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   ☐ Northcentral   X Northeast
☐ Southwest   ☐ Southcentral   ☐ Southeast

County 1 (Primary Dispensary Location): Northampton
County 2 (if applicable): Lackawanna
County 3 (if applicable): Wayne

Pennsylvania Department of Health
Medical Marijuana Regions

[Map of Pennsylvania regions]
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: |
| BrightCare NEPA LLC |

| Other trade names and DBA (doing business as) names: |
| N/A |

| Business Address: 425 Spruce Street Ste. 200 |
| City: Scranton | State: PA | Zip Code: 18501 |

| Phone: 570-762-9725 | Fax: N/A | Email: brightcarenepa@gmail.com |

☒ Primary Contact, or ☐ Registered Agent for this Application

| Name: Josephine Vitale |

| Address: DOH REDACTED |
| City: DOH REDACTED | State: | Zip Code: DOH REDACTED |
| Phone: DOH REDACTED | Fax: N/A | Email: DOH REDACTED |

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)

<table>
<thead>
<tr>
<th>Facility Name: BrightCare NEPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address: 1160 Main Street</td>
</tr>
<tr>
<td>City: Hellertown</td>
</tr>
<tr>
<td>State: PA</td>
</tr>
<tr>
<td>Zip Code: 18055</td>
</tr>
<tr>
<td>County: Northampton</td>
</tr>
<tr>
<td>Municipality: Hellertown</td>
</tr>
</tbody>
</table>

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

The Hellertown, Northampton County, BrightCare NEPA dispensary is located on a Lehigh and Northampton Transportation Authority (LANT) route and has ample off street parking including several handicapped designated spots. LANTA runs a state funded program called LANtaVan in Hellertown and it provides door-to-door specialized ride share for senior citizens, persons with disabilities and medical assistance patients. Uber, Lyft and taxi services are available in this region. The BrighCare NEPA dispensary location is only a short drive from Easton, Allentown, Bethlehem, Center Valley, Nazareth, Bath, Northampton, Quakertown, Coopersburg and will serve as a convenient regional dispensary for all of Northampton County and the Greater Lehigh Valley. In fact the population density statistical analysis shows, within 10 miles of this location there is a population of 422,860 people, 811,629 within 20 miles and 1,484,450 within 30 miles. Additionally, Hellertown is centrally located between Easton and Bethlehem the two major population centers in the county and both are within a 10 minute drive of the dispensary. The BrightCare NEPA dispensary is adjacent to a CVS pharmacy, an optical center, a Lehigh Valley Health Network Laboratory and Medical Center, three large dental offices, an Alzheimers Care Facility and the property was formerly used as a Quest Diagnostics testing center.

Hellertown amended their zoning ordinance in an effort to attract a dispensary. These officials proactively engaging in an effort to attract a medical marijuana dispensary to the Borough in an effort to support patient access in the region and to benefit from the economic development potential for this new industry. BrightCare NEPA personnel met with Hellertown officials and the officials made strong arguments and influenced BrightCare NEPA’s decision to locate here. The officials clearly did their homework and argued that their close proximity to Interstate 78, being located on a major LANTA bus route, having over 30,000 vehicles a day pass the location, and being the main access point for people utilizing the Lehigh University Sports complexes are major advantages to locating a dispensary in the borough. We at BrightCare NEPA agree with the Hellertown officials. This BrightCare NEPA dispensary is near every major hospital and health system in the region including, the Easton Hospital, the
Lehigh Valley Hospital and Health system, Saint Lukes University Health System, Good Shepard Rehabilitation Hospital, Sacred Heart Hospital, and countless specialty and sub-speciality clinics and the Allentown VA Outpatient Clinic.

In fact this location specifically triangulates multiple sub-speciality clinics aimed at treating many of the serious medical conditions covered under Act 16, including St. Lukes University Health Network Center for Neurosciences, Lehigh Valley Hospital Cancer Treatment Center, Four of the St. Lukes Health Network Interventional Pain Clinics, and a multitude of Community based Specialty Psychiatric clinics with resources available for patients with PTSD as well as Lehigh Valley Health Network’s Children’s Hospital which provides medical resources for pediatric patients with many ailments including Autism, Cancer, movement disorders and intractable epilepsy. BrightCare NEPA is committed to providing its medical marijuana products to every patient that suffers from a serious medical condition regardless if they are poor, elderly, or disabled. The facility offers a private rear garage door for safe and secure product deliveries and is not within 1,000 feet of any schools or daycares. Hellertown also offers BrightCare NEPA the opportunity to keep its rent and overhead expenses extremely low compared to other locations and BrightCare NEPA will pass those savings on to the low income patients it will serve.

Second Dispensary Location

<table>
<thead>
<tr>
<th>Facility Name:</th>
<th>BrightCare NEPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>245 US Route 6</td>
</tr>
<tr>
<td>City:</td>
<td>Scranton</td>
</tr>
<tr>
<td>State: PA</td>
<td></td>
</tr>
<tr>
<td>Zip Code:</td>
<td>18508</td>
</tr>
<tr>
<td>County:</td>
<td>Lackawanna</td>
</tr>
<tr>
<td>Municipality:</td>
<td>Dickson</td>
</tr>
</tbody>
</table>

Please provide a description of the public access to the dispensary location, including any local public transportation that may be available:

The Dickson City, Lackawanna County, BrightCare NEPA dispensary is located on a COLTS mass transit route and is centrally located in Lackawanna County. COLTS also offers specialized door-to-door ride share services to this location for Senior Citizens, persons with disabilities and Medical Assistance patients. In addition, COLTS offers a complementary para-transit service for individuals with serious disabilities. Patients suffering from serious medical conditions from Scranton, Dunmore, Clarks Summit, Forest City, Carbondale, as well as Moosic and Old Forge will have ease of access to this dispensary. The dispensary has its own parking lot providing ample parking including several handicapped designated spots. Dickson City is a superior location compared to other Lackawanna County locations because it is on Route 6, one of the most highly travel routes in the region with over 30,000 vehicles a day, and it is next to the Viewmont Mall and all major national retail brands, including, Rite Aid, CVS, Wal-Mart, Sam’s Club, Home Depot, Lowes, Wegmans, Kmart, Sears and JC Penny. This area of the County is the major shopping district in the greater Scranton area.

Most people in Lackawanna County from Old Forge to Carbondale and Susquehanna and Wayne Counties go to this area for goods and services. Dickson City is within 10 miles of every major hospital and health system including, Geisinger Community Medical Center,
Moses Taylor Memorial Hospital, Regional Hospital of Scranton, the Commonwealth Health Mid Valley Hospital Center, Gino Merli Veterans Health Center, the Clarks Summit State Hospital, and the Geisinger Commonwealth Medical College. Moreover, this facility has a private rear garage door to allow for secure and private product deliveries and is not within 1,000 feet of any schools or daycares. The population density within 10 miles of this Dickson City dispensary is 236,403 and 447,759 within 20 miles and 697,737 within 30 miles.

Dickson City allows integrated access to existing physician referral networks and specialized medical care for both Commonwealth Health System and the Geisinger Health System. These two health care providers deliver the vast majority of care to patient consumers throughout Lackawanna and surrounding counties. Uber, Lyft and taxi services are available in this area. BrightCare NEPA is committed to providing its medical marijuana products to every patient that suffers from a serious medical condition regardless if they are poor, elderly, or disabled.

Dickson City provides BrightCare the opportunity to keep its rent and overhead expenses extremely low compared to the City of Scranton where rents are double and in some places triple. BrightCare negotiated a very favorable lease in Dickson City and will be able to immediately pass those savings onto the significant low income patient population of Lackawanna and surrounding counties where many patients live at or near the poverty line.

### Third Dispensary Location

**Facility Name:** BrightCare NEPA

**Address:** 588 Easton Turnpike

<table>
<thead>
<tr>
<th>City</th>
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<tbody>
<tr>
<td>Hamlin</td>
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<td>18436</td>
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<table>
<thead>
<tr>
<th>County</th>
<th>Municipality</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wayne</td>
<td>Salem Township</td>
</tr>
</tbody>
</table>

Please provide a description of the public access to the dispensary location, including any local public transportation that may be available:

The Hamlin, Wayne County, BrightCare NEPA dispensary location is in a rural community with public transportation provided by Wayne County Transportation System which services a daily stop near this BrightCare NEPA dispensary location. Wayne County Transportation System also provides Senior Citizens, persons with disabilities and Medical Assistance patients with door-to-door ride share service making this dispensary location easily accessible for our most vulnerable citizens. Uber, Lyft and taxi services are also available in this area. Patient healthcare consumers in this region are accustomed to traveling for healthcare and medications. BrightCare NEPA is committed to providing its medical marijuana products to every patient that suffers from a serious medical condition regardless if they are elderly, poor, disabled or live in a rural or isolated community. BrightCare NEPA has made the conscience decision to locate a dispensary in Hamlin to address the care desert in this rural Northeastern Pennsylvania community created by the financial, socioeconomic and transportation challenges affecting these patient consumers.

BrightCare NEPA has located its dispensary across the street from a Rite Aid, CVS, Dunkin...
Donuts and the regional Weis Market. Sitting at the intersection of State Route’s 191 and 590 at Hamlin Corners and near Interstate 84 makes this location ideal to cover the entire northern Pocono region. Based on local socioeconomic travel patterns locating near the only shopping district in this rural community is critical to patient access as rural patient consumers and their caregivers often travel to populated commercial and retail areas to access multiple resources at once. Patients from Newfoundland, Skytop, Lake Wallenpaupack, Waymart, Hawley, Lords Valley, Honesdale, Milford, Dingmans Ferry, Tobyhanna, Carbondale, Forest City and Mt. Pocono will have convenient access to this dispensary. This dispensary has ample parking and provides secure rear access where BrightCare NEPA will be able to safely and securely move products into the dispensary and is not within 1,000 feet of any schools or daycares. Hamlin’s close proximity to outdoor activity such as Lake Wallenpaupack, and the many ski and summer resorts in the Poconos makes this an ideal location to serve a rural community as well as significant seasonal population and visitors and tourists that frequent the area.

The seasonal population in this area spikes during summer months as access to the natural resources of the Poconos is most in demand. For example, The Hideout, a gated seasonal community in the region sees an average spike in population of at least 15,000 over the summer months and Lake Wallenpaupack seasonal population increases by over 10,000 over the summer. This single dispensary will be able to serve all of Wayne and Pike Counties as well as eastern Lackawanna County. The permanent population density within 10 miles of the Hamlin dispensary is 43,218 and 305,478 within 20 miles and 599,761 within 30 miles. In addition, this area is one of the few areas in the Commonwealth experiencing steady population growth, so much so that the school districts have been expanding to keep up with growth. BrightCare NEPA’s dispensary will be able to serve patients from Wayne Memorial Hospital and Pocono Medical Center Geisinger Community Medical Center, Moses Taylor Memorial Hospital, and Regional Hospital of Scranton Hamlin also offers BrightCare NEPA the opportunity to keep its rent and overhead expenses extremely low compared to other locations and BrightCare NEPA will pass those savings on to its patients.

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 ACCORED EQUALITY OF OPPORTUNITY. TO THE EXTENT AVAILABLE, INCLUDE THE FOLLOWING:

**BrightCare NEPA’s Diversity Mission Statement**

At BrightCare NEPA, we view the differences among us as a virtue and source of strength and are committed to promoting and ensuring the involvement of diverse participants in ownership, management, employment and contracting opportunities. Our business imperative to dispense high-quality, life-changing medical cannabis to patients is inextricably linked to our moral imperative to support and promote diversity, inclusion, access, and opportunity within our organization, as well as with contractors with whom we do business. By recruiting, retaining, and fostering a diverse staff and by embracing the uniqueness of every individual, we aspire to advance the interests of patients, our organization, and our community.

**BrightCare NEPA’s Definition of Diversity**

To BrightCare NEPA, diversity is a tapestry of physical and non-physical traits, cultures, customs, and life experiences that extend beyond the classes of persons entitled to protection under existing law. Accordingly, BrightCare NEPA is proud to adhere to a broad-based definition of diversity, to include: personal life experiences, geographic background, socioeconomic background, cultural experience, educational background, work background, language abilities, physical abilities or attributes, mindsets, philosophical and spiritual perspective, sexual orientation, age, race, ethnicity, color, national origin, sex, gender identity and/or expression, and service to county.
**BrightCare NEPA’s Diversity Goals**

1) Attract, retain, and foster a talented workforce and a work environment that is inclusive and respectful of one another and the community.

2) Ensure continuous improvement by developing, implementing, and constantly monitoring the progress of our diversity initiatives.

3) Cultivate and sustain a business philosophy that embraces diversity, inclusion, access, and opportunity directly correlated with BrightCare NEPA’s success.

**BrightCare NEPA’s Diversity Status**

For BrightCare NEPA, diversity is more than an ideal, concept, or talking point—it is endemic in the organization itself. BrightCare NEPA is owned and controlled 100% by women and is seeking certification as a woman-owned business enterprise and a LGBTQ-owned business enterprise. Additionally, included in BrightCare NEPA’s rank of five corporate Principals are an African American, an Asian American, and a Muslim. And finally, BrightCare NEPA’s six-person management team boasts four women, and a Hispanic, Asian, and LGBTQ individual. BrightCare NEPA’s Owners, Principals, and Financial Backers hail from diverse geographic regions, have varied educational backgrounds, subscribe to varying religious beliefs and bring diverse perspectives to the management of the organization. Our organization celebrates diversity in every possible way.

The vast diversity among BrightCare NEPA’s owners and highest-ranking officials is powerful proof of the organization’s commitment to inclusion, access, and opportunity. As presently constituted, the diversity status of BrightCare NEPA’s Corporate Owners, Principals, Managers, and Financial Backers is as follows:

<table>
<thead>
<tr>
<th>Category</th>
<th>Total</th>
<th>M</th>
<th>F</th>
<th>White</th>
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<th>Hispanic</th>
<th>Asian</th>
<th>LGBTQ</th>
<th>Religious Minority</th>
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</thead>
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<tr>
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**BrightCare NEPA’s Equal Employment Opportunity and Affirmative Action Policies**

Equal Employment Opportunity Policy
BrightCare NEPA recognizes the vital importance of all employees in the successful operation of its organization, and is committed to providing equal employment and advancement opportunities to all individuals based on qualifications, ability and merit. Equal employment opportunity is a fundamental tenet of BrightCare NEPA.

BrightCare NEPA is an equal opportunity employer. As such, it is BrightCare NEPA’s policy that all phases of the employment relationship, including recruitment, hiring, promotion, compensation, discipline and termination, are strictly based on the qualifications of the individual as related to the work requirements of the position. This criterion is applied without regard to sex, sexual orientation, gender identity, race, color, religion, national origin, ancestry, age, physical handicap, disability, marital status, veteran status or any other non-job-related factors. Respect for the dignity and worth of each individual is a basic tenet of BrightCare NEPA. BrightCare NEPA is committed to providing a work environment that is free of discrimination and harassment. The Diversity and Inclusion Officer will have responsibility and authority to administer BrightCare NEPA’s equal employment opportunity policy. He/she will be responsible for reviewing BrightCare NEPA’s operations on a continuing basis to ensure that the full spirit and intent of the equal employment opportunity policy is being adhered to, implemented and realized in every respect. Each manager will also be held accountable for implementing this policy and for compliance with all applicable fair employment laws in his/her area of responsibility.

Any employee who is found to have engaged in discriminatory or harassing behavior in the workplace, or to have otherwise violated the terms of BrightCare NEPA’s equal employment opportunity policy, will be subject to disciplinary action, up to and including dismissal.

Anti-Discrimination and Harassment Prohibition Policy

In furtherance of its commitment to ensure equal employment opportunities to all individuals, BrightCare NEPA does not discriminate against employees or job applicants on the basis of race, religion, color, sex, sexual orientation, age, national origin, ancestry or on any other basis prohibited by law. Consistent with its broad-based definition of diversity, BrightCare NEPA also commits to not discriminate against employees or job applicants on the basis of personal life experiences, geographic background, socioeconomic background, cultural knowledge, educational background, work background, language abilities, physical abilities or attributes, philosophical and spiritual perspective, gender identity and/or expression, and veteran’s or marital status. This nondiscrimination policy applies to all terms and conditions of employment, which include, but are not limited to: compensation, hours, recruitment, selection, training, assignment, evaluation, promotion, discipline and termination. Harassment or discrimination based on any of these characteristics is prohibited by this policy and will not be tolerated at any BrightCare NEPA facility. Prompt and effective corrective action will be taken if violations of this policy are discovered.

Any individual who feels that he or she has been a victim of harassment in any form, including sexual harassment, by any manager, supervisor, co-worker, member, or any other person in connection with his or her employment, will be encouraged and directed to bring the problem immediately to the attention of his or her supervisor, to a manager in their chain of command, or
to the office of human resources. In addition, BrightCare NEPA will continuously monitor the work environment for the presence of any forms of harassment or coercion. BrightCare NEPA will conduct a thorough and impartial investigation of all allegations or suspicions of harassment or discrimination in a prompt and confidential manner. BrightCare NEPA will take prompt, corrective, and appropriate action to address and resolve the problem. Any employee who is found, as a result of such an investigation, to have engaged in harassment or discrimination in violation of BrightCare NEPA’s anti-discrimination and anti-harassment policy will be subject to appropriate disciplinary action, up to and including termination of employment. BrightCare NEPA will also take prompt, corrective remedial action to protect employees from harassment and discrimination by any person with whom employees come into contact through their work, including vendors and contractors.

Employees who report incidents of harassment, discrimination, or provide information regarding such claims, will be protected from retaliation. Retaliation in any form against an employee or applicant who exercises his or her right to make a complaint under this policy or who cooperates in the investigation of any such complaint is strictly prohibited and will itself be the cause for appropriate disciplinary action.

Affirmative Action Program (AAP) – Women and Minorities

BrightCare NEPA has developed and will implement programs to ensure that no barriers to employment exist for women and minorities, and that female and minority applicants and employees enjoy equal employment opportunities within our organization. Those programs include, but are not limited to, the following:

- Advertising open positions in minority news media and women’s interest media.
- Including affirmative action/equal employment opportunity commitment in all advertisements.
- Publishing information on open positions to organizations representing women and minorities.
- Recruiting at educational institutions with predominately minority or female students.
- Requesting that employment agencies refer female and minority candidates.
- Encouraging existing employees to refer qualified applicants.
- Ensuring the selection process is focused on job-related qualifications.
- Training management personnel on proper interview and selection procedures.
- Training all employees on BrightCare NEPA’s fair employment policies.
- Conducting periodic reviews of job descriptions and hiring procedures to ensure they accurately reflect and embody BrightCare NEPA’s EEO and AA policies.

BrightCare NEPA is also committed to ensuring that all employees receive equal opportunity for
advancement and promotion within the organization and will post open positions internally and encourage existing employees to apply for those positions.

Affirmative Action Program (AAP) – Individuals with Disabilities & Protected Veterans

It is also the policy and commitment of BrightCare NEPA to provide equal employment opportunities to qualified individuals with disabilities and covered veterans. BrightCare NEPA will make reasonable accommodations to the known physical or mental limitations of qualified individuals with disabilities, unless doing so would pose an undue hardship with respect to the operations of the business. BrightCare NEPA will engage in the interactive process to identify the appropriate accommodations. All requests for reasonable accommodations and all information disclosed in connection therewith will be treated in a confidential manner and will be maintained in a separate medical file. Similar to its AAP with respect to female and minority candidates, BrightCare NEPA will engage in recruitment efforts to specifically attract individuals with disabilities. In addition to implementing the specific programs referenced above, BrightCare NEPA will inform all recruiting sources of the organization’s policy concerning the employment of qualified individuals with disabilities, and will request that all recruiting sources actively recruit and refer such individuals for job opportunities. In addition, BrightCare NEPA will continue to review and update job qualification requirements to ensure that all such requirements are consistent with business necessity and employee safety. BrightCare NEPA will also monitor the workplace to ensure that the career development progression of individuals with disabilities is equal to that of other employees.

BrightCare NEPA is equally committed to taking affirmative action to employ, and to advance in employment, our nation’s protected veterans. BrightCare NEPA will utilize the same programs outlined above to specifically attract veterans for employment positions.

Publication of EEO and AA Policy Statements

BrightCare NEPA’s EEO and AAP policies summarized above will be posted on the company’s bulletin boards, printed in our employee handbook and published on the company’s website where it will be viewable by employees, applicants and the general public.

