

FORM 1: APPLICANT GENERAL INFORMATION

Applicant Information				
Applicant Name				
PREMIER BIOSCIENCE, LLC				
Mailing Address				
730 NE 19TH PLACE				
City	Apt/Ste #	State	ZIP Code	Country
CAPE CORAL		FL	33903	USA

Contact Information		
First Name	Last Name	Middle Initial
EDGAR	ASEBEY	J.
Telephone Number	Designated Email (for Department/Applicant Communications)	
305.903.9945	EDGAR@KELLERASEBEY.COM	

Medical Director Information		
First Name	Last Name	Middle Initial
JOSEPH	ROSADO	
Florida Physician (MD or DO) License Number	Telephone Number	Email
ACN 336	407.575.8525	JRMDDC@GMAIL.COM

4.2 Declaration of Exempt Information

Applicant does not declare any application-related documents as trade secret or otherwise exempt from public inspection or disclosure.

State of Florida



Department of State

I certify from the records of this office that M.T. LOTZ, LLC which changed its name to PREMIER BIOSCIENCE, LLC, is a limited liability company organized under the laws of the State of Florida, filed on June 1, 2011, effective June 1, 2011.

The document number of this company is L11000064193.

I further certify that said company has paid all fees due this office through December 31, 2023, that its most recent annual report was filed on April 14, 2023, and its status is active.

I further certify that said limited liability company 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
Twentieth day of April, 2023



A handwritten signature in black ink, appearing to read "C. Byrd".

Cord Byrd
Secretary of State

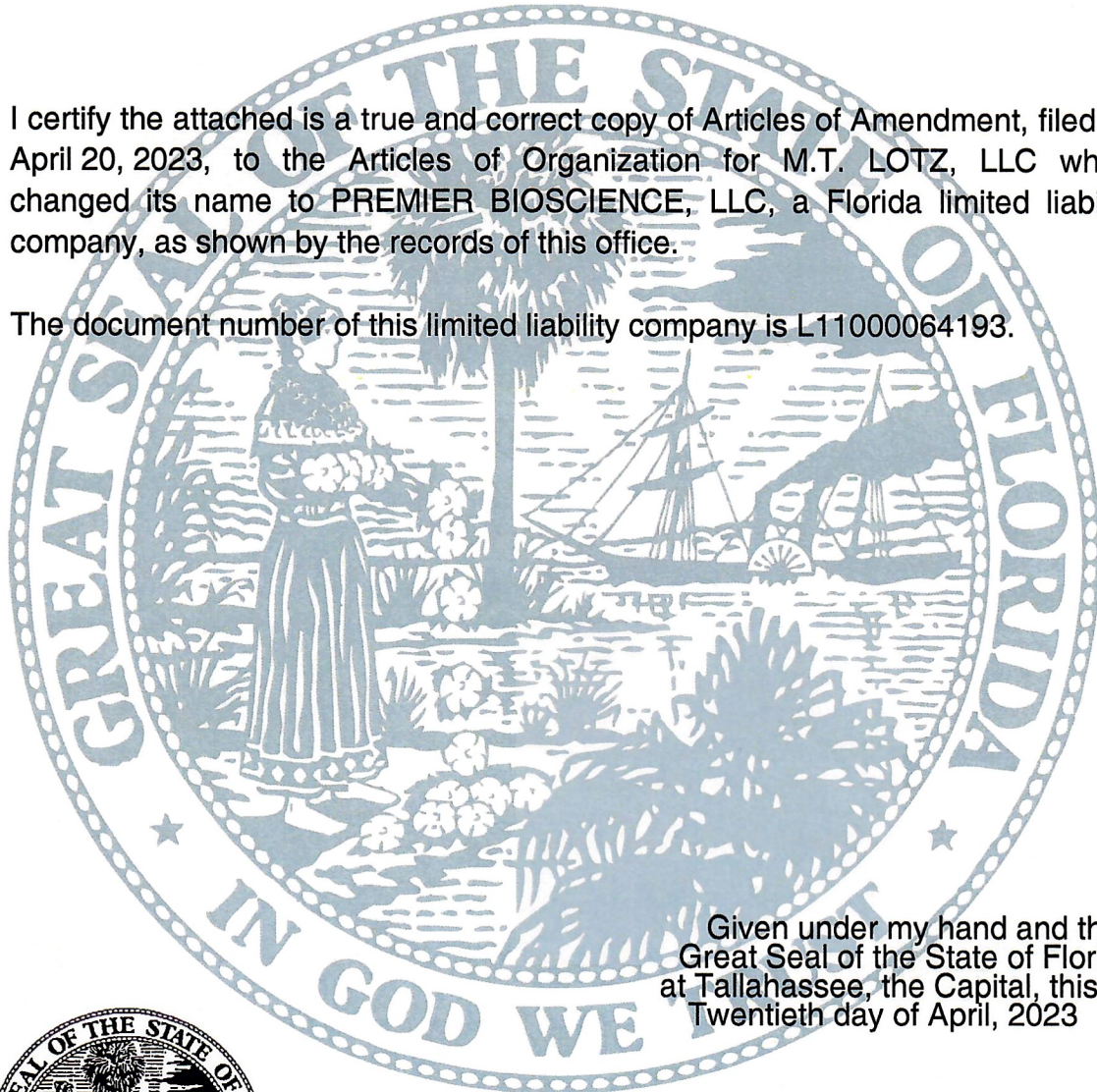
State of Florida



Department of State

I certify the attached is a true and correct copy of Articles of Amendment, filed on April 20, 2023, to the Articles of Organization for M.T. LOTZ, LLC which changed its name to PREMIER BIOSCIENCE, LLC, a Florida limited liability company, as shown by the records of this office.

The document number of this limited liability company is L11000064193.



Given under my hand and the
Great Seal of the State of Florida
at Tallahassee, the Capital, this the
Twentieth day of April, 2023




Cord Byrd

Secretary of State



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:

PREMIER BIOSCIENCE, LLC
730 NE 19TH PLACE
CAPE CORAL, FL 33909-5176

THIS CERTIFICATE EXPIRES: 04/28/2024

FEE PAID: \$35.00

REGISTRATION NO.: 48031033

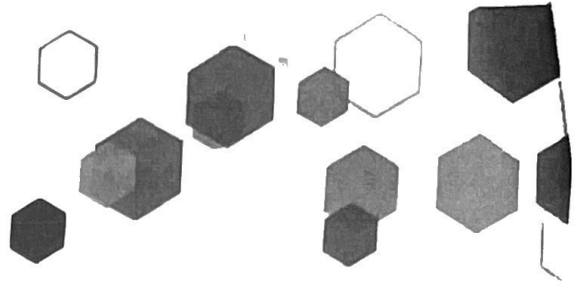
DATE ISSUED: 04/26/2023

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.

4.3.3: Level 2 Background Check Screening

Position	Name	Position (Owner/Manager)	Email	Physical Mailing Address	LiveScan TCN Number
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED] 435.09	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]		[REDACTED]



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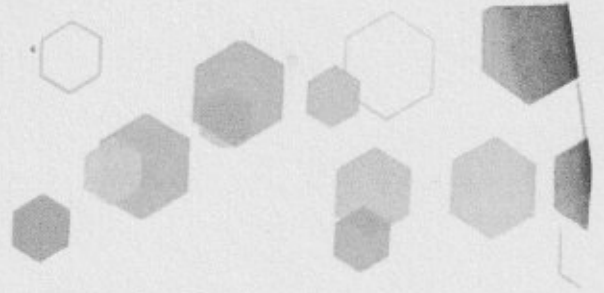
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Premier BioScience, LLC
MMTC Applicant Name



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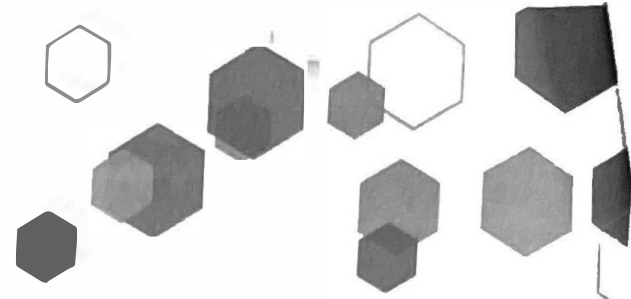
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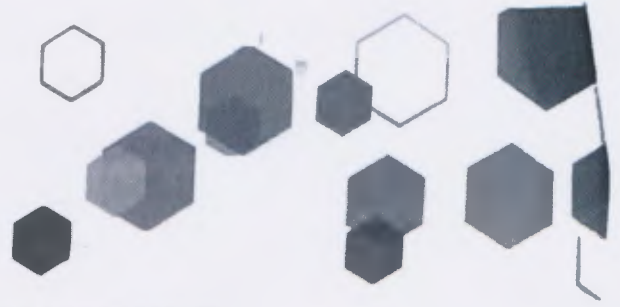
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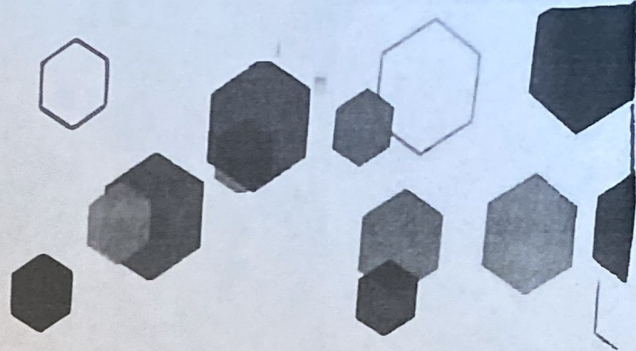
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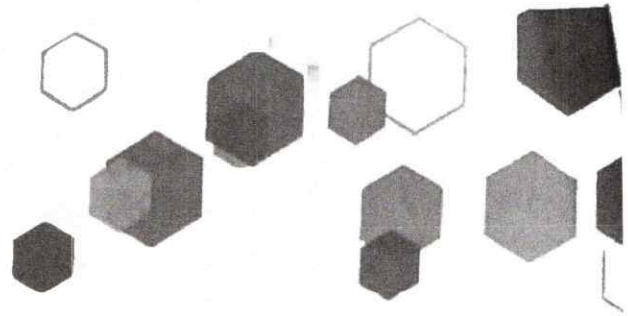
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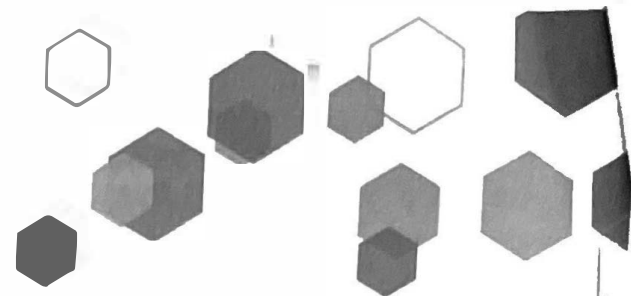
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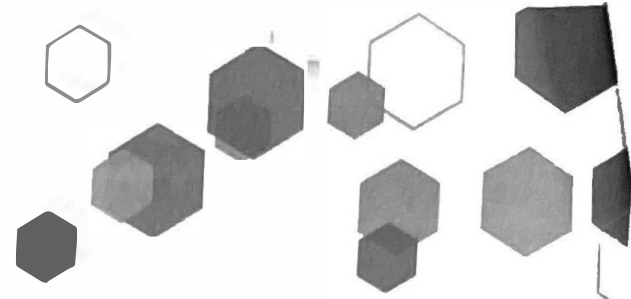
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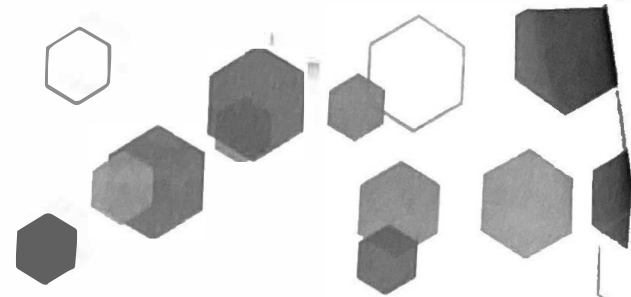
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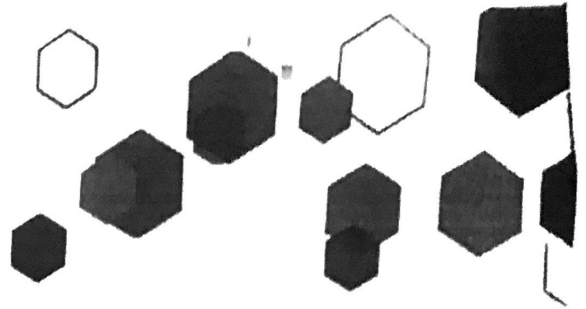
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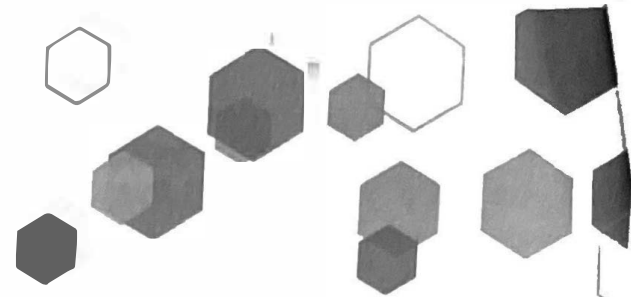
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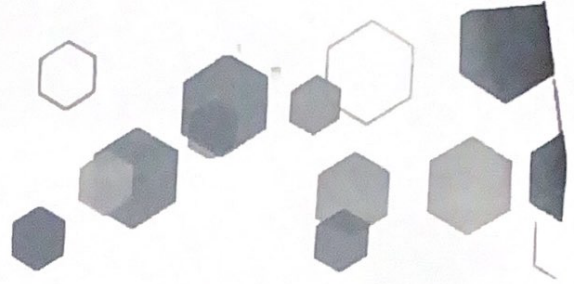
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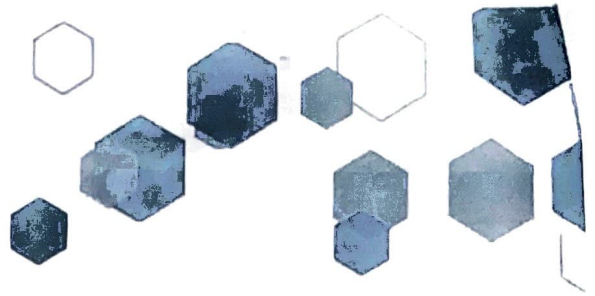
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Emergency Rule 64ER22-9
Effective: 12/2022
DH8052-OMMU-12/12/2022



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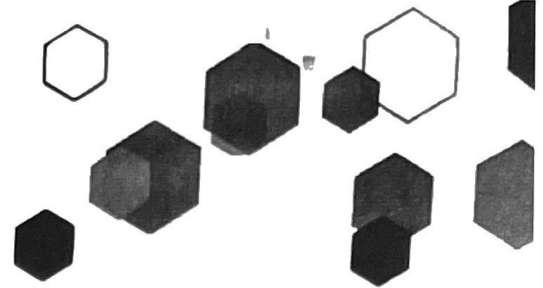
I understand that the OMMU may disclose to the applicant for Medical Marijuana Treatment Center (MMTC) licensure listed below whether I am authorized to serve as an owner or manager for the MMTC upon licensure, as provided in section 381.986, F.S., Florida Administrative Code Chapter 64-4, and applicable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

435.09

Email

Premier BioScience, LLC

MMTC Applicant Name



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

I hereby authorize the Livescan Service Provider of my choosing to submit a set of my fingerprints to the Florida Department of Law Enforcement (FDLE) for the purpose of accessing and reviewing Florida and national criminal history records that may pertain to me. I understand that my background report will be sent to the Florida Department of Health, Office of Medical Marijuana Use (OMMU), and that I would be able to receive any national criminal history record that may pertain to me directly from the Federal Bureau of Investigation (FBI) pursuant to Title 28, Code of Federal Regulations (CFR), sections 16.30-16.34, and that I could then freely disclose any such information to whomever I choose.

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

435.09

Email

Premier BioScience, LLC

MMTC Applicant Name

SUBSECTION 4.4.1 – CULTIVATION PLAN

We have constructed a comprehensive plan for cultivating marijuana and will do so in compliance with all applicable laws, and specifically section 381.986(6) of the Florida Statutes. Our team has ample experience to implement our cultivation plan in accordance with the requirements. In addition to business and medical specialists, we have a deeply experienced professional leading our cultivation efforts, and highly qualified staff to create superior products. Tyler Doster, Director of Cultivation (“DOC”) is an award-winning cultivator who has directed the cultivation efforts of a major Oregon licensed cultivation facility and the current DOC of Byrn Brands in Florida. Our Advisory Board, Executive team, Management team, and general staff also have varying types and degrees of cannabis cultivation experience as detailed in this application.

We have the technical and technological ability to cultivate and produce marijuana, including, but not limited to, low-THC cannabis. 381.986(8)(b)(3). Upon licensure from the Florida Department of Health Office of Medical Marijuana Use (“the Department”), we will compliantly implement our plans to become a fully operational Medical Marijuana Treatment Center (“MMTC”), and as part of our operations, we will cultivate marijuana for medical use. 381.986(8)(e); 381.986(8)(e)(6).

Processes, Methods, and Techniques

All phases of the cultivation of marijuana will take place in a designated area that is not visible or accessible from a public place. We will grow marijuana within an enclosed structure and in a room separate from any other plant. 381.986(8)(e)(6)(b). All spaces where we cultivate marijuana will be secured by an alarm, access control, video surveillance, and further secured by at least two employees always on our premises to protect our marijuana and related products. 381.986(8)(f). We will cultivate in individually purposed rooms for different steps of the cultivation process

including tissue cultured plant starts to eliminate plant pathogens, Clone or Propagation room, Vegetative room, and Flowering rooms; each of these rooms will be under constant surveillance and always locked. Additional rooms to support our cultivation process include a dry room, trim room, cure room, supply storage, and separate trash rooms for general use and an enzyme bioreactor to eliminate plant waste in an environmentally friendly way.

Our facility will be built using an aeroponics cultivation system on terraced panels mounted to rolling racks to grow without any media, eliminating hundreds of tons of landfill waste from grow media. This system utilizes a recycling runoff system reducing water / waste nutrients by more than 85% compared to drain-to-waste systems in traditional grow media. This system also produces root mass clean and free from media, which is harvested and extracted to be used in medicinal compound research and product development. Our lighting is also sustainable, using Fluence LED lights which are controlled by a centralized environmental control system called GrowLink. We will purchase and appropriately store all equipment, tools, nutrients, and pesticides prior to starting operations. This equipment will include water filtration and reverse osmosis systems, tissue culture agar and equipment, plant sprayers, screen filters, and trim drying racks. We will staff a full team of cultivation employees, including Director of Cultivation, Director of Tissue Culture, Integrated Pest Management Specialists, Quality Control and Assurance staff, and Cultivation Associates. To protect our staff, we will abide by OSHA standards and always have available and mandate the use of personal protection equipment (“PPE”) in cultivation areas, including spray suits and face masks. Within 60 days of licensure, and at least 30 days prior to commencing cultivation, we will notify the Department that we are prepared to begin such practices and seek Cultivation Authorization, or else face revocation of our license. 64-4.005(2); 64-4.004(3)(a).

Under the supervision of the Ceceilia Zapata, Ph.D., Director of Tissue Culture, the cultivation staff will use a variety of tissue culture techniques to encourage rapid, vigorous growth of pathogen free plants in clone and Vegetative rooms to ensure a sufficient number of healthy plants to supply the Flowering rooms. 64-4.002(2)(a)(9)(a). The Tissue Culture Clone room is dedicated to the germination of genetic tissue after removing any plant pathogens or viruses during initial replication and production. Once the tissue culture clones are rooted and hardened, they are ready for the vegetation stage where our DOC takes responsibility in the chain of custody. The Vegetative room is designed to encourage full root establishment and robust plant structure before plants are moved to the Flowering rooms. Flowering rooms will house marijuana plants for 8-9 weeks until they are ready for harvest. In each cultivation room we will utilize a specialized environmental control system to moderate temperature, humidity, lighting and CO2 levels; these systems will allow consistent phytochemical and THC levels. 64-4.002(2)(c)(5)(d); 381.986(8)(b)(3). Our DOC will set automated controls of heat, humidity, light, and CO2 parameters, which cultivation staff will continuously monitor. All staff will complete training sessions prior to beginning work with us on these practices, our internal operating procedures, and related health and safety policies. Managers will conduct these trainings, document results in training logs, with an ongoing responsibility to correct any deficiencies. Each cultivation staff member will have the responsibility to protect their individual and team health by following our established safe work procedures.

For certain cultivation applications like breeding and genetics R&D, we will use grow media that meets federal and state standards. All source grow media and solids will be sampled and analyzed before use in cultivation. After initial genetics germination, all subsequent plants will be propagated by tissue culture multiplication after virus/pathogen sterilization.

Clones will be propagated and should have developed root systems appropriate for transplanting within two weeks. 64-4.002(2)(a)(9)(d). We will batch and place plants according to their flowering time and implement a perpetual harvest cycle by staggering the flowering cycle start date of each room, ensuring a consistent and steady supply. All plants will be fed via recycling mister irrigation. 64-4.002(2)(c)(5)(c). Multiple reservoirs are centrally located feeding the cultivation rooms with injectors controlled by the environment control system. The reservoirs will contain a mixture of RO water and a concentrated fertilizer slurry that will be programmed and automatically adjusted to the proper ppm/EC levels during different growth stages of the marijuana plant cycle. The irrigation water will also be automatically adjusted to the proper pH level based on in-line sensors to ensure efficient nutrient uptake. Marijuana plants will be pruned regularly to encourage adequate growth traits and to maximize flowering sites on the plant. Pruning will also be used to maximize the yield potential of individual plants and to eliminate flowering sites that do not receive adequate light due to the full canopy.

Within six months of commencing cultivation operations, we will have a perpetual weekly harvest cycle. Once the marijuana plants reach full maturity, as determined by our DOC, plants will be cut down at the stalk base in the Flowering rooms and transferred to the Trim / Bucking room. Bucking (removing buds from stems) will be conducted while the flowers are wet using the Mobius MBX bucking machine. Cultivation staff engaged in the harvest process will wear gloves and Tyvek suits to prevent contamination. After marijuana flowers are processed by the bucking machine, we will move them to the AutoCure Drying Chamber where the flower is placed on racks inside the chamber. Auto Cure utilizes an airtight curing environment which uses laminar air flow dynamics to vent relative humidity in cycles according to the humidity of harvested cannabis flower. This technology ensures consistent, repeatable results while eliminating the risk of

microbial activity. Once the system determines proper moisture content and curing is complete, we will package marijuana flowers in sealed containers in compliance with department regulations. All plant touching equipment and surfaces will be 304 stainless steel and GMP certified. Samples of batches, based on a percentage of total batch size, will be sent out for analytical testing by a Certified Marijuana Testing Laboratory. 64-4.212(7).

Strains of Marijuana

Under the direction of our DOC, we will select and breed a variety of chemovars, which include low-THC offerings. We will cultivate 8-week and 10-week flowering strains. One low-THC strain we will cultivate is called Anomaly, which has an average cannabinoid profile of 14% CBG and 0% THC, has a 9-week growing cycle, and is exceptionally disease and pest resistant. 64-4.002(2)(c)(8). High CBG content has been shown to have strong anti-inflammatory properties while helping to regulate appetite and sleep, without the psychoactive or sedative effects of THC. Another strain we will cultivate is called Super CBD which has an average cannabinoid profile of 18% CBD and 0.3% THC and has a 10-week growing cycle. High CBD content has been shown to help with sleep, nerve pain, muscle spasms and anxiety. Another strain we will cultivate is Honey Peach Auto, which has an average cannabinoid profile of 12% CBD and 12% THC in a 1:1 Ratio. 64-4.002(2)(c)(8). This cultivar's 1:1 ratio of CBD:THC can offer high levels of pain relief while staying alert.

Amount of Marijuana and Adequate Supply

Based on our existing facility size of 25,375 square feet and initial flowering canopy area of 4,480 square feet, we expect to cultivate 2,467 pounds of marijuana flower on an annual basis. 64-4.002(2)(c)(5)(a). This conservative projection based on the industry average of 50g/sf and 5 harvests per year aligns with OMMU retail sales data for 2023, and adequately supplies our 3

dispensing facilities. We will make this marijuana available to patients at our 3 dispensing facilities already secured, 2 in Cape Coral and 1 in Port Charlotte, at pickup locations , and we will also deliver medical marijuana directly to patients in the Cape Coral, Fort Meyers and Port Charlotte areas.

Tracking Marijuana Plants

We will assign a unique identifier to each plant that we cultivate which is scanned with a barcode reader and assigned to the room the plant is located inside the facility, adding batch numbers upon harvesting, bucking, drying, trimming and consolidating marijuana flower by strain, according to proper seed-to-sale and GAP tracking procedures. This information will be recorded in our seed-to-sale inventory tracking software and will support production tracking, product labeling, and facilitating necessary recalls. 64-4.002(2)(d)(5). We will implement the **119.071(3)** and inventory tracking system to track all marijuana plants within a harvest and any manufactured products made from those plants as they move from production to being dispensed to patients; **119.071(3)** integrates with the BioTrack system selected by the Department and with the state medical marijuana use registry. 381.986(8)(d); 381.986(8)(a). This system will store our inventory records and will always be accessible to the Department. 381.986(8)(d). **119.071(3)** is a leading inventory tracking system for the cannabis industry and will allow us to track and report to the state accurately and compliantly.

Inspecting Seeds and Plants

We will inspect seeds and growing plants for plant pests that endanger or threaten the horticultural and agricultural interests of the state in accordance with chapter 581, covering the Plant Industry, and any rules adopted thereunder. 381.986(8)(e)(6)(c). “Plant pest” are any living stage of any insects, mites, nematodes, slugs, snails, protozoa, or other invertebrate animals,

bacteria, fungi, other parasitic plants or their reproductive parts, or viruses, or any organisms similar to or allied with any of the foregoing, including any genetically engineered organisms, or any infectious substances which can directly or indirectly injure or cause disease or damage in any plants or plant parts or any processed, manufactured, or other plant products. 581.011(26). Our Director of Tissue Culture will collect and test plant tissue samples regularly in collaboration with a Certified Marijuana Testing Laboratory (“CMTL”) and follow proactive genetic cleaning procedures to remove and prevent any systemic viruses or diseases from infecting clone plant stock. Our DOC will train and oversee our cultivation staff in inspecting seeds and plants to preclude pests that jeopardize our sanitary and compliant operations. Each day, cultivation staff will visually inspect all seeds and plants for threats and take tissue samples from plants at all growth stages for 3rd party testing by Kaycha Testing Labs, a Certified Marijuana Testing Laboratory (“CMTL”) based on a randomized sampling procedure, notify management of potential issues, and quarantine / destroy dangerous seeds or plants. Our staff will inspect seeds and plants in accordance with our GAP compliant standard operating procedures.

We will quarantine and place under stop sale using a Hold Order and Quarantine (Form FDACS 08016) all nursery stock found infested or infected with a plant pest, pathogen or virus and we will not be eligible for “certification” until the plant pest has been eliminated and we are released from quarantine and stop sale by the Department. 5B-2.0025. The “Certificate of inspection” is an official document stipulating compliance with the requirements. 581.011. In addition to our own inspections, we will always accommodate permitted Department employees for facility inspections, whether planned or spontaneous. 5K-11.002(3); 381.986(10)(a).

Pesticide Use and Fumigation

Cultivation staff will be responsible for all plant maintenance and inventory in their assigned cultivation rooms. Responsibilities will include duties such as watering, irrigation, transplanting, pruning, inspecting, recording, and pest management. Our cultivation process will use best practices from the marijuana and agricultural industries to limit contamination including mold, bacterial diseases, and rot. Tissue cultured plants and procedures are greatly superior to the traditional mother & clone clipping methods which spread systemic diseases from aging mother plants to the subsequent clone stock. If plant or pest issues arise in the veg or flowering stages, we may use pesticides determined by the department, after consultation with the Department of Agriculture and Consumer Services, to be safely applied to plants intended for human consumption but will not use pesticides designated by a rule as a “restricted-use pesticides” pursuant to s. 487.042. 381.986(8)(e)(6)(a). “Restricted-use pesticides” may generally cause, without additional regulatory restrictions, unreasonable adverse effects on the environment or injury to the applicator or other persons. 487.042. We will only apply pesticide registered with FDACS and will apply it in accordance with its label or labeling directions and conditions for “minimum risk” and U.S. EPA registered pesticides. 64-4.013. Our DOC has experience using beneficial biologicals like predator mites and ladybugs that have no negative effect on the plants or people as an organic alternative to spraying which will be used as part of our preventative IPM measures with the oversight of an IPM specialist

We will perform fumigation or other treatment of plants, or remove and destroy infested or infected plants, in accordance with chapter 581 and any rules adopted thereunder. 381.986(8)(e)(6)(d). The FDACS Division of Plant Industry is authorized to supervise or cause the fumigation or treatment of plants and plant products infested or infected by plant pests or so exposed to infestation or infection that it is reasonably believed that infestation or infection could

exist. 581.161. The fumigation or treatment may be performed by employees of the Division or other persons supervised by an authorized representative of the Division. 581.161.

Sanitation and Waste Disposal

Cultivation staff will maintain appropriate levels of sanitation in all cultivation areas and keep assigned cultivation rooms clean and free from hazards by utilizing sanitizing and disinfecting agents with safe and compliant active ingredients. Potentially toxic items will be labeled, identified appropriately, held, and stored in the cultivation supply room in a locked and labeled cabinet in accordance to GAP (good agricultural practices) with an access log to protect marijuana and staff from being contaminated or accidental use. We will work with a Certified Marijuana Testing Laboratory (“CMTL”) for Certificate of Analysis of our products. Any testing results indicating non-compliance will be immediately reported to the Department. Marijuana that fails testing or is otherwise identified as unacceptable will be immediately quarantined. Quarantined products will be labeled appropriately by staff and recorded in our inventory management system as soon as they are identified. All staff responsible for waste and quarantine related tasks will wear proper personal protective equipment, including closed-toe shoes, gloves, Tyvek suits and eye protection.

Our cultivation facilities and practices will comply with federal and state regulations regarding sanitation and waste disposal, including the Department’s MMTC Marijuana Waste Management and Disposal Rule. 64-4.207; 64-4.207(4). (2). We will keep an up-to-date waste disposal plan and provide a minimum of 72 hours’ notice in the MMTC’s seed-to-sale tracking system, BioTrack THC, prior to destroying any marijuana. 64-4.207(6); 64-4.207(8). If marijuana is destroyed on our premises, we will record the date and time of disposal; manner of disposal; volume and weight of the media used to render the marijuana waste unusable; reasons for disposal; signature of the manager overseeing disposal; video recordings; and, if the medical marijuana waste for disposal

contains plant material, the batch number, strain, volume, and weight of the plant material being disposed of. 64-4.207(7). As part of the waste disposal process, staff will render Marijuana Waste materials unrecognizable and unusable. 64-4.207(4). For community safety, all components of cannabis waste will be indistinguishable from general trash and will be incapable of being salvaged and consumed. 64-4.207(3). We will utilize an enzyme bio-digester for on-site composting of all suitable green waste in compliance with Chapter 62-709, F.A.C. to minimize our environmental impacts.

All facility recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed per applicable state and local statutes, ordinances, and regulations, and rigid internal procedures. 42 USC §6901. To prevent contamination, our plan for keeping a clean and sanitary cultivation process includes cultivation staff donning appropriate personal protective equipment prior to working directly with the plants. For non-marijuana solid waste, we will have trash cans and recycling bins throughout the facility. Staff will collect, weigh, and log medical marijuana waste throughout daily operations within BioTrack. We will also abide by all Environmental Protection Agency and OSHA guidelines and dispose of all chemicals ethically and safely. 381.986(8)(e)(10)(c). Upon rendering marijuana products unrecognizable and unusable, staff will place the waste in uniformly opaque, unmarked garbage bags barren of any logo or text, and dispose of the waste in a secured area on our premises to prevent unauthorized access and unlawful product diversion. 64-4.207(3). We will contract with an appropriately licensed waste disposal company to pick up our waste. 64-4.002(2)(c)(2). Kara Lavaux, Chief Compliance Officer will review these procedures at least quarterly to maintain ongoing compliance with federal and state regulations regarding sanitation and waste disposal and in accordance to GAP (good agricultural practices)

SUBSECTION 4.4.2 – CULTIVATION INFRASTRUCTURE

Our cultivation facility plans, equipment, creation of a sanitary and compliant environment, horticultural and environmental control systems, irrigation and water resources, and our facility infrastructure will enable us to produce superior cannabis products for our qualified patients. Tyler Doster, Director of Cultivation (“DOC”) and Sean Carriger, Chief Operating Officer (“COO”) have a combined 24 years of experience successfully designing, building and establishing cultivation infrastructure systems and building cultivation businesses, and will guide us in designing and developing our operations efficiently and compliantly.

Proposed Cultivation Facility

We own our proposed cultivation facility located at 119.071(3) which is approved for the operation of a marijuana businesses. We will cultivate in a locked, fully indoor grow facility. Total space we will use a total space of 24,375 square feet (SF) for our cultivation operations, with an initial flowering canopy of 4,480 sf. The capacities of our supporting cultivation areas are: (1) Flower Rooms (4,480 sf); (2) Vegetation Room (1,920 sf, 42.8% of flower canopy); (3) Tissue Culture/Clone Room (960 sf); (4) Bucking & Trimming Room (320 sf); (5) Dry Rooms (640 sf); (6) Cure Room (320 sf). We have also designated space to support adding an additional 1,920 sf of flowering canopy. This increases the total flowering canopy to 6,400 sf, supported by the existing 1,920 sf of vegetation canopy at the industry standard ratio, 30% of flower canopy. This additional flowering canopy space is reserved to support our year 3 expansion plans for 2 additional dispensing locations detailed extensively in section 4.12.2. Additional rooms will support our cultivation process, such as packaging, security, IT server, marijuana product vault, supply storage, offices, and separate trash rooms for general use/plant

waste. Our facility is located on a 3.5-acre parcel with sufficient parking for all staff, visitors, and high docks and ground level bay doors supply deliveries.

Our cultivation center is not located in proximity to schools. 381.986(11)(a). This property will have adequate security features for safe operations detailed extensively in section 4.7.2. All marijuana will be cultivated within an enclosed structure and in a room separate from other plants/products. 381.986(8)(e)(6)(b). Our cultivation processes will not be visible or accessible from a public place. Each cultivation room will be under constant video surveillance and always locked. 381.986(8)(f)(1)(b). To further the security of our operations, there will be at least two employees on premises at all times to protect our products. 381.986(8)(f)(6).

Proposed Cultivation Environment

Our proposed cultivation environment will consist of fully indoor spaces for all related activities, with room for expansion, having all areas controlled/monitored with advanced environmental control systems. We will maintain our entire facility sanitary and comply with local regulations regarding sanitation/waste disposal. 64-4.002(2)(c)(2). Our Facility Manager and janitorial staff will oversee cleaning/sanitation and will keep records of such activities. We will provide activity-specific PPE for all personnel, including nitrile gloves, respirators, hair/ beard nets, protective goggles, ear plugs, and well-fitted uniforms unlikely to be caught in machinery. Proper handwashing facilities/procedures will maintain the necessary sanitary environment within the facility, and we will follow CDC recommendations for handwashing.

Staff will perform regular cleanings and wear proper personal protective equipment (PPE) to keep all production areas clean and free of debris to minimize risk of contamination of cannabis products. We will select building materials for internal surfaces and clean rooms that are conducive to sanitation and maintenance, such as sturdy and cleanable walls, floors, drains, and work

surfaces. It is also important that we utilize an environmental control system called GrowLink to tightly control other variables within the facility such as the air, water, lighting, ventilation, temperature, humidity, and CO2. Staff will maintain and sanitize equipment at appropriate intervals to prevent malfunctions or contamination that could alter the safety, identity, strength, quality, or purity of our marijuana items beyond their established specifications and in compliance with Good Agricultural Practices (“GAP”) standards.

Odor Mitigation

While conducted in enclosed areas, odors could escape a facility. Accordingly, we have a comprehensive method for mitigating odors. 64-4.002(2)(e)(8). Our COO will introduce himself to surrounding businesses and create a system to intake comments/complaints related to our establishment, including nuisance odors. Our Facility Manager will oversee a plan to control/mitigate odors associated with our businesses. This will protect the health of our employees, clients, vendors, and our community. We will identify potential sources of nuisance/noxious fumes, dust, or odor-emitting activity to mitigate and will partner with an industrial hygienist to pinpoint odor risk areas. Environmental controls will keep our facility & cultivation rooms at an optimal temperature to minimize terpene emission, keeping these odor-emitting molecules within the plant. Our HVAC system will include in-line scrubbers and carbon filters properly sized for the air exchange rates of the rooms they service. Where necessary, we will place and replace odor-absorbing charcoal filters. In addition to the air filtration, we will also augment the building’s ventilation system to create negative air pressure throughout the building to prevent air/odors from escaping when doors are opened. When possible, we will store marijuana in airtight and locked containers. Additionally, we will store all marijuana waste in locked

dumpsters/containers. Finally, we will train staff in the proper operation of doors, windows, & vents in our facility to decrease the possibility of odors escaping our premises.

Cultivation Systems

Our cultivation system for flowering rooms will utilize PIPP rolling rack systems to maximize available floor space and will use an aeroponic cultivation system utilizing terraced modules with a recycling mister system to grow without media. Tissue cultured clones are transplanted into aeroponic EZ cloners where plants are secured via neoprene pucks, which are then transferred into the terraced grow modules. This system reduces water and nutrient consumption by more than 80% compared to traditional drip irrigation systems.

Lighting and Power

Our cultivation facility has 1800amps of existing power, with no need for power service upgrades upon licensure. We will utilize the city's power grid & will augment city power with solar panels & high-capacity batteries to decrease carbon footprint. Local power provider, Lee County Electric Cooperative, can provide our facility with the electricity required without any infrastructure upgrades. Our electricity load will be significantly lower than traditional indoor grows due to use of solar resources, LED lights, & environmental control systems. Additionally, our fertigation equipment features water-powered injectors that do not require electricity.

Lighting strategies will differ among various cultivation phases. Clone plants will utilize low wattage Fluence RAZR Series LED lights for maximum energy efficiency. Vegetative plants will be grown on 3 tiered PIPP racks, utilizing Fluence SPYDR Series lights designed for low heat distribution/energy conservation with less light intensity. Flower rooms will be illuminated with high intensity (3500 umol/s) Fluence RAPTRi LED lights with dimmers for maximum yield potential at an industry best efficacy rate (3.6 umol/J). Clones/vegetative plants will receive at least

18 hours of light each day; flowering plants will be exposed to light for 12 hours each day. Lights will be equally distributed across the entire grow space, controlled and monitored by GrowLink, the whole facility environmental control system.

Data Collection

We will utilize a seed-to-sale tracking system that communicates with BioTrack LLC, the system selected by the Department for medical marijuana use. 381.986(8)(d); 381.986(8)(a). This will allow us to gather, store, and if needed recover, all inventory records and activity. We will train all staff in working with the inventory management system to ensure compliance. Our inventory records will include harvest dates, batch numbers, and chain of custody details. All our data will be stored in multiple forms to ensure no loss of information. Daily, our cultivation staff will inspect plants for pests/disease and record this in our inventory systems, and our DOC will examine/record results of trichome head cloudiness with a 30x magnification hand lens to ensure harvesting at peak plant maturity.

We will collect/track/analyze data from environmental controls & fertigation system and examine the correlation to yield and quality to improve our energy efficiency and production potential. Our QA team will collect data from each batch for the purpose of process improvement and creating the highest quality products for our qualified patients. We will also collect feedback from patients and the general public and incorporate constructive feedback to ensure product quality, production decisions and patient satisfaction is being monitored and adjusted as needed.

Nutrient Dispersal

Our fertigation system is programmed and controlled via Growlink, our environmental control system, utilizing Anderson injectors water powered dosing technology. This equipment features water-powered ratio feeding injectors that do not require electricity, instead using volumetric

proportioning to inject fertigation materials into water lines reliably and accurately regardless of variations in pressure and flow. Our fertigation area will encompass the fertigation equipment necessary to disperse nutrients to all plants throughout the facility. All plants will be fed via recycling mister irrigation. 64-4.002(2)(c)(5)(c). Multiple reservoirs are located in the centralized fertigation area, feeding growth-phase specific nutrient blends to the entire facility.

Irrigation and Water Resources

Our facility will derive ample water resources from the municipal water supply, provided by Cape Coral Utilities Department. Water will be pumped through different lines and undergo different treatments for plant use / general facility use. We will maintain water quality with use-specific filtration systems. The water filtration system for plant use will be Hyperlogic reverse-osmosis system, which filters sediment, chemicals, heavy metals and other contaminants to achieve the proper qualities for optimal plant health and stable nutrient mixing. Reservoirs in the centralized fertigation area will contain plant-ready water and a concentrated fertilizer will be added according to the proper parts per million and electrical conductivity levels that are required for each stage of the marijuana plant cycle by our fertigation injector system. The irrigation water will also be adjusted to the proper pH level to ensure proper nutrient uptake. Our cultivation staff will prepare and oversee nutrient regiments specific to each type of chemovar and each phase of plant growth. Consistent and recorded watering procedures will produce data for our team to assess appropriate feeding and watering schedules based on historical plant performance.

Potable water will be available to staff and visitors at specified drinking fountains within our facility. We will also designate sinks throughout the facility exclusively for hand washing, with hand washing instructions from the CDC posted above these sinks. Our cleaning closet will provide water for janitorial use and a floor drain.

Environmental Controls

Our comprehensive environmental control system of choice is manufactured by Growlink, a leader in automated environmental controls for the cannabis industry. The Growlink system will control the temperature, light intensity and time cycles, humidity, CO2 concentration, nutrient mixes, and water treatment parameters, all customizable based on the room, plant growth phase, and Vapor Pressure Deficit (“VPD”) parameters. 64-4.002(2)(c)(5)(d). We will control the environment in other rooms that support our cultivation process, such as the dry room, bucking / trim room, cure room packaging and fertigation room, supply storage, marijuana product vault, and trash rooms for general use and plant waste. Our DOC will set automated controls of heat, humidity, and light parameters, which cultivation staff and our quality control staff will continuously monitor. Importantly, our environmental control system has alarms to warn of deviations from set points in single or multiple zones, which can save entire crops from failure.

Backup Plans

In the event of a general power failure, we will have on site a natural gas-powered generator to sustain our facility. Our environmentally friendly solar panels & batteries will also provide power in an emergency. We will have a backup battery-powered alarm system, which will activate automatically when the primary alarm system is down. We will always maintain critical business records digitally in addition to physically; this process provides a failsafe for our inventory and other important data. If our cultivation equipment becomes inoperable, our cultivation staff will perform as much of the process by hand as possible, and we will immediately contact maintenance staff or contractors to fix malfunctioning equipment. If multiple systems have failed and our operations can no longer continue, we will communicate immediately with the Department our present state and our plan to regain functionality.

SUBSECTION 4.4.3 – ABILITY TO SECURE CULTIVATION INFRASTRUCTURE

Cultivation Facilities, Systems, and Infrastructure–Secured

We have secured [REDACTED] 119.071(3), a 25,375sf facility for our cultivation operations. This property is currently owned by our Founders & Board Members James Morrisette and Christopher Mitchell, who are fully aware and consent to the use of this property for the purpose of our medical marijuana business. 64-4.002(2)(c)(1)(a). We will never enter into profit-sharing agreements with lessors. 381.986(8)(e)(3).

Cultivation infrastructure, as well as other infrastructure required, will be secured through the financial commitments made by Chicago Atlantic Group, LLC and (SPAC). Collectively these two financing sources have pledged up to \$30 million dollars and applicant currently has \$2.4 million dollars cash on hand available for operationalizing post-licensing award. We have submitted herein floor plans, security overlays, property, building, ownership information and documentation, as well as all letters of intent, zoning approval, municipal approval, warranty deeds of properties, operating agreements, certificates of formation, and other supporting cultivation infrastructure documentation. Our facility has secure and clearly marked entrances, driveways, and parking areas, and is located close to public transport infrastructure.

We have secured all potable water sources and specific handwashing sinks as well as all infrastructure needed for our sanitation protocols including access to potable water sufficient for irrigation and hot water, as well as electrical service, a nearby easily accessible roadway, product transport and delivery vehicles, a natural gas back-up generator, and odor mitigation systems including negative air pressure throughout the facility.

We have also secured staff to fill roles including Tyler Doster, Director of Cultivation (“DOC”), Cecilia Zapata, Ph.D., Director of Tissue Culture, Edgar Asebey, Chief Executive

Officer (“CEO”), Sean Carriger, Chief Operating Officer (“COO”), and Kara Lavaux, Chief Compliance Officer (“CCO”). Our cultivation staff have the knowledge and experience to cultivate low-THC cannabis. 64-4.002. These individuals will create a set of procedures and protocols to begin our cultivation infrastructure and will lead the hiring and training of staff.

Cultivation Facilities, Systems, and Infrastructure–Not Yet Secured

We have identified, designed and intend to secure cultivation systems and infrastructure such as; water reclamation systems, industrial dehumidifiers, GrowLink environmental control system to manage the entire facility, Hyperlogic reverse osmosis water filtration system, Anderson injectors for inline mixing, Fluence RAPTR, SPYDR and RAZR Series LED grow lights, CO2 atmospheric injection equipment, PIPP rolling racks, Aeroponic terraced grow modules, smart scales, GMP-compliant Mobius M108S wet/dry trimming machine, GMP-compliant Mobius M9 inflorescences sorting and grading machine, Mobius M210 cannabis mill, auto-cure drying system, GMP-compliant Blackbird pre-roll machine, and enzyme biodigester systems for green waste disposal. Additionally, our cultivation infrastructure includes SIP panel insulated walls with antimicrobial surface finish for maximum cleanliness, and an antimicrobial floor finish. Other cultivation infrastructure includes analytical equipment, safety equipment, computer systems and software, ventilation and exhaust systems, sanitation equipment, communication systems (in house and for delivery), POS/ICS terminals, seed-to-sale tracking system, security systems (locking systems for ingress/egress, alarms, surveillance), climate control, etc.)

Upon securing a license, we will structure our cultivation facility to include distinct rooms for growing marijuana, separated from any other plants and business processes. 381.986(8)(e)(6)(b). Upon licensure we will purchase all the equipment necessary for our business in stages as we complete facility buildout, beginning with security / controlled access followed by cultivation

equipment as rooms become ready for outfitting. Upon licensure, we will obtain a special plant permit from the State and always maintain proper security for our plants. 581.083. Our DOC will select and implement an inventory tracking system, 119.071(3) that integrates with BioTrack THC, the see-to-sale system selected by the Department, and with the state medical marijuana use registry. 381.986(8)(d); 381.986(8)(a).

Timeline for Securing Infrastructure

119.071(3) Cultivation facility is already secured. No later than 60 days post application approval, we will apply for Cultivation Authorization. 64ER21-10(7). Before this point, we will procure all cultivation equipment and complete facility renovations. James Morrisette, Founder and Board Member has FL Certified General Contracting License #CGC1505190, Mechanical Contracting License #CMC1249280, and Roofing Contracting License #CCC1330026 to expedite all facility construction to stay on schedule and within budget. We will welcome Department staff for an inspection to solidify our cultivation status. 64ER21-10(7)(b); 64ER21-10(7)(e). If any deficiencies are identified in the Department's notice to our business post-inspection, we will submit a written plan of correction to the Department within one week. 64ER21-10(7)(c). These corrections will be implemented within 30 days of notice given by the Department. 64ER21-10(7)(d). Once we obtain a cultivation authorization certificate from the Department, we will begin cultivation activities. No marijuana will be present on our property prior to Department authorization. 64-4.004(1)(a); 64ER21-10(6).

Infrastructure Assumptions

Facility building and foundation are structurally sound; adequate power is present and adequate for intended cultivation plan; existing HVAC and water systems are functional and adequate for

general purpose use; parking, loading and vehicle access are adequate for expected work force and operational needs; zoning and intended use are approved.

Timeframe for Obtaining Authorization

Pursuant to section 381.986(8)(e), Florida Statutes, licensed MMTCs will cultivate, process, transport, and dispense marijuana for medical use. MMTCs are vertically integrated and are the only businesses in Florida authorized to dispense medical marijuana and low-THC cannabis to qualified patients and caregivers. According to MMTC Authorization Procedures, each MMTC must receive authorization at three stages prior to dispensing low-THC cannabis or medical marijuana: (1) cultivation authorization, (2) processing authorization, and (3) dispensing authorization. 64ER21-10(7). Within 60 days of licensure, and at least 30 days prior to commencing cultivation, we will notify the Department that we are prepared to begin such practices and seek Cultivation Authorization. 64-4.005(2); 64-4.004(3)(a). We will welcome Department staff to inspect the cultivation facility within 14 business days of the Request for Authorization. 64ER21-10(7)(a). We will submit a written plan to correct any identified omissions, deficiencies, or violations within seven calendar days of receipt of the Department's written notice. 64ER21-10(7)(c). These corrections will be implemented within 30 calendar days of notice given by the Department. 64ER21-10(7)(d). Once we obtain a cultivation authorization certificate from the Department, we will begin cultivation. No marijuana will be present on our property prior to Department authorization. 64-4.004(1)(a); 64ER21-10(6).

Within 120 days of licensure, and after successfully obtaining Cultivation Authorization, we will then submit a request for Processing Authorization. 64ER21-10(8). 64ER21-10(4). The Department will inspect the processing facility within 14 business days of the Request for Authorization. 64ER21-10(8)(a). We will submit a written plan to correct any identified omissions,

deficiencies, or violations within seven calendar days of receipt of the Department's written notice. 64ER21-10(8)(c). These corrections will be implemented within 30 calendar days of notice given by the Department. 64ER21-10(8)(d).

Within 180 days of licensure, and after successfully obtaining Processing Authorization, we will complete the final authorization stage by submitting a request for Dispensing Authorization. 64-ER21-10(9). 64ER21-10(5). The Department will inspect the dispensing facility within 14 business days of the Request for Authorization. 64ER21-10(9)(a). We will submit a written plan to correct any identified omissions, deficiencies, or violations within seven calendar days of receipt of the Department's written notice. 64ER21-10(9)(c). These corrections will be implemented within 30 calendar days of notice given by the Department. 64ER21-10(9)(d). We will accommodate any and all updated State emergency rules and statutes, while abiding by all relevant federal laws.

Assumptions and Bases

Based on our highly qualified and experienced team, we will exceed the state's identified timeline for authorization and operations. Our CEO and COO have significant experience orchestrating operations for large teams, complex projects, and rigid schedules. Our DOC and COO have successfully designed, developed multiple cultivation operations, developed SOPs, researched, sourced, and purchased equipment, and hired and trained employees. Our CEO will oversee our startup timeline and ensure we stay on track.

To be operational within 60, 120, and 180 days of licensure for Cultivation, Processing and Dispensing locations, we have planned out a detailed schedule for each license category. Our schedule mainly includes permitting, engineering plans, and buildout; hiring and training of staff; purchase and installation of equipment; and development of SOPs. To be prepared in time, we will perform these activities concurrently and will requisitely begin preparations prior to licensure. The

amount of infrastructure we have already secured will help us to meet or exceed the prescribed timeline, and to produce exemplary, high-quality products for the citizens of Florida.

SUBSECTION 4.5.1 – PROCESSING PLAN

Methods of extraction, including extraction techniques and processes

Our team will process marijuana in accordance with the requirements of section 381.986(8), F.S. and Department Rules. Our Andrew Hall, Director of Manufacturing, is a Ph.D. Chemist with more than 10 years' experience in extraction, formulation, and extensive compliance work, and will lead and oversee our extraction techniques and processes.

Solvents, Gases, and Handling

We will comply with rules for solvents exhibiting potential toxicity to humans. 381.986(8)(e)(11)(b); 64ER21-13. Prior to making extractions, we will submit a request for inspection and approval from the Department, and ensure that we pass local fire code inspections. We will use Organic Solvent (Ethanol) that has a minimum purity of 99.5% and a supporting certificate of analysis for extracting marijuana in our Closed Loop System. Our solvent will be free of odorants, bitterants, or other additives, and will be stored, handled, and disposed of in accordance with applicable law. 64ER21-13(5)(c). The storage, handling, and disposal of Organic Solvents will comply with NFPA 30. We will process and store marijuana within an enclosed structure and in a room separate from other plants or products. 381.986(8)(e)(11)(a). We will comply with applicable fire, safety, and building codes in the processing, handling, and storage of Solvents. 64ER21-13(10).

Testing and Quality Control

We will comply with the CMTL Sample Testing rule. 64ER20-39. Our Final Products will pass regulatory compliance testing and will not exceed the enumerated Acceptable Limits for contaminants before being transported to a dispensing facility and dispensed. 64-4.212; 64ER20-32. We will contract with a CMTL to collect random, representative samples of Final Product from

every Retail Batch according to protocol. 64ER20-39(1). Upon receiving results from a CMTL, two employees will verify that the concentration of THC meets potency requirements, the labeling of the concentration of THC and CBD is accurate, and that all marijuana is safe for human consumption and free from contaminants that could be harmful. 381.986(8)(e)(11)(d). We will quarantine a failed Retail Batch and may arrange for retesting. 64-4.212(5)(c); 64-4.212(5).

Record Maintenance for Testing and Samples

We will record and maintain all testing results and Final Products in our Inventory Control System and the state's seed-to-sale system, BioTrack THC. We will record all testing samples, Data Packages, and Certificates of Analysis ("COA") of each Retail Batch. We will retain records of all testing and samples of each homogenous batch of marijuana for at least nine months, and we will reserve two samples from each batch for at least nine months for auditing purposes. 381.986(8)(e)(11)(d). We will retain transport manifests for at least three years. 381.986(8)(g)(1)(g)(III).

Treatment of Marijuana

We have established procedures for the treatment of marijuana that failed testing requirements under the statutes and CMTL Sample Testing Rule. 381.986; 381.988; 64ER20-39. Within 14 calendar days of receipt of a failed COA from a CMTL we will provide the department with a completed Notification of Resampling and Retesting form, provide the department with a completed Notification of Remediation form as provided in 64-4.213, ; or provide notice to the department via email indicating that the MMTC will dispose of the Retail Batch in accordance with 64-4.207 . If applicable, we will arrange for a previously failed Retail Batch to be resampled and retested by a CMTL. Prior to the resampling and retesting of a previously failed Retail Batch, we will provide the failed Certificate of Analysis together with completed Form DH8024-OMMU-

03/2021, Notification of Resampling and Retesting, to the Department via email. We will arrange for resampling and retesting of the previously failed Retail Batch within 30 calendar days of submission of the Notification of Resampling and Retesting form to the Department. Prior to the resampling and retesting of a previously failed Retail Batch, we will ensure the CMTL conducting resampling and retesting has a copy of the failed COA. The previously failed Retail Batch will be quarantined, clearly marked “not for retail sale,” and will not be transported to any dispensing facility or dispensed to a qualified patient or caregiver. A previously failed Retail Batch must pass two complete regulatory compliance tests using two new samples in order for the Retail Batch to be eligible for dispensation and may only be resampled and retested twice. If the previously failed Retail Batch passes the first retest, we will arrange for the Retail Batch to be retested again by a CMTL. If the previously failed Retail Batch passes the second retest, we will provide two passing Certificates of Analysis for the previously failed Retail Batch to the Department via email prior to removing the Retail Batch from quarantine and transferring it to a dispensing facility or dispensing it. If the previously failed Retail Batch fails either retest, we will dispose of the Retail Batch in accordance with 64-4.207, or remediate it if permitted by 64-4.213, and notify the Department. 64-4.212. If the product requires remediation, we will inform the Department by providing the failed Certificate of Analysis together with completed Form DH8025-OMMU-03/2021. Edibles will not be remediated but any derivative product that fails regulatory compliance testing for Residual Solvents, Microbes, or Mycotoxins may be remediated through further processing. After remediation, the product will be retested by a CMTL and will not be eligible for additional remediation. 64-4.213.

Quality Assurance Program

Our Quality Assurance (“QA”) program is overseen by Kara Lavaux, Chief Compliance Officer (“CCO”), and will track contamination incidents and document identified causes of such incidents and corrective action(s) taken. As part of compliance with GMP guidelines, our written SOPs will detail how to document contamination incidents. The incidents will be filed as a Corrective Action and will address the reason the incident occurred, the steps taken to mitigate the incident, and the preventative action that will be taken to ensure that the incident does not occur again.

Food Safety Good Manufacturing Practices Inspection

Our team has ample experience to pass a Food Safety Good Manufacturing Practices (GMP) inspection by a nationally accredited certifying body within twelve months of licensure. 381.986(8)(e)(9). We will conduct all Solvent-Based Extraction in our designated Extraction Area of our facility, which has passed a GMP inspection. 64ER21-13(6). We will immediately stop processing at our facility if it fails to pass this inspection until we demonstrate to the department that the facility has met the requirement. 381.986(8)(e)(9).

