Medical Marijuana Dispensary Permit Application

You may apply for one dispensary permit in this application for any of the medical marijuana regions listed below. A separate application must be submitted for each primary dispensary location sought by the applicant. Please see the Medical Marijuana Organization Permit Application Instructions for a table of the counties within each medical marijuana region and the counties in which you are eligible to locate your primary dispensary.

Please check to indicate the medical marijuana region, and specify the county, for which you are applying for a dispensary permit:

☐ Northwest
☐ Southwestern
☐ Northeast
☒ Southeast

County 1 (Primary Dispensary Location): Philadelphia
County 2 (if applicable):
County 3 (if applicable):
Medical Marijuana Dispensary Permit Application

Part A - Applicant Identification and Dispensary Information

(Scoring Method: Pass/Fail)

FOR THIS PART, THE APPLICANT IS REQUIRED TO PROVIDE BACKGROUND AND CONTACT INFORMATION FOR THE BUSINESS OR INDIVIDUAL APPLYING FOR A DISPENSARY PERMIT, THE PRIMARY DISPENSARY LOCATION, ALONG WITH ANY SECOND OR THIRD DISPENSARY LOCATIONS THAT ARE BEING SOUGHT UNDER THE APPLICATION.

Section 1 – Applicant Name, Address and Contact Information

Business or Individual Name and Principal Address

Business Name, as it appears on the applicant’s certificate of incorporation, charter, bylaws, partnership agreement or other legal business formation documents:

PennStar Medical LLC

Other trade names and DBA (doing business as) names:

Business Address: 255 S. 17 Street, 20 Floor
City: Philadelphia State: PA Zip Code: 19103
Phone: (410) 926-7066 Fax: Email: DOH REDACTED

☑ Primary Contact, or ☐ Registered Agent for this Application

Section 2 – Dispensary Information

THE APPLICANT IS REQUIRED TO PROVIDE A PRIMARY DISPENSARY LOCATION. THE APPLICANT MAY INCLUDE A SECOND OR THIRD LOCATION UNDER THIS APPLICATION. A SECOND OR THIRD DISPENSARY MAY BE ADDED TO A DISPENSARY PERMIT AT A LATER DATE THROUGH THE FILING OF AN APPLICATION FOR ADDITIONAL DISPENSARY LOCATIONS.

By checking “Yes,” you affirm that you possess the ability to obtain in an expeditious manner the right to use sufficient land, buildings and other premises and equipment to properly carry on the activity described in the medical marijuana dispensary permit application, and any proposed location for a dispensary.

☑ Yes ☐ No

Primary Dispensary Location (please indicate dispensary name as you would like it to appear on the dispensary permit)
Public Transit Access
The dispensary is situated perfectly in reference to Philadelphia’s public transit options. The Market-Frankford Line (MFL), one of Philadelphia’s two subway lines, has a stop approximately three blocks from the dispensary. The MFL’s entire line runs from the far western reaches of the city to the far northeast neighborhoods, providing easy, affordable, quick access to the entire city.

Beyond the subway, the dispensary location is also serviced by several bus routes, including Route 43 that runs east to west along the length of Spring Garden Street and neighborhoods north along the Delaware River. Bus Routes 5 and 57 travel a route that goes north on 3rd Street, directly next to the dispensary, and south on 4th Street, one block away from the property.

Second Dispensary Location

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PLEASE PROVIDE A DESCRIPTION OF THE PUBLIC ACCESS TO THE DISPENSARY LOCATION, INCLUDING ANY LOCAL PUBLIC TRANSPORTATION THAT MAY BE AVAILABLE:

Please limit your response to no more than 5,000 words.

Third Dispensary Location

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**Pennsylvania Department of Health**  
**Medical Marijuana Dispensary Permit Application**

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**Part B – Diversity Plan**  
**(Scoring Method: 100 Points)**

In accordance with section 615 of the Act (35 P.S. § 10231.615), an applicant shall include with its application a diversity plan that promotes and ensures the involvement of diverse participants and diverse groups in ownership, management, employment, and contracting opportunities. Diverse participants include a person, including a natural person; individuals from diverse racial, ethnic and cultural backgrounds and communities; women; veterans; individuals with disabilities; corporation; partnership; association; trust or other entity; or any combination thereof, who are seeking a permit issued by the Department of Health to grow and process or dispense medical marijuana. Diverse groups include the following businesses that have been certified by a third-party certifying organization: a disadvantaged business, minority-owned business, and women-owned business as those terms are defined in 74 Pa. C.S. § 303(b); and a service-disabled veteran-owned small business or veteran-owned small business as those terms are defined in 51 Pa. C.S. § 9601.

**Section 3 – Diversity Plan**

By checking “Yes,” the applicant affirms that it has a diversity plan that establishes a goal of opportunity and access in employment and contracting by the medical marijuana organization. The applicant also affirms that it will make a good faith effort to meet the diversity goals outlined in the diversity plan. Changes to the diversity plan must be approved by the Department of Health in writing.

The applicant further agrees to report participation level and involvement of Diverse Participants and Diverse Groups in the form and frequency required by the Department, and to provide any other information the Department deems appropriate regarding ownership, management, employment, and contracting opportunities by Diverse Participants and Diverse Groups.

**DIVERSITY PLAN**

In narrative form below, describe a plan that establishes a goal of diversity in ownership, management, employment and contracting to ensure that diverse participants and diverse groups are accorded equality of opportunity. To the extent available, include the following:
1. The diversity status of the Principals, Operators, Financial Backers, and Employees of the Medical Marijuana Organization.
2. An official affirmative action plan for the Medical Marijuana Organization.
3. Internal diversity goals adopted by the Medical Marijuana Organization.
4. A plan for diversity-oriented outreach or events the Medical Marijuana Organization will conduct during the term of the permit.
5. Contracts with diverse groups and the expected percentage and dollar amount of revenues that will be paid to the diverse groups.
6. Any materials from the Medical Marijuana Organization’s mentoring, training, or professional development programs for diverse groups.
7. Any other information that demonstrates the Medical Marijuana Organization’s commitment to diversity practices.
8. A workforce utilization report including the following information for each job category within the Medical Marijuana Organization:
   a. The total number of persons employed in each job category,
   b. The total number of men employed in each job category,
   c. The total number of women employed in each job category,
   d. The total number of veterans in each job category,
   e. The total number of service-disabled veterans in each job category, and
   f. The total number of members of each racial minority employed in each job category.
9. A narrative description of your ability to record and report on the components of the diversity plan.

Part I: PennStar Medical, Diverse from the Outset

The legal marijuana industry is booming, and businesses are cashing in. Dispensaries alone raked in billions of dollars last year. Experts estimate the legal marijuana industry will bring in $10.8 billion in total sales by 2019. But one group is being shut out of this industry—African-Americans. African Americans have been underrepresented in the cannabis industry to date, and factors like socioeconomics, the high cost of starting and keeping a cannabis business running, and America’s history of handing down unduly harsh sentences to people of color involved in marijuana violations over the past several decades are still hindering participation. According to the American Civil Liberties Union, there were 8.2 million marijuana arrests over the nine years from 2001 to 2010, and 88% of those were for simple possession of marijuana—African Americans are nearly four times as likely to be arrested for marijuana than caucasians, even though caucasians use marijuana at roughly the same rate. These barriers help explain the reticence or inability of many people of color to participate in the U.S. cannabis industry.

Recent studies have found that only around 1% of the cannabis dispensaries nationwide are owned by African Americans. More importantly, there are hardly any cultivation centers or extraction/processing businesses that are owned and managed by minority entrepreneurs. This leaves an enormous gap in lost opportunity for minorities in the nation’s fastest growing and most promising industry. This dynamic is particularly alarming because the cannabis industry
is not one of those traditional businesses where you must be grandfathered in—a particularly acute problem for minorities due to the past history of racial discrimination in the United States.

“We see yet another lucrative industry growing without almost no input from our community—another table we are not invited to sit at,” the NAACP’s Rev. Amos Brown wrote in a letter to city councilors. “It’s particularly invasive given the fact that enforcement of marijuana laws have historically been biased against people of color.”

“People of color have bore the disproportionate brunt of the war on drugs and should disproportionately benefit from legalization,” Bill Piper, senior director of the DPA’s office of national affairs, told Fortune. “If we don't break open the market now and get people of color in, it’s going to be even harder a few years from now when the industry is bigger and stronger.”

“It’s not doom and gloom,” said Jeanette Ward, an executive at the marijuana software firm MJ Freeway and co-chairwoman of the Minority Cannabis Business Association. “We think people want more diversity, they just don’t know what to do or how to make it happen.” The Commonwealth of Pennsylvania seems to know how to make it happen—by making diversity and inclusion a very important part of the application. The agenda is big, but so is the potential payoff. Greater wealth, and greater access to wealth in those communities that feel most alienated from our economic system, are central to our nation’s prosperity and stability, and to the promise of opportunity that Americans hold dear.

According to the Aspen Institute “Much of the recent coverage of the widening inequality gap in the US has focused on the growing disparity in incomes, independent of race factors. But looking across racial lines in the U.S., the differences in wealth are stark. The Federal Reserve Board of St. Louis has done important work analyzing the balance sheets and wealth of U.S. households. In 2013, it found that the net worth of Latino families was one-tenth that of non-Latino white households—and the net worth of African Americans was even lower.”

Ownership and Management of Business Assets
Digging deeper, the research by the Aspen Institute found that one reason for the gap in wealth levels among African Americans and Latinos was that they held dramatically lower levels of business and financial assets—assets instrumental to providing greater diversification and higher rates of growth over time.

The most important factor is ownership and control of businesses and business assets. A Minority Business Enterprise (MBE) is defined as a business that is at least 51% owned, operated and controlled on a daily basis by one or more (in combination) American citizens of the following ethnic minority and/or gender (e.g. woman-owned) and/or military veteran classifications:

1. African American;
2. Asian American (includes West Asian Americans (India, etc.) and East Asian Americans (Japan, Korea, etc));
3. Hispanic American - Persons with origins from Latin America, South America, Portugal and Spain;

4. Native American including Aleuts;

5. Service-Disabled Veteran Owned, which became a federally certified classification in 1999, subsequent to the passage legislation by the United States Congress through the enactment of The Veterans Entrepreneurship and Small Business Act of 1999.

In order for Pennsylvania to maximize its objective of diversity, the single most important factor to be considered is minority ownership and control, meaning a business that is at least 51% owned by minorities. The extent of the disparity of ownership by African Americans as pointed out above must be corrected. True diversity means ownership and control. The following are nice to have but don’t add up to full diversity: less-than-majority (51%) ethnic ownership of an applicant’s company shares; jobs; training programs; and subcontracting. As ComfyTree aptly said “we do not believe in the illusion of inclusion.” Since the application assigns substantial points to diversity, all applicants will submit diversity plans with hiring and training programs, management development programs, subcontracting programs, and the like. Most will also come forth with minority equity partners and managers but none of these minorities will control the assets and operations of the applicant’s firm.

A minority owned firm does not need a management sensitivity training program or a concerted outreach program. They will naturally hire from their community. There will be no glass ceiling to management—they are the management. And most importantly, they will control and benefit from the wealth generated by the firm, which in turn will benefit the community in which they live.

PennStar, Minority Owned and Operated Business Enterprise
PennStar Medical, LLC is a minority-owned business enterprise (MBE). Currently, it is one hundred percent (100%) owned by ethnic minorities—a dynamic combination of African American (70%), Asian American (20%), and Hispanic Americans (10%).

The minority ownership of the Class A stock units of PennStar is as follows:

It is also important to note that 100% of the capital needed to launch PennStar Medical, LLC was provided by minority investors.

Corporate Control and Management
Not only is PennStar minority owned, but it is also controlled by minorities and managed by minority executives.
Board of Directors
Currently the board of directors for PennStar consists of five members all of whom are minorities. Darryl Hill serves as Chairman of the Board of Directors. Since the majority of the class units of the LLC are held by shareholders who are ethnic minorities control of the board will always be maintained. The corporate affairs of PennStar are absolutely controlled by minorities. That is diversity at its best.

Top Management
PennStar has a critical element that most companies don’t have—complete and absolute management control by minorities. It is not necessary for PennStar to design special programs to ensure diversity in management—it’s built in. PennStar’s minority managers are exceptional, experienced businessmen who are both leaders and developers of managerial talent. These managers are not résumés inserted for the purpose of this application, but are investors and shareholders who have a vested interest in the success of the company. Having partners run the company bodes well for continuity and long term management excellence.

The following positions are all filled by minorities:

Technical Management
PennStar has joined forces with some of the best cannabis companies in the nation. These outstanding technical partners bring to PennStar dozens of years of technical expertise and experience. The PennStar partners include:

While these technical partners have no financial interest in the company, they bring a very important element to the PennStar effort: the training of top operational and technical managers. As mentioned, to date minorities have had little to do with managing and owning cannabis companies. Therefore, few experienced cannabis managers and cannabis technicians are available in the minority labor pool. PennStar will begin to fill that void not only with its own managers but also with its Cannabis Institute, an initiative to develop and train managers and technicians for the broader cannabis industry.

Training
The PennStar technical partners play a critical role in the development of the company’s facilities and operations, including staff training and development. They will set and initially manage the company’s business components, while in the process thereof, training PennStar
staff and management. Over time, the partners will be phased out, leaving PennStar a minority owned, managed, and operated enterprise.

**Darryl Hill—Diversity Pioneer**
PennStar is led by Darryl Hill, a national icon in diversity under whose leadership diversity and inclusion is a primary company principal. Mr. Hill’s life and business career has been dedicated to creating equal opportunity for African Americans and other ethnic minorities in our country. Nicknamed “The Jackie Robinson of College Sports,” Mr. Hill began his groundbreaking efforts in high school and has continued his work for equality and economic parity up through his current venture, seeking to correct the racial inequity that exists in the cannabis industry. Mr. Hill has put together an exceptional entity designed to break into the closed ranks of marijuana cultivation and sales. He has wedded the best of cannabis technical capability with the best of minority leadership and capital from the minority community to create a formidable applicant for a Pennsylvania medical marijuana permit.

Darryl Hill has been a groundbreaker in sports and business as well, and in addition to his achievements on the playing field, is also a brilliant entrepreneur who has organized, financed, and operated businesses worldwide. Equally important is the fact that Mr. Hill was a pioneer in formulating the movement for diversity in business—he helped write Section 8(A) of the Small Business Investment Act, which calls for special efforts by the federal government to support minority business and contracting.

**Sports Groundbreaker**
Darryl Hill is a sports pioneer who was the first African American to play sports at his high school and at two different universities. He is known as the Jackie Robinson of college sports, because he was the first African American to play major college football in the south, and he was the first scholarship Black athlete to play varsity sports for a major southern university.

**Diversity Groundbreaker**
Mr. Hill is an intrepid visionary who has achieved remarkable firsts in all walks of life. He has been a relentless champion for minorities and others that have been denied full access to opportunity, and a pathfinder for all who seek success with barriers to climb. Some of Mr. Hill’s achievements include:

- First Black academic scholarship holder and first Black football player at Gonzaga College HS
- First Black football player at a US Military Academy—USNA
- First Black Football player at the University of Maryland and in the Atlantic Coast Conference
- First Black scholarship athlete in any sport at any major college in the Deep South—Known as the Jackie Robinson of college sports
- Early advocate for business and economic development for minorities and assisted over 2,500 businesses
- Founded the first publicly-held Minority Small Business Investment Company.
- First Chairman of the National Supplier Diversity Council
• In 1982, founded one of the first green and sustainable energy companies—Pacific Energy Corporation d/b/a Intelfac (Intelligent Facilities)
• One of the first independent American businessmen to purchase a major Russian manufacturing operation—Novosibirsk Optical Company
• Formed the first Russian-American joint venture in Central Siberia, Russia—Sibercor, Ltd
• Formed an early Chinese-American joint venture in the paperboard packaging business—Globalpac, Inc. which was one of the first in China for a small independent American businessman.
• Landed one of the largest collegiate facility naming rights deals—Capital One Field at the University of Maryland

Mr. Hill began his career in the public service sector, where he headed three important business development agencies.

• **Anacostia Economic Development Corporation**—Community-based organization with the mission of generating economic development in the Anacostia section of Washington, DC
• **Washington Business Resource Center**—Citywide organization designed to foster the development and growth of small and minority-owned businesses in the Washington, DC metropolitan region.
• **Greater Washington Business Center**—One of the largest small business development centers in the country that during Darryl’s tenure as Executive Director provided technical and financial assistance to over 2,500 small and minority businesses.
• **MESBIC**—Founded and capitalized the first publicly held Minority Small Business Investment Company.

Mr. Hill was appointed by the President to be the first Chairman of the National Minority Supplier Development Council whose mission is to foster purchasing from minority firms by major U.S. corporations.

Mr. Hill is a frequent speaker before executives of major corporations. He has addressed the subject of diversity to top management at a number of Fortune 500 companies and has helped them design and formulate their diversity programs. **Under Mr. Hill’s leadership, diversity at PennStar will be without peer.**

Now Mr. Hill has entered the new explosive arena of legalized marijuana. Just as he has done many times in the past, Mr. Hill has found a path to make financial gains, while at the same time garnering social benefits from his ventures. Cannabis production and sales is one of the nation’s fastest growing businesses with an unmeasured upside. The legalized cannabis business can have a significant impact on the country’s underserved communities and the minority business economy as well. However, to date, that promise has not been realized. Very
few minorities have profited from legal cannabis. Mr. Hill has built a minority owned and controlled business venture that takes that challenge head on.

**Part II – PennStar will Strive to Remain Diverse**

*Diversity Program Development*

It is important for a company’s vision to have goals in place, but defining clear action steps that can be taken to meet those goals is as—if not more—important. PennStar is a company driven by results, and we know that without a clear action plan, results can be hard to achieve. PennStar believes that its culture of diversity and inclusion is innate, nonetheless, PennStar is committed to demonstrating to the Department its commitment to diversity.

This section will describe clear, concrete actions that PennStar will undertake to work towards the goals outlined. Some goals are implementable pre- and during launch, and others will be realized over time. Still others will be ongoing for the life of the company. PennStar will continue to review and evaluate its performance towards its goals and work with local stakeholders to continually improve its diversity plan.

*Diversity in Ownership*

PennStar is already minority-owned. PennStar believes that there is value in minority-ownership and for this reason, the minority-owned status will tend toward self-maintenance. In other words, selling a majority share to non-ethnic minorities would hurt the value of the company vis-à-vis its host community and employees and is therefore unlikely. However, PennStar intends to maintain its status as a minority-owned company by using a two important structural tools:

1. Right of first refusal will be given to every existing shareholder at 20% or more. If a sale is contemplated, the other owners would have the opportunity to meet the sale terms and take possession of the shares offered. This increases the percent of the pie owned by current members and maintains its minority-owned status.

2. Tag-along rights will be given to every minority shareholder. Majority shareholders must include the minority shareholder in any contemplated transaction, so that the smaller owner does not get bullied out. This is an option for the minority shareholder to participate, not an obligation. This prevents a new non-ethnic-minority owner from buying a majority and then pushing out the minority shareholders.

*Training*

PennStar will offer training programs for its employees so that those within its ranks are equally eligible for these open, higher level positions. Mentorship programs that are discussed in more detail below, and will help train and prepare employees for positions of increased responsibility.

*Community Involvement*

In order for a company to better understand the community in which it is located, to create good will among residents, and better serve its consumers, company leaders should be engaged in the local community. PennStar Board members and executives will engage in local Philadelphia community service organizations, either as a group or individually.
When recruiting for top positions, the company will show preference to candidates who demonstrate a connection to the local community and a habit of this kind of participation. PennStar will partner with local nonprofits to see where assistance is needed, and to foster an ongoing, mutually beneficial relationship between our facility and the community.

**Diversity in Management and Staffing**

PennStar expects to have the following managerial and staff positions:

- Security Director
- General Manager
- Lead Cultivator
- Chief Compliance Officer
- Harvest and Processing Manager
- Extraction Manager
- Data Administration Manager
- Lead Cultivation Associate
- Cultivation Associate
- Harvest and Processing Associate
- Trimming Associate
- Packaging Associate
- Extraction Technician
- Facilities Manager
- Human Resources (HR) staff
- Office Staff
- Inventory Analysts
- Cultivation Associates
- Harvesting and Processing Associates
- Packaging and Labeling Associates
- Trimming Associates
- Security Staff/Personnel
- Transportation Agents
- Quality Control Associates

In order to ensure that women, minorities, veterans, and disabled individuals hold some of these positions, PennStar will take the following actions:

1. **Implement a plan to seek management-level employees from diverse talent pools.**

From the outset, PennStar will seek to recruit individuals for managerial positions from a diverse pool of candidates and give special consideration to qualified candidates who are either female, of a diverse ethnic or racial background, veterans, or disabled. PennStar will work with community-based recruitment offices, local schools, and training centers to promote its open positions and recruit eligible candidates.
As above, PennStar’s Human Resources department will strive to cast a wide net when seeking new talent. This includes recruiting at local schools and vocational training programs, through local Pennsylvania internet databases with a diversity pool of job-seekers and other community-based employment programs. PennStar will work with local nonprofits and job fairs and when appropriate, hold its own open-house events featuring new opportunities at the company. PennStar will also send its employees that are members of minority groups to represent it at recruitment events.

Within one year of operation, PennStar intends to have a workforce that is at least two-thirds women, minorities, veterans, service-disabled veterans, and otherwise disabled individuals.

2. **Promote from within by offering training programs for employees to become eligible for higher-level positions.**

It is often the upper-level management’s responsibility to ensure that employees are taking advantage of and becoming eligible for promotion. This is especially true for members of historically marginalized and disadvantaged groups. However, the best managers are those who rise through the ranks of an organization and can therefore best understand the needs and concerns of its employees.

PennStar is committed to offering training opportunities for its employees, either in-house or externally, by offering partial scholarships for executive-level training programs. All employees will be offered these opportunities equally. Higher-level employees will be recruited to act as mentors for lower-level employees, and the mentorship program will seek especially to empower minorities, women, and members of other historically marginalized groups.

Employees will have access to interview-skills training, performance evaluations, and team-dynamics training.

3. **Ensure that managers are engaged in the local community through volunteering and activism.**

Local involvement by a company’s employees is an important way for the company to solidify its goodwill and commitment to the community in which it is located. Local involvement also grows a company’s network and diversifies its opportunities for recruitment and contracting.

In order to promote volunteerism, PennStar will provide paid time off for employees to volunteer at local-nonprofits and community organizations. Managers who engage in the most volunteerism will be recognized every year through a special recognition program.

4. **Conduct exit interviews.**

Whether or not a company can successfully retain talent is a major marker of its success. It is essential to PennStar that its employees want to grow with the company, learn the company’s
processes from the inside-out, and that they be offered opportunities for professional development and promotion.

PennStar is committed to making sure its employees know they are appreciated through generous benefit packages and regular employee-oriented recreational events. Where appropriate, employees will be offered opportunities to train for different and higher-level positions. Upper-level employees will act as mentors for new and lower-level employees so that potential for promotion can be identified and pursued.

When an employee leaves the company voluntarily, they will be interviewed to discover what, if anything, the company could have done to retain that employee. All such feedback will be analyzed and regular reports provided by Human Resources to managers and the Board. Employee retention efforts will be guided by such exit interviews and also by regular “check-ins” with active employees. Creating a communication channel from employees and former employees to management and executive level staff is a high-priority for the company.

**Diversity in Contracting**

PennStar will regularly need to purchase goods and services, from raw materials to construction work on its facility. The list of needs that will be sourced from ancillary suppliers is extensive, and includes everything from the expected operational goods such as cultivation supplies and packaging to services such as advertising, plumbing, and legal advice, to name but a few. PennStar will hold themselves to the following standards in contracting:

1. **For any contract or project, implement a system to first seek out opportunities with MBEs, WBEs, and DSBEs and certified small businesses.**

   PennStar will actively and regularly use the Commonwealth’s searchable database for Pennsylvania Small and Diverse Businesses when seeking out suitable businesses to contract with for the goods or services listed above. PennStar will regularly reach out to the local chapters of the Women’s Small Business Association, the National Minority Supplier Development Council, the Philadelphia Office of the United States Small Business Administration, Vets First Verification Program, and others to see how it can continue to foster connections with new minority-owned businesses. The internal system to be implemented will be such that when contracting needs are identified, a manager will be responsible for compiling a list of companies qualified for the job from that database. These companies will be contacted and asked for bids or price quotes.

2. **Create a system whereby companies comprised of diverse ownership and employment are preferred for awards of contracts.**

   PennStar’s request for bids will, importantly, include questions about diversity. Those bidders who are listed in the database or otherwise show a commitment to diversity will be scored higher than those who do not. Price will be a factor in choosing where to award contracts, but it will not be the sole measure. A company’s qualification as an MBE, WBE, DSBE, small
business, or otherwise showing a commitment to diversity will be given priority when assessing bids.

3. Regularly audit the company’s book of contracts to ensure that a substantial amount of contracts are diverse.

The most important factor is the fact that PennStar is a minority owned and operated company that has a working familiarity with the minority business community. Contracting with minority companies will be substantially easier as knowledge, understanding and relationships are inherent.

**Conclusion**

PennStar Medical, LLC is a 100% minority owned and operated company of the objectives that other company’s must seek to achieve through diversity plans are built into PennStar such as diversity of corporate leadership, diversity of management, diversity awareness and sensitivity, community understanding and awareness and methods of outreach. The highlights of PennStar’s are:

- 100% minority owned;
- The Board of Directors is 100% comprised of minorities;
- Top management is 80% comprised of minorities;
- Lead by acclaimed diversity pioneer, icon, and expert, Darryl Hill;
- Will hire from a community that its intimately familiar with;
- Is sensitive and aware of the community where it will be located;
- Has a plan for employees and members of the community to gain equity interest in the company; and
- Has a working familiarity with minority subcontractors.

*The heart of the PennStar diversity plan is the fact that it is diverse.* PennStar will go a long way toward helping to correct the inequities that currently exist in the cannabis industry as far as ownership by African Americans and other ethnic minorities is concerned. PennStar will make the Commonwealth of Pennsylvania proud.

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**Part C – Applicant Background Information**

*(Scoring Method: Pass/Fail)*

For this part the applicant is required to provide background and contact information for the principals, financial backers, operators and employees.

**Section 4 – Principals, Financial Backers, Operators and Employees**

A. Please list all Principals, Financial Backers and Operators

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Medical Marijuana Dispensary Permit Application

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Middle Name:  [Name]
Last Name:  [Name]
Suffix:  [Suffix]

Occupation:  [Occupation]
Title in the applicant’s business:  [Title]

Also known as:  [Name]
Date of birth:  MM/DD/YYYY

Address Line 1:  [Address]
Address Line 2:  [Address]
Address Line 3:  [Address]
City:  [City]
State:  [State]
Zip Code:  [Zip]

Phone:  [Phone]
Fax:  [Fax]
Email:  [Email]

IF MORE SPACE IS REQUIRED, PLEASE SUBMIT ADDITIONAL INFORMATION ON OTHER INDIVIDUALS IN A SEPARATE DOCUMENT TITLED “PRINCIPALS, FINANCIAL BACKERS AND OPERATORS (CONTD.)” IN ACCORDANCE WITH THE ATTACHMENT FILE NAME FORMAT REQUIREMENTS AND INCLUDE IT WITH THE ATTACHMENTS.

B. Please list Employees

PLEASE PROVIDE THE FOLLOWING INFORMATION FOR ANY EMPLOYEES THAT HAVE BEEN HIRED TO DATE TO WORK FOR THE APPLICANT LISTED IN THIS APPLICATION. IF NO EMPLOYEES ARE CURRENTLY EMPLOYED, PLEASE LEAVE THIS SECTION BLANK.

Name and Residential Address

Name and Residential Address

Name and Residential Address

Name and Residential Address

Name and Residential Address
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

Name and Residential Address

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<tr>
<th>First Name:</th>
<th>Middle Name:</th>
<th>Last Name:</th>
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IF MORE SPACE IS REQUIRED, PLEASE SUBMIT ADDITIONAL INFORMATION ON OTHER INDIVIDUALS IN A SEPARATE DOCUMENT TITLED “EMPLOYEES (CONT.)” IN ACCORDANCE WITH THE ATTACHMENT FILE NAME FORMAT REQUIREMENTS AND INCLUDE IT WITH THE ATTACHMENTS.

Section 5 – Moral Affirmation

By checking “Yes,” you affirm that each principal, financial backer, operator and employee listed in this permit application is of good moral character.

☐ Yes  ☐ No

Section 6 – Compliance with Applicable Laws and Regulations

By checking “Yes,” you affirm that you, as well as the principals, financial backers, operators and employees listed in this permit application are able to continuously comply with all applicable Commonwealth laws and regulations relating to the operation of a medical marijuana dispensary.

☐ Yes  ☐ No

Section 7 – Civil and Administrative Action

For the statements below:
- By checking “Yes,” you affirm the statement
- If you check “No,” you must state your reasoning in “Schedule A” below

<table>
<thead>
<tr>
<th>Civil and Administrative Action</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>The applicant has never responded to an action resulting in sanctions, disciplinary actions or civil monetary penalties being imposed relating to a registration, license, permit or any other authorization to grow, process or dispense medical marijuana in any state.</td>
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<tr>
<td>The applicant has never responded to a civil or administrative action relating to a registration, license, permit or authorization to grow, process or dispense medical marijuana in any state.</td>
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</table>
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

The applicant has never been accused of obtaining a registration, license, permit or other authorization to operate as a grower, processor or dispensary of medical marijuana in any jurisdiction by fraud, misrepresentation, or the submission of false information.

No civil or administrative action has been taken against the applicant under the laws of the Commonwealth or any other state, the United States or a military, territorial or tribal authority relating to a principal, operator, financial backer or employee of the applicant’s profession, or occupation or fraudulent practices, including fraudulent billing practices.

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<thead>
<tr>
<th>Defendant</th>
<th>Name of Case &amp; Docket #</th>
<th>Nature of Charge or Complaint</th>
<th>Date of Charge or Complaint</th>
<th>Disposition</th>
<th>Name and Address of the Administrative Agency Involved, and the Tribunal or Court</th>
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Part D – Plan of Operation
(Scoring Method: 550 Points)

A PLAN OF OPERATION IS REQUIRED FOR ALL DISPENSARY PERMIT APPLICATIONS. THE PLAN OF OPERATION MUST INCLUDE A TIMETABLE OUTLINING THE STEPS THE APPLICANT WILL TAKE TO BECOME OPERATIONAL WITHIN SIX MONTHS FROM THE DATE OF ISSUANCE OF A PERMIT. THE PLAN OF OPERATION MUST ALSO DESCRIBE HOW THE APPLICANT’S PROPOSED BUSINESS OPERATIONS WILL COMPLY WITH STATUTORY AND REGULATORY REQUIREMENTS NECESSARY FOR THE CONTINUED OPERATION OF THE FACILITY.

Plan of Operation

What must be covered in a Plan of Operation?

Applicants must identify how they will comply with relevant laws and regulations regarding:

- Security and Surveillance
- Employee qualifications and training
- Transportation of medical marijuana and medical marijuana products
- Storage of medical marijuana products
- Inventory management
- Recordkeeping
- Prevention of unlawful diversion of medical marijuana and medical marijuana products
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

- A timetable outlining the steps required for the applicant to become operational within six months from the date of issuance of a dispensary permit

By checking “Yes,” you affirm that you are able to continuously maintain effective security, surveillance and accounting control measures to prevent diversion, abuse and other illegal conduct regarding medical marijuana and medical marijuana products.

Section 8 – Operational Timetable

IF ISSUED A PERMIT, PLEASE DESCRIBE THE STEPS AND TIMEFRAMES FOR BECOMING FULLY OPERATIONAL AS A DISPENSARY WITHIN SIX MONTHS FROM THE DATE OF ISSUANCE OF A DISPENSARY PERMIT. SPECIFICALLY, PLEASE PROVIDE THE STEPS YOU WILL TAKE TO BEGIN THE PROCESS FOR THE HANDLING, STORING, AND TRANSPORTING OF MEDICAL MARIJUANA AND MEDICAL MARIJUANA PRODUCTS.

<table>
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<tr>
<th>Activity</th>
<th>Estimated Date</th>
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<tr>
<td>Please see attached for complete timetable.</td>
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IF MORE SPACE IS REQUIRED FOR THE OPERATIONAL TIMETABLE, PLEASE SUBMIT ADDITIONAL INFORMATION IN A SEPARATE DOCUMENT TITLED “OPERATIONAL TIMETABLE (CONTD.)” IN ACCORDANCE WITH THE ATTACHMENT FILE NAME FORMAT REQUIREMENTS AND INCLUDE IT WITH THE ATTACHMENTS.

Section 9 – Employee Qualifications, Description of Duties and Training

A. PLEASE PROVIDE A DESCRIPTION OF THE DUTIES, RESPONSIBILITIES, AND ROLES OF EACH PRINCIPAL, FINANCIAL BACKER, OPERATOR AND EMPLOYEE.

1. Title: Senior Advisor

Purpose and Scope: Analyze the business plan, risk factors, and financial data to generate optimal advisement on investments, marketing, and potential funding opportunities with the goal of assuring financial sustainability. In addition, stay abreast of new developments.
Organizational Relationship: Advises the executive team and managerial staff on research findings, market trends, and best business practices.

Responsibilities: Maintain a deep understanding of the business, market, and industry. Provide “wise counsel” on issues raised by principals, executive team, management, and employees. Encourage and support the exploration of new business ideas. Embrace and stimulate the development of a governance framework for sustainable growth.

Role Requirements: Capacity to provide strong leadership, sound advice, and support for industry best practices. Attend and participate in community outreach programs. Foster—and assist associates and colleagues in the transition to—the cultural and business norms of medical cannabis.

Industry Prerequisites: Shares a common goal and interest in the medical cannabis field and can facilitate the necessary steps to ensure a high-quality and safe product. Possesses experience, education, or knowledge in the cannabis industry or related fields. Aptitude and ability to comply with all Pennsylvania medical cannabis industry laws and regulations.

Training Requirements: Participates in and provides attendance certification for the mandatory two-hour Department of Health training, as required by Pennsylvania Rules and Regulations §1141.48. Engages in and recommends external staff training related to medical cannabis and participate in recommended internal training on relevant topics including, but not limited to, proper record keeping, diversion of medical marijuana, emergency operating procedures, and industry best practices.

Technology Requirements: Thorough familiarity with the electronic tools, applications, and delivery systems standard to the industry. Ability to utilize relevant computer technology and willingness to continue adapting to the evolving technological requirements of modern medical health centers. Maintains familiarity with techniques, methods, and compliance standards for tracking medical cannabis product from seed to sale, as well as with industry terminology and scientific techniques relevant to commercial medicinal cannabis.

2.

Title: Medical Director

Purpose and Scope: Serve and counsel on matters related to the medical cannabis patient as well as product delivery and efficacy. Ensure medical services and operations are in compliance with Pennsylvania regulatory and licensing agencies.

Organizational Relationship: The Medical Director reports directly to the executive team.

Responsibilities: On behalf of PennStar, develops and maintains working relationships in the health provider community. Develops relationships with hospitals and specialty providers to educate and advocate the use of medical cannabis. Recommends hands-on staff training to communicate changes in regulations and best practices.
Role Requirements: Expertise to field questions and concerns from patients, staff, and executive team. Collaborate with local healthcare professionals to establish a resource network within the community. Foster open communication with patients, principals, and employees. Attend and participate in community outreach programs.

Industry Prerequisites: Track record as board-certified clinical director or other clinical managerial position. Experience in clinical supervision and program management with medical cannabis patients. Must have experience in the cannabis industry or a related field and must be intimately familiar with Pennsylvania cannabis industry laws and regulations.

Training Requirements: Participates in and provides attendance certification for the mandatory two-hour Department of Health training, as required by Pennsylvania Rules and Regulations §1141.48. Engages in and recommends external staff training related to medical cannabis and participate in recommended internal training on relevant topics including, but not limited to, proper record keeping, diversion of medical marijuana, emergency operating procedures, and industry best practices.

Technology Requirements: Demonstrates the ability to utilize computer technology and the willingness to continue adapting to the evolving technological requirements of modern medical cannabis. Maintains familiarity with the techniques, methods, and compliance standards for tracking medical cannabis product from seed to sale. Shows command of industry terminology and scientific techniques relevant to medicinal cannabis.

3.

Title: Patient, Community, and Government Outreach Director

Purpose and Scope: Represents and advocates for medical cannabis patients and establishes community goals for education, support, and events. Encourages agency liaisons, community groups, and patients to structure relationships based on understanding and compassion. Executes plans for community events and outreach to strengthen PennStar’s relationship with local population.

Organizational Relationship: The Patient, Community, and Government Outreach Director is part of the executive team and reports directly to the CEO.

Responsibilities: Builds a strong rapport with the community through increased community awareness, promotions, fundraising, partnerships, and general marketing. Provides marketing collateral materials for review by the executive team for approval, prior to release as stated in §1141.50. Recruit and mentor staff to volunteer to promote inclusion, education, and community.

Role Requirements: Expertise to assist medical cannabis patients in determining which programs and services will best serve them. Ability to maintain respectful relationships with medical patients, administrative personnel, and external professional groups and agencies. Assemble and strengthen relationships with media, government, community, and related
organizations. Advocate and promote the safe access to medical cannabis. Attend and participate in community outreach programs. Foster—and assist associates and colleagues in the transition to—the cultural and business norms of medical cannabis.

**Industry Prerequisites:** Experience in program management with medical cannabis patients is preferred. Must possess experience, education, or knowledge in the cannabis industry or a related field. Aptitude and ability to comply with all Pennsylvania medical cannabis industry laws and regulations.

**Training Requirements:** Participates in and provides attendance certification for the mandatory two-hour Department of Health training, as required by Pennsylvania Rules and Regulations §1141.48. Engages in and recommends external staff training related to medical cannabis and participate in recommended internal training on relevant topics including, but not limited to, proper record keeping, diversion of medical marijuana, emergency operating procedures, and industry best practices.

**Technology Requirements:** Demonstrates the ability to utilize relevant computer technology and the willingness to continue adapting to the evolving technological requirements of modern medical cannabis. Maintains familiarity with the techniques, methods, and compliance standards for tracking medical cannabis product from seed to sale. Shows command of industry terminology and scientific techniques relevant to medicinal cannabis.

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4.

**Title:** Research and Development Specialist  
**Purpose and Scope:** The position merges innovation management and technology management to provide fundamental research, conceptual development, and process development.

**Organizational Relationship:** Reports directly to Chief Technology Officer to assess, relate, and analyze research issues, concerns, and incidents.

**Responsibilities:** Contributes to the management of internal research and development to ensure alignment with PennStar goals. Conducts studies with clinical professionals to ensure standards are met in safety, quality, and environmental compliance audits. Performs surveys to gauge product satisfaction and interest in new innovations.

**Role Requirements:** Research, develop, and implement formulations that provide safe and effective products. Ensure related personnel receive appropriate training and are assessed as competent to perform tasks in laboratory areas. Attend and participate in community outreach programs. Foster—and assist associates and colleagues in the transition to—the cultural and business norms of medical cannabis.

**Industry Prerequisites:** Practical experience in research and development projects. Experience, education, or knowledge in the cannabis industry or related field. Aptitude and ability to comply to all Pennsylvania medical cannabis industry laws and regulations.
Training Requirements: Participates in and provides attendance certification for the mandatory two-hour Department of Health training, as required by Pennsylvania Rules and Regulations §1141.48. Engages in and recommends external staff training related to medical cannabis and participate in recommended internal training on relevant topics including, but not limited to, proper record keeping, diversion of medical marijuana, emergency operating procedures, and industry best practices.

Technology Requirements: Possesses laboratory experience and demonstrates scientific ability directly related to research and development. Shows ability to utilize relevant computer technology and the willingness to develop and evolve technologies relevant to modern medical cannabis. Maintains familiarity with techniques, methods, and compliance standards for tracking medical cannabis product from seed to sale. Shows command of industry terminology and scientific techniques relevant to medicinal cannabis.

5.

Title: Information and Technology Specialist

Purpose and Scope: Coordinates between PennStar, external vendors, and contractors about IT-related infrastructure and development. Consults with Chief Technology Officer on any issues that might arise and advises on potential fixes and efficiency controls.

Organizational Relationship: Reports directly to Chief Technology Officer to assess and analyze information and technology issues, concerns, and incidents.

Responsibilities: Assess infrastructure on a regular basis to ensure it continues to meet necessary demands. Develop new strategies and IT procedures to increase efficiency, enhance workflow, and improve customer satisfaction. Protect PennStar’s data from outside infiltration through encryption, secure data storage, and other means. Assist with installation and maintenance of software, hardware, and applications and provide training on their use.

Role Requirements: Provides technical support and expertise to all employees. Ability to handle multiple requests and provide working solutions in a timely fashion. Attend and participate in community outreach programs. Foster—and assist associates and colleagues in the transition to—the cultural and business norms of medical cannabis.

Industry Prerequisites: Practical experience in information technology and development projects. Possess experience, education, or knowledge in the cannabis industry or related field. Aptitude and ability to comply with all Pennsylvania medical cannabis industry laws and regulations.

Training Requirements: Participates in and provides attendance certification for the mandatory two-hour Department of Health training, as required by Pennsylvania Rules and Regulations §1141.48. Engages in and recommends external staff training related to medical cannabis and participate in recommended internal training on relevant topics including, but not limited to,
proper record keeping, diversion of medical marijuana, emergency operating procedures, and industry best practices.

*Technology Requirements:* Demonstrates expertise necessary to utilize computer technology and the willingness to meet the evolving technological requirements of modern medical cannabis. Maintains familiarity with the techniques, methods, and compliance standards for tracking medical cannabis product from seed to sale. Shows command of industry terminology and scientific techniques relevant to medicinal cannabis.

6.

**Title: Security Director**

*Purpose and Scope:* Directs the development, implementation, and evaluation of PennStar’s security and risk minimization programs to ensure a secure facility and environment for the employees and patients as well as the security of physical assets, intellectual assets, and information technology/computer systems.

*Organizational Relationship:* Reports directly to CEO and CTO to assess, relate, and analyze security issues, concerns, and incidents.

*Responsibilities:* Plans, examines, analyzes, evaluates, and supervises PennStar’s security procedures, practices, and precedents, inclusive of physical security assets and security personnel. Serves as PennStar’s liaison with public law enforcement, fire, and other agencies in regard to security and personnel.

*Role Requirements:* Develops preventative security programs and proposes changes and updates to ensure operational security at all times. Provides security training to all employees. Foster—and assist associates and colleagues in—the transition to the cultural and business norms of medical cannabis.

*Industry Prerequisites:* Shows strong leadership and applied knowledge in crisis management, strategic planning, and risk analysis. Provides proof of law enforcement experience or a position associated with local law officials. Practical experience in security systems and procedures. Possessed experience, education, or knowledge in the cannabis industry or a related field. Aptitude and ability to comply with all Pennsylvania medical cannabis industry laws and regulations.

*Training Requirements:* Participates in and provide attendance certification for the mandatory two-hour Department of Health training, as required by Pennsylvania Rules and Regulations §1141.48. Engages in and recommends external staff training related to medical cannabis and participate in recommended internal training on relevant topics including, but not limited to, proper record keeping, diversion of medical marijuana, emergency operating procedures, and industry best practices.

*Technology Requirements:* Demonstrates skills necessary to utilize computer technology and the willingness to meet the evolving technological requirements of modern medical cannabis.
Maintains familiarity with the techniques, methods, and compliance standards for tracking medical cannabis product from seed to sale. Shows command of industry terminology and scientific techniques relevant to medicinal cannabis.

7.

**Title: Cannabis Industry Expert**

**Purpose and Scope:** Defines the business process, policies, and application requirements for medical cannabis. Provides authority and knowledge on the subject of cannabis with a focus on compliance.

**Organizational Relationship:** Reports directly to executive team to assess, relate, and analyze cannabis concerns, issues, and successes.

**Responsibilities:** Confirms policies, procedures, work instructions, and standard operation procedures (SOP) are documented in a clear and concise manner. Conduct in-house training on documented policies to identify relevant legislative requirements. Contribute management reports relating to operations systems, compliance, and conditions. Collaborate with industry entities to establish a library of compliance resources, including industry standards. Conduct and coordinate training for new hires, principals, executive staff, and advisory board.

**Role Requirements:** Provide expertise on the topic of medical cannabis and innovation to ensure compliance with industry best practices. Attend and participate in community outreach programs. Foster—and assist associates and colleagues in the transition to—the cultural and business norms of medical cannabis.

**Industry Prerequisites:** Fluent in strain identification, best business practices for the cannabis industry, and current legislative measures. Practical experience in the cannabis industry or advocacy group. Aptitude and ability to comply with all Pennsylvania medical cannabis industry laws and regulations.

**Training Requirements:** Participates in and provides attendance certification for the mandatory two-hour Department of Health training as required by Pennsylvania Rules and Regulations §1141.48. Engage in and recommend external training to other staff members related to medical cannabis and participate in recommended internal training on relevant topics including, but not limited to, proper record keeping, diversion of medical marijuana, emergency operating procedures, and industry best practices.

**Technology Requirements:** Presents extensive knowledge in field of medical cannabis. Demonstrates skills necessary to utilize computer technology and the willingness to meet evolving technological requirements of modern medical cannabis. Maintains familiarity with the techniques, methods, and compliance for tracking medical cannabis product from seed to sale. Shows command of industry terminology and scientific techniques relevant to medicinal cannabis.
Title: Chief Executive Officer

Purpose and Scope: Sets strategy and direction for the entire organization. Models and embraces PennStar’s culture and values.

Organizational Relationship: Leads the executive team consisting of the Chief Financial Officer, Chief Operations Officer, Chief Extractions and Formulations, Chief Technology Officer, Marketing and Public Relations Officer, and Community Outreach Coordinator. Provides support to Advisory Board.

Responsibilities: Builds and leads the executive team. Develops and executes long term strategy in conjunction with Advisory Board recommendations. Abides by specific internally established control systems and authorities. Leads by personal example and encourages all employees to conduct their activities in accordance with all applicable laws, standard operating procedures, and policies, including environmental, safety, and health policies. Oversees nonprofit fundraising planning and implementation.

Role Requirements: Attend and participate in community outreach programs. Develop synergistic relationship with industry experts. Provide an innovative approach to address the complexities of various financial structures, outsourcing opportunities, public communications, and competitive intelligence. Foster—and assist associates and colleagues in the transition to—the cultural and business norms of medical cannabis.

Industry Prerequisites: Previous career path in related field or position as CEO or key executive position in large corporation. Practical and demonstrated experience in the cannabis industry or advocacy group. Aptitude and ability to comply with all Pennsylvania medical cannabis industry laws and regulations.

Training Requirements: Participates in and provides attendance certification for the mandatory two-hour Department of Health training, as required by Pennsylvania Rules and Regulations §1141.48. Engage in recommended external industry training related to medical cannabis and participate in recommended internal training on relevant topics including, but not limited to, proper record keeping, diversion of medical marijuana, emergency operating procedures, and industry best practices.

Technology Requirements: Presents extensive knowledge in field of medical cannabis. Demonstrates skills necessary to utilize computer technology and the willingness to meet evolving technological requirements of modern medical cannabis. Maintains familiarity with the techniques, methods, and compliance for tracking medical cannabis product from seed to sale. Shows command of industry terminology and scientific techniques relevant to medicinal cannabis.
Title: Senior Advisor
Qualifications: Decisive leadership and applied knowledge in strategic planning, risk analysis, and production management. Influential in the business community; able to create synergistic relationships with industry experts and other related professionals. Provides innovative input for financial sustainability, positive public relations, and competitive intelligence. Assists in standardizing training and seminars to educate public on medical cannabis. Advanced understanding of the complexities, compliance, and best business practices for the medical cannabis industry. Clear understanding of industry terminology and scientific methods used to create medical cannabis products. Committed to enforcing compliance with industry laws and regulations. Certified participation in the mandatory two-hour Department of Health training, as required by Pennsylvania Rules and Regulations §1141.48.

2.

Title: Medical Director
Qualifications: Expertise to provide sound advice regarding the products and services of the medical cannabis industry. Extensive research and clinical experience. Structured knowledge of clinical facility operations; able to provide valuable input on setup, execution, and success using proven best practices. Represents a mature and scientific attitude toward cannabis and the healing benefits. Advanced knowledge of the complexities, compliance, and best business practices for the medical cannabis industry. Clear understanding of industry terminology and scientific methods used to create and produce medical cannabis products. Committed to enforcing compliance with industry laws and regulations. Certified participation in the mandatory two-hour Department of Health training, as required by Pennsylvania Rules and Regulations §1141.48.
**Title:** Research and Development Specialist

**Qualifications:** Disciplined experience in research and development uncovering new products, efficient methodologies, and product formulations. Capable of following and adhering to compliance standards when considering advancements or new patents. Engaged with third-party companies to collaborate and exchange ideas in the scientific community. Proven competency in laboratory and clinical environments. Advanced understanding of the complexities, compliance, and best business practices for the medical cannabis industry. Clear command of industry terminology and scientific methods used to create medical cannabis products. Committed to enforcing compliance with industry laws and regulations. Certified participation in the mandatory two-hour Department of Health training, as required by Pennsylvania Rules and Regulations §1141.48.
7. **Title: Cannabis Industry Expert**

*Qualifications:* Ambitious and amicable expert in all things related to cannabis. Constantly conversant with government officials, medical experts, and patients on the impact of medical cannabis in their daily lives. Comfortable presenting information to community outreach groups and supporting advocates by answering detailed compliance questions. Committed to cannabis advancements and continued research. Distinguished understanding of the complexities, compliance, and best business practices for the medical cannabis industry. Clear comprehension of industry terminology and scientific methods used to create medical cannabis products. Committed to enforcing compliance with industry laws and regulations. Certified participation in the mandatory two-hour Department of Health training, as required by Pennsylvania Rules and Regulations §1141.48. Enhances relationships with community leaders, media outlets, and industry-related ancillary businesses while abiding by the Pennsylvania Advertising Rules and Regulations §1141.50.

8. **Title: Chief Executive Officer**

*Qualifications:* Proficiently disciplined in strategic planning and directional implementation of set policy and procedures. Honorable approach to obtain resources, set budget, and record expense spending. Operates on instinct, factual data, and modern experience. Capable of performing management duties and rolling up the sleeves to pitch in. Exercises best practice policies in all aspects of the business. Distinguished understanding of the complexities, compliance, and best business practices for the medical cannabis industry. Clear command of industry terminology and scientific methods used to create medical cannabis products. Committed to enforcing compliance with industry laws and regulations. Certified participation in the mandatory two-hour Department of Health training, as required by Pennsylvania Rules and Regulations §1141.48. Enhances relationships with community leaders, media outlets, and industry-related ancillary businesses while abiding by the Pennsylvania Advertising Rules and Regulations §1141.50.

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C. **PLEASE DESCRIBE THE STEPS THE APPLICANT WILL TAKE TO ASSURE THAT EACH PRINCIPAL AND EMPLOYEE WILL MEET THE TWO-HOUR TRAINING REQUIREMENT UNDER THE ACT AND REGULATIONS.**

1. **Staff Training Requirements:** Validate and confirm employment with the two-hour training requirement required by Pennsylvania Rules and Regulations §1141.48. Without exception, no candidate for hire will begin operational duties before successfully completing and providing evidence certifying the two-hour training requirement. In addition to the state training requirement, candidates will be subjected to competency-based assessment for evaluating knowledge and skills as well as a demonstration of their knowledge and skills in application. If a new hire already knows the compliance regulations, allow an opportunity to test out and
continue to areas that need improvement. Applicant will align company-wide standard operating procedures and training curriculum to cover specific provisions and responsibilities covered in the Pennsylvania Rules and Regulations §1141.48 for principals and employees of cannabis operations. Topics will include proper handling of medical marijuana, accurate record keeping, and how to prevent and detect the diversion of medical marijuana. Also included in the training will be best practices for security procedures, addressing employee access points and vendor and visitor access points as well as safety procedures including responding to a medical emergency, fire, or a chemical spill or threatening events including an armed robbery, burglary, or criminal incident. Retrain employees when changes in policy occur. All positions including principals, managers, and support staff are required to schedule and successfully complete the training as soon as it becomes available at the Department of Health, located specifically in PennStar Medical’s Pennsylvania region. The required training is available at no cost to all medical marijuana organization’s principals and employees. Initial contact will be made on PennStar’s behalf to confirm and arrange the two-hour training course. Provide staff with Department of Health links for FAQ’s, training schedule, and updates to State training requirements via company intranet. The Human Resource Manager communicates information to principals, managers, and employees on a continual basis. As part of standard operating procedures and document retention, training attendance records pertaining to internal and external training, including a copy of the Pennsylvania certification for completing the two-hour required course, as required by Pennsylvania Rules and Regulations §1141.48, will be retained and stored for future compliance audits.

2. **Implement Compliance and Ethics Program:** By establishing a company-wide culture of compliance, PennStar will create environment for new hires that speeds up the process of learning compliance requirements. By setting positive employee behavior and attitude toward compliance from the start, employees will understand the company’s strict stance on compliance. Initiate customized training to each new hire as their needs require. Combine the importance of compliance with corporate ethics and establish a climate of ethical conduct. Complaint focus will be on both concepts to establish a compliance and ethics program as part of the daily business culture. Create training guidelines to incite the importance of a code of conduct alongside the strict rules of compliance. Provide systems for confidential reports and internal investigations. Provide a hotline or anonymous reporting system for others to report suspected or actual misconduct.

3. **Nurture Best Business Practice:** To ensure consistent quality, the use of standard operating procedures will support training and reduce risk. PennStar has adopted clear processes that every member of the team will understand their importance. Engage employees and recognize effort and achievement to help build company loyalty. Create a culture of cohesiveness to the company’s core value and vision. Focus on ongoing team dynamics, to make sure that members don't get distracted by individual activities that lead them off track. Consistent reassessment and realignment of team goals and objectives is the way to achieve the best results. Solicit feedback from processes and areas of the business to gauge customer...
4. **Continual Training Support:** After the initial education, reiterate policies to employees to ensure they stay mindful of compliance. PennStar believes training employees shows them you’re genuinely interested in their personal development. In return they will give their best to the organization, which can eventually lead to better productivity, happier customers, and higher revenue. PennStar will promote continuous learning by introducing new skills required to make jobs more efficient. Trained employees will make fewer mistakes because of increased proficiency. Standard operating procedures with particularly complicated or critical information will require the employee to demonstrate proficiency to a supervisor or manager.

5. **Assertive Compliance Accountability:** Compliance training is not a one-time deal, rather it needs to keep pace with the changing regulatory norms of the industry. By conducting audits and monitoring performance, PennStar can identify areas of improvement. Plan modification efforts will take place through proactive evaluations which reflect commitment to continuous improvement and sustainability. Employee and patient surveys, including transaction and point-of-sale testing, will be used for periodic testing to gauge training needs and customer satisfaction. PennStar is prepared to enforce policies or retrain employees to ensure a stable organizational reputation. It also encourages employees throughout the organization to remain compliant if they can see there are consequences to rule-breaking. Initiate a plan of action when policies are misused and provide transparency about the reason for policy training to foster good faith among staff.

6. **Comprehensive Training and Resource Library:** Training is important but knowledge may fade quickly if training is infrequent or if the employee cannot reference the original policy or procedure. PennStar will establish a resource library with copies of all training materials, standard operating procedures, company policies, employee handbooks, marketing collateral materials, medical cannabis strains and profiles, and other industry-relevant information. Delivery method of material will include the company intranet, onsite company library, and digital downloads.

7. **Train-the-Trainer:** Devise a “train-the-trainer” program to prepare instructors to present information effectively, respond to participant questions, and lead activities that reinforce learning. Direct participants to supplementary resources and reference materials. Instructors will learn to lead discussions, listen effectively, make accurate observations, and help participants to link training to their jobs. Participants learn skills including how to maintain eye contact, maintain a positive attitude, speak in a clear voice, gesture appropriately, and maintain interest and dispel confusion.
8.

Coaching and Mentoring Programs: Encourage employees to continually improve competencies and to develop new in-house alliances where necessary to achieve their goals. Work within their area of personal competence and qualify their experience in relationship to their current role. Creatively apply tools and techniques, which may include one-to-one training, facilitating, counseling, and networking. Facilitate the exploration of needs, motivations, desires, skills, and thought processes to assist the employee in making real, lasting change.

IF MORE SPACE IS REQUIRED FOR ANY OF THE ABOVE THREE COMPONENTS OF SECTION 9 (A, B AND C), PLEASE SUBMIT ADDITIONAL INFORMATION IN A SEPARATE DOCUMENT TITLED “EMPLOYEE QUALIFICATIONS, DESCRIPTION OF DUTIES AND TRAINING (CONTD.)” IN ACCORDANCE WITH THE ATTACHMENT FILE NAME FORMAT REQUIREMENTS AND INCLUDE IT WITH THE ATTACHMENTS.

<table>
<thead>
<tr>
<th>D. Licensed Medical Professionals at Facility</th>
<th>Yes</th>
<th>No</th>
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</thead>
<tbody>
<tr>
<td>A physician or a pharmacist will be present at the primary dispensary location listed in this permit application at all times during the hours the primary dispensary facility is open to dispense or to offer to dispense medical marijuana to patients and caregivers.</td>
<td>✖</td>
<td>□</td>
</tr>
<tr>
<td>If the applicant is operating any dispensaries in addition to the primary dispensary location listed under the permit, and a physician or pharmacist is not present onsite at the additional dispensary or dispensaries, a physician assistant or a certified registered nurse practitioner will be present onsite at each of the other dispensaries instead of a physician or pharmacist.</td>
<td>✖</td>
<td>□</td>
</tr>
<tr>
<td>Any physician, pharmacist, physician assistant or certified registered nurse practitioner employed by a dispensary will, prior to assuming any duties at the dispensary facility, successfully complete a four-hour training course developed by the Department.</td>
<td>✖</td>
<td>□</td>
</tr>
</tbody>
</table>

PLEASE PROVIDE AN EXPLANATION OF ANY RESPONSES ABOVE THAT WERE ANSWERED AS A “NO” AND HOW YOU WILL MEET THESE REQUIREMENTS BY THE TIME THE DEPARTMENT DETERMINES YOU TO BE OPERATIONAL UNDER THE ACT AND REGULATIONS:

Please limit your response to no more than 5,000 words.

Section 10 – Security and Surveillance

A dispensary must have security and surveillance systems, utilizing commercial-grade equipment, to prevent unauthorized entry and to prevent and detect diversion, theft, or loss of any medical marijuana or medical marijuana products.
PLEASE PROVIDE A SUMMARY OF YOUR PROPOSED SECURITY AND SURVEILLANCE EQUIPMENT AND MEASURES THAT WILL BE IN PLACE AT YOUR PROPOSED FACILITY AND SITE. THESE MEASURES SHOULD COVER, BUT ARE NOT LIMITED TO, THE FOLLOWING: GENERAL OVERVIEW OF THE EQUIPMENT, MEASURES AND PROCEDURES TO BE USED, ALARM SYSTEMS, SURVEILLANCE SYSTEM, STORAGE, RECORDING CAPABILITY, RECORDS RETENTION, PREMISES ACCESSIBILITY, AND INSPECTION/SERVICING/ALTERATION PROTOCOLS.
DOH REDACTED
Section 11 – Transportation of Medical Marijuana

<table>
<thead>
<tr>
<th>A. Transportation</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>By checking “Yes,” you affirm that any delivery of medical marijuana to any other medical marijuana organization or approved laboratory within the Commonwealth will adhere to the following:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If you check “No” to any statement, you must state the reasoning for doing so at the end of this section. If issued a permit, you must be able to affirm each statement by the time the Department determines you to be operational under the Act and regulations.</td>
<td></td>
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</tr>
<tr>
<td>• Medical marijuana will only be delivered between 7 a.m. and 9 p.m.</td>
<td>✗</td>
<td></td>
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<tr>
<td>• Medical marijuana will not be transported to any location outside of this Commonwealth.</td>
<td></td>
<td>✗</td>
</tr>
<tr>
<td>• A global positioning system will be used to ensure safe, efficient delivery of the medical marijuana to a medical marijuana organization.</td>
<td>✗</td>
<td></td>
</tr>
<tr>
<td>In addition to having a transport vehicle staffed with a delivery team consisting of at least two individuals, the applicant affirms the following:</td>
<td></td>
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<tr>
<td>• At least one delivery team member will remain with the vehicle at all times that the vehicle contains medical marijuana.</td>
<td>✗</td>
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<tr>
<td>• Each delivery team member shall have access to a secure form of communication with the dispensary, such as a cellular telephone, at all times that the vehicle contains medical marijuana.</td>
<td>✗</td>
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<tr>
<td>• Upon demand, each delivery team member shall produce an identification badge or card to the Department or its authorized agents, law enforcement or other Federal, State, or local government officials if necessary to perform the government officials’ functions and duties.</td>
<td>✗</td>
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<tr>
<td>• Each delivery team member will have a valid driver’s license.</td>
<td>✗</td>
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</tr>
<tr>
<td>• While on duty, a delivery team member will not wear any clothing or symbols that may indicate ownership or possession of medical marijuana.</td>
<td>✗</td>
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</table>
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

- Medical marijuana stored inside the transport vehicle may not be visible from the outside of the transport vehicle.

- A delivery team shall proceed in a transport vehicle from the dispensary, where the medical marijuana is loaded, directly to the medical marijuana organization, where the medical marijuana is unloaded, without unnecessary delays. Notwithstanding the foregoing, a transport vehicle may make stops at multiple facilities, as appropriate, to deliver medical marijuana.

- Any vehicle accidents, diversions, losses, or other reportable events that occur during transport of medical marijuana must be immediately reported to the Department either through a designated phone line established by the Department or by electronic communication with the Department in a manner prescribed by the Department.

- The Department shall be notified daily of the dispensary's delivery schedule, including routes and delivery times, either through a designated phone line established by the Department or by electronic communication with the Department in a manner prescribed by the Department.

- A transport vehicle is subject to inspection by the Department or its authorized agents, law enforcement or other Federal, State or local government officials if necessary to perform the government officials’ functions and duties.

- A transport vehicle may be stopped and inspected along its delivery route or at any medical marijuana organization.

- If a third-party contractor is used, the contractor must comply with all the transportation requirements listed in the Act and regulations.

B. Transport Manifest

By checking “Yes” to any statement, you affirm that the transport manifest (printed or electronic) that accompanies every transport vehicle will contain the following information and meet the following requirements:

If you check “No” to any statement, you must state the reasoning for doing so at the end of this section. If issued a permit, you must be able to affirm each statement by the time the Department determines you to be operational under the Act and regulations.

- The name, address and permit number of the medical marijuana organization receiving the delivery, and the name of and contact information for a representative of the medical marijuana organization.
Pennsylvania Department of Health  
Medical Marijuana Dispensary Permit Application

- The quantity, by weight or unit, of each medical marijuana harvest batch, harvest lot or process lot contained in the transport, along with the identification number for each harvest batch, harvest lot or process lot.

- The date and approximate time of departure.

- The date and approximate time of arrival.

- The transport vehicle’s make, model, and license plate number.

- The identification number of each member of the delivery team accompanying the transport.

- When a delivery team delivers medical marijuana to multiple medical marijuana organizations, the transport manifest must correctly reflect the specific medical marijuana in transit; each recipient will also provide the dispensary with a printed receipt for the medical marijuana received.

- All medical marijuana being transported must be packaged in shipping containers and labeled in accordance with §§ 1151.34 and 1161.28 (relating to packaging and labeling of medical marijuana; and labels and safety inserts).

- Separate copies of the transport manifest will be provided to each recipient receiving the medical marijuana product described in the transport manifest. To maintain confidentiality, a dispensary may prepare separate manifests for each recipient.

- The applicant acknowledges that, upon request, a copy of the printed transport manifest, and any printed receipts for medical marijuana being transported, will be provided to the Department or its authorized agents, law enforcement, or other Federal, State, or local government officials if necessary to perform the government officials’ functions and duties.

**PLEASE PROVIDE AN EXPLANATION OF ANY RESPONSES ABOVE THAT WERE ANSWERED AS A “NO” AND HOW YOU WILL MEET THESE REQUIREMENTS BY THE TIME THE DEPARTMENT DETERMINES YOU TO BE OPERATIONAL UNDER THE ACT AND REGULATIONS:**

Please limit your response to no more than 5,000 words.

**C. PLEASE DESCRIBE YOUR PLAN REGARDING THE TRANSPORTATION OF MEDICAL MARIJUANA AND MEDICAL MARIJUANA PRODUCTS. FOR EXAMPLE, EXPLAIN WHETHER YOU PLAN TO MAINTAIN YOUR OWN TRANSPORTATION OPERATION AS**
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

DOH REDACTED
### Section 12 – Storage of Medical Marijuana

<table>
<thead>
<tr>
<th>A. Storage Requirements</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>By checking “Yes” to any statement, you affirm that the plan of operation will address the below statements:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If you check “No” to any statement, you must state the reasoning for doing so at the end of this section. If issued a permit, you must be able to affirm each statement by the time the Department determines you to be operational under the Act and regulations.</td>
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</table>

- There will be separate, locked, limited access areas for the storage of medical marijuana that is expired, damaged, deteriorated, mislabeled, contaminated, recalled, or whose containers or packaging have been opened or breached, until the medical marijuana is returned to a grower/processor, destroyed or otherwise disposed of, as required by § 1151.40 (relating to the management and disposal of medical marijuana waste).  
- All storage areas will be maintained in a clean and orderly condition and free from infestation by insects, rodents, birds, and pests.
A separate and secure area for temporary storage of medical marijuana that is awaiting disposal will be established.

Please provide an explanation of any responses above that were answered as a "No" and how you will meet these requirements by the time the Department determines you to be operational under the Act and regulations:

Please limit your response to no more than 5,000 words.

B. Please describe your plans regarding the storage of medical marijuana and medical marijuana products within your facility:

DOH REDACTED
Section 13 – Labeling of Medical Marijuana Products

A. Labeling Requirements

By checking “Yes” to any statement, you affirm that the applicant will implement a quality control process to ensure that the label does not bear any of the following:

If you check “No” to any statement, you must state the reasoning for doing so at the end of this section. If issued a permit, you must be able to affirm each statement by the time the Department determines you to be operational under the Act and regulations.

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Any resemblance to the trademarked, characteristic or product-specialized packaging of any commercially available food or beverage product.</td>
<td>☒</td>
<td></td>
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<tr>
<td>Any statement, artwork or design that could reasonably lead an individual to believe that the package contains anything other than medical marijuana.</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>Any seal, flag, crest, coat of arms, or other insignia that could reasonably mislead an individual to believe that the product has been endorsed, manufactured, or approved for use by any State, county or municipality or any agency thereof.</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>Any cartoon, color scheme, image, graphic or feature that might make the package attractive to children.</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>
PLEASE PROVIDE AN EXPLANATION OF ANY RESPONSES ABOVE THAT WERE ANSWERED AS A "NO" AND HOW YOU WILL MEET THESE REQUIREMENTS BY THE TIME THE DEPARTMENT DETERMINES YOU TO BE OPERATIONAL UNDER THE ACT AND REGULATIONS:

Please limit your response to no more than 5,000 words.
DOH REDACTED
### Section 14 – Inventory Management

<table>
<thead>
<tr>
<th>A. Electronic Tracking System</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>You acknowledge that you must use the electronic tracking system prescribed by the Department containing the requirements in section 701 of the Act (35 P.S. § 10231.701).</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>You acknowledge that an electronic tracking system that is approved by the Department will be deployed to log, verify and monitor the receipt of medical marijuana product from a grower/processor, the verification of the validity of an identification card presented by a patient or caregiver, the dispensing of medical marijuana product to a patient or caregiver, the disposal of medical marijuana waste and the recall of defective medical marijuana.</td>
<td>☒</td>
<td>☐</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>B. Inventory Management</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>By checking “Yes” to any statement, you affirm that each dispensary will maintain the following inventory data in its electronic tracking system: If you check “No” to any statement, you must state the reasoning for doing so at the end of this section. If issued a permit, you must be able to affirm each statement by the time the Department determines you to be operational under the Act and regulations.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>- Medical marijuana received from a grower/processor.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>- Medical marijuana dispensed to a patient or caregiver.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>- Damaged, defective, expired, or contaminated medical marijuana awaiting return to a grower/processor or awaiting disposal.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>- Inventory controls and procedures will be established for the conducting of monthly inventory reviews and annual comprehensive inventories of medical marijuana at the facility.</td>
<td>☒</td>
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</tr>
</tbody>
</table>
The written or electronic record will include the date of the inventory, a summary of the inventory findings, and the employee identification numbers and titles or positions of the individuals who conducted the inventory.

Please provide an explanation of any responses above that were answered as a “No” and how you will meet these requirements by the time the Department determines you to be operational under the Act and Regulations:

Please limit your response to no more than 5,000 words.

C. Please describe your approach regarding the implementation of an inventory management process. This approach must also include a process that provides for the recall of medical marijuana products and the management of medical marijuana product returns from you to the originating grower/processor.
DOH REDACTED
DOH REDACTED
Section 15 – Diversion Prevention

DOH REDACTED
DOH REDACTED
DOH REDACTED
Section 16 – Sanitation and Safety

A. PLEASE PROVIDE A SUMMARY OF THE INTENDED SANITATION AND SAFETY MEASURES TO BE IMPLEMENTED AT EACH PROPOSED FACILITY LISTED IN THE PERMIT APPLICATION. THESE MEASURES SHOULD COVER, BUT ARE NOT BE LIMITED TO, THE FOLLOWING: A WRITTEN PROCESS FOR CONTAMINATION PREVENTION, PEST PROTECTION PROCEDURES, MEDICAL MARIJUANA PRODUCT HANDLER RESTRICTIONS, AND HAND-WASHING FACILITIES.

PennStar is committed to bringing the highest-quality medical marijuana products to the patients of Pennsylvania. Internal sanitation and safety procedures are an integral part of this mission and vision. SOPs for sanitation will reflect a rigorous focus on cleanliness, safety, and non-contamination within the facility. The medical marijuana industry has long operated without any oversight in this arena, while other medicinal product manufacturers have been subject to stringent regulations and regular audits to ensure safety and sanitation. This oversight and regulation gives patients the assurance that the products they seek to help them will not harm them. The medical marijuana industry needs this kind of oversight and regulation, so that medicinal marijuana products manufacturers can win the confidence of patients, and deliver effective products.

PennStar looks forward to meeting and exceeding existing standards for safety and sanitation. For guidance, PennStar is looking to Pennsylvania’s Medical Marijuana Act and corresponding regulations, and to procedures established in other states such as Colorado and Washington. PennStar will also be looking to sanitation and safety protocol that has been long standing in the pharmaceutical and supplement industries. Federal law in this regard will offer guidance. Finally, PennStar’s management will be active in the education and development of best practices for sanitation and safety in the medical marijuana industry, by attending conferences and hosting discussions on such topics.

This narrative will cover the SOPs PennStar will implement to maximize sanitation at its dispensary and ensure the safety of its employees and the medical marijuana patients of Pennsylvania. The sanitation and safety plan is designed to limit the potential for contamination or adulteration of the medical marijuana stored in or dispensed at the facility. The narrative has been divided into two parts: (1) Sanitation, and (2) Safety. The Sanitation portion will cover contamination prevention, pest protection procedures, and handler restrictions to ensure sanitation, including proper training of employees. The Safety piece will cover facility safety measures and handler restrictions to ensure the safety of customers and employees, and inspection procedures to ensure the ongoing cleanliness and safety of the dispensary.
PennStar will continually improve and update this plan based on developments in best practices, and will seek to exceed the standards outlined by the Department of Health. With the help of expert consultants PennStar will continually do more to ensure the sanitation and safety of the facility.

**Compartmentalization**
The dispensary site will be designed to ensure that any sanitation or contamination events can be contained. RFID equipped, air tight doorways will separate the waiting, retail, storage and labeling, and office areas. Compartmentalization ensures that if there is a sanitation or contamination incident in one room, it will not spread to other rooms. Incidents of mold, mildew, and pests are examples of situations where compartmentalization is essential.

**Sanitation**
Because medicinal products are to be sold at this facility, PennStar will be holding itself to the same sanitation standards as a pharmaceutical retailer. There will be contamination prevention procedures applicable to the whole facility, and specific procedures applicable to the waiting room, lavatory, medicine room, offices and storage areas. These five areas are critical points of focus for contamination prevention measures. Similarly, there will be building wide pest prevention procedures, and procedures specific to the critical areas. Handler restrictions will model the restrictions applicable to food handlers, including the guidelines outlined in § 27.153. There will also be a plan in place for emergency contamination situations that may require a halt in operations.

**General Cleaning Practices**
The first element of any successful contamination prevention plan must be the cleanliness of the facility. PennStar will implement OSHA standards related to cleanliness, and establish SOPs for cleanliness with the help of expert consultants from either the medical marijuana industry or the pharmaceutical industry.

The facility will be deep cleaned professionally by a third party company specializing in sanitation maintenance for pharmaceutical or supplement manufacturing facilities. Deep cleaning will include structural elements such as lights, beams, vents, grids, and other hard to reach areas.

In between deep cleaning schedules, dispensary managers will be required to establish daily, weekly, and monthly cleaning schedules and train their associates in proper cleaning methods. Equipment and surfaces, including floors, counters, walls, and ceilings, will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the United States Environmental Protection Agency, in accordance with the instructions printed on the label. Only equipment and utensils that are designed in such a way as to be capable of being adequately cleaned will be used in the facility.
Cleaning products authorized and recommended by OSHA will be used to clean the facility, and employees will be required to wear personnel protective equipment (PPE) during cleaning so as to avoid frequent exposure to such products. Whenever cleaning products are in use, there will be no medical marijuana products out in the open, thereby avoiding contamination of such products with cleaning chemicals. In accordance with § 1161.34 (a)(4), toxic cleaning compounds, sanitizing agents, solvents, and pesticide chemicals will be labeled and stored in a manner that will prevent the contamination of medical marijuana and in a manner that otherwise complies with other applicable laws and regulations.

Cleaning products and equipment will be properly labeled and under no circumstances used for any other purposes. All cleaning products will have proper warnings and PPE recommendations on them, as well as emergency procedures in the case of unwanted exposure to skin or eyes. Inventory practices will ensure that cleaning products and equipment will always be adequately stocked. Cleaning products and equipment will be stored in locked compartments completely separate from raw materials, medical marijuana, and medical marijuana products storage.

As is detailed in the waste management plan, and in accordance with § 1161.34 (a)(1), waste will never be permitted to accumulate throughout the facility. Waste will be disposed of in accordance with strict SOPs and waste disposal schedules. Please see Section 15 for more details on Waste Management.

Cleaning Particular to Customer Areas
The qualified medical marijuana patients that visit PennStar’s dispensary will have access to only a portion of the facility: the waiting room, the medicine room, and the restroom. Cleaning practices in these areas will ensure that the facility is clean for the comfort of the patients, and sanitized in order to protect the medicinal products in the medicine room. PennStar’s staff will ensure that patients are always walking into an environment that looks clean and professional, and that they feel confident in the dispensary’s ethos of cleanliness.

The waiting area, medicine area, and bathroom will be swept and mopped by staff at the end of each business day. Surfaces will be dusted, and all furniture and other general use items will be arranged for neatness and safety. The shelves where medicinal products are stored will be cleaned and dusted daily, to protect the cleanliness of the products. Cash registers and other vending equipment will be regularly cleaned and sanitized to prevent the accumulation of dirt and the spread of germs.

Throughout the day, staff will sweep and spot clean based on a cleaning schedule and/or the flow of traffic in the facility—during slower times, staff will seize the opportunity to ensure cleanliness of customer areas. The bathroom will be inspected and cleaned by staff multiple times throughout the day. The bathroom cleaning schedule will be posted on a spreadsheet in order to have employees sign off when they have completed their cleaning duties.
Management will regularly check the cleaning spreadsheet and the cleanliness of the bathroom to ensure that cleaning protocols are being met.

To encourage sanitation among customers, the waiting area, medicine room, and the bathroom will have hand sanitizer dispensers. The bathroom will have a posting about the best way to wash one’s hands to prevent the spread of germs.

Any unusual spills or other sanitation incidents will be immediately cleaned up by staff.

**Cleaning Particular to Storage Area**
The facility will feature a locked, limited access room for the storage of its inventory. Inventory will include medical marijuana products as permitted by § 1151.28(c), and instruments and devices for the use of medical marijuana. The temperature and humidity of the room where the medical marijuana products are stored will be controlled to prevent the development of mold and other possible contaminants.

In accordance with § 1161.33, the dispensary staff will maintain the storage area in clean and orderly condition, and free from infestation by insects, rodents, birds, and pests. The storage room will be swept and mopped at the end of each business day by dispensary staff. The shelves and drawers well medical marijuana products, instruments, and devices are stored will be cleaned and dusted on a weekly schedule. Cleaning schedules and assignments will be posted on a spreadsheet in the storage room, and staff will be required to sign the spreadsheet to verify they have completed their duties. Medical marijuana products and instruments and devices will be stored on separate shelves to facilitate cleaning.

The instruments and devices in inventory will be inspected by staff and carefully cleaned if an accumulation of dust or other contaminants is detected. No food or drinks will be permitted in the storage area, and staff will not be permitted to loiter in the storage area. Pest detection and mitigation procedures are discussed in a later section.

**Cleaning Particular to Offices and Break Rooms**
The dispensary will have offices for human resources and sales professionals, as well as a break room for staff. OSHA standard best cleaning practices for these types of areas will be implemented. Employees will be asked to generally keep the offices and break room clean and orderly, and a third party cleaning company will be engaged to perform bi-weekly deep cleanings of these areas. Employees will be responsible for taking out the trash from these rooms daily. The break room fridge will be emptied weekly. Employees will be trained to clean up spills immediately so as to avoid slip injuries. No medical marijuana products will be permitted to be carried into the offices or break room for any reason whatsoever.

**Visitor Restrictions**
Patient and non-patient visitors (such as inspectors and government officials) will not be permitted to bring outside food or drink into the medicine room. Qualified patients that are
creating undue disorder or unreasonably affecting the cleanliness of the facility and the safety of other patients will be pulled aside by management, and possibly asked to leave. Staff will limit the amount that patients handle packaged medicinal marijuana products.

*Pest Detection and Protection Procedures*

An integrated pest management plan (IPM) will employ several tactics to avoid pest infestation at the facility.

Most basically, the facility will be constructed in a way to prevent pest access. This includes sealing of all cracks and crevices that rodents and other pests may burrow into. The perimeter of the facility will be sprayed regularly by a licensed pest management company. Regulation compliant bait stations will be used at critical locations to control rodents. The main waste disposal area will be sealed off from the rest of the facility and regularly treated for pest prevention. All doorways within the facility will have air tight sealing technology around their perimeter to avoid cross contamination between rooms, and also to prevent the spread of a possible pest infestation from one room to another.

PennStar will contract with a licensed pest management company to perform regular pest protection procedures within the facility. The facility will have onsite at all times a copy of the contract between PennStar and the pest management company describing the services to be performed, the chemicals and methods to be used, all applicable precautions, and chemical safety data required by local, state, and federal regulations.

A record of all services performed by the pest management company will be kept on file and regularly updated. Such records will include documentation of all pesticide applications, including the date and time of application, the pesticide applied, and the area treated. Such records will be signed and certified by the applying professional.

PennStar will train all employees on the visual identification of problem pests and the most up to date pest management practices specific to medical marijuana products storage. They will regularly perform visual inspections in the storage and medicine rooms to ensure there are no pests in the facility, including common pests such as ants or flies. Employees will be required to file documentation of any pest sighting, including common pests. These incident reports will be immediately investigated by management. Trash cans throughout the facility will have lids, so that refuse is never out in the open in the various rooms.

Regulation compliant flying insect monitors will be used within the facility, especially the storage area. These units will be cleaned at least once per week. They will be nontoxic and placed a safe distance from all products, product handling surfaces, and customer frequented areas.
Chemicals designed to eradicate pests will never be used around medical marijuana products, instruments, or devices. These items will be cleared from the area prior to any pest control chemicals are used.

**Handler Restrictions**

All personnel involved in the handling of medical marijuana products (henceforth collectively referred to as “handlers”) will comply with Good Handling Practices (GHPs) and Good Sanitary Practices (GSPs). Such personnel will be subject to all regulations in 28 Pa. Code 1161.34 (b), and the restrictions on food handlers in 28 Pa. Code § 27.153, relating to diseases and conditions that must be eradicated before one can safely handle food.

Only designated and properly trained personnel will be permitted to handle medical marijuana products.

Handlers will be required to maintain adequate personal hygiene. They will be required to wash their hands before starting work and at any time in between handling when their hands may have become soiled or contaminated. Before dispensing medical marijuana products, handlers will be required to wash their hands and wear gloves.

**Hand-Washing Facilities**

Hand washing facilities will be conveniently located throughout the facility according to good sanitary practices, and maintained according to 28 Pa. Code. § 1161.34 (c). Water in the facilities will be of a temperature appropriate for washing and disinfecting hands. The facility will always have a water supply sufficient for its operations, derived from a source that is a public water system, or a nonpublic system that is capable of providing a safe, potable, and adequate supply of water to meet the operational needs of the facility. Effective nontoxic sanitizing cleansers and sanitary towel service or suitable drying devices will be provided. Each hand washing facility will have easy to understand instructions with images explaining the most effective handwashing techniques.

Handwashing facilities in the storage room, medicine room, and bathroom will be used only for handwashing, and not for any other sanitation needs. There will be separate industrial sinks in the cleaning supply closet and the employee break room for non handwashing needs such as rinsing or disposing of any simple liquid waste.

Employees that are found not adhering to GHPs will be reprimanded, retrained, and may be terminated. Employees will be encouraged to monitor each other and remind each other about GSPs and GHPs. Personnel will be encouraged to use the anonymous tip system to report deviations from GSPs and GHPs. Such tips will be immediately investigated by management.
Emergency Response Preparedness

With the help of expert third party consultants, PennStar will have an emergency preparedness plan in the case of a major sanitation event requiring a shutdown of operations. All personnel, including administrative and maintenance personnel, will be trained in emergency preparedness. The facility will periodically conduct emergency response drills that will mimic an actual emergency situation response as closely as possible without disrupting cultivation activity.

This plan will be designed to respond to things like infestations of mice, rats, or other pests, sewage backups, fires, leaks, and other situations. Performance in these drills will be audited by management or a third party expert in emergency response. Emergency response protocol will regularly be updated to reflect industry best practices.

The emergency response manual will be on hand in all departments, in a conspicuous location with easy to read instructions and bold images. Signs will be posted outside the facility to alert customers to the temporary closure.

Safety

Building Safety

This proposed dispensary is being designed with the utmost attention to the safety of PennStar’s employees, patients, and the surrounding community. The facility is being designed by experts in medical marijuana dispensary design, and the most up to date safety features will be implemented.

For internal safety measures, PennStar will meet and exceed the applicable OSHA laws and regulations, and local and State occupational safety laws and regulations. PennStar will accomplish this by consulting with occupational safety experts to develop occupational safety protocol, inspect the facility regularly, and update design and protocol as needed.

Externally, all roads, yards, and parking areas will be maintained in good working order and free of dust, standing water, and potential contaminants. All roads, yards, parking areas, and roof surfaces will have proper drainage channels.

The interior of the facility will be designed to meet and exceed the requirements of the Americans with Disabilities Act and applicable local and state accessibility regulations. All corridors and doorways will at all times be kept free and clear of obstructions and trip hazards. Floors will be kept clean and in good repair. Spills will be cleaned and dried immediately. All interior areas of the facility will be adequately lit and feature emergency lighting.

Proper ventilation throughout the facility will ensure the comfort of employees, patients, and other visitors, and will maintain the quality of the inventory in storage. All air filters throughout the facility will be regularly inspected, cleaned, and replaced to ensure that air is...
free of mold and other contaminants. Any air blowing equipment will be kept in safe working order and cleaned regularly to avoid the blowing of debris and dust.

Fire suppression technology, including sprinklers and fire extinguishers, will be placed throughout the building in accordance with local and State Fire Code requirements. All employees will be trained in emergency fire response, and the entire team will be subject to regular and random fire drills.

Managers will perform regular audits, or safety checks, by visually inspecting the interior of the facility and observing personnel to ensure proper performance of safety and sanitation measures. Audit results will be documented; any deviation from standard protocol, or identification of safety hazards will be documented, investigated, and escalated.

**Internal Audits**

To ensure the safety of the facility, PennStar managers and employees will perform regular internal audits of the facility and cleaning protocol to identify any hazards and areas for improvement. Master inspection schedules will be created by a designated manager or executive.

Employees from will be required to participate in the safety audits. The inspections and any notes and action items will be logged in a binder and later in an electronic database. Notes from each inspection will be sent to designated managers, who will inspect and implement changes as needed.

The inspections will include all corridors, workspaces, and storage areas of the facility and all operational equipment including computers, electronic equipment and all scales, balances, and other measuring devices.

Third party inspections will be scheduled throughout the year, wherein a consulting company with expertise in marijuana dispensary facilities will walk through the facility and inspect the entire facility, including the storage area and offices. The consultants will also audit the safety instruction manuals to identify possible improvements to safety protocol.

Finally, PennStar will always allow state inspectors to walk through the facility as required by law. PennStar will also work with a regional OSHA On Site Consultation program to verify its compliance with all applicable health and safety regulations. Both expert auditors and state inspectors will be required to comply with visitor protocol as described here and in the Diversion Prevention plan.

**Conclusion**

Medical cannabis patients in Pennsylvania deserve to know that their medicine is safe; sanitation and safety is an area where the medical cannabis industry stands to benefit from
regulatory oversight. PennStar’s Philadelphia County facility will lead the way in sanitation and safety for the medical cannabis industry in Pennsylvania. The company and its team look forward to meeting and exceeding regulatory requirements related to sanitation in the facility. PennStar will use pharmaceutical industry standards as a guide. By ensuring a safe and sanitary workplace, PennStar can ensure the health

Section 17 – Recordkeeping

A. PLEASE PROVIDE A SUMMARY OF YOUR RECORDKEEPING PLAN AT EACH PROPOSED FACILITY LISTED IN THE PERMIT APPLICATION. THIS PLAN SHOULD COVER, BUT IS NOT LIMITED TO, RECORDS OF INVENTORY AND ALL DISPENSING TRANSACTIONS:

Business success depends in part on dedicated and thorough recordkeeping procedures. This is as true for a medical marijuana dispensary as for any other retail business, if not more so because of the regulatory oversight on medical marijuana dispensaries. PennStar’s recordkeeping plan will track all internal operations at its dispensary, and ensure the safety and quality of the medicinal marijuana infused products available to patients and caregivers of the dispensary. Inventory tracking and sales analysis will help the dispensary ensure that patient and caregiver needs are always being met; advanced tracking software will track products from the grower/processor to PennStar’s dispensary, and organized business administration records and SOPs will help ensure the smoothest possible operations at the dispensary.

Critical points in the dispensing process, facility maintenance, and inventory tracking and transportation are mentioned throughout this application packet. This narrative will describe in more detail a number of recordkeeping systems that will be in place at this dispensary. The recordkeeping plan has been designed with the guidance of industry professionals with nationwide experience. It meets and exceeds current industry best practices and the requirements of the applicable Pennsylvania statutes and regulations.

All personnel will be rigorously trained and retrained in the recordkeeping protocol. The Learning Management System (LMS) will allow management to quickly disseminate updates to the recordkeeping protocol and verify that employees have been evaluated on their understanding of the protocol.

Employees will be regularly audited to ensure compliance with recordkeeping procedures. Managers from the different production departments of the facility will be required to ensure that records in their departments are being accurately and regularly created. They will also be responsible for compiling periodic reports summarizing activity in their department. A senior manager will be responsible for reviewing and updating recordkeeping procedures to
keep up with industry standards, and to ensure that the Department of Health and other interested departments are provided regular reports of activity within the facility promptly upon request.

The following is a list of functions that will be tracked and recorded at the facility:

- Business Administration
- Accounting
- Employment/Employee Information
- Regulatory Inspections
- Active Inventory of Medical Marijuana Products
- Back Stock Inventory of Medical Marijuana Products
- Medical Marijuana equipment and devices
- Incoming Shipments
- Pest Detection and Mitigation Efforts
- Voluntary and mandatory product recall events
- Master Cleaning Schedules
- Transport
- Equipment Maintenance
- Labeling and packaging requirements
- Standard operating procedures
- Patient identification and other records

**Inventory Recordkeeping**

In accordance with 28 Pa. Code § 1161.39, PennStar’s dispensary will use the electronic tracking system prescribed by the Department. The tracking system will meet the requirements of 35 P.S. § 10231.701. PennStar’s management will monitor the Pennsylvania Bulletin for notification of the preferred electronic tracking system, and will immediately implement the system and train all of its employees in its use.

As soon as inventory is received, individual packages will be given an RFID tag and UPC barcode. The RFID tags and barcodes will be scanned into the inventory management software, and then placed in storage bins in the storage room. Storage bins will be categorized based on the product inside. Any time that products move from the bins in the storage rooms (back stock inventory) to the shelves in the medicine room (active inventory), the RFID and UPC barcodes will be scanned, updating the back stock and active inventory levels in the software.

Active inventory will be counted on a daily basis. Inventory procedures have been designed to verify that electronic inventory records match physical inventory records, including sales records. Inventory will be counted at the end of the day by dispensing staff, and inventory levels will be entered into the inventory management software. The next day’s opening dispensing staff will be required to verify active inventory numbers with the previous day’s
report before the dispensary opens each day. Any incident of a discrepancy in inventory levels will be documented and escalated for investigation. Management will be required to document a resolution to each investigation within 1 week.

Back stock inventory reviews will be conducted on a monthly and annual basis. Annual reviews will be comprehensive and reported to the Department in a manner prescribed by the Department. GeoShepard’s notification system schedules and tracks monthly and annual reviews. The system will notify PennStar Medical staff of upcoming reviews and, via the escalation system, notify management when reviews have not been completed. All notes and review data will be stored on the GeoShepard System which is accessible by regulators at any time.

Batches of product will be inventoried by hand scanning barcodes of each product or case, at which point the software has the ability to compare current physical inventory versus last recorded (expected) inventory.

Monthly checks will include:
- The number, weight, and type of medical marijuana products;
- The amounts, types, and forms of medical marijuana received from a grower/processor;
- The number of medical marijuana products ready for sale;
- The amounts, types, and forms of medical marijuana dispensed to a patient or caregiver; and
- The number of damaged, defective, expired, or contaminated medical marijuana awaiting return to a grower/processor or awaiting disposal.

Only management level employees with the proper clearance will be permitted to conduct inventory reviews. Inventories will only be taken during non-business hours, so as to avoid confusion and miscounting as products are being sold during business hours.

Monthly and annual inventory reviews will be printed and stored as physical records, as well as maintained in the system as electronic records.

Other Inventory
Other types of inventory that will be tracked includes:
- Medical marijuana instruments and devices
- Packaging materials
- Miscellaneous office material
- Cleaning supplies
- Hygienic supplies (toilet paper, soap, etc.)

Patient Intake and Dispensing
In accordance with 28 Pa. Code § 1161.23, PennStar will never dispense medical marijuana products to a patient or caregiver without first verifying their valid identification card and most recent certification through the electronic tracking system. PennStar will not store patient certifications or records in either the dispensary’s network or computers, or retain any physical copies of certifications beyond the time needed to create and file a receipt for the immediate transaction.

Before patients and caregivers may begin purchasing medical marijuana products from PennStar’s facility, they will have to show identification and proper certification. An employee will sit behind a computer in the waiting area to welcome customers and verify that they are qualified to purchase medical marijuana products before they can enter the medicine room. The employee will verify that the potential customer is a qualified medical marijuana patient by accessing the Department of Health’s online database using the Department prescribed electronic tracking system, which PennStar will install at this facility. Patient identifications will be matched against the online database.

The employee will also check for any practitioner recommendations, requirements or limitations. If any are found they will be printed and provided to the dispensing employee/cashier in the medicine room. If no recommendations are found on file, patients will be required to consult with the onsite physician, pharmacist, physician assistant or certified registered nurse practitioner. Any resulting recommendations will be given to the dispensing employee and updated in the Department’s database using the electronic tracking system. These physical copies will be destroyed after the transaction is completed, and no copy will be maintained on the facility’s own network.

When a qualified patient is prepared to purchase his or her medicine, the dispensing employee will create a receipt of the transaction and, using a computer in the medicine room, file the receipt information in the Department’s online database using the electronic tracking system. In accordance with the applicable regulation, these receipts will include the dispensary’s name, address, and permit number; the name and address of the patient and, if applicable, his or her caregiver; the date of the transaction; any requirements or limitations that may have been noted by a practitioner; and the form and the quantity of medical marijuana dispensed.

A copy of the receipt will always be offered to the patient, but never stored by PennStar staff. If, after the receipt is entered into the system, the patient declines his or her copy of the receipt, it will be immediately shred by the dispensing employee.

For the purposes of sales analytics, PennStar will keep a log of each day’s sales transactions, including number of sales and items sold. These logs will be completely anonymous, with no way to link the individual transactions to individual patients.

**Employee Training in Dispensing Procedure**
Employees hired to work as dispensers will be rigorously trained and tested on the above procedures. The dispensing protocol will be available for employee review in PennStar’s Learning Management System (LMS). Any updates to such protocol created by management or imposed by new regulations will be available in the LMS, and employees will be required to review changes and/or watch tutorials and pass an evaluation before they can start their next shift after the changes take place.

Records of completed trainings will be kept in each employee’s physical and electronic file, as detailed below in the employment section. PennStar’s human resources department will be responsible for maintaining these records.

Visitor Logs
While the majority of non-employee traffic to the dispensary will be by qualified patients and caregivers, at times inspectors, maintenance professionals, service providers, and consultants may require access to limited access areas of the facility. As outlined in 28 Pa. Code § 1161.30 (d), all visitors requiring access to limited access areas will be required to sign a visitor log. Visitor logs will be maintained onsite in digital and physical format for four years and will be made available to the Department, State or local law enforcement and other State or local government officials upon request if necessary to perform the government officials’ functions and duties.

Visitors will be required to provide their government issued identification. A PennStar employee will scan the identification and retain the photocopy with the visitor log. Visitor logs will ask for the full name of each visitor, the visitor’s identification badge number (to be issued by the intake employee), the time of arrival, the time of departure and the purpose of the visit, including the areas visited, the name of each employee visited, and the name of the escorting employee.

Recalled Medical Marijuana
As a vendor of health products, PennStar will be vigilant in ensuring that no recalled medical marijuana products are made available to customers. The procedure for tracking recalled medical marijuana products, and actual instances of recalled medical marijuana products, will be part of the recordkeeping protocol at the facility. Employees will have access to this protocol via the LMS, and will be regularly evaluated on their knowledge of the protocol and any updates to the protocol.

In accordance with 28 Pa. Code § 1161.38, the dispensary will immediately notify the Department of Health and the relevant grower/processor of any complaints made to dispensary employees by a patient, caregiver or practitioner who reports an adverse event from using medical marijuana dispensed by the dispensary. These reports will be logged electronically. If a grower/processor contacts the dispensary about a recall in compliance with § 1151.42 (mandatory recalls), all dispensing staff will be immediately alerted to cease dispensing the affected products. Such instances will also be logged electronically.
The dispensary will require the grower/processor initiating a recall to provide the dispensary with the following information about the recall:

1. The Recall Coordinator’s name and ID
2. Product type and form affected
3. The date and time of the recall
4. The total amount by weight or unit of recalled product, identified by harvest batch, harvest lot, or process lot
5. The reason for the recall (including whether it is voluntary or mandatory)
6. The date and time the recall was reported to the DOH or the public
7. Health risk information
8. Return instructions

This information must be provided in physical and digital format, and will be kept on hand in the electronic tracking system and inventory management system for at least four years.

The dispensary will notify its patient customers of product recalls confirmed by the grower/processor and the Department of Health. Notices outlining the products recalled, the reason for recall, and any potential health risks will be posted in the facility. Copies of such notices will be kept on file for at least four years.
DOH REDACTED

DOH REDACTED
Record of Vendor and Service Contracts

PennStar management and accounting staff will cooperate to ensure that all contracts with outside vendors or service providers are on file in the facility, up to date, and easily accessible. Contracts will be kept in both electronic and physical formats. An aggregated, current list of vendors and service providers will also be on hand in the business administration offices of the dispensary.

The dispensary will likely contract with the following types of vendors and service providers:

- Licensed grower/processors
- Transport companies
- Security consultants
- IT consultants
- Plumbers/Electricians/HVAC professionals
- Cleaning services
- Other maintenance providers
- Pest management professionals

PennStar will only purchase medical marijuana products from State licensed grower/processors. Management will ensure that, for each existing and new grower/processor that PennStar does business with, there will be a corresponding file with a copy of their current State license, contact information for their facility and a designated point of contact, and a record of all transactions conducted with that grower/processor. PennStar will refuse to do business with grower/processors who cannot provide a current and valid State license.
PennStar will also maintain contracts for all other vendors and service providers. For each of the vendors or service providers, contact information for a designated point of contact and transaction information will be kept on file and up to date. Such records will be made available to the Department upon request.

**Waste Disposal**

Waste disposal protocols are detailed in the Waste Management plan and the Sanitation and Safety Plan. Employees will be trained in the detailed waste tracking and disposal protocol. The type of waste, amount, date, and time of disposal will always be logged manually and digitally. When a third party waste management company picks up the waste, the contracting professional will be asked to sign a disposal manifest to confirm receipt of the waste.

Dispensary management will create waste disposal schedules for waste throughout the facility. When an employee is responsible for cleaning a particular area, such as the lavatory or waiting room, they will sign off on the posted schedule, thus indicating that all waste has been taken to the main disposal dumpsters.

**Labeling and Safety Inserts**

PennStar is committed to ensuring that all the medicine available at its facility meets the Department’s content and testing requirements, and that all relevant information about the products is made available to qualified patients in an easily readable and understandable format.

When the dispensary receives a shipment of medical marijuana products, inventory managers will be required to certify that the labels on the products meet the requirements of 28 Pa. Code § 1161.28. Inventory managers will certify this by checking boxes on a standard sheet; boxes will correspond to the various labeling requirements, including things like “label is easily readable,” “label is conspicuously placed on the package,” “label contains warning statement,” etc.

Dispensary managers shall ensure that Department approved product safety inserts are always on hand in the dispensing area, and that they include the information listed in § 1161.28 (e). Dispensers will be required to provide all qualified patients with the product safety inserts and answer any questions the patient may have about information on the insert.

To ensure that product safety inserts are being distributed for every sale, sales managers will be required to document the number of safety inserts on hand in the medicine room at the beginning of the day, and the number left at the end of the day. Sales managers will have to certify that the number of safety inserts used matches the number of recorded sales that day. If a discrepancy is discovered, management will investigate, adjust protocol, and make
other changes as necessary. Investigations and changes to sales protocol will also be documented and retained by HR.

**Facility Cleaning and Maintenance**
As described in the Sanitation and Safety plan, the facility will be on a master cleaning schedule which will include deep cleanings by professional cleaning services, and daily, weekly, and monthly cleanings by staff. Cleaning schedules for every cleaning function will be posted within each room of the facility (except not in plain sight of patient customers). The schedules will have a space for the employee performing the cleaning to sign off that the cleaning task has been completed. Using the cleaning logs, managers will be able to quickly identify who performed which cleaning tasks, and when. Thus, if a deviation from cleaning protocol is discovered, the responsible employee will be made aware and retrained if necessary.

Cleaning of the inventory storage room will be done under the supervision of a manager with proper clearance and credentials.

Equipment and building maintenance logs will be populated with information regarding any maintenance performed (including the reason for the maintenance and the specific procedure performed). The maintenance logs will include information regarding the maintenance professional performing the service, their employer, and the professional’s qualifications. Maintenance professionals will be asked to sign their name on the maintenance logs to verify performance of the service. Facility maintenance reports will be stored in digital and physical format, and be readily available for Department inspection.

Any pest mitigation maintenance will be thoroughly documented in compliance with local, State, and Federal laws. PennStar will only contract with certified pest mitigation professionals, and will maintain copies of such certifications on file. If pesticides are applied, they will be applied according to standards applicable to pharmacies, so as to ensure that any medicinal products, or medical marijuana instruments or devices are not affected. Managers will generate reports on pesticide applications, and pest control professionals will sign the reports to certify their involvement.

Maintenance records will be kept on file by facility managers for at least four years.

**Employee Records**
In order to develop and retain the most qualified team at this dispensary, and to ensure that staff is meeting the needs of PennStar’s qualified patients, Human Resources will keep detailed records of recruitment efforts, employee and compensation information, employee training, certifications, disciplinary actions, and clearance information.
Job descriptions will be maintained by HR, and regularly reviewed and updated with feedback from management to ensure that the descriptions reflect the essential duties and responsibilities actually being performed by employees in that position.

Recruitment efforts will be documented to show where recruitment activity is taking place and the individuals that are contacted during recruitment. Recruitment methods will be analyzed to ensure that the goals outlined in the diversity plan are being met.

Results of background checks and other application materials will be kept on hand by HR. Training procedure manuals will be created and kept up to date by HR in cooperation with cultivation and processing managers. Training records and the LMS will show which employees have completed which trainings and the dates of completion. As described throughout this narrative, any evaluations completed in the LMS will be kept in a digital file and in the employee’s individual file.

For all active employees, HR will maintain a copy of the employee’s Department of Health license to work in the facility, results of performance evaluations, and records of any warnings, citations, or other disciplinary actions taken.

For licensed physicians, pharmacists, physician’s assistants, or certified registered nurse practitioners hired by PennStar to work at this or future dispensaries, human resources will maintain copies of medical licensure issued by the Pennsylvania Department of State, Bureau of Professional and Occupational Affairs, including date of expiration and renewal requirements. If a medical professional’s licensure is expired, they will not be permitted to report to work until renewal of their license is completed. Medical professional records will also include confirmation that the professional has completed the Department’s four hour training course, as required by 28 Pa. Code § 1161.25 (c).

Administrative Records
PennStar’s human resources department will be responsible for maintaining standard administrative records. These records will document the day to day administrative operations of the facility. Such operations to be tracked include:

- Records of liability insurance and other policies related to the business
- Government communications
- OSHA records (including OSHA 300 Logs)
- SOPs
- Public inquiries
- Staff meeting minutes

Inspections and Audits
Regular inspections will be conducted by managers, outside consultants, and State government inspectors. The facility itself, its equipment, its protocols, and personnel
Performance evaluations are among the things to be regularly audited. A master inspection schedule will be developed by management. Detailed notes about each instance of inspection will be logged and made available to the Department of Health upon request.

**Compliance Reporting**

PennStar will comply with regular reporting requirements established by the Pennsylvania legislature in 35 P.S. 10231.701. Specifically, within a year of the issuance of the permit, and every three months thereafter, PennStar will provide the Department with the following information:

1. The amount of medical marijuana purchased in the preceding one year or three month period;
2. The per dose price of medical marijuana purchased by the dispensary, in a unit of measurement as determined by the Department;
3. The per dose price of an amount of medical marijuana dispensed to a patient or caregiver by the dispensary, in the unit or measurement determined by the Department.

PennStar will provide this information in the form and manner prescribed by the Department.

Management will compile regular reports for the executive team. These reports will include sales data, operational costs data, and any other information deemed important by the executive team. The reports will be used internally to ensure that PennStar is meetings its responsibility to provide the highest quality product to the qualified medical marijuana patients of Pennsylvania. These reports will be made available to the Department upon request.

**Conclusion**

PennStar’s recordkeeping process will be thorough and exceed the requirements of applicable regulations. There will be data gathered at every place in the facility and at every phase of operation. Accurate recordkeeping and data analysis has been absent in the medical marijuana industry until now. Records, data, and regular reporting are essential in order to properly serve the interests of patients in Pennsylvania, and help local regulators oversee the medical marijuana program. PennStar looks forward to working with the Pennsylvania Department of Health and other State regulators to help them better understand the medical marijuana industry. By working together, business and government can better meet the needs of Pennsylvania’s qualified medical marijuana patients.
PennStar Medical has amassed a talented team of technical and management partners who will be responsible for designing, setting up, and launching PennStar’s operations upon award of a license. These technical partners are some of the leading, most successful companies in the cannabis industry today. PennStar has taken the unique approach of engaging experts from each of the key areas of operations, in lieu of one company that does it all. These firms are the best of the best at what they do and will bring concentrated expertise to their areas of responsibility. One might liken the PennStar approach to the space program, where some the nation’s top industrial enterprises combine to jointly operate the program.

PennStar has a technical partner for each of the following areas:

1. undisclosed
What sets this arrangement apart is that PennStar’s partners will not be simply consultants—they will come to Pennsylvania and develop and launch PennStar in a hands-on fashion. The partners will set up the company, get it running in high gear and phase out gradually as management and staff become proficient. This model fits within the PennStar objective to becoming an ultra capable minority owned and operated company that is managed and staffed mostly with local residents. A coalition with some of Colorado’s best has been formed to achieve that goal. It is also a model that can be duplicated elsewhere.

During the set up and design phase the technical partners will perform the following tasks:
1. Plan and design facilities
2. Acquire and install equipment
3. Set up plant and shops
4. Hire and train management
5. Hire and train staff
6. Establish standard operating procedures
7. Implement management control systems
8. Implement financial control systems

Once the facilities are completed, the technical partners will join together to launch and manage one of the most dynamic and competent ventures in the industry. PennStar will certainly stand at the top of the line as far as any startup is concerned.

**Technology Transfer**

As a minority owned company, a core objective of PennStar is the diversity of its management and workforce. One of the main advantages of having the outstanding core of technical partners is technology transfer. PennStar will bring in the experts to pass on cannabis technology to local workers and managers. There is a broad array of stable, well-paying jobs and careers in the cannabis industry. The PennStar partners will transfer their expertise PennStar’s local management and technician trainees. The PennStar model may be duplicated for other licensees in Pennsylvania as well in other states. Colorado comes to Pennsylvania to develop skilled cannabis managers and workers.

PennStar’s long-range plans include establishing a cannabis training institute that will train management technicians, who are then hired by cannabis companies throughout the Commonwealth. The Greenstar Cannabis Academy will be set up in the same building that houses the company’s grow/processor facility.

PennStar Medical’s ability to maintain an operation that goes above and beyond both operationally and financially is best demonstrated by the unparalleled level of experience of our leadership and technical partners. These partners have been an active part of the application process—providing support and issue-area expertise to all aspects of PennStar’s plan to launch and operate efficient, compliant operations. PennStar’s management and
technical partners give the company the ability to operationalize the plans outlined in this application in a timely manner and make PennStar a leader in Pennsylvania’s medical marijuana industry.

In summary, PennStar has formed a coalition of top cannabis business to establish and initially help operate the company. It is important to note that none of these companies have any financial stake in PennStar Medical, LLC, nor any involvement in corporate management and financial control. They are remunerated on a contractual basis.

**Top Management**

*Darryl Hill, Chief Executive Officer*

Darryl Hill is a creative and successful entrepreneur who has developed viable business enterprises and joint ventures worldwide. He is a dynamic and exceptional administrator, specializing in business development, finance, and fund raising. Mr. Hill is currently the President of TilStar, LLC, which holds a dispensary license in Maryland and is competing for grower and processing licenses in Maryland.

Mr. Hill also serves as Managing Director of TW Capital Group, a boutique advisory firm headquartered in Washington, DC, with offices in Boston and Los Angeles. TW Capital Group is an integrated ecosystem of business services that specializes in providing a range of unique services in mergers and acquisitions; investment banking advisory; strategic planning; law and global services to start-up, micro-cap, and mid-size firms. Mr. Hill is a corporate principal who specializes in business debt and equity capital acquisition, and business organization and strategic planning.

Mr. Hill is no stranger to navigating new industries and breaking barriers. A native of Washington, DC, he became the first African American to play football at the U.S. Naval Academy. He later transferred to the University of Maryland, and became the first African American player in the school’s history, in the Atlantic Coast Conference—and the first African American to play any sport at any major college in the South.

In his career after football, Mr. Hill went on to become a leading advocate of community economic and minority business development. He served as the Executive Director of the Anacostia Economic Development Corporation and the Greater Washington DC Business Center. Mr. Hill was the founder and first chairman of the National Minority Supplier and Diversity Council. He was responsible for assisting and financing over 2,500 minority-owned businesses during the 1970’s and was the recipient of several awards and commendations for his work for minority enterprise. Mr. Hill founded and capitalized the first publically funded Minority Enterprise Small Business Investment Company (MESBIC) in the nation.

Marking another first in 1977, Mr. Hill opened W.H. Bone & Company, the first mainstream, African American–owned fine dining restaurant in the country, located in Washington, DC. He then went on to develop and open two other fine dining restaurants featuring southern cuisine—The Savoy in Washington, DC and Wildwood in Atlanta, Georgia.
Outside of the U.S., Mr. Hill ventured abroad to build roads in Nigeria, and later formed Northstar International, becoming one of the first independent American small businessmen to purchase a major Russia manufacturing operation—Novosibirsk Optical Company. Mr. Hill has built a joint venture in forestry and timber operations in Siberia and Brazil, and was involved in the formation of a joint venture in paperboard packaging with a major Chinese enterprise.

As CEO of PennStar Medical, Mr. Hill wants to continue to break barriers and aims to bring diversity and his decades of experience to Pennsylvania’s newest industry.

**Dr. Craig Thomas, Chief Medical Officer**

Dr. Craig Thomas is a Board Certified, nationally renowned Orthopaedic surgeon, born and raised in Philadelphia. Prior to medical school, Dr. Thomas worked as a medicinal organic chemist in the Philadelphia region with Merck Sharp and Dohme. His background of designing and extracting compounds to be used for future medication, combined with his medical training and current practice set the stage for his interest and understanding of the medicinal benefits of cannabis.

In addition to his Orthopaedic surgical practice, Dr. Thomas has a particular interest in the non-surgical management of Orthopaedic conditions like chronic back pain and neurogenic pain. He currently collaborates with a group of former NFL players advocating for the use of cannabis as an accepted treatment for pain and cerebral injuries. He has collaborated with an international nutraceutical pharmaceutical company in the specific area of opioid addiction to help further the advance the field of medicinal cannabis as a viable treatment alternative.

Dr. Thomas will be leading PennStar’s medical operations, heading an ethnically diverse team of medical professionals that includes:

- Dr. John Dembrowski, a Board Certified Anesthesiologist with a specialization in chronic opioid addiction who currently serves as the medical director of the Washington Pain Center.
- Ulander Craig, RN, MBA, a decorated veteran of the US Navy who served as a battlefield MEDVAC nurse and has over 25 years of healthcare experience.
- Dr. Cheryle Baptiste, a Board Certified dentist who focuses on chronic dental conditions and is a leader in her field regarding treatment of these conditions with the use of medical cannabis.

**Alec Anderson, Chief Technical Officer**

With 26 years of experience in hydroponic systems, Alec Anderson is considered to be one of the highest-level experts in his field. The early milestone that encouraged his continued development in cultivation was the germination and cultivation of the genotype of cannabis that became known as the “OG Kush,” one of the most famous strains in the world. He is currently the owner and president of Alexander James Consulting, LLC and a partner in Tilstar, LLC, a recent awardee of a stage 1 Maryland dispensary license. He also holds a “Key Badge” Occupational License in the state of Colorado to operate Cannabis businesses.
In 2010, Mr. Anderson moved to Colorado to be a partner/investor and help launch Freedom Wellness, a medical cultivation facility. Soon after the company merged with Mile High Wellness, a prominent dispensary, which then became known as The Cannasseur. During this time, he also helped to build the company’s cultivation facilities, 10,000 square foot and 13,000 square foot warehouses, implementing environmental automated systems that controlled lighting, CO2 enrichment, irrigation, humidity, and temperature. Once operational, he maintained cultivation aspects of the facility including hiring of employees, training, clone propagation, vegetative growth cycles, flower growth cycles, harvesting to curing. Once cured, he handled inventorying, weighing, and packaging the product for distribution. In the company’s dispensary, he maintained an integral role in the storefront’s day-to-day operations.

In 2012, Mr. Anderson went to work for 420 Wellness, one of Colorado’s largest dispensaries, where he was responsible for running a 20,000 square foot cultivation facility. That same year, he won 2nd place in the Cannabis Cup with the strain “Kurple Fantasy,” and had his products featured in *High Times Magazine*—“Kurple Fantasy” for the Cannabis Cup and “Bubba Kush” for Pix of the Crop.

Mr. Anderson has designed, built and operated every type of hydroponic system, including ebb and flow, drip, drain to waste, DWC, Undercurrent, NFT, aeroponics, and manual watering systems. He has designed and manufactured his own LED systems for proprietary commercial use and designed his own nutrient system specifically for cannabis. As an operator and consultant, he has implemented training programs to quickly and effectively bring staff up to speed in workflow, efficiencies, and technology of commercial cannabis production and operation. It is though this multiplexed diversity that he has become well known as a leader in the cannabis industry.

**Technical Partners**

*GeoShepard*

GeoShepard, Inc. started over four years ago as a personal asset tracking business. The company pivoted to the cannabis industry in 2015 to bring its proprietary and patented technology to cultivators. Their mission is to help cultivators increase the accuracy and efficiency of data entry into the state regulated systems. GeoShepard’s unique tracking, weighing, and transit system is the only one in the Cannabis industry, providing an evolved alternative to the cannabis industry’s standard onsite hardware and software systems that require extensive manual labor. These antiquated systems demand individual plant by plant hand recording utilizing non-reusable tags, while GeoShepard’s solutions do not.

GeoShepard’s three product lines tackle the key pain points for cannabis cultivators:

- **GeoTrack™** utilizes a network of Wifi-connected hubs to wirelessly transmit plant location data via Bluetooth beacons, thus allowing for automatic and real time updates of location data to the state system as well as situational notifications to the cultivator of anomalies.
- **GeoScale™** automates the weighing of Cannabis plants, waste, and products. The GeoScale™ Bluetooth adapter connects to any RS-232 port common on most scales and relays weight data to the GeoScale™ application. The application scans and
marries the unique plant identifier to the weight, which increases accuracy of data entry.

- The GeoRoute™ solution tracks the package in transit. It notifies, in real-time, when a package has gone missing and is no longer in the vehicle. GeoRoute™ marks the last known location of the package on a map and provides a report to state regulators and the cultivator.

All of GeoShepard’s solutions save cultivators time and money. They increase accuracy to 100% and save a typical grow $100,000 in labor costs annually—or an estimated 10% of operations execution. The company’s current clients have seen a reduction of manual data entry mistakes by 90% and reduced the time spent performing data entry by 75%. This has allowed GeoShepard’s customers to reduce staff and stay competitive in the marketplace, while also benefitting regulators by reducing audit times. Other operational benefits in addition to cost saving include:

1. **Time to deployment**: SaaS software solutions can be implemented in a matter of weeks rather than months.
2. **Less internal responsibility**: The Cloud Service Provider (CSP) is responsible for maintaining the software, upgrading the system and maintaining customization through upgrades.
3. **Scalable and Flexible**: Cloud technology can be scaled up or down to meet your business needs, meaning starting up costs are substantially lower when compared to on-premise solutions. As companies grow, the software is fully scalable. SaaS software also allows more flexibility to integrate with existing software interfaces.
4. **Anywhere Access**: Cloud technology only requires a browser and internet access to connect. This makes mobile access, remote working, and the sharing of information easier than ever.
5. **Resilience**: IT infrastructure and any information inputted into the software is stored in the CSP’s data center. In the event a disaster strikes business’ premises, companies can continue to access to their data and get back up and running easily from another location.

The GeoShepard core team has over 120 years of combined technical and management experience, with expertise in technology, project management, and finance. The team is highly motivated and comprised of seasoned executives who have raised $60 million of capital, sold eight companies, and taken two companies public. In the cannabis industry specifically, GeoShepard has engaged advisors that are expert cultivators and cannabis cup winners as well as professionals in the high tech computer arena that have successfully started and sold tech businesses. The GeoShepard team holds two patents for Bluetooth tracking and weighing and has been certified with Colorado, Oregon, and Alaska Marijuana Enforcement Divisions as a metrc™ integrator. GeoShepard is also a certified Apple™ and Gimbal™ developer.

GeoShepard’s current projects include three corporations with six total facilities. For these clients, GeoTrack™ is actively tracking 50,000 plants worth $32.8 million. GeoShepard is an A&D™ scale distributor with 60 customers processing 1,500 wet weights per week through GeoScale™.
Redwood Partners/NOBO
Redwood Investment Partners was founded in 2013. Together with its management team, NOBO Partners, Redwood is considered one of the top building designers and cultivators in the highly regulated Colorado cannabis industry.

Most recently, Redwood developed a highly efficient 45,000 square foot cultivation facility in Denver. A showpiece facility, Redwood led the project from start to finish, including the acquisition of the property, design, build out, staffing, and state and city licensing approval. This facility boasts the latest advancements in lighting, environmental controls, and top-of-the-line nutrients.

Redwood is on the cutting edge of cannabis cultivation and extraction technology. Some their advancements include:

- A cooling system that uses natural gas rather than costlier and less environmentally friendly electricity;
- A chiller system that reclaims water and CO2;
- A more efficient cultivation facility that generates the highest yields and lowest overall price per pound of any indoor cultivation facility;
- A high tech year-round hybrid greenhouse which uses light supplication and light deprivation to dramatically reduce the carbon footprint as well as the price per pound; and
- Grow techniques that maximize the relationship between grow and extraction by controlling the condition of the plant matter that is being fed to the extraction process.

Redwood/NOBO understands different cannabis strains that create a varied cannabinoid profile with each plant, and their specific medicinal value and has its own proprietary strains. They also work with breeders to create new strains that maximize cannabinoids, specifically CBD, THC, and THC-A in each plant and use tissue culture practices and technology to preserve, retain, and maintain their proprietary medicinal strains. Redwood breeds new strains for future medicinal purposes as the industries continue to learn more about the healing properties of Cannabis. Understanding the genetics and the grow to extraction relationship is their mission.

The team at Redwood/NOBO boasts over a dozen Cannabis Cup awards.

NOBO works extraction partners to provide specific products for their specific needs and has dozens of partnerships with Denver based extraction companies. The NOBO team includes bio-pharma engineers and scientists who create more effective medicines. Redwood/NOBO is passionate about the healing properties of cannabis.

Drawing from their experience of pioneering the Colorado market, Redwood/Nobo will help PennStar bring the safest, most effective medicinal cannabis products to the state of Pennsylvania. Starting with designing the most efficient cultivation facility to date and ending with incorporating state of the art grow and extraction techniques, Redwood/NOBO and
PennStar will produce the highest level of medicinal cannabis products formulated.

Isolate Extraction Systems Inc. (IES)
Founded in 2012, Isolate Extraction Systems Inc. (IES) manufactures safe, high quality, food grade extraction tools backed by expert service and client satisfaction, raising the bar in manufacturing and service. IES has over four years of experience working with local municipalities—including fire, health, and building departments—to ensure system approval and compliance on behalf of their clients. IES already offers over twenty different certified designs with systems in Colorado, Washington, Oregon, Nevada, Illinois, California, Puerto Rico, and Canada.

The company continues to develop state of the art technology and procedures, with the goal of producing the most advanced equipment in regards to safety, efficacy, reliability, and ease of use. All of the equipment produced by IES is 100% automated, using primary in-house designed software. This software ensures consistent and repeatable production schedules while eliminating the need for constant monitoring, lowering overall labor costs. The equipment is even certified in several municipalities for autonomous use, allowing for unattended night production.

IES is committed to certifying their clients are fully compliant with each state’s rules and regulations, providing at least sixteen hours of on-site training with the purchase of every system. Training covers everything from ensuring operators have a basic understanding of CO2 as a solvent, and goes on to cover safety, automation/system operation, cleaning, maintenance, and troubleshooting. Each client also receives hands-on training through a live run application, which includes material prep, loading, setting parameters, harvesting, and cleaning the system.

CanCore Concepts, Inc. & Denver Packaging
CanCore Concepts (CCC) is an industry leader in providing consultation services to organizations and individuals looking to obtain state licensing in the medicinal and retail cannabis space. The company was established with the goal of building upon its founders’ experience operating in the licensed Colorado Medical Marijuana market, utilizing proven standard operating procedures (SOPs) and intellectual properties (IP). Since September 2013, CCC has developed core brands in conjunction with Denver Packaging Company (DPAC), a Colorado-based, state-licensed cannabis manufacturer. Building upon previous success with DPAC, CCC began providing professional consulting services in the Cannabis space across the country and internationally. The CCC executive team brings 20+ years of combined experience operating licensed entities to PennStar Medical.

CanCore Concepts is currently actively consulting on the production of medical marijuana in Colorado, California, and Arizona and is building out operations in Puerto Rico, Florida, and Jamaica. The company’s trajectory has it developing active licensee partners in Nevada, Washington, and Oregon. Internationally, the company has worked with and maintains relationships with licensed operations in: Canada, Germany, Spain, Columbia, and Australia. In addition, CCC has consulted with licensed organizations in: New York, Illinois, Maryland,
Puerto Rico, Hawaii, Jamaica, and California. CCC’s successes in these regulatory environments have led to long term licensee and consulting relationships—making many of the company’s consultees the industry leaders in their respective space.

CCC and DPAC will support the development and implementation of state-compliant processing, packaging, and labeling for PennStar’s processing operation. With a focused approach of standardizing PennStar’s operations, the company will aid in implementing the PennStar’s medical marijuana processing model. The PennStar executive team will work closely with CCC’s senior consultant in an all-hands effort to optimize production and efficiency. The SOPs CCC intends to implement with PennStar include, but are not limited to: employee training, building and facilities, equipment use and maintenance, material management, quality control, packaging and labeling, storage and distribution, compliance, trim acquisition, and processing.

In addition to developing licensing, consulting, packaging, IP, and standard operating procedures, the company will help PennStar in their mission to educate the public by creating training and awareness programs on topics related to the cannabis industry. CCC is a founding member of the American Trade Association of Cannabis and Hemp (ATACH), which promotes compliant expansion, protection, and preservation of incorporated businesses and stakeholders engaged in the legal trade of industrial, medical, and recreational cannabis- and hemp-based products.

CCC takes a very deliberate and thorough approach with every consultee it engages with. PennStar will be guided by CCC and its principals through every stage of development—from initial licensing, ongoing compliance, facility layout, buildout, equipment selection, batch production hiring, product certification, standardized in-house testing, third-party-licensed testing, marketing, distribution, trim acquisition, medical marijuana extraction, and product development. The company will be an ongoing operation partner with PennStar, ensuring that every medical marijuana product produced is of the highest quality and efficacy.

ICIP
ICIP LLC was established in 2011 as a security and risk management consulting firm. The firm specializes in protecting mission critical facilities and critical infrastructure worldwide. ICIP provides a holistic approach to security, bringing together security systems, policies and procedures, and training together into a seamless security program. ICIP’s security and risk solutions support and enhance the missions of the organizations with which they partner, approaching security programs from the perspective that they should be designed to work with the operations of an organization as to not interfere with daily activities.

ICIP is made up of principals and associates that have a broad breadth of experience in security and risk management. ICIP brings the following past performance and expertise to the organization:

- Chief Security Officer (CSO) services for marijuana company located in Colorado, including development and oversight of a security program that covers four grow sites, 13 dispensaries, and one processing facility. In addition, ICIP oversaw the security for
the company’s transportation and logistics program, conducted site audits, and developed a master plan broken down into phased implementations. ICIP held active shooter and armed robbery training and drills with the staff.

- Member of multiple medical marijuana application teams that were successful in winning licenses, providing the security, system design, transportation, and diversion sections of the applications.
- Managed the Transportation Safety Administration’s 100% Baggage Screening program after 9/11/2001, overseeing the installation of explosive detection systems throughout airports located in the Pacific Rim.
- Program oversight for installation of systems for the USPS Ventilation Filtration System program which was designed to eradicate bio hazards that were being shipped through the US mail.
- Secured nuclear power plants through the installation of integrated security systems. These systems included CCTV, Infrared pulse detection sensors and a command/control platform.
- Part of a team that designed, installed, and provided training of leap ahead technology (International Base Defense Security System [IBDSS] program) for US Air Force Bases located around the world.
- Designed build of integrated security system for protection of a refined products pipeline originating in El Paso, TX and running to Phoenix, AZ and then north to Las Vegas, NV. The security system included: underground sensitive fiber optic detection, CCTV, access control, sensitive fiber optic fence detection, redundant command centers, and redundant power.
- Conducted a needs assessment for an integrated security system to protect a remotely located installation on an international JTF military base. The system included wireless CCTV, sensitive fiber optic fence detection, and wireless communications.
- Provided integrated solutions, via command and control software platform, for cities in Safe City projects in Latin America that include CCTV, GPS tracking, communications, reporting and investigations.
- Provided security solutions and recommendations to VP of Security of a mega-resort in the Bahamas during the construction phase.
- Provided Chief Security Officer (CSO) of a regional healthcare provider in the Rocky Mountain region services for a four-state region leading the security program and Director of Security. Conducted threat and vulnerability assessments, site audits, active shooter training/drills, de-escalation training, and developed a phased implementation plan for security upgrades.
- Performed operational, personnel, and facility security risk assessments and management for local and federal law enforcement agencies.
- Provided security training and exercises for U.S. military.
- Provided operational risk and security planning and agency command at the Salt Lake City Winter Olympic Games.

ICIP, its principals, and associates provides best of class security and risk management consulting services with a vast array of past performance and experience. The firm has played an integral part in developing the safety policies and procedures of the PennStar Medical team
and post-licensing will ensure that all facilities, product, staff, and patients are safe while managing risk components for the organization. They are an essential part of the team and will work closely with management, operations, and sales divisions to accomplish this goal. Additionally, ICIP will oversee the hiring and training of local individuals and companies as part of the security team.

LandRace
LandRace Group is a team of forward-thinking green industry experts and business consultants who provide superior seed-to-sale consulting services. They will combine their proven medical and recreational industry expertise with superior consulting solutions to help PennStar Medical establish their dispensary operation. LandRace has served previous clients by leveraging their knowledge of industry best practices and experience to develop dynamic strategies and roadmaps to successfully build companies in new markets, and will do the same in Pennsylvania for PennStar.

LandRace Group Founder and Chief Executive Officer, Rhett Jordan, maintains over a decade of operational and management expertise in the medical and recreational green space. The founder of Native Roots, Mr. Jordan has dedicated his career to developing and executing the vision for one of the largest and most successful dispensaries in the world. Over the past eight years, Rhett has proven his expertise in production and extraction techniques, while holding over 150 licenses in the State of Colorado. To date, Mr. Jordan has built an empire of 19 medical and recreational retail locations with an anticipated four set to open before the end of 2017. Native Roots maintains a current total of 250,000 square feet of state of the art grow operations, making them one of the world’s largest marijuana growers.

In addition to his business successes, Mr. Jordan has worked hand-in-hand with lawmakers to facilitate a successful and effective statewide regulation and development. With a dedication to 100% state regulatory compliance, Mr. Jordan has worked to create public awareness, engage communities, and educate the general population about the benefits of responsible recreational and medical marijuana use.

Rhett Jordan is a celebrated icon in the cannabis industry who not only brings consummate experience to PennStar but also extraordinary credibility.

Alex Romero, LandRace’s COO, brings over ten years of consulting experience with Fortune 500 companies to the table. He has consulted on a variety of areas, including project management, change management, organizational design, stakeholder engagement, staffing, training, and adoption, and strategic communications. With a focus on helping clients fulfill their visions and exceed their goals, Mr. Romero has developed solutions for diverse organizations, ranging from small businesses to companies like Wells Fargo, Agrium, Duke Energy International, Xcel Energy, Chipotle, and Westat.

LandRace has designed solutions in the cannabis industry for everything from grow and production to marketing and events and brings that invaluable, wide-ranging expertise to the PennStar team. In addition to its work in the other aspects of company operations LandRace
and Rhett Jordan will set up and launch our dispensary division from top to bottom—an area in which Rhett Jordan is recognized as one of the best.

**Timeless Herbal Care**

Timeless Herbal Care (THC) is an international nutraceutical pharmaceutical company based in Kingston, Jamaica. THC was the first company in Jamaica to be issued a research and development license by the Jamaican government, and is now a commercial partner with the University of The West Indies, allowing them to be very involved in the research and development process.

In 2015, THC signed a $100 million deal with Colorado company OpenVAPE, the largest consumer cannabis brand, to develop medical marijuana products in Jamaica for the international market. The deal marked the first time in history that an international collaboration had been established to produce cannabis-infused products outside of the United States.

The THC team has a wide range of experience, ranging from growing to extraction and production, led by CEO Courtney Betty. Mr. Betty has over 20 years of legal experience, having served as a Crown Attorney for the Department of Justice Canada. In this role, Mr. Betty represented the Canadian government in complex tax, commercial, and litigation matters. He later served as Senior Legal Counsel for the Jamaica Fair Trade Commission, helping the Jamaican government successfully deregulate Jamaica’s telecommunications industry.

Mr. Betty is a member of the Law Society of Upper Canada and Bar of Jamaica. He has been honored with the City of Toronto William Hubbard Award for helping to build a strategy for minority businesses in Toronto. He was also awarded Planet Africa Leadership Award for his role in community building and the Province of Ontario has presented him with The Queen Elizabeth Jubilee Award.

Timeless Herbal Care will provide the expertise, experience, and established reputation necessary to ensure that PennStar Medical is only introducing the safest, best possible products into Pennsylvania’s medical marijuana market.

### SECTION 20 – CURRENT OFFICERS

**Provide the position, title in the applicant’s business, and address information for all current officers, directors, partners or trustees.**
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

Phone:   Fax:   Email:   

IF MORE SPACE IS REQUIRED, PLEASE SUBMIT ADDITIONAL INFORMATION ON OTHER OFFICERS IN A SEPARATE DOCUMENT TITLED “CURRENT OFFICERS (CONTD.)” IN ACCORDANCE WITH THE ATTACHMENT FILE NAME FORMAT REQUIREMENTS AND INCLUDE IT WITH THE ATTACHMENTS.

SECTION 21 – OWNERSHIP

IN THIS SECTION, LIST ALL PERSONS WITH A CONTROLLING INTEREST IN THE BUSINESS, DEFINED AS FOLLOWS:

1. FOR A PUBLICLY TRADED COMPANY, VOTING RIGHTS THAT ENTITLE A PERSON TO ELECT OR APPOINT ONE OR MORE OF THE MEMBERS OF THE BOARD OF DIRECTORS OR OTHER GOVERNING BOARD, OR THE OWNERSHIP OR BENEFICIAL HOLDING OF 5% OR MORE OF THE SECURITIES OF THE PUBLICLY TRADED COMPANY.

2. FOR A PRIVATELY HELD ENTITY, THE OWNERSHIP OF ANY SECURITY IN THE ENTITY.

COMPLETE THE APPROPRIATE SECTION(S) BELOW:

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Medical Marijuana Dispensary Permit Application

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### B. FOR PARTNERSHIPS AND LLPs
# Medical Marijuana Dispensary Permit Application

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Medical Marijuana Dispensary Permit Application

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**C. Other persons holding an interest in the proposed site or facility**
LIST ANY OTHER PERSONS HOLDING AN INTEREST IN THE PROPOSED SITE OR FACILITY, THAT ARE OTHERWISE NOT DISCLOSED IN SECTIONS A OR B.

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Nature, type, terms and conditions of the interest in the applicant:

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IF MORE SPACE IS REQUIRED, PLEASE SUBMIT ADDITIONAL INFORMATION ON OTHER PERSONS HOLDING AN INTEREST IN THE PROPOSED SITE OR FACILITY IN A SEPARATE DOCUMENT TITLED “OTHER PERSONS HOLDING AN INTEREST IN THE PROPOSED..."
SITE OR FACILITY (CONT'D) IN ACCORDANCE WITH THE ATTACHMENT FILE NAME FORMAT REQUIREMENTS AND INCLUDE IT WITH THE ATTACHMENTS.

SECTION 22 – CAPITAL REQUIREMENTS

DOH REDACTED
## SECTION 23 – COMMUNITY IMPACT

Please be advised, indication of support from public officials will not be considered when evaluating this section.

Provide a summary of how the applicant intends to have a positive impact on the community where its operations are proposed to be located:

PennStar Medical, LLC will have a positive impact on the community where dispensary operations are proposed to be located in Philadelphia. The executives and employees of PennStar have extensive histories in personal community involvement, as well as developing corporate involvement in communities, local organizations, and charities. The combined experience of the leadership team at PennStar is rooted in the Philadelphia community and throughout the Delaware Valley.

The founder of PennStar, Darryl Hill, is known as the “Jackie Robinson of College Football,” having broken down community barriers as the first black college football player integrated into the Atlantic Coast Conference (ACC) in 1963. Mr. Hill overcame violent animosity for his position as the only black man among thousands of whites in college stadiums across the Atlantic Coast and the South, which, at the time, barred African Americans from merely attending football games. In much the same way, Mr. Hill is inspired to transform the 99% white-owned medical marijuana industrial landscape, and, to the best of his ability and the combined strength of the executive team at PennStar, bring the opportunity of advanced-position employment to the disenfranchised black community Southeastern Pennsylvania.

As a minority-owned company, PennStar has a working familiarity with the poverty that besets the region surrounding their plant. A minority-owned firm does not need a management sensitivity training program or a concerted outreach program—they are the management. They will naturally hire from their community and there will be no glass ceiling to management. Most importantly, they will control and benefit from the wealth generated by the firm which will in turn benefit the community in which they operate.

Qualified medical marijuana patients and caregivers, as well as the general public, deserve transparent businesses in their community and PennStar will commit to ethical, community-
driven business decisions. PennStar owners, investors, and employees seek to be treated as members of the community as well, and be respected as a revenue-generating business that benefits the community as a whole. Part of that relationship will be upheld by medical marijuana misuse prevention programs initiated by PennStar, and the other part by relationships fostered within the community that embrace the PennStar brand and the company’s community-driven values. Having deep ties to the communities in the Philadelphia region and Southeastern Pennsylvania more broadly, PennStar will hire within the community as well as diverse individuals from surrounding communities that best represent the values of the company.

Locating in Philadelphia
Philadelphia has the highest rate of deep poverty—people with incomes below half of the poverty line—of any of the nation’s ten most populous cities. The annual salary for a single person at half the poverty line is around $5,700; for a family of four, it’s around $11,700. Philadelphia’s deep-poverty rate is 12.9 percent, or around 200,000 people. The Philadelphia deep-poverty figure wasn’t a complete surprise for antipoverty advocates, since the city already has the highest poverty rate—28.4 percent—of any of America’s largest cities.

Mr. Hill has a long professional history of community economic development. As the director of the Anacostia Economic Development Corporation (AEDC), a community-based organization, he focused on generating economic development in the Anacostia section of Washington, DC. Anacostia is very similar economically to many parts of Philadelphia. While at AEDC, Mr. Hill made a difference in that economically distressed community, and he will draw on those lessons to help the community surrounding the dispensary turn the economic corner.

Community Mission
PennStar promises to uphold the integrity of the Medical Marijuana Act and its commitment to enrich communities around the Commonwealth of Pennsylvania with employment opportunities, tax revenue, and ancillary economic growth. PennStar will provide the company’s neighbors with compassion in their pursuit of safe access to medical marijuana, and greater education that may erase the stigma associated with the therapeutic use of medical marijuana, as our community was founded on the virtues of compassion for a diverse community. PennStar will be fully engaged in delivering on its commitment to the community by facilitating and constantly participating in programs that positively impact the community. Part of the educational resources that the company will commit to developing will be conducting public meetings at local churches, libraries, and community buildings. The meetings will be tailored to the needs of the community and will leverage the content developed by PennStar executives. PennStar envisions holding the meetings in a space with ample seating to facilitate conversations with community members. PennStar will foster a harmonious and productive community relationship, starting with the company’s own team members and the medical marijuana patients they serve.

Membership in Community Organizations
PennStar will commit significant effort to maintaining good standing relationship with the local community and that promise is evidenced by the community engagement history of Mr. Hill
and the entire team at PennStar. Michael Bronstein, an accomplished government and community affairs expert, will serve as PennStar’s Patient, Community & Outreach Director. He will engage diverse community leadership groups in the area on a micro and macro scale, while also perpetuating the PennStar brand as inclusive, progressive, and diverse. PennStar will pursue a recognizable relationship with veterans’ groups, women’s organizations, organizations catering to those with disabilities, LGBTQ organizations, and others that involve people from many walks of life. Local and regional merchants’ associations, community recreational programs, and neighborhood business associations will be solicited by PennStar through a multi-step Community Outreach Plan, and by independent company efforts to sustain the funding and support for local community organizations.

**Positive Impact Plan**

PennStar will have a positive impact on the community by maintaining a profitable, operational business that employs members of the community. PennStar will operate a fully secure facility, and it will be forbidden for unaccompanied minors to enter the facility. No medical marijuana or medical marijuana product will be visible from the outside of any PennStar facility, and PennStar will completely uphold its commitment to preventing unlawful diversion of property or medical marijuana products. The facilities will maintain several security cameras on the interior and exterior of buildings. Security cameras on the exterior of the buildings will have the operational capacity to monitor nearby parking, car traffic, and pedestrian traffic. In the case of an emergency, crime, or any suspicious activity, video surveillance footage may reveal to local law enforcement critical evidence for prosecution.

PennStar will seek out a Neighborhood Watch Program that coordinates crime prevention efforts among local business leaders and local residents. To further deter crimes against PennStar properties and in the surrounding community, video surveillance advisory stickers, neighborhood watch stickers, and security system signage will be strategically placed at entrances and around the exterior of the building. PennStar will become a good neighbor to the local residents and businesses of Philadelphia.

PennStar’s founding executive team believes deeply in the power of enriching the community through transparent business practices, and will support local institutions in their pursuit of enriching existing community programs. Many of the PennStar team members are involved in extracurricular activities in the very community that the permittee intends to establish operations.

PennStar team members already volunteer for efforts to combat drug abuse and homelessness in their home Townships and throughout the Commonwealth. As good business neighbors, PennStar will advance the enrichment of the community and sustain healthy relationships with regulators, law enforcement and local residents.

**Community Real Estate Investment Trust**

PennStar will set aside a predetermined percentage of profits and reinvest significant funding into the community, including a specified amount for an investment trust, for which PennStar investors will team up with other key funding sources to get the best return possible on
PennStar’s community impact efforts. PennStar intends to build a mixed-use commercial park, developing this institution for several reasons. Namely, Southeastern Pennsylvania, and the Philadelphia region specifically, is lagging behind national and statewide job growth. Thus, it is the intention of PennStar to keep residents working in their own neighborhood. Philadelphia ranks last among the 25 most populated cities in the nation in adult and child poverty, and job growth in the City is down to just 1% per year, slower than in Baltimore, and Detroit—two cities known around the nation for their peculiar economic hardships. Yet, Philadelphia remains neglected from significant efforts to repair the damaged economy, particularly among African American and other minority communities of Southeastern Pennsylvania.

The commercial center that PennStar intends to build through a Real Estate Investment Trust (REIT) will provide retail, research and development, and light industrial space for ancillary businesses associated with the cultivation, manufacturing, and dispensing of legalized medical marijuana. Light industrial space for medical marijuana-ancillary businesses will be combined with residential space and office space, and designed to foster entrepreneurial activity and industry skills training. Pennsylvania joining the other members of the northeastern United States in initiating a regulated medical marijuana industry provides an excellent opportunity for the disenfranchised members of Philadelphia’s workforce to gain significant job growth from its inclusion. Lighting industrialists, liquefied petroleum gas suppliers, nutrient supply companies, HVAC specialists, and other niche manufacturers and retailers will gain a vital foothold in the booming industry as facilitated by the centralized commercial center/industrial park. PennStar is exploring property near the Philadelphia International Airport for this project.

Organizationaly, the REIT will be modeled after mutual funds and will be treated by internal revenue code as a corporation. It will be widely held by shareholders and will primarily own and finance real estate for the purpose of bringing needed jobs and housing to the Philadelphia region. The purpose of the trust will be to stimulate the growth of affordable housing, industrial development, and commercial development in order to elevate the community. Darryl Hill has an extensive business development history and founded the first publicly owned Minority Enterprise Small Business Investment Company in the nation. President Richard Nixon appointed Mr. Hill as co-chairman of the National Minority Purchasing Council during his presidency. With the establishment of PennStar, Mr. Hill brings this history of minority business development and his experience building business in distressed communities to Philadelphia, to the City’s benefit.

PennStar will seed the REIT with initial capital of $500,000. The financial expertise demonstrated by Mr. Hill and other PennStar executives will then guide the launch of the trust to community leaders and business investors with the goal of attracting additional capital. Because the incorporated training academy (detailed later in this section) will not involve the production, manufacturing, handling, dispensing, or consumption of medical marijuana, investment opportunities will remain open to prospective community leaders from the interconnected northeast megalopolis, extending from Boston to Washington, D.C.

While the population of the Boston–Washington Corridor is estimated to be 50 million residents at this time, it’s estimated another 10 million will call the region home by 2025, amounting to
17% of the nation’s entire population. Thus, it is critical that medical marijuana industry leaders like PennStar invoke a culture of focused on preparedness, and begin to develop the skills of currently disenfranchised workers to harness the full potential of the medical marijuana industry as it grows. The multi-use business park will be utilized by businesses that serve the entire northeastern U.S. and provide tax revenue for Philadelphia that would otherwise drain to other municipalities.

Another beneficiary of the REIT will be a medical marijuana industry-wide training academy. The training academy will incorporate a needs-based scholarship program for medical marijuana occupational training. The institution will facilitate training programs catered to positions at PennStar, and the company will hire from the academy’s graduates, selecting the best students. Aside from jobs at PennStar, the academy will train for specific job duties across the medical marijuana industry. The academy will strive to train all people working for other medical marijuana organizations, growing the pool of qualified industry workers and fostering a sense of community across the Commonwealth. PennStar will facilitate training for high paying jobs that are common within the medical marijuana industry—including facilities managers, horticulturists, receptionists, bookkeepers, accountants, human relations directors, inventory managers, extraction technicians, and security directors. Skills and abilities enhanced and taught at the academy will be relatable to all facets of medical marijuana industrial work and transferable to many jobs outside of the industry. A critical component to the educational programs implemented at the academy will be an emphasis on transferrable technical skills. Computer-oriented, digitally controlled equipment is increasingly utilized in the medical marijuana industry and in all manufacturing jobs, and PennStar will take an initiative in catering job skills and job placement training relevant to increasing technological vocabulary and ability.

The development of the industry-specific training academy will have a long-lasting positive impact on the Philadelphia community and beyond. The multi-use business center will also contain a medical marijuana health and education center. The goal of the center will be to train the public on medical marijuana—how to use it, what conditions it can help, handling, safety, etc. A significant component to public education is addressing misuse, including the use of medical marijuana by minors and persons not legally certified for the use of medical marijuana. Child-proofing and conversation-starting skills will be taught in an interactive educational program that encourages parents and guardians of children to speak openly about the dangers of misusing medical marijuana and how to explain the regulations pertaining to the law. School administrators, local law enforcement officers, Department of Health regulators, and other community figureheads will also be encouraged to participate in educational programs so that they can extend information to their associates and pupils.

**Community Participation**

**Local Commitment to Hiring**

PennStar will always strive to hire the best person to fulfil the goals of the company as it relates to care and respect for the community. The executive team of PennStar is mostly composed of business owners, and through experience, the entire team recognizes the potential of developing a local community workforce. The people of Southeastern Pennsylvania have a well-deserved reputation for being blue collar, family-oriented, and hardworking individuals. PennStar will
make every possible attempt to hire local talent and will recruit potential applicants from a variety of community engagement methods, including local print advertising and social media campaigns.

**Education Provision**

PennStar believes that education of the community can help further dispel the myths surrounding safe and quality access to medical marijuana, and will take extraordinary efforts to provide the community with educational resources necessary to form unbiased and informed decisions regarding medical marijuana. PennStar will host monthly events at the proposed location of the dispensary facility designed to educate medical marijuana patients on the responsible consumption, differing applications of, and dose management of medical marijuana. Monthly educational events will also focus on proper storage of medical marijuana products and strategies to keep medical marijuana products out of the reach of children and unqualified individuals. Monthly seminars will be held in a town hall format and community members will be encouraged to voice their opinions and beliefs surrounding medical marijuana in their community.

PennStar will hire a medical education liaison that will fulfill the company’s goal of consulting with local physician offices on the proper application of medical marijuana. PennStar feels that medical marijuana should be implemented into traditional medicinal practice and medical professionals should embrace the therapeutic power of medical marijuana. In pursuit of that belief, PennStar will do its best to educate local physicians on the benefits medical marijuana may offer for the qualifying health conditions set forth by the Medical Marijuana Act, and PennStar will reach out and facilitate a working relationship with medical institutions in the Philadelphia region.

Medical professionals on the PennStar team will work with institutional professionals to best facilitate research relating to medical marijuana’s medical application, and to educate medical students on medical marijuana. Patients receiving treatment of medical marijuana via regulated dispensary activities may be invited to volunteer their voices in support of the use of medical marijuana to treat severe health conditions.

**Medical Marijuana Organizations**

PennStar will be an active participant in Medical Marijuana organizations, such as the National Cannabis Industry Association (NCIA) and the Marijuana Policy Project (MPP). These two organizations work to dispel myths surrounding medical marijuana as both a vital medicine to millions of people nationwide, and medical marijuana organizations as functional and responsible businesses in local communities. NCIA and MPP both have outlined business strategies that PennStar may implement to help maximize the company’s positive community impact. PennStar believes strongly that the racial injustice prevalent in drug crime prevention efforts is in desperate need of changing, and the company will support local organization efforts to reform nonviolent drug crime sentencing. PennStar will work closely with established business leaders in medical marijuana dispensaries from established medical marijuana networks around the country by attending seminars, workshops and medical marijuana industrial technology symposiums.
Sobriety Advocacy Groups
PennStar believes firmly in the values of sobriety and a drug-free life. The executive team at PennStar will create a positive impact on the community by sponsoring drug education programs at local elementary, middle, and high schools, and provide resources for sobriety activist groups such as Mothers Against Drunk Driving (MADD) and Students Against Destructive Decisions (SADD) PennStar will only endorse legal and safe consumption of medical marijuana and actively maximize efforts to preventing unlawful use, especially by minors. Drug safety and avoidance education will be paramount to PennStar’s community outreach campaigns.

Women’s Resource Centers
PennStar will partner with local organizations to promote awareness and maximize fundraising efforts to combat domestic violence and abuse. PennStar will join organizational efforts to end domestic and sexual violence through advocacy, education, and social change.

Community Outreach Agenda
While PennStar has a deep base of expertise and the proven ability to quickly develop quality content on a variety of medical marijuana related topics, the goal of the company is to serve the local community based on their needs and perceptions. As a result, PennStar will follow a multi-step program to initiate and continue community outreach efforts. The program will commence immediately following the issuing of a permit, and will be operational before any cultivation, manufacturing, or sales operations begin.

PennStar will actively seek leadership stakeholders in City Council, church groups, law enforcement agencies, local fire departments, and patient advocacy groups, with a vested interest in a safe and healthy introduction to medical marijuana in the community. PennStar will arrange a public meeting with community leadership stakeholders, and during those meetings, emphasize the Community Promise and ask for community input to be used in the development of PennStar’s local Medical Marijuana Education and Outreach Agenda. The meeting will be in the form of a public forum, and dialog will be established among influential local institutions regarding the safe access of medical marijuana to suffering patients, and the dangers of misuse, miseducation, and abstaining from conversations about illicit drug use in the community. Meetings will also discuss the limitations that County and Township Councils may impose on advertising, logo distribution, merchandising, and other branding efforts by PennStar.

Workshops based on feedback from community leaders and the public will be developed and implemented into the community. Workshops will be carefully evaluated for effectiveness and interest level, and will encourage interactivity to enhance active participation. Educational programs will be developed by community leaders alongside medical marijuana experts, both internally and among trusted medical marijuana experts, and doctors, to erase the stigma of medical marijuana and its viable application to multiple serious health conditions. Possible topics of early community discussions may include identifying medical marijuana abuse, safe medical marijuana storage, how to talk to your children about medical marijuana, and specific medical diagnoses that have been approved for the therapeutic use of medical marijuana.
Every three months, community leadership stakeholders will be invited to complete a report card based on milestones and accomplishments established at the previous community leadership stakeholder meeting. Workshops will be diligently reviewed by those involved and by PennStar Advisory Board Members so that the company may improve community engagement for the next three months.

PennStar will invite patients to join in participation in the community outreach program as volunteers and spokespeople. Patient volunteers will provide a perspective underdeveloped in the community—that of people suffering from debilitating medical conditions receiving therapeutic value from the use of medical marijuana. PennStar will facilitate safe areas and events for voices of patients from within the community to be heard.

**Diverse Patient Communities**

PennStar is prepared to facilitate the dispensing of medical marijuana to diverse groups of patients, including pediatric, geriatric, and severe needs patients, requiring diligent care while visiting PennStar and while applying medical marijuana for their specific health condition.

*Elderly Community*

Community outreach coordination has commenced in Southeast Pennsylvania in an effort to positively impact the elderly community of the region. Pennsylvania has one of the largest aging populations in the country (4th) and by 2030 it is anticipated that persons over the age of 65 will amount to 30% of the population. PennStar is enthusiastic about giving special attention to this community in their pursuit of quality holistic healthcare options, including medical marijuana. The elderly population and geriatric patients are anticipated to be one of the largest demographics of the patient community that PennStar will serve.

*Patient Community*

PennStar will promote the wellness options provided by a spectrum of medical marijuana products specified for use to treat qualifying medical conditions. Dispensary technicians and staff responsible for handling medical marijuana products and exchanging them for payment from qualifying patients and caregivers will be fully committed to customer service and will be trained on the specified application, use, and dosage for each medical marijuana product. Medical marijuana product packaging will be childproof, and PennStar will uphold its commitment to reducing the access of medical marijuana to children. However, childproof packaging may prove inaccessible for those with a dexterity handicap or severe pain in the hands. Thus, PennStar will make every effort to reconcile the safety of three key community groups: children, the elderly, and the disabled. PennStar facilities will be completely American with Disabilities Act (ADA) compliant and PennStar will promote accessibility for disabled patients and their caregivers. PennStar will specialize in care for all types of medical patients, including those individuals seeking end-of-life care. One of the driving goals of PennStar is to promote the normalization of medical marijuana experiences in a pharmacy setting such as the dispensary, in the comfort of patients’ homes where patients may medicate in peace, and the community that will benefit from the secure and safe operation of PennStar.
PennStar will also develop a program committed to the wellness of police and military veterans. PennStar is committed to providing necessary care to military veterans suffering from post-traumatic stress disorder (PTSD), a permitted use of medical marijuana in the Commonwealth. Many states do not permit the use of medical marijuana for PTSD, and because there is minimal data on the PTSD-specific medical marijuana market around the country, PennStar will be diligent in their research and application of medical marijuana for this mental illness.

**Severe Needs Patients**

In addition to providing outreach and education to the community, PennStar will implement a dispensing plan that helps financially or otherwise distressed patients get the medicine they need at little or no cost with priorities specified by company management. PennStar has a special place in its mission to assist patients with extraordinary hardships. PennStar believes that the families of people in pain or suffering from a debilitating health condition qualified for the use of medical marijuana should not have to pay exorbitant costs for the medicine their family member needs. That is why the company will focus on providing low-cost medicine to patients with severe needs. PennStar will also focus on the medical needs of families of children with epilepsy and qualifying health conditions associated with severe autism. PennStar understands the financial demands of caring for a child with a disability, and believes it is the duty of the company to ensure these families are not financially crippled in order to provide quality of life medicine to their loved one. PennStar will commit funds to supplementing the cost of treatment for those patients that can reasonably prove financial hardship.

PennStar’s unique business methodology will create an added benefit to the community as a whole, but will also add an improvement at the family and individual levels. All patient community outreach programs will be rooted in observable improvements in their ability to manage pain or adverse treatment side effects, perhaps enabling them to return to work, spend time with their family, or relieve the effects of chemotherapy. When combined, the relief these patients receive from medical marijuana products purchased at PennStar will lead to a happier, healthier, more active community.

**Conclusion**

PennStar has already begun making inroads in the communities that make up Philadelphia, and has begun forging important relationships with those who represent the residents of this region. Elected representatives have been part of the planning process thus far, and are energized by the prospect of PennStar bringing the opportunity associated with a new industry to Philadelphia. PennStar has been able to generate this energy because they have demonstrated the company’s deep commitment to improving the lives and landscapes of one of the poorest and most underserved communities in City of Philadelphia, and the Commonwealth.
Attachment A: Signature Page

Instructions:
This attachment is the signature page for your application and all other attachments.
- Please review the application
- By checking the appropriate boxes, indicate the sections that are included in your submission
- Print this attachment
- Sign the document (primary contact or registered agent)
- Scan this sheet and save it as a file called "Attachment A," using the appropriate file name format

By checking "Yes," you acknowledge that you have read the Medical Marijuana Organization Permit Application Instructions before completing an application for a medical marijuana organization permit.

<table>
<thead>
<tr>
<th>☒ Yes</th>
<th>☐ No</th>
</tr>
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The applicant hereby submits this application for a Medical Marijuana Organization Permit to the Pennsylvania Department of Health, which consists of the completed application parts and attachments listed below:

FEES:
- ☑ Initial Application Fee
- ☑ Initial Permit Fee

APPLICATION:
- ☐ Completed Application

OTHER ATTACHMENTS:
- ☑ Attachment B: Organizational Documents
- ☑ Attachment C: Property Title, Lease, or Option to Acquire Property Location
- ☑ Attachment D: Site and Facility Plan
- ☑ Attachment E: Personal Identification
- ☑ Attachment F: Affidavit of Business History
- ☑ Attachment G: Affidavit of Criminal Offense
- ☑ Attachment H: Tax Clearance Certificates
- ☐ Attachment I: Affidavit of Capital Sufficiency
- ☑ Attachment J: Sample Medical Marijuana Product Label
- ☑ Attachment K: Release Authorization
- ☑ Attachment L: Applicant Priorities for Multiple Applications

BACKGROUND CHECKS:
- ☑ The applicant has requested background checks, as described in the instructions.
ADDITIONAL ATTACHMENTS:
Please list any other documents you are submitting as part of this application:

<table>
<thead>
<tr>
<th>File Name</th>
<th>Name of Document</th>
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A false statement made in this application is punishable under the applicable provisions of 18 Pa. C.S. Ch. 49 (relating to falsification and intimidation).

________________________
Signature

________________________
Title in Applicant’s Business

________________________
Date

________________________
Printed Name

A false statement made in this application is punishable under the applicable provisions of 18 Pa. C.S. Ch. 49 (relating to falsification and intimidation).

________________________
Signature

________________________
Title in Applicant’s Business

________________________
Date

________________________
Printed Name

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
Attachment F: Affidavit of Business History

Instructions:

- Each principal or operator of the applicant must complete the Affidavit of Business History
- Execute the affidavit and save as a PDF file called “Attachment F,” using the appropriate file name format. A cover sheet is not needed
State of __________________________
County of __________________________

The undersigned hereby certifies the following:

During the period of time from ______ to ______, the following principal(s), operator(s), financial backer(s) and employee(s), have held a position of management or ownership of a controlling interest in any other business in this Commonwealth or any other jurisdiction involving the manufacturing or distribution of medical marijuana or a controlled substance:

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I hereby certify that I am authorized to execute this affidavit on behalf of the applicant and that the information contained herein is true and correct and that there is no misrepresentation, falsification or omissions in this affidavit. I am further aware that any false or misleading statement or omitted information is punishable under the applicable provisions of 18 Pa. C.S. Ch. 49 (relating to falsification and intimidation).
A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
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Instructions:

- Each principal or operator of the applicant must complete the Affidavit of Business History
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The undersigned, [name], hereby certifies the following:

During the 10 years preceding the filing date of the initial permit application, the following principal(s), operator(s), financial backer(s) and employee(s), have held a position of management or ownership of a controlling interest in any other business in this Commonwealth or any other jurisdiction involving the manufacturing or distribution of medical marijuana or a controlled substance:

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A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
History

State of: 
County of: 

The undersigned, hereby certifies the following:

During the 10 years preceding the filing date of the initial permit application, the following principal(s), operator(s), financial backer(s) and employee(s), have held a position of management or ownership of a controlling interest in any other business in this Commonwealth or any other jurisdiction involving the manufacturing or distribution of medical marijuana or a controlled substance:

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**Affidavit of Business History**

**State:**

**Country:**

The undersigned, in the capacity of [Participant's Role], having the knowledge of the matters stated above, certifies the following:

During the ten years preceding the date of this affidavit, the applicant and the following principal(s), operator(s), financial backer(s) and employee(s), have held a position of management or ownership of a controlling interest in any other business in this Commonwealth or any other jurisdiction involving the manufacturing or distribution of medical marijuana or a controlled substance:

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A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
Business History

State of ____________________________ )
County ____________________________ ) ss:

The undersigned ____________________________, hereby certifies the following:

During the timeframe specified on the initial permit application, the following principal(s), operator(s), financial backer(s) and employee(s), have held a position of management or ownership of a controlling interest in any other business in this Commonwealth or any other jurisdiction involving the manufacturing or distribution of medical marijuana or a controlled substance:

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MY COMMISSION EXPIRES:

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
Attachment G: Affidavit of Criminal Offense

Instructions:

- Each principal or operator of the applicant must complete the Affidavit of Criminal Offense
- Execute the affidavit as instructed and save as a PDF file called "Attachment G," using the appropriate file name format. A cover sheet is not needed
Principal(s):

☑ No principal(s) listed in this permit application have been convicted of a criminal offense graded higher than a summary offense.

☐ One or more principals listed in this permit application have been convicted of a criminal offense graded higher than a summary offense.

If one or more principal(s) listed in this permit application has been convicted of a criminal offense graded higher than a summary offense, please provide below the name(s) of the principal(s) and the offense(s) of which one or more principal(s) was convicted.

Name(s): 
Offense(s): 

Operator(s):

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Financial Backer(s):

☑ No financial backer(s) listed in this permit application have been convicted of a criminal offense graded higher than a summary offense.

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Name(s): ______________________________________
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On May 13, 2007 I was arrested and charged with a DWI (Driving While Intoxicated) in Kings County Brooklyn, NY. I plead guilty and was convicted of NY State violation 1192.2 (Misdemeanor DWI) on November 17, 2008. The result of the conviction was:

- A 1-year Conditional Discharge which expired November 16, 2009
- A $500 fine
- $185 crime victim assistance fee
- 6-month drivers license revocation in the state of NY
- State of NY Certificate of Relief from Disabilities

I certify that, to the best of my knowledge and belief, the statements provided here are true and correct.

[Signature]

3/18/2017
Date
State of ____________________________
County of ____________________________

The undersigned hereby certifies the following by checking the appropriate box:

Principal(s):
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Name(s):  

Offense(s):  

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
General Offense

State of ____________________________
County of __________________________

The undersigned certifies the following by checking the boxes below:

Principal(s):

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Affidavit of Criminal Offense

State:  
County:  
The undersigned ( ) ss. hereby certifies the following by 

Principal(s):

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Name(s): ______________________________________

Offense(s): ______________________________________
State of __________,

County of __________.

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☐ One or more operator(s) listed in this permit application have been convicted of a criminal offense graded higher than a summary offense.

If one or more operator(s) listed in this permit application has been convicted of a criminal offense graded higher than a summary offense, please provide below the name(s) of the operator(s) and the offense(s) of which one or more operator(s) was convicted.

Name(s): ________________________________
Offense(s): ____________________________

Financial Backer(s):

☒ No financial backer(s) listed in this permit application have been convicted of a criminal offense graded higher than a summary offense.

☐ One or more financial backer(s) listed in this permit application have been convicted of a criminal offense graded higher than a summary offense.
If one or more financial backer(s) listed in this permit application have been convicted of a criminal offense graded higher than a summary offense, please provide below the name(s) of the financial backer(s) and the offense(s) of which one or more financial backer(s) was convicted.

Name(s): _________________________________
Offense(s): _______________________________

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
I hereby certify that I am authorized to execute this affidavit on behalf of the applicant and that the information contained herein is true and correct and that there is no misrepresentation, falsification or omissions in this affidavit. I am further aware that any false or misleading statement or omitted information is punishable under the applicable provisions of 18 Pa. C.S. Ch. 49 (relating to falsification and intimidation).

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
RELEASE AUTHORIZATION

TO: _______________________

(Don't write above this line — For Department of Health Only)

I hereby authorize and request every person, firm, company, corporation, board, association or institution of any kind, and every Federal, state or local government entity, including but not limited to every court, law enforcement agency, criminal justice agency or probation department, without exception, both foreign and domestic, to whom this Release Authorization is presented having any knowledge, information, documents, forms, photographs, computer files, accounts, ledgers or other items about, relating to or concerning the applicant and to fully discuss with and answer any inquiry made by any duly authorized investigator of the Pennsylvania Department of Health.

1. I hereby authorize and request any and all documents, records or correspondence pertaining to the applicant, including but not limited to past loan information, notes, checking account records, savings deposit records, safe deposit box records, passbook records and general ledger folio sheets.

2. If this Release Authorization is presented to any brokerage firm, bank, savings and loan, or other financial institution or officer of same, I hereby authorize and request any and all documents, records or correspondence pertaining to the applicant, including but not limited to past loan information, notes, checking account records, savings deposit records, safe deposit box records, passbook records and general ledger folio sheets.

3. I hereby authorize any and all documents, records or correspondence pertaining to myself and the applicant, and I hereby authorize any Federal, state or municipal agency or body, law enforcement agency or criminal justice agency or department, tax agency or authority, regulatory agency, authority or body, to make full and complete disclosure of any and all information and documents including, but not limited to, documents and information otherwise privileged or not subject to public disclosure, as well as other information on file or available concerning the applicant.

4. I hereby release, remise, exonerate and forever discharge the Department, its members, agents and employees, the Commonwealth of Pennsylvania and its instrumentalities, and any agents and employees thereof, from any and all liabilities including but not limited to all manner of actions, causes of action, suits,
debts, judgments, executions, claims, and demands whatsoever, known and unknown, in law or equity, which exist now or in the future against those entities and persons other than relating to a willfully unlawful disclosure or publication of material or information acquired during my investigation.

6. I do for the applicant, as well as for myself, my heirs, administrators, successors and assigns, hereby release, remise, exonerate and forever discharge every person, firm, company, corporation, board, association or institution of any kind, and every Federal, state or local government entity, including but not limited to every court, law enforcement agency, criminal justice agency or probation department, without exception, both foreign and domestic, to whom this request is presented, and any agents or employees thereof, from any and all liabilities, including but not limited to all manner of actions, causes of action, suits, debts, judgments, executions, claims and demands whatsoever, known or unknown, in law or equity, which exist now or in the future against those entities and persons to whom this request is presented, and any agents or employees thereof, arising out of or by reason of the furnishing or inspection of documents, records or other information released in compliance with a request made pursuant to, or as a result of, having been presented with, this Release Authorization.

7. The applicant agrees to indemnify and hold harmless the Department, its officials and employees and every person, firm, company, corporation, board, association or institution of any kind, and every Federal, state or local government agency, to whom this request is presented and form and against all claims, damages, losses, and expenses including reasonable attorneys' fees arising out of or by reason of, the acts permitted and provided for in the Release Authorization.

8. I agree that a reproduction of this request by photocopy, facsimile or other similar process shall be for all intents and purposes as valid as the original.