medical Marijuana. Medical Marijuana improves symptoms and conditions, and over 95% of patients who are initially certified return for recertification. This high follow-up rate and seeing so many patients experience improvement in their conditions and quality of life is professionally rewarding for Dr. Jarvis. At CannaMD, the physicians meet regularly and exchange knowledge and experiences, which helps them to learn and better their skills within the field.

In addition to his work as a medical marijuana physician, Dr. Jarvis has also been involved in clinical and observational studies, particularly during the AIDS epidemic. Earlier in his career, Dr. Jarvis specialized in HIV/AIDS Medicine. He was the director of one of the first dedicated AIDS treatment centers in New York. As medications initially became available, they were often only released through compassionate release programs. Dr. Jarvis registered his practice to obtain compassionate release medications and made these much-needed anti-retroviral medications available to his patients in the AIDS centers that he directed and for which he provided care, including Community Health Centers in Florida. He was involved in Phase 3 and 4 trials as an HIV doctor and Executive Physician and participated in these compassionate release medication programs.

In conclusion, Dr. Vincent N. Jarvis is a highly experienced Medical Director with a deep understanding of the medical marijuana industry. His extensive experience in patient evaluation, education, and pharmaceutical formulations allows him to provide personalized treatment plans to his patients. Dr. Jarvis is proud to work with a network of experienced and compassionate doctors

at CannaMD and a staff focused on helping patients get well. Additionally, he has been involved in clinical and observational studies, particularly during the AIDS epidemic, and was the director of one of the first dedicated treatment centers in New York. His commitment to providing compassionate care to patients in need has made a significant impact on the field of medicine, and his expertise continues to benefit his patients today.

#### **SUBSECTION 4.9.2 – OTHER RELEVANT EXPERIENCE**

Vincent N. Jarvis, MD, MPH, will make an exceptional Medical Director. He has worked with patients suffering from cancer, epilepsy, glaucoma, positive status for human immunodeficiency status (HIV), acquired immune deficiency syndrome (AIDS), post-traumatic stress disorder (PTSD), amyotrophic lateral sclerosis (ALS), Crohn's disease, Parkinson's disease, or multiple sclerosis, and those with terminal conditions. He has over 30 years of experience with these conditions. Dr. Jarvis has treated patients suffering from terminal conditions throughout his entire career in Medicine. He has treated many different conditions, including cancer, heart failure, other organ failure and notably HIV and AIDS. Dr. Jarvis has treated HIV infected patients and has been Medical Director of AIDS Centers for over 30 years. He maintains Board Certification in HIV and AIDS Medicine by the American Academy of HIV Medicine. He is recognized by his peers as a specialist and expert in this field. As the Medical Director of the Substance Treatment Center at Mount Sinai Hospital, Dr. Jarvis was responsible for overseeing the clinical care and treatment of patients struggling with substance use disorders. He worked closely with a team of mental health professionals, nurses, and support staff to provide comprehensive care that addressed both the physical and psychological aspects of addiction. Dr. Jarvis also has a strong focus on patient education, recognizing that education is a crucial component of successful treatment for substance use disorders as well as all medical and mental health afflictions. He is dedicated to helping patients understand the benefits and risks of different treatment options and empowering them to make informed decisions about their care. Dr. Jarvis's experience as the Medical Director of the Substance Treatment Center at Mount Sinai Hospital provided him with a wealth of knowledge and expertise in recognizing and treating drug dependency, abuse, and addiction, as well as diagnosing and treating substance use

disorders. Dr. Jarvis has extensive knowledge of pharmaceutical formulations and dosage forms, having worked as a Medical Marijuana Qualified Physician at CannaMD, where he gained experience in patient education and pharmaceutical formulations and dosage forms. He also has experience dispensing medications and ensuring their quality control. In addition, Dr. Jarvis has been involved in clinical trials and observational studies, particularly during the AIDS epidemic, where he was involved in Phase 3 and 4 trials as an HIV doctor and executive physician through compassionate relief medication programs. Dr. Vincent Jarvis served as the Chief Medical Officer for the New York Hotel Trades Employee Benefit Funds from 2009 to 2018. During his tenure, he oversaw a comprehensive healthcare program with a budget of \$450 million which provided coverage for nearly 100,000 individuals. As both the payer and administrator of the plans and the main provider, he managed numerous healthcare specialties and was second in command to the CEO. Dr. Jarvis was responsible for driving quality and excellence and supervised pharmacy operations, including medication dispensing and inventory control. He earned the National Council for Quality Assurance (NCQA) level 2 designation for Patient-Centered-Medical Home, as well as a recognized Center for Excellence in Diabetic Care. He served as the Director of Quality Assurance, chaired the pharmacy and therapeutics committee, and headed other departments, such as mental health and nursing, with board of director reporting responsibility. As CMO, Dr. Jarvis oversaw all aspects of pharmacy operations, including procurement, inspection, security, chain of possession, transportation, labeling, and dispensing. Dr. Jarvis is also experienced in analytical laboratory methods and quality control, ensuring that his patients receive the best care possible. With his extensive experience in various medical conditions, patient education, pharmaceutical operations and formulations, and clinical trials, Dr. Jarvis is a highly skilled and knowledgeable Medical Director.

## **SUBSECTION 4.9.2 – ADDENDUM**

**VINCENT N. JARVIS, MD, MPH**  
**3161 South Ocean Drive Unit 1408**  
**Hallandale Beach, Florida 33009**  
VJMDNY@YAHOO.COM  
(917) 690-3811

*Education*

**Masters in Public Health**, Columbia University School of Public Health Policy & Management

**Internship/Residency**, Long Island Jewish Hillside Medical Center, Internal Medicine

**Doctor of Medicine**, Mount Sinai School of Medicine

**Bachelor of Science**, School of Biomedical Education, CUNY

*Professional Experience*

- ❖ Florida Medical Marijuana Qualified Physician, 2019-Present
- ❖ CANNAMD, Medical Marijuana Qualified Physician 2020-Present
- ❖ Medical Doctor-Internal Medicine Practice, P/T, 2001-Present
- ❖ Medical Review Officer, P/T, ReviewStat, 2018-Present
- ❖ Chief Medical Officer, New York Hotel Trades Employee Benefit Funds, 2009-2018
- ❖ Medical Director, Empire Blue Cross Blue Shield/WellPoint, 2007-2010
- ❖ Medical Director, CareCore National, 2006-2008
- ❖ Director of Medical Services, Mount Sinai Hospital, 2005-2007
- ❖ Consultant, New York City Department of Health and Mental Hygiene, 2005
- ❖ Clinical Mentor, International Center for Equal Healthcare Access, Vietnam, 2005
- ❖ Chief Medical Director, William F. Ryan Community Health Center, 2004-2005
- ❖ Medical Director, Lutheran Medical Center, Special Populations Program, 2000-2004
- ❖ Attending Physician, Concentra Medical Center, 2000
- ❖ Attending Physician, South Shore Hospital Immunology Clinic
- ❖ Medical Educator, AIDS Education and Training Center
- ❖ Medical Director, Coconut Grove Family Health Center
- ❖ Medical Director, Saint Mary's Center
- ❖ Chief Physician, Montefiore Medical Center- Rikers Island Health Service
- ❖ Medical Director, Long Island Jewish Hillside Medical Center, Substance Abuse Treatment
- ❖ Program; Attending Physician- HIV/AIDS Clinic; Attending Physician- Employee Health Service

*Licensures/Certifications/Appointments/Affiliations*

- ❖ Medical Marijuana Qualified Physician
- ❖ American Board of Internal Medicine Board Certified
- ❖ HIV Specialist, AAHIVM
- ❖ Florida State Medical License
- ❖ Drug Enforcement Administration Certified
- ❖ New York State Medical License
- ❖ Mount Sinai Hospital Dept. of Medicine, Asst. Professor, 2006-2008
- ❖ American College of Physicians

*\*Publications and References Available Upon Request*

### **SUBSECTION 4.9.3 – OVERSIGHT**

Our medical practices are based on comprehensive research and science-based care of our qualified patients. Our Medical Director, Dr. Vincent Jarvis, will supervise our medical marijuana activities. Section 381.986(8)(b)(9), F.S. Dr. Jarvis has completed all training courses outlined by the State of Florida and has prior experience working directly with medical marijuana patients, as described more thoroughly in 4.9.1 and 4.9.2. Dr. Jarvis has also successfully completed a two-hour course and subsequent examination offered by the Florida Osteopathic Medical Association, which encompasses the requirements of this section and any rules adopted hereunder. 381.986(3)(c)

#### **Scope of the Medical Director's Responsibility**

Dr. Jarvis has an active, unrestricted license as a physician, will provide valuable medical expertise to guide our company's research and development of products, as well as aid in the creation of patient educational materials and support staff training programs based on current scientific research and patient feedback. His role will also involve advising the advisory board, executive team, and other company leadership on significant medical and industry advancements relevant to operations.

In accordance with Florida Statute 381.986(1)(i), our Medical Director will always maintain an active and unrestricted license as an allopathic or osteopathic physician. Dr. Jarvis, our current Medical Director, is an allopathic physician. To ensure that our MMTC operates in accordance with the highest standards, we have developed a comprehensive plan for Dr. Jarvis to oversee its activities, as required by Florida Administrative Code 64-4.002(2)(h)(16). With the guidance and expertise of Dr. Jarvis, our medical director, we are committed to providing products and services

that meet the needs of our patients while adhering to current medical best practices. To achieve this goal, Dr. Jarvis will be responsible for several tasks.

First, he will create and review standard operating procedures (SOPs) for patient communications, HIPAA compliance, product recommendations, palliative care suggestions, recognizing and addressing negative reactions and substance abuse, and safe medical marijuana use, among others. Dr. Jarvis will leverage his medical expertise and knowledge of best practices to develop patient care policies and procedures. It is important to note that he will never make recommendations directly to our customers and will remain unaffiliated with ordering physicians to remain objective about each patient.

Second, Dr. Jarvis will train staff on the SOPs and on new developments in cannabis medicine. He will stay up to date on cannabis science and research and relay that information to our employees during regular training sessions. Ongoing education will be a significant aspect of his work, and he will attend classes, seminars, events, and courses throughout the year to stay current on emerging cannabis science.

In addition to training and education, our medical director will consult with our production teams on product creation to best serve our patients' needs. Dr. Jarvis will contribute his knowledge of modern medicine and the latest and most reliable cannabis science to help us maintain a high degree of consistency in our cultivation and processing products. His experience with the research and development of pharmaceuticals provides him with an excellent background for helping us to create quality products.

Finally, Dr. Jarvis will create educational materials for patients and the community at large to inform them about the benefits and side effects of medical cannabis products. This effort will

ensure ongoing patient and community safety, as well as help us to fulfill our mission to provide high-quality, safe, and effective medical cannabis products.

### **Employing a Medical Director without Lapse**

We have established a multi-faceted plan to ensure we have a medical director at all times. 64-4.002(2)(h)(17). First, we will require our Medical Directors to give notice of leaving their position to our CEO at least 30 days prior to departure in order to give us time to find a suitable replacement.

In the event of an unexpected resignation, death, accident, or other event which renders our Medical Director incapable of continuing in their position, our full staff will always include at least one employee who can fulfill the role of Medical Director, and we already have a doctor who is ready, willing and able to assume duties should the need arise, Dr. David Boyer. Importantly, we are connected with several executive recruiting companies for the cannabis industry, such as H2 talent, that can assist in placing high-level cannabis employees and leadership almost instantly, including Medical Directors.

If we do require a change in Medical Director, we will submit a request to the department using Form DH8019-OMMU-11/2018, “Medical Marijuana Treatment Center Variance Request.” 64-4.023(2). We will not hire a new Medical Director prior to that individual passing a required background screening. 64-4.023(5).

### **Staying Current on Emerging Science and Best Practices**

Our Medical Director will stay current and up to date on emerging science and best practices related to medical marijuana to ensure our products are appropriate and safe for qualified patients. There are several strategies our Medical Director will employ to stay current on emerging science and best practices related to medical marijuana, such as attending conferences and seminars,

joining professional associations, reading scientific journals and publications, collaborating with experts, and utilizing online resources. Our Medical Director, Dr. Vincent Jarvis is already doing many of these. In his new role, he will also subscribe to research publications and will setup alerts to be notified when relevant medical or scientific information about cannabis is published.

A main function of our Medical Director is to educate the company and public by developing educational materials, hosting training sessions for our staff, participating in industry events, utilizing our social media team and channels, and collaborating with the medical community. Since the cannabis industry is constantly evolving, staying current on emerging science can help inform product development, ensuring that products are safe, effective, and meet patient needs. Our Medical Director will lead internal training sessions for all staff at least annually and as needed when significant medical developments arise. Our Medical Director will work closely with our marketing team to ensure our materials are educational, accurate, and timely in relation to emerging science. To continuously implement best practices, our medical director will monitor adverse events and side effects with cannabis-based products in our business and elsewhere.

In addition to remaining up to date, Dr. Jarvis will use his knowledge to consult on our procedures and processes, including cooperating with our quality assurance and control agents to ensure all products undergo comprehensive testing. The Medical Director's research will also play a critical role in developing dosing guidelines and informing product formulations. Importantly, our executive and operational teams will communicate regularly with our Medical Director so our leadership can attain a deep understanding of the latest research and discoveries in cannabis science and medicine. By staying current on emerging science and sharing our findings, Dr. Jarvis will position our company as a thought leader in the industry, building trust and credibility with patients, regulators, and other stakeholders.

#### **SUBSECTION 4.9.4 – MANAGING CONFLICTS OF INTERESTS**

Our business will operate as a vertically integrated Medical Marijuana Treatment Center (“MMTC”) with a Medical Director to supervise our activities. 381.986(8)(b)(9), F.S.; Rule 64-4.002(2)(h). We will have a Medical Director at all times. Rule 64-4.002(2)(h)(17).

Before being employed as a Medical Director, and before each license renewal, our Medical Director will successfully complete a 2-hour course and subsequent examination offered by the Florida Medical Association or the Florida Osteopathic Medical Association which encompass the requirements and any rules adopted hereunder. 381.986(3)(c), F.S. Upon award of license, our Medical Director will relinquish his status as a Qualified Physician.

Our Medical Director will refrain from self-referrals and always follow ethical guidelines set forth by the American Medical Association (AMA) or the Florida Medical Association (FMA) to ensure that he is following their ethical guidelines. Upon request, our Medical Director can present a list to the Department of ordering physicians, making these claims verifiable.

Our Medical Director will avoid accepting gifts from any pharmaceutical or healthcare companies. Further, we will not accept engagements that are promotional in nature on behalf of other companies. Our Medical Director will supervise our activities and will present unbiased factual and science-based education to our owners, managers, employees, and patients. Our other medical staff will also refrain from any relationships with ordering physicians that could result in kickbacks. We value the quality of patient care that we deliver and will not engage in conflicts of interest.

**SUBSECTION 4.9.5 – MEDICAL DIRECTOR ACKNOWLEDGMENT AND  
CERTIFICATE OF COURSE COMPLETION**



**FORM 4: MEDICAL DIRECTOR ACKNOWLEDGMENT**

I, Vincent Jarvis, have consented to be employed as the medical director for Island Farms, Inc, 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):

Vincent Jarvis, MD

Signature:

VINCENT JARVIS

VINCENT JARVIS (Apr 23, 2023 07:44 EDT)

Florida MD or DO License #:

ME67064



# FMA

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## Accreditation PROGRAM

How Physicians Earn Quality CME

### Florida Medical Association

Certifies that

Vincent Nathan Jarvis

*has participated in the enduring material titled*

**Florida Medical Marijuana Course for MMTC Medical Directors**

**on 4/20/2023 1:25 PM 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.

## **SUBSECTION 4.10.1 – PERSONNEL QUALIFICATIONS**

Island Farms will be staffed by the best-suited individuals the medical, marijuana, and business spheres can offer to navigate the complex medical marketplace and remain in compliance with state and local rules. We have selected key individuals to fill the positions necessary to our medical operation. Each of the individuals below exceed the qualifications mandated to complete the duties and responsibilities of their respective roles. Our necessary positions, retained persons, and duties and responsibilities for each necessary position are as follows. Our full Organizational Chart is located in the Appendix.

### **Necessary Positions Filled**

#### Chief Executive Officer (“CEO”) — Terry L. Snow

Terry Snow is a media industry leader, CEO, and entrepreneur with over 45 years of experience. He founded World Publications in 1981, which became a leading publisher of water sports, travel, and lifestyle magazines, before selling the company to Bonnier AB in 2007. In 2017, he helped found CannaMD, one of the leading cannabis medical service providers in Florida, using his leadership experience to guide the company. Snow holds a BA in Finance from the University of Florida. Our CEO, Terry, will oversee the senior planning and leadership teams to execute the strategic direction of the company and guides all staff efforts toward achieving company objectives and defined goals. He will also oversee financial management and strategic production plans, provides oversight for all branches of the company, and institute a company culture in line with our mission. Our CEO will provide complete oversight of all branches of the company; ensure compliance and adherence to SOPs; coordinate marketing to develop branding components; and, evaluate and manage the fiscal and operational performance of the company.

#### Chief Financial Officer (“CFO”) (Reports to CEO) — Albert J. Schulman

Albert Schulman is the Chief Financial Officer/Chief Operations Officer at ComCan Healthcare, LLC, a medical practice providing certification for Florida's medical marijuana patients. He has extensive knowledge of medical marijuana laws and regulations, including registry operations and physician requirements. Prior to this, he worked for Nationwide Mutual Insurance Company in various executive positions, including Vice President of Enterprise Risk Management and Vice President of Corporate Development. Schulman holds a Master of Science in Finance from MIT and a Bachelor of Arts in Biology from the University of Rochester. He also taught a graduate-level course on risk management frameworks, risk analysis, and risk modeling at Fisher College of Business at The Ohio State University. Our CFO, Albert, is responsible for all financial activities including building the core financial practices to expand company operations. The CFO also oversees all accounting personnel and third-party accounting, tax preparation, and financial services vendors. The CFO will mainly oversee all financial functions of the company; create and implement a company budget and departmental budgets; develop and maintain relationships with financial institutions; and, audit work of bookkeepers and accountants for accuracy and consistency with Generally Accepted Accounting Practices.

Chief Operations Officer ("COO") (Reports to CEO) — Larry Barr

Larry has been devoted to growing and selling plants for over 40 years. He successfully ran his first farm, Miracle Farms, for ten years before opening Island Tropical Foliage 20 years ago, which now grows on 35 acres and is the leading company exporting plants throughout the Caribbean. In the last several years, Larry has co-founder a successful hemp brand called Island Girl, which produces hemp pre-rolls, flower, edibles, and vaporizers. As the COO of our MMTC, Larry will manage operations, including development of standard operating procedures and staff training programs. Our COO will analyze current and future market trends to help lead management to

achieve goals and objectives of the company. The COO works with branch leadership teams to create and implement production plans, select equipment and materials, and assist in selecting vendors and services. The COO will develop and implement compliant standard operating procedures; support the operations of the cultivation, manufacturing, and retail teams; assist with developing staff training programs; identify areas of cost savings; source equipment and vendors; and, coordinate audits.

Chief Compliance Officer (“CCO”) (Reports to CEO) — Frank Kruppenbacher, J.D.

Frank Kruppenbacher is an attorney based in Orlando, Florida. He graduated magna cum laude from Mount Saint Mary's University in Emmitsburg, Maryland and cum laude from New York Law School. Mr. Kruppenbacher has held various positions including serving as Chairman of the Greater Orlando Aviation Authority and as President of the Greater Orlando Chamber of Commerce. He was appointed to the Florida Commission on Ethics by House Speaker Marco Rubio and previously served on The Florida Commission on Sales Tax Reform as an appointee of Governor Jeb Bush. He has also been recognized with awards such as the Special Service Award from the Florida High Schools Interscholastic Athletics Administrations Association. Our CCO, Frank, will ensure daily operational compliance by developing, maintaining, and continuously improving upon a comprehensive compliance program designed to ensure that every level of the operation acts within the federal, state, and municipal regulations. The CCO also acts as the communication link between our MMTC and the regulators when implementing any changes that the state or local jurisdiction needs to be notified of. The CCO will manage license, bond, and permit application and renewal process; monitor all relevant laws and update our SOPs to ensure all cultivation, processing and retail operations always remain compliant; audit company

inventory, systems, and reports for accuracy and consistency; maintain records as required by state and federal regulation; and, contribute to staff training materials and compliance tools.

Medical Director (“MD”) (Reports to CEO) — Vincent Jarvis, M.D., M.P.H.

Dr. Vincent N. Jarvis, M.D. specializes in internal medicine and health policy and management. He received his Doctor of Medicine from the Mount Sinai School of Medicine and a Master’s Degree in Public Health from the Columbia University School of Public Health. He is board certified by the American Board of Internal Medicine and is also an HIV Specialist with more than 10 years of experience. He is a Florida Medical Marijuana Qualified Physician with extensive experience in patient education and pharmaceutical formulations and dosage forms. Dr. Jarvis has worked in a variety of roles throughout his career, including as the Chief Medical Officer for the New York Hotel Trades Employee Benefit Funds, Medical Director for Empire Blue Cross Blue Shield/WellPoint, and as an Attending Physician at various medical centers. Our Medical Director, Dr. Jarvis, will provide medical expertise to our company to guide research and the development of products, aid in creation of patient educational materials, and support staff training programs based on patient feedback. The Medical Director will update the advisory board, executives, and company leadership on significant medical and industry advancements relevant to operations. Our Medical Director will apply his medical expertise and knowledge of medical cannabis best practices to develop patient care policies and procedures; develop educational materials for staff, patients, and community members about research and side effects of medical cannabis products; coordinate with the Community Outreach team to participate in and develop community outreach initiatives; and, train staff to comply with applicable medical regulations.

Director of Cultivation (“DOC”) (Reports to COO) — Matthew Barr

Matthew Barr is an experienced horticulturist with a proven track record of optimizing yields while implementing automation and running large projects. He earned his Associate's Degree in Environmental Science from Santa Barbara City College and has a PDSO Certificate of Proficiency in Security Training. He is a certified arborist, plant nutritionist, and an IoT developer. He has expertise in crop management, plant nutrition, irrigation systems, and pest and disease management. He is the principal at Sueno Farms where he is executing technology to grow more than 70 species of plants and a partner at Island Girl where oversaw the cultivation crew. He was also a utility forester and work planner at ArborMetrics Solutions, LLC. Our DOC, Matthew Kilby, will oversee our cultivation processes to achieve production goals and company objectives while staying compliant with regulations and maintaining employee safety. The DOC creates standard operating procedures based on cultivation best practices and legal requirements to ensure staff maintain the ideal state of plants in all stages of growth. The DOC will manage day-to-day cultivation operations and provide hands-on management of each stage of production from propagation to distribution at the cultivation facility; develop proprietary formulas for cultivation, including cultivation method, nutrient formulas, watering, pruning, and light schedules; develop and oversee training programs for all cultivation employees; and, ensure cultivation methods and procedures comply with all applicable laws and regulations.

Director of Processing (“DOP”) Reports to COO— Jakub Pritz, Ph.D.

Dr. Pritz has a Ph.D. in Applied Physics from the University of South Florida and worked as a Postdoctoral Research Fellow at UCSD Radiation Medicine and Applied Sciences. He is a detailed-oriented professional with heavy cannabis processing experience. Dr. Pritz has worked as a Compliance Coordinator for Big Trip Manufacturing, oversaw production in a GMP environment for Tikun Olam as Manufacturing & Science Director, and created and developed product

formulations and delivery methods for cannabinoids as a consultant for American Scientific Consultants. His experience includes creating compliant SOPs, overseeing quality control procedures, and managing equipment and inventory throughout the manufacturing process. Our DOP, Dr. Pritz, will oversee management of the extraction laboratory and processing spaces ensuring the facility produces medical cannabis products that meet our stringent quality and consistency standards. The DOP creates the standard operating procedures to maximize the efficiency of extraction processes and maintain the safety and security of the facility. The DOP will oversee all extraction processes and train and manage extraction staff; oversee research and development to formulate new products; design and set up extraction laboratory, including equipment choice and setup; develop and implement compliant processing standard operating procedures in accordance with relevant law and industry best practices; and, ensure products adhere to quality control standards.

Retail Director / Dispensary GM (“GM”) (Reports to COO) — Matthew Kilby

Matthew Kilby is a cannabis retail expert with nearly 10 years of cannabis-specific leadership experience. He is an instructor in the Cannabis Science and Operations Program at St. Louis University and completed coursework in Aviation Technology at Colorado Northwest Community College. Matthew has led multimillion-dollar P&L and multi-site operations for high-growth cannabis companies and brings broad cannabis industry experience spanning leadership over retail, cultivation, processing, wholesale, compliance, and marketing. He has expertise in operations management, change management, revenue growth, strategic planning, team recruitment and retention, go-to-market strategy, product launch, consulting, mentoring, and communications. Matthew has held leadership roles in several companies, including Real Cannabis Co. as Chief Operating Officer, Billo Premium Cannabis as Head of Operations, and Green Tree Medicinals as

Compliance Manager. Our Retail Director, Matthew Kilby, will oversee our medical marijuana retail dispensing locations and staff. He will plan and manage all aspects of day-to-day retail operations, including hiring personnel, training staff in sales and customer satisfaction, ensuring inventory control, and overseeing the daily procedures of all store-related matters while adhering strictly to state and local guidelines and regulations. Our Retail Director will also communicate executive directives to dispensary management and staff and regularly report to the executive team on retail trends and strategy, inventory needs, and sales and staff performance.

Director of Security (“DOS”) (Reports to CCO) — Trei McMullen

Trei is a compliance-focused security professional and military veteran with expertise in designing and implementing cannabis security solutions. He is the CEO of SYOTOS LLC, a national security company that offers best-in-class security solutions for cannabis operators. Trei has an associate degree in Intelligence Operations from Cochise College, a Bachelor of Science degree in Intelligence Studies from American Military University, and a Master of Arts degree in Emergency Management and Homeland Security from Arizona State University. He is also pursuing a PhD/Doctorate in Global Security from American Military University. Our Director of Security, Trei, will design our security strategy and layout, protect assets and individuals on our property and in transit, ensure facility security, and oversee staff security training to create a safe working environment and protect the community. The DOS creates SOPs for security monitoring, maintenance, training, and emergency response, and sets up security protocols to achieve zero losses from diversion or criminal activity and maintain compliance with the state and local regulations. The DOS will maintain relationships with local law enforcement and emergency services to identify the company as a community partner and champion of safe facilities and train

non-security personnel in diversion prevention efforts as part of our continuing anti-diversion plan.

Chief Technology Officer (“CTO”) (Reports to CEO) — Adam Taylor

Adam Taylor is an accomplished information technology professional with 18+ years of experience in web development, search engine optimization, and networking. He is currently the Chief Executive Officer of Unified Gurus, a Florida-based website development, internet marketing, and website security company, and the Chief Technology Officer of CannaMD, Florida's leading medical cannabis clinics. With a thorough understanding of the Health Insurance Portability and Accountability Act (HIPAA) and the Medical Marijuana Use Registry, Mr. Taylor is a seasoned expert in the cannabis technology space. He has provided consulting services to high-profile clients like Gilbert Arenas, Nissan, Carfax, Experian, and government officials like Malcom Thompson. Our CTO, Adam, is responsible for overseeing the technical infrastructure within the organization and for securing our electronic systems. They will lead IT and staff trainings and determine business requirements for IT systems in order to eliminate IT security risks. Our CTO will manage the design and implementation of IT infrastructure and develop strategy as it relates to information tracking, security, and communication systems. The CTO consults with executives across the organization to identify business and technology needs and to optimize our use of information technology. CTO ensures smooth operation of IT services by monitoring and maintaining systems performances and by creating processes and standards for selection, implementation, operation, and support of IT.

Director of HR (“DHR”) (Reports to CEO) — Lora Crone

As a Florida native, for over 35 years, Lora has worked extensively with small and large businesses in different industries, increasing the performance of the company in each case. Understanding

what motivates people has been a lifelong passion and she has been able to parlay her previous experience in sales and retail to human resource and business planning. She focuses on the health and well-being of the 70+ employees, 17 physicians, 23 locations and multiple vendors while running the office operations as well. Lora graduated from the University of Texas at Austin with her Bachelor's Degree in Journalism with a specialty in Public Relations. Our DHR, Lora Crone, will oversee all personnel related matters, such as hiring, onboarding and offboarding, training, payroll and benefits, recordkeeping of personnel information, background checks, and agent identification cards.

#### Director of Data and Analytics (“DDA”) (Reports to CTO) — Mark Crone

Mark A. Crone is an award-winning executive with over 45 years of experience in data analysis, management, regulatory, and manufacturing industries. He holds a BS in Mechanical Engineering from Columbia University School of Engineering and a B.A. in Physics from Rollins College.

He has implemented inventory tracking systems, led marketing and promotion managers to improve campaign segmentation and analytics, and is an expert in multiple software applications. He has held leadership positions at PADI, Bonnier Corp, and Resource Alliance, Inc. As our DDA, Mark, will oversee the collection, analysis, and interpretation of data related to our operations, products, and customers. Our DDA will use data-driven insights to inform business decisions and help us achieve our goals. He will develop and implement data collection systems, analyze data to identify trends and patterns, develop and present reports to our leadership, collaborate with other departments, and stay up to date on medical cannabis data technology.

#### **Plan to Fill Necessary Positions**

We will follow all State labor regulations in hiring and retaining employees. Chapter 448. All individuals we hire will be subject to background checks and over the age of 21. Rule 64-4.208;

Chapter 381.986(8)(e)(4). While we have filled all necessary positions, we will be prepared to hire for those and other non-necessary positions in case of an opening in the future and have proactively connected with professional recruiting firms, such as H2 Talent, as well as organizations such as the Florida Department of Veterans' Affairs, the Florida American Legion, and the National Black Association, to encourage local and diverse hiring. We will hire individuals, according to our Diversity Plan, with the right experience and background to satisfy Florida's and our business' high standards for compliance.

#### **SUBSECTION 4.10.1 – ADDENDUM**

### Startup Organizational Chart

<b>TITLE:</b>	<b>NAME:</b>	<b>Reports To:</b>	<b>Notes:</b>
Chief Executive Officer ("CEO")			EXECUTIVE TEAM
Chief Operating Officer ("COO")		CEO	DISPENSARY STAFF
Chief Compliance Officer ("CCO")		CEO	CULTIVATION STAFF
Chief Technology Officer ("CTO")		CEO	PRODUCTION/INFUSION STAFF
Chief Financial Officer ("CFO")		CEO	PACKAGING STAFF
Accountant/Bookkeeper	Outsourced	CFO	QUALITY STAFF
Director of HR/Social Equity & Inclusion		COO	FACILITIES STAFF
Director of Data and Analytics		CTO	
Marketing & PR Director	Outsourced	CEO	
Inventory Manager		CCO	
General Manager		COO	
Assistant Store Manager(s) ("ASM")		GM	
Sales Associate(s)		ASM	
Director of Cultivation ("DoC")		COO	
Cultivation Technician(s)		DoC	
Director of Extraction & Infusion ("DoE&I")		COO	
Extraction & Infusion Technician(s)		DoE	
Packaging & Labeling Associate(s)		Packaging & Labeling Manager	
Director of Quality Assurance/Control		CCO	
Director of Security ("DoS")		CCO	
Sanitation Officer		DoF	
Security Officer(s)		DoS	

## Full Organizational Chart

<u>TITLE:</u>	<u>NAME:</u>	<u>Reports To:</u>	<u>Key:</u>
Chief Executive Officer ("CEO")			EXECUTIVE TEAM
Chief Operating Officer ("COO")		CEO	DISPENSARY STAFF
Chief Compliance Officer ("CCO")		CEO	CULTIVATION STAFF
Chief Technical Officer ("CTO")		CEO	PRODUCTION/INFUSING STAFF
Chief Financial Officer ("CFO")		CEO	PACKAGING STAFF
Accountant		CFO	QUALITY STAFF
Bookkeeper		CFO	FACILITIES STAFF
Director of HR		COO	
Director of Government Relations		CEO	
Director of Marketing & PR		CEO	
Director of Social Equity & Inclusion		COO	
Director of Data and Analytics		CTO	
Director of Veterans Outreach		COO	
Inventory Manager		CCO	
Dispensing Operations Director / General Manager		CCO	
Inventory Manager		DoD / GM	
Assistant Store Manager(s) ("ASM")		DoD / GM	
Administrative Support Associate(s)		GM / ASM	
Sales Associate(s)		ASM	
Director of Cultivation ("DoC")		COO	
Cultivation Manager(s)		DoC	
Cultivation Technician(s)		DoC	
Trimming Technician(s)		DoC	
Director of Extraction ("DoE")		COO	
Extraction Manager		DoE	
Extraction Technician(s)		DoE	
Director of Infusion ("DoI")		COO	
Infusion Manager		DoI	
Infusion Technician(s)		DoI	
Packaging & Labeling Manager		CCO	
Packaging & Labeling Associate(s)		Packaging & Labeling Manager	
Director of Quality Assurance		CCO	
Director of Quality Control		CCO	
Director of Facilities ("DoF")		COO	
Facilities Construction Advisor			
Facility Manager/Sanitation Officer		DoF	
Director of Security ("DoS")		CCO	
Security Officer(s)		DoS	

#### **SUBSECTION 4.10.2 – DRUG-FREE WORKPLACE**

We will develop, implement, and uphold an alcohol- and drug-free workplace. This plan describes our alcohol and drug-free workplace policies and practices and will be included as part of our Operations Manual. Section 381.986(8)(f)(9), F.S. We will require all applicant owners, managers, board members, officers, and employees to pass a level-2 background screening in addition to showing that the individual has no arrest awaiting final disposition, a finding of guilt, or a guilty or nolo plea under Florida Statutes Chapters 837, 895, and 896. *Fla. Stat. § 435 (2018); Fla. Stat. § 381.986(9) (2018)*. This screening process will allow us to identify any individuals who may have had past incidents with alcohol and/or drugs, and we will act accordingly to mitigate all risks associated therein. All owners, managers, employees, and volunteers will submit fingerprints to the departments for state (Dept. of Law Enforcement) and national (FBI) processing, and the individual will bear any associated fees.

We will have surveillance cameras in place to monitor and record staff activity continuously. The cameras, along with “Cameras in Use” signs will be in conspicuous areas to discourage staff from engaging in any acts which would violate the maintenance of an alcohol- and drug-free workplace. Management will also monitor staff conduct by observing daily operations and making explicit reports if they suspect any violation of this plan has occurred.

We will prohibit staff from working while under the influence of any drugs or alcohol, including medical marijuana, and all staff will be subject to random drug screenings. The possibility of random drug tests can serve as a deterrent for employees. We will have the proper standard operating procedures (SOPs) in place to guarantee our zero-tolerance policy for alcohol- and drug-use. These SOPs will outline the following steps and more and will be updated accordingly as the business begins and continues operations.

In addition to random drug tests, we will also train management to uphold our SOPs and written policies. This training will help managers identify key indicators of potential violations of the alcohol- and drug-free workplace policy and walk them through the steps to confront any individual they suspect of such violations. Management will also educate and inform all staff of these SOPs and educate them on the health and safety risks associated with being intoxicated while working and within the workspace. To maintain a consistent and successful alcohol- and drug-free workspace, we will ask staff to submit feedback on the effectiveness of our current SOPs to see if any changes or updates are necessary.

The primary goal of this plan is to develop a culture of compliance with and respect for these policies. By doing so we will not only improve the working conditions for all our management and staff, but also comply with all state laws and regulations required to operate our business safely and effectively.

## **SUBSECTION 4.10.3 – PERSONNEL TRAINING**

### **Introduction**

**Introduction.** At Island Farms, Inc, our primary focus is to provide exceptional care that caters to the medical needs of our patients. We understand that achieving this goal requires strict compliance with all operations, and to that end, we will train all our employees in the responsibilities necessary to maintain compliance. This comprehensive training program will address the Health Insurance Portability and Accountability Act (“HIPAA”), patient education, compliance with all applicable laws and regulations, patient counseling, and data collection. 64-4.002(2)(a)(25)(b)-(d), F.C.A. Island Farms will document the completion of all employee training courses and education, and the records will be maintained in employee files and made available to the Department upon request.

**Patient Confidentiality.** Protecting patients’ privacy and securing their confidential health and personal information is a core tenet of Island Farms’ business plan. We will limit the disclosure of patient information to only those employees required to have it. Employee patient confidentiality training, delivered in-person and through electronic means, and documented, will cover such topics as HIPAA, PHI, section 381.986, F.S., and other requirements of the Department, including a focus on preventing accidental breaches of information. 507.171(1)(a). In addition, Island Farms will ensure all electronic information is secured via passwords, encryption, and firewalls and that paper records are stored in locked files. Our dispensing facilities will be designed to allow for confidential sales interactions, either at spacious counter locations that allow for discreet conversations or in a private consulting room. Computer screens will be situated so they are not visible to other customers, and we will use side-angle privacy screens that limit the viewing angle

to 30° off center. If a data security breach knowingly occurs, we will notify authorities immediately.

**Patient Education.** We believe that education and training are essential not only for our management and staff but also for our patients. Our patient education program is personalized and designed to help patients understand our company's role, responsibilities, treatments and products offered, delivery methods, and healthcare applications. Additionally, we will provide informative posters and pamphlets to address common inquiries, dispel misconceptions, and debunk myths associated with marijuana. Employees will also be trained to explain label information for each product and will know how to print and affix patient-specific label information on the receptacle of a patient's product before dispensation. §381.986(8)(e)11.f., F.S.; 64-ER20-32.

To ensure clarity and consistency, we will adhere to the State of Florida's definition of marijuana, as outlined in 381.986(1)(f), F.S. Patients will be educated on key terminologies, including those related to edible marijuana products, as defined in 381.986(1)(d), F.S. Our educational materials will address: (1) how to manage the dosage of medical marijuana to achieve the desired therapeutic effect; (2) selecting and using appropriate delivery methods, such as vaporizers or edibles; (3) methods on the safe storage of marijuana to prevent accidental ingestion by children and pets; (4) rules and regulations on driving under the influence of cannabis; and (5) information on the legal requirements for using medical marijuana in the state of Florida, including quantity limitations. Moreover, we will train our associates to educate patients (in writing and verbally) on all the state's qualifying medical conditions, how to use marijuana in a safe, effective, and legal manner, the variety of available strains and their uses, the potential negative health consequences of marijuana use, including advice on how to avoid unpleasant or adverse reactions and how to report such

adverse reactions. Most importantly, the employees providing consultation will be trained in how to avoid providing medical advice which could constitute the unlicensed practice of medicine.

**Collection of Patient Information.** Patient information, particularly that of a confidential nature, will be collected in secure areas to avoid inadvertent disclosures. This information will only be collected by employees who have been properly trained and whose job requirements mandate the collection of patient information. Personal information will only be collected with patient consent and as required by law. Once we have collected patient information, we will keep records in a locked, secure location inaccessible to patients, and from employees whose work does not require access to PHI. PHI will not be left out where other patients or employees could see it. File cabinets will be used to store physical records and they will be locked, and access to them limited according to employee job requirement. Employees will be trained in information security and to double-check that materials and documents are secured when not in use. These employees will understand and be able to provide each patient with our Notice of Privacy Practices and will be able to inform each patient on the ways we use and disclose the patient's PHI. All electronic records will be password protected, and we will deploy privacy measures such as polarized privacy screens on computers. As a medical industry best practice, employees will adhere to state-provided guidelines for patient records retention. 456.057, F.S. We will maintain detailed and thorough logs of patient healthcare information such as treatment, prescriptions, and other PHI for as long as the State of Florida requires.

**Regulatory Compliance.** We are committed to exceeding all employee training expectations regarding compliance with section 381.986, F.S., and other Department rules. Our training programs will closely follow and adhere to all regulatory guidelines or emergency rules promulgated by the State of Florida, specifically in relation to medical marijuana. We will adjust

our training programs accordingly to include these rules, with a specific focus on regulatory compliance training (as outlined in 943.17261, F.S.). This training will ensure that employees understand the requirements in detail, including adhering to correct definitions, properly identifying qualified patients, and understanding the compliance implications in day-to-day operations. Employees will be instructed regarding the Department's administrative enforcement actions which impose reasonable fines up to \$10,000 for improperly disclosing personal and confidential information of the qualified patient under 381.986(10)(f)(4), F.S. Our Chief Compliance Officer will provide regulatory compliance training and update the training SOPs as new rules and applicable laws become available.

**Additional Training.** To promote personnel knowledge and proficiency in all areas of application guidelines, regulations, and rules, we will train on all the above areas of knowledge and include additional training as follows.

Business Associates: Business associates are individuals or institutions who do not provide health care services, but who have a legitimate need for access to a limited amount of PHI. Employees will be trained in identifying and understanding the role of business associates and their importance in preserving confidential patient information

Solvent Training: We will create and maintain written detailed standard operating procedures for the safety and operation of all Solvent-Based Extraction equipment, including our Closed Loop System, within the manufacturer's equipment safety specifications. 64ER21-13(11). We will train our employees in these standard operating procedures using our employee training plans. 64ER21-13(3)(d).\_

**Complaints:** Island Farms will also have a mechanism for patients to register complaints about information privacy, and employees will educate patients on how to have those complaints

addressed. Our Chief Compliance Officer will handle the collection and recording of complaints and work with the Chief Operating Officer to oversee the process of investigating the complaint and determining if the complaint can be substantiated. This process will allow for the grievance to be heard, addressed, and rectified.

**Consent:** All employees will receive training on consent and obtaining consent from patients before proceeding with any medical conversations. We will train them to ask each patient entering treatment to give express and informed consent for admission or treatment. 394.459(3)(a)(1), F.S. Consent must be granted by the patient before recording their information or obtaining an image of them. All employees will be trained in patient consent and will be expected to know all our SOPs (standard operating procedures) related to consent. Patients will be notified of any limitations to confidentiality on transmissions they send or receive from our facilities. We will obtain the written consent form for each of our patient clients, ensuring that the qualified physician who has issued it has used a standardized informed consent form adopted by the Board of Medicine and the Board of Osteopathic Medicine. 381.986 (8)(a-h), F.S.

**Emergencies:** We will have response procedures in place for emergency situations, such as natural disasters, severe weather, medical emergencies, and attempted robberies. Our management will address emergency protocols in personnel training. Employees will also be thoroughly trained in emergency scenarios involving diabetic emergencies. 943.1726, F.S.\_

**Marijuana:** Employees will be trained in all the history, proper terminology, and medicinal benefits of marijuana once they are hired, particularly if employees have little or no knowledge or experience with marijuana. Employees must have a thorough understanding of marijuana plants and their components, along with the products produced with it, to adequately treat patients. Our training will meet and exceed those established by the State for the Department of Law

Enforcement. 943.17261, F.S. Such training will include understanding cannabidiol (CBD), tetrahydrocannabinol (THC), other cannabinoids, and terpenes, which are found in cannabis plant extract. We will follow the State of Florida's definitions on these compounds.\_

**Sanctions:** We understand that the Department will conduct announced and unannounced inspections of our facilities to determine compliance with its rules and regulations. We understand that the Department will conduct at least a biennial inspection of our facilities to evaluate our records, equipment, processes, security measures, sanitation practices, and quality assurance practices. Violations of rules and regulations identified by the Department may result in sanctions. We will train all our personnel to be aware of protocols for inspections, and the potential consequences if our facilities are not in compliance.

#### **SUBSECTION 4.11.1 – DIVERSITY PLAN**

We understand the remarkable value of having diversity in ownership, management, employees, and contractors. We will develop our business to expand involvement of minority persons who are lawful residents of Florida, including African Americans, Hispanic Americans, Asian Americans, Native Americans, and American women, and minority business enterprises and veteran business enterprises, domiciled in Florida. 288.703(1)(3)(4), F.S; 295.187, F.S.

Our team is an inclusive, diverse group of individuals united in our goal of expanding diversity in Florida's cannabis industry, as reflected in this actionable, timely, measurable Diversity Plan. This plan details; how we will promote the representation of minority persons and veterans in our MMTC's workforce; our efforts to undertake recruiting of minority persons and veterans for employment; our plan to contract for services with minority business enterprises and veteran business enterprises, and; our specific goals, programs, and metrics that we will use once licensed as an MMTC such that, at the time of renewal, we will be able to demonstrate the effectiveness of our Plan. 381.986(8)(b)(10), F.S.

We are keenly aware that serious efforts toward diversity and inclusiveness must be supported by real, actionable steps; specific goals must be identified and progress toward goals must be measured consistently. To that end, we have prepared a plan that ensures the involvement of diverse participants in ownership, management, employment, and contracting opportunities. We have selected our Director of Human Resources ("DHR") to spearhead efforts to hire, retain, and promote a diverse group of talented employees. The DHR will create programs and trainings, and articulate our company's values on diversity and inclusion. Our recruiting and hiring practices incorporate multiple steps to ensure a fair, consistent process. We will recruit minority persons

and veterans for employment through this process equitably and fairly, based on individuals' employment history and experience. License Application Instructions, Subsection 4.11.1.

#### Specific Goals and Timeline

We established S.M.A.R.T. (Specific, Measurable, Achievable, Relevant, and Time-bound) diversity goals, and we will continuously maximize the representation of minority persons and veterans in our workforce. 381.986(8)(b)(10)(a). We will also encourage increased diversity in the ownership, management, employees, and contractors of the Florida cannabis industry by implementing a Career Accelerator Program, creating mentorship opportunities, and hosting networking events.

We plan for 20% of our staff to be minority persons and veterans in year 1 and 30% by the end of year 2. We share the State of Florida's commitment to diversity and will implement training programs and other educational programs to enable minority and veteran persons and business enterprises to succeed. 381.986(8)(b)10., F.S. Accordingly, if results of these metrics are not in line with expectations, we will: identify the specific program in place related to the metric; determine the cause of the shortfall; solicit input on rectifying the shortfall from within the company and externally; and document changes to the Plan.

Prior to operations, company leadership will host at least one event and attend at least three events to find diverse partners and employees. We will establish a Diversity Working Group comprised of owners, executives, managers, and employees that meets at least quarterly to measure progress toward goals and recommend corrective actions.

Within the first six months of operations, managers will undergo training seminars to equip our leadership team with the tools necessary to manage a diverse workforce. On a quarterly basis, we will provide managers with a paid opportunity to take continuing education courses related to

diversity. All employees will undergo an internal diversity training hosted by a member of our team who has attained certification in such training efforts.

### **Minority and Veteran Contractors**

Florida leads the nation in minority owned businesses, according to the U.S. Small Business Association. We believe this large workforce will be able to meet a significant portion of our contracting needs. We've had discussions with veteran owned businesses such as Lane Technology Solutions for IT and Cybersecurity services, that are contingent upon license approval. We will strategically contract for services with minority business enterprises and veteran business enterprises through a well-defined selection criteria process that provides significant weight to diverse and veteran businesses. We will perform outreach to potential contractors through communication with veterans' groups, minority groups, women-owned, and small business groups to help us find qualified partners.

### **Hiring and Outreach**

We will recruit minority people and veterans for employment. Employment efforts may include minority person- and veteran-focused job fairs, electronic and print media, targeted online searches, executive recruitment, hosting and attending events, giving educational presentations, and leveraging connections with local nonprofit organizations that assist with minority and veteran hiring.

### **Minorities Persons**

We will institutionalize our commitment to equality in every aspect of the employment process. Upon licensure, we will immediately publish employment opportunities in demographically focused media, printed in multiple languages, such as local ethnic newspapers, hobbyist

magazines, penny saver booklets, and other outlets that can help increase participation among diverse groups.

### Veterans

We will implement a veteran talent recruiting program, building on close personal ties to the local community. We will partner with local veterans' organizations to advertise employment opportunities through job postings, hosting veteran events, and giving presentations. To educate veterans while simultaneously alerting them to employment opportunities, we will build relationships with and give targeted presentations to various state and national veterans organizations. Further, we will both attend and host events specific to veterans and share employment postings with the local Veteran Affairs Office to display in their offices.

### **Diversity Training**

We will create a level of cultural competency that begins with self-aware and well-trained owners, executives, management, and staff. We have zero tolerance for discrimination of any type, and understand that harassment on the basis of a protected class is a civil rights violation under Florida law. Title XLIV S.760.01(2). We will require owners, managers, and staff to understand the company's diversity and inclusion policies through diversity awareness trainings, thereby fostering creativity, workplace innovations, and promoting colleague engagement by making all staff feel welcome. Nondiscrimination policies will apply to all staff, officers, and visitors. We will have zero tolerance for retaliation or harassment against any employee involved in the filing, investigation, or resolution of a discrimination complaint. Further, we will ensure reasonable accommodations for veterans, women, minorities, and those with physical and intellectual disabilities. Diversity trainings, like diverse hiring practices, will be tied to specific qualitative and quantitative metrics.

#### **SUBSECTION 4.11.2 – IMPLEMENTATION OF DIVERSITY PLAN**

Island Farms, Inc will use our business to expand involvement of minority persons who are lawful residents of Florida, including African Americans, Hispanic Americans, Asian Americans, Native Americans, and American women, and minority business enterprises and veteran business enterprises, domiciled in Florida. 288.703(1)(3)(4), F.S; 295.187, F.S; 381.986(8)(b), F.S.

We will establish S.M.A.R.T. (Specific, Measurable, Achievable, Relevant, and Time-bound) diversity goals. In this implementation plan, we will examine how to turn these goals into a reality and offer strategic insight into the rationale behind our decision to implement, maintain, and improve upon our Plan.

#### **Objectives and Assessment**

Our primary objective with this plan is to enshrine the work of diversity and inclusion in our workplace culture. Serious efforts toward diversity and inclusiveness must be supported by real, actionable steps. Accordingly, we have prepared the implementation of our Plan to ensure the involvement of diverse participants in ownership, management, employment, and contracting opportunities. This implementation plan will include objectives, timetables, and evaluation metrics.

We have selected our Director of Human Resources (“DHR”) to oversee the implementation of our Plan. Their role will focus on maintaining the effectiveness of the plan, communicating regularly with employees about diversity and inclusion, and calling for any adjustments. Our DHR understands the importance of carrying an organization's vision and culture through the heart of all programs, relying on knowledge of employee relations, performance management, and communication best practices to drive results. Our DHR will work with ownership and

management to ensure we follow appropriate legislation and employment regulations related to bias and inclusion.

We will never engage in practices that discriminate on the basis of race, color, religion, national origin, ancestry, age, sex, marital status, order of protection status, disability, military status, sexual orientation, pregnancy, or unfavorable discharge from military service.

#### S.M.A.R.T. Goals

We established S.M.A.R.T. goals within our Plan and will use them to guide implementation. We will have diversity and inclusion in mind when hiring employees and contractors to guarantee a sizable portion of our personnel is diverse. Our MMTC will prioritize educating employees on the importance of diversity and inclusion by offering resources online and in-person.

Immediately upon operations, 30% of employees will be women; 20% will be members of qualifying minority groups; 10% will be veterans; and, 5% will be persons with a disability. After one year of operations, 30% of managers will be members of qualifying minority groups, 40% will be women, and at least one will be a veteran or person with a disability. Upon employment, all employees will undergo internal diversity training delivered by a member of our team who has attained certification in such training efforts. We will organize events, meetings, round-table discussions, and partnerships with a diverse coalition of nonprofits and organizations to find prospective applicants and ways to improve our center's own diversity practices.

#### Assessment

Throughout the process of implementing our Plan, we will regularly communicate with all staff, contractors, and other key business personnel on suggestions, modifications, and improvements to the plan. Implementation is not done in a single day, nor is diversity knowledge achievable after a day's worth of training, so there will be a process in place to assess the success of the plan and its

overall continuous implementation. This will be achieved through quarterly reviews with staff and management along with a comprehensive annual review. At the time of license renewal, our owners will commission an agent, employee, contractor, and subcontractor diversity report for presentation to the Department. This report will evaluate the status of our Plan, whether our S.M.A.R.T. goals were met for the current period, how we worked to achieve our goals, and how we will continue to ensure that diverse participants and groups are afforded equal opportunity.

### **Diversity and Culture**

We will develop a culture of diversity and inclusion. This means featuring diversity and its core elements within our mission statement, vision statement, marketing and branding materials, and overall public image.

#### Hiring, nonprofits, and other organizations

We will solicit employment opportunities through a resource pool which includes but is not limited to the following: Executive Leadership Council, Hispanic Association of Colleges and Universities, LGBT CareerLink, National Black MBA Association, National Society of Hispanic MBAs, and the Military Officers Association of America.

#### Training

Qualified staff will conduct trainings and encourage discussions about diversity and sensitivity, increasing the feeling of teamwork and decreasing the potential for discrimination and harassment.

We have zero tolerance for such discrimination and understand that harassment on the basis of a protected class is a civil rights violation under Florida law. Title XLIV S.760.01(2).

We share the State of Florida's commitment to diversity and will implement training programs and other educational programs to enable minority and veteran persons and business enterprises to succeed. 381.986(8)(b)10., F.S. Accordingly, if our progress is not in line with expectations, we

will: identify the specific program in place related to the metric being measured; determine the cause of the shortfall; solicit input on rectifying the shortfall from within the company and externally; and document changes to the Plan.

### **Steps Already Taken**

Throughout this implementation plan, we have outlined actions which will be taken during and/or after the licensure phase. We have already taken several steps to implement our Plan pre-licensure which will enable us to execute these goals fully. 2023 MMTC Application, Subsection 4.11.2.

Some of the steps that have already been taken include; creating a Plan in line with the State of Florida's expectations and requirements for licensure; connecting with local nonprofits and diverse businesses to establish productive working relationships; and searching for prospective applicants for a variety of management and staff positions with diverse backgrounds and experiences.

### **Conclusion**

We founded Island Farms with a clear and unwavering commitment to Social Responsibility as a core tenant of our operations. We will implement the strategies identified in our Plan in service of this mission and uphold our S.M.A.R.T goals identified herein to accomplish this.

#### **SUBSECTION 4.12.1 – CERTIFIED FINANCIAL STATEMENTS**

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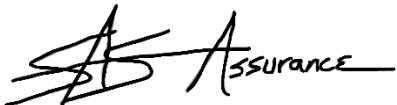




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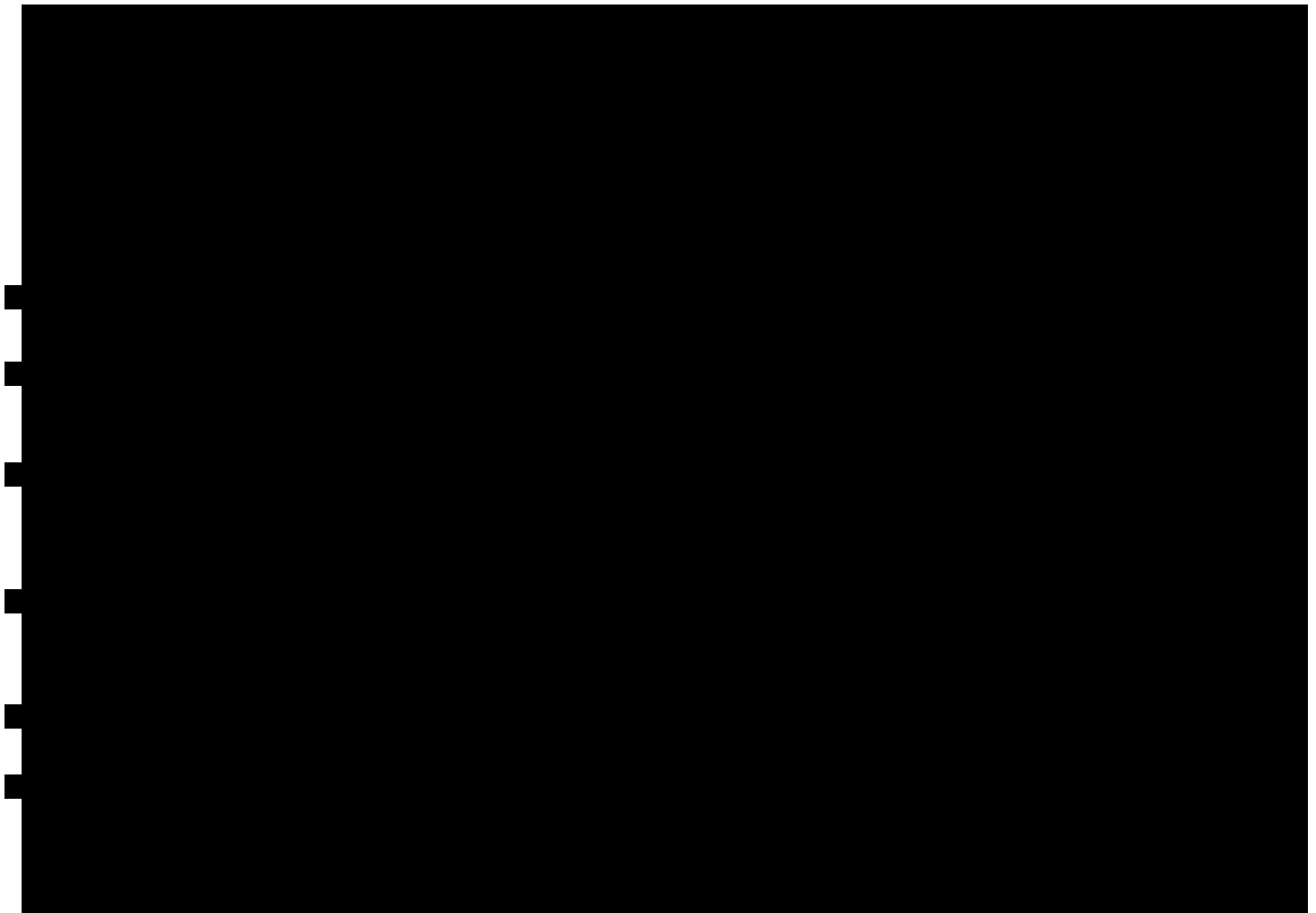
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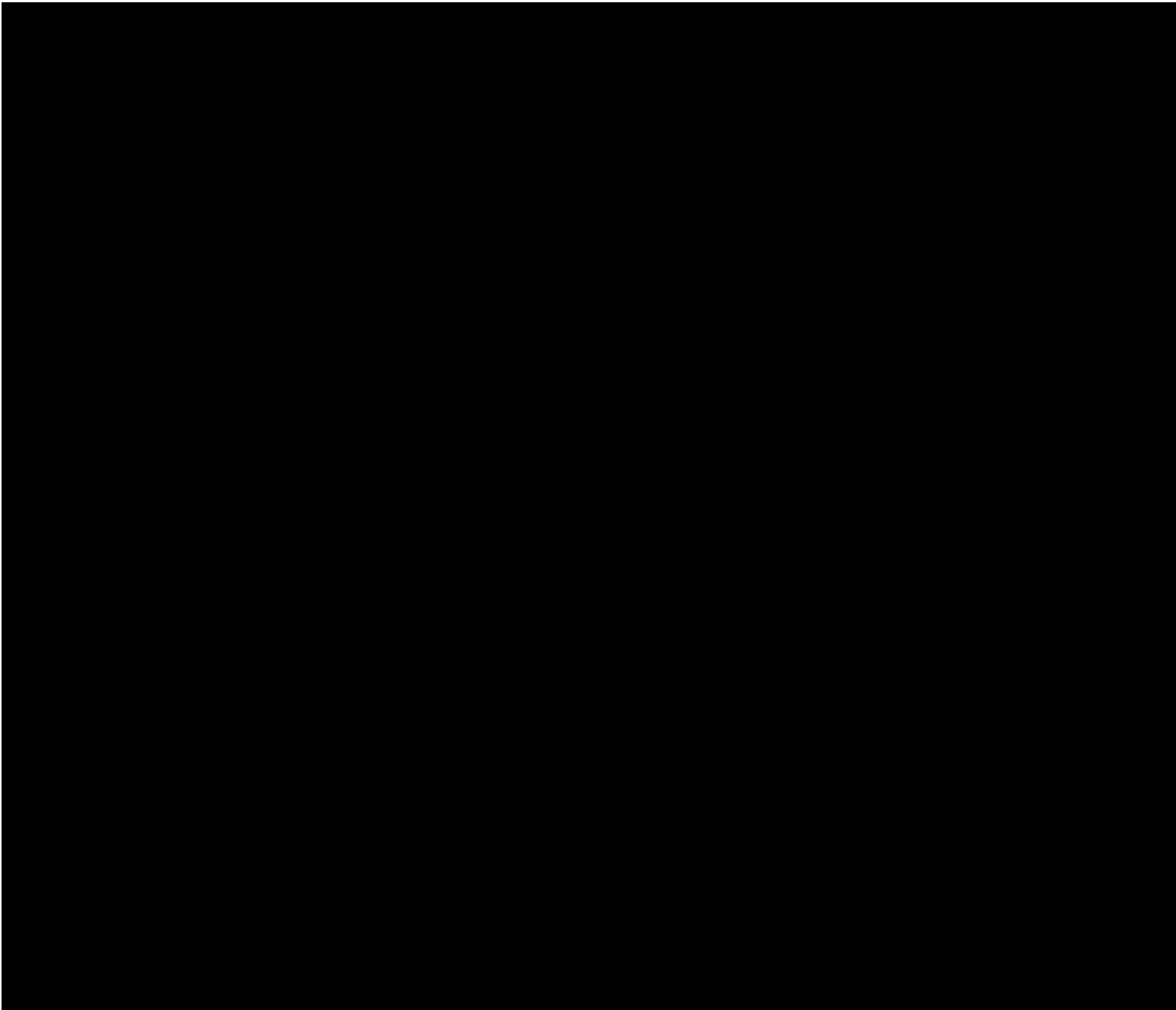
Apopka, Florida

April 21, 2023

The accompanying notes are an integral part of the financial statements.



The accompanying notes are an integral part of the financial statements.



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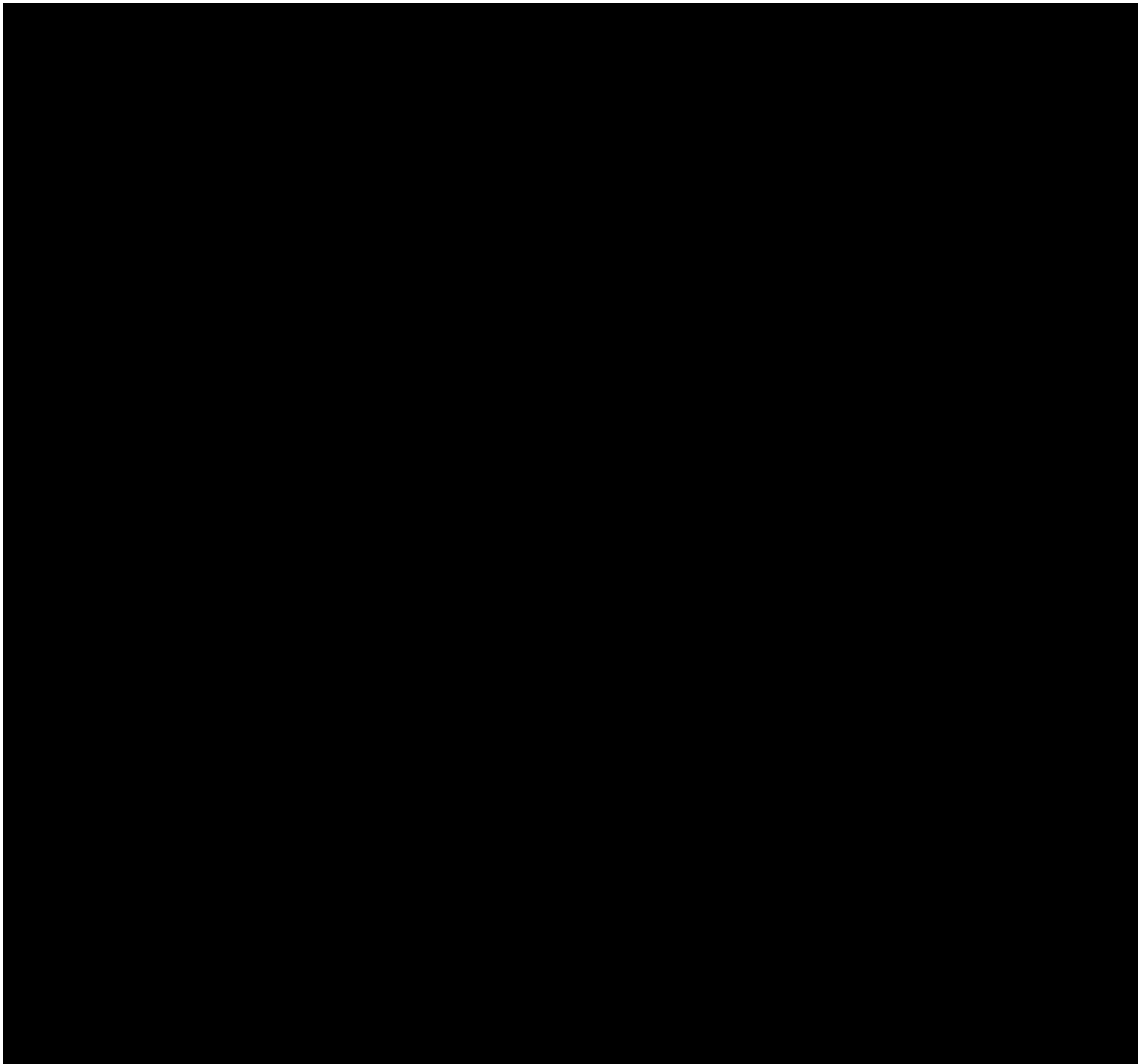
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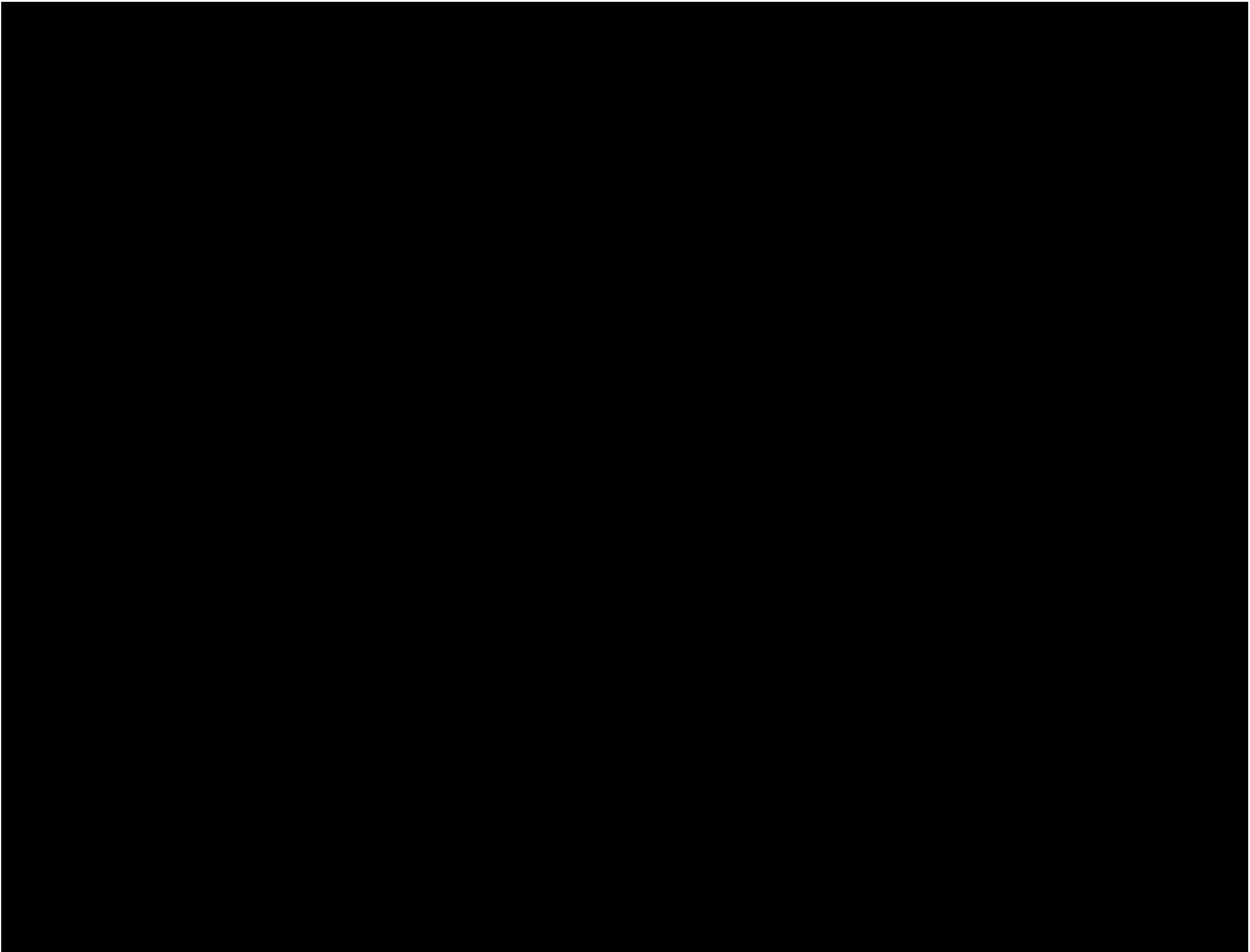
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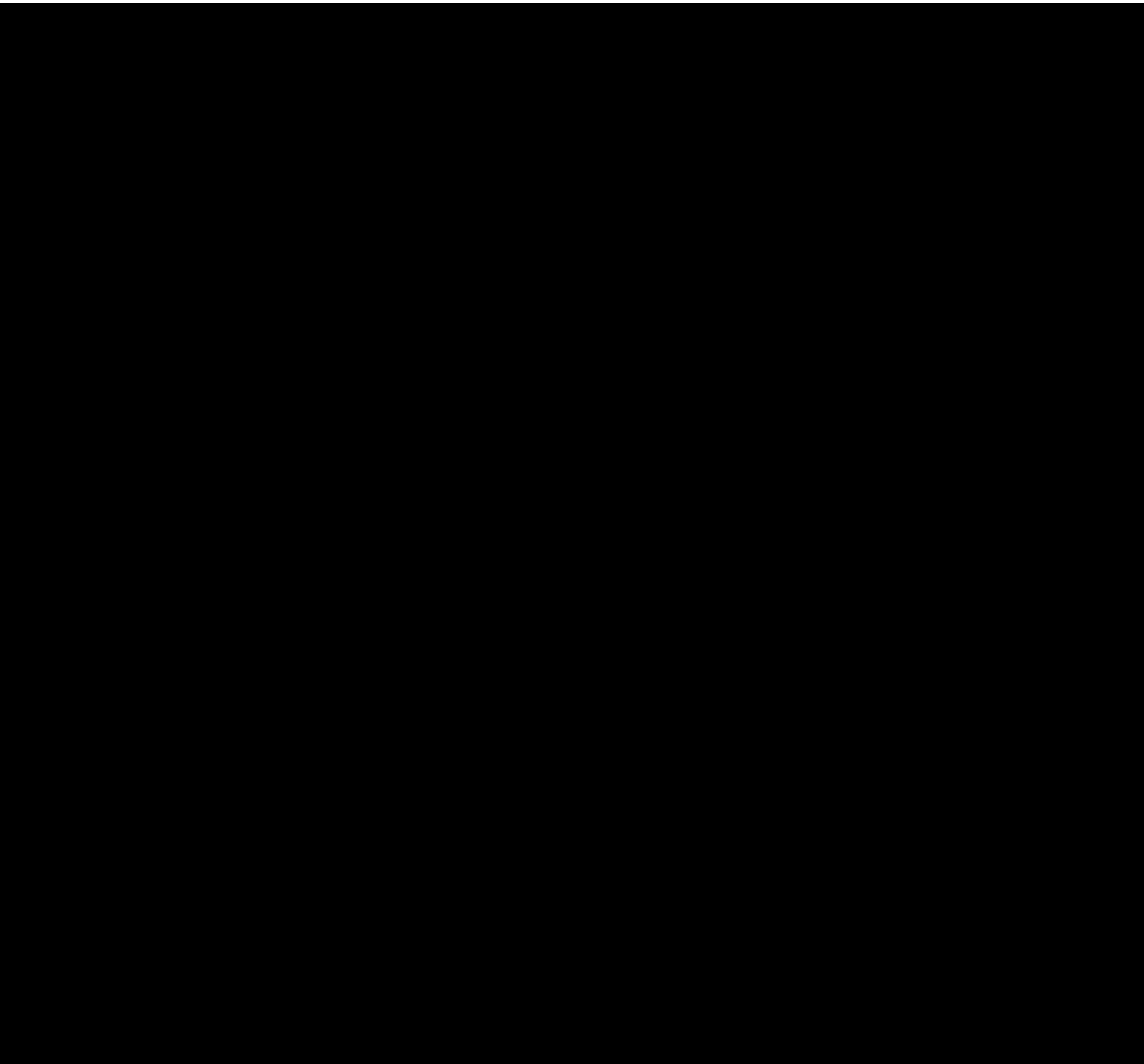
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## **SUBSECTION 4.12.2 - ADDENDUM**







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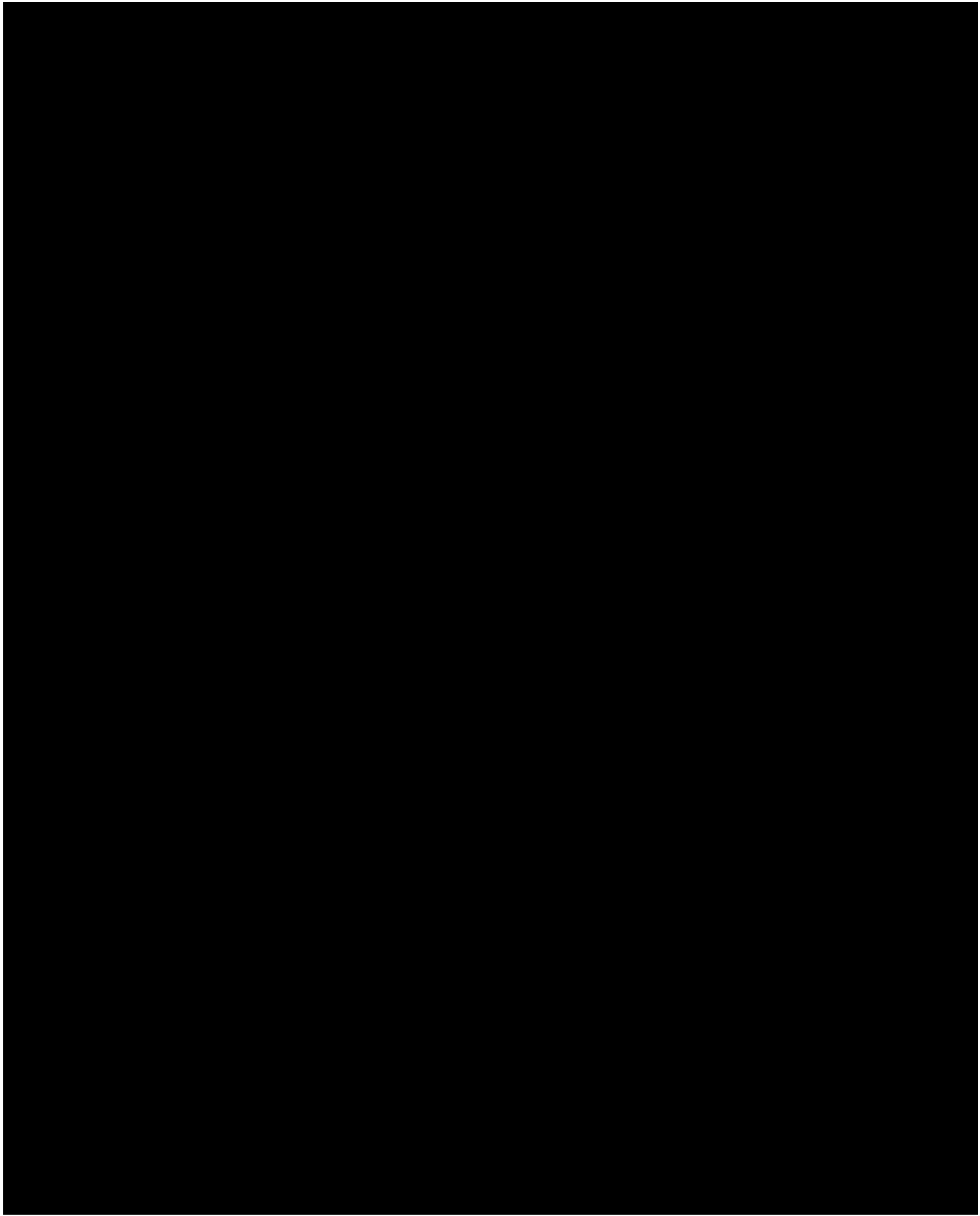
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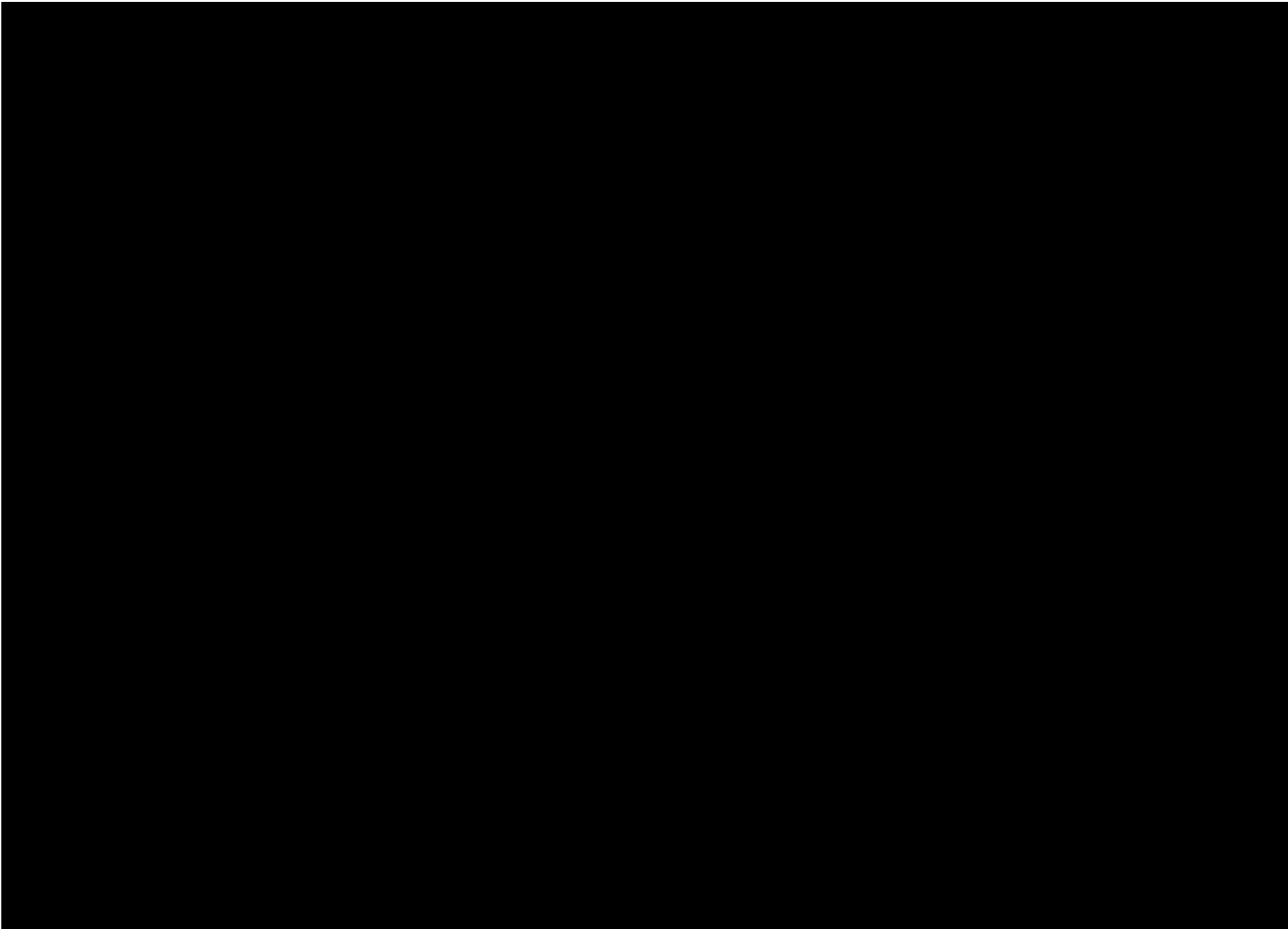
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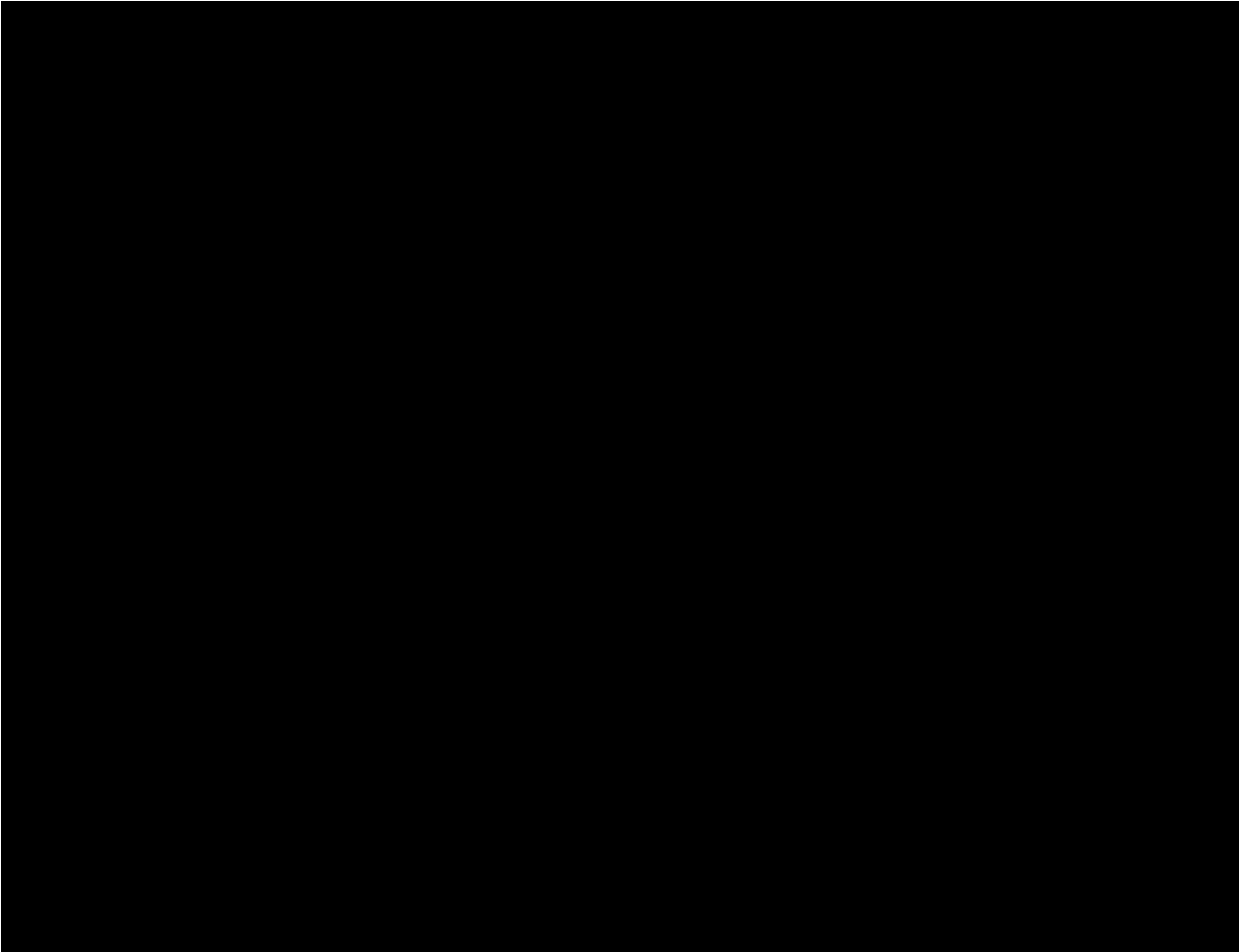
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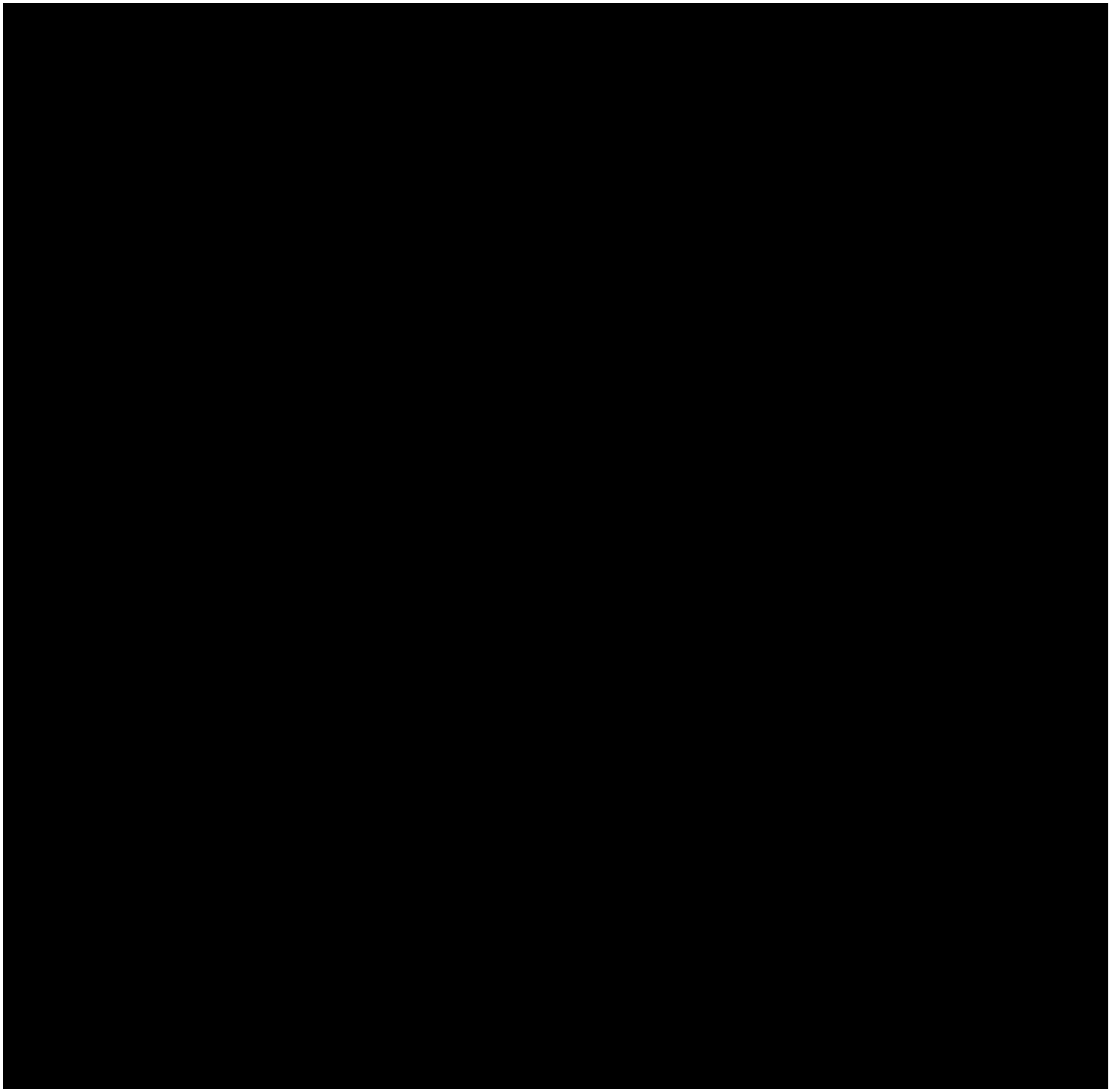
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6. **No Registration.** Upon execution of this Agreement, the Shareholders represent and

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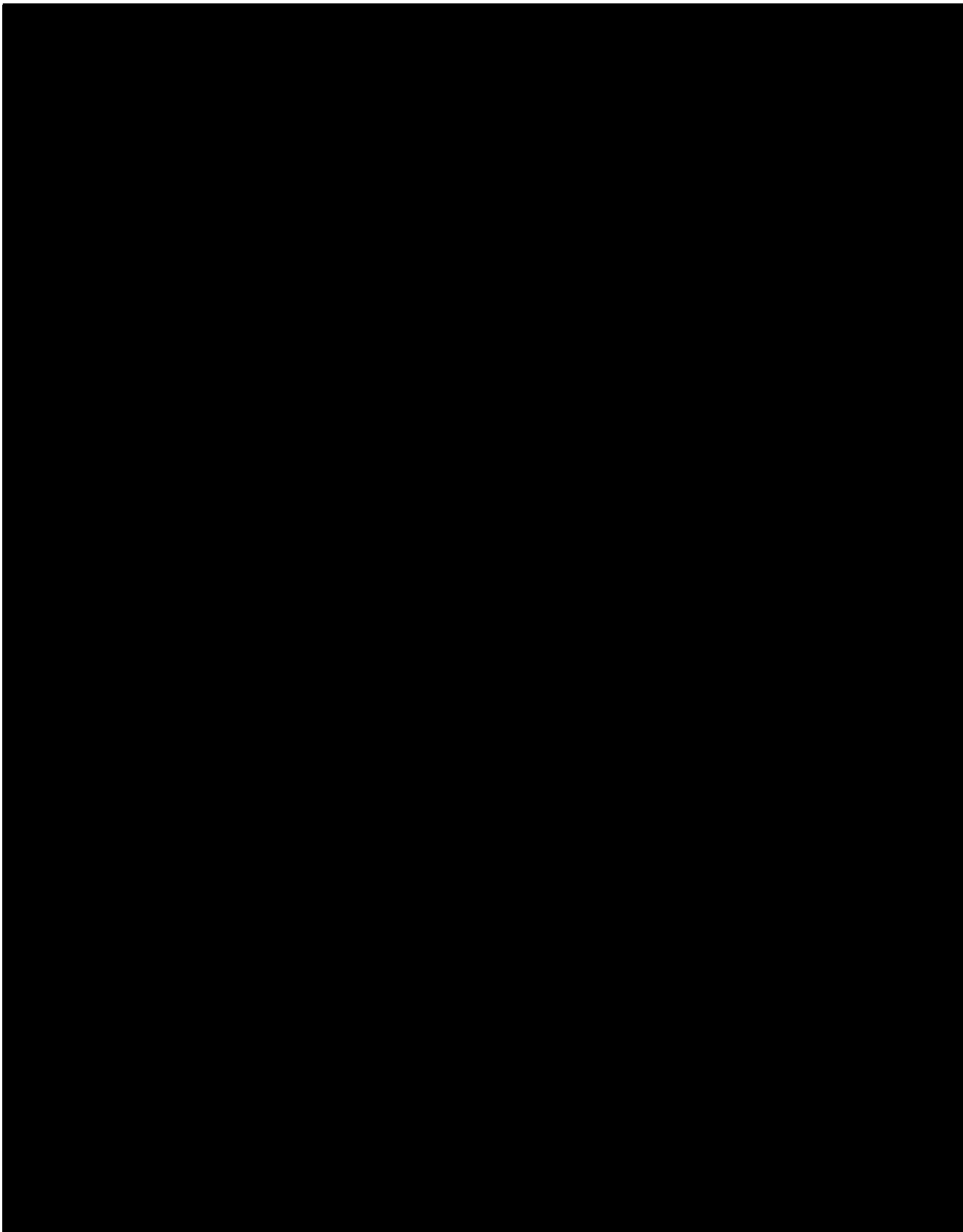
[REDACTED]

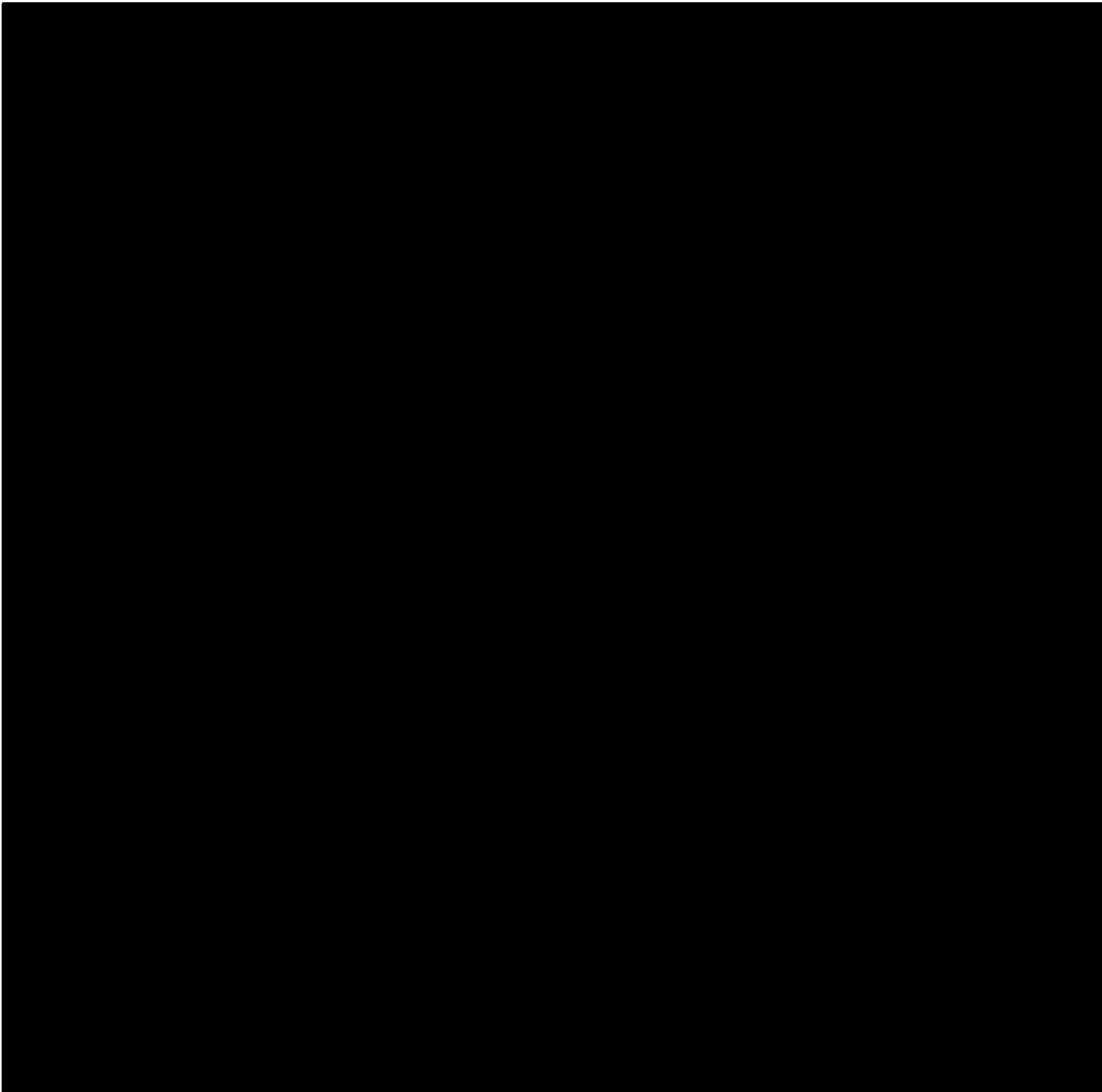
[REDACTED]

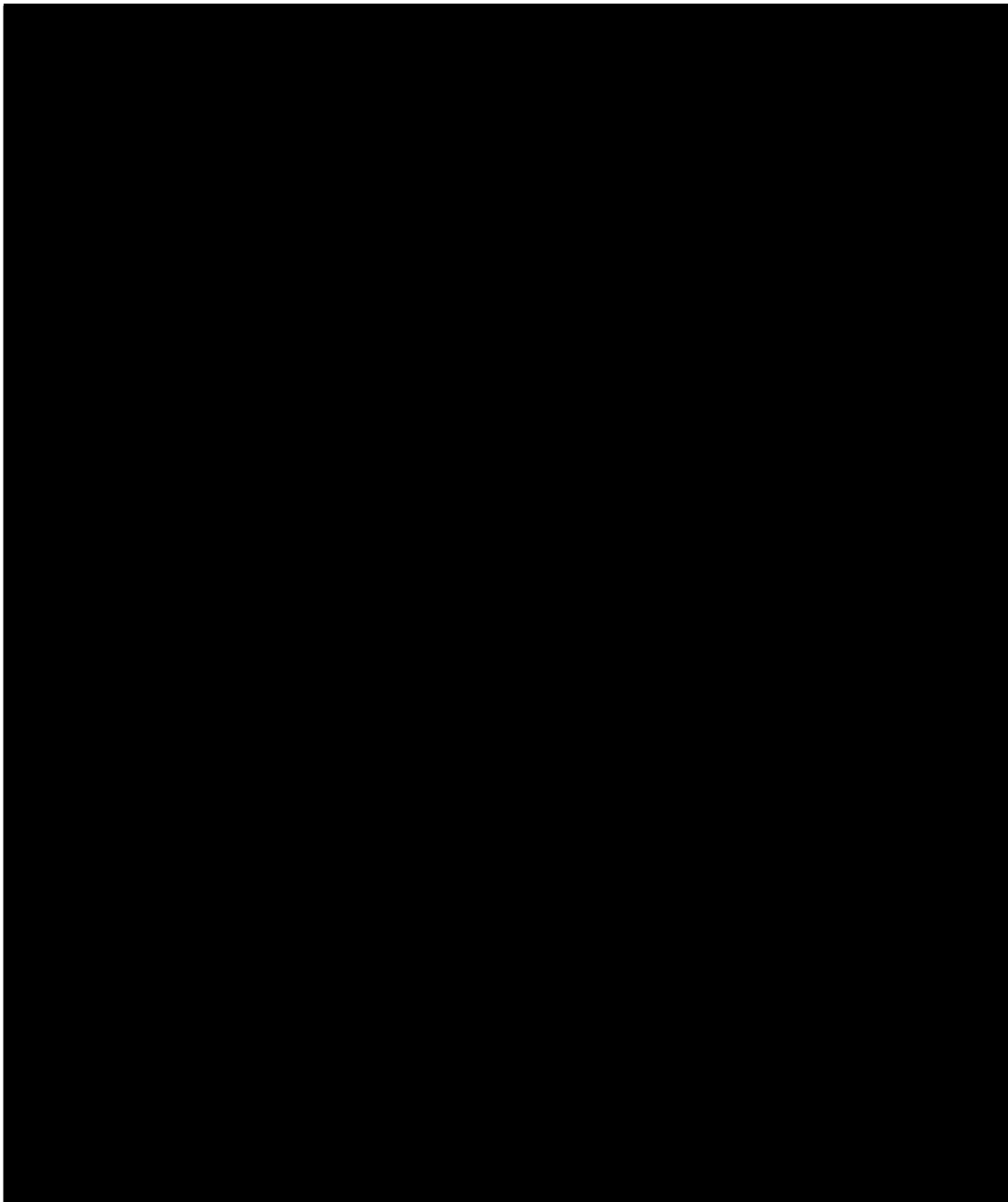
[REDACTED]

[REDACTED]

[REDACTED]







Signature Page to Contribution Agreement

**SUBSECTION 4.13.3 – CAPITALIZATION TABLES, CHANGE OF CONTROL, AND  
RELATED ENTITIES**

**ISLAND FARMS, INC - SCHEDULE OF MEMBERS - CAPITALIZATION TABLE**

**a.**

[REDACTED]

[REDACTED]

**c. N/A**

**d. PARENT COMPANY:** Enlightened Strain Holdings, LLC

**OWNERSHIP PERCENTAGE OF ISLAND FARMS, INC:** 100%

**APPOINTED MANAGER(S):** Ryan Scotson

[REDACTED]

[REDACTED]

**APPLICANT:** Island Farms, Inc

**APPOINTED MANAGER(S):** Ryan Scotson

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## **SECTION 4.14 – APPLICANT ACKNOWLEDGEMENT**

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

I, Terry Snow, 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): Terry Snow

Representative Signature: *TERRY SNOW*  
TERRY SNOW (Apr 24, 2023 10:25 EDT)

MMTC Applicant Name: Island Farms, Inc