Nationally Accredited Certifying Body

We will use a nationally accredited certifying body, specifically the Global Food Safety Initiative, for the GMP inspection and will meet its guidelines/standards. 381.986(8)(e)(9). Our plan to pass a GMP inspection by a nationally accredited certifying body, within 12 months of licensure is built upon four pillars: implementation of SOPs, employee training, proper documentation practices, and Continuous Quality Improvement (“CQI”) through consistent auditing. 381.986(8)(e)(9). SOPs will be documented in our GMP Manual, including: employee personal hygiene responsibilities; food safety education and training; maintenance, layout, and operations of the food processing area; the design, construction, and maintenance of food

processing equipment; production and process controls; and, defect action levels that define acceptable ranges for product defects. Title 21 CFR, Part 110 (21 CFR 110). All employees who are involved in the preparation, handling, or storage of medical marijuana products will receive GMP training based on the practices outlined in the GMP Manual. Employees who have received these trainings must demonstrate an adequate understanding of GMP on an ongoing basis. The effectiveness of the GMP compliance program is evaluated by the CQI self-inspection and corrective action process, which documents the maintenance and continuous improvement of processes for product safety. Specifically, a self-inspection checklist will guide internal audits of production operations.

Plan for Packaging and Labeling

We will package and label usable products, as defined in the Department's Definitions Rule, in compliance with the requirements of section 381.986(8)(e)11.f, and the Department's MMTC Packaging and Labeling Rule 64ER20-32. Before dispensing usable product in any receptacle and packaging, we will obtain department approval of the use of the receptacle, label, and package. We will package all processed marijuana to be dispensed in compliance with the United States Poison Prevention Packaging Act of 1970, 15 U.S.C. ss. 1471 et seq. 381.986(8)(e)(11)(e). We will place usable product inside of a receptacle at the Department-approved processing facility. Receptacles will be placed inside of a package with a compliant patient package insert before the usable product is dispensed.

All product receptacles will be child resistant. In the case of multiple-use products and multi-serving edibles, the receptacle will be resealable such that it continues to be child resistant after each use or serving. The receptacle will have a firmly affixed and readable label(s) that includes only the information required or permitted by s. 381.986(8)(e)11.f. All required information on

the label(s) will be prominently and conspicuously placed on the package, multiple labels may be affixed if needed to display all required information. The universal symbol on every receptacle will be at least ¼ inch wide and ¼ inch high, and will be placed on the outer layer of receptacle labeling. 64ER20-32(3)(d).

The receptacle will not include depictions of the product or any graphics or images other than one image of our department-approved logo and the universal symbol. 64ER20-32(3)(e). The receptacle may include instructions, health information, or warnings and precautions, but will not include unsubstantiated claims that the usable product cures any medical condition on any labeling or packaging. Receptacles for derivative products that are not edibles will be a single solid color or clear and will not be neon, and where applicable, the lid of a receptacle will be the same single solid color or white. 64ER20-32(4). Receptacles for edibles will be plain, opaque, and white.

We will package all marijuana in a receptacle that has a firmly affixed and legible label stating the following information: the marijuana or low-THC cannabis meets the testing requirements of the department; the name of the MMTC from which the marijuana originates; the batch number and harvest number from which the marijuana originates and the date dispensed; the name of the physician who issued the physician certification; the name of the patient; the product name, if applicable, and dosage form, including concentration of tetrahydrocannabinol and cannabidiol; the recommended dose; a warning that it is illegal to transfer medical marijuana to another person; and, a marijuana universal symbol developed by the Department. 381.986(8)(e)(11)(f).

The receptacles will have a firmly affixed and readable label(s) that includes: a list of all the edible's ingredients in order of prominence which uses the common or usual name of food ingredients and identifies major allergens in accordance with the Food Allergen Labeling and Consumer Protection Act of 2004, Public Law 108-282, Title II (effective 8/2/2004); storage

instructions; an expiration date; a legible and prominent warning to keep away from children and pets; and, a warning stating that the edible has not been produced or inspected pursuant to federal food safety laws. 64ER20-32. The product name will not contain wording commonly associated with products marketed by or to children.

The text on a package will be a single solid color which will not be neon. The universal symbol will be printed on the package and will be no less than 10% of the overall surface area of the package. The package will identify every ingredient, in order of prominence, unless the ingredients are identified on the receptacle label or patient package insert. The package may contain a Product Stock-Keeping Unit (SKU), barcode, or other similar product identifier; cultivar name in black or white print lettering, in a sans-serif font not larger than 12-point font; a Quick Response (QR) code, or similar bar code or smart code that allows a patient to access the usable product's certificate of analysis and information related to the usable product being dispensed, provided that the information conveyed is information that is permitted to appear on the receptacle label, package, or patient package insert, and paper copies are available upon request. 64ER20-32.

Sanitation and Waste Disposal

Our processing facilities and practices will comply with federal and state regulations regarding sanitation and waste disposal, including the Department's MMTC Marijuana Waste Management and Disposal Rule (64-4.207). To prevent contamination, our plan for keeping a clean and sanitary processing area is based on pharmaceutical industry best practices. Before entering the facility, staff will use a coarse foot-brush to remove debris from their footwear. Upon entering the facility, all staff will step into sanitation foot baths. Processing staff will then pass through a locker room where they will: remove clothing that has been exposed to uncontrolled environments; shower with antibacterial, antimicrobial soap; and, don aseptic gowning, including specially designed

garments, coveralls, masks, gloves, hairnets, and beard nets (if applicable). We will also provide additional personal protective equipment (“PPE”) to protect staff health, such as earplugs, eye protection, and respirators, which staff will use when disposing of waste or handling potentially hazardous materials. After leaving the locker room, but prior to entering the facility’s processing area, staff will pass through an airlock entryway. The airlock will complete several air exchanges prior to allowing staff to enter the processing area. The two doors containing the airlock entryway will never be open at the same time, so as to cut off the air current from outside the facility.

We will implement rigid protocols for the disposal of solid, liquid, and hazardous waste that comply with the Florida Department of Environmental Protection’s Division of Waste Management, RCRA (42 USC §6901 et seq.), and EPA and OSHA guidelines, and will ensure all chemicals are disposed of ethically and safely. 381.986(8)(e)(11)(c). For non-marijuana solid waste, we will have trash cans and recycling bins throughout the facility. Staff will collect, weigh, and log medical marijuana waste throughout daily operations. At the end of the workday, staff will shred solid marijuana waste using an electric chipper in the Green Waste Quarantine room. If the marijuana waste is liquid or soluble, staff may mix them with water, bleach, or other appropriate liquid. After rendering products unrecognizable, staff will mix marijuana waste with at least 51% non-marijuana, post-consumer waste such as: shredded paper, soil, coco coir, coffee grounds, or sand to make sure all marijuana waste is completely unusable, beyond recovery. Upon rendering the marijuana products unrecognizable and unusable, staff will place the waste in uniformly opaque, unmarked garbage bags barren of any logo or text, and dispose of the waste in a secured area on the licensed premises to prevent unauthorized access and unlawful product diversion. 64-4.207(3). We will retain surveillance recordings for at least 45 days and all other Marijuana Waste records for at least two years. 64-4.207(7)(e). Staff will record the following information about

medical marijuana waste in the inventory control system: the date, time, and manner, along with the legible names and signatures of the persons responsible; video recording; and the waste collection service's name and agreement. 64-4.207(7).

Pre-rolled Marijuana Cigarettes

We will include pre-rolled marijuana cigarettes in our product offerings, and plan to use RollPros wrapping paper for the cigarettes paper bobbins or spools available in race paper or natural wood pulp. We will not use wrapping paper made with tobacco or hemp. 381.986(8)(e)(10).

Plan for Edibles

We will produce edibles as part of our processing plan. We will comply with all requirements for and obtain a food establishment permit pursuant to Chapter 500, F.S. and Chapter 5K-11, F.A.C. Before production of edibles, we will submit to the Department a completed MMTC Food Permit Application, FDACS-14031, (Rev. 12/19), remit in full the required permit fee, and provide to the Department a list of all edibles we intend to produce. We will demonstrate through an initial inspection conducted by the Department that the facility where edibles will be produced or manufactured meets inspection requirements established in Chapter 500, F.S., and paragraphs 5K-4.002(1)(c)-(e), subsection 5K-4.002(2), and Rule 5K-4.004, F.A.C.

Our control systems, overseen by our Director of Manufacturing ("DOM") will regulate the milligrams of THC in each edible and maintain potency variances of no greater than 15%. 381.986(8)(e)(8). Our extraction protocols and strict adherence to SOPs will provide stability and consistency in our products; With consistent starting material, edibles will be produced with a high degree of precision. This precision combined with rigorous testing protocols will ensure edible products have potency variability no greater than 15%, do not contain more than 200 milligrams

of THC, and that single serving portions of an edible do not contain more than 10 milligrams of THC. 381.986(8)(e)(8). We will implement sample quality criteria for all medical marijuana products, including edibles, that ensure samples are of a sufficient size, quantity, diversity, and consistency to effectively reduce imprecision error and sample bias error, thereby achieving a result that reliably reflects the batch/lot being tested.

Edibles may not be attractive to children; be manufactured in the shape of humans, cartoons, or animals; be manufactured in a form that bears any reasonable resemblance to products available for consumption as commercially available candy; or contain any color additives. 381.986(8)(e)(8). Through the variance request procedure which will include submitting a picture and detailed description, we will obtain approval of each edible product we intend to produce and dispense. The variance request will demonstrate that the proposed edible, including its packaging and labeling, are compliant with s. 381.986, and Department rules. All edibles will be shelf stable, which means that the edible can be safely stored at room temperature in a sealed container, and does not require refrigeration. We will not dispense edibles after the labeled expiration date, and we will compliantly dispose of expired edibles. We will immediately institute recall procedures upon discovery or receipt of written notice of a recall of edibles. 381.986(8)(e)11.d; 64ER20-35.

SUBSECTION 4.5.2 – PROCESSING INFRASTRUCTURE

Proposed Processing Facility

This plan describes the processing infrastructure we will develop at our licensed MMTC. Located at **119.071(3)**, 31,929 sf facility approved for the operation of a marijuana business. All marijuana will be processed within an enclosed structure and in a room separate from other plants or products. 381.986(8)(e)(11)(a). At every phase of construction, we will consult with state and local fire officials to ensure that all extraction and post-processing rooms meet fire code and safety requirements. All equipment and production spaces will be constructed with materials that are easily sanitized, such as metal insulated wall panels and stainless steel work surfaces. We will conduct all Solvent-based extraction in the designated extraction area of our proposed processing facility, which will pass a Food Safety GMP inspection in accordance with s. 381.986(8)(e)9., 64ER21-13(6), F.C.A. We will prominently display proof of inspection required by the department inside or immediately outside of the extraction area. Rule 64ER21-13(3)(c), F.C.A.

Proposed Processing Areas

The processing area is divided into distinct, fully enclosed rooms separate from the cultivation areas, each specific to an operational procedure. First, the 460 square foot Extraction Room will house our 30L Delta Separation CUP-30 cryo-ethanol extraction system coupled with a –80 degree ethanol chiller, avoiding the need for post processing or storage of compressed gases. This room is where all extraction activities will occur. The second room will be a 1,000 square foot Post Processing-Extraction Room, in which processing staff will conduct post-processing activities such as distillation and product infusion, with the exception of production of edibles and certain topicals. This room will contain a 16 square foot safety cage and will also hold quality assurance/quality control (“QA/QC”) testing equipment. Edibles and certain topical products will

be produced in a third room—a 648 square foot Commercial Kitchen. A package filling automation equipment line is housed in a 1,600 square foot room. A label and sealing automation equipment line is housed in a 2,100 square foot room, and bottle filling, encapsulation, and pill pressing automation equipment lines are housed in another 2,100 square foot room, all designed with air separation vestibules in compliance with GMP standards.

Extraction Equipment and Location

Extraction activities will take place exclusively within the Extraction Room. The extraction area will contain: a 30 liter CLES (closed loop ethanol extraction system); ; a chiller; a compressor; along with a roto vap machine to remove and recycle all solvents used within the extraction process; air curtains; a Type-II fume hood will be utilized for removal of escaped ethanol that may occur; a chemical spill containment workstation and portable chemical spill kit; three high-precision scales; and, stainless-steel extraction tables. Adjacent to the Extraction Room will be a Secure Storage area that will house solvents in locked, explosion- and fire-proof storage cabinets. The closed loop extraction system will be a commercially manufactured extraction system that is sealed during operation and designed to recover all solvents used during the extraction process through a feedback loop. Every pressure vessel within our Closed Loop System will have a rating of at least 125% of the maximum pressure, as specified in the manufacturer's maximum operational limits, not to exceed 10,000 psi. 64ER21-13(7)(b). All pressure vessels will contain an emergency pressure release system vented to the outside of the facility. An independent engineer will certify that the Closed Loop System was commercially manufactured, is safe for our intended use, and is built to codes of recognized and generally accepted good engineering practices, such as ASTM. The certification must include the independent engineer's signature and seal, the serial number of the Closed Loop System being certified, and the name of the MMTC using the Closed

Loop System. We will prominently display proof of the certification inside or immediately outside of the extraction area. 64ER21-13(3)(c), F.C.A.

Concentration Equipment and Location

The Post-Extraction Room will house: short path distillation equipment; a rotary evaporator; air curtains; a chemical fume hood; a laminar flow hood; a stainless-steel sink; stainless-steel benches; silicone trays; scraper tools; assorted silicone spatulas; a chemistry beaker and jar set; small silicone containers; desiccators; syringes; auto-pipets; a dishwasher; a centrifuge; a drying oven; a freezer; a locking medical refrigerator; a sonication device; a microwave digestion system; and, a water purification system. We will procure new equipment and update machinery as needed for new processes and improvements.

Analytical Equipment, Including Separators and Detectors, and Location

At the onset of operations, we will rely on third-party independent laboratories for analytical testing. Over time, we intend to integrate our own analytical equipment for internal QA/QC, purchasing equipment strategically based on results obtained from independent laboratories. As part of our two-year budget, we have earmarked \$250,000 for QA/QC equipment purchases. Equipment we may purchase includes: ICP-MS for heavy metal analysis; HPLC for potency analysis; and, GC-MS for residual solvent and pesticide analysis. This equipment will be located in the post extraction room. We may use a vibrating separator or centrifugal separator vibrating sieve or screen separator with various millimeter mesh sizes that are utilized on biomass to separate the stalks and stems from the bud. This allows us to more efficiently grind our starting materials, and to separate it for various uses once separated. We will have detectors for our extraction processes, specifically Carbon dioxide / hydrocarbon detectors. We will also have alarms for emergencies concerning facility security and environmental controls.

Safety Equipment, Facilities, and Location

For our processing areas and equipment, we will follow all applicable OSHA, EPA, and NFPA rules. Our exhaustive security plan includes comprehensive surveillance, adequate lighting, and access controls. In case of emergency, staff will have access to two manually-activated alarm systems to communicate with law enforcement: an audible panic alarm and a silent duress alarm, both of which signal that an employee is in danger and requires immediate law enforcement assistance. We will consider the ergonomic design of our workspaces so personnel can move freely around the facility with no undue physical burden, which reduces the risk of accidents.

Sanitation is essential to product and personnel safety. Accordingly, we will use chemicals, cleaning solutions, and other sanitizing agents approved for use on and around vegetables, fruit, or medicinal plants. All chemicals used in the processing of medical marijuana (and related waste) will be clearly identified, isolated, and securely stored in an explosion- and fire-proof storage cabinet that meets all NFPA and OSHA standards. A large sign on the cabinet will read: “WARNING: FLAMMABLE MATERIALS.” For a safe and sanitary processing facility, we will: utilize industry-leading, cryo-ethanol extraction methods; design a facility suitable for the workflows taking place; train employees in sanitation and safety procedures; provide personal protective equipment (“PPE”) for employees; and maintain detailed sanitation logs. Activity-specific PPE will be provided for all personnel, including nitrile gloves, respirators, hair nets and beard nets, protective goggles, ear plugs, and uniforms that are well-fitted and unlikely to be caught in machinery. Proper handwashing facilities and procedures are a key component of maintaining the necessary sanitary environment. We will follow all Center for Disease Control recommendations for handwashing facilities. Sanitation logs will document regular cleaning

procedures for surfaces, equipment, and utensils, and Kara Lavaux, Chief Compliance Officer will audit these regularly for compliance.

Access to Sufficient Potable Water and Hot Water

The facility will derive water from the city water supply, and will maintain water quality through additional filtration, if necessary, for manufacturing medical marijuana products. Potable water will be available to staff at specified fountains within the facility. We will designate several sinks for handwashing only, distinct from potable water. The Sanitation Officer will post signs that read “FOR HAND-WASHING ONLY” along with hand-washing instructions above these sinks. Hot water will be heated in an industrial water heater to a minimum of 100°F and will be of sufficient volume and pressure to remove dirt and contaminants from hands. Hand-washing facilities will be in all production areas and will be operated using a foot pedal or automatic sensor so that both hands are free for washing with no need to turn off the sink, which otherwise could contaminate clean hands. Emergency eye washing stations and decontamination showers will also be available to staff.

Odor Mitigation

Our odor control plan begins with a fully sealed building envelope, and each room within the facility will be independently sealed as well. We will remove odors with a carbon-filter-based odor reduction system, positive/negative air pressure exhaust system, and ONA odor-absorbing canisters. The building will be airtight. Additionally, each cultivation and processing room will be made of suitable materials, and methods of construction will provide an airtight, controlled environment for cultivation and processing. We will utilize magnehelic air pressure instrumentation to monitor and control positive/negative air pressures in the various spaces; a licensed/certified calibration agent will calibrate the magnehelic pressure instruments on a regular

basis. The processing space will exchange air in the room no less than 12 times per hour. Exhaust from every room will pass through activated-carbon filters before entering a sealed ducting system. All ductworks will be commissioned and pressure-tested to maintain a predetermined water column pressure, ensuring minimal air leakage. All air handlers will contain a pre-filter and a HEPA filter. All exhaust will contain two four-bank sets of carbon filtration. We will also install in-room carbon filtration for additional air treatment throughout the facility where needed. Finally, we will place ONA Gel odor-absorbing canisters throughout all areas of our facility to further minimize odor.

Processing Systems

Our inventory control system (“ICS”), 119.071(3) will seamlessly integrate with the state’s seed-to-sale tracking system, BioTrack THC. 381.986(8)(d); 381.986(6)(a). This will allow us to gather, store, and recover all inventory records and activity. The ICS maintains a log of every system action, including adjustments and voids, so that data may be fully reconstructed at any time, leaving no question as to the chain of custody or current location of a batch/lot at any time in processing operations. Section 381.986(8)(d). We will also collect feedback from patients and the public and incorporate constructive feedback for excellent customer satisfaction. Our facility will utilize the city’s power grid, augmented with solar panels and high-capacity batteries to decrease our carbon footprint. Our local power provider, Lee County Electric Cooperative], can provide our facility with the power we need for our activities. We will package and label usable products, as defined in the Department’s Definitions Rule, in compliance with the requirements of section 381.986(8)(e)11.f, and the Department’s MMTC Packaging and Labeling Rule 64ER20-32.

Computer Systems and Software

We will have a network of interconnected computers allowing for the sharing of data across the business, managed by our Inventory and Data Administration Manager. Desktop computers will connect to the internet via ethernet with firewall protection at the router (i.e., local area network (“LAN”)) and on every individual computer. Mobile devices and laptops will connect to the internet via Wi-Fi, protected by 119.071(3) security methods, the highest level of modern Wi-Fi security. We will use an intercom to communicate between different segments of the facility.

Ventilation and Exhaust System(S)

Our extraction room and post-processing room will have a Variable Air Volume (“VAV”) exhaust system that will control the supply and air volumes to achieve optimal temperature, ventilation, and safe exhaust. This ventilation and exhaust system is especially crucial for any solvent level that might be above the Permissible exposure limit (PEL) that may result in adverse working environments, suffocation or death, and our VAV exhaust system will safeguard against these potentially dangerous air conditions. These systems will also integrate with our odor control plan and environmental control system

Back-Up Plans for All Identified Systems

We will use a natural gas generator as a backup power supply for our processing facility. In the case of a power outage, the generator will sustain processing activities and critical safety systems until the grid restores power. Processing facility staff will store data in multiple locations. Internally shared digital folders will contain processing data that replicates information in the inventory control system. If access to computers ceases for any reason, we will have and maintain physical copies of SOPs and batch record documents that are necessary for processing tasks until computer access is restored.

SUBSECTION 4.5.3 – ABILITY TO SECURE PROCESSING INFRASTRUCTURE

Processing Facilities, Systems, and Infrastructure—Secured

We have secured [REDACTED] 119.071(3), a 31,929 sf processing facility that allows us to process marijuana in a location that is separate from other plants and products. 381.986(8)(e)(11)(a). This property is currently owned by Founders & Board Members James Morrisette and Christopher Mitchell, who are fully aware and consent to the use of this property for the purpose of our medical marijuana business. 64-4.002(2)(c)(1)(a). We will never enter into profit-sharing agreements with lessors. 381.986(8)(e)(3). This facility is separated into extraction and post-processing areas, and also has separate commercial kitchen and packaging, labeling, bottling, encapsulating and pill pressing areas for the production of edibles, vapes, tinctures, topicals, beverages, pills and capsules. The processing facility is ventilated and features substantial exhaust equipment and air handlers for odor mitigation and employee safety.

Processing infrastructure, as well as other infrastructure required, will be secured through the financial commitments made by Chicago Atlantic Group, LLC and (SPAC). Collectively these two financing sources have pledged up to \$30 million dollars and applicant currently has \$2.4 million dollars cash on hand available for operationalizing post-licensing award.

We have secured our management staff who provide the knowledge and experience for the technical and technological ability to cultivate, process, and dispense low-THC cannabis with regards to each of the items detailed in 64-4.002 Initial Application Requirements for Dispensing Organizations.

We have secured our processing facility and have submitted herein floor plans, security overlays, property, building, lease (property owner consent)/purchase information and documentation, as well as all letters of intent, zoning approval, municipal approval, warranty deeds

of properties, operating agreements, certificates of formation, and other supporting processing infrastructure documentation. Our facility has secure and clearly marked entrances, driveways, and parking areas, and is located close to public transport infrastructure. James_Morrisette, Founder and Board Member, has FL Certified General Contracting License#: CGC1505190, Mechanical Contracting License # CMC1249280, and Roofing Contracting License # CCC1330026 to expedite all facility construction to stay on schedule and within budget.

We have secured a significant portion of the commercial kitchen equipment, packaging, labeling, bottling, encapsulating and pill pressing automation lines including; encapsulator, capsule polisher, labeler system, stainless conveyors, induction heat sealer, coding and marking system, vacuum pumps, ozone generator, sifter, ribbon blender, VFFS (capsules), VFFS (powder), capsule counter, screw auger feeder, bucket elevator, metal detector (bottles), metal detector (bags), metal detector (encapsulator), vacuum conveyor/loader, conveyor belts, cone mixer, fork truck, milling machine, drum sifter, stainless steel sinks, stainless steel racks, stainless steel tables. We have secured all potable water sources and specific handwashing sinks as well as all infrastructure needed for our sanitation protocols including access to potable water sufficient for irrigation and hot water, as well as electrical service, a nearby easily accessible roadway, product transport and delivery vehicles, a diesel back-up generator, and odor mitigation systems including negative air pressure throughout the facility, as well as the use of devices such as ONA gel canisters to absorb any residual odors.

Our processing infrastructure is reasonably located to serve registered qualified patients statewide or regionally.

We have also secured staff to fill roles including Dr. Andrew Hall, Director of Manufacturing (“DOM”), Edgar Asebey, Chief Executive Officer (“CEO”), Sean Carriger, Chief Operating

Officer (“COO”) and Kara Lavaux, Chief Compliance Officer (“CCO”). Our staff have the knowledge and experience to process low-THC cannabis. 64-4.002. These individuals will create a set of procedures and protocols to begin our processing infrastructure and will lead the hiring and training of staff.

Processing Facilities, Systems, and Infrastructure—Not Yet Secured

We have identified, designed and plan to secured processing systems and infrastructure such as water reclamation systems, industrial dehumidifiers, extraction equipment such as CUP-30 cryo-ethanol closed-loop extraction systems, short path distillation equipment, concentration equipment, an –80 degree Chiller, freezers, enzyme-based bio-digester machine, analytical equipment, safety equipment, computer systems and software, ventilation and exhaust system, sanitation equipment, communication systems, seed-to-sale tracking and inventory systems, security systems (locking systems for ingress/egress, alarms, surveillance), and automated climate control systems and technology)

Plan for Securing Infrastructure

We plan to secure the remaining aspects of our processing equipment (CUP-30 Extraction equipment, short path distillation, roto-vap, analytical equipment, safety equipment, computer systems and software after license is issued. We have all our vendors identified, items quoted and adequate funding secured.

Timeline or Schedule for Securing Infrastructure

Within 120 calendar days of licensure, we will request processing authorization by submitting a completed “Request for Authorization” form via email to the Department. 64ER21-10(8). Since we will have the ability to begin processing marijuana upon requesting processing authorization,

we will have all facilities, systems, and infrastructure fully operational and integrated into our SOPs at that point.

Schedule Assumptions

Within 12 months of licensure, we will pass a Food Safety Good Manufacturing Practices inspection with a nationally accredited certifying body, in accordance with 381.986(8)(e)9., 64ER21-13(6). Based on the fact that Food Safety GMP inspections should be completed in operational facilities, we must be fully built out and ready for operations within 12 months of licensure.

We aim to receive Solvent-Based Extraction approval so that we can receive approval for Processing Authorization. Prior to engaging in Solvent-Based Extraction, we will submit a Request for Solvent-Based Extraction form DH8026-OMMU-08/2021 to the Department of Health and receive a written notice of approval from the OMMU that specifies the Solvent(s) we are authorized to use. Upon receipt of this completed form and the materials required by 64ER21-13(3), the OMMU will then inspect our processing facility. After completion of the inspection, the OMMU will send written notice either approving or denying our request to engage in Solvent-Based Extraction, or identifying any omissions, deficiencies, or violations.

Because third-party testing is costly and inefficient, we intend to integrate our own analytical equipment for internal QA/QC over time, purchasing equipment strategically based on results obtained from independent laboratories. As part of our two-year budget, the equipment we may purchase includes: ICP-MS for heavy metal analysis; HPLC for potency analysis; and GC-MS for residual solvent and pesticide analysis.

Before submitting our request for authorization, we will secure our inventory control system and enough workstations with computers and internet access to allow for updating the inventory

control system when processing of marijuana occurs. After securing licensure, we will hire support staff that will be trained according to our detailed written SOP's.

Timeframe for Obtaining Authorization

Pursuant to 381.986(8)(e), licensed MMTCs will cultivate, process, transport, and dispense marijuana for medical use. MMTCs are vertically integrated and are the only businesses in Florida authorized to dispense medical marijuana and low-THC cannabis to qualified patients and caregivers. According to MMTC Authorization Procedures, each MMTC must receive authorization at three stages prior to dispensing low-THC cannabis or medical marijuana: (1) cultivation authorization, (2) processing authorization, and (3) dispensing authorization. 64ER21-10.

We will first submit our request for cultivation authorization within 60 days post-licensure. 64ER21-10. Within 120 calendar days of licensure and after submitting our request for cultivation authorization, we will request processing authorization by submitting a completed "Request for Authorization" form via email. 64ER21-10(8). We will have the ability to begin processing marijuana upon requesting processing authorization. We will submit a separate request form for each facility for which we are requesting approval. Once the department receives our request for processing authorization, we anticipate an inspection of our processing facility and operations by the department within 14 business days to determine our compliance with 381.986, the Department's rules, and the representations made in our application on file with the Department. Within seven calendar days of the receipt of a written notice of omissions, deficiencies, or violations, as a result of the Department's inspection, we will provide a written corrective action plan that details the correction(s) to resolve the omissions, deficiencies, or violations identified in the written notice and the date the correction(s) were or will be completed. We will complete all

corrections within 20 calendar days of our receipt of the department's written notice identifying the omissions, deficiencies, or violations. 64-4.005(5).

We understand that an MMTC must request Cultivation Authorization within 60 days of licensure. No less than 30 calendar days prior to the initial cultivation of low-THC cannabis, we will notify the Department that we are ready to begin cultivation, that our cultivation facility and operations are compliant, and that we are seeking Cultivation Authorization. No low-THC cannabis plant source material may be present in any MMTC facility prior to Cultivation Authorization.

No less than 10 calendar days prior to the initial processing of low-THC cannabis, we will notify the Department that we are ready to begin processing, that our processing facility and operations are compliant, and that we are seeking Processing Authorization. No less than 10 calendar days prior to the initial dispensing of derivative product, we will notify the Department that we are ready to begin dispensing, that our dispensing facilities and operations are compliant with 381.986, and this chapter, and that we are seeking Dispensing Authorization. If the Department identifies a violation of 381.986, or this chapter during an inspection of our facility, we will notify the Department in writing, within 20 calendar days after the date of receipt of the written notice of violation, identifying the corrective action taken and the date of the correction.

Assumptions and Bases

Based on our highly qualified and experienced team, we will exceed the state's identified timeline for authorization and operations. Our CEO and COO have significant experience orchestrating operations for large teams, complex projects, and rigid schedules. Our DOM has successfully built out several processing operations, developed SOPs, chose, and purchased

equipment, designed floor plans, and hired and trained employees. Our CEO will oversee our startup timeline and ensure we stay on track.

To be operational for processing within 120 days of licensure, we have planned out a schedule for 16 weeks, which leaves a one-week buffer. Our schedule mainly includes permitting, engineering plans, and buildout; hiring and training of staff; purchase and installation of equipment; and development of SOPs. To be prepared in time, we will perform these activities concurrently and will begin preparations prior to licensure. The amount of infrastructure we have already secured will help us to meet or exceed the prescribed timeline.

SUBSECTION 4.6.1 – DISPENSING PLAN

Product Offering and Delivery Devices: Our plan for dispensing complies with section 381.986(8), F.S. and Department rules. Our facilities will dispense forms of marijuana suitable for medical use, including low-THC cannabis, medical cannabis, and cannabis delivery devices. 64-4.001(6); 381.986(8)(a)(1). All processed marijuana will be tested by a medical marijuana testing laboratory before it is dispensed. Section 381.986(8)(e)(11)(d). Product offerings will include flower; pre-rolled marijuana cigarettes; extracts (concentrates) available in various receptacles including vaporizer cartridges, cannabis syringes, jars, and/or child resistant bags; derivative products including edible derivative products; tinctures; inhalers; sprays; capsules; distillates; non-oral transmucosal products; topicals; and, transdermals. Delivery device offerings will include syringes, vaporizer batteries and chargers (to pair with cartridges), portable oil vaporizers, rolling papers, and pipes. Our pre-rolled cigarettes will not be wrapped with paper made with tobacco or hemp. 381.986(8)(e)(10). Edible product offerings will not contain more than 200 milligrams of THC, and a single serving portion of an edible will not exceed 10 milligrams of THC. 381.986(8)(e)(8). Edibles will have a potency variance of no greater than 15%. 381.986(8)(e)(8). Edibles will not be attractive to children; will not be manufactured in the shape of humans, cartoons, or animals; will not be manufactured in a form that bears any reasonable resemblance to products available for consumption as commercially available candy; and will not contain any color additives. 381.986(8)(e)(8).

Number of Proposed Facilities and Adequate Supply: Due to the vertical integration requirements of Florida's MMTCs, we believe many of the traditional obstacles to effective supply chain management will be inherently mitigated. We plan to initially open 3 dispensaries and to expand to 10 dispensaries within five years. In the first year, we will produce adequate supply for our 3

dispensaries. Due to our strategic expansion plan and significant increase in production, we will have ample supply for our increased dispensaries in year five. In year one, we plan to produce and dispense 1,879 pounds of cannabis to be processed into final cannabis products, and in year five, we plan to produce and dispense 10,536 pounds of marijuana and related marijuana products. Our leadership team, particularly our Robert Kruty, Director of Retail Operations, has the experience, knowledge, and logistical background across retail and business networks to effectively navigate the scope and scale of dispensing medical marijuana in compliance with all local and state regulations, and to manage multiple retail locations with a seamless and consistent brand and inventory. Cultivation and processing operations will be cohesive to guarantee dispensing facilities maintain appropriate inventory levels at all times. Orderly warehousing of finished product is a priority to facilitate timely delivery to dispensing facilities. We will develop market forecasting methodologies and contingency plans to stock the appropriate quantity of product per location, to streamline order fulfillment procedures from our central distribution center, and to track sales data to inform further product development and launches.

Hours of Operation: Our dispensaries will operate between 7 a.m. and 9 p.m., Monday through Sunday, unless restricted by a local ordinance. We will not dispense marijuana or any marijuana delivery devices from our premises between the hours of 9 p.m. and 7 a.m., but we may perform all other operations and deliver marijuana to qualified patients anytime. Section 381.986(8)(f)(4).

Delivery Methods: We will offer home delivery services through our transportation partner, Talaria Transportation, LLC. Our self-imposed home delivery radius is 50 miles from our dispensary facility. We will require all patients to appear in person at one of our dispensaries prior to being allowed to request deliveries. At the initial consultation, staff will scan and maintain an electronic record of the patient's or caregiver's Medical Marijuana Use Registry ("Registry") ID card and

government-issued photo identification. During initial consultations, staff will help patients and caregivers select products appropriate to medical conditions and individual circumstances. Upon completion of the initial consultation, the patient or caregiver may complete a delivery registration form. Forms will require identification and contact information, delivery address, best times for delivery, and type of location where delivery will occur (residential, commercial, etc.). Once the form is approved, the patient or caregiver will be able to request delivery by all Department-permitted means, or in person. Prior to filling any order, staff will check the Registry to make sure the delivery will not cause the patient to exceed their physician's recommendation. After reviewing an order, staff will use our seed-to-sale tracking system to generate a compliant transportation manifest. Section 381.986(8)(g)(1). Delivery staff will carry two copies of the manifest with every delivery and will carry separate manifests for each delivery recipient. When making a delivery, transporters will require patients and caregivers to provide valid Registry ID cards and government-issued photo ID. If the information matches the contents of the manifest, transporters will transfer the medical marijuana, then require the patient or caregiver to sign the manifest to acknowledge receipt of the delivery. We will keep the signed copy for our records. 381.986(8)(g)(1)(g)(I). Delivery staff will only deliver marijuana in person to registered patients and caregivers. Deliveries will never be left with a third-party, on a porch, or in a mailbox. Deliveries will only be made to the address provided on the delivery registration form. A team of two transporters will accompany every delivery, and one transporter will always remain in the vehicle during deliveries. 381.986(8)(g)(5). Both transporters will carry valid Florida driver's licenses and employee ID cards and will present both to law enforcement upon request. 381.986(8)(g)(4). We will provide transporters with training on driving safety and security, including defensive driving, accident reporting, situational awareness, and armed robbery

response. 381.986(8)(g)(6). We will only hire transporters who have had no major driving infractions in the past ten years and will require transporters to report any infractions they commit on- or off-duty. Medical marijuana will be stored in a separate secure storage area in the rear of the vehicles that will be locked and inaccessible during transport. 381.986(8)(g)(3). Our vehicles will be equipped with front and rear dashcams and internal cameras, observing the cab and secure storage area, as well as alarm systems to detect unauthorized access (though delivery staff will never store medical marijuana in an unmanned vehicle). A qualified mechanic will regularly inspect all vehicles and will conduct preventative maintenance and repairs as required. 381.986(8)(g)(2). We will maintain records of vehicle maintenance for at least three years.

Patient Education: We will educate patients on a wide range of marijuana related topics, such as safe use, legal use, safe storage, and accidental ingestion. Dr. Joseph Rosado, Medical Director and Marketing Director will oversee patient education content and materials, and our Director of Community Engagement will spread awareness through events and local connections. Our staff will help patients and caregivers select products appropriate to medical conditions and individual circumstances. At the time of purchase, patients and caregivers will be advised to heed the instructions and information accompanying the products to prevent accidental ingestion or misuse, including safe storage (keep in a secure location, out of reach of children and pets); indications and use; dosage and administration; ingredient lists for edibles; storage instructions for edibles; expiration dates for edibles; and, health information, including contraindications, warnings, and precautions. 64ER20-32; 381.986(8)(e)(12). Our staff will be primed on legal use guidelines to remind patients and caregivers that dispensed marijuana and marijuana devices may only be used by patients; to provide education on state guidelines regarding how designated caregiver(s) may assist with the patient's medical use of marijuana; to provide education on the illegality of

transferring medical marijuana to another person; to remind patients and caregivers that MMTCs are the sole source from which they may legally obtain marijuana; to remind patients that consumption of cannabis onsite is prohibited; and, to instruct them to keep all products in their original packaging while in transit. 381.986(6)(c); 381.986(8)(j); 381.986(8)(e)(11)(f)(VIII). Staff will answer all inquiries about medical marijuana and medical marijuana products to the best of their ability but will defer all condition-related questions to a qualified physician and avoid giving medical advice themselves. Our marketing and advertising will focus on patient education, including safe and legal use. None of our advertising will be visible to members of the public from any street, sidewalk, park, or other public place. 381.986(8)(h). The only exception will be a sign(s) affixed to the outside of our dispensary(ies), which will feature our name and logo. 381.986(8)(h)(1). Our trade name and logo will not contain any wording or images appealing to children, such as cartoon characters or similar images, and will be medically focused to avoid promoting recreational use of marijuana. 381.986(8)(h)(1); 381.986(8)(h)(2)(b). We will never use data from the Registry for soliciting patients or caregivers. Internet advertising and marketing will be directed toward adults, will be submitted to the Department for pre-approval, and will be placed on sites that can demonstrate a majority adult viewership. 381.986(8)(h)(2). None of our internet advertisements will be presented in the form of unsolicited pop-ups. 381.986(8)(h)(2)(c). Our website will require visitors to confirm that they are at least 18 years of age prior to entry. The website will feature product information, including: each marijuana and low-THC product available, including form, strain, CBD and THC content, dosages, and CBD to THC ratio; prices, including for a 30-, 50-, and 70-day supply; price for each delivery device; and, any discount policies and eligibility criteria for discounts. 381.986(8)(i). Through our website, visitors will be able to subscribe to our e-mail newsletter by providing their e-mail address and checking a box to

consent to receiving the newsletter. The newsletter will provide important updates, such as new product releases, advances in medical marijuana science, and legal/regulatory updates. Newsletter recipients will be able to cancel their subscription easily and permanently by clicking a cancellation link that will be included with every e-mail they receive. 381.986(8)(h)(2)(d).

Plan to Maintain Patient Confidentiality: We will operate a secure computer network that is compliant with the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and with patient confidentiality security protocols to track dispensing activity and uphold the integrity of protected health information (“PHI”). We will prevent hacking, tampering, or unauthorized entry to computers by standardizing the network’s use, restricting access privileges, and protecting all PHI with passwords. Computer network hardware will include desktop computers, laptops, printers, tablets, and other mobile devices. We will purchase sufficient computer hardware to equip each department with an active device and a backup. Desktop computers will connect to the internet via ethernet with firewall protection at the router (i.e., local area network (“LAN”)) and on every individual computer. Mobile devices and laptops will connect to the internet via Wi-Fi, protected by 119.071(3) security methods, the highest level of modern Wi-Fi security. Computer network software will include the POS system and the company’s ICS. The POS and ICS will be internet-based, so we will maintain 119.071(3) between network servers via an “https” platform. This security feature will restrict viewing/editing to authorized users. The network will have additional patient confidentiality security systems, such as multi-tiered password restrictions, and staff will follow protocols specific to protecting PHI on the network. Use or disclosure of PHI for purposes other than treatment, payment, or health care operations, unless permitted by the Privacy Rule (45 C.F.R. §160), will require written authorization from the patient permitting its use or disclosure. We created a standardized written

authorization form for patients that details any information to be disclosed or used, the person(s) disclosing and receiving the information, expiration date, and the right to revoke permission. We will establish confidentiality security protocols for staff to follow while using the company computer network to prevent improper disclosure of information. Workstation computers will feature password protection, automatic inactivity logout set at short intervals (e.g., 60 seconds) to prevent against unintended viewers, and user-access email notifications. Additional security protocols will prohibit most staff from downloading files from the web; taking company-owned devices home; and, transferring, removing, disposing, or unauthorized reuse of electronic media. Staff will also use privacy-protection best practices while operating the facility, such as never leaving documents that contain PHI uncovered on desks and using privacy screens on monitors. Any persons with access to the Registry will have successfully completed a Department-approved course in their responsibilities related to patient confidentiality. 64-4.009(3). Employees will not disclose personal and confidential information of the qualified patient. 381.986(10)(f)(4). Staff will ensure that patient records are not visible to anyone other than the qualified patient, his or her caregiver, and other authorized medical marijuana treatment center employees. 381.986(8)(e)(16)(h). Prior to any dispensing of medical marijuana, staff will share our policy about patient privacy with each patient and will convey this information in the form of patient agreement forms, which each patient will sign on their first visit.

Documenting and Investigating Patients' Complaints and Adverse Incidents: Immediately upon becoming aware of a patient complaint or report regarding an adverse incident, we will collect information regarding the product, including batch or lot number, date of purpose, and contact information from the person lodging the complaint, and we will immediately open an investigation into the incident. We will also immediately cooperate with the Department if the Department

receives a complaint or notice that one of our facilities has dispensed marijuana containing mold, bacteria, or other contaminant that may cause or has caused an adverse effect to human health or the environment. 381.986(10)(b). We will initiate a recall of any products that have a reasonable probability of causing adverse health consequences based on a bad patient reaction or other reason. 64-4.002(2)(d)(15). In the event of discovery or receipt of written notice from the Department that a recall is required, procedures shall include direct communication of the recall to all affected qualified patients and caregivers, and publication of a press release. The press release will be published in a publication of general circulation in the geographical area in which the recalled edibles were dispensed, and on our website. 64ER20-35(13).

Qualified Patient/Caregiver Profiles and Presentation of Registry Identification Cards: To ensure all qualified patients and caregivers have an active profile in the Registry and present valid Registry ID prior to purchasing marijuana, all individuals entering our dispensaries will be required to present their Registry ID along with valid government-issued ID to our Security Officers upon entry to our dispensing facilities. Our Security Officers will verify that the name and date of birth of the individual on the Registry ID matches the information on the government-issued ID, the photograph on the Registry ID matches the one on the government-issued ID, and both the government-issued ID and Registry ID are not expired. Before staff work with the patient or caregiver on product selection, the staff will check the unique numeric identifier on the Registry ID against the Registry to verify that the person presenting the card has an active profile. 381.986(7); 381.986(8)(e)(16)(d). If the Registry ID is found to be invalid, the individual will be immediately escorted off premises.

Tracking the Dispensation of Marijuana to Qualified Patients and Caregivers: Staff will check the Registry for each qualified patient and caregiver to verify the amount and type of marijuana

requested matches the physician certification in the Registry for that qualified patient, and the physician certification has not already been filled. 381.986(8)(e)(16)(d). If the limit has been reached, staff will not dispense marijuana to the patient or caregiver. Upon dispensing the marijuana or marijuana delivery device, staff will record the date, time, quantity, and form of marijuana dispensed in the Registry; the type of marijuana delivery device dispensed; and, the name and Registry ID number of the qualified patient or caregiver to whom the marijuana or marijuana delivery device was dispensed. 381.986(8)(e)(16)(g).

Compliant Dispensing of Usable Products and Delivery Devices: Kara Lavaux, Chief Compliance Officer will train staff on the legal requirements to dispense marijuana to qualified patients so that all usable products and marijuana delivery devices are dispensed in compliance with 381.986(8)(e)(16). 381.986(8)(e)(5). Training programs will address at least the Health Insurance Portability and Accountability Act (HIPAA); patient education; compliance; patient counseling; and data collection. 64-4.002(2)(a)(25). Tyler Doster, Directors of Cultivation and Processing will train staff on usable products, medical marijuana delivery devices, and safe administration techniques. Staff will navigate the Registry to find past purchase history and patient supply limits. Under no circumstances will staff dispense more than a 70-day supply to a qualified patient or caregiver within any 70-day period or dispense more than one 35-day supply of marijuana in a form for smoking within any 35-day period to a qualified patient or caregiver. 381.986(8)(e)(16)(b).

Dispensing Edibles Compliantly: Whenever we dispense edibles, we will comply with all relevant Department rules and regulations. 64ER20-35. To ensure that our MMTC's dispensing of edibles complies with the Department's Standards for Production of Edibles Rule, staff will verify that edibles are packaged correctly in child resistant packaging that is resealable such that it continues

to be child resistant after each use or serving; the package's integrity has been maintained; and, receptacles and wrappers are compliant in terms of packaging, labeling information, storage instructions, expiration date, warnings, and portioning. 64ER20-32(3)(a). Before dispensing any edibles, we will comply with the procedures listed in 64ER20-35(3), F.C.A. All our edibles will be one of the shapes listed in 64ER20-35(4), F.C.A. We will never produce edibles as listed in 64ER20-35(7), F.C.A. Our edibles will never contain any of the prohibited ingredients listed in 64ER20-35(8), F.C.A. We will only dispense edibles that have been approved by the Department and are packaged and labeled compliantly. 64ER20-35(2); 64ER20-35. All our edibles will be marked with the universal symbol as noted in 64ER20-35(9). Edibles will not be dispensed after the labeled expiration date. 64ER20-35(11)(b). Edibles on display will be contained in a secure, locked case, cabinet, or container. 64ER20-35(11)(c). We will not sell, offer, or dispense any other food or beverages to our customers, other than complimentary water. 64ER20-35(12). We will immediately institute recall procedures upon discovery or receipt of written notice that a recall is required.

SUBSECTION 4.6.2 – DISPENSING INFRASTRUCTURE

Our Proposed Dispensing Facilities

Our areas and infrastructure proposed for dispensing marijuana are sufficient to execute our dispensing plan. We plan to initially open 3 dispensaries and operate these locations for the first 2 years. The physical addresses of our first 3 secured dispensaries are 912 SE 46th Lane, Unit 101 and 543 NW 15th Terrace, Cape Coral, and 17218 Toledo Blade Blvd, Port Charlotte, Florida. We own 912 SE 46th Lane, Unit 101 and 543 NW 15th Terrace, Cape Coral and have a secured lease on 17218 Toledo Blade Blvd, Port Charlotte where the lessor is aware and has consented to leasing to a MMTC. Our dispensary floorplan in the addendum shows where dispensing activities will occur, including: (i) areas designated to protect patient privacy, including the provision of an appropriately sized waiting area and a private patient consultation room; and (ii) areas designated for retail sales.

Our facilities will always maintain compliance with local regulations regarding sanitation and waste disposal. 64-4.002(2)(c)(2). Furthermore, we have received zoning approval and will be able to demonstrate our ability to obtain it as required. 64-4.002(2)(c)(3). Our facilities will be located in counties and municipalities that allow MMTCs and will be housed in a physical facility allowed by the county or municipality. 381.986(11)(b)(1); 381.986(11)(b)(2). Facilities will not be located within 500 feet of the real property that comprises a public or private elementary school, middle school, or secondary school, unless the county or municipality approves the location through a formal proceeding open to the public at which the county or municipality determines that the location promotes the public health, safety, and general welfare of the community. 381.986(11)(c).

Our facilities will be equipped with sufficiently secure locking options for each means of ingress and egress; alarm systems that secure all entry points and perimeter windows and motion

detector and duress, panic, and hold-up alarms; video surveillance systems; secure storage areas, including secure storage areas for marijuana and usable product that is unfit for sale or consumption, including unused, returned, surplus, contaminated, recalled, and expired marijuana or usable product; and, climate and odor control. 381.986(8)(f); 64-4.207(1)(c); 64-4.207(3)(d)(3). Our facilities will have parking areas, security features, and access to water and sanitation systems. Our dispensing facilities will feature areas designed for retail sales and areas designed to protect patient privacy. Products on display in our dispensing facility will be contained in secure, locked cases, cabinets, or containers. Dispensing facilities will be equipped with methods of mitigating odors, if applicable. 64-4.002(2)(e)(8).

Accessibility of the Proposed Dispensing Facilities

Maximum safe access is a top priority in our dispensing operations. All patients who can benefit from the therapeutic benefits of medical marijuana should not have to travel far to access medicine, and they should feel safe coming to a dispensary to make a purchase. Our proposed dispensaries are on main roadways, not in high crime areas, and are centrally located in populated areas. The proposed locations are also in close proximity to patient populations and near public transportation, making access simple for prospective patients and caregivers. While we value accessibility and centrality, we have also taken care to choose locations that blend well with the surrounding communities, without being intrusive or inappropriate for the locations. Dispensing facilities will be centrally located to several populated areas and located on a main roadway. 64-4.002(2)(c)(11)(a). Dispensaries will be proximal to patient populations. 64-4.002(2)(c)(11)(b). Dispensaries will have accessible features to make mobility as easy as possible for all patients. Additionally, we will deliver to patients who request this service.

Computer Network Systems

All facilities will utilize a HIPAA compliant computer network and will be equipped with communication systems. 64-4.002(2)(e)(4); 64-4.002(2)(e)(6). We will operate a secure computer network that is compliant with the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and with patient confidentiality security protocols to track dispensing activity and uphold the integrity of protected health information (“PHI”). We will prevent hacking, tampering, or unauthorized entry to computers by standardizing the network’s use, restricting access privileges, and protecting all PHI with passwords. Computer network hardware will include desktop computers, laptops, printers, tablets, and other mobile devices. We will purchase sufficient computer hardware to equip each department with an active device and a backup. Desktop computers will connect to the internet via ethernet with firewall protection at the router (i.e., local area network (“LAN”)) and on every individual computer. Mobile devices and laptops will connect to the internet via Wi-Fi, protected by 119.071(3) security methods, the highest level of modern Wi-Fi security.

Computer network software will include the point of sales (“POS”) system and the company’s inventory control system (“ICS”). The POS and ICS will be internet-based, so we will maintain 119.071(3) between network servers via an “https” platform. This security feature will restrict viewing/editing to a limited number of authorized users. The network will have additional patient confidentiality security systems, such as multi-tiered password restrictions, and staff will follow protocols specific to protecting PHI on the network. Staff will use the network to check patients in, fulfill orders for delivery, and access the state’s Registry. By linking with the Registry, the POS system will display purchase limits for each patient and restrict patients from over-purchasing medical marijuana.

Use or disclosure of PHI for purposes other than treatment, payment, or health care operations, unless permitted by the Privacy (45 C.F.R. §160), will require written authorization from the patient permitting its use or disclosure. We created a standardized written authorization form for patients that details any information to be disclosed or used, the person(s) disclosing and receiving the information, expiration date, and the right to revoke permission.

Any persons with access to the Registry will have successfully completed a department-approved course in their responsibilities related to patient confidentiality. 64-4.009(3). Employees will not disclose personal and confidential information of the qualified patient. 381.986(10)(f)(4). Staff will ensure that patient records are not visible to anyone other than the qualified patient, their caregiver, and other authorized medical marijuana treatment center employees. 381.986(8)(e)(16)(h).

Workstation computers will feature password protection, automatic inactivity logout set at short intervals **119.071(3)** to prevent unintended viewers, and user-access email notifications. Users who fail to correctly enter their password three consecutive times will be locked out until a supervising staff member reauthorizes user access. Additional security protocols will prohibit most staff from downloading files from the web; taking company-owned devices home; and, transferring, removing, disposing, or unauthorized reuse of electronic media. Staff will also use privacy-protection best practices while operating the facility, such as never leaving documents that contain PHI uncovered on desks and preventing patients from viewing workstation computer screens by using privacy screens on monitors. Prior to any dispensing of medical marijuana, staff will share Applicant's policy about patient privacy with each patient. Staff will convey this information in the form of patient agreement forms, which each patient will sign on their first visit.

Vehicles for Transporting Marijuana

Our transportation partner, Talaria Transportation, LLC will be using **119.071(3)**

119.071(3) (or similar) from a professional **119.071(3)** Qualified Vehicle Modifier to transport medical marijuana. 64-4.002(2)(e)(5). To ensure the safe transport of marijuana and marijuana delivery devices, we will maintain a marijuana transportation manifest in any vehicle transporting marijuana. 381.986(8)(g)(1). The marijuana transportation manifest will be generated from our seed-to-sale tracking system and will include the list provided in 381.986(8)(g)(1)(a)-(g). Furthermore, each vehicle will be equipped with a secure separate fully enclosed box, container, or cage that is secured to the inside of the vehicle used for transport, where no portion of the enclosed box, container, or cage shall be comprised of any part of the body of the vehicle. The box, container, or cage will be locked and inaccessible during transport. 381.986(8)(g)(3). We will equip vehicles with front and rear dashcams and internal cameras, observing the cab and secure storage area, as well as alarm systems to detect unauthorized access (though delivery staff will never store medical marijuana in an unmanned vehicle). Talaria employs qualified mechanics who will regularly inspect all vehicles and will conduct preventative maintenance and repairs as required. They will maintain records of all vehicle maintenance for at least three years. Only vehicles that are in good working order will be used to transport marijuana. 381.986(8)(g)(2). Systems for Communicating with Persons Transporting Marijuana

Talaria will exclusively use company phones to communicate with delivery staff transporting marijuana via call and text. 64-4.002(2)(e)(6). A team of two employees will accompany every delivery, and one person will always remain in the vehicle during deliveries. 381.986(8)(g)(5). While both the driver and passenger members of the team will be equipped with company cell

phones that must be fully charged before undertaking deliveries, solely the passenger member of the team will be permitted to take and respond to company calls and text during transit. The person exiting the vehicle to deliver marijuana is required to carry a cell phone, in case of emergency. All Talaria employees performing transportation will receive specific safety and security training before performing any transportation activities. 381.986(8)(g)(6). Transportation vehicles will be equipped with a Global Positioning System (“GPS”) to facilitate navigation and provide tracking information to the Department and our company management. The GPS will provide data to law enforcement and regulators in the event of an in-transit loss, emergency, or any criminal activity transportation team members may experience while on the road. The GPS will allow management and the Department to track the location of transport vehicles in real time during transportation. Talaria will maintain historic GPS data for no less than twelve (12) months from the date of creation and will allow the Department to search all real-time and archived data upon request. Talaria’s GPS software will also serve to deliver reports to our company regarding driver habits. Management will review these reports frequently to guarantee Talaria’s employees are driving with the safest habits.

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SUBSECTION 4.6.3 – ABILITY TO SECURE DISPENSING INFRASTRUCTURE

Dispensing Facilities, Systems, and Infrastructure—Secured

We have secured our dispensing facilities and have submitted herein floor plans, security overlays, property, building, lease (property owner consent) purchase information and documentation, as well as all letters of intent, zoning approval, municipal approval, warranty deeds of properties, operating agreements, certificates of formation, and other supporting dispensing infrastructure documentation. Our facility has secure and clearly marked entrances, driveways, and parking areas, and is located close to public transport infrastructure. We have secured the following dispensary locations: 912 SE 46th Lane, Unit 101 in Cape Coral as our primary dispensary, as well as 543 NW 15th Terrace, also in Cape Coral, and 17218 Toledo Blade Blvd, 5, 6, in Port Charlotte.

Dispensing infrastructure, as well as other infrastructure required, will be secured through the financial commitments made by Chicago Atlantic Group, LLC and (SPAC). Collectively these two financing sources have pledged up to \$30 million dollars and applicant currently has \$2.4 million dollars cash on hand available for operationalizing post-licensing award.

Upon licensure, James Morrisette, Founder and Board Member has FL Certified General Contracting License # CGC1505190, Mechanical Contracting License # CMC1249280, and Roofing Contracting License # CCC1330026 will be utilized to expedite all facility construction to stay on schedule and within budget.

Dispensing Facilities, Systems, and Infrastructure—Not Yet Secured

The dispensing facilities, systems, and infrastructure we have not yet secured, but intend to secure upon licensure include the following dispensaries if available at that time; 12251 ITEC Park Dr., Fort Myers and 12951 Metro Pkwy, Fort Myers.

Upon licensure, we will secure dispensing systems such as POS terminals, 119.071(3) POS and inventory software program, secure display cases and cabinets, analytical equipment, safety equipment, computer systems and software, ventilation and exhaust systems powered by fully automated environmental controls, sanitation equipment, communication systems (in-house and for delivery), and comprehensive security systems (locking systems for ingress/egress, alarms, surveillance).

Upon licensure, we will secured all potable water sources and specific handwashing sinks as well as all infrastructure needed for our sanitation protocols including access to potable water sufficient for irrigation and hot water, as well as electrical service, a nearby easily accessible roadway, a diesel back-up generator, and odor mitigation systems including negative air pressure throughout the facility, as well as the use of devices such as ONA gel canisters to absorb any residual odors.

Timeline or Schedule for Securing Infrastructure

Within 180 calendar days of licensure, we will request dispensing authorization by submitting a completed “Request for Authorization” form to OMMULicenseOperation@flhealth.gov. We will have the ability to dispense marijuana upon requesting dispensing authorization, and we will submit a separate request form for each facility for which we are requesting approval. 64ER21-10(9), F.C.A. We will anticipate that our proposed dispensing facilities and operations will be inspected by the department within 14 business days upon receipt of our requests for dispensing authorizations. 64ER21-10(9)(a), F.C.A. We will not begin dispensing marijuana or marijuana delivery devices at any of our facilities until we have received written notice of dispensing authorization from the Department. 64ER21-10(3), F.C.A.; 64ER21-10(9)(b), F.C.A.

Assumptions Upon which the Infrastructure Schedule is Based

Within 180 calendar days of licensure, we will request dispensing authorization. Since we will have the ability to begin dispensing marijuana upon requesting dispensing authorization, we will have all facilities, systems, and infrastructure fully operational and integrated into our SOPs at that point. Our dispensing authorization timeframe assumptions are also contingent upon receiving authorization to cultivate and authorization to process, which are both prerequisites for dispensing authorization. 64ER21-10, F.C.A.

Timeframe for Obtaining Authorization

Pursuant to 381.986(8)(e), licensed MMTCs will cultivate, process, transport, and dispense marijuana for medical use. MMTCs are vertically integrated and are the only businesses in Florida authorized to dispense medical marijuana and low-THC cannabis to qualified patients and caregivers. According to MMTC Authorization Procedures, each MMTC must receive authorization at three stages prior to dispensing low-THC cannabis or medical marijuana: (1) cultivation authorization, (2) processing authorization, and (3) dispensing authorization. 64ER21-10.

We will first submit our request for cultivation authorization within 60 days post-licensure. 64ER21-10(7). Within 120 calendar days of licensure and after submitting our request for cultivation authorization, we will request processing authorization by submitting a completed “Request for Authorization” form via email. 64ER21-10(8). We will have the ability to begin processing marijuana upon requesting processing authorization. We will submit a separate request form for each facility for which we are requesting approval. Once the department receives our request for processing authorization, we will anticipate an inspection of our processing facility and operations by the department within 14 business days to determine our compliance with section 381.986, the department’s rules, and the representations made in our application on file with the

department. Within seven calendar days of the receipt of a written notice of omissions, deficiencies, or violations, as a result of the department's inspection, we will provide a written corrective action plan that details the correction(s) to resolve the omissions, deficiencies, or violations identified in the written notice and the date the correction(s) were or will be completed. We will complete all corrections within 30 calendar days of our receipt of the Department's written notice identifying the omissions, deficiencies, or violations.

An MMTC must request Cultivation Authorization within 60 days of licensure. No less than 30 calendar days prior to the initial cultivation of low-THC cannabis, the MMTC will notify the Department that the MMTC is ready to begin cultivation, is in full compliance with all rules and regulations, and is seeking Cultivation Authorization. No low-THC cannabis plant source material may be present in any MMTC facility prior to Cultivation Authorization.

No less than 10 calendar days prior to the initial processing of low-THC cannabis, the MMTC will notify the Department that it is ready to begin processing, is in full compliance with all rules and regulations, and is seeking Processing Authorization. No less than 10 calendar days prior to the initial dispensing of Derivative Product, our MMTC will notify the Department that it is ready to begin dispensing, is in full compliance with 381.986 and this chapter, and is seeking Dispensing Authorization. If the Department identifies a violation of 381.986, or this chapter during an inspection of an MMTC facility, the MMTC will notify the department in writing, within 20 calendar days after the date of receipt of the written notice of violation, identifying the corrective action taken and the date of the correction.

Assumptions and Bases

Based on our highly qualified and experienced team, we assume we will meet or exceed the state's identified timeline for authorization and operations. Edgar Asebey, CEO and Sean Carriger,

COO have significant experience efficiently rolling out operations for large teams, complex projects, and rigid schedules. Robert Kruty, Director of Retail Operations has successfully built out several dispensary operations, developed SOPs, chose and purchased equipment, designed floor plans, and hired and trained employees. Our CEO will oversee our startup timeline to ensure we stay on track.

To be operational within 180 days of licensure, we planned out a schedule for 24 weeks, which leaves a buffer of over a week. Our schedule includes permitting, engineering plans, and buildout; hiring and training of staff; purchase and installation of equipment; and development of SOPs. To be prepared in time, we will perform these activities concurrently and will need to begin preparations prior to licensure. The amount of infrastructure we have already secured and the team we have already built will help us to meet or exceed the prescribed timeline.

SUBSECTION 4.7.1 – PREMISES SECURITY

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SUBSECTION 4.7.2 – IT SECURITY

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SUBSECTION 4.7.3 – DIVERSION, UNLAWFUL ACCESS, AND TRANSPORTATION

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Vehicle Tracking Systems and Use of Transportation Manifests

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Vehicle Maintenance Plans

To protect our employees and the products they transport, our vehicles will be kept in excellent working order. 381.986(8)(g)(2). This will entail regularly having the vehicles inspected for mechanical issues, addressing these issues when discovered, and regularly conducting maintenance including oil changes and tire rotations. Alongside technical maintenance inspections, we will participate in safety inspections of the vehicles, checking features including the alarm system, the locks on the vehicle and the product lockbox, the seatbelts, and airbags. The frequency of these inspections, the issues they uncover, and the actions taken to address them will be recorded and these records will be retained within our facility. Additionally, we will comply and fully cooperate with any Department inspection of our premises or vehicles. 64-4.202(1).

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), F.C.A.; 64-4.208(2)(a), F.C.A.; 435.05(c); 381.986(9), ; 381.986(8)(e)(5), ; 64-4.002(2)(d)(10), F.C.A. These screenings will require all individuals to submit a full set of fingerprints to the Department, or a vendor, entity, or agency authorized by Section 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 each individual's background screening no later than six months after they submit their fingerprint scan. 64-4.208(2)(b)-(d), F.C.A.; 381.986(9)(a). 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)(f), F.C.A. Additionally, we will comply with all additional information requests from the department to complete the background screening. 64-4.208(2)(e), F.C.A. We 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), F.C.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), F.C.A.

In the event an employee, owner, or manager is arrested in connection with any disqualifying offenses in 435.04, 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), F.C.A. This report will include: the name of the arrested individual, their position or job title, and a copy of the arrest report. 64-4.208(3)(b), F.C.A. 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. 64-4.208(4)(b), F.C.A.

Employee Training

We have produced standard operating procedures outlining comprehensive employee training programs. 64-4.002(2)(a)(25), F.C.A. All employees will be trained in, and have access to, our alcohol and drug-free workplace policy. 381.986(8)(f)(9). Additionally, all employees will be trained on the legal requirements to dispense marijuana to qualified patients. 381.986(8)(e)(5). 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 and prohibit sales to unauthorized individuals, as well as the proper tracking and documentation of all medical marijuana transactions.

Furthermore, to maintain a safe working environment, our employees will be trained in proper conflict resolution as well as handling violent incidents and other emergencies. Clint, Wynne, Director of Security will train employees on conflict resolution, violent incidents, and other emergencies before beginning work at our facility, and annually thereafter. All employees will complete training on the types of emergencies that may occur in the facility and the proper response procedures for each emergency. 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 also conduct retraining 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.

If we use solvent-based extraction, before performing any such extraction, we will train involved employees in SOPs and the safe use of our closed loop system. We will maintain documentation of these trainings and submit them to the Department. 64ER21-13(3)(d), F.C.A.; 64ER21-13(11)(a)(1)-(2), F.C.A. We will also prominently display a list of all of the names of trained and certified employees outside the solvent-based extraction area. 64ER21-13(11)(b), F.C.A. We will abide by OSHA standards and have staff on the premises certified in OSHA 10 training which allows for the prevention, avoidance and reduction of safety and health hazards in the workplace. 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), F.C.A. We want our employees to be compassionate and knowledgeable, therefore our trainings will emphasize treating fellow employees with respect and kindness.

SUBSECTION 4.7.5 – RECALLS

Our team has considerable experience with the full scope of recall procedures, particularly our Director of Compliance, Kara Lavaux has 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 fail 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.

Finally, we will contract with a licensed laboratory to perform audits on our SOPs, testing records, and samples, and we will provide the results of these audits to the Department to confirm that the marijuana or low-THC cannabis is compliant and safe for human consumption.

381.986(8)(e)(11)(d).

SUBSECTION 4.8.1 – EXPERIENCE IN THE MARIJUANA INDUSTRY

Introduction

We have assembled a team with significant experience in the marijuana industry where it relates to cultivation, processing, dispensing, and securing, and researching marijuana.

Chief Executive Officer

Edgar J. Asebey is a founding partner of Keller Asebey Life Science Law PLLC and has been practicing FDA regulatory and transactional law for over 20 years. Since 2015, he has been advising cannabis companies and today provides regulatory compliance, due diligence and transactional services to hemp/CBD, cannabis/marijuana and psychedelic drug discovery companies. In addition to his law practice, Mr. Asebey is a founding member of Iter Investments Fund I GP, a venture capital firm focused on supporting emerging psychedelic drug discovery companies. Most recently, Mr. Asebey co-authored the authoritative treatise, *Legal Guide to the Business of Marijuana* (PLI Press, 2021) and is considered an expert in the regulation of Cannabis, hemp, hemp-derived cannabinoids and psychedelics. He founded and served as president of Andes Pharmaceuticals, Inc., a natural products drug discovery company, from 1994 to 2001 and has served as in-house counsel to two life sciences companies. Most recently he was an equity partner in the Health Care & Life Sciences Practice Group at Jones Day and today serves as partner at Keller Asebey Life Science Law, PLLC.

Chief Operating Officer

Sean Carriger is an experienced owner, operator, executive & consultant of vertically integrated cannabis businesses in 8 states and 3 other countries. He founded a hemp/cannabis tissue culture venture focused on developing a diverse clean stock cultivar portfolio and has served as the lead design / build consultant on 2.4million square feet of licensed cannabis cultivation and production

facilities. In his capacity, Carriger has presented to the Belizean Senate, House of Representatives and the Deputy Prime Minister on Cannabis & Hemp policies, industry standards and best practices. He has written twenty winning applications in merit-based marijuana licensing efforts and has written standard operating procedures earning cGMP & GAP certification in multiple cultivation and manufacturing facilities. Carriger is actively involved at Truman State University assisting with developing a new 4yr cannabis degree curriculum, and is the current President of Agri-Genesis, leading vertically integrated marijuana start-ups through design and build out to final approval of 9 licensed facilities. He has been nominated for eight “Best Of” awards in 2022 including best Cultivator, Best Cultivar, and Best Dispensary. As Founder and Chief Operating Officer at Craiger Enterprises, Carriger has focused on research and development of cannabis and hemp genetics. He holds an MBA from the University of Houston, Clearlake.

Chief Financial Officer

Robert Velarde is an experienced investment management professional with over 25 years of expertise in private equity and venture capital fundraising, investment and portfolio management, and investor relations. Robert's extensive experience and successful track record make him a valuable asset in the cannabis industry, where he brings his expertise in private equity and venture capital to help build and manage successful cannabis-related companies. He holds an MBA from Harvard University.

Chief Compliance Officer

As one of the first marijuana regulators in the country when she worked for the City of Denver, Kara Lavaux has built a considerable knowledge base in cannabis food safety and consumer safety. In her current role as a consultant for Allay Consulting, she assists and supports cannabis businesses with their compliance needs, such as helping them adopt and implement GMPs into

their operation. She also works as an adjunct instructor at the Community College of Denver in their new Cannabis Business degree program.

Director of Cultivation

Tyler Doster has over a decade of cannabis related experience, having first entered the cannabis industry working under the Oregon Medical Marijuana Act in 2009 where he built, designed, and operated marijuana cultivation facilities for over 96 patients across four different regions of the state. Doster worked in this capacity until 2017 when he became the Director of Cultivation for Headrush Hill until 2021. During this time, Doster was awarded first and second place Terp Cup wins for his Han Solo Burger and Hash Burger, both of which were recognized for their terpene percentages. Tyler currently serves as the Director of Cultivation for Byrn Brands, licensed under Gold Leaf Florida. He has genetics across the United States, specializing in 30%+ THC cultivars which have released over 200 individual strains. This is done in addition to his marijuana cultivation consulting which has taken place across multiple states including Oregon, Washington, Oklahoma, California, and Florida. Doster is Green Clean certified since 2016, has implemented standard cultivation procedures across multiple commercial operations, and has technical proficiencies in Business Central, Leafly, and Metrc.

Director of Manufacturing

Andrew Hall is a Senior Level Scientific Officer and Director with a focus on pharmacognosy, drug development, and natural products. Hall has experience in pharmaceuticals, natural products chemistry, analytical chemistry, and formulation with multiple startups. He is a multifaceted scientist and industry executive with expertise in drug discovery, method development, accreditation licensing, product development, validations, GMP manufacturing, FDA compliance in 21CFR (Part 211 +8020), product commercialization, and additional regulatory compliance.

Hall is a mental health advocate passionately focused on the standardization in cultivation, extraction and testing of medicinal plants and marine invertebrates. Working currently at Novo Dx as the VP IVD In-vitro Diagnostics, Hall also has previous experience as the VP R&D and product Development at Verano. In this role, he served as a key member of the executive leadership team accountable for spearheading all relevant projects and initiatives with additional responsibility for product development and commercialization for a multistate cannabis operation. Hall led Verano's corporate initiatives of innovation and R&D, managing a national team and administering a \$5 million budget.

Medical Director

Dr. Joseph Rosado is a well-known medical marijuana expert who not only has over two decades of relevant professional medical experience, but also over five years of experience in the marijuana space. He has been a Medical Cannabis Certifying Physician through DocMJ in Orlando, Florida since 2021. He is the Owner and Chief Executive Officer ("CEO") of International Medical Consultants, Inc. which was formed in 2018. Here, Rosado provides medical cannabis consulting services to physicians and patients internationally. We have written about Dr. Rosado extensively in sections 4.9.1 and 4.9.2.

Chief Scientific Officer (Advisory)

Dr. Ethan Russo is a renowned cannabis scientist made famous for his work with cannabis molecules, particularly THC, CBD, and the interactions between these compounds and terpenes and terpenoids found in cannabis. Also a prominent speaker, educator, neurologist, and Medical Doctor, Dr. Russo advises cannabis companies worldwide. He will help guide the company's product research initiatives through a collaboration with his research company, CReDO-Sciences, looking for new compounds, product formulations and potential medicinal benefits to patients.

Director of Dispensary

Robert Kruty III entered the cannabis space in 2018 with his role as a Regional Manager at MedMen where he helped open the first flagship location in West Palm Beach, Florida, which ultimately exceeded sales plans and ADS expectations through its first fiscal year of operations. From 2020-2022, Kruty worked as a Regional Manager for Curaleaf where he was responsible for business execution, operational excellence, and patient experience in 16 stores across Florida. In this role he improved regions' average ticket performance from \$90 in 2019 to \$98 in 2020 and \$105 in 2021 with an emphasis on people selection and development. Kruty also recruited and hired eight store managers in a four-month period that rebuilt the existing market and drove profitability by \$2 million in same time frame. In his current role as a Regional Manager at Cresco Labs, Kruty has been responsible for business execution, operational excellence, and patient experience in ten Florida-based stores. He has recruited, hired and trained six store managers for new and existing stores throughout the organization and recruited ten assistant roles. Through his retail experience, Kruty has experienced firsthand ample dispensing logistics, management, and hiring.

Director of Tissue Culture

Cecilia Zapata, Ph.D is a highly experienced plant scientist who has spent more than two decades working in the plant tissue culture industry with her cannabis experience going back to 2017. She is an expert in plant propagation and has specialized in developing and managing tissue culture labs and greenhouses for the commercial production of plants. She currently works as the Director of Tissue Culture at Trulieve in Quincy, Florida, where she is responsible for establishing a commercial tissue culture lab in Trulieve. Her target is 15-20,000 TC plants weekly of mother stock of marijuana.

SUBSECTION 4.8.2 – OTHER RELEVANT EXPERIENCE

Introduction

We have assembled a team not only with ample experience in the marijuana industry, but also relevant experience across multiple other industries which can aid in opening and operating our marijuana facility.

Chief Executive Officer

Edgar J. Asebey is a founding partner of Keller Asebey Life Science Law PLLC and has been practicing FDA regulatory and transactional law for over 20 years. Asebey advises clients in the pharmaceutical, biotech, biologics, med device, food & dietary supplement industries and represents clients before the FDA, USDA, CBP, FTC and EPA. He counsels clients and performs regulatory due diligence in support of financing, public offerings and M&A transactions. He also advises emerging life science companies on patent portfolio development, pharmacoeconomics, and clinical trial development. Early in his career Mr. Asebey served as Patent and Licensing Advisor to the Natural Products Branch of the National Cancer Institute at the National Institutes of Health (NIH). Most recently he was an equity partner in the Health Care & Life Sciences Practice Group at Jones Day and today serves as partner at Keller Asebey Life Science Law, PLLC. He is a founding member and FDA Regulatory and IP Advisor at Iter Investments, a psychedelics venture capital fund. Asebey studied molecular biology at the University of Chicago and spent 5 years working in molecular biology research laboratories at The University of Chicago and the University of Illinois School of Medicine. He holds a law degree from Catholic University of America (Washington, D.C.) and is licensed to practice law in Florida and Washington, D.C. He is a member of the American Bar Association, Food & Drug Law Institute (FDLI), Dade County Bar Association, and BioFlorida.

Chief Operating Officer

Sean Carriger has an extensive background serving in multiple managerial and executive leadership roles at business as varied as BP (Contracts Specialist and Completions Manager) and Chevron (Health and Safety Associate) to Mana Holdings (Founder and Chief Executive Officer), Show Me Alternatives (Chief Operating Officer), and Craiger Enterprises (Founder and Chief Operating Officer). He has over 15 years of experience in regulatory compliance, security, SOP development and implementation, KPI development and tracking, along with value engineering and ROI analysis, revenue and growth management, and communication. He has ample technological and software experience with METRC, Dutchie, LeafLogix, and LeafLink.

Chief Financial Officer

Robert Velarde has proven experience in building private markets investment platforms and is a senior leader in institutional and family office investment firms. In 2020, Robert co-founded Iter Investments, a global venture capital firm that focuses on investing in early-stage companies across multiple sectors of the psychedelics industry, with a particular emphasis on addressing the underserved mental and behavioral health sectors. Prior to that, Robert worked as a Senior Managing Director at Small Enterprise Assistance Funds (“SEAF”), a global impact investment firm. As a member of the Senior Executive Team, he was responsible for the overall strategic direction and operational management of the firm. He was also the Regional Head of Latin America and the Caribbean, where he managed fund operations and the regional investment team. Robert also has extensive fundraising experience as a general partner and member of several private equity and venture capital funds.

Chief Compliance Officer

Kara Lavaux has an Environmental Health degree from Colorado State University and worked in Colorado health departments for 14 years before making the transition to private industry as a compliance consultant. Her experience is in food safety, public health, and cannabis. She holds credentials as a Certified Professional in Food Safety from the National Environmental Health Association and as a Certified Quality Auditor from the American Society of Quality.

Director of Cultivation

Tyler Doster has not only extensive marijuana related experience, but also ample expertise in healthcare and legal compliance. While working for over a decade in the marijuana space across multiple states, Doster has also worked directly with nearly 100 medical patients in Oregon as part of the state's Medical Marijuana Act. His legal consultation has extended to multiple states including Oregon, Washington, Oklahoma, California, and Florida. Doster has also served as a writer for extensive SOPs taking into mind state and local regulations, ethics and compliance, and medicinal benefits along with safety standards.

Director of Manufacturing

Andrew Hall possesses an exceptional understanding of economics and strong business and economics acumen. He has worked with venture capital and private equity firms in raising funds and improving due diligence. He possesses a sound foundation of ethics and integrity for objectivity and transparency to ensure compliance, as well as commercial and product development outcomes. Since 2022, he has been a key member of the executive leadership team leading all research and development at Novo DX, serving as the VP IVD In-Vitro Diagnostics. In this role, he has led all research and development, FDA and Health Canada communications and 510,00 submissions for regulatory, quality assurance, quality control, tech transfers/asset

acquisition, point of care, and OTC in-vitro diagnostic medical devices development and manufacturing companies. Hall has a PhD in Chemistry from Florida Atlantic University.

Medical Director

Dr. Joseph Rosado received his Doctor of Medicine from the Universidad Central del Este – UCE in 2001 and his Master of Business Administration from the University of Phoenix in 2005. Upon completing his medical training, Rosado worked as a physician, clinic and hospital doctor, and as the Director of the Communicable Disease Division/ Epidemiology and Immunization Departments at St. John’s County Health. Currently, Rosado is an Adjunct Professor at Lake Erie College of Osteopathic Medicine, and the Medical Director and Provider at Panacea Alliance and Complete Wellness Medical Centers of DeLand. He is also the CEO and Owner of International Medical Consultants and is on the Scientific Board of Advisors for Medical Extractos.

Chief Scientific Officer (Advisory)

Dr. Ethan Russo is a renowned cannabis scientist made famous for his work with cannabis molecules, particularly THC, CBD, and the interactions between these compounds and terpenes and terpenoids found in cannabis. A prominent speaker, educator, and neurologist, Dr. Russo advises cannabis companies worldwide. He will help guide the company’s product research initiatives through a collaboration with his research company, CReDO-Sciences, looking for new compounds, product formulations and potential medicinal benefits to patients.

Director of Dispensary

Robert Kruty III has over a decade of experience in the retail space which includes district-wide managerial roles at Abercrombie & Fitch, Tilly’s, and Hot Topic Box Lunch prior to his entrance into the cannabis industry. Having obtained a Bachelor of Fine Art in Illustration from Columbus College of Art and Design, Kruty went on to spend nearly three and a half years at Abercrombie

& Fitch where he was responsible for recruiting and hiring efforts specifically for the company's Manager in Training program. He oversaw all operational and business tasks of five stores, including the eighth highest grossing district at \$40 million sales annually. He was nominated for and awarded the Diversity Champion award. Kruty went on to spend four years at Tilly's where he successfully opened five new stores in 2013 alone in Texas and South Florida. He hired and oversaw the development of 30 full-time managers. He was selected as "Tilly's Choice," a top performing district manager by region distinction, for 2016. From 2016 to 2018, Kruty worked at Hop Topic Box Lunch, overseeing operations for 14 stores and accounting for \$36 million in annual sales; the highest grossing district on the East Coast.

Director of Tissue Culture

Dr. Cecilia Zapata has worked at numerous prestigious organizations throughout her career, starting with Syngenta Flowers, where she served as a Plant Scientist I from 2000 to 2009. During her tenure at Syngenta Flowers, she managed a plant tissue culture laboratory and greenhouse for the production of ornamental certified stocks. She was also responsible for training and managing personnel, budget management, and the development of tissue culture protocols for ornamental plant micropropagation. From 2012 to 2016, Cecilia worked at Driscoll's as a Lab Manager for Breeding Germplasm, where she managed the production of breeding and commercial strawberries, raspberries, blackberries, and blueberries certified stocks. In her role, she was responsible for recruiting, training, and managing more than 50 people across different locations. Most recently, she has worked at Trulieve in Quincy, Florida as the Director of Tissue Culture where she has been responsible for establishing a commercial tissue culture along with hiring and training all lab and clean stock support personnel. She received her PhD in Plant Physiology from Texas A&M University in 1997.

4.8.3 Business Plan - Plan to Become Operational

Upon licensure by the Florida DOH/OMMU (“the Department”), we will implement our plans to become a fully operational MMTC. 381.986(8)(e). Due to the vertical integration requirements of Florida’s MMTCs, we believe that many of the traditional obstacles to effective supply chain management will be mitigated. By being our own medical marijuana supplier, we will maximize the amount of cannabis produced, while maintaining excellent standards of quality. To achieve these goals, we have assembled a team of patently experienced leaders, subject matter experts, and cannabis industry professionals to guide our business startup to success.

Finances

Financing commitments for this business total \$32.4 million. We have \$2.4 in funds currently available to begin our MMTC business. Upon licensure we will finalize credit facilities for up to \$30 Million from the Chicago Atlantic Group, LLC (\$15M), a well-known cannabis investment fund that has deployed over \$1.8 Billion into the cannabis sector, and the Stigma Fund I, an Oklahoma-based SPAC specialized in cannabis-sector investments. Within ten (10) days of licensure, we will post a \$5 million performance bond issued by a top rated and nationally recognized surety insurance company. 381.986(8)(b)(7)(a). 64ER22-1(2)(3)(a-c). Alternatively, we may choose to provide cash or an irrevocable letter of credit directly to the Department for the Grants and Donations Trust Fund. 381.986(8)(b)(7)(b).

Facility and Equipment

Immediately post-licensure, we will build out our secured facilities at 710 & 730 NE 19th Place Cape Coral 33909, FL. Cultivation and processing activities will take place exclusively at this location. Additionally, we own dispensary locations at 912 SE 46th Lane, Unit 101, and 543 Northeast 15th Terrace in Cape Coral, and we have a secured lease for 17218 Toledo Blade Blvd

Unit 4-5 in Port Charlotte for dispensing of usable medical marijuana products to qualified patients and caregivers. 381.986(8)(b)(6). Upon award of an MMTC License, we will obtain all required facility building permits and prepare for buildout/renovations. Our renovations will meet or exceed all standards set forth by the FL Building Code, FL Fire Prevention Code, FL Department of Agriculture & Consumer Services, and relevant local amendments. 381.986(11)(d). We will securely store cannabis in locked/alarmed rooms with constantly monitored video surveillance. 381.986(8)(f)1.b. To control odors associated with marijuana operations, we will include a tri-phase carbon filter-based system with a negative air pressure exhaust system. 62-709.500(4)(g). Upon licensure we will purchase the equipment necessary for our business in stages as we ramp up to full production, beginning with security & cultivation equipment, and ending with dispensary accoutrements. We will always accommodate facility inspections by permitted Department employees, at any time. 5K-11.002(3); 381.986(10)(a).

Business Presence

Upon licensure, we will finalize conditional agreements with our packaging vendors, testing laboratories, hiring companies, and community partnerships. Upon award of an MMTC License, we will communicate with neighboring businesses and local law-enforcement agencies. This will allow for any issues with our business to be quickly resolved. We will develop marketing materials for pre-approval from the Department. 381.986(8)(h)(2). Then we will set up an age-restricted website for our business which will feature product details and offer customers the ability to purchase cannabis for curbside retail. 381.986(8)(i).

Our hiring practices, which will be integrated with our DE&I plan, will reflect the broad range of demographics that make up Florida's diverse population. Internally, we will develop processes for peer-recommended promotions, and develop a training program for individuals interested in

executive roles. We will employ a full team including Chief Officers, Dr. Joseph Rosado, Medical Director, Tyler Doster, Director of Cultivation, Ceceilia Zapata, Ph.D., Director of Tissue Culture, Robert Kruty, Director of Dispensary, Andrew Hall, Ph.D., Director of Manufacturing, Devon Peterika, Director of HR and DE&I, and Clint Wynne, Director of Security. 381.986(1)(i); 381.986(3); 381.986(8)(f)(6). We will promote our job opportunities in veteran and minority spaces through our DE&I objectives. We will require all employees to undergo and pass a background check before starting work with us. 64-4.208. All employees will adhere to our alcohol and drug-free workplace policies. 381.986(8)(f)(9). We will conduct internal trainings for all employees and volunteers on our operating procedures and legal requirements for dispensing medical marijuana. 381.986(8)(e)(5).

Cultivation

While we already hold a Certificate of Nursery Registration and upon licensure, will obtain all necessary plant permits from the State, always maintaining proper security for our plants. 581.083.

We will renovate our cultivation facility to include distinct rooms for growing marijuana, separated from any other plants and business processes. 381.986(8)(e)(6)(b). Our facility will feature a bench/stacked bench/trellis system and a sustainable water flow system. Our lighting is sustainable, using LED lights with day/night timers. We will purchase and appropriately store all equipment, tools, nutrients, and pesticides prior to starting operations. Equipment will include water filtration systems, cloning domes, plant sprayers, screen filters, and trim drying racks.

We will staff a team of cultivation employees, including Tyler Doster, Director of Cultivation, Cecilia Zapata, Ph.D., Director of Tissue Culture, Agricultural Specialists, QA/QC staff, and Cultivation Associates. We will abide by OSHA manufacturing standards and have staff certified in OSHA 10 training which allows for the prevention/avoidance/reduction of safety & health

hazards in the workplace. We will provide personal protection equipment (“PPE”) in cultivation areas, including spray suits & face masks. Within 60 days of licensure, and at least 30 days prior to commencing cultivation, we will seek Cultivation Authorization from the Department. 64-4.005(2); 64-4.004(3)(a); 64ER21-10(7). After cultivation has begun, we will procure sustainable packaging materials that will include the universal marijuana symbol. 381.986(8)(e)(11)(f)(IX); 64ER21-13(3)(d); 64ER21-13(7)(c); 64ER20-31(39). We will implement a seed-to-sale tracking system that integrates with the BioTrack THC system selected by the Department, and with the state medical marijuana use registry. 381.986(8)(d); 381.986(6)(a). This system will store our inventory records and always be accessible to the Department. 381.986(8)(d). Cultivation staff will continuously inspect seeds and plants for threatening pests. 381.986(8)(e)(6)(c); 581. We will always store marijuana in a locked and secured area. 381.986(8)(f)(5).

Processing Infrastructure

We will manufacture a variety of products for Florida MMJ patients including edibles and low-THC options. 381.986(8)(e)(7). Our facilities will operate under GMP (Good Manufacturing Practices), FDA 21 CFR §110, TPS (Toyota Production Systems) and Lean Six Sigma systems to ensure efficiency and continuous improvement, practices that will be imbedded into our culture. Upon initiation of cultivation, we will purchase the equipment necessary for manufacturing. Within 120 days of licensure, we will submit the authorization for processing for our secured facilities. 64ER21-10(8). Before producing edibles, we will obtain a permit to operate as a food establishment and solicit initial inspection by the Department. 381.986(8)(e)(8); 500; 5K-11.002(3). We will keep detailed records of all ingredients in our products and will work with Kaycha Labs, a licensed cannabis testing laboratory to confirm potency and safety of our products. 381.986(8)(e)(15); 381.986(8)(e)(11)(d). After we receive a COA, we will package products with

appropriate labels/educational inserts. Post-packaging with the correct labeling, we will transfer products to our medical marijuana dispensing facility.

Dispensary Establishment

During buildout of our medical dispensary, we will place cameras within to constantly record all spaces. 381.986(8)(f)(1)(b). Upon licensure, we will finalize our contract with a point-of-sale (“POS”) vendor and purchase appropriate equipment. Our seed-to-sale tracking inventory will be updated daily by our medical dispensary staff and sync with this POS. We will hire the following medical dispensary staff: General Manager, Security Staff, Receptionists, and Sales Associates. Managers and Chief Officers will train staff on relevant regulations and our internal operating procedures. Within 180 days of licensure, we will be prepared to dispense medical marijuana to our patients and will request authorization from the Department to do so. 64ER21-10(9).

Plan Assumptions

Based on our highly qualified and experienced team, we assume we will meet or exceed the state’s identified timeline for authorization and operations. Edgar Asebey, CEO and Sean Carriger COO have considerable experience orchestrating operations for large teams, complex projects, and rigid schedules. Our executive team members have developed SOPs, selected proper equipment, and hired and trained employees. Our CEO, Edgar Asebey, will oversee our startup timeline and keep our business on track.

Our schedule includes permitting, engineering plans, buildout of facilities with proper equipment, chemovar selection post authorization, and development of internal SOPs. We will perform these activities concurrently to maintain our expected timeline. As regulations allow, we will secure infrastructure for cultivation, processing, and dispensing marijuana prior to licensure and beginning the local permitting processes.

Subsection 4.9.1 – Experience in the Marijuana Industry

Introduction

Dr. Joseph Rosado is a leading physician and a highly respected medical director, educator, published author, and prominent public speaker based out of Central Florida. His extensive experience in the broad field of Integrative Medicine combined with his unique specializations ensure that he can provide a comprehensive level of high-quality care for individuals of all ages and demographics. Dr. Rosado is also bilingual, speaking fluent English and Spanish.

Dr. Rosado is one of the United States' most well-respected physicians working with medical marijuana. He has been regularly featured on major television networks as a guest speaker. Further, he has been invited to speak all over the world, educating other doctors on medical marijuana including in the countries of Fiji, Malaysia, Italy, and Costa Rica.

Marijuana Experience for our Medical Director

Dr. Rosado is a world-renowned medical marijuana expert who not only has over two decades of relevant professional experience, but also over five years of experience in the marijuana space. In 2018, he became a Diplomat of the American Academy of Cannabinoid Medicine as well as the co-Medical Director for Minorities 4 Medical Marijuana, and a Medical Director for marijuanadoctors.com.

In his role as a Physician and Medical Director at Med Diagnostic Inc., DBA Coastal Wellness centers, Dr. Rosado oversaw the medical cannabis recommendations and provided Suboxone Therapy to pain management patients wanting to be weaned off opiates as well as for people suffering from: cancer; epilepsy; glaucoma; HIV/AIDS; Post-Traumatic Stress Disorder (“PTSD”); Amyotrophic Lateral Sclerosis (“ALS”) aka Lou Gehrig's Syndrome; Crohn's Disease (“CD”); Parkinson's Disease (“PD”); Multiple Sclerosis (“MS”); and, Terminal Condition(s). He

served in this position from 2018-2021. As a clinician, he has worked with toddlers, children, adolescents, adults, and geriatric patients for the recommendation and management of medical marijuana. He has been a Medical Cannabis Certifying Physician through DocMJ in Orlando, Florida since 2021.

Dr. Rosado is the Owner and Chief Executive Officer (“CEO”) of International Medical Consultants, Inc. which was formed in 2018. Here, Dr. Rosado provides medical cannabis consulting services to physicians and patients in the United States, Canada, Mexico, South America, the United Kingdom, Europe, and Southeast Asia. He has been a public speaker on all aspects of medical cannabis through his consulting work.

As a medical marijuana advocate, he was and is on the bureau of speakers for political campaigns and medical cannabis dispensaries/ licensed producers.

As a speaker/educator he’s spoken for or with En Agenda 1440 am, Leafly.com, and WeedMaps. As an author, Dr. Rosado has published multiple articles in refereed medical journals and has written the bestselling book, *“Hope and Health—A Case for Medical Cannabis,”* which was published in 2019 through Coastal Press. Some of his noted publications include “A Doctor’s Advice: How to Use Cannabis During Chemotherapy” published in 2019 through Leafly and “Turn On, Tune In...Work Out?” published in 2019 through Rolling Stone Magazine.

In 2019, Dr. Rosado was named one of the 65 Outstanding Black and Hispanic Men Leading in Cannabis by TheWeedHead and in 2020 he was named one of 20 Outstanding Black and Latinx Men Leading Change in Cannabis by Green Entrepreneur.

Conclusion

Throughout his decades of professional experience in the medical field, Dr. Rosado has demonstrated a high level of excellence not only in patient care and wellness, but also in cannabis

research, use, promotion, and advocacy. His world-class recognition and cannabis experience will enable us to better cultivate, process, and dispense marijuana at our facility thanks to his years actively working with and understanding cannabis as a means for overall patient improvement.

Dr. Rosado's hands on clinical work and years of certifying medical marijuana patients will provide our company with the insights to develop more efficacious cannabis therapeutics. Dr. Rosado will work closely with Dr. Ethan Russo, the company's Chief Scientific Officer. Dr. Ethan Russo, MD, is a world-renowned medical cannabis expert, having spent 24 years conducting clinical cannabis research. He is the author of over 50 peer-reviewed journal articles and 7 books. He is a board-certified neurologist, psychopharmacology researcher, and former Senior Medical Advisor to GW Pharmaceuticals. He served as study physician to GW Pharmaceuticals for three Phase III clinical trials of Sativex. Russo graduated from the University of Pennsylvania (Psychology) and the University of Massachusetts Medical School, before residencies in Pediatrics in Phoenix, Arizona and in Child and Adult Neurology at the University of Washington in Seattle. He was a clinical neurologist in Missoula, Montana for 20 years, has held faculty appointments in Pharmaceutical Sciences at the University of Montana, in Medicine at the University of Washington, and as visiting professor, Chinese Academy of Sciences. He is currently Past-President of the International Cannabinoid Research Society and is former Chairman of the International Association for Cannabinoid Medicines. Dr. Russo is the author of *Cannabis Therapeutics in HIV/AIDS*, *Handbook of Cannabis Therapeutics: From Bench to Bedside* and is the founding editor of *Journal of Cannabis Therapeutics*. Together, Dr. Russo and Dr. Rosado bring deep clinical and scientific knowledge regarding the medicinal use of cannabis, cannabinoids, and other cannabis-derived components. Leveraging this knowledge, one of the

main objectives of our company is to develop better and more efficacious cannabis-derived therapeutics and make them available to patients in Florida.

Subsection 4.9.2 – Other Relevant Experience – Medical Director

Introduction

Dr. Joseph Rosado has ample experience which is directly relevant to adequately supervising the activities of our Medical Marijuana Treatment Center (“MMTC”). This includes, but is not limited to, treating patients for various ailments, including terminal conditions, patient education, and dispensing medication. We believe that, with all his expertise in cannabis and in other relevant work in the medical field, Dr. Rosado will make for an exemplary Medical Director capable of all the duties necessary to make this role successful.

Other Relevant Experience for our Medical Director

Dr. Rosado received his Doctor of Medicine from the Universidad Central del Este – UCE (Dominican Republic) in 2001 and his Master of Business Administration from the University of Phoenix in 2005, graduating Magna Cum Laude. Upon completing his medical training, Dr. Rosado worked as a physician, clinic and hospital doctor, and as the Director of the Communicable Disease Division/ Epidemiology and Immunization Departments at St. John’s County Health.

Currently, Dr. Rosado is an Adjunct Professor at Lake Erie College of Osteopathic Medicine, and the Medical Director and Provider at Panacea Alliance and Complete Wellness Medical Centers of DeLand. He is also the CEO and Owner of International Medical Consultants and is on the Scientific Board of Advisors for Medical Extractos in Medellin, Colombia, and Ellipsis in Quebec, Canada.

Through his extensive work in clinical medicine, culminating in over twenty years of hands-on experience, Dr. Rosado has treated patients suffering from the following: 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; and multiple sclerosis (“MS”). In addition, he has treated patients suffering from terminal conditions. This has been done with the hope of recognizing and treating drug dependency, abuse, and addiction, weaning people off an over-dependence on opioids. He has been heavily involved in patient education for individuals across all ages and demographics through consultations, publications, and speaking events internationally. Rosado has spoken throughout the United States, Canada, Mexico, Colombia, Costa Rica, Thailand, Italy, Japan, Malaysia, and Fiji along with being interviewed for ABC, CBS, NBC, Fox, Univision, Telemundo, NPR, and The New York Times. He received the Physician of the Year Award at the Healthcare Achievement Awards sponsored by the Volusia Hispanic Chamber of Commerce. Dr. Rosado has diagnosed and treated patients with substance abuse disorders, has extensive knowledge in pharmaceutical formulations and dosage forms, along with dispensing medications. He has been a part of and documented clinical trials and quality control in laboratory settings.

Conclusion

Dr. Rosado has all the necessary relevant experience in non-cannabis fields to work effectively in supervising the necessary activities of our MMTC. We believe that given Dr. Rosado’s thorough and diverse experience in medicine, advocacy, business, and education, he will be able to exceed all the necessary requirements for this Medical Director role.

CURRICULUM VITAE
Joseph Rosado, M.D., M.B.A.
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Altamonte Springs, FL 32714
407-575-8525 Cell Phone
E-mail: jrmddc@gmail.com

EDUCATION

2008-2009	Hospital Metropolitano San Juan, PR Rotational one-year internship; was the Chief Intern
2003-2005	MBA/Health Care Management University of Phoenix Phoenix, AZ
1997-2001	Doctor of Medicine Degree Universidad Central Del Este San Pedro de Macoris, Dominican Republic
1989-1992	Doctor of Chiropractic Degree Life College, School of Chiropractic Marietta, GA
1990-1992	Life College, School of Undergraduate Studies Marietta, GA Degree: BS in Clinical Nutrition
1983-1988	Valencia Community College Orlando, FL Degrees: A.S., Emergency Medical Services A.A., General Education E.M.T. Certificate

PROFESSIONAL EXPERIENCE

01/2023—Present	Total Care Medical Services Palm Bay and Vero Beach, FL CMO/Physician
<ul style="list-style-type: none">➤ Responsible for providing oversight and medical expertise for the providers of the Management Services Organization.➤ Provide primary care services on an as needed basis.	

PROFESSIONAL EXPERIENCE, Cont.

- Promote the organizational goals and objectives and assured that quality health care services were delivered by the providers.

08/2022—Present Lake Erie College of Osteopathic Medicine
 Bradenton, FL
 Adjunct Professor

- Course director and instructor for the LECOM School of Health Services Administration (SHSA) programs as assigned on a part-time basis.
- Assist with curriculum development, review and on-line distance education delivery in a compliant fashion via LECOM's Learning Management System (LMS).

05/2022—Present Panacea Alliance
 St. Augustine, FL/Virtual
 Medical Director/Provider

- Responsible for evaluating, managing and treating patients with mental/behavioral health issues face-to-face and/or virtually.

10/2021—Present Complete Wellness Medical Centers
 DeLand, FL
 Medical Director/Provider

- Responsible for evaluating, managing and treating patients with osteoarthritis and/or degenerative joint disease and peripheral neuropathy with Regenerative Therapies.

04/2021—Present DocMJ
 Central FL
 Medical Cannabis Certifying Physician

- Provide medical cannabis recommendations in both English and Spanish.

11/2018—Present Medical Extractos
 Medellin, Colombia
 Scientific/Clinical Director

- Provide scientific and clinical direction for a Colombian company dedicated to working with natural Cannabis, of medical quality, at all stages for the production of medicinal, industrial, cosmetic, food and scientific products.
- Oversee cultivation, transformation, production, formulation and commercialization of derivatives, as well as investment in research, technology and scientific development.

PROFESSIONAL EXPERIENCE, Cont.

02/2018—Present

International Medical Consultants
DeLand, FL
President and CEO

- Provide medical cannabis consulting services to physicians and patients in the US, Canada, Mexico, Central and South America, UK, Europe, Pacific Islands, Asia and Southeast Asia.
- National and international public speaker on all aspects of medical cannabis to include but not be limited to managing patients with medical cannabis in English and Spanish.

06/2021—08/2022

Northeast FL Health Services, Inc. DBA
Family Health Source
DeLand, FL
Medical Director

- Responsible for providing oversight and medical expertise in implementing the Medical Management Program.
- Promoted the organizational goals and objectives and assured that quality health care services were delivered by the providers.

OTHER RELEVANT EXPERIENCE

1984-1992

Licensed EMT/Paramedic in Florida

1987-1989

Heart Cath Lab Technician in Orlando, FL

1989-1992

Lead Lab Tech of Medical Laboratory performing hands on chemistry testing in Marietta, GA

1989-1992

Licensed EMT/Paramedic in Marietta, GA

1993-1998

Licensed Chiropractic Physician in Ohio, Arizona, Texas

1994-1998

Licensed Chiropractic Physician in Puerto Rico

2001-2002

Physician in Dominican Republic

2004-2009

Medical Director/Chief Medical Officer (CMO) for Diabetes Research Consultants.

2002-2005

Chiropractic Physician and Clinic Director in Salt Lake City, UT

2006-2008

College professor teaching: Anatomy and Physiology, Microbiology, Clinical Skills, Medical Ethics, Pharmacology and Pathophysiology.

2007-2008

Clinic Faculty Supervisor—International (San Jose, Costa Rica)

OTHER RELEVANT EXPERIENCE, Cont.

2009-2011	Lead Sr. Physician, Director of Communicable Disease Investigation and Prevention Department and Med Room Director; Clinical Quality Management Director at St. Johns County Health Department in St. Augustine, FL.
2011-2012	Primary Care Physician, Primary Care Clinic and Laboratory Director at Avanti Wellness Center a Community Mental Health Center.
2012	Primary Care Physician at EMed Primary Care & Walk-In Clinic in Jacksonville, FL.
2012-2013	Medical Director, ER coverage and admitting physician at Tricounty Hospital in Williston, FL.
2012-2013	Primary Care Physician at Institute for Cardiovascular Excellence in Ocala, Williston and The Villages, FL.
2013-2015	Locum Tenens Physician at the North Florida Evaluation and Treatment Center in Gainesville, FL, Pinellas County Jail in Clearwater, FL, Escambia County Jail in Pensacola, FL and Family Health Source in Deland and Deltona, FL.
2016—2017	Primary Care, Civil Surgeon, Medication Assisted Therapy provider and Medical Cannabis Physician with Genesis Family Practice in Orange City, FL, Comprehensive Health Center of Orlando, in Orlando, FL and Coastal Wellness Centers in Ormond Beach, FL.

SKILLS

Translate professionally from Spanish to English and vice versa.

[http://search.overdrive.com/ti/69f80901-dfbb-490b-a80c-87ea9db714f3-50-1-1-1-1-spanish-medical-conversation-joseph-rosado-md-ebook](http://search.overdrive.com/ti/69f80901-dfbb-490b-a80c-87ea9db714f3-50-1-1-1-1/spanish-medical-conversation-joseph-rosado-md-ebook)

AUTHOR

Book:

- Hope & Healing-The Case for Cannabis

Publications:

- A Doctor's Advice: How to Use Cannabis During Chemotherapy
Publication date: July 2, 2019; Publication description: leafly.com
- Turn On, Tune In...Work Out?
Publication date: May 8, 2019; Publication description: Rolling Stone Magazine

Publications: Cont.

- PTSD or Clinical Endocannabinoid Deficiency?
Publication date: Apr 19, 2019; Publication description: Jr Neuro Psych and Brain Res: JNPBR-126.
- Medical Cannabis for Autism Spectrum Disorder, is it an option?
Publication date: Feb 1, 2019; Publication description: World Academy of Medical Sciences: Medical & Clinical Research.
- A Clinical Case Study of a 45 y/o Female Suffering with PTSD, Bipolar D/O, Depression, Anxiety and Chronic Pain Syndrome Taking 42-58 Pills Per Day and Weaned off of All Medications Using Medical Cannabis
Publication date: Jan 4, 2019; Publication description: Journal of Clinical Review & Case Reports.

AWARDS

Global Health & Pharma's Fourth Annual Commercial Cannabis Awards for Most Comprehensive Medical Care Provider in Florida	2023
Healthcare & Pharmaceutical Awards 2022, hosted by Global Health & Pharma: Best Family-Orientated Preventive Medicine Clinic - East Coast USA	
Family Physician of the Year	2022
Best in DeLand—Medical Consulting	2022
Healthcare Achievement Awards Healthcare Administrator of the Year	2022
Healthcare Achievement Awards Wellness Physician of the Year	2021
One of 20 Outstanding Black and Latinx Men Leading Change in Cannabis	2020
One of 65 Outstanding Black & Hispanic Men Leading in Cannabis	2019
Healthcare Achievement Awards Physician of the Year	2019
Outstanding Public Servant Award	2017

LICENSES & CERTIFICATIONS

Commonwealth of Puerto Rico Medical License	17,750
FL Medical License	ACN 336

LICENSES & CERTIFICATIONS, Cont.

MI Medical Doctor License	4301503359
MI Controlled Substance License	Available upon request.
Federal DEA #	Available upon request.
Suboxone Certification since 02/2011	Available upon request.
NPI	1104068584
Medicare #	DB614Z
CAQH#	12085965
FL Low THC-High CBD Prescriber Certification	
FL Low THC-High CBD Medical Director Certification	
BLS Certification	05/2021-05/2023

SUBSECTION 4.9.3 – OVERSIGHT

Our medical practices are based on comprehensive research and science-based care of our qualified patients. Dr. Joseph Rosado, our Medical Director, will supervise our medical marijuana activities. 381.986(8)(b)(9). Dr. Rosado has years of experience working directly with medical marijuana as a therapeutic for various indications. As Chief Medical Officer at Total Care Medical Services in Palm Bay, Florida, Dr. Rosado is responsible for providing oversight and medical expertise for the providers of the Management Services organization. This experience will transfer directly to Dr. Rosado's role as Medical Director of our company. Dr. Rosado has successfully completed a two-hour course entitled Florida Medical Course for MMTC Medical Directors and has passed the subsequent examination offered by the Florida Medical Association, which encompass the requirements of this section and any rules adopted hereunder. 381.986(3)

Scope of the Medical Director's Responsibility

Dr. Rosado will provide medical expertise to our company to guide research and development of products, aid in creation of patient educational materials, and support staff training programs based on patient feedback. The Medical Director will advise the advisory board, executive team, and other company leadership on significant clinical, scientific and industry advancements relevant to operations. Dr. Rosado's responsibilities, supervision, and oversight over the activities of our licensed MMTC is imperative to our success and the thoughtful care of our qualified patients. Dr. Rosado, holds an active, unrestricted license as an allopathic physician. 381.986(1)(i). We constructed a detailed plan for Dr. Rosado, to supervise the activities of our MMTC. 64-4.002(2)(h)(16).

First, Dr. Rosado will create 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. Rosado will apply his medical expertise and best practices to develop patient care policies and procedures. He will write these procedures in alignment with the American Society of Addiction Medicine (“ASAM”). ASAM’s criteria is the results of a collaboration that began in the 1980s to define one national set of criteria for providing outcome-oriented and results-based care in the treatment of addiction. Today, the criteria have become the most widely used and comprehensive set of guidelines for placement and continued treatment of patients with addiction and co-occurring conditions. ASAM provides an indispensable resource for us to provide a nomenclature for describing the continuum of options available to our medical marijuana patients.

Second, Dr. Rosado will train staff in those standard operating procedures. Our Medical Director will also stay up to date on cannabis science and research and relay that information and to our employees during regular trainings.

Dr. Rosado will consult with our production teams on product creation to best serve our patients’ needs and will contribute knowledge of modern medicine and of the latest and most reliable cannabis science. For ongoing patient and community safety, Dr. Rosado will help us to maintain a high degree of consistency in our cultivation and processing products. He will create educational materials for patients and the community at large to inform about the benefits and side effects of medical cannabis products.

Once there is a medical determination made of existing medical conditions, our medical staff will explore why the patient is seeking marijuana as medication. However, our Medical Director will never make recommendations directly to our customers. By remaining unaffiliated with ordering physicians, Dr. Rosado will keep an objective perception of each patient. He will also stay up to date on ongoing research in the medical marijuana industry.

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 ample notice if he were to leave his 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 or other event which renders our Medical Director incapable of continuing in their position, Edgar M. Asebey, M.D., our CEO's father, would be immediately available to assume the role of Medical Director until a permanent replacement could be identified and hired. Dr. Asebey is a highly trained physician who has over 40 years of clinical medicine experience and who has already taken and passed the Florida Medical Marijuana Course for MMTC Medical Directors. (Certificate available upon request.) In addition to Dr. Asebey, our full staff will include alternate employees who can fulfill the role of Medical Director, and we have already identified other candidates who could serve in the position should the need arise. Importantly, we are connected with several executive recruiting companies for the cannabis industry, such as H2 Talent, that can assist in placing high-level employees almost instantly, including Medical Directors.

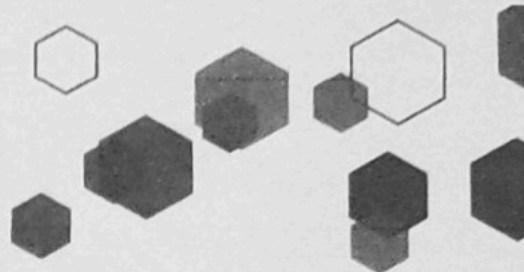
If we do require a change in Medical Director, we will submit a request to the department using Form DH8019-OMMU-11/2018, "Medical Marijuana Treatment Center Variance Request." 64-4.023(2). We will not hire a new Medical Director prior to that individual passing a required background screening. 64-4.023(5).

SUBSECTION 4.9.4 – MANAGING CONFLICTS OF INTERESTS (1 PAGE MAX)

Our business will operate as a vertically integrated Medical Marijuana Treatment Center (“MMTC”) with a Medical Director to supervise our activities. Section 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).

As a qualified physician, our Medical Director, Dr. Joseph Rosado, will not be employed by, or have any direct or indirect economic interest in, an MMTC or CMTL. Section 381.986(3)(b), F.S. While he is currently a Qualified physician, Dr. Rosado will relinquish his qualified rights post-licensure. Joseph Rosado has successfully completed the 2-hour course and has subsequently passed the examination offered by the Florida Medical Association which encompasses the requirements and any rules adopted hereunder. Section 381.986(3)(c), F.S. Dr. Rosado, and other staff do not own or engage in an executive role at a testing facility or treatment center. Our medical staff will also refrain from any relationships with ordering physicians that could result in kickbacks. Upon request, our Medical Director can present a list to the Department of ordering physicians.

Our staff's relationships within the community will benefit patients in our market area. To facilitate openness about our relationships, we will proactively communicate to the Department our community connections. We value the quality of patient care that we deliver and will not engage in conflicts of interest. Our Medical Director will refrain from accepting gifts from any pharmaceutical or healthcare companies. Further, we will not accept promotional engagements on behalf of other companies. Dr. Rosado will supervise our activities and will present unbiased factual and science-based education to our owners, managers, employees, and patients.



FORM 4: MEDICAL DIRECTOR ACKNOWLEDGMENT

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

Name (Printed):

Joseph Rosado, MD

Signature:

Joseph Rosado, MD

Florida MD or DO License #:

ACN 336



Accreditation PROGRAM

© 2004 Blackwell Publishing Ltd, *Journal of Internal Medicine* 255: 105–112

Florida Medical Association

Certifies that

Joseph Rosado

has participated in the enduring material titled

Florida Medical Marijuana Course for MMTC Medical Directors

on 3/19/2023 3:38 PM Eastern

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

SUBSECTION 4.10.1 – PERSONNEL QUALIFICATIONS

Our Medical Marijuana Treatment Center MMTC (“MMTC”) will be staffed by some of the best individuals the medical, marijuana, and business spheres can offer to navigate the complex and ever-changing regulations and remain in compliance with state and local rules. We have selected several individuals to fill some of the most critical positions to our medical operation. All individuals we hire will be subject to background checks. Rule 64-4.208. They will also all be over the age of 21. Chapter 381.986. Our MMTC is structured with six departmental categories: Advisory, Executive Suite, Cultivation, Medical, Extraction, and Operational. The necessary positions detailed below will not only satisfy the requirements from the State of Florida but exceed expectations. Each of the individuals below also meets the requirements for the qualifications mandated to complete the duties of their respective roles. We understand that failing to meet these requirements can subject us to fines. Chapter 381.986(10)(f)(1-13).

Necessary Positions Filled and Qualifications/Experience

Edgar Asebey, Chief Executive Officer – (“CEO”)

Edgar J. Asebey, Esq., is a regulatory and transactional attorney with over two decades of experience in federal regulation of pharmaceutical, biotech, medical device, food, dietary supplement and cosmetics companies. Since 2015, he has been working on Cannabis-related matters and transactions, and since 2018 he has provided regulatory compliance, business transactional services to hemp and CBD companies. Edgar brings over 2 decades of regulatory experience to life science, cannabis and hemp/CBD clients.

Edgar practices before the Food and Drug Administration (FDA), United States Department of Agriculture (USDA), Customs and Border Protection (CBP), Environmental Protection Agency (EPA), and the Federal Trade Commission (FTC), representing client companies on regulatory

compliance, product approval/registration and FDA enforcement defense matters. He also assists clients with international and domestic business transactions, IP licensing, venture finance, trademark protection and import/export matters.

Edgar studied molecular biology at The University of Chicago and spent 5 years working in molecular biology research laboratories at the University of Chicago and the University of Illinois School of Medicine. Early in his career he served as a Patent and Licensing Advisor to the Natural Products Branch of the National Cancer Institute at the National Institutes of Health (NIH). He founded and served as president of Andes Pharmaceuticals, Inc., a natural products drug discovery company, from 1994 to 2001, and has served as in-house counsel to two life sciences companies. Most recently he was an equity partner in the Health Care & Life Sciences Practice Group at Jones Day. Edgar is currently a partner at Keller Asebey Life Science Law, PLLC and serves as Counsel to Mr. Cannabis Law (FL) and Torrey Pines Law Group (San Diego, CA).

Edgar holds licenses to practice law in Florida and Washington, D.C., and he can represent clients on federal regulatory matters in all 50 states. He is a member of the American Bar Association (Section on Administrative Law & Regulatory Practice: Food and Drug Committee), Food & Drug Law Institute (FDLI), Dade County Bar Association, and BioFlorida. He is also the author of the legal treatise *Legal Guide to the Business of Marijuana* (PLI Press, 2022).

Robert Velarde, Chief Financial Officer – (“CFO”) (Reports to CEO)

Robert Velarde has more than a quarter century of investment management experience with private equity and venture capital fundraising, investment, portfolio management, and successful investor relations, as well as proven experience building private markets investment platforms as a senior leader in institutional and family office investment firms.

As an experienced investment committee member of global, regional, and country-specific private equity and debt funds, Robert possesses unique insight into various aspects of finance, accounting, investing, and financial planning.

Starting in 1996, Robert has served as a Senior Managing Director or Managing Partner for 7 prominent investment firms including JP Morgan Chase and AIG. In his previous roles, Robert has been responsible for the overall strategic direction and operational management of investment firms, as well as responsibility for fund operations, new fund initiatives, and making investment decisions for venture capital, private equity, and debt funds globally. In 2020, Robert co-founded and is Managing Partner of Iter Investments, a global venture capital firm that focuses on investing in early-stage companies across multiple sectors of the psychedelics industry, with a particular emphasis on addressing the underserved mental and behavioral health sectors.

Robert earned a Master of Business Administration from Harvard Graduate School of Business Administration, and an Economics degree from Northwestern University. He is currently the Senior Advisor for Food Systems of the Future, non-profit enterprise that seeks to support market-driven food and agriculture companies to sustainably and measurably improve nutrition outcomes for low-income and underserved communities in the US and in East Africa.

Sean Carriger, Chief Operations Officer – (“COO”) (Reports to CEO)

Sean Carriger is an award-winning cultivator, experienced business owner, operator, executive, and consultant of vertically integrated cannabis businesses in multiple states & countries including Colorado, Oregon, Missouri, New Jersey, California, Arizona, Michigan, Mexico, Belize, and Colombia. Sean founded a hemp and cannabis tissue culture venture focused on developing a diverse clean stock cultivar portfolio and led the design and buildout of 2.4 million square feet of licensed cannabis cultivation and production facilities. Sean has been the lead

application writer on 18 wins in merit-based applications and has written SOP's that have earned cGMP & GAP certification for multiple cultivation & manufacturing facilities.

Internationally, Sean has presented to the Belizean Senate, House of Representatives, and the Deputy Prime Minister on cannabis & hemp policy and cannabis industry standards & best practices. Domestically, he is the President of Agri-Genesis, a vertically integrated cannabis start-up that has won 9 licenses and employs 150+ skilled personnel. Sean is also the founder and COO of Craiger Enterprises, a tissue culture laboratory that focuses on the research and development of cannabis & hemp genetics. He was formerly the COO of Show Me Alternatives, Missouri's first cGMP certified cannabis manufacturing facility, with 3 associated retail locations, and was the founder, owner and operator of Mana Holdings, a vertically integrated MSO successfully operating 4 cultivation, manufacturing and distribution licenses in Colorado and Oregon.

Sean is the cannabis curriculum & internship development partner for Truman State University, a member of Kansas State University's Hemp research pilot program, and a member of the Society of Cannabis Clinicians, and sits on the Board of Directors of the Missouri Independent Medical Cannabis Association, and a member of the Marijuana Policy Project.

Kara Lavaux, Chief Compliance Officer—("CCO") (Reports to CEO)

Kara Lavaux is recognized nationwide as a subject matter expert and industry thought leader in cannabis regulation, quality management, and compliance. Kara is also a public educator and is regularly invited to speak at national conferences and webinars and is interviewed frequently by cannabis and traditional media. Kara has developed quality management systems for over 20 hemp and/or cannabis clients, all of which successfully passed GMP certification audits. She has participated in national workgroups in 2018/2019 and again in 2023 for the National Environmental Health Association to develop cannabis resources for health departments. Kara is

currently a Compliance Expert for Allay Consulting, a prominent cannabis compliance consulting firm. Here she serves as a subject matter expert on hemp and cannabis compliance such as state-specific regulations, food safety, public health, consumer protection, FDA cGMPs, USDA NOP, ISO, and third-party compliance standards. She also interprets and applies state cannabis regulations across the US for clients located in California, Oregon, Washington, Utah, Colorado, Missouri, Massachusetts, New York, Florida, Michigan, and Puerto Rico. Formerly, Kara was the Food & Marijuana Supervisor for the Department of Public Health & Environment, Public Health Investigations in Denver, Colorado, where she oversaw all product recalls and provided public statements to media, represented Denver on the 2019 Colorado Hemp Advancement & Management Plan, and managed teams of food & cannabis investigators.

Kara is an Adjunct Instructor in the Cannabis Business and Science Program for the Community College of Denver, and an Online Instructor for the Corrective Action/Preventive Action (CAPA) for Cannabis for the American Society for Testing and Materials (ASTM), and holds a degree in Environmental Health. Kara is a Certified Quality Auditor by the American Society of Quality, a Certified Professional in Food Safety by the National Environmental Health Association, OSHA 10 Certified, and is a Registered Environmental Health Specialist with the National Environmental Health Association.

Doctor Joseph Rosado, Medical Director (Reports to CEO)

Dr. Joseph Rosado is a leading physician and a well-respected medical director, educator, published author, and prominent public speaker based out of Central Florida. His extensive experience in the broad field of Integrative Medicine combined with his unique specializations ensure that he can provide a comprehensive level of high-quality care for individuals of all ages and demographics. Rosado is also bilingual, speaking fluent English and Spanish.

Rosado is one of the United States' most well-respected scientists working with medical marijuana. He has been regularly featured on major television networks as a guest speaker. Further, he has been invited to speak all over the world, educating other doctors on medical marijuana including in the countries of Fiji, Malaysia, Italy, and Costa Rica. We have written about Dr. Rosado extensively in subsections 4.9.1 and 4.9.2.

Tyler Doster, Director of Cultivation – (“DOC”) (Reports to COO)

Tyler Doster is an award-winning cannabis cultivator and propagation expert. For more than 2 decades, Tyler has cultivated dozens of genetic varieties of cannabis, acting as an independent consultant for a multitude of companies and stakeholders. From 2009-2017 Tyler cultivated medical cannabis under the OMMP act in Oregon for over 96 patients across 4 different grows he designed, built, and operated. Tyler implemented standard cultivation SOPS that were used in multiple commercial operations in Oregon, Washington, Oklahoma, California, and Florida. From 2017 to 2021 Tyler was the Director of Cultivation for Headrush Hill, a licensed Oregon recreational cannabis company, and since 2022 he has been the Director of Cultivation for Byrn Brand and Gold Leaf, a licensed Medical Marijuana Treatment Center in Florida. By the end of 2023, Tyler will also be the Director of Cultivation for Doghouse Florida, which is a licensed MMTC that will open before the end of the year.

Tyler is a cannabis genetics specialist and breeder that has developed proprietary genetics for global clients. These efforts have earned him several awards for the quality and terpene content of his cannabis products. He has consulted with dozens of cannabis companies regarding legal operations in many different U.S. states and is well-known for his wholesale clone operations and propagation expertise. Tyler specializes in automation and fertigation of cultivation facilities, and

is also an Integrated Pest Management specialist, earning Green Clean Certification from the State of Oregon in 2016.

Technically proficient with cannabis software and applications such as Metrc, Dutchie, Leafly, and other programs related to cannabis cultivation and compliance, Tyler is also adept at tissue culturing, developing organic and synthetic fertilizer formulas for vegetation and flowering states, as well as solventless production of hashish, and remediation of cannabis to remove heavy metals or toxins.

Andrew Hall, Ph.D., Director of Manufacturing– (“DOM”) (Reports to COO)

Andrew Hall is a senior level Scientific Officer/Director with a focus on Pharmacognosy, Drug Development, and Natural Products. He has substantial experience in pharmaceuticals, natural products chemistry, analytical chemistry, drug development, and formulations. Andrew is a multifaceted scientist with expertise in drug discovery, method development, accreditation licensing, product development, validations, GMP manufacturing, FDA compliance 21CFR (Part 211 +8020), product commercialization, and regulatory compliance. His comprehensive background includes preclinical IND product development, study design, and data submission, as well as product-specific testing strategies for Federal, State, and FDA compliance.

Andrew is the Vice President of In-Vitro Diagnostics, where he leads all research and development, FDA and Health Canada communication and 510K submissions, regulatory, quality assurance, quality control, tech transfers/asset acquisition, for point of care, and OTC in-vitro diagnostic medical devices development and manufacturing. He was recently the Vice President of Research and Development of Verano, where he was a key member of the executive leadership team accountable for spearheading all research and development projects, with additional responsibility for product development and commercialization for a multistate cannabis operation.

Andrew led Verano's corporate initiatives of innovation and R&D, managed a national team, and administered a \$5MM budget.

Andrew has served as Chief Scientific Officer of Green Scientific Labs, the Laboratory Director for Sonoma Lab Works, the Study Director for Toxikon Corporation, the Chief Chemist at Physicians' Lab, and a Quality Control Specialist for Rhodes Technology. He is fully proficient in separation science/Chromatography, HPLC HPLC/MS/MS, HPLC-MS-ELSD-PDA, ICP-MS, GC, GC w/Headspace Analyzer, GCMS, GC-FID UV/Vis, NMR, FT-IR. Polarimetry, CD, and Near IR technologies and applications. Andrew earned a Doctorate in Chemistry from the Florida Atlantic University.

Robert Kruty, Director of Retail Operations – (“DOR”) (Reports to COO)

Robert Kruty is currently the Regional Manager at Cresco Labs in Florida, where he is responsible for business execution, operational excellence, and patient experience in 10 stores across the state, including highest volume stores in Oakland Park and Ft. Lauderdale. Here he also develops weekly and monthly reporting tools for management and upper management to utilize across all platforms to track and manage KPI performance and drive incremental growth and profitability. Robert was formerly the Regional Manager of Curaleaf in Florida, where he was responsible for business execution, operational excellence, and patient experience in 16 stores across the state including highest volume stores in Bonita, Fort Myers, and the Jacksonville area. In this role Robert opened 5 stores from October '20 to March '22 - including Panama City and Pensacola without an existing presence - which exceeded expectations and posted the highest grand opening days in the state while driving the highest Google review performance at 4.9 for new stores.

Robert was also the Regional Manager of Medmen in Florida, where he opened the first Flagship location in West Palm Beach, shortly thereafter exceeding the sales plan and ADS expectations through the fiscal year. In this role he also developed programs to engage the community via local business and residential canvassing, community outreach, and physician partnerships. Robert also has extensive experience in retail operations as a District Manager for Abercrombie & Fitch, Tilly's, and Hot Topic.

Clint Wynne, Director of Security – (“DOS”) (Reports to CCO)

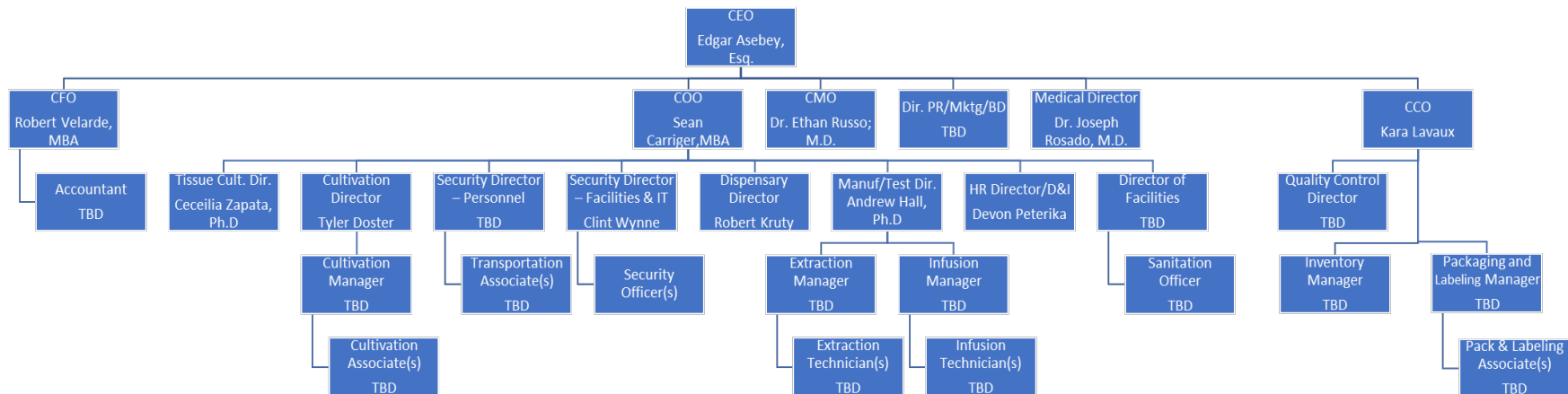
Clinton H. Wynne Jr. is a security expert with over 40 years of experience in consulting on security issues for private businesses, municipal, state, and federal government facilities, educational campuses, civic organizations, and numerous architects and engineers. He is currently serving as the Director of Security for Evolution Properties II. His experience in security management has spanned various areas, including cannabis cultivation, processing, distribution, and dispensing facilities; federal, state and local government; nuclear and fossil fuel industries; correctional industry; healthcare, state and municipal courts and administration buildings; nursing care industry; schools and college campuses; airports and airlines; the U.S. military; museums; and retail. Wynne's expertise in cannabis consulting is particularly noteworthy. He has consulted on over 45 medical and adult use cannabis facilities in multiple US states, and has extensive experience in developing policies and procedures, designing electronic security protection, installing and integrating security systems, and overall management. He holds several licenses and certifications, including Certified Protection Professional (CPP), Board Certified in Security Management, Certified Homeland Security (CHS), and Certified Physical Security Network Associate (PSNA), among others.

Ethan Russo, Chief Scientific Officer

Dr. Ethan Russo, MD, is a world-renowned medical cannabis expert, having spent 24 years conducting clinical cannabis research. He is the author of over 50 peer-reviewed journal articles and 7 books. He is a board-certified neurologist, psychopharmacology researcher, and former Senior Medical Advisor to GW Pharmaceuticals. He served as study physician to GW Pharmaceuticals for three Phase III clinical trials of Sativex. Russo graduated from the University of Pennsylvania (Psychology) and the University of Massachusetts Medical School, before residencies in Pediatrics in Phoenix, Arizona and in Child and Adult Neurology at the University of Washington in Seattle. He is Past-President of the International Cannabinoid Research Society and is former Chairman of the International Association for Cannabinoid Medicines. Dr. Russo is the author of *Cannabis Therapeutics in HIV/AIDS*, *Handbook of Cannabis Therapeutics: From Bench to Bedside* and is the founding editor of *Journal of Cannabis Therapeutics*.

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/most necessary positions, we will be prepared to fill those and other non-necessary positions in case of an opening 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 high standards for compliance.



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. 381.986(8)(f)(9). We will require all applicant owners, managers, board members, officers, and employees to pass a level-2 background screening as provided under chapter 435, excluding those with disqualifying offenses provided in 435.04, in addition to showing that the individual has no arrest awaiting final disposition, a finding of guilt, regardless of adjudication, or a guilty or nolo contendere plea to an offense under Florida Statutes Chapters 837, 895, and 896, or a similar law of another jurisdiction 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 any and all risks associated with such. 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

As a Medical Marijuana Treatment Center (“MMTC”), 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 train employees to understand the importance of ethics and compliance within the medical field. Our trainings will comprehensively address the Health Insurance Portability and Accountability Act (“HIPAA”) and compliance with all applicable laws and regulations, patient counseling, and data collection. 64-4.002(2)(a)(25)(a-e). Devon Peterika, Director of HR and DE&I will oversee the administration of training and record training attendance for all employees and owners.

Patient Confidentiality

The confidentiality of protected health information (“PHI”) in any form or medium is paramount to the successful operations of any MMTC. When it comes to personnel training on patient confidentiality, specifically how it relates to PHI, not every employee will receive the same training. Patient confidentiality training will be delivered in-person and through electronic means, with documentation of employees completing training that covers such topics as HIPAA, PHI, section 381.986, and other requirements of the Department. Specifically, personnel training will focus on preventing accidental breaches of information. 507.171(1)(a). Staff will be trained to prevent and mediate inadvertent breaches of privacy within communal spaces and any room or space which may have access to a computer screen, or physical medical records. Management and staff will be trained to report any situation where information could accidentally be leaked, and how to manage any accidentally leaked information appropriately and swiftly. In the event of a

breach of PHI, we will strictly adhere to the HIPPA Breach Notification Rule, 45 CFR §§ 164.400-414.

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 will be led by leading cannabis educators Dr. Ethan Russo and Dr. Joseph Rosado to be 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. To ensure clarity and consistency, we will adhere to the State of Florida's definition of marijuana, as outlined in 381.986(1)(f), Patients will be educated on key terminologies, including those related to edible marijuana products, as defined in 381.986(1)(d), Moreover, we will train our associates to educate patients on all the state's qualifying medical conditions, and they will explain these conditions in writing and verbally to the patients. We will also incorporate patient education into our product packaging by including an insert in each package which will provide information about the specific product. This insert will include details related to clinical pharmacology, indications and use, dosage and administration, dosage forms and strengths, contraindications, warnings and precautions, and adverse reactions. Section 381.986 (8)(e)(12)(a)-(g).

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. Employees will be trained in information security and to double-check that materials and documents are secured when not in use. All electronic records will be password protected, and we will deploy privacy measures such as privacy screens (which make screens opaque from side angles) on computers. Additionally, employees will be prohibited from discussing a patient's PHI with anyone other than the patient. As a medical industry best practice, employees will adhere to state-provided guidelines for patient records retention. 456.057. We will maintain detailed and thorough logs of patient healthcare information such as treatment, prescriptions, and other PHI for 2 years or 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, 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). 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. When dispensing marijuana or a marijuana delivery device to a qualified patient, all legal requirements will be strictly adhered to. This includes verifying that the qualified patient or caregiver, if applicable, each have an active registration in the medical

marijuana use registry and an active and valid medical marijuana use registry identification card. All amounts and types of marijuana dispensed will be sure to match the physician certification in the medical marijuana use registry for that qualified patient, and employees will verify that the physician certification has not already been filled. Furthermore, the employee who dispenses the product will be required to enter specific information into the medical marijuana use registry. This includes the employee's name or unique identifier, the date, time, quantity, and form of marijuana dispensed, the type of marijuana delivery device dispensed, and the name and medical marijuana use registry identification number of the qualified patient or caregiver. Kara Lavaux, 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 Employees will be trained on identifying and understanding the role of business associates and their importance in preserving confidential patient information. 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.

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 on these standard operating procedures using our employee training plans. 64ER21-13(3)(d).

Complaints

We will have a process in place for individuals, such as patients, to make complaints concerning the confidentiality of information and how it is being collected, handled, and stored, and we will train our employees on these procedures. Sean Carriger, Chief Operating Officer, will handle the collection and recording of complaints and will oversee the process of investigating the complaint and determining if the complaint can be substantiated.

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) Consent must be granted by the patient before recording their voice or obtaining an image of them. All employees will be trained once hired about patient consent and will be expected to know all our SOPs related to consent. Patients will be notified of any limitations to confidentiality on transmissions they send or receive from our center. We will obtain the voluntary and informed written consent of the patient for medical use of marijuana each time the qualified physician issues a physician certification of the patient, which will be maintained in the patient's medical record. The patient, or the patient's parent or legal guardian, must sign the informed consent acknowledging that the qualified physician has sufficiently explained its contents. The physician will use a standardized informed consent form adopted by the Board of Medicine and the Board of Osteopathic Medicine. 381.986 (8)(a-h).

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 heavily

address emergency protocols in personnel training. Employees will also be thoroughly trained on emergency scenarios involving diabetic emergencies. 943.1726.

Marijuana

Employees will be trained on 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. Our Medical Advisory Board Chair and CSO, Dr. Ethan Russo will help develop and implement these training and education programs, and, when possible, will deliver training directly to employees via lectures, seminars, classes, and presentations. Dr. Russo, CSO will assist our MMTC in ensuring that employees have a firm understanding of marijuana plants and their components, along with the products produced with it, to adequately treat patients. Our trainings will meet and exceed those established by the State for the Department of Law Enforcement. 943.17261. Such training will include understanding cannabidiol (CBD), tetrahydrocannabinol (THC), other cannabinoids, and terpenes, which account for most constituents 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 center to determine compliance with its rules and regulations. We understand that the Department will conduct at least a biennial inspection of our center 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 possibility of consequences if our center is not in compliance.

SUBSECTION 4.11.1 – DIVERSITY PLAN

Promoting diversity is one of our top priorities. 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 (MBE) and veteran business enterprises, domiciled in Florida. 288.703(1)(3)(4); 295.187.

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 DE&I 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). We have contracted with 6 minority owned enterprises registered with the State of Florida to provide supporting and peripheral services to our MMTC. We have executed LOI's with each of these MBE and will include these as an addendum to this application. We also have an LOI with Talent Strategy staffing to support our hiring DE&I goals.

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. Devon Petrika, Director of HR and DE&I, will spearhead efforts to hire, retain, and promote a

diverse group of talented employees and 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 40% of our staff to be minority persons and veterans immediately upon operations in year 1 and 50% 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. 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 have engaged with 6 certified MBE and VBE businesses to provide services for our MMTC. We have executed LOI's with these minority businesses available upon request. 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.

Hiring and Outreach

We will recruit minority persons 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, creating university partnerships with key major programs in agriculture and business, and leveraging connections with local nonprofit organizations that assist with minority and veteran hiring. Additionally, we will work with Veterans Florida, an organization that offers recruitment and job placement services for veterans of the US Armed Forces, and partly reimburses qualifying employers for any specialized training or education provided to the candidate.

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 including Veterans Florida 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.

Subsection 4.11.2 – Implementation of Diversity Plan

Diversity is one of our top priorities. We will leverage 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), 295.187, 381.986(8)(b).

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 Devon Peterika, CDE, CDP, CDR (Certified Diversity Executive, Certified Diversity Professional, Certified Diversity Recruiter, respectively), to be our Director of Human Resources and Diversity, Equity and Inclusion to oversee the implementation of our Plan. Her role will focus on maintaining the effectiveness of the plan, communicating regularly with employees about diversity and inclusion, and calling for any adjustments. Our Director of HR DE&I 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 Director of HR DE&I will work with owners and management to ensure we follow appropriate legislation and employment regulations related to bias and inclusion.

We will never engage in practices that discriminate based on 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; ~40% will be members of qualifying minority groups; ~5% will be veterans; and ~2.5% will be persons with a disability. After one year of operations, ~50% 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. After one year of operations, ~40% of employees will be women; ~50% will be members of qualifying minority groups, ~10% will be veterans and, ~5% will be persons 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, which is a core principle of our company. 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

Our Company is committed to developing a culture of diversity and inclusion. This commitment begins at the top, as our CEO, Edgar Asebey, CFO, Robert Velarde and Medical Director, Dr. Joseph Rosado, are all of Hispanic heritage. Accordingly, the Company will feature 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 training 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. 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 pre-licensure plan 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. We have secured Letters of Intent from 6 certified MBE to provide services to our MMTC, and we are actively searching for other minority or diverse partners.

Conclusion

We founded our Company 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.



M.T. Lotz, LLC
Audited Financial Statements

For the year ended December 31, 2022

Prepared Under Generally Accepted Accounting Principles (GAAP)

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INDEPENDENT AUDITOR'S REPORT

To the Management of M.T. Lotz, LLC

Opinion

We have audited the accompanying financial statements of M.T. Lotz, LLC (the "Company"), which comprise the balance sheet as of December 31, 2022, and the related statements of Income, changes in member's equity (deficit), and cash flows for the year then ended, and the related notes to the financial statements.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of M.T. Lotz, LLC as of December 31, 2022, and the results of its operations and its cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of M.T. Lotz, LLC and to meet our other ethical responsibilities in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events considered in the aggregate that raise substantial doubt about M.T. Lotz, LLC's ability to continue as a going concern within one year after the date that the financial statements are available to be issued.

Auditor's Responsibilities for the Audit of Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from

fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of M.T. Lotz, LLC's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about M.T. Lotz, LLC's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control related matters that we identified during the audit.



Osama Hasan
Certified Public Accountant
License #08027
February 18, 2023

M.T. LOTZ, LLC
BALANCE SHEET
AS OF DECEMBER 31, 2022

FY-2022

CURRENT ASSETS

CASH

\$	-
\$	-

EQUITY AND LIABILITIES

INVESTMENT OF CAPITAL / PAID IN CAPITAL

RETAINED EARNINGS

\$	-
\$	-
\$	-

See accompanying notes to financial statements.

M.T. LOTZ, LLC
STATEMENT OF PROFIT AND LOSS
YEAR ENDED DECEMBER 31, 2022

FY-2022

SALES / REVENUE	
REVENUE / INCOME	\$ -
TOTAL INCOME	\$ -
GROSS PROFIT / (LOSS)	\$ -
OPERATING PROFIT / (LOSS)	\$ -
NET PROFIT / (LOSS)	\$ -

See accompanying notes to financial statements.

M.T. LOTZ, LLC
STATEMENT OF CASH FLOWS
YEAR ENDED DECEMBER 31, 2022

CASH AND CASH EQUIVALENTS, BEGINNING OF THE YEAR	\$	-
OPERATING ACTIVITIES		
NET INCOME	\$	-
CASH GENERATED BY OPERATING ACTIVITIES	\$	-
INVESTING ACTIVITIES		
CASH USED IN INVESTING ACTIVITIES	\$	-
FINANCING ACTIVITIES		
CASH USED IN FINANCING ACTIVITIES	\$	-
INCREASE / (DECREASE) IN CASH AND CASH EQUIVALENTS	\$	-
CASH AND CASH EQUIVALENTS, END OF YEAR	\$	-

See accompanying notes to financial statements.

M.T. Lotz, LLC (the “Company”)

**Notes to the Financial Statements
For the Year Ended December 31, 2022**

NOTE 1 - ORGANIZATION

M.T. Lotz, LLC was organized as a Florida Limited Liability Company on June 1, 2011. M.T. Lotz, LLC is a company that works in the Herbal Supplement and Manufacturing Industry to develop innovative GMP manufactured products.

The accompanying financial statements include a balance sheet as of December 31, 2022 and a profit and loss statement for the year ended December 31, 2022. The company is owned by James Morrisette (70%) and Christopher Mitchell (30%).

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting: The Company’s financial statements have been prepared in accordance with accounting principles generally accepted in the United States of America (“US GAAP”) as promulgated by the Financial Accounting Standards Board (“FASB”) through the Accounting Standards Codification (“ASC”) as the authoritative source in the preparation of financial statements. All balances are expressed in United States dollars (“USD” or “U.S. dollars”), the Company’s functional currency. The financial statements include the operations, assets, and liabilities of the Company. In the opinion of the Company’s management, the accompanying financial statements contain all adjustments necessary to fairly present the accompanying financial statements.

Use of Estimates: The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from the estimates.

Advertisement: The Company follows the policy of charging the costs of advertising to expense as incurred.

Property and Equipment: The Company values its investment in property and equipment at cost less accumulated depreciation. Depreciation is provided for using the straight-line method over the estimated service life of the assets being depreciated.

Cash and Cash Equivalent: Cash consists of cash on hand or deposit with the bank at December 31, 2022.

Investing Activities: Investing activities include making and collecting loans, purchasing and selling debt or equity instruments of other reporting entities, and acquiring and disposing of

See audited financial statements.

property, plant, and equipment and other productive assets used in the production of goods or services.

Financing Activities: Financing activities include borrowing money and repaying or settling the obligation and obtaining equity from owners and providing owners with a return on, or return of, their investment.

Income Taxes: For U.S. federal income tax purposes, taxes related to income earned by the company represent obligations of the individual partners and members and have not been reflected in the statement of financial condition. The stockholder is taxed on their proportionate share of the Company's taxable income. Accordingly, no provisions or liability for income taxes are included in these financial statements.

NOTE 3 - SUBSEQUENT EVENTS

We have performed an analysis of the activities and transactions subsequent to December 31, 2022 to determine the need for any adjustments to and/or disclosures within the financial statements as of and for the year ended December 31, 2022. We have performed such analysis through December 31, 2022, the date the financial statements were available to be issued.

NOTE 4 - NO ACTIVITY

There has been no financial activity for the year ended December 31, 2022.

SUBSECTION 4.12.2 – AVAILABLE FUNDING

Obtaining the Funding Needed

We have a comprehensive plan and strategy to obtain the funding needed to implement the operating plans we described in our responses to Subsection 4.4.1 (Cultivation Plan), 4.5.1 (Processing Plan), 4.6.1 (Dispensing Plan), and 4.7.1 (Premises Security) of this application. We estimate the funds required for our business plan and have already secured an amount exceeding our capital needs. Our letter of commitment and proof of funds are attached in the Addendum. Additionally, we do not have any pending lawsuits, outstanding judgments, or financial obligations that are listed as a “liability” in the certified financials.

An Estimate of the Funds Required for Each Phase

Using a detailed financial analysis and budgeting of our intended plan, we estimated the funds required for each phase of our business plan. This project requires approximately \$10.5 million in capital for use in funding license pursuit for and building out our MMTC operations in Florida. As demonstrated by our financial plan included below, this funding will provide the business with enough capital to reach the point of cash-flow positivity and leave us with a healthy cash cushion. We have developed a comprehensive financial plan to calculate the amount of funding needed to execute our business plan. Importantly, by developing this plan, we extended estimates to include robust sensitivity analysis of the key market assumptions. Our planning efforts include estimates of capital expenses, operating expenses, and personnel expenses, all based upon market analysis specific to Florida. All required licensing fees are included, along with fees for license renewal.

Cultivation Phase

For our cultivation phase, we estimate total capital expenditures of to be \$4.3 million to build out and start up our cultivation operations. Our existing building facility (25,375sf) located at 119.071(3)

119.071(3), which will be modified for cultivation operations, significantly reduces our need for more capital and enables us to start up the cultivation phase quickly.

Processing Phase

For our processing phase, we estimate total capital expenditures of \$903,950 consisting primarily of fixture, furniture and equipment needed to modify our existing owned building for our processing phase. Again, our owned existing building facility reduces our need for additional capital and will enable us to start up the processing phase in an expedited manner

Dispensing Phase

For our dispensing phase, we estimate total capital expenditures of \$3.3 million to build out and begin operating three dispensaries during the first two years of operations. Capital expenditures for each dispensary will total \$1.1 million and include primarily leasehold improvements and the purchase of required fixtures, furniture and equipment and security features to modify dispensing locations.

Security and Accountability

Security and accountability will encompass all security features and equipment, personnel as well as quality assurance and control, food safety, GMP, and inventory control and reporting. For our security and accountability, we estimate total expenses during the first two years of operation to be \$1.2 million.

Expansion Phase

Based on our projected profits, we will be able to fund our expansion plans in year 3 and will not require additional outside capital. Our excess funds of \$22.5 million put us in a comfortable position to buildout our cultivation facility with an additional 1,920 square feet of flowering canopy, or 5,687 square feet total, while still maintaining a 30% veg to flower canopy ratio with the initial veg canopy. This generates an additional 1,057lbs of marijuana per year at 50g/sf/harvest at 5 harvests/yr, increasing the total marijuana output to 3,131lbs/year. This would support adding an additional two dispensing facilities, with all 5 facilities receiving an adequate supply of more than 52lbs of marijuana flower/mo. This Expansion of the cultivation facility would cost \$576,000 at a cost of \$300/sf, and 2 dispensing locations would cost an estimated \$1.1 million each, for a total cost of \$2.7 million, bringing our minimum cash position to an estimated \$19.8 million in year 3.

Availability and Source of Funds for Each Phase

As detailed below, we will secure funding commitments that will not only support the capital development of the facility, but also supports startup operations necessary to bring the business to operating profitability, at which point the business will fund itself in perpetuity. In a scenario in which the market adoption rate is half of the anticipated rate, and remains far below that of Colorado, Washington, Nevada, and Oregon, we anticipate that there will still be enough demand in the Florida market to support our MMTC business, and that, even with a conservative estimate of demand, the business is projected to reach cash-flow positivity well before exhausting available capital.

As detailed in the attached Addendum to this subsection, we have secured available funding commitments of sufficient value to fund the startup operations of our MMTC facility until we

reach cash-flow positivity. Through careful analysis of our anticipated expenditures, we are confident this amount of financing will be appropriate to bring our business to market in Florida while allowing for a buffer to account for unforeseen circumstances.

Investment in Equipment, Technology, and Facilities

The above funding commitments provide us with significant capital to invest in equipment, inventory, technology, and facilities during the buildout process and in the first year of our operations. Our main capital investments will be designing and building out the facility, as well as Furniture, Fixtures, and Equipment (e.g., cultivation equipment, processing equipment, office furniture, Point-of-Sale system, inventory tracking system, security systems, vault, and inventory management technology).

Dedicated and Committed Funding / Obtaining Required Funding Upon Licensure

The funding sources described above and detailed on the attached Addendum have been dedicated and committed to this project as of the date of submission of this application.

Identification of Any Pending Lawsuits

We, the applicant, do not have any pending lawsuits.

Identification of Any Outstanding Judgments

We do not have any outstanding judgments that have not been satisfied by the applicant.

Financial Obligations

We, the applicant, do not have any “financial obligations, contingent or otherwise, that are not listed as a “liability” in the certified financials, including loans, notes, or any other debt that could be converted to ownership in the applicant. This includes options as described in the definition of “owner” in the Department’s Definitions Rule.

ATTACH IMAGES OF FUNDING SOURCES

April 24, 2023

Robert Raasch, Managing Member
Stigma Fund I, LLC
22422 Southerly Farms Blvd.
Edmond, OK 73025

Edgar J. Asebey, Esq.
Chief Executive Officer
Premier BioScience, LLC
730 NE 19th Place
Cape Coral, FL 33909

RE: LETTER OF INTENT

Dear Mr. Asebey:

I am pleased to provide you with this Letter of Intent ("LOI") expressing our interest in making available to Premier BioScience, LLC, a corporation in the state of Florida ("Company" or "Premier BioScience"), an amount not to exceed \$15,000,000.00 (fifteen million dollars) expressly conditioned upon, without limitation, the following:

- a) Premier BioScience being issued a license to participate in the Florida medical cannabis program
- b) The Parties reaching a mutual agreement regarding the final terms of a financing agreement and corresponding definitive legal documents; and
- c) Our underwriting and legal due diligence and investment committee approval

Execution of this LOI shall not obligate either party to accept any particular terms. This LOI is not a commitment to lend and is not binding on either party, except with respect to the Success Fee and Underwriting Fee. It is expressly agreed the form and content of a financing agreement must be mutually acceptable to both parties and their respective counsel, and that if a mutually acceptable financing agreement is not agreed to and executed by both parties, neither party shall have any further obligation to continue negotiating with the other.

The Parties agree that if the Company is issued a license to participate in the Florida medical cannabis program, then \$25,000 (the "Success Fee") shall be due and payable to us within 30 days of being awarded the license. Additionally, if the Company chooses not to close on a

commercially reasonable, market competitive loan with us, then \$75,000 (the "Underwriting Fee") shall be immediately due and payable to us and non-refundable under any circumstances. The Parties agree that the Underwriting Fee is not a penalty and is intended to provide reasonable compensation to us for our time and effort involved in conducting due diligence in connection with the potential financing described herein. The parties acknowledge and agree that the terms of the Success Fee and Underwriting Fee shall be a legally binding agreement between the parties hereto.

THE PARTIES CONSENT TO ANY STATE COURT OF COMPETENT JURISDICTION IN OKLAHOMA COUNTY, OKLAHOMA AS THE EXCLUSIVE VENUE, AND THE EXCLUSIVE USE OF OKLAHOMA LAW, FOR ANY DISPUTE ARISING OUT OF THIS LOI.

Accepted by: Stigma Fund I, LLC

By: 

Printed Name: Robert Raasch

Title: Managing Member/Authorized Representative

Date: April 24, 2023

Accepted by: Premier BioScience, LLC

By: 

Printed Name:

EDGAR J. ASEBEY

Title:

CEO.

Date:

4/27/2023

119.071(5)

April 17, 2023

Chicago Atlantic Group, LLC
420 N Wabash Avenue, Suite 500
Chicago, IL 60611

Edgar J. Asebey, Esq.
Chief Executive Officer
Premier BioScience, LLC
730 NE 19th Place
Cape Coral, FL 33909

RE: LETTER OF INTENT

Dear Mr. Asebey:

I am pleased to provide you with this Letter of Intent ("LOI") expressing our interest in making available to Premier BioScience, LLC, a corporation in the state of Florida ("Company" or "Premier BioScience") an amount not to exceed \$15,000,000.00 (fifteen million dollars) expressly conditioned upon, without limitation, the following:

- a) Premier BioScience being issued a license to participate in the Florida medical cannabis program;
- b) The Parties reaching mutual agreement regarding the final terms of a financing agreement and corresponding definitive legal documents; and
- c) Our underwriting and legal due diligence and investment committee approval.

Execution of this LOI shall not obligate either party to accept any particular terms. This LOI is not a commitment to lend and is not binding on either party, except with respect to the Success Fee and Underwriting Fee. It is expressly agreed the form and content of a financing agreement must be mutually acceptable to both parties and their respective counsel and that if a mutually acceptable financing agreement is not agreed to and executed by both parties, neither party shall have any further obligation to continue negotiating with the other.

Chicago Atlantic Group is a credit oriented investment platform that has closed over \$1.8 billion in credit facilities since 2019. The Chicago Atlantic platform includes multiple funding sources including private funds, co-lender syndicates, participations as well as a public mortgage real estate investment trust ("REIT"). Chicago Atlantic Real Estate Finance, Inc. (NASDAQ: REFI) is a market-leading mortgage REIT utilizing significant real estate, credit and cannabis expertise to originate senior secured loans primarily to state-licensed cannabis operators in limited-license states in the United States. REFI is part of the Chicago Atlantic platform, which has over 40 employees and has deployed over \$1.8 billion across more than 50 loans. The Chicago Atlantic

platform recently lead and served as administrative agent for a new, four-year \$350 million facility for a large multi-state operator. Chicago Atlantic has the capacity and intent to make \$15 million available to Premier BioScience subject to the conditions outlined in this letter.

The parties agree that if the Company is issued a license to participate in the Florida medical cannabis program then \$25,000 (the "Success Fee") shall be due and payable to us within 30 days of being awarded the license. Additionally, if the Company chooses not to close on a commercially reasonable, market competitive loan with us, then \$75,000 (the "Underwriting Fee") shall be immediately due and payable to us and non-refundable under any circumstances. The parties agree that the Underwriting Fee is not a penalty and is intended to provide reasonable compensation to us for our time and effort involved in conducting due diligence in connection with the potential financing described herein. The parties acknowledge and agree that the terms of the Success Fee and Underwriting Fee shall be a legally binding agreement between the parties hereto.

THE PARTIES CONSENT TO ANY STATE COURT OF COMPETENT JURISDICTION IN COOK COUNTY, ILLINOIS AS THE EXCLUSIVE VENUE, AND THE EXCLUSIVE USE OF ILLINOIS LAW, FOR ANY DISPUTE ARISING OUT OF THIS LOI.

Sincerely,

Accepted by: Chicago Atlantic Group
By: thomas miles
Printed Name: Thomas Miles
Its: Authorized Signer
Date: April 18, 2023

Accepted by Premier BioScience, LLC
By: Edgar J. Aschey
Printed Name: Edgar J. Aschey, Esq
Its: CEO
Date: April 18, 2023

LETTER OF ATTESTATION

Date: 4/26/2023

Bank Name: PNC Bank

Bank Address: 16740 San Carlos Blvd, Fort Myers, FL 33908

Bank Phone: (239) 437-4743

Account Number: 1271167448

Guaranteed Balance: \$2,423,348.54

I, Jim Morrisette, CEO of Premier Manufacturing Products and owner of the referenced account, do hereby certify that the above information and included Account Balance document from PNC is true and correct.



(Signature)



(Print Name)



(Title)

FLORIDA INDIVIDUAL ACKNOWLEDGMENT
F.S. 117.05(13)

State of Florida

County of LEE

The foregoing instrument was acknowledged before
me by means of

☒ Physical Presence,

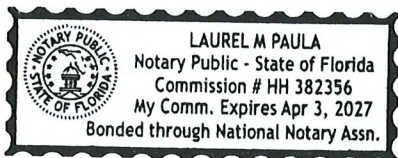
— OR —

☐ Online Notarization,

this 26TH day of APRIL, 2023, by
Date Month Year

JAMES MORRISSETTE

Name of Person Acknowledging



Laurel M Paula

Signature of Notary Public — State of Florida

LAUREL M PAULA

Name of Notary Typed, Printed or Stamped

☒ Personally known

☒ Produced Identification

Type of Identification Produced: FLORIDA DL

Place Notary Seal Stamp Above

OPTIONAL

Completing this information can deter alteration of the document or
fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: LETTER OF ATTESTATION

Document Date: APRIL 26, 2023 Number of Pages: 1

Signer(s) Other Than Named Above: _____

Custom Current Day Balance Report - Premier Manufacturing Products Balance



Current Business Day: April 26, 2023

04/26/2023 01:16:27 PM

Account Nbr	Account Name	Current Available
119.071(5)	PREMIER MANUFACTURING PRODUCTS	2,423,348.54

This report includes items received today but not yet posted. They are subject to verification and adjustment.

Subsection 4.12.3 Projected Financial Budget

Our Medical Marijuana Treatment Center (“MMTC”) will require a projected financial budget for the first two years after licensure of approximately \$10.52 million. This budget has been extrapolated from dozens of key indicators such as, but not limited to; personnel salaries; furniture, fixtures, and equipment (FFE); marketing; professional services; renovations; buildout and maintenance of facilities; and, licensure fees. We have developed a comprehensive financial model to calculate the amount of funding needed to execute our plan. Our approach to financial modeling includes robust sensitivity analysis of the key forecasting assumptions. Although we have settled on projections we consider to be the most likely market conditions, by examining numerous market scenarios with our financial model (by varying factors such as adoption rates and purchase volumes over time), we were able to "stress test" the underlying key forecasting assumptions. This process was undertaken to reveal critical information on how the business may look under varying market realities, so that we will be prepared for any eventual market outcome. As detailed in the Sources and Uses of Funds table, we have secured funding commitments that not only exceed the amount necessary to support the capital development of our facility, but also support startup operations necessary to bring the business to operating profitability, at which point the business will fund itself.

In addition, we project our operations will result in roughly \$20.6 million in Net Sales in the first two years, which will continue to fund our operations and expansion. Our detailed two-year projected budget, which is consistent with our responses to Subsections 4.4.1, 4.5.1, 4.6.1, and 4.7.1, is located in the Addendum.

Subsection 4.4.1 Cultivation Plan Budget

We have constructed a plan for cultivating marijuana which follows all applicable laws and specifically section 381.986(8). Upon license approval from the Florida Department of Health Office of Medical Marijuana Use (“the Department”), we will compliantly implement our plans to become a fully operational MMTC, and as part of our operations, we will cultivate marijuana for medical use. 381.986(8)(e); 381.986(8)(e)(6). We have accounted for all costs associated with our cultivation operations in our projected budget plans. These include, but are not limited to: buildout of designated cultivation rooms; plant care such as a drip irrigation system; personal protection equipment (“PPE”); sanitation and waste disposal practices; labor; and, equipment and tools such as lighting, rolling racks and environmental control systems. 64-4.002(2)(c)(5)(c). Based on our facility size of 25,375 square feet and initial canopy area of 4,480 square feet, we expect to cultivate 2,467 pounds of marijuana on an annual basis based on 50g/sf/harvest and 5 harvests/year. 64-4.002(2)(c)(5)(a). The ability and necessity to cultivate this amount of marijuana and associated costs will require a capital budget of approximately \$4.3 million for cultivation-related purposes.

Subsection 4.5.1 Processing Plan Budget

Our team will process marijuana in accordance with the requirements of section 381.986(8) and Department Rules. We have accounted for the costs associated with processing marijuana into finished products in our projected budget plans. These include but are not limited to: extraction tools, processes, and extraction equipment; chemical storage facilities; testing equipment and quality controls; record maintenance and inventory control; quality assurance procedures; packaging and labeling; and sanitation and waste disposal practices. 381.986(8)(e)(11)(b); 64ER21-13; 64ER20-39; 64-4.207. Based on the parameters as outlined above regarding the

square footage of our center, our equipment and methodologies, and the amount of marijuana we will process, we will require a capital budget of approximately \$903,950 for processing purposes.

Subsection 4.6.1 Dispensing Plan Budget

Our plan for dispensing will comply with section 381.986(8) and Department rules. As such, all processed marijuana will be tested by a medical marijuana testing laboratory before it is dispensed. 381.986(8)(e)(11)(d). Product offerings will include flower; pre-rolled marijuana cigarettes; extracts (concentrates) available in various receptacles including vaporizer cartridges, cannabis syringes, jars, and/or child resistant bags; derivative products, including edible derivative products; tinctures; inhalers; sprays; capsules; distillates; non-oral transmucosal products; topicals; and, transdermals. Our pre-rolled joints will not be wrapped with paper made with tobacco or hemp. 381.986(8)(e)(10). In our financial planning for dispensing, we consider budgeting-related matters that include, but are not limited to: ensuring adequate supply to meet the needs of proposed facilities; addressing constraints related to hours of operation; complying with state requirements for delivery methods, including home delivery services; developing patient education and marketing materials; implementing security measures to protect patient confidentiality information, such as using up-to-date computer software and physical security measures; and a system for documenting and investigating patients' complaints and adverse incidents. 381.986(8)(f)(4); 381.986(8)(g); 381.986(8)(e)(12); 381.986(8)(h); 64-4.009(3). Based on our dispensing plan and the requirements outlined by the State of Florida, we anticipate our dispensing capital budget plan will be approximately \$3.3 million. This is in line and consistent with our overall budget projections over the first two years. We have assessed our budget constraints up to five-years out from start of operation although we have included only 2 years at the Department's

request, however, we feel confident the budget allocated for our dispensing operations is achievable and consistent with our overall budget.

Subsection 4.7.1 Premises Security Budget

We will maintain the safety and security of the premises where cultivation, processing, storing, or dispensing of marijuana occurs. This includes implementing superior controls against the diversion, theft, and loss of marijuana or marijuana delivery devices into our plan. 381.986(8)(f). This will include a myriad of security features, such as the installation and creation of secure marijuana product vaults, emergency management plans, infrastructure security, a video surveillance system, an alarm system, , and creating a secure workplace environment. To accomplish this, we have allocated \$1.2 million from our overall 2yr budget for security expenditures. These specific funds will be used to facilitate the storage of marijuana in secured, locked rooms and vaults; having at least two employees, or employees of a security agency which we contract with, to always be on the premises where we store marijuana; maintaining all marijuana storage in air-tight, lockable, sealable containers; and, allowing safety precautions and procedures to be installed to address any emergencies which may arise in a workplace. 381.986(8)(f); 64-4.207(3)(d)(1)-(3); 64-4.002(2)(d)(4); 29 C.F.R. 1910.38(a).

Addendum

Supply as an addendum a projected two-year operating budget for the proposed MMTC and projected income statements for the first two years after licensure in chart format.

Projected Two-Year Operating Budget

Source of Funds

	Pre- Operations	First Year of Operations	Second Year of Operations	Total
Source				
Equity				
Founders' Equity Contributions	-			-
Total Equity	-			-
Product Sales				
Dry Flower (includes prerolls)		3,377,209	9,232,948	12,610,157
Vape Cartridges (Low THC, High THC, 1:1 Ratio)		675,442	1,846,590	2,522,031
Concentrates (Low THC, High THC, 1:1 Ratio)		562,868	1,538,825	2,101,693
Oral Syringes (Low THC, High THC, 1:1 Ratio)		-	-	-
Tinctures (Low THC, High THC, 1:1 Ratio)		56,287	153,882	210,169
Topicals (Low THC, High THC, 1:1 Ratio)		56,583	153,882	210,465
Capsules (Low THC, High THC, 1:1 Ratio)		56,287	153,882	210,169
Edibles (Low THC, High THC, 1:1 Ratio)		844,302	2,308,237	3,152,539
Compassionate Need Program Discounts		(112,580)	(307,765)	(420,344)
Net Sales		5,516,398	15,080,481	20,596,879
Total Sources of Funds	-	5,516,398	15,080,481	20,596,879

Use of Funds

	Pre- Operations	First Year of Operations	Second Year of Operations	Total
Product Inventory		375,000	200,000	575,000
New Fixed Assets Purchases				
Leasehold Improvements:				
Headhouse Leasehold Improvements	3,600,000			3,600,000
Greenhouse Leasehold Improvements	-			-
3-Phase Power Connection	100,000			100,000
Development Costs (Architect, Engineering, etc)	39,200			39,200
Startup Services	92,635			92,635
Landlord Allowance for Tenant Improvements	-			-
Net Leasehold Improvements	3,831,835			3,831,835
Security Equipment & Fencing	100,000			100,000
Industrial Backup Power Generator	125,000			125,000
Cultivation Furniture, Fixtures & Equipment	30			30
Processing Furniture, Fixtures & Equipment:				
Extraction Equipment & Install	150,000			150,000
Distillation Equipment & Install	-			-
Misc Manufacturing Equipment & Install	215,000			215,000
Roll Pros preroll automation	250,000			250,000
Kitchen Equipment & Install	50,000			50,000
Total Fixed Assets	4,721,865	-	-	4,721,865

Cost of Goods Sold and Operating Expenses

Personnel:				
Salaries & Wages	199,167	2,963,333	4,599,454	7,761,954
Payroll Taxes & Benefits	55,169	820,843	1,274,049	2,150,061
Total Personnel	254,336	3,784,177	5,873,503	9,912,015
Product Packaging and Ingredients		491,681	1,420,239	1,911,920
Advertising & Marketing	20,300	69,700	137,594	227,594
Auto / Vehicle Expenses		75,059	98,574	173,633
Bank & Merchant Fees		60,000	61,200	121,200
Community Charitable Giving		8,500	18,170	26,670
Dues & Subscriptions		3,200	4,858	8,058
Facilities		173,200	283,064	456,264
Cultivation & Processing Supplies		183,332	183,723	367,055
Insurance & Bonding	113,500	242,550	259,501	615,551
Legal & Professional Fees	218,500	277,500	309,240	805,240
Licenses / Permits / Fees	60,830	60,063	60,063	180,956
Miscellaneous	7,500	28,000	30,410	65,910
Office Expenses & Supplies	-	9,550	16,391	25,941
Product Testing, Third-Party	-	30,000	61,200	91,200
Public Safety & Substance Abuse Plan	-	12,000	12,240	24,240
Telephone & IT/IS	-	29,450	57,589	87,039
Security System Monitoring & Maintenance	-	16,650	25,533	42,183
Training Programs, Continuing Education	75,000	39,750	12,145	126,895
Travel & Meals	-	10,250	15,205	25,455
Utilities	-	183,842	207,114	390,957
Total COGS and Operating Expenses	749,966	5,788,454	9,147,556	15,685,976
Allowance for Income Taxes incl. impact of IRC § 280E		349,072	2,124,170	2,473,242
Total Use of Funds	5,471,830	6,512,526	11,471,726	23,456,082
Period Excess Funds	(5,471,830)	(996,127)	3,608,755	(2,859,203)
Period Minimum Cash Position	26,478,170	21,883,753	22,494,813	
Year-End Cash Position	(5,471,830)	(6,467,958)	(2,859,203)	

Projected Two-Year Income Statement

	Pre-Operational Totals	Year 1 Totals	Year 2 Totals
Sales			
Dry Flower (includes prerolls)		3,377,209	9,232,948
Vape Cartridges (Low THC, High THC, 1:1 Ratio)		675,442	1,846,590
Concentrates (Low THC, High THC, 1:1 Ratio)		562,868	1,538,825
Oral Syringes (Low THC, High THC, 1:1 Ratio)		-	-
Tinctures (Low THC, High THC, 1:1 Ratio)		56,287	153,882
Topicals (Low THC, High THC, 1:1 Ratio)		56,583	153,882
Capsules (Low THC, High THC, 1:1 Ratio)		56,287	153,882
Edibles (Low THC, High THC, 1:1 Ratio)		844,302	2,308,237
Additional Product from Wet Plant		-	-
Accessories / Merchandise		-	-
Total Sales		5,628,978	15,388,246
Sales Discounts			
Compassionate Need Program		112,580	307,765
Total Sales Discounts		112,580	307,765
Total Net Sales		5,516,398	15,080,481
Cost of Sales			
Excise or Gross Receipts Taxes	-	-	-
Dry Flower (includes prerolls)	-	263,844	762,159
Vape Cartridges (Low THC, High THC, 1:1 Ratio)	-	50,202	145,016
Concentrates (Low THC, High THC, 1:1 Ratio)	-	51,596	149,044
Oral Syringes (Low THC, High THC, 1:1 Ratio)	-	-	-
Tinctures (Low THC, High THC, 1:1 Ratio)	-	2,412	6,968
Topicals (Low THC, High THC, 1:1 Ratio)	-	4,244	12,195
Capsules (Low THC, High THC, 1:1 Ratio)	-	1,941	5,607
Edibles (Low THC, High THC, 1:1 Ratio)	-	112,574	325,188
Additional Product from Wet Plant	-	-	-
Accessories / Merchandise	-	-	-
Inventory Spoilage	-	4,868	14,062
Adjustment: Salaries & OpEx Classifiable as COGS	-	3,442,902	5,022,757
Total Cost of Sales	-	3,934,583	6,442,995
Gross Profit	-	1,581,815	8,637,486
Salaries and Wages			
Production & Corporate Salaries and Wages	199,167	1,882,000	2,229,092
Production & Corporate Payroll Taxes and Benefits	55,169	521,314	617,458
Dispensary Aggregate Salaries and Wages	-	1,081,333	2,370,363
Dispensary Aggregate Personnel Payroll Taxes and Benefits	-	299,529	656,590
Total Salary and Wages	254,336	3,784,177	5,873,503
Fixed Business Expenses			
Advertising & Marketing	20,300	69,700	137,594
Auto / Vehicle Expenses	-	75,059	98,574
Bank & Merchant Fees	-	60,000	61,200
Community Charitable Giving	-	8,500	18,170
Dues & Subscriptions	-	3,200	4,858
Facilities	-	173,200	283,064
Cultivation & Processing Supplies	-	183,332	183,723
Insurance & Bonding	113,500	242,550	259,501
Legal & Professional Fees	218,500	277,500	309,240
Licenses / Permits / Fees	60,830	60,063	60,063
Miscellaneous	7,500	28,000	30,410
Office Expenses & Supplies	-	9,550	16,391
Product Testing, Third-Party	-	30,000	61,200
Public Safety & Substance Abuse Plan	-	12,000	12,240
Telephone & IT/IS	-	29,450	57,589
[Additional Expense Category]	-	-	-
Security System Monitoring & Maintenance	-	16,650	25,533
Training Programs, Continuing Education	75,000	39,750	12,145
Travel & Meals	-	10,250	15,205
Utilities	-	183,842	207,114
Shared Corporate Overhead	-	-	-
Total Fixed Operating Expenses	495,630	1,512,596	1,853,815
Adjustment: Salaries & OpEx Classifiable as COGS	-	(3,442,902)	(5,022,757)
Total Operating Expenses	749,966	1,853,870	2,704,561
EBITDA	(749,966)	(272,056)	5,932,925
Other Expenses			
Amortized Start-up Expenses	-	-	-
Depreciation	-	264,563	621,750
Interest	-	-	-
Allowance for Income Taxes (in the absence of §280E)	-	-	1,265,257
Total Interest, Regular Income Taxes, Deprec., Amort.	-	264,563	1,887,008
Net Income, under Regular Income Taxes	(749,966)	(536,619)	4,045,917
Additional Income Tax Allowance due to §280E	-	349,072	858,913
Net Income after Additional Tax Allowance, due to §280E	(749,966)	(885,690)	3,187,005

Subsection 4.13.1 Ownership Information for Individual (Natural Person) Applicants

This section does not apply to Applicant since applicant is an entity, not a natural person.

Subsection 4.13.2 – Ownership Information for Individual Entity Applicants (requested

documents and information only)

Subsection 4.13.2 – Ownership Information for Entity Applicants

a. Members	b. % of Ownership Interest
James Morrissette	35%
Edgar Asebey	20%
Christopher Mitchell	15%
Sean Carriger	10%
Richard Gunnels	10%
Robert Velarde	5%
Reserved	5%
TOTAL	100%

c. Business Corporate Address

Premier BioScience, LLC

730 NE 19th Place

Cape Coral, FL 33909

d. Taxpayer Identification Number

EIN: 45-4793009

e. The Applicant does not currently have a partnership agreement, joint venture agreement, operating agreements, shareholder agreements or buy/sell agreements.

4.13.3 Capitalization Tables, Change of Control, and Related Entities

a. Below is a fully diluted capitalization table listing all share types and the aggregate sum of shares associated with or flowing to any natural persons, whether considered owners or investors.

Members	Ownership Interest	Membership Units
James Morrisette	35%	35
Edgar Asebey	20%	20
Christopher Mitchell	15%	15
Sean Carriger	10%	10
Richard Gunnels	10%	10
Robert Velarde	5%	5
Reserved	5%	5
TOTAL	100%	100

All the natural person owners are listed on the capitalization table above. There are no natural person beneficiaries related to any of the owners of Applicant company. 731.21 F.S.

b. Applicant is not a publicly traded company.

c. Applicant recently had a change of ownership. This change is reflected in the Annual Report that was filed with the Florida Secretary of State by Applicant on April 14, 2023 and which is attached hereto.

d. There are no entities related to Applicant (i.e. parent companies, subsidiaries, affiliates, etc.)

4.15 Citrus Preference Documentation

Applicant does NOT seek to qualify for the Citrus preference. 381.986(8)(a)3, F.S.

4.16 *Pigford*/BFL Application Fee Transfer Request

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