Diversity Outreach

To accomplish its goal of developing a diverse workforce, as well as encouraging employment opportunities for female, minority, disabled, and veteran applicants, BrightCare NEPA will engage in wide-ranging recruitment activities to reach a broad and diverse audience. Recruiting resources will include both traditional and nontraditional methods of seeking employees and methods proven to identify qualified minority, female, disabled and job-seekers. BrightCare NEPA’s recruitment programs will include:

- Participation in recruitment programs specifically designed to reach diverse applicants, including the Professional Diversity Network’s Philadelphia Professional & Technology Diversity Career Fair, RecruitMilitary’s
Philadelphia Veterans Job Fair, and Out & Equal’s Workplace Summit.

- Publishing job opportunities at non-profit and government agencies serving diverse populations, including local nonprofit workforce development agencies, healthcare agencies, and veteran-serving nonprofits.
- Publishing job opportunities to professional associations such as African American, Hispanic, and Asian Chambers of Commerce, the National Black MBA Association, Urban League, National Black Chamber of Commerce, and others.
- Recruiting at colleges and universities that serve large numbers of minorities and first-generation college students, including Cheyney University, Lincoln University, and Lackawanna College.
- Publishing job advertisements in newspapers, magazines and journals with minority readership.
- Publishing job advertisements on websites, webcasts, podcasts and other online channels serving diverse groups.
- Utilizing the recruitment solutions services of the regional Workforce Investment Board.

In addition, BrightCare NEPA will become an employer partner with local agencies responsible for WIOA funded workforce programs, will offer mentoring and networking programs, and will develop robust relationships with professional organizations dedicated to diversity and inclusion, including: the National Diversity Council, the Wilkes-Barre Chapter of the NAACP, the Scranton Chapter of the National Professional Association of Women, the Hispanic Heritage Foundation, the National Society of Black Engineers, the Society of Women Engineers, and DiversityInc.

**Commercial Partnerships with Diverse Groups**

BrightCare NEPA intends to contract with diverse groups whenever possible and practical, including Minority-Owned (“MBE”), Women-Owned (“WBE”), Certified Veteran Owned (“VOBE”), and Service Disabled Veteran (“SDV”) Business Enterprises that have been credentialed by recognized third-party certifiers. BrightCare NEPA will also look for opportunities to engage minorities, women, veterans, and service-disabled veterans for any needed professional services.

BrightCare NEPA will use resources and vendor lists maintained by the Pennsylvania Bureau of Small Business Opportunities (“BSBO”) (formerly the Bureau of Minority and Women Business Opportunities) and any relevant county or municipal business bureau or chamber of commerce that keeps such lists.

BrightCare NEPA will give preference to qualified businesses registered as state-approved vendors, and will require its contractors and vendors to comply with the equal employment opportunity laws and guidelines in their employment practices.
BrightCare NEPA has identified the following state-approved vendors as potential commercial partners:

1) **Century Security Services, Inc. (Vendor No. 130860)**
   - Edwardsville, PA
   - Woman Business Enterprise
   - Security Services Subcontractor

2) **Hunstville Executive Search, Inc. (Vendor No. 356740)**
   - Dallas, PA
   - Service-Disabled Veteran Business
   - Temporary Clerical/Administrative Subcontractor

4) **Tucker Law Group, LLC (Vendor No. 505202)**
   - Philadelphia, PA 19103
   - Minority Business Enterprise
   - Legal Services Subcontractor

3) **Linda M. Melvin D/B/A Melvin Claim Service (Vendor No. 111332)**
   - Clarks Green, PA 18411
   - Woman Business Enterprise
   - Environmental Management Subcontractor

4) **A+Plus Powerwash, Inc. (Vendor No. 200868)**
   - Taylor, PA 18517
   - Woman Business Enterprise
   - General Building and Office Cleaning and Maintenance Services Subcontractor

5) **Classic Spray (Vendor No. 332000)**
   - Scranton, PA 18510
   - Minority Business Enterprise
   - General Construction Services Subcontractor

6) **Eastern Telephone & Telecommunications, Inc. (Vendor No. 119888)**
   - Bethlehem, PA 18017
   - Woman Business Enterprise
   - Telecom Equipment Maintenance Subcontractor

7) **The Business Route, LLC (Vendor No. 509751)**
   - Philadelphia, PA 19107
   - LGBT Business Enterprise
BrightCare NEPA anticipates that its contracts with diverse groups will be equal at least 30% of expected revenues. Moreover, whenever it is seeking services, BrightCare NEPA will always seek out diverse groups as a first option.

Additionally, BrightCare NEPA commits to adhere to standards set forth in the White House SupplierPay initiative. Our commitment to this program, which was launched in 2014 by the Obama Administration and the Small Business Administration, means that we pledge to pay eligible small business and diverse vendors within 15 days of the receipt of their approved invoices, thus helping grow their working capital so they can grow their businesses and employ more workers.

**BrightCare NEPA’s Diverse-Group Professional Development Plan**

At BrightCare NEPA, we believe that meaningful diversity within the organization requires that every employee be afforded opportunity for personal and professional growth. To this end, BrightCare NEPA is committed to providing employees with the resources, training, and support necessary to succeed. Specifically, we will undertake the following initiatives to ensure that our employees receive every opportunity to achieve personal growth, career satisfaction, and professional success:

**Training:** BrightCare NEPA views training and educational programs as a critical component of its diversity program. EEO training, diversity training, and educational programs will be required for all management and staff as part of onboarding, at the time of promotion, and at mandatory annual staff reengagement sessions. Training programs will include in-person and/or web-based modules, such as those developed by industry leaders like Korn Ferry and PRISM International, Inc. BrightCare NEPA will also incorporate educational videos concerning prevention of discrimination in the workplace prepared by the Pennsylvania Human Rights Commission (“PHRC”) to educate employees on their responsibilities and rights, including Introduction to PHRC, Employer Discrimination, Employee, Filing a Complaint, Education, and Disability Discrimination (found on the PHRC website); National Diversity Council webinars; and trainings available through the American Association for Access, Equity and Diversity Professional Development and Training Institute (found on its website).

**Women's Forum:** BrightCare NEPA will sponsor a Women's Forum will encourage female employees to come together and discuss business and professional development opportunities and issues, leadership methods, training opportunities, and mentoring. The forum will sponsor a wide range of programs, including social gatherings, public service projects, and events aimed at
benefiting and advancing the interests of women.

**Professional Development:** BrightCare NEPA’s most important long-term goal is the professional development of its employees. Accordingly, BrightCare NEPA will utilize written development plans to assist employees to identify and surpass their professional development goals. These plans, which research shows are especially beneficial for women and people of color, will address employee competencies and skills needed to maximize advancement opportunities, as well as internal sources of support and assistance.

**Performance Evaluations:** BrightCare NEPA will utilize annual performance reviews to guide employee advancement. Supervisors responsible for employee performance evaluations will be trained in formal, objective evaluation tools to ensure unbiased reviews. Employees will be informed of the key competencies relating to their position and their success in achieving those competencies, as well as eligibility requirements for advancement. Managers and senior leaders will also be held accountable through performance evaluations, which will evaluate and rate, among other things, their contributions to the organization’s diversity efforts.

**Networking Groups:** BrightCare NEPA will provide and foster opportunities for networking up and down the ladder. BrightCare NEPA recognizes that networking provides exposure and relationship-building opportunities that have proven advantageous to career advancement. Beyond career advancement, these networking opportunities will also encourage and promote the vibrant, peer-supportive workplace that BrightCare NEPA values.

**Mentoring Program:** Mentoring relationships will be used to help assimilate new employees into our organizational culture. All new employees will be assigned a mentor to assist in orientation and serve as a sounding board and source of support.

Through these and other initiatives, BrightCare NEPA is committed to providing every employee a full and fair opportunity to succeed and excel, and to become leaders, mentors, and role models for future generations of BrightCare NEPA employees.

**Additional Diversity Initiatives**

**Creation of Executive-Level Role of Diversity and Inclusion Officer**

BrightCare NEPA has retained Daryl Evans to serve as its Diversity and Inclusion Officer. In this capacity, Mr. Evans will be primarily responsible for implementing and monitoring BrightCare NEPA’s EEO and AA programs, ensuring a workplace free from harassment and discrimination, and promoting an institutional culture that values and supports diversity, inclusion, access, and opportunity. Reporting to BrightCare NEPA’s CEO, Mr. Evans will develop policy statements, lead recruitment efforts, develop training and education programs, assist in identifying and solving EEO and/or AA problems, develop and manage an internal audit and reporting system to ensure accountability and success of diversity efforts, report to management concerning EEO and AA progress and potential problems, and serve as a liaison
between BrightCare NEPA and fair employment enforcement agencies. Mr. Evans will be an integral member of the executive leadership team, will be supported by staff in the human resources office, and will manage a discretionary budget.

As crucial as the Diversity and Inclusion Officer will be to the success of BrightCare NEPA, BrightCare NEPA’s leadership team well understands that advancing diversity is not the reasonability of a single individual or office. In light of the fact that diversity, inclusion, access, and opportunity are part of BrightCare NEPA’s ethos, every individual within BrightCare NEPA will be responsible for advancing diversity.

### Establishment of Employee Diversity Committee

Acknowledging that there is sometimes an incongruity between management’s emphasis on diversity and rank, and file’s perception of those efforts, BrightCare NEPA will establish a formal Employee Diversity Committee (“EDC”) comprised of employees appointed by their peers to foster community and inclusiveness. The EDC will meet monthly, will report to the Chief Diversity Officer, will receive administrative support from the office of human resources, and will be responsible for the following functions:

- Make recommendations to promote diversity, inclusion, access, and opportunity.
- Advise the Diversity and Inclusion Officer and Human Resources Director on the implementation of the various aspects of BrightCare NEPA’s diversity plan.
- Solicit the views of the BrightCare NEPA workforce on all aspects of diversity.
- Evaluate specific concerns pertaining to potential bias and/or intolerance in the workplace.
- Identify programs that will promote BrightCare NEPA’s diversity goals.
- Report annually to the Diversity and Inclusion Officer and Human Resources Director on BrightCare NEPA’s progress in achieving a more inclusive, nurturing and diverse work environment.

Members of the EDC may be invited to represent BrightCare NEPA at professional events and external activities, including recruitment efforts and mentoring of persons outside the organization. BrightCare NEPA will provide the EDC with a budget and access to resources such as e-mail networks.

### Extension of Employee Benefits to Same-Sex Partners

Consistent with its commitment to provide equal opportunity to all employees and applicants regardless of personal characteristics and/or preferences, BrightCare NEPA will provide equivalent health, dental, vision and other insurance benefits to opposite-sex spouses and same-sex partners or spouses of employees. Likewise, BrightCare NEPA will make other employee benefits available on an equal basis, including, but not limited to, bereavement leave, employer-
provided supplemental life insurance for a partner, relocation/travel assistance, adoption assistance, and beneficiary, rollover, and hardship options with respect to retirement benefits. Lastly, BrightCare NEPA will offer transgender-inclusive health insurance coverage, thus providing equal health coverage for transgender individuals.

**Absolute Pay Equity**

Equal work requires and deserves equal pay. BrightCare NEPA will achieve and maintain pay equity for similar positions and performance. Women employees will earn one dollar for every dollar similarly situated male employees earn. Likewise, minorities will earn one dollar for every dollar similarly situated non-minorities employees earn.

**Ensuring Equal Access to Restroom and Locker Facilities**

BrightCare NEPA adheres to the spirit of the Obama Administration’s May 13, 2016, guidance letter relating to providing transgender individuals with access to suitable facilities—including bathrooms and locker rooms—that match their chosen gender identity.

**Implementation of Other Diversity Initiatives**

Part and parcel of its institutional commitment to diversity, inclusion, access, and opportunity, BrightCare NEPA pledges to undertake a host of other programs and initiatives to foster community, including: creating a web portal dedicated to providing specific diversity training programs; developing an online method by which BrightCare NEPA personnel may anonymously report an incident or act of intolerance, exclusion, or harassment; making diversity part of annual strategic planning; and establishing of “Principles of Community” which will codify BrightCare NEPA’s commitment to diversity and serve as the guiding principles for all BrightCare NEPA’s operations.

**Workforce Utilization Report**

Once BrightCare NEPA has achieved full operational capacity, its workforce will be the embodiment and culmination of the mission, goals, plans, policies, work-culture ideals, and rigorous oversight set forth in this diversity plan. Indeed, BrightCare NEPA has every intention of becoming the paradigm in Northeastern Pennsylvania—and beyond—for workplace diversity, inclusion, access, and opportunity. BrightCare NEPA will do this by making every effort to achieve a workforce which is 90% diverse within three years of operation.

The following workplace utilization analysis chart offers an approximate view of how BrightCare NEPA hopes to look by 2021.

<table>
<thead>
<tr>
<th>Job Category</th>
<th>Total</th>
<th>M</th>
<th>F</th>
<th>Vets</th>
<th>Service-Disabled Veterans</th>
<th>Black/AA</th>
<th>Hisp./Latino</th>
<th>Asian</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Admin/</td>
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<td>2</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>1</td>
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</table>
Accountability

BrightCare NEPA believes that effective implementation of a diversity program requires a robust internal audit and reporting system. Accordingly, BrightCare NEPA’s audit and reporting system will measure the effectiveness of the EEO and AA programs and track tangible progress on the organization’s diversity, inclusion, access, and opportunity initiatives. Further, accountability will be ensured by coupling performance evaluations and compensation to the successful implementation and advancement of diversity initiatives.

At the outset, BrightCare NEPA will rely on industry standards as a baseline. Immediately after commencing operations, BrightCare NEPA will begin to collect its own diversity statistics on an ongoing basis. BrightCare NEPA’s Diversity and Inclusion Officer will lead the effort not only to record and report on the components of the diversity plan, but also to ensure its successful implementation and execution through the following action items:

- Maintain records documenting recruitment, retention, and promotion rates of diverse candidates and employees.
- Conduct periodic review of employment decisions to ensure compliance with company policies.
- Regular conferences with department heads and managers to identify potential problem areas.
- Create and maintain a library of diversity-oriented outreach efforts and events.
- Participate in managers’ performance reviews to ensure that the variable portion of managers’ compensation (e.g., bonuses) reflects achievement of diversity-related goals.
- Conduct semi-annual surveys to assess employees’ perceptions of equal opportunity for success within the organization, sense of inclusion and belonging and exposure to harassing and/or discriminatory behavior.

Prepare an annual report that documents the demographic makeup of BrightCare NEPA staff, measures tangible progress made toward achieving BrightCare NEPA’s diversity goals, itemizes diversity training sessions and outreach initiatives conducted during the prior year and reports on the status of harassment and/or discrimination claims. The annual report will be presented to BrightCare NEPA’s CEO, COO, and President.

<table>
<thead>
<tr>
<th>Managers</th>
<th>Professionals</th>
<th>Service/Maintenance</th>
<th>Admin. Support</th>
<th>Security</th>
<th>Skilled Labor</th>
</tr>
</thead>
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<td>3  2  1  1</td>
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<td>1  1</td>
<td></td>
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<tr>
<td>Service/Maintenance</td>
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<td>2  1</td>
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<td>Security</td>
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<td>2  4</td>
<td>1  1</td>
<td>1  1</td>
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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

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name: Samantha</td>
</tr>
<tr>
<td>Occupation: Media Specialist, Parkland School District</td>
</tr>
<tr>
<td>Also known as: Sam</td>
</tr>
<tr>
<td>Address Line 1: DOH REDACTED</td>
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<tr>
<td>Address Line 3:</td>
</tr>
<tr>
<td>Phone: DOH REDACTED</td>
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<tr>
<th>Name and Residential Address</th>
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</thead>
<tbody>
<tr>
<td>First Name: Vince</td>
</tr>
<tr>
<td>Occupation: President of Fraternal Order of Police</td>
</tr>
<tr>
<td>Also known as:</td>
</tr>
<tr>
<td>Address Line 1: DOH REDACTED</td>
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<tr>
<td>Address Line 3:</td>
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<tr>
<td>Phone: DOH REDACTED</td>
</tr>
<tr>
<td>First Name</td>
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</tr>
<tr>
<td>Josephine</td>
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</table>

**Occupation:** Medical Device Sales Manager  
**Title in the applicant’s business:** CEO

**Also known as:** Josie

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<th>Phone</th>
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<tbody>
<tr>
<td>Diane</td>
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<td>Molewski</td>
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**Occupation:** Housewife  
**Title in the applicant’s business:** Principal, Financial Backer

**Also known as:**

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<th>Suffix</th>
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</thead>
<tbody>
<tr>
<td>Dona</td>
<td>Elizabeth</td>
<td>Hall</td>
<td></td>
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</table>

**Occupation:** Occupational Therapist  
**Title in the applicant’s business:** Clinical Specialist, Financial Backer

**Also known as:**

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<tbody>
<tr>
<td>Michael</td>
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</table>

**Occupation:** Principal Financial Advisor  
**Title in the applicant’s business:** Financial Backer

**Also known as:**

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### Pennsylvania Department of Health

**Medical Marijuana Dispensary Permit Application**

**Address Line 3:** [REDACTED]  
**City:** [REDACTED]  
**State:** [REDACTED]  
**Zip Code:** [REDACTED]

**Phone:** [REDACTED]  
**Fax:** N/A  
**Email:** [REDACTED]

### Name and Residential Address

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<tr>
<th>First Name</th>
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<th>Occupation</th>
<th>Title in the applicant’s business</th>
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</thead>
<tbody>
<tr>
<td>Giro</td>
<td>Thomas</td>
<td>Hall</td>
<td>COO</td>
<td>CFO/Financial Backer</td>
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</table>

Also known as: Tom

**Date of birth:** [REDACTED]

**Address Line 1:** [REDACTED]  
**Address Line 2:** [REDACTED]

**Address Line 3:** [REDACTED]  
**City:** [REDACTED]  
**State:** [REDACTED]  
**Zip Code:** [REDACTED]

**Phone:** [REDACTED]  
**Fax:** N/A

### IF MORE SPACE IS REQUIRED, PLEASE SUBMIT ADDITIONAL INFORMATION ON OTHER INDIVIDUALS IN A SEPARATE DOCUMENT TITLED "PRINCIPALS, FINANCIAL BACKERS AND OPERATORS (CONT'D.)" 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.**

<table>
<thead>
<tr>
<th>First Name</th>
<th>Middle Name</th>
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<th>Occupation</th>
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<tbody>
<tr>
<td>Frank</td>
<td></td>
<td>Wang</td>
<td>Pharmacist</td>
<td>Dispensary Manager, Head Pharmacist</td>
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</table>

Also known as: [REDACTED]

**Date of birth:** [REDACTED]

**Address Line 1:** [REDACTED]  
**Address Line 2:** [REDACTED]

**Address Line 3:** [REDACTED]  
**City:** [REDACTED]  
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**Fax:** N/A  
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### Name and Residential Address

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Also known as: [REDACTED]

**Date of birth:** [REDACTED]

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**Name and Residential Address**

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**Name and Residential Address**

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<th>Middle Name:</th>
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<th>Suffix:</th>
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<td>Also known as:</td>
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**Name and Residential Address**

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<td>Phone:</td>
<td>Fax:</td>
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</tbody>
</table>

If more space is required, please submit additional information on other individuals in a separate document titled “Employees (Contd.)” 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>
</tr>
</thead>
<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>
<td>☒</td>
<td>☐</td>
</tr>
<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>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>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.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>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.</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

Schedule A: Civil or Administrative History Incident

<table>
<thead>
<tr>
<th>Defendant</th>
<th>Name of Case &amp; Docket #</th>
<th>Nature of Charge or</th>
<th>Date of Charge or</th>
<th>Disposition</th>
<th>Name and Address of the Administrative</th>
</tr>
</thead>
</table>

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

YOU WILL TAKE TO BEGIN THE PROCESS FOR THE HANDLING, STORING, AND TRANSPORTING OF MEDICAL MARIJUANA AND MEDICAL MARIJUANA PRODUCTS.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Estimated Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department awards permit to company</td>
<td>9/1/2017</td>
</tr>
<tr>
<td>Finalize all plans and designs; select contractor</td>
<td>9/20/2017</td>
</tr>
<tr>
<td>Submit building permit application to municipality</td>
<td>9/22/2017</td>
</tr>
<tr>
<td>Begin Demolition activities</td>
<td>10/1/2017</td>
</tr>
<tr>
<td>Begin construction</td>
<td>11/15/2017</td>
</tr>
<tr>
<td>Begin management interviewing process</td>
<td>12/1/2017</td>
</tr>
<tr>
<td>Begin management training process</td>
<td>12/15/2017</td>
</tr>
</tbody>
</table>

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. Sam Edwards, Patient Education Manager: Oversee Dispensary Education Program, including developing seminar, website, educational materials, physician education materials and so on. Host outreach activities directed at patients, caregivers and community related to the medical marijuana program, marijuana plants and products in general, and our dispensary services.

2. Vince Canales, Security Manager: Oversee security team and ensure compliance with Security Plan. When necessary, develop improvements to the Security Plan and oversee related staff training. Also, this position ensures all security equipment is well maintained and properly functioning. This position must take all reasonable measures to ensure the protection of patients, staff, product and the facility itself.

3. Josie Vitale, CEO: Our CEO will be responsible for implementing our company’s vision throughout all of our facilities. They will work directly with the executive and departmental management team to ensure we are exceeding patient and DOH expectations on all fronts. CEO will provide general leadership and ensure efficient operations.

4. Giro Tom Hall, CFO: The CFO will ensure financial discipline of the company and will keep all
necessary financial reports and records.

5. Josh Kahn, COO: Our COO will oversee all dispensing operations to ensure they comply with standard operating procedures. They will also oversee contractual relationships with grower/processors to ensure we can provide affordable, high quality medical products to our patients. The COO will manage all departmental managers and interact with DOH when appropriate.

6. Frank Wang, Dispensary Manager, Head Pharmacist: The Dispensary Manager and Head Pharmacist will oversee the day to day operations of our flagship dispensary and serve as the on-site pharmacist for patients. They will ensure all staff comply with regulations and standard operating procedures. They will provide patient consultation on an as-needed basis and provide general leadership to the dispensary team.

7. Farooq Quershi, Medical Officer: This position will ensure the health and safety of all personnel and will ensure the company operates in accordance with its medical mission. The position will also work with the company’s healthcare and research partners.

8. Rev. Katie Day, Community/Patient Outreach: This position will oversee implementation of our Community Impact Plan as it relates to community and patient outreach efforts. The position ensures we are exceeding patient expectations and are operating as good neighbors.

B. PLEASE DESCRIBE THE EMPLOYEE QUALIFICATIONS OF EACH PRINCIPAL AND EMPLOYEE.

1. Samantha A. Edwards is an entrepreneur and inspirational leader. Spending a majority of her career as an Educator, she has earned multiple awards and has been published for her innovative work in educational design and technology integration. As a visionary leader in her field, her presence is often requested on strategic planning committees, development teams, as well as community outreach programs.

Samantha’s educational background includes: A leadership certification (Principal K-12) from Drexel University, a Masters in Development and Strategies from Wilkes University, a certification in Bullying Prevention, Diversity, and Inclusion from Delaware Valley College, as well as the completion of an additional Masters in Instructional Media from Wilkes University this Spring.

Along with over 15 years of experience in the field of Education, Samantha has acquired work-related experiences in other industries as well. She served as the Director of Business Development for a financial company in the Lehigh Valley, performed as a top-selling Real Estate Agent, and invested time in Los Angeles working in the Entertainment Industry specializing in Public Relations, Production, and Marketing. Her most recent endeavor included an active role as an Executive Producer of Daniel Roebuck’s feature film, Getting Grace, which is a story about a 16-year-old girl who is living her life to the fullest as she embraces her terminal cancer diagnosis. Samantha also volunteers her time to programs that benefit children with disabilities, as well as offering her time and resources to the
As a *Founding Partner* and *Vice President of Education and Innovation*, Samantha will develop and manage new ideas and innovation for *BrightCare NEPA*. She will also lead *BrightCare’s Community and Patient Educational Outreach* teams. These teams will provide knowledge and experiences through educational programs to increase awareness of the palliative benefits and healing properties of medical cannabis. Samantha was born and raised in Wayne County, Pennsylvania, and currently resides in the Lehigh Valley with her wife and two sons. She looks forward to advancing her professional career in an industry where she can continue to make a difference by helping others.

2. **Ismael Vince Canales** was born and raised in Philadelphia and is a security expert. He served 6 years in the United States Air Force (USAF) and was awarded the National Defense Medal for Service during Operation Desert Storm. Upon his separation from the USAF, he became a Prince George’s County Police officer in Maryland and served for over 21 years. Vince also served three terms as President of the Fraternal Order of Police, Prince George's County, Lodge 89 where he helped manage over $600 million in assets for the police pension plan. Vince currently serves as a member of the Bowie City Ethics Commission and as a member of the Maryland Police Training Commission.

Vince attended and completed the prestigious Harvard University, John F. Kennedy School of Government, Executive Education for State and Local Government program. He now serves as the President of the Maryland State Fraternal Order of Police and is the Chief Security Officer for Maryland grower and processor licensee, Holistic Industries LLC.

3. **Josephine S. Vitale** is an Ironman Triathlete having challenged herself to the limits of human physical endurance and thrives in challenging environments in life, in business and in endurance sports. Josie has spent her career in the pharmaceutical and medical device industries, having worked for GlaxoSmithKline after graduating from the University of Pittsburgh. She earned success from the start winning the GSK rookie of the year award in her first year in pharmaceutical sales and she continued her success by consistently performing above sales goals for the Central Pennsylvania region. Josie earned a reputation early in her career at GSK as someone who will outwork the competition to service her customers and GSK recognized her commitment and invited her to join their Leadership Development Program.

Josie would go on to accept an offer from Johnson and Johnson to be an Area Business Specialist in the Janssen organization supporting business development for injectable atypical anti-psychotic medications to treat schizophrenia and bipolar disorders. It was in this role that she began her advocacy work on behalf of her customers and her patients. As the Capital Region Business Manager Josie was responsible for influencing state leaders to gain and maintain favorable formulary position for the company’s medications in a complex care delivery model. During her tenure at Johnson and Johnson she consistently performed significantly above goals winning the company’s highest awards on numerous occasions. Josie was a leader in Johnson and Johnson’s Management Development program and shared her experience in strategic planning, execution, and new product
launches and indications on a national level. She was instrumental in the creation of the company’s national business plan development strategy and was often deployed as a territory management analytics trainer.

Taking on new challenges and succeeding is in Josie’s DNA. She spent six years excelling at Johnson and Johnson but left to take an offer from the world’s largest device manufacturer Medtronic, Plc. As an Executive Territory Manager in the prestigious Neuromodulation division she began marketing implantable neuromodulation therapies for patients suffering with chronic back pain and movement disorders. Josie has extensive experience commercializing medical devices, pharmaceutical agents and biotechnology to support dynamic market growth. Currently serving in Sales Management at Nevro Corporation a Neuromodulation start-up she frequently consults with health systems, revenue cycle and finance managers to understand reimbursement nuances with Medicare Transitional Pass-Thru payments and other complexities of health economics.

The role women play in executive and sales leadership in the biotechnology sector has always been a passion for Josie. Throughout her career she continuously served this passion by participating in Global Women’s leadership and development programs at Medtronic and J&J and mentoring future leaders. She looks forward to bringing her expertise at commercializing pharmaceuticals and biotechnology to the Medical Cannabis industry.

4. **Tom Hall** brings 20 years of executive, operational and financial leadership to BrightCare. He is the Chief Operating Officer of Horizon Facility Services (and its subsidiaries MLS and PMC) a national company in scale and size with more than 3,000 employees operating in 20 states. Tom started Horizon Facility Services with his co-founder less than 7 years ago as only a two-employee company. Today the companies operate in one of the most complex logistical environments all while providing services to some of the largest companies in the world. Prior to founding Horizon Facility Services Tom was the Corporate Controller with two major US Companies and also served as Audit Manager in a large regional public accounting firm. Tom’s experienced is focused in accounting and finance, business services and logistics. The combination of this experience will serve BrightCare well during its startup and execution phases. Tom grew up in Loyalville, Pennsylvania and earned his accounting and marketing degrees from King’s College in Wilkes-Barre, Pennsylvania. Tom began his career in public accounting before moving to the private sector where he continued his career in accounting and finance before moving out on his own with Horizon Facility Services. During his free time Tom enjoys playing tennis with his son and running and hiking.

5. Born in Australia and raised in the US in a rabbinic family, Joshua Kahn made aliyah to Israel in 2004 where he completed his Bachelor’s degree at the Interdisciplinary Center in Herzliya. He served in the Israel Defense Forces as a combat soldier and, on completion of his service, Joshua was named Israel Advocate at the University of Florida Hillel, where he served with distinction for an extraordinary three years. In 2013, Josh joined his parents in opening Takoma Wellness Center, Washington’s DC’s first and largest medical marijuana dispensary. He is responsible for policy-making, inventory purchase and control,
regulatory compliance, management of staff, and general oversight of the entire operation.

6. Frank has been in long term care pharmacy since 1991 after graduating from Rutgers College of Pharmacy. While working for Omnicare, he pursued an MBA from Fairleigh Dickinson University graduating in May 1998. He has managed and grown several long term care pharmacies in New Jersey, Pennsylvania, Connecticut and Maine throughout his career. Currently, he works for Partners Pharmacy where he manages a large NJ State Nursing Home Contract and pharmacies in their Florida and Maryland locations. He holds an active pharmacist license in PA, NJ and CT. He is currently registered to take the MPJE exam in FLA and MD which will allow him to reciprocate and be licensed in those states as well.

Frank values the opportunity to be a part of the BrightCare team. Beyond looking forward to the professional challenge and experience, he also has a daughter with epilepsy and understands the potential and health impact that medical marijuana can have on children in need.

7. Dr. Qureshi earned his undergraduate degree in biological science from Cornell University, his medical degree from Temple University School of Medicine, completed his anesthesiology residency at New York Presbyterian Hospital/Columbia University Medical Center in New York City. During his residency at Columbia, Dr. Qureshi served as chief resident of his anesthesia class during the final year and he went on to complete a pain management fellowship at UCLA Pain Management Center in Santa Monica, California. Dr. Qureshi values sharing his knowledge and experience with aspiring anesthesiologists and serves as an Adjunct Clinical Assistant Professor in the Department of Anesthesiology at Temple University School of Medicine and he is active with the American Board of Anesthesiology, the Spine Intervention Society and the North American Neuromodulation Society. Dr. Qureshi currently serves as the Pain Management Attending physician at St. Luke’s University Health Network in Easton, Pennsylvania.

Dr. Qureshi has extensive experience conducting clinical trials, during his tenure at St. Luke’s University Health Network, Dr. Qureshi has conducted clinical trials of the EVOKE spinal cord stimulator system, OPTIONS Medtronic clinical trial of high density programming options in spinal cord stimulation, SBWSH1032, Saluda Medical clinical trial examining the safety and effectiveness of using spinal cord stimulation incorporating feedback to treat patients with chronic pain of the trunk and limbs in an extended trial. Prior to joining St. Luke’s, Dr. Qureshi conducted clinical research at Columbia University, Drexel University and Cornell University. Dr. Qureshi has completed clinical research and presented on propofol administration rates during ERCP, Breast and Cystoscopy cases; Infusion Pump Alarm Limits Created using Historical Data from an Anesthesia EMR; and Evaluation of the efficacy of functional near-infrared spectroscopy in monitoring anesthetic depth upon administration of fentanyl.
Prior to completing his medical training, Dr. Qureshi worked for Merck & Co. in West Point, Pennsylvania. While at Merck, Dr. Qureshi led the design and development team responsible for documenting quality testing used to release products for the worldwide Merck Manufacturing Division as well as providing on-site assistance, including modification of business processes and development of supporting technology, during implementation of a laboratory information management system at Merck Manufacturing sites in Ireland, France, Puerto Rico, Italy, and North America. Dr. Qureshi developed the technological foundation to generate quality testing reports used to monitor and release pharmaceutical products within the Merck Manufacturing Division. Dr. Qureshi is married with two young children and has summited Mt. Kilimanjaro.

8. Katie (Donna) Day is the Charles A. Schieren Professor of Church and Society at the Lutheran Theological Seminary at Philadelphia where she has served on the faculty since 1985. Prof. Day received her academic training at Gordon-Conwell Theological Seminary (M.Div.), Union Theological Seminary (S.T.M.) and Temple University (Ph.D., Sociology). She has published four books, the most recent being a study of urban religion, *Faith on the Avenue: Religion on a City Street* (Oxford University Press, 2014). She has co-edited two volumes: *Companion to Public Theology* (Brill, 2017) and *Yours the Power: Faith-based Community Organizing in the U.S.* (Brill, 2013). She has also contributed chapters in a number of books and published articles and reviews in journals such as *Cross Currents, Journal for the Scientific Study of Religion,* and the *International Journal for Public Theology,* where she also serves on the editorial board. Day was a founding member of the Global Network for Public Theology. As well as her research on urban religion, Dr. Day has conducted major studies of community organizing, Black church arsons and the volunteer effort to rebuild them, religious responses to HIV/AIDS in South Africa, and religious social service agencies. Dr. Day has been a visiting professor at Princeton Theological Seminary, Chester University (U.K.), Stellenbosch University (South Africa), Lutheran School of Theology in Chicago, and the Urban Ecologies program, based at New York Theological Seminary.

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. Upon hire, Human Resources will enter all new agents into our required training program which must be satisfactorily completed before commencing work at a facility. The company will cover the costs of all required employee training, including all Pennsylvania Department of Health (the Department) required training courses.

2. Training will begin with internal or contracted instructors and trainers covering a wide assortment of subjects, including diversity training, operations, security equipment and
measures, product transportation and receiving, product storage, quarantine, inventory quality assurance measures, label verification, inventory management, recall and return policies, diversion prevention, sanitation and safety measures, recordkeeping, and so on.

3. The training program will consist of a series of classes, videos, workbooks, manuals and one-on-one sessions. Trainees must take and pass subject matter examinations and obtain a certificate of completion.

4. Trainees will be enrolled in a Department-approved training course (either administered by the Department or by an approved third-party provider). This course will meet or exceed the 2-hour training requirement mandated by Pennsylvania law and regulations.

5. Any new hires who are physicians, pharmacists, physician assistants, and/or certified registered nurse practitioners will also be enrolled in a Department-approved 4-hour training course on the latest scientific research on medical marijuana, including the risks and benefits of medical marijuana, and other information deemed necessary by the Department.

6. Once successfully completed, trainees must provide Human Resources with sufficient written proof of the completion of the Department’s required training courses before commencing work at a facility.

7. Human Resources will make follow-up training tools available, including enrollment in our mentorship program whereby an experienced employee will individually mentor a new employee in dispensary daily operations and specific job responsibilities after initial training has been complete. This hands-on mentoring will reinforce much of the information taught and provide a forum for each new hire to ask more detailed questions or seek enhanced assistance in mastering a subject.

8. Human Resources will maintain electronic records of all training courses taken and successfully completed by each employee. HR will track the progress of each employee to ensure they complete all required training before commencing work at a facility. Those employees found to be deficient will be reminded of their obligation to complete training.

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 (Cont’d.)” 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>
</tr>
</thead>
<tbody>
<tr>
<td>A physician or a pharmacist will be present</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>at the primary dispensary location listed in</td>
<td></td>
<td></td>
</tr>
<tr>
<td>this permit application at all times during</td>
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<tr>
<td>the hours the primary dispensary facility is</td>
<td></td>
<td></td>
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<tr>
<td>open to dispense or to offer to dispense</td>
<td></td>
<td></td>
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<tr>
<td>medical marijuana to patients and caregivers.</td>
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<tr>
<td>If the applicant is operating any</td>
<td></td>
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<tr>
<td>dispensaries in addition to the primary</td>
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<td></td>
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<tr>
<td>dispensary location listed under the permit,</td>
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<tr>
<td>and a physician or pharmacist is not present</td>
<td></td>
<td></td>
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<tr>
<td>onsite at</td>
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</tbody>
</table>
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.
### Section 11 – Transportation of Medical Marijuana

<table>
<thead>
<tr>
<th>A. Transportation</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>By checking “Yes,” you affirm that any delivery of medical marijuana to any other medical</td>
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</tbody>
</table>
marijuana organization or approved laboratory within the Commonwealth will adhere to 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.

- Medical marijuana will only be delivered between 7 a.m. and 9 p.m.

- Medical marijuana will not be transported to any location outside of this Commonwealth.

- A global positioning system will be used to ensure safe, efficient delivery of the medical marijuana to a medical marijuana organization.

In addition to having a transport vehicle staffed with a delivery team consisting of at least two individuals, the applicant affirms the following:

- At least one delivery team member will remain with the vehicle at all times that the vehicle contains medical marijuana.

- 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.

- 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.

- Each delivery team member will have a valid driver’s license.

- While on duty, a delivery team member will not wear any clothing or symbols that may indicate ownership or possession of medical marijuana.

- 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
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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.

- 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 part of the facility operation, or whether you will use a third-party contractor. If you choose to use your own transportation operation, please provide the number and type of vehicles that will be used to transport medical marijuana and medical marijuana products, the training that will be provided to employees that will transport medical marijuana and medical marijuana products, and any additional measures you will take to prevent diversion during transport. If you will be using a third-party contractor for transporting medical marijuana and medical marijuana products, please explain the steps you will take to guarantee the third-party contractor will be compliant with the transportation requirements under the Act and regulations:
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DOH REDACTED
Section 12 – Storage of Medical Marijuana

<table>
<thead>
<tr>
<th>A. Storage Requirements</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

By checking “Yes” to any statement, you affirm that the plan of operation will address the below statements:

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.

- 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:
**Section 13 – Labeling of Medical Marijuana Products**

<table>
<thead>
<tr>
<th>A. Labeling Requirements</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>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:</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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</tbody>
</table>

- Any resemblance to the trademarked, characteristic or product-specialized packaging of any commercially available food or beverage product. ☑ ☐
- Any statement, artwork or design that could reasonably lead an individual to believe that the package contains anything other than medical marijuana. ☑ ☐
- 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. ☑ ☐
- Any cartoon, color scheme, image, graphic or feature that might make the package attractive to children. ☑ ☐

**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 PROCESS FOR CREATING AND MONITORING THE LABELING USED FOR MEDICAL MARIJUANA PRODUCTS:**

**DOH REDACTED**
Section 14 – Inventory Management

A. Electronic Tracking System

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).

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
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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.

<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:</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>
<td></td>
</tr>
<tr>
<td>• Medical marijuana received from a grower/processor.</td>
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<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>
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</tr>
<tr>
<td>• 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.</td>
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<td></td>
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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:
Section 15 – Diversion Prevention

A. Please provide a summary of the procedures that you will implement at each proposed facility for the prevention of the unlawful diversion of medical marijuana and medical marijuana products,
ALONG WITH THE PROCESS THAT WILL BE FOLLOWED WHEN EVIDENCE OF THEFT/DIVERSION IS IDENTIFIED:

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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.**

**Sanitation and Safety Plan**

BrightCare NEPA has developed and will implement a set of written sanitation and safety standard operating procedures (SOPs) for contamination prevention, pest protection, handling of medical marijuana, and hand-washing facilities based on our real-world tested SOPs which will be adopted, and modified accordingly, from our medical marijuana dispensary affiliate in Washington DC, Takoma Wellness Center, owned and managed by our COO, Josh Kahn. Takoma Wellness is the premier and longest running medical marijuana dispensary in Washington DC. Josh’s unmatched, hands-on dispensary expertise will further ensure BrightCare NEPA will employ an effective sanitation and safety plan.

**Contamination Prevention and Pest Protection**

In compliance with our SOPs, BrightCare NEPA will maintain our facilities in a sanitary condition in order to limit the potential for contamination or adulteration of the medical marijuana stored in or dispensed at the facility. BrightCare NEPA will ensure:

- Trash will be properly removed at least once daily, and more often as necessary
- Floors, walls, and ceilings will be kept in good repair
  - Staff will inspect the interior of the facility as part of opening procedures and will immediately report to management any issues observed or suspected
  - Upon notification of an issue, management will immediately repair the affected floor, wall, or ceiling
Adequate protection against pests will be provided through the use of integrated pest management (IPM) practices and techniques that identify and manage pest problems, and the regular disposal of trash to prevent infestation
  - Staff will regularly inspect the premises for signs of pest infestation and will immediately report to management any issues observed or suspected
  - When and where necessary, we will install door sweeps, utilize sticky traps, and apply safe pest prevention and management products

Toxic cleaning compounds, sanitizing agents, solvents and pesticide chemicals will be labeled and stored in a manner that prevents contamination of medical marijuana and in a manner that otherwise complies with other applicable laws and regulations

**Equipment Sanitation**

BrightCare NEPA will maintain the sanitation of all tools and equipment that may or has come in contact with medical marijuana to prevent contamination in accordance with approved SOPs. To ensure this, we will require all dispensary agents to be thoroughly trained on the sanitation policies and procedures, which have been adopted, and modified accordingly, from our medical marijuana dispensary affiliate licensed in Washington, DC. Protocol includes daily regular equipment cleaning and sanitation as part of opening and closing procedures with the goal of maintaining a clean, sanitary, and contamination-free dispensary reminiscent of a high-end pharmacy or medical office.

All equipment that may or has come in contact with medical marijuana during operations (e.g., scales, measuring devices, display cases, countertops, tables, re-packaging equipment, handling utensils, etc.) must be cleaned and sanitized at a minimum:

- At the beginning of each business day
- Immediately after coming in to contact with medical marijuana
- At the end of each day

At the beginning and end of each business day, employees will be given a checklist of tools and equipment which need cleaning and/or sanitization. Items include:

- Telephones
- Computers
- Tablets
- Monitors
- Scales/measuring devices
- Barcode scanners
Employees must keep detailed logs of each instance of sanitation and record the appropriate information in our electronic recordkeeping system.

Dispensary agents will be trained to inspect each piece of equipment prior to use, particularly if such use involves contact with medical marijuana. If any equipment is suspected of being contaminated in a manner which cannot be cleaned or sanitized (i.e., it is unsalvageable and may pose a health and safety concern to patients/caregivers and staff), it must be immediately disposed and removed from the dispensary to mitigate the potential spread of contamination. Upon suspicion of such unsalvageable equipment, the dispensary agent must notify the dispensary manager who will oversee the subsequent disposal activities.

According to protocol, the dispensary manager will oversee all equipment contamination prevention procedures and will inspect the work of employees to ensure the goals of the dispensary are met.

**Facility Cleanliness**

Under the supervision of the dispensary manager, staff will be given a checklist of items which need cleaning and/or sanitization on daily, weekly, and monthly basis. As items are cleaned, the employee undertaking the task must initial the checklist next to the item(s) upon completion. Maintaining a clean, sanitary environment akin to a pharmacy or medical office will mitigate the risk of equipment contamination and reduce potential safety and health concerns related to patients, caregivers, and staff.

BrightCare NEPA will maintain the cleanliness of the dispensary building and all fixtures, safes, and vaults used to store or display medical marijuana products. To ensure this, BrightCare NEPA will require all dispensary agents to be thoroughly trained on the dispensary’s facility cleanliness policies and procedures, which have been adopted, and modified accordingly, from our medical marijuana dispensary affiliate licensed in Washington, DC. Protocol includes daily, weekly and monthly mandatory cleaning of the facility and all fixtures, safes and vaults. All areas of the dispensary, including all storage areas, must be maintained in a clean and orderly condition and free from infestation by insects, rodents, birds and pests of any kind.
At the beginning and end of each business day, employees will be given a checklist of areas and items which need cleaning and/or sanitization. Items include:

- Windows
- Door knobs
- Welcome mats
- Countertops
- Chairs
- Vault room
- Quarantine room
- Lavatories
- Employee break room

Standard cleaning supplies will be used, including a light bleach solution or anti-microbial soap when appropriate. As items are cleaned, the employee undertaking the task must initial the checklist next to the item(s) once completed. Employees must keep detailed logs of each instance of maintenance/cleaning and record the appropriate information in our electronic recordkeeping system.

Staff will also clean the reception area, waiting area, service area, and all common areas of the facility which typically endure heavy traffic. Employees will sweep the floors and sidewalk adjacent to the entryway. Rubbish must be discarded regularly (at least once daily, and more often as reasonably necessary to assure a clean, healthy, and professional environment).

At least once a week, employees will be given a checklist of items which need enhanced attention when cleaning and/or sanitizing. Items include:

- Components of the security system (i.e., cameras, alarms, card swipes, etc.)
- Office areas
- Employee break room
- Vault room (including all safes and other equipment used to store medical marijuana)
- Quarantine room
- Surveillance room
- Other areas of the facility which have relatively less traffic.

As items are cleaned, the employee undertaking the task must initial the checklist next to the
item(s) once completed. Employees must keep detailed logs of each instance of maintenance/cleaning and record the appropriate information in our electronic recordkeeping system.

At least once a month, employees will be given a checklist of items which need more intensive attention when cleaning and/or sanitizing. Items include the exterior facade of the building. As items are cleaned, the employee undertaking the task must initial the checklist next to the item(s) once completed.

According to protocol, the dispensary manager will oversee all maintenance, cleaning and sterilization activities and will inspect the work of employees to ensure the goals of the dispensary are met. Moreover, the dispensary manager will review maintenance/cleaning logs for accuracy and retain them for safekeeping.

**Inventory Quality Assurance Inspections**

To ensure medical marijuana arrives to our dispensary free of contamination, receiving agents must strictly adhere to BrightCare NEPA’s receiving policies and procedures, particularly the required redundant inspections of all items shipped (e.g., as items are unpacked during delivery, as items are logged into the electronic inventory and recordkeeping system, as items are entered into the Pennsylvania Department of Health’s (the Department) electronic tracking system, as items are transferred to the vault room and placed into storage within a safe, etc.) and will also review independent laboratory testing results for all products delivered with a particular concern for information regarding contamination and purity.

Medical marijuana will be re-inspected for quality assurance purposes often, including when items are:

- Transferred from the vault room to the dispensing area for stocking the display case prior to opening
- Prepared prior to actual dispensation to patients/caregivers upon the conclusion of a sales transaction
- Transferred from the dispensing area back to the vault room for overnight storage at the close of business
- The subject of a return or complaint

**Product Quarantine**
Upon identifying or receiving any returned, unfit (including but not limited to expired, damaged, deteriorated, mislabeled, or contaminated products), and/or recalled medical marijuana products, the dispensary manager will be notified immediately and the secure transfer of such returned, unfit, and/or recalled products to the quarantine room will commence. Authorized agents tasked with quarantine transfers will:

- Inspect all quarantined products and product packaging to assess:
  - The integrity of the containers
  - The likelihood of the spread of contamination to our facility or other inventory
  - Any other health, sanitation, safety, or security threats posed by such products
- Update our electronic inventory tracking system reflecting the transfer of the products to the quarantine room
- Update the Department’s electronic tracking system, if applicable

Once the above has been confirmed, the authorized agents will immediately transfer all returned, unfit, and/or recalled products to the access-controlled quarantine room and carefully place the affected items in the appropriately designated commercial-grade TL30 safe or secure, lockable air-tight storage bin for safe storage of the quarantined products. These safes and storage bins will be utilized as single-purpose, dedicated units for the secure storage of specific types of quarantined products, and will be labeled accordingly (e.g., there will be a safe/bin specifically dedicated for recalled products, a safe/bin specifically dedicated for expired products, a safe/bin specifically dedicated for contaminated products, and so on). The purpose of this segregation system is to:

- Allow for a proper investigation or examination of the products without risk of confusion, cross-contamination, or other concerns which could affect the integrity of an investigation or examination
- Facilitate the organization of the storage area
- Facilitate the accuracy and integrity of any recall activities and related recordkeeping
- Facilitate the orderly destruction, disposal, and removal of unsalvageable medical marijuana products.

All quarantine product transfer procedures will be handled by a minimum of 2 authorized agents and will be conducted in the presence of security agents and within the view of our recording surveillance system. Agents effectuating the quarantine procedures must wear appropriate protective gear (e.g., pharmaceutical-grade nitrile gloves, eye goggles, smocks/lab coats, etc.). Once a quarantine product transfer has been completed, authorized agents will:

- Exit the quarantine room ensuring the door has been fully closed, secured, and locked
• Update the MJ Freeway system with all actions taken to the products, and
• Immediately notify the dispensary manager and security manager that all quarantined products have been safely transferred to the quarantine room

Once in quarantine, products will be subject to further investigation, examination, and testing by authorized staff. Quarantine products will remain in the quarantine room until such products are either:

• Salvaged (based strictly on the results of any investigation, examination, and/or testing and the nature and reason for the quarantine)
• Returned to the grower/processor who manufactured such products, or
• Destroyed or otherwise disposed of in accordance with 28 PA Code §1151.40 (relating to disposal of medical marijuana).

Note, returned products may never be re-dispensed to another patient or caregiver under any circumstances.

**Staff Hygiene**

All dispensary employees will be required to come to work in a clean and hygienic manner. Staff will be required to frequently wash their hands, particularly after handling medical marijuana, handling equipment coming into contact with medical marijuana, coming into contact with a patient, caregiver, or any other person, and after eating or using the restroom. Employees failing to follow hygienic protocol may be subject to suspension or termination.

The hygiene policy will help ensure a safe, sanitary, sterile, contamination-free dispensary environment.

All uniforms and work attire must be clean and free of dirt, debris, dust, and the like. Notably, BrightCare NEPA intends to issue uniforms to employees which will be professionally cleaned on a regular basis to ensure their cleanliness and professional appearance. Staff found wearing soiled uniforms or work attire will be asked to immediately rectify the issue and may be sent home by management for failure to do so.

**OSHA Compliance**

The health and safety of all employees is of paramount importance to BrightCare NEPA. Therefore, we require absolute compliance with all applicable Occupational Safety and Health Administration (OSHA) standards, including the General Duty Clause of the OSH Act which requires employers to keep their workplace free of serious recognized hazards, to assure a safe
and healthful workplace.

In accordance with our SOPs, BrightCare NEPA will ensure our employees are accorded a suitable workplace environment free from recognized hazards that may cause death or serious physical harm. In doing so, we will comply with occupational safety and health standards promulgated under the OSH Act of 1970.

BrightCare NEPA expects each employee to comply at all times with occupational safety and health standards and all rules, regulations, and orders issued pursuant to the OSH Act which are applicable to his or her own actions and conduct. To facilitate, we will provide sufficient employee training, written SOPs, and written guidelines, as applicable, so all staff is knowledgeable about and can maintain compliance with these standards.

Notably, in accordance with Section 11(c) of the OSH Act, BrightCare NEPA does not discriminate against our dispensary agents for exercising their rights under the OSH Act. These rights include filing an OSHA complaint, participating in an inspection or talking to an inspector, seeking access to employer exposure and injury records, reporting an injury, and raising a safety or health complaint with the employer.

**Injury and Illness Prevention**

BrightCare NEPA will require dispensary agents to report to a supervisor any personal health condition that might compromise the cleanliness, sanitation, integrity, safety, or quality of our dispensary facility or the medical marijuana products the dispensary agent might handle, or that might impact the health and safety of patients, caregivers, visitors, or other staff members. To ensure this, BrightCare NEPA will require all agents to be thoroughly trained and tested on the dispensary’s retail pharmacy inspired SOPs, including ensuring a clean and sanitary workplace akin to a high-end pharmacy or medical office. All illnesses and health conditions reported will be treated with extreme precaution. Employees will never be reprimanded for disclosing a health condition to a supervisor.

When notified, supervisors will in turn notify the dispensary manager and the on-site pharmacist, physician, or other licensed healthcare professional of the circumstances of the employee’s health condition. Collectively, the dispensary manager and the onsite healthcare professional will use their best judgment to protect the interests of the dispensary, always erring on the side of caution. Optional action plans include:
• Addressing the situation to eliminate the possibility of a cleanliness or quality issue with medical marijuana which might be handled by the employee (such as providing gauze or a band-aid in case of a minor cut)
• Segregating the employee from interacting with other persons and prohibiting them from handling medical marijuana
• Sending the subject employee home for the day to rest
• Advise the subject employee visit the emergency room or medical specialist

If the condition is more serious, the subject employee will be asked to refrain from returning to the dispensary until cleared by a physician.

Upon any instance of a reported health condition, the employee’s personnel file will be updated by the Human Resources Department for historical recordkeeping purposes.

**Medical Marijuana Product Handler Restrictions**

BrightCare NEPA employees specifically working in direct contact with medical marijuana will additionally be subject to the restrictions on food handlers specified in 28 Pa. Code §27.153 (relating to restrictions on food handlers). Employees must conform to best hygiene and sanitary practices (inspired by the retail pharmacy industry) while on duty, including:

• Maintaining adequate personal hygiene
• Washing hands thoroughly in an adequate hand-washing area before starting work and at any other time when hands may have become soiled or contaminated, and at all times before dispensing medical marijuana to a patient or caregiver

Those employees failing to follow medical marijuana product handler restrictions may be subject to suspension or termination.

**Hand Washing Facilities, Lavatories, and Other Local Building Code Requirements**

BrightCare NEPA will provide our employees, patients, caregivers, and visitors with adequate and convenient hand-washing facilities furnished with running water at a temperature suitable for sanitizing hands. Such hand-washing facilities will be located within adequate, readily accessible lavatories that are maintained in a sanitary condition and in good repair. Effective non-toxic sanitizing cleansers and sanitary towel service or suitable hand drying devices will
be provided.

Additional hand-washing facilities will be located within the dispensary where good sanitary practices require employees to wash and sanitize their hands (e.g., in the employee break room).

Notably, BrightCare NEPA dispensaries will comply with all other applicable state and local building code requirements and will be ADA compliant.

**Medical and Safety Emergencies**

BrightCare NEPA will ensure all employees are properly trained to quickly recognize and handle a variety of emergency situations that may arise at the workplace, including but not limited to medical emergencies, fires, severe weather, chemical spills, and so on. To facilitate any actions taken to address an emergency situation, our dispensaries will be equipped with:

- First aid kits
- CPR instructional posters and materials
- Signage identifying the contact information for the closest emergency responders and hospital systems
- Smoke and carbon dioxide detectors (hardwired with battery backup power)
- Fire extinguishers
- Fire alarms
- Posters identifying the quickest escape routes from the facility in the event of a fire or other life threatening emergency

Notably, the dispensary manager will ensure that an adequate number of dispensary agents have advanced occupational first aid training and that at least one such trained employee is on duty during all hours of operation. To ensure staff adequately internalize our emergency response plans, management will conduct regular unannounced fire and other emergency drills throughout the year.

**Sanitation and Safety Training**

BrightCare NEPA will require all dispensary agents to be thoroughly trained on our sanitation and safety policies and procedures. Initial training begins upon hire and takes approximately 7-10 days to complete. All staff must complete initial training prior to commencing work.
Our training program comprises a series of classes, videos, workbooks, manuals, and one-on-one sessions to ensure compliance with dispensary rules, policies and procedures, sanitation and safety measures, Pennsylvania law and regulations, and job requirements and responsibilities. We will ensure trainees retain all pertinent information using multiple choice, open-ended question, and/or oral examinations upon the completion of each training session. Employees need to score at least a 75% in each subject before being permitted to work. As each examination has been successfully passed, trainees will be issued a certificate verifying mastery of the subject, a copy of which will be retained by the Human Resources Department for safekeeping.

At least once annually, staff must attend refresher training courses, including at least 1 hour of refresher training on sanitation and safety protocol. Failure to attend annual refresher training will be grounds for suspension and possible termination.

Sanitation and safety training topics include:

- Contamination prevention measures
- Contamination remediation measures
- Quarantine procedures
- IPM techniques
- Equipment maintenance, cleanliness, and sanitation procedures
- Facility maintenance, cleanliness, and sanitation procedures
- Waste and rubbish removal policies
- Inventory quality assurance inspection procedures
- Employee hygiene policy
- Proper hand-washing techniques
- Medical marijuana handler restrictions, including applicable food handler restrictions
- Product handling and storage
- Injury and illness prevention policies
- Emergency response procedures
- First-aid and CPR techniques
- OSHA compliance

Dispensary agents will be trained to keep in mind that the health and safety of patients/caregivers and staff takes priority over all else.
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:

Recordkeeping Processes and Policies

BrightCare NEPA will use established recordkeeping procedures adopted, and modified accordingly, from our medical marijuana dispensary affiliate in Washington DC (i.e., Takoma Wellness Center). This affiliate is owned and/or managed by COO Josh Kahn who has been safely and compliantly operating a medical marijuana dispensary since 2011 in strict compliance with the country’s most regulated medical marijuana programs. Josh’s unmatched, hands-on industry expertise will further ensure BrightCare NEPA will efficiently and effectively create and maintain all required reports, records, logs, recordings, and other important business data, information, and documentation. In accordance with protocol, the organization will create and maintain written and/or electronic records, as appropriate, and securely store them for a period of at least 4 years.

Electronic Recordkeeping Software

To generate and maintain electronic records, including but not limited to inventory and sales transaction records, BrightCare NEPA will utilize the MJ Freeway inventory tracking and recordkeeping software system (or a similar system capable of integrating with the Pennsylvania Department of Health’s (the Department) electronic tracking system). MJ Freeway is a widely utilized, proprietary seed-to-sale inventory tracking and recordkeeping system currently used by our medical marijuana dispensary affiliate.

MJ Freeway has the capability to track products from receipt from a grower/processor through the entire dispensing process, allowing for accurate real-time inventory records. Upon entering a product into the system, a unique product number will be issued for tracking and recordkeeping purposes. All actions taken to inventory as whole, by grouping, or by individual product will be digitally recorded for instant and long-term analysis purposes. Moreover, detailed sales records can be stored for several years. MJ Freeway also allows us to create precise inventory records at a moment’s notice, so any discrepancies or breaks in the chain of custody will become immediately apparent, igniting swift corrective action measures to investigate and resolve issues.
Generally, we will use MJ Freeway to track and record all actions related receiving, packaging, labeling, handling, transferring, transporting, storing, stocking, disposing, returning and recalling medical marijuana products in accordance with all applicable laws, rules, and regulations. In compliance with 28 PA Code §1161.32, BrightCare NEPA dispensaries will maintain the following inventory data, among other information, in our internal electronic tracking system:

- Medical marijuana received from a grower/processor
- Medical marijuana dispensed to a patient or caregiver
- Damaged, defective, expired, or contaminated medical marijuana awaiting return to a grower/processor or disposal

All entries into the MJ Freeway system will include the unique employee identification number of the staff member taking the relevant action so that we know who is/was responsible for each step in our integrated processes. All appropriately authorized staff members will be thoroughly trained in the use and functionality of the MJ Freeway software system to ensure the accuracy and integrity of our electronic recordkeeping system.

**Records and Record Retention**

BrightCare NEPA will adopt best security practices developed and implemented by our medical marijuana dispensary affiliate licensed in Washington DC in regards to records storage, including but not limited to surveillance footage, security records, patient records, sales records, inventory records, and other business records. All physical records, except for surveillance footage, will be securely stored in the dispensary manager’s office (which will be access-controlled) within a commercial grade storage cabinet, closet, or other secure place to protect them from tampering or theft. Only authorized and properly credentialed agents may access the records. All electronic records will be stored in MJ Freeway (or a similar electronic recordkeeping system) in a manner that is password protected, TLS/SSL encrypted, and accessible only to those authorized persons with proper credentials. Notably, all confidential patient records will be maintained in a HIPAA compliant manner protecting the personal and sensitive information of our patients/caregivers.
Surveillance Recordings

When requested, BrightCare NEPA will provide the Department or its authorized agents a current list of all authorized employees and service employees or contractors who have access to our surveillance room.

Within 1 business day following a request, we will provide up to 4 screen captures (or more if requested) of an unaltered copy of a video surveillance recording 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. In accordance with 28 PA Code §1161.31(b)(6)(ii), if one of our dispensaries has been notified in writing by the Department or its authorized agents, law enforcement or other Federal, State, or local government officials of a pending criminal or administrative investigation for which a recording may contain relevant information, BrightCare NEPA will retain an unaltered copy of the recording for 4 years or until the investigation or proceeding is closed or the entity conducting the investigation or proceeding notifies the dispensary that it is not necessary to retain the recording, whichever is longer.

Human Resources Records
BrightCare NEPA’s Human Resources Department will retain records of job applicants and employees, including but not limited to job applications, signed registration forms, signed employment agreements, State and Federal criminal background reports, annual reviews, initial and refresher training certificates of completion, etc., in accordance with our Human Resources policies. Human Resources will also retain electronic and hardcopy versions of all training materials and attendance records for at least 4 years. All employee files and other relevant records will be made available for inspection by the Department upon request.

**Diversity Plan Records**

BrightCare NEPA is committed to our diversity plan and will keep accurate records to ensure its implementation, ongoing improvements where needed, and reporting. We will maintain applicant and employment records that reflect recruiting activities, the number and characteristics of applicants and employees, and our employment practices, such as hires, transfers, promotions, compensation decisions, and terminations. This includes maintaining applicants’ voluntary self-report form on race, ethnicity, and veteran, veteran-disabled, and disability status. This information will help us analyze whether we are attracting a diverse pool of applicants.

Additionally, BrightCare NEPA will keep materials evidencing our affirmative action efforts. This includes items such as copies of documents that indicate employment policies and practices, copies of letters sent to suppliers and vendors stating the EEO/affirmative action policy, copies of letters sent to recruitment sources and community organizations, and copies of contract language incorporating the regulatory equal opportunity clauses 41 CFR 60-1.4, 60-300.5, and 60-741.5.

Furthermore, BrightCare NEPA will maintain documentation of the following as part of our internal AAP/EEO auditing and recordkeeping system:

1. An applicant flow log showing the name, race, sex, date of application, job title, interview status, and the action taken for all individuals applying for jobs
2. Log of job offers, hires, promotions, resignations, terminations, and layoffs by employment category, gender, and diversity group
3. Employment applications
4. Compensation records

BrightCare NEPA will report on the participation level, by percentage, of diverse groups as owners, managers, staff, contractors, and professional service providers. These reports will include reports on promotions and advancements of individuals who are members of diverse
groups, along with dollar amounts contracted to businesses representing diverse groups. These reports will be in addition to anything explicitly required by the state.

**Inspections, Servicing, Alteration, and Maintenance Records**

BrightCare NEPA will conduct maintenance inspections at least once every month to ensure all tools and equipment are in good working condition and that any repairs, alterations or upgrades to the alarm, security, and surveillance systems are made for the proper operation of the systems. Staff will keep written logs of all maintenance activities performed which record the dates, times, affected equipment, actions taken, and the name and employee identification number of the agent performing the maintenance. We will retain records of all inspections, servicing, alterations, and upgrades performed on the systems for at least 4 years and will make the records available to the Department and its authorized agents within 2 business days following a request.

Pursuant to standard operation procedures (SOPs), BrightCare NEPA will also maintain an accurate log recording the calibration of dispensing equipment, the maintenance of dispensing equipment, and the cleaning of dispensary equipment. Dispensary agents will be properly trained on calibration and recordkeeping protocol.

**Patient/Caregiver Records**

In accordance with BrightCare NEPA check-in procedures, only those patients/caregivers who: (a) present current and authenticated identification documents, including a current government-issued identification card, Department-issued patient or caregiver identification card, and practitioner-issued patient certification documents with matching information, (b) have been verified in the Department’s database by authorized staff, and (c) have not already received their full allotment of medical marijuana (as determined by a review of the physician certification against the patient’s purchasing history records in the state’s database and our own internal inventory tracking program) may qualify to be dispensed medical marijuana products, so long as such dispensation does not exceed state-mandated or physician-mandated quantity limits. Upon each patient/caregiver’s first visit to our dispensary, a HIPAA compliant patient/caregiver file will be created which will contain:

- Completed patient/caregiver intake forms
- Signed releases, authorizations, acknowledgements, and other important legal documentation
- Copies of all identification documents provided to the dispensary
- Copies of the practitioner certification (including copies of all certification renewals)
Notes on special accommodations or treatment requested for the patient/caregiver

Upon the conclusion of our patient/caregiver check-in process, authorized dispensary agents must accurately update the state’s electronic tracking system with relevant information related to the visit (e.g., the time and date of the visit) using a computer or a portable tablet with internet connectivity assuring access to the database. Staff must also update the organization’s own HIPAA compliant, MJ Freeway electronic recordkeeping system with the pertinent information.

Patient/caregiver records will be updated upon each visit to our dispensary and will include all attempted and successful dispensations.

Dispensing Transaction Records

Prior to any dispensation, the service area agent will re-confirm (a) that the products ordered are compliant with any recommendations, requirements, or limitations set forth in the patient’s practitioner-issued certification, and (b) the quantity ordered does not exceed state-mandated or physician-mandated quantity limits by reviewing the patient’s purchasing history records in the state’s database and our own internal inventory tracking program. If the order is lawful, the agent will inspect each product’s packaging and labeling to ensure integrity and compliance with Pennsylvania law, then complete the dispensation process and accept payment.

Upon the successful completion of the transaction, the agent will issue a transaction receipt then access and update the patient certification in the Department’s electronic tracking system with information recorded on the receipt, including:

- The name, address, and permit number assigned to BrightCare NEPA
- The name and address of the patient and, if applicable, the patient’s caregiver
- The date and time of dispensation
- Any requirement or limitation noted by the practitioner on the patient’s certification as to the form of medical marijuana that the patient should use
- The quantity, type, and form of medical marijuana dispensed
- Any other required data, including all information found on the applicable transaction receipt

In accordance with 28 PA Code §1161.23(d), except as provided in Sections 2001-2003 of 35 P.S. §§10231.2001-10231.2003, applicable staff will destroy any paper copy of the patient certification or delete any electronically recorded patient certification stored on the
dispensary’s network, server, or computer system as the result of a transaction after the receipt relating to that transaction has been filed with the Department through its electronic tracking system.

Upon each completed transaction, BrightCare NEPA will update the Department’s electronic tracking system with the information contained on the dispensation transaction receipt, thereby ensuring real-time, accurate information on patient/caregiver dispensing activities are readily available to system users. If applicable, the agent will also update the Department’s electronic tracking system with any recommendations as to the form or dosage of medical marijuana that is provided. Thereafter, the dispensary agent will record identical information in MJ Freeway. All information recorded into the two systems must match.

If a patient/caregiver attempts to acquire an unauthorized or non-compliant quantity of products, staff must deny the attempted transaction. Upon each instance of denial of service, staff will update the state’s electronic tracking system as well as BrightCare NEPA’s internal patient records.

Visitor Records

Generally, only authorized employees, patients/caregivers, and the Department or its authorized agents, or other Federal, State, or local government officials performing their official functions and duties may enter our dispensaries. When admitting a visitor, BrightCare NEPA will require the visitor to sign a visitor log upon entering and leaving the limited access area. The dispensary will maintain the visitor log in digital and hard copy for 4 years and make the log 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. The log will include:

- Full name of each visitor
- Visitor identification badge number
- Time of arrival
- Time of departure
- Purpose of the visit
- Name and employee identification number of the assigned escort
- List of all areas visited
- Name of each employee visited

A copy of the visitor’s identification documents will be affixed to the visitor log and stored for recordkeeping purposes.

Transport Manifest and Shipping Records
In accordance with 28 PA Code §1161.36, BrightCare NEPA will generate printed and electronic transport manifests for each product shipment to accompany every transport vehicle should we ever transport medical marijuana. The manifest will, at a minimum, identify:

- Our name, address, and permit number
- The name and contact information for a dispensary representative who has direct knowledge of the transport (i.e., the dispensary manager)
- The name, address, and permit number of the medical marijuana organization receiving the delivery
- The name and contact information for a representative of the receiving medical marijuana organization
- The name of the dispensary agent that packaged/shipped the shipment
- The quantity, by weight or unit, of each medical marijuana batch or lot contained in the transport, including each batch/lot identification number
- The total number of individual packages/items in the shipment
- 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 numbers of each transport agent accompanying the transport

In any instance where the transport team is tasked with multiple deliveries within a single planned trip, BrightCare NEPA will create separate transport manifests for each recipient which correctly reflects the specific medical marijuana in transit. Accordingly, each recipient must provide our team with a printed receipt for the medical marijuana received.

In accordance with company protocol, BrightCare NEPA will provide a copy of the applicable transport manifest to the recipient receiving the medical marijuana described in the transport manifest at least 1 day in advance of the scheduled delivery. Upon arrival, the transport team will provide a second copy of the transport manifest which may reflect any amendments or updates.

For quality assurance purposes, each transport manifest must be reviewed for accuracy and compliance and approved by the dispensary manager, or an authorized designee, who must record their approval prior to providing a copy of the manifest to the recipient and releasing the shipment for delivery.

Additionally, BrightCare NEPA will generate and maintain records the following transportation records:
• All daily delivery schedules, including routes and delivery times (i.e., the trip plan)
• Any vehicle accidents, diversions, losses, or other reportable events that occur during transport of medical marijuana

Staff will immediately report the above 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.

• All transfers of product from the vault room to the receiving area for shipment preparation
• All information contained on the packaging label and the transport manifest, including the name and address of the recipient
• All transfers of product from the receiving area to the transport vehicle, including all loading activities
• All transfers of product from the transport vehicle to the recipient, including all unloading activities
• The results of all audits and product packaging/labeling inspections
• The name of the person(s) making the entry, packaging the shipment, and completing the transport to maintain an unbroken chain of custody report
• The name and employee identification numbers of the dispensary manager or security manager overseeing the transport activities
• The name and employee identification numbers of all staff participating in the transport activities
• The date and time of shipment departure
• Trip plan details, including the route of delivery
• If applicable, any deviations from the trip plan, including time, location, reason for the deviation, and any trip plan modifications/updates
• The date and time of shipment arrival
• The date and time of the transfer of custody of the products
• The name and permit number of the recipient
• The names of all receiving staff from the recipient who participate in the delivery process

Upon request, we will provide copies of any transport manifest, printed receipts, and/or any other transportation related record to the Department or its or its authorized agents, law
enforcement or other Federal, State, or local government officials if necessary to perform the
government officials’ functions and duties.

Product Receiving Records

BrightCare NEPA will implement standard operating procedures (SOPs) compliant with
Pennsylvania’s Medical Marijuana Act and regulations, which will assure the integrity of the
recordkeeping system in relation to product receiving.

- The name and unique identification number of the dispensary manager or security
  manager overseeing the receiving activity
- The name and unique identification number of all employees participating in the
  receiving activity
- Visitor log identifying all transport agent names and registration numbers who
  were responsible for the delivery (which will be maintained and stored with a
  photocopy of all identification documents provided to security)
- A copy of the transport manifest
- Confirmation that the physical audit of shipped products matches the transport
  manifest
- Any discrepancies between the physical audit and the transport manifest, including
  all remediation actions and investigations taken
- The results of each packaging/labeling quality assurance inspection
- Each accepted medical marijuana product, including all identifying information
- The date and time of commencement of the receiving procedures
- The date and time the dispensary took custody of the products
- A copy of the delivery transaction receipt

Upon the successful conclusion of receiving activities, receiving agents will:

- Ensure all new products have been successfully entered into our MJ Freeway inventory
  tracking and recordkeeping system with a unique product identification number
- Enter all pertinent product information in the Department’s electronic tracking system

Once the above has been confirmed, receiving agents will re-enter the interior of the
dispensary and immediately transfer all new products to the appropriate safe (or locking
refrigerator or freezer, as applicable) within the secure vault room. As products are placed into
storage, they will be carefully accounted for and inspected again to guarantee they are suitable for dispensation to patients/caregivers.

Once a new product transfer has been completed, receiving agents will again update the MJ Freeway system with all actions taken to the products. The dispensary manager will compare the completed inventory reports against the transport manifest to ensure the accurate entry of all received products in the inventory control system.

Inventory Stocking Records

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Inventory Audit Records

BrightCare NEPA will establish inventory controls and procedures to conduct routine scheduled as well as unannounced daily, monthly, and annual inventory audits to confirm that our physical inventory matches our digital records stored in MJ Freeway. A written record will be created and maintained for each inventory audit which will include the date of the inventory audit, a summary of the inventory findings, and the names, signatures, and titles or positions of the individuals who conducted the inventory. All audit reports will be recorded digitally and in hard copy. All electronic records will be securely stored onsite for a minimum of 4 years and backed up for secure offsite storage.

Recalls and Returns Records

BrightCare NEPA will notify the Department and the grower/processor immediately upon becoming aware of any complaint made to the dispensary by a patient, caregiver or practitioner who reports an adverse event from using medical marijuana dispensed by BrightCare NEPA dispensary. The dispensary shall cease dispensing the affected medical marijuana and coordinate the return of the recalled medical marijuana with the grower/processor. All information related to the recall, including all steps taken to transfer products, will be recorded in MJ Freeway, including:

- A copy of the complaint
- The name, address, permit number of the originating grower/processor who manufactured the affected product
- The name, product type, quantity, and unique product identification numbers of all
recalled products
- Nature of the recall or complaint
- The name, contact information of the purchasing patient/caregiver, and date of dispensation
- The date and time of any returned products
- The date and time of the product transfer to the quarantine room
- The name and identification number of all employees participating in any recall or product transfer activity
- If applicable, the date and time of product pickup from or transportation to the originating grower/processor for purposes of destruction and disposal, including the employee identification numbers of all staff participating in each step of the pickup/transportation activities
- If applicable, the date and time of product destruction and/or disposal, including the method of destruction/disposal and the employee identification numbers of all staff participating in each step of the destruction/disposal activities

Upon identifying or receiving any returned, unfit (including but not limited to expired, damaged, deteriorated, mislabeled, or contaminated products), and/or recalled medical marijuana products, the dispensary manager will immediately update the Department’s electronic tracking system.

If applicable, BrightCare NEPA will have all recalled, returned, or otherwise unfit medical marijuana transported back to the originating grower/processor. All medical marijuana handled in these circumstances must be continuously tracked using MJ Freeway.

Business Records

In accordance with 28 PA Code §1161.29 as well as industry best practice, BrightCare NEPA will create and maintain the following business records:

- Employment policies and procedures
- Facility rules, guidelines, and policies
- Training materials
- Employment handbooks, manuals, and other documents
- Security policies and procedures, including:
  - Staff identification measures
  - Monitoring attendance of staff and visitors
  - Alarm system plan
  - Video surveillance plan
  - Monitoring and tracking inventory
Personnel security
- Policies and procedures for receiving, packaging, labeling, handling, tracking, transporting, storing, disposing, returning, and recalling products containing medical marijuana in accordance with all applicable laws, rules, and regulations
- Workplace safety policies and procedures
- Maintenance, cleaning, and sanitation policies and procedures for the site, facility, tools, and equipment
- Inventory maintenance and reporting procedures
- Policies and procedures to investigate complaints and potential adverse events from other medical marijuana organizations, patients, caregivers, or practitioners
- The use and functionality of the electronic tracking system prescribed by the Department
- Other plans of operation
- Annual budgets, financial forecasts, and other business planning reports
- Transaction and sales records
- Expenses and expenditures records
- Inventory audit records, both internally and independently produced
- List of all current management and employees, including a separate list of all employees permitted to access any security and surveillance areas
- List of all company vendors, contractors, consultants, and permitted grower/processor manufacturers
- All notices and written communications with the Department
- Other business records used in the operation of our dispensaries

All business records, including full and complete plans of operation, will be made available to the Department upon request and during any inspection of our sites and facilities.

Other Records, Logs, and Reports

BrightCare NEPA will maintain many other records, logs, and reports which are not identified above, including but not limited to:

- Employee access logs, including the dates, times, and identities of those who entered/exited the dispensary itself and those who entered each restricted-access area within the dispensary
- Facility and equipment maintenance, sanitation, and cleaning logs
- Quarantine transfer logs and inspection reports
- Product destruction and disposal records, including date, time, and method of destruction/disposal (if applicable)
- Security incident reports, including:
  - Reports of attempted breaches/break-ins
  - Reports of vandalism, theft, violence, and other crimes
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

- Reports of the expulsion of persons from the premises
- Smoke, fire, and other alarm notifications
- Copies of police reports related to any event taking place on the site
- Diversion and other criminal activity internal investigatory reports, including preliminary reports, 7-day follow-up reports, and final reports written within 30 days of the applicable incident
- Inventory discrepancy reports
  - Loss of power reports
  - Reports of emergency events (e.g., fire, flood, other natural disasters)

Part E – Applicant Organization, Ownership, Capital and Tax Status
(Scoring Method: 150 Points)

SECTION 18 – ORGANIZATIONAL STRUCTURE

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<tr>
<td>PA Unemployment Compensation Account Number:</td>
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<td>n/a</td>
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<tr>
<td>PA Department of Revenue Tax number (if applicant is currently doing business in)</td>
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<td>PA Workers’ Compensation Policy Number (if applicant is currently doing business in)</td>
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The applicant affirms that workers’ compensation insurance will be obtained by the time the Department determines you to be operational under the Act and regulations.

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SECTION 19 – BUSINESS HISTORY AND CAPACITY TO OPERATE

Described your business history and your ability and plan to maintain a successful and financially sustainable operation:

Business Acumen and Marketing Plan

BrightCare NEPA was formed by Samantha Edwards who has assembled a group of woman and business professionals with significant experience as entrepreneurs and healthcare providers for the purpose of applying for a medical marijuana dispensary license in the Northeast Health Regions of Pennsylvania. BrightCare’s focus is to dispense pharmaceutical grade medical marijuana for the treatment of serious medical conditions. BrightCare’s mission is to follow a commercialization strategy that is modeled on the more traditional pharmaceutical companies and specialty pharmacy organizations. BrightCare’s Executive Management team and Professional Advisory Board are comprised of a majority of Pennsylvania natives with significant experience in business, finance, law enforcement, medicine, regulatory compliance, pharmacy, research, controlled-substances manufacturing, and the medical marijuana profession. BrightCare and its multi-state partner, Holistic Industries LLC (MD) and Tacoma Wellness Center (DC) have formed one of the strongest partnerships in Pennsylvania.

BrightCare NEPA believes local ownership with managing partners currently operating nationally is a key differentiator for them. The BrightCare team has extensive specialized experience in developing successful business enterprises which can withstand the growing pains of the new medical marijuana program, we also bring a significant degree of broader business experience, many years of expertise in the legal sale of controlled substances, national company leadership, an entrepreneurial spirit, world class medical and pharmaceutical professionals, and a deep personal interest in the well-being of those who suffer with the serious medical conditions that Pennsylvania’s Medical Marijuana program is designed to alleviate. BrightCare’s flaunts substantial, and directly relevant, business experience in highly regulated, and in many cases customer-facing, industries beyond Medical Marijuana. Examples include, GlaxoSmithKline, Merck Pharmaceuticals, Johnson and Johnson (pharmaceutical sales and marketing), Medtronic (medical device sales and business development). With decades worth of strong regulatory compliance history both within and beyond medical marijuana businesses, our impeccable integrity, acumen, transparency, and
attention to detail is unrivaled.

**Key Competitive Differentiators**

- Local Pennsylvania Ownership Supported by Experienced Dispensary Operator.
- Some of the most successful Entrepreneurs and Innovators in Pennsylvania coming together to make a real difference to people in need.
- One of the most experienced security and diversion experts on any PA application with 30 years of law enforcement experience and extensive experience in security operations within the Medical Marijuana Industry.
- Direct Access to Major Health Networks Executives and Boards of Director.
- Our Team includes a Medical Director and Medical Staff from the Major Hospitals and Health Systems in the Region.
- Significant Capital with 36.7 million in total capital of which $3.2 million is in cash to Execute on our Strategy along with the Financial Discipline needed to keep MMJ prices AFFORDABLE for all patients.
- Detailed Market Development Strategy with High Level Professionals Ready to Execute.
- Unparalleled Key Industry Leaders.
- Legitimate Experience in Highly Regulated Industries.
- A Corporate Culture of Promoting Innovation, Perpetual Improvements and Diversity.
- Partnerships with Leading Medical and Education Institutions in Pennsylvania.
- BrightCare’s NEPA is comprised of one of the most diverse groups of women as well as ethnic and religious minorities in Pennsylvania applying for a license.
- Substantial local, regional and state level support including community leaders, religious institutions, Colleges & Universities, pediatric cancer organizations, epilepsy organizations, LGBTQ organizations, veteran’s groups, and many other groups.

**Leading Success Indicators**

For BrightCare other tangibles as well as intangible attributes will clearly set it apart from any competitors in the Commonwealth of PA. We believe the following key elements will allow us to stand tall over any other applicant we are compare to:

- Deployment of a revolutionary technology platform that we’ve exclusively developed. **ICOS-Integrated Cannabis Outcomes Solutions** (trademark/patent pending) is a one of a kind technology platform aimed tracking the outcomes of the individual strains and products that we dispense. This technology will not only put Pennsylvania at the forefront and cutting edge...
of this emerging medical based industry but it will also address a need that is currently a major deficiency in the medical cannabis industry across the entire United States. If awarded a license we will lead the nation in this industry within 2-3 years and intend to be pioneers through our ICOS system. We intend to utilize NEPA as the epicenter of our project and grow hundreds of jobs over time.

☐ We have already established a Pharmaceutical Sales and Business Development Team that will grow the market in Pennsylvania. The team currently consists of 8 Reps that are ready to hit the ground running. This team is ready to be deployed as early as 2 weeks from when a license is awarded. The team is made up of true leaders in the pharmaceutical industry. We do not believe we can be rivaled in this area. We intend to grow the market of certifying physicians and have established an internal target of developing a base of 4,000 certified patients by the end of year 1. We do not believe any other operators will come close to us in this respect.

☐ Our Partnership with several education institutions and healthcare related partners will clearly distinguish BrightCare. Our partnership with one of the best Pharmaceutical Universities in the United States clearly sets us apart from where are competitors are. The University of Sciences in Philadelphia is nationally known as pioneers in educating Pharmacists, Pharma Reps and many other scientific based professionals. UofS will be working with BrightCare on development of and oversight of a pharmacy based care delivery model, market development strategy, and finally the development and deployment of technology based training tools for educating physicians and patients on our products. Please call your attention to our strong letter of support from Dr Katz, President of the University of Sciences. Again we’ve focused on the other tangibles and intangibles of successfully growing a market.

☐ We have met with and presented our plans and coordinated efforts with some of the most well known organizations that will be at the forefront of advocating for there patient populations. WE know that other organizations have not garnered the support of these groups as our discussions and relationship have been exclusive. We will be partnering with the following key organizations:

  o Pediatric Cancer Foundation
  o PA Epilepsy Foundation
  o Veterans groups
  o Academic Institutions
  o LGBT Advocacy Groups
  o Community Officials

We believe strongly that intangibles like those outlined about are what will make the difference in this program being successful in Pennsylvania.

Leadership
BrightCare NEPA CEO Josephine S. Vitale has spent her career in Pharmaceutical, Biotechnology and the Medical Device Industries working in sales, marketing, strategic business development, and health system contracting. Josie has successfully launched countless new products throughout her career. She is poised to use her extensive experience in penetrating hard to reach physicians and health systems to grow the medical marijuana market in Pennsylvania. Josie understands exactly what it’s going to take to launch medical marijuana in Pennsylvania because throughout her career she has been successful in every market in the state and beyond, from Pittsburgh to Philadelphia as far south as Virginia and as far north as Buffalo, NY. In order for the industry to deliver on the promise of these new medications the industry must be fiscally strong and will need a consistent and steady increase in patients to remain viable. Under Josie’s direction BrightCare NEPA plans to implement a strategic care adoption platform and pharmaceutical marketing program to educate consumers, caregivers and physicians.

Josh Kahn, will serve as Chief Operations Officer for BrightCare NEPA. Josh comes to BrightCare NEPA from Takoma Wellness Center (TWC) one of Washington D.C.’s most successful dispensaries, where he also serves in the COO role. Tacoma Wellness Center has a proven track record of demonstrating stellar patient care, responsible business practices and successful community relationships. TWC is the only dispensary in D.C., and one of only a handful in the country, certified as 'Patient Focused' by Americans for Safe Access (ASA). ASA has been selected to provide training for compliance inspectors operating under the authority of the Natalie M. LaPrade Maryland Medical Cannabis Commission. To be certified PF (Patient Focused) Dispensaries undergo a rigorous evaluation and must be re-certified annually. In September 2016, Takoma Wellness Center received this certification for the second years in a row. Under Josh’s direction BrightCare NEPA will seek similar certifications and continue to operate with a patient centric medically focused model which has made his Washington D.C. dispensary so successful.

As a result of the significant business history of the BrightCare Team we understand that the most successful companies around the world promote the importance of a diverse workforce and culture. BrightCare NEPA is pleased to have Alan Paynter, Diversity and Inclusion Officer on this impressive team. Alan has been working with youth and families for over 20 years to increase the diversity in higher education. Alan is a Director of Admissions in a highly selective liberal arts college in Pennsylvania and he travels the country speaking to students and families about the extraordinary opportunities available to them in a good college education. He spearheads the college’s diversity recruitment efforts and his desire to guide these students emerges from his own background. Alan has developed and implemented specific affirmative action, diversity and inclusion protocols aimed at ensuring the leaders, managers and employees of BrightCare can meet the diverse needs of all our patients, health care practitioners and caregivers.

Giro T. Hall, CFO brings 20 years of executive, operational and financial leadership to BrightCare NEPA. He is the Chief Operating Officer of Horizon Facility Services (and its subsidiaries MLS and PMC) a national company in scale and size with more than 3,000 employees operating in 20 states. Tom co-founded Horizon Facility Services less than 7 years
ago as only a two-employee company. Today the company operates in one of the most complex logistical environments all while providing services to some of the largest companies in the world. Prior to founding Horizon Facility Services Tom was the Corporate Controller with two major U.S. Companies and also served as Audit Manager in a large regional public accounting firm. Tom’s experienced is focused in accounting and finance, business services and logistics. The combination of this experience will serve BrightCare NEPA well during its startup and execution phases. Tom grew up in Loyalville, Pennsylvania and earned his accounting and marketing degrees from King’s College in Wilkes-Barre, Pennsylvania.

BrightCare NEPA Security Manager, Ismael Vince Canales, brings nearly 30 years of leadership, public service, and law enforcement experience to BrightCare. Mr. Canales was elected in 2014 as President of the Maryland State Fraternal Order of Police, which has over 20,000 members. He began his career in public service as soon as he completed high school, enlisting in the United States Air Force in 1986. He served in the Air Force for six years, including a tour in Operation Desert Shield, where he earned U.S. Air Force Commendation and an Achievement Medal for his service in Iraq. Mr. Canales was born in Philadelphia and is proud of his Puerto Rican heritage, he has dedicated his career to serving his fellow citizens. Mr. Canales serves as Chief Security Officer for a Maryland medical marijuana grower and processor licensee, Holistic Industries LLC with his extensive law enforcement experience and his tenure in the Medical Marijuana industry he is well positioned to lead our security team.

Mike Molewski, is a member of BrightCare NEPA’s Board of Directors. He is a native of Wayne County and is a titan in the financial services and wealth management industries. Hard work and perseverance allowed Mike to pull himself out of abject poverty to lead one of the nation’s largest financial services wealth management firms. Mike along with his wife Diane will serve on BrightCare NEPA Board and ensure the organization’s long term growth and financial success. Mike started his own financial advisory firm when he was just 24 years old. MFP Strategies provided consultation on all aspects of wealth management and financial strategies with an initial client portfolio of $30 million. Over 15 years Mike grew the company to approximately $5 billion in assets. Mike attributes his success to the hands dirty hard work instilled in him as a child. The type of work ethic and determination you just can’t teach. He employed over 25 professionals before merging with CapTrust Partners in 2015, through this merger Mike and the partners of MFP Strategies became the 3rd largest shareholders in CapTrust, a national firm with over $200 Billion in assets, 20 offices and 375 employees. Mike’s business and financial acumen will ensure success for BrightCare NEPA.

Dr. Farooq Qureshi, MD will serve as BrightCare NEPA’s Chief Medical Officer. Dr. Qureshi currently serves as Pain Management Attending Physician at St. Luke’s University Health Network. Dr. Qureshi, one of the regions top pain management physicians, will lead BrightCare’s efforts to educate physicians in selective sub-specialties to isolate patient populations in demand of new treatment options. It is widely recognized that chronic intractable pain represents the largest market potential with regard to patient prevalence. Dr. Qureshi and his medical team will directly target this population as well as directly respond to the common concern around the opioid crisis. Dr. Qureshi plans to create the infrastructure to address chronic pain syndrome through the appropriate use of medicinal
marijuana. This plan creates a care volume matrix that will guarantee the economic health of BrightCare while actively reducing the number of opioid pain prescriptions in the Commonwealth. Under his guidance and leadership, BrightCare will implement a broad based physician targeting and adoption program to educate, train and facilitate certification of physicians during build-out phase of the proposed dispensaries to evade the slow market maturation seen in other states. The day BrightCare is granted a license, staff, lead by Dr. Qureshi will begin the physician outreach and education efforts for special populations. Dr. Qureshi is widely respected in the region and has extensive interventional and pain medicine experience and often conducts clinical research for the worlds foremost medical device companies. The medical and clinical acumen of the BrightCare medical team is unmatched.

Judith Pryblick, D.O. will serve as BrightCare NEPA’s Professional Education and Outreach Officer. Dr. Pryblick is a very successful family practice physician with the St. Luke’s University Health Network. Her 26 years of experience in family medicine has earned her a reputation of being one of the top family doctors in her region. It is widely recognized that Family Practice and Primary Care physicians are the gatekeepers of medicine and in many ways will directly dictate the program’s success or failure. BrightCare intends to continue its practice of engaging with local primary care physicians and provide the necessary information to guide them in their decision to recommend Medical Marijuana as a treatment option under Dr. Pryblick’s guidance. Most notably, Dr. Pryblick served on the executive committee of the American Medical Society and chaired the Rules and Credentials Committee of the Pennsylvania Medical Society. She is a past president of the Lehigh County Medical Society and formerly served on the Medical Executive Committee of St Luke’s University Health system.

BrightCare NEPA Founding Partner Samantha Edwards is an entrepreneur and inspirational leader. Spending a majority of her career as an Educator, she has earned multiple awards and has been published for her innovative work in educational design and technology integration. As a visionary leader in her field, her presence is often requested on strategic planning committees, development teams, as well as community outreach programs. As a Founding Partner and Patient Education Manager, Samantha will develop and manage new patient based training while integrating technology initiatives. She will also lead BrightCare NEPA’s Patient Educational Outreach teams. These teams will provide knowledge and experiences through educational programs to increase awareness of the palliative benefits and healing properties of medical marijuana. Samantha was born and raised in Wayne County, Pennsylvania, and currently resides in the Lehigh Valley with her wife and two sons. She looks forward to advancing her professional career in an industry where she can continue to make a difference by helping others. Through her experience in the LGBTQI community Samantha is well positioned to engage in much needed community outreach to met the needs of these individuals.

**Market Development**
BrightCare NEPA will be an innovative entry into the Pennsylvania medical marijuana program and will focus on patient outcomes. For BrightCare our most important product will be the efficacy and outcomes data we generate through our formal partnerships with University of the Sciences, Bloomsburg University and King’s College to survey our post-market products. Our exclusive relationship with University of the Sciences will allow ongoing consultation on many areas including medical-technical writing, pharmaceutical marketing, physician and patient education platforms aimed at increasing the available consumer market and post-market product survey analysis for Health Economics and Outcomes Research.

As with any new market, proper development is critical to the long term success of that market. The marketing professionals at BrightCare have unparalleled experience in sales and marketing development in the healthcare sector. Utilizing a combination of existing relationships, education, and referral development, one addressing the provider and the other the patient, BrightCare will ensure the greatest likelihood of market success. When a new product is launched in the healthcare market, it is not a “rush to the door” effect by either providers or patients. The healthcare industry is very much based on trust. Before a physician would consider obtaining certification to prescribe medical marijuana, or any new therapy option, a high degree of trust must be established with the physician and the sales professional. This process can take months and sometimes years to develop. When establishing a new medical market, this “trust building” phase would make for a slow therapy adoption and possibly result in market failure. The patients suffering with serious medical conditions in Pennsylvania can’t afford a market failure due to ineffective market development. The experienced professional sales team at BrightCare NEPA have an extensive and established network of physicians within the primary care, interventional pain management, neurosurgical and many other specialties. BrightCare will be able to benefit from these relationships and would greatly reduce and/or eliminate the trust building phase, thus allowing for rapid market development. In other states where the market has failed to develop quickly, the traditional sustaining principle of Medical Marijuana market development strategy has been an “if you build it they will come” approach. BrightCare NEPA will disrupt this dynamic.

Educational Outreach: Education takes two forms in the healthcare marketing. Physician education and patient education. Physician education consists of first building trust, presenting clear and concise data and continually updating the physician with the latest clinical data. The presenter must be an expert on the data so the physician has little doubt he/she is prescribing the best option for their patient. Furthermore, the presenter must have an understanding of the regulations concerning inducement and off-label promotion (in the case of MMJ not promoting for unapproved uses) to remain compliant. The BrightCare team has several professional sales representatives who have developed new markets for both pharmaceuticals and medical devices highly regulated environments. The sales professionals at BrightCare NEPA have successfully created these markets by presenting Level 1 RCT data, staying abreast of the latest rules and regulations regarding healthcare education and continually following-up with physicians on clinical data.

Patient education can take many forms, including, spending a day in clinic with a physician and educating the individual patients selected by the physician, holding large community
outreach programs attended by many patients with company representatives and physicians on hand to answer questions. Again, these events must conform to all state regulations in order to ensure compliance. BrightCare NEPA will employ all of these approaches plus additional activities where necessary in order successful educate patients.

Certification Follow-Up: Once a physicians have been properly educated, this does not mean the physician will automatically apply for certification, even if eager to do so. Physicians, by the very nature of their work, are extremely busy individuals. If there is no follow-up protocol in place for certification, many physicians will not take time out of their day to complete the certification process. This is not unlike the medical device industry. The majority of medical devices require either certification by the company and sometimes the FDA before use. Because of the experience of the BrightCare NEPA team, it is recognized that a follow-up protocol must be implemented so the market can be established quickly and sustainably.

Growth: Upon market establishment, market leaders must then transition to growth mode. Again, a twofold approach is necessary for growth, patient and physician. Furthermore, because of the unique nature of the healthcare industry, the typical methods of sales and marketing do not always apply. This is to say that a marketing or salesperson from a pharmaceutical or device manufacturer cannot contact a patient, pitch their product and make a “sale.” Because of the established laws and regulations (HIPAA for example), this type of activity is prohibited. However, members of the BrightCare team have made thousands of sales in the pharmaceutical and device industries and have done so successfully without direct patient contact. BrightCare NEPA will achieve rapid growth through utilization of referral development (patient) and speaker programs (physician) because of their industry knowledge and experience.

Referral Development: Refers to bringing two physicians of different specialties together for the purposes establishing a relationship and patient referral network. For example, if an interventional pain physician is certified to prescribe medical marijuana and a local family care physician is not, a meeting is setup between the two physicians so the family care physician feels comfortable referring his/her patients to the interventional pain physician for the prescription of medical marijuana. This allows more patients to access certain treatments with fewer number of certified physicians, thus growing the patient population. BrightCare NEPA professional sales and marketing staff have extensive experience and training in referral network development.

Sustainability: The way to sustainability in the healthcare market is through developing key opinion leaders (KOL’s), these are physicians who have significant experience with this new therapy, establishing strategic partnerships for product feedback, and innovation. This is accomplished through identifying physicians for development into KOL’s, entering into relationships with objective physicians and institutions and responding to the needs of the physicians and patients through collaboration. BrightCare NEPA has many talented individuals who have developed numerous KOL’s, identified physicians and institutions and consistently report on physician and patient feedback driving innovation and resulting in a better product.
Development and Use of Clinical Data: BrightCare NEPA will be an innovative entry to the Pennsylvania medical marijuana program and will focus on patient outcomes. For BrightCare our most important product will be the efficacy and outcomes data we generate through our formal partnerships with University of the Sciences, Bloomsburg University and King’s College to survey our post-market products. Our exclusive relationship with University of the Sciences will provide on-going consultation on many areas including medical-technical writing for product labeling and IFU, pharmaceutical marketing, physician and patient education platforms aimed at increasing the available consumer market and post-market product survey analysis for Health Economics and Outcomes Research. Creating a market value on patients rather than products will ensure a more responsive increase in the maturation of the patient/provider market. This focus on patient outcomes is a more specific reflection of the way typical pharmaceutical agents are adopted by physicians and providers. Physicians analyze outcomes data in specific patient populations and implement these new treatment options where patients can medically or symptomatically benefit.

BrightCare NEPA extensive sales and marketing experience in pharmaceutical and biotech market development along with it’s University of Sciences partnership will allow for a specific targeted physician adoption platform to address commercialization issues seen in other state’s. Currently, there are about 155 patients registered under the Act 16 Safe Harbor provision, a small existing market of patients compared to what the market size will be once the program is fully operational. BrightCare NEPA will responsibly educate physicians, the medical community, the public, patients and caregivers, on the advantages of medical marijuana. BrightCare is ready to deploy resources to reach these underserved populations and will implement extensive educational efforts. When prevalence by population is compared with the number of patients currently taking advantage of this resource the upside market potential is significant. BrightCare NEPA’s team of sales and marketing professionals along with their medical staff will lead the way in getting key opinion leaders to adopt medical marijuana as a valid option for their patients.

In an effort to ensure that patients and physicians are educated on the appropriate use of this new resource even in isolated rural communities BrightCare NEPA will implement a pharmaceutical marketing strategy created in partnership with the University of the Sciences. This strategy is aimed at increasing awareness and access to medical marijuana in these rural communities while also providing for access support specialists to help patients and physicians identify medical marijuana resources. BrightCare NEPA has located dispensaries in both rural and urban areas and each has been located where patients can utilize public transportation and BrightCare has also developed partnerships with community organizations to reach these rural patients. In fact, in one instance, BrightCare NEPA has retained the services of a long time local pharmacist in rural community in order to gain quick adoption by local patients suffering with serious medical conditions and in another, they located the dispensary in the regional shopping mall next to a Rite Aid and on the most heavily traveled route. BrightCare NEPA is committed to providing medication to patients regardless if they live in a rural community, are poor, disabled or elderly.

The Dispensary Experience
Our “Patient First” approach to the dispensary will differentiate BrightCare NEPA from our competitors and create an overall experience that is comfortable and familiar while being medically focused. By ensuring staff are educated on all product offerings, strains, CBD/THC content and routes of administration under the direction of highly skilled pharmacists and physicians BrightCare will be the top dispensary service provider in the Commonwealth. Through on-going staff training and collaboration with our network of contracted grower/processors BrightCare will be able to make appropriate product recommendations. In addition, Product Information Cards (PIC's) will be created and supplied to patients with an overview of the product THC/CBD content and educational information regarding the grow and processing techniques used in the development of each preparation. These information cards will provide easily understood overviews and will be produced in collaboration with University of the Sciences. PIC's will familiarize patients with the medications they are using and give them additional information they can share with their health care providers regarding the particular cannabis treatments they are using. Through a unique and exclusive collaboration with University of Sciences, BrightCare NEPA will have a fully functional pharmacy service model, this model will address pharmacist integration in medication recommendation, tracking functional and clinical outcomes, quality improvement, self-management support and appropriate health care provider integration.

Supply Chain

BrightCare NEPA has spent considerable time studying dispensaries in other jurisdictions in order to avoid any growing pains here in Pennsylvania. BrightCare has identified an issue in other jurisdictions were some dispensaries experience supply chain issues and sometimes run out of products. To avoid supply chain and product supply issues often seen in dispensaries throughout the country, BrightCare will use its extensive logistics, procurement and health system contracting experience to gain inventory par commitment levels and regular contracted inventory replenishments along with specialized ordering procedures. Inventory par levels will be electronically controlled by customer management and inventory software management systems to allow seamless procurement of medications. BrightCare does not anticipate supply chain issues but it has already developed relationship with six different G/P applicants.

Conclusion

BrightCare NEPA was formed by Samantha Edwards who has assembled a group of woman and business professionals with significant experience as entrepreneurs and healthcare providers for the purpose of applying for a medical marijuana dispensary license in the Northeast Health Regions of Pennsylvania. As evidenced above, many members of our Executive Board and Professional Team are deeply rooted in Pennsylvania communities. Our strong local ties lend to the nature and extent of our collective involvement in local charitable organizations, non-profits, and other organizations benefiting the community. BrightCare NEPA is committed to supporting its communities through a variety of means, including local hiring policy, free educational outreach, low-income patient subsidies, strategic investments in local municipalities and community-based organizations (similar to Host Community
Agreements our affiliates have executed elsewhere).

BrightCare NEPA is 100% women owned and 51% LGBTQ owned and its management team includes many other diverse groups, including Asian, Indian, African American, Latinos, disabled veterans, and religious minorities, among others. BrightCare NEPA is an equal opportunity employer and will always engage or employ the highest quality applicants regardless of race, color, creed, religion, sex, gender identity, sexual orientation, disability, age, socioeconomic status, or national origin. BrightCare believes creating and promoting a diverse company is vital to facilitating innovation and strong corporate culture and promoting a safe and happy workplace. Notably, our affiliates have hired diverse staff in every state where we operate and will continue this policy in Pennsylvania. BrightCare NEPA believes it’s make-up qualifies them as a “Diverse Group” as defined by Act 16 and is in the process of being certified by a Pennsylvania approved third-party certifying organization. Certifications will be provided to the Department of Health once received.

### SECTION 20 – CURRENT OFFICERS

Provide the position, title in the applicant’s business, and address information for all current officers, directors, partners or trustees.

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<th>Name and Residential Address</th>
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<tr>
<td>First Name: Josephine</td>
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<td>First Name: Giro</td>
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*Pennsylvania Department of Health*

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

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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.
## Pennsylvania Department of Health
### Medical Marijuana Dispensary Permit Application

**Complete the appropriate section(s) below:**

### A. For C-corporations, S-corporations, LLCs and LLLCs

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<tr>
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<tr>
<td><strong>Occupation:</strong> Media Specialist, Parkland School District</td>
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<tr>
<td><strong>Also known as:</strong> Sam</td>
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| First Name: | Diane | Middle Name: | | Last Name: Molewski | | Suffix: |
| Occupation: | Houswife | Title in the applicant’s business: | Principal/Financial Backer |
| Also known as: | | Date of birth: | DOH REDACTED |
| Address Line 1: | DOH REDACTED | Address Line 2: | |
| Address Line 3: | | City: | DOH REDACTED |
| | | State: | |
| | | Zip Code: | 18104 |
| Phone: | DOH REDACTED | Fax: N/A | |
| | | Email: | DOH REDACTED |
| Stock type or class: Series A Membership Units | Number of shares held: 16.34% | Date Acquired: 02/14/2017 | Percentage of outstanding voting stock: 16.34% | Terms, conditions, rights and privileges: DOH REDACTED |

### Name and Residential Address

| First Name: | Dona | Middle Name: Elizabeth | | Last Name: Hall | | Suffix: |
| Occupation: | Occupational Therapist | Title in the applicant’s business: Clinical Specialist/Financial Backer |
| Also known as: | | Date of birth: | DOH REDACTED |
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Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

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For Partnerships and LLPs

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Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

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Name and Residential Address

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# Pennsylvania Department of Health

## Medical Marijuana Dispensary Permit Application

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Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

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## Medical Marijuana Dispensary Permit Application

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#### Medical Marijuana Dispensary Permit Application

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If more space is required, please submit additional information on other partners in a separate document titled “Interest of Other Partners (Cont’d.)” in accordance with the attachment file name format requirements and include it with the attachments.

### 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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<tr>
<td>Korstein Realty (contact: David Koral)</td>
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Nature, type, terms and conditions of the interest in the applicant:

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<tbody>
<tr>
<td>Bruce</td>
<td></td>
<td>Vajda</td>
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**Occupation:** retired (property owner)  
**Title in the applicant’s business:** N/A

**Also known as:**

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**Address Line 2:**

**Address Line 3:**

**City:**

**State:**

**Zip Code:**

**Phone:** DOH REDACTED  
**Fax:**

**Email:** DOH REDACTED

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<tbody>
<tr>
<td>Cheryl</td>
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<td>Lazorack</td>
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**Occupation:** Educator/General Contractor (property owners)  
**Title in the applicant’s business:** N/A

**Also known as:**

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[Footer: Pennsylvania Department of Health]
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**Section 22 – Capital Requirements**

Provide a summary of your available capital and an estimated spending plan to be used for you to become operational within six months from the date of issuance of the permit:
Part F – Community Impact
(Scoring Method: 100 Points)

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:

BrightCare NEPA, LLC is a LGBTQ owned company that promises to be a reputable corporate entity with a focus on hiring diverse individuals, providing generous charitable engagement and will be a good neighbor to its host community. BrightCare NEPA consists of talented and caring Pennsylvanian's who have been engaged with their communities for many years. These highly successful individuals have given generously of their time, talents and wealth.
BrightCare NEPA has spent the last year traveling throughout Northeastern and North Central Pennsylvania to discuss their business plan and collect feedback on implementation, outreach, community needs and educational opportunities within the communities it plans to operate. Below is a synopsis of these meeting and the associated relationships our organization has formed:

**University and Educational Partnerships:**

President of King’s College, Father Jack Ryan- Father Ryan supports the project and provided a letter of support. He is pleased with the opportunity and impact for Kings students to have exposure to experiential learning activities.

King’s College Vice President for Institutional Advancement Fredrick Pettit, Esquire- Frederick supports the project and supplied a letter of support on behalf of the University.

Dr. Paul Katz, M.D., President University of Science- Dr. Katz provided a letter of support as the University has entered into an exclusive educational and research partnership with the organization.

Bloomsburg University- Our organization has a formal LOI with Bloomsburg University to allow for various experiential learning activities.

**Advocacy Groups**

Epilepsy Foundation Eastern Pennsylvania- Our organization has received a letter of support from the Epilepsy Foundation Eastern Pennsylvania (EFAPA) and will provide EFAPA clients with resources, education and medications.

Pediatric Cancer Foundation of LHV- Our organization has received a letter of support from the Pediatric Cancer Foundation of the Lehigh Valley which is partnering with the organization to provide resources to children battling cancer and the families that support them.

Bradbury-Sullivan LGBT Community Center of the Lehigh Valley- We are also partnering with the Bradbury-Sullivan LGBT Community Center. This partnership is based on education, community outreach and coordinated efforts to raise funds specific to the unique needs of the LGBT community. Founder/Executive Director Adrian Shanker provided BrightCare NEPA with a strong letter of support.

**BrightCare NEPA Leadership Team**

Josephine S. Vitale, the CEO is a prolific donor to charitable organizations, including the Four Diamonds Foundation, Paralyzed Veterans of America, The Marine Corps Foundation, The Luzerne Foundation, and the American Foundation for Suicide Prevention. Josie has a passion for the Ironman Triathlon and gives generously to the Ironman Foundation as well as the IM
Able Foundation. These Foundations provide grants, resources, fitness opportunities and motivation to disabled individuals who want to participate in triathlons, mostly former military veterans who lost limbs in combat. Specifically, they often provide funding for the special cycles and equipment for these disabled veterans to do triathlons. Josie also believes in supporting women’s health initiatives and frequently contributes to multiple charities supporting women’s healthcare. Josie participated for many years in the YWCA of Harrisburg’s “Pursuit of Justice” Auction, an annual purse auction benefitting free legal services for women leaving abusive relationships. Josie enjoys mentoring young women in the biotechnology sector and throughout her career has served in leadership roles in women’s leadership and development programs at Medtronic, GlaxoSmithKline, Johnson & Johnson and in her current role with a Silicon Valley start-up. Josie became ferociously committed to bringing her extensive experience in pharmaceuticals and biotechnology to the Pennsylvania Medical Marijuana program after losing her sister-in-law Angela to suicide last year.

Samantha A. Edwards, will bring her 15 years of teaching experience to BrightCare NEPA, LLC and serve as the Patient Education Manager, a role she was born to do. Sam, a certified Principle with several educational Masters Degrees, takes every opportunity to motivate her young students in a way that can only be described as inspirational. Sam has made it her personal mission to provide a safe and secure learning environment for her students, free from bullying and she is certified in Bullying Prevention, Diversity and Inclusion. As a young girl, Sam was injured in a life-threatening accident fracturing her pelvis and causing such massive internal trauma that physicians believed she would never walk again. With her innate perseverance and strong work ethic, Sam pushed herself against all odds to become a tremendous athlete in multiple sports both in High School and College. She has spent her life volunteering in ways to help and protect children and encourage them to succeed against all odds, just as she did.

Sam is a member of the Board of Trustees of the Hillside School where she serves on the Marketing & Enrollment and Strategic Visioning & Development Committees. The Hillside School is a school for students in kindergarten through 8th grade with language-based learning disabilities, such as dyslexia, dysgraphia and dyscalculia, as well as other disabilities that affect learning, including auditory and visual processing disorders, working memory deficits, ADHD and sensory processing disorders. Sam grew up in Hamlin, Wayne County in Northeastern Pennsylvania, an area not known for being progressive. As a gay young woman, her experiences have led her to be an active volunteer and donor to the Pennsylvania Diversity Network and the Human Rights Campaign. Sam cares deeply for children and frequently volunteers and contributes to St. Jude’s Children's Hospital, the American Cancer Society and the Pediatric Cancer Foundation of the Lehigh Valley. Sam also volunteers her time to programs that benefit children with disabilities, as well as offering her time and talents to the LGBTQI community. She resides in the Lehigh Valley with her wife and two sons.

Mike and Diane Molewski, owners and financial backers of BrightCare NEPA, are philanthropic giants in their community. They spend most of their free time serving others through their work promoting children's causes through access to higher education, pediatric healthcare and supporting nearly every charity imaginable. A common thread among the BrightCare NEPA team is the work ethic they developed as a result of growing up in poverty
and working from an early age. Their difficult beginnings have shaped each individuals’ passion for striving to make the most impact on their communities. Mike is a graduate of King’s College in Wilkes Barre and credits the opportunity and education he received there to his success in business and as a result has spent years giving back to the College. Mike currently sits on the King’s College Board of Directors, the McGowan School of Business Advisory Board, and previously served as Chair of the Fundraising and Institutional Advancement Committee where he led efforts to raise over $60 million dollars. Mike is also Vice Chairman of the Board at Northampton Community College Foundation, one of the largest community college foundations in the country with over $45 million raised. Over the past several years Mike has spearheaded the Foundation’s efforts to raise at least $2.5 million per year. Not to be outdone, Diane chairs the United Way, Alexis de Tocqueville Society, the Lehigh Valley Wine Auction & Gala, and the Lehigh Valley Food & Wine Festival. Her efforts have raised over $4 million dollars to benefit local children’s charities such as the Children's Home of Easton over the past ten years. Mike and Diane are both active members of the Pennsylvania Society and have made the lives of countless children, young adults and victims of abuse better through their efforts. They will only continue to do more of this work as leaders of BrightCare NEPA. They are a true team in life, the high school sweethearts have been married for 33 years and they continue to lead by example.

Reverend Katie Day, Ph.D., will serve as the BrightCare NEPA, LLC, Community/Patient Outreach Coordinator. Reverend Day brings her unique prospective to the BrightCare NEPA team. She is ordained in the Presbyterian Church U.S.A. and is a Charles A. Schieren Professor of Church and Society at the Lutheran Theological Seminary at Philadelphia where she has served on the faculty since 1985. Reverend Day has published four books, the most recent being a study of urban religion, *Faith on the Avenue: Religion on a City Street* (Oxford University Press, 2014). She has traveled the world to conduct research and speak on her studies. Reverend Day was a founding member of the Global Network for Public Theology and has conducted extensive research on urban religion as well as major studies of faith-based community organizing, Black Church arsons and the volunteer efforts to rebuild them, religious responses to HIV/AIDS in South Africa, and religious social service agencies. Reverend Day recently concluded her research on “God and Guns,” looking at the role of religion in the construction of meaning and public discourse on guns. She is also a National Board Chair of Heeding God’s Call, a faith-based movement to prevent gun violence. Reverend Day is a tremendous resource with extensive experience in community outreach and organizing.

Alan Paynter, BrightCare NEPA’s Chief Diversity and Inclusion Officer, has made a life out of doing more for others. Alan has been working with youth and families for over 20 years. He has made his passion his career. Alan is a Director of Admissions in a highly selective liberal arts college in Pennsylvania and he travels up and down the east coast speaking to students and families about the extraordinary opportunities available to them in a good college education. Alan’s guiding principle is serving underrepresented and underserved students in the process of pursuing higher education. He spearheads the college’s diversity recruitment efforts and his desire to guide these students emerges from his own background. He is the grandson and was raised by the late civil rights activist Ethel R. Lawrence who was responsible for what became known as the landmark NJ Supreme Court Mt. Laurel Decision which called for fair housing. She has been referred to nationally as the “Rosa Parks of affordable housing.” Her work for
fairness and equality for those less fortunate was something that Alan did not shy away from. Alan is the product of a tough youth; his mother was a single parent who did not finish high school and eventually attempted to take her own life due to the pressures of trying to raise 3 sons with very few resources. In addition, Alan and his wife have been relief house parents at the Milton Hershey School in Hershey for the past 15 years. The Milton Hershey School was created for orphans but today the school provides residential housing and education for the poor and students from broken homes. Alan also founded Hershey Blaze Track Club four years ago because he saw a lack of youth sports opportunities. These track clubs serve over 300 youth athletes and operate in two locations, Hershey and King of Prussia. Alan understands that track and field and cross country are great sports for youth with autism or intellectually disabilities. The Blaze coaches and club have accepted special needs athletes with open arms. Alan is a 20+ year member of Iota Phi Theta Fraternity, Inc., Victor Lodge #73 Prince Hall Masonic Lodge in Reading, Pa. and served on the board of directors of Camp Fire USA Adahi Council in Berks County.

**Partnerships**

BrightCare NEPA has received the support of the Epilepsy Foundation Eastern Pennsylvania and will provide EFEPA clients with resources, education and medications. BrightCare NEPA will have access through procurement contracts to a product specifically used to treat intractable epilepsy in children, and BrightCare NEPA will be the sole supplier of this product in Pennsylvania. EFEPA serves individuals and families affected by epilepsy/seizure disorders in the Philadelphia, Allentown, Wilkes-Barre, Scranton, and Lancaster area. EFEPA serves 18 counties where, based on average epilepsy prevalence estimates over 110,000 patients may be in need of resources. Allison McCartin the President and CEO of the Foundation has written a letter supporting BrightCare NEPA application for a dispensary permit.

Bloomsburg University of Pennsylvania is an educational partner of BrightCare NEPA. The company has entered into an agreement with the University to collaborate with University staff on specific learning plans that meet the needs of both Bloomsburg students as well as BrightCare NEPA commercial and research strategies. This exclusive agreement will allow students to gain exposure in this cutting edge and rapidly growing industry. BrightCare NEPA will provide students with academic internships, experiential learning and job shadowing. BrightCare NEPA values diversity and will provide economically disadvantaged students with paid internships or stipends based on student need.

King’s College is an educational and research partner of BrightCare NEPA. BrightCare NEPA has received the endorsement of Father Jack Ryan, President of King’s College, and the King’s College Community. Father Ryan wrote, “I know the founding partners of this company personally, one of which is a long-standing board member of the college, and I can attest to their high character, morals, faith, and commitment to their communities.” BrightCare NEPA and King’s College have formed an academic partnership where students will have experiential learning opportunities, research survey data analysis, and BrightCare will integrate students into
executive workforce training roles with the goal of developing the industry leaders of tomorrow.

The University of Sciences, formerly the Philadelphia School of Pharmacy, is an educational, research, and strategic partner of BrightCare NEPA. BrightCare entered into an exclusive partnership with the University. The University will provide on-going multi-specialty expertise in pharmaceutics, medical technical writing, pharmacy modeling and outcomes research. This collaboration will allow BrightCare NEPA to provide experiential learning opportunities and research collaboration to gain access to the exceptionally talented pool of students for academic internships and job shadowing. BrightCare values diversity and will provide economically disadvantaged students with paid internships or stipends based on need.

As a woman and lesbian owned company, BrightCare NEPA is partnering with the Bradbury-Sullivan LGBT Community Center of the Lehigh Valley. This partnership is based on education, community outreach and coordinated efforts to raise funds. The Bradbury-Sullivan LGBT Community Center was created in 2014 out of a restructuring of the Pennsylvania Diversity Network, which was formed in 2004 by Allentown residents and LGBT community leaders, Liz Bradbury and Patricia Sullivan. Liz and Trish's dedication and leadership over many years made Allentown, and the Lehigh Valley, a place where the LGBT community had a strong voice. They co-founded the PA Gay and Lesbian Alliance for Political Action, which for 10 years was Pennsylvania's pre-eminent LGBT political organization. They led the effort to pass the expansion of Allentown's non-discrimination law to include the LGBT community (and then led the fight to prevent its repeal), and subsequently helped pass similar laws in Easton, Reading and Bethlehem. The Bradbury-Sullivan LGBT Community Center provides arts & culture, health promotion, and youth programs as well as supportive services and a Training Institute to support the LGBT community in the Greater Lehigh Valley. In April 2016, the Bradbury-Sullivan LGBT Community Center, under the leadership of the Founder/Executive Director Adrian Shanker, realized its vision for an LGBT community center to serve the vibrant, and growing, LGBT community in the Lehigh Valley. With tremendous community support, they were able to grow the organization and purchase the building they now call home.

Gaining the support of Adrian Shanker is important to BrightCare NEPA because he has been a leader in the advocacy efforts of the LGBT community for over ten years and he has paid specific attention to the intersection of LGBT advocacy and health equity. Prior to founding the Bradbury-Sullivan LGBT Community Center, Adrian served as President of Equality Pennsylvania where he led successful campaigns to advance non-discrimination and relationship recognition ordinances in municipalities across Pennsylvania. He also served a three-year term on the Human Relations Commission of the City of Allentown. In addition to his leadership at The Center, Adrian serves on the Pennsylvania Department of Health's Office of Health Equity Advisory Board, as co-chair of LGBT Healthlink's Community Advisory Committee, on The ACLU of Pennsylvania's Board of Directors, and Pennsylvania Medical Society's LGBT Health Disparities Task Force. BrightCare looks forward to engaging with this
group in an effort to better serve the LGBTQ community.

**Support from Local Municipalities and Municipal Officials:**

**Plymouth Borough**- This local community has strongly supported the scope and expertise of the project and its corporate team.

**Plymouth Mayor**- The Mayor has strongly supported the scope and expertise of the project and its corporate team.

**Plymouth Borough Council President**- The Council President quickly added his support for the BrightCare dispensary in NEPA.

**Laurel Run Mayor**- This local community has strongly supported the scope and expertise of the project and its corporate team.

**Laurel Run Borough Council President**- After losing her mother to cancer last year this local leader believes in the organization’s ability to make a positive impact in the Medical Marijuana program.

**Hellertown Borough Council**- This borough supports BrightCare and provided a letter of recommendation.

**Tom Leighton, Former Mayor of Wilkes Barre**- Tom has known several of the founding partners for many years and, he met with the team to learn more about the business plan and our project scope.

**Support from State Public Officials:**

**Members of PA Senate**

**John Yudichak**- Met with the Senator and his team and had multiple conversations to provide plan feedback and influence regarding specific needs of the communities he serves.

**John Blake**– Met with the Senator and his staff to discuss the scope and plan of the project roll out, specifically complex care delivery models and the impact post-market outcomes surveys may have on the body of evidence for Medical Marijuana

**Lisa Baker**- Met with Senator Lisa Baker to discuss the scope and plan for the project. She had particular interest in the impact of having access in both rural and urban communities as well as the ability to track patient response to therapies.

**John Gordner**- Presented to the Senator on the scope and proposed economic impact of the project, specifically on ensuring access to special populations and adhering to program
Members of PA House of Representatives

Gerald Mullery – Met with the Representative on multiple occasions regarding full scope of project as well as specific economic impact through job creation.

Eddie Day Pashinski – Met with the Representative on several occasions to keep him appraised of the progress of project development and worked through him to address and provide education to the community on full project scope.

Thomas Caltigiron – Met with Representative Caltigiron to discuss the issues specifically facing constituents and also how the local leadership of the team would benefit his district and Pennsylvania as a whole.

Mark Rozzi – Met with Representative Rozzi to discuss the health care landscape in Berks County and what needs could be met through our proposed project.

Kurt Masser – Met with the Representative to discuss his community, which is centrally focused around Geisinger Health System. Further discussion included potential survey based research opportunities developed within our project scope and the importance of those research components.

Sid Michaels Kavulich – Met with Representative Kavulich to discuss heath care concerns in his district in Lackawanna County and specifically discussed constituents who he knew could be helped by the development and access to this medication in and around his district.

Doyle Heffley – Met with Representative Heffley to discuss the unique needs of Carbon County given its physical location and how his community may benefit from both a health care and economic standpoint.

Garth Everett – Met with Representative Everett to discuss the specific location of the project and potential health care partnerships that may exist within his district moving forward.

Jonathan Fritz – Met with Representative Fritz to explain the scope of the project and to discuss rural health care needs especially in relation to the heroin crisis in Susquehanna and Wayne County.

David Millard – Met with Representative Millard to discuss his community in Columbia County. He had a specific focus on veterans and we further discussed the incorporation of veterans on our team as well as the focus on veterans within our business plan.

Jeff Wheeland – Met with Representative Wheeland to discuss health care specific issues facing Williamsport and the differences in access to health care between more urban and more rural
areas specifically related to the heroin crisis.

Michael Peifer– Met with Representative Peifer to discuss Pike County and how his district would be assisted both from an economic development and health care perspective.

Gary Day- met with Representative Day to provide an overview of the project and explain how the commercial strategy aligns to more traditional pharmaceutical products.

**Business Plan Development and More Detailed Stakeholder Input**

The BrightCare NEPA team also went on a listening tour throughout the Northeast Health Districts to receive input from local community leaders on where best to locate dispensaries and what issues are most important to their local communities.

The BrightCare NEPA team met with Senator John Blake to discuss locating a dispensary within his legislative district and where he would recommend it be located. Senator Blake was supportive of BrightCare NEPA’s business plan and welcomed potential dispensaries in his district. BrightCare NEPA secured a property in Dickson City on the Scranton-Carbondale Highway. Senator Blake also showed a particular interest in BrightCare NEPA’s approach to using clinical data to determine a patient’s specific medical marijuana needs. The Senator was impressed with BrightCare NEPA’s plan to fund research partnerships with educational institutions and health systems and the patient centric outcomes based commercial model.

BrightCare NEPA first met with Senator John Yudichak to discuss their business plan and strategy to develop a series of dispensaries in the Northeast that would be accessible to his constituents. Senator Yudichak was very supportive and enthusiastic about the fact that the founding partners of BrightCare NEPA are women and lesbians from Northeastern PA. The Senator expressed how proud he was with BrightCare’s vision to provide the most advanced medical marijuana products on the market at their dispensaries. Senator Yudichak asked BrightCare NEPA consider avenues to keep product prices down to allow for low and middle income patients to access medications. BrightCare NEPA has implemented a subsidy program to provide its products at free or reduced price based on need.

The BrightCare NEPA team met with Senator Lisa Baker. Senator Baker was pleased with the patient centric outcomes based approach of the BrightCare NEPA’s business plan and commercial strategy. During the conversation, they discussed ensuring care access to both urban and rural patients while being cost conscience. She also shared her thoughts on the specific challenges women face while accessing health care. She was enthusiastic about the
focus on utilizing patient surveys to create a basis for outcomes research on post market products. Senator Baker was interested to learn that BrightCare NEPA is placing a dispensary in Hamlin, Wayne County to address the care access challenges often faced by patients living in rural or isolated Northeastern Pennsylvania communities.

BrightCare NEPA met with Representatives Mark Rozzi and Tom Caltigirone, members of the Northeast Delegation. Both Members were impressed with the team and wrote a letter of support for BrightCare based on their unique ability to focus on patient outcomes, market development and care access strategies as well as a specific focus on continuous improvement with the most advanced security and anti-diversion personnel assembled strengthening the safety and security of the Pennsylvania communities the organization will service. The BrightCare commitment to public safety, security and anti-diversion protocols is demonstrated by the leadership of Vince Canales who has dedicated his life to public service as a law enforcement officer.

BrightCare NEPA met with Representatives Gary Day, quick to admit that he voted against SB 3 and felt there was a lack of evidence supporting the use medical marijuana. After a lengthy and spirited discussion, Rep. Day thanked the BrightCare team for providing all the information, and discussing the group’s specific plans to operate much like a specialty pharmacy.

Hellertown Borough Council President Thomas Rieger, expressed his support for BrightCare NEPA’s dispensary in the Borough. He also explained why Council believes a Main Street, Hellertown dispensary is an optimal location. President Rieger pointed out that the dispensary will have direct access to Interstate 78, it’s located on a public transit route near many health-related facilities and being within a mixed-use urban area allows for the maximization of access to the greatest number of patients. BrightCare NEPA made the decision to locate one of its dispensaries in Hellertown over several other locations based partly on the quick support it received from the officials in Hellertown.

**Conclusion**

BrightCare NEPA has made it our mission to make sure patients with serious medical conditions have access to medical marijuana products regardless if they are poor, elderly or disabled. BrightCare NEPA will implement a low-income subsidy program to offer registered qualifying patients with verified financial hardship subsidized access to products and services.
on a sliding scale basis determined by need (potentially up to 100% off of retail prices). To qualify for hardship subsidies, a patient completes a simple subsidy request form and submits proof of hardship, such as pay stubs, recent tax returns or SSI letters, which will be reviewed by dispensary management who will ultimately decide the appropriate level of discount. Qualifying patients will renew their participation in the hardship program on an annual basis. BrightCare takes patient access to medical marijuana very seriously and provides discounts on equipment needed to administer medications as well. In recognition of the diverse qualifying conditions, some of which are best addressed using vaporization as a means of administration, BrightCare will offer discounts and/or deferred payment plans for hardship program participants to purchase vaporizer equipment. Such equipment can be relatively expensive for the highest quality products, so we will take steps to assure affordability and access to these preferred medical devices.

BrightCare NEPA is committed to creating up to 20 high paying family sustaining jobs with healthcare benefits and a 401k at each of our dispensary locations. BrightCare NEPA employees will have access to financial and retirement planning service. BrightCare NEPA believes our strength is our employees and will leverage its relationship within the financial management industry to provide resources to our employees to save for a sound retirement. BrightCare financial backer Mike Molewski’s financial services firm specializes in providing retirement solutions. Although many of his firm’s clients have significant wealth, the average income for workers managed in his firm’s retirement services funds is $30,000 a year and many are hourly workers and laborers. BrightCare NEPA is pleased that through Mike’s expertise we will be able to provide BrightCare NEPA employees with a stable financial future.

BrightCare NEPA’s dispensaries will be presented as a highly professional specialty pharmacy where patients will feel comfortable, safe and secure. BrightCare NEPA will exceed the security requirements of Act 16 of 2016 and will utilize the most advanced technology to track products from seed to sale as well as employ high level individuals from the local law enforcement community.

Based on recommendation of local stakeholders BrightCare NEPA has targeted local communities with an urgent need for new business investment and economic development. In an effort to address the care desert in rural communities created by the financial, socioeconomic and transportation challenges affecting patients in isolated rural areas BrightCare NEPA has identified target specific dispensary location in areas that are rural but also easily accessible for all patients in the region. In allowing consumers to obtain medications in their own communities BrightCare NEPA can reduce the financial burden these individuals often experience when accessing specialized care.

BrightCare NEPA’s team includes several former medical device and pharmaceutical sales
professionals with experience in the local markets our dispensary will serve. Based on their existing physician relationships and unique understanding of how patients and physicians incorporate new treatment algorithms these professionals will be able to quickly identify barriers to use and allow more patients access to these new therapeutic options. In fact, Dr. Pryblick, a member of BrightCare NEPA has served as President of her local medical society and as an officer in the PA Medical Society. In addition, BrightCare has engaged one of the region’s top pain management specialists Dr. Farooq Qureshi as Medical Officer to study and create a model for physicians to incorporate cannabis for patients struggling with chronic pain syndrome.

BrightCare NEPA has partnered with a national medical marijuana company who has its own brand name proprietary products with proven success and will be able to immediately deploy those products and experience in BrightCare NEPA dispensaries. Based on specific feedback BrightCare NEPA received on its listening tour, it has developed marketing and patient education plans which are specific to each community served by one of its dispensaries. As a woman and LGBT owned company, BrightCare NEPA cares deeply about special vulnerable populations. BrightCare NEPA, though its outreach, has identified organizations to collaborate with in identifying and implementing specific measures to educate and ensure patients access regardless of ability to pay.
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

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.

[ ] Yes  [ ] No

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:

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<thead>
<tr>
<th>File Name</th>
<th>Name of Document</th>
<th>Purpose</th>
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<tbody>
<tr>
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<td>Principals, Financial Backers and Operators (contd.)</td>
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<td>Operators (contd.)</td>
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<tr>
<td>BrightCare NEPA LLC_03200217_Dispensary_Letters from Community Leaders</td>
<td>Letters from Community Leaders</td>
<td>Additional Information</td>
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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**

Diane Molewski

**Title in Applicant’s Business**

Principal

**Date**

3/16/17

**Printed Name**

Diane Molewski

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**

Diane Molewski

**Title in Applicant’s Business**

Principal

**Date**

3/16/17

**Printed Name**

Diane Molewski
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).

Diane Molenski  Principal  3/1/17
Signature  Title in Applicant's Business  Date

Diane Molenski
Printed Name

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
### Attachment B: Organizational Documents

**Instructions:**
- Attach certified copies of the applicant's certificate of incorporation, partnership agreement, charter or other such documentation. If the applicant is not organized in Pennsylvania, attach Business Name, as it appears on the applicant's certificate of incorporation, charter, bylaws, partnership agreement or other legal business formation documents:

<table>
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**Trade names and DBA (doing business as) names:**
N/A

**Principal Business Address:**
425 Spruce Street Ste. 200

<table>
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<tr>
<th>City: Scranton</th>
<th>State: PA</th>
<th>Zip Code: 18501</th>
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<tr>
<td>Phone: 570-762-9725</td>
<td>Fax: N/A</td>
<td>Email: <a href="mailto:brightcarenepa@gmail.com">brightcarenepa@gmail.com</a></td>
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[Logo: Pennsylvania Department of Health]
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
02/20/2017

TO ALL WHOM THESE PRESENTS SHALL COME, GREETING:

BrightCare NEPA, LLC

I, Pedro A. Cortés, Secretary of the Commonwealth of Pennsylvania, do hereby certify that the foregoing and annexed is a true and correct copy of

Creation Filing filed on Feb 14, 2017 - Pages (2)

which appear of record in this department.

IN TESTIMONY WHEREOF, I have hereunto set my hand and caused the Seal of the Secretary's Office to be affixed, the day and year above written

Pedro A. Cortés
Secretary of the Commonwealth

Certification Number: TSC170220100064-1
Verify this certificate online at http://www.corporations.pa.gov/orders/verify.aspx
Certificate of Organization
Domestic Limited Liability Company
DSCB:15-8913 (rev. 7/2015)

TFA170214JF0802

Fee: $125

In compliance with the requirements of 15 Pa.C.S. § 8913 (relating to certificate of organization), the undersigned desiring to organize a limited liability company, hereby certifies that:

1. The name of the limited liability company (designator is required, i.e., "company", "limited" or "limited liability company" or abbreviation):

BrightCare NEPA, LLC

2. The (a) address of the limited liability company’s initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:

(a) Number and Street City State Zip County

425 Spruce St, Suite 200 Scranton PA 18503 Lackawanna

(b) Name of Commercial Registered Office Provider County

c/o:

3. The name and address, including street and number, if any, of each organizer is (all organizers must sign on page 2):

Name

Samantha A. Edwards

Address

DOH REDACTION
4. Strike out if inapplicable term
   A member's interest in the company is to be evidenced by a certificate of membership interest.

5. Strike out if inapplicable:
   Management of the company is vested in a manager or managers.

6. The specified effective date, if any is: ________________
   (MM/DD/YYYY and hour, if any)

7. Strike out if inapplicable:
   The company is a restricted professional company organized to render the following restricted professional service(s):
   ___________________________________
   ___________________________________
   ___________________________________

8. For additional provisions of the certificate, if any, attach an 8 1/2 x 11 sheet.

IN TESTIMONY WHEREOF, the organizer(s) has (have) signed this Certificate of Organization this
31 day of January 2017

[Signature]

[Signature]

[Signature]
Attachment C: Property Title, Lease, or Option to Acquire Property Location

Instructions:
- Attach one of the following:
  - Evidence of the applicant's clear legal title to or option to purchase the proposed site and facility
  - A fully-executed copy of the applicant's

<table>
<thead>
<tr>
<th>Business Name, as it appears on the applicant's certificate of incorporation, charter, bylaws, partnership agreement or other official documents:</th>
</tr>
</thead>
<tbody>
<tr>
<td>BrightCare NEPA LLC</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Trade names and DBA (doing business as) names:</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Principal Business Address: 425 Spruce Street Ste. 200</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>City: Scranton</th>
<th>State: PA</th>
<th>Zip Code: 18501</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phone: 570-762-9725</td>
<td>Fax: N/A</td>
<td>Email: <a href="mailto:brightcarenepa@gmail.com">brightcarenepa@gmail.com</a></td>
</tr>
</tbody>
</table>

pennsylvania
DEPARTMENT OF HEALTH
LEASE AGREEMENT

PARTIES

THIS AGREEMENT MADE THIS fifteenth day of March 2017 by and between Charles S. Trace, hereinafter referred to as “Landlord” and BrightCare NEPA, LLC hereafter “Tenant.”

PREMISES

Landlord does hereby demise and let unto Tenant and Tenant herein agrees to let from Landlord the leasehold premises located at 1160 Main Street, Hellertown Borough, County of Northampton, Commonwealth of Pennsylvania 18055-1360.

TERM

The term of this agreement shall commence on March 1, 2017, and end when Tenant is awarded or denied a license under Act 16 of 2016 (the Medical Marijuana Act). Once Tenant is awarded a license to dispense medical marijuana, Tenant agrees to a five year lease with a five year renewal option.

RENT

In consideration thereof the Tenant agrees to pay as rent for the leasehold premises six hundred ($600.00) dollars a month for the initial contingent lease agreement term commencing on March 1, 2017. Once Tenant is awarded a license to dispense medical marijuana Tenant agrees to pay twelve hundred dollars ($1,200.00) per month. If Tenant is not awarded a medical marijuana dispensary license this lease is null and void.

PAYMENT OF RENT

The rent reserved and due shall be payable on the fifteenth calendar day of each month with a grace period of five (5) days after the first day of the month.

CONTINGENCY CLAUSE

This Lease and the obligations of each party hereunder are expressly contingent upon Tenant’s receipt of all necessary licenses, permits, support letters, or other approvals (hereinafter, “Tenant’s Approvals”) from the Commonwealth of Pennsylvania, the Borough of Hellertown, the County of Northampton, or any other governmental, quasi-governmental, or any other authority authorizing Tenant to operate as a medical marijuana dispensary organized for the purpose of dispensing medical marijuana in accordance with the requirements of Act 16 of 2016 (Pennsylvania Medical Marijuana Act). If at any time prior to being granted a license under Act 16 of 2016, Tenant determines in good faith that it will not receive Tenant’s Approvals or Tenant is denied the receipt of Tenant’s Approvals, Tenant shall notify Landlord of same and either party may terminate this Lease by written notice given to the other. Tenant agrees to use its commercially reasonable efforts to apply for and diligently pursue Tenant’s Approvals and to notify Landlord within five (5) days after all Tenant’s Approvals have been
awarded or otherwise given or denied to Tenant. Landlord shall provide Tenant access to the Leased Premises for the purpose of planning, estimates and bidding purposes. Landlord shall use its best efforts to cooperate with Tenant in its pursuit of all approvals.

REVERSIONARY RIGHT

Landlord retains the right to re-take possession of the leasehold premises herein described upon the expiration of the term of this lease agreement, or extended term thereof. All rights of enjoyment and possession held by Tenant are reverted to Landlord. Tenant shall have no further rights of entry and herein conveys, grants, assigns and delivers to the lessor all rights of enjoyment and rights of possession held by the lessee upon the expiration of the term of this lease agreement or any extended term thereof. Landlord acknowledges that its rights of reentry into the Premises set forth in this Lease do not confer on it the authority to manufacture and/or dispense on the Premises medical marijuana in accordance with the PA Medical Marijuana Act and agrees to provide the Commonwealth of PA Department of Health with notification of its intent to reenter the Premises or to initiate dispossess proceedings or that the Lease is due to expire, at least thirty (30) days prior to the date on which Landlord intends to exercise a right of reentry or to initiate such proceedings or at least 60 days before expiration of the Lease.

USE OF PREMISES

Only for the purpose of operating the dispensing location of the Tenant’s registered medical marijuana dispensary, or substantially similar or ancillary business, in accordance with all Commonwealth of Pennsylvania laws, rules and regulations, including but not limited to the Pennsylvania Medical Marijuana Act. In all instances the Tenant’s use of the premises shall be in accordance with all state and local laws. Tenant shall be responsible for determining and be responsible for compliance regarding all laws, regulations and codes (state and local), including, but not limited to regulations as to zoning and permitting for the intended use, building safety and fire codes, and architectural barriers. Landlord will use its best efforts to cooperate with Tenant pursuit of all necessary approvals, including at both the state and local level. Tenant shall hold Landlord harmless against any and all fines or penalties that may be imposed on Landlord as a result of Tenant’s breach of this provision, and shall be liable for Landlord’s costs and expenses, including attorney fees, incurred as a result of Tenant’s breach of this provision.

SAFEGUARD AGAINST REGULATED ASSET SEIZURE

Landlord and all other unauthorized parties are expressly and unequivocally prohibited from the seizure of any regulated assets lawfully possessed by Tenant or other authorized parties at the Demised Premises, particularly those regulated assets which may be authorized for such possession pursuant the Pennsylvania Medical Marijuana Act and its implementing regulations. To the extent any other terms of this Lease conflict with this clause the terms of this clause shall supersede and control.
OCCUPANCY PERMITS, LICENSES ECT.
Tenant shall be responsible, at Tenants expense, to obtain an occupancy permit from the local code enforcement department. In the event the Tenant creates a condition where he is in violation of the occupancy permit code/s, the Tenant, at Tenant’s sole cost, shall correct said issue/s and have the occupancy permit re-issued stating the occupancy permit is issued free and clear of any violations. The Tenant shall be responsible, at Tenant’s sole cost to obtain any and all licenses, permits, certificates, etc. from any and all governmental agencies to operate Tenant’s business activities on the leasehold premises as required by law.

LANDLORD’S MAINTENANCE
Landlord shall maintain, at Landlord’s sole cost, and keep in good condition the roof membrane, roof structure, bearing walls, building foundation, brick and masonry, and landscaping.

TENANT’S MAINTENANCE
Tenant shall maintain repair and or replace all items not covered by Landlord’s Maintenance clause of this lease agreement at the Tenant’s sole cost without setoff, deduction or reimbursement of any kind.

TENANT’S OBLIGATIONS
(a). Tenant shall make only such alterations, improvements, and additions or install any fixtures, whether installed before or after the execution of this lease agreement, necessary to operate a medical marijuana dispensary. Tenant shall seek prior written consent from the Landlord and the Landlord shall not unreasonably withhold such consent. (b). Tenant shall keep the demised property clean and in a safe condition and maintain such sanitation requirements required by regulations or governmental agency. (c). Tenant shall not cause to be done by any act, matter or thing to be done that would cause an environmental hazard or violate state or local laws or regulations, order or decrees to relating to the creation of an environmental hazard. Tenant shall conduct himself/herself, and all other persons on the demised property in a manner that will not disturb the peaceful enjoyment of others occupying the leasehold premises and those persons residing near or doing business near the demised premises. (d). Tenant shall comply with any and all future rules and regulations that may from time to time be adopted by Landlord in writing. Furnish to Landlord, in writing, any and all defects to the leasehold premises that are the responsibility of the Landlord under the terms and conditions of this lease agreement.

ENTRY BY LANDLORD
Tenant herein agrees to permit the Landlord, its agents, employees and persons authorized by Landlord to have access to the leasehold premises to make such repairs or alterations as may be necessary. The Landlord will not access the premises prior to obtaining Tenant’s permission before any access, and Landlord acknowledges that it may not access the premises without the Tenant or a designated agent or employee of the
Tenant’s is available to accompany them while they have access to the premises. Landlord acknowledges that his access to the premises may be limited to the extent required by the Pennsylvania Medical Marijuana Act. Landlord will not permit anyone under the age of 18 to access the premises on his behalf.

NOTICES & PAYMENTS
All notices required other than those specified hereunder shall be deemed sufficiently given if sent by certified mail, return receipt requested, addressed:

To Landlord:

To Tenant:
BrightCare NEPA, LLC
425 Spruce Street, Suite 200
Scranton, PA 18503

SIGNS
Tenant herein shall not erect any signs on the premises without first obtaining the consent of the Landlord, which consent Landlord agrees it will not arbitrarily or unreasonably withhold, and in the event such consent is obtained.

ALTERATIONS IMPROVEMENT
Landlord understands that Tenant will need to make alterations to the premises to comply with state law, including the installation of security surveillance equipment, a safe or vault, an awning to provide privacy during product transfers, and other improvements intended to make the property more suitable for a medical marijuana dispensary. The cost of such alterations and or improvements shall be at the sole cost of the Tenant. Landlord shall have the opportunity to approve or deny such alteration but will not unreasonably withhold such approvals.

FORCE MAJEURE
The parties shall not be required to perform any term, condition or covenant in this Lease so long as such performance is delayed or prevented by force majeure, which shall mean acts of God, labor disputes (whether lawful or not), material or labor shortages, restrictions by any governmental authority, civil riots, floods and any other cause not reasonably within the control of the parties and which by the exercise of due diligence the party is unable, wholly or in part, to prevent or overcome.

CHOICE OF FORUM
The Parties intend that this lease, and any disputes arising from it, shall be governed by the laws of the Commonwealth of Pennsylvania and shall be litigated in Northampton County Pennsylvania.
IN WITNESS THEREOF, THE PARTIES HERETO SET THEIR HANDS AND SEAL

THIS 1st DAY OF March 2017 A.D.

Accepted by Landlord: Charles Vajda Date: 3-10-17

Accepted by Tenant: Date: 3/10/17
ACKNOWLEDGMENT

I, _______ Charles B. Voyage _______, hereby acknowledge that the Tenant under this lease agreement intends to operate as a permitted medical marijuana dispensary in accordance with the requirements of Act 16 of 2016 (Pennsylvania Medical Marijuana Act) for the term of the lease, which exceeds the term of the Tenant’s initial permit, at the property I own and lease to them located at 1160 Main Street, Hellertown Borough, County of Northampton, Commonwealth of Pennsylvania 18055-1360.

Landlord: _______ Charles B. Voyage _______

Date: _______ 3-10-17 _______
ACKNOWLEDGMENT

I, David Koral, the authorized agent of Korstein Realty, hereby acknowledge that the Tenant under this lease agreement intends to operate as a permitted medical marijuana dispensary in accordance with the requirements of Act 16 of 2016 (Pennsylvania Medical Marijuana Act) for the term of the lease, which exceeds the term of the Tenant’s initial permit, at the property I own and lease to them located at The Fashion Mall, Route 6, Dickson City, Scranton, County of Lackawanna, Commonwealth of Pennsylvania 18508.

Landlord: [Signature] Date: 2/28/17
LEASE AGREEMENT

PARTIES

THIS AGREEMENT MADE THIS first day of March 2017 by and between Cheryl and John Lazorack, hereinafter referred to as “Landlord” and BrightCare NEPA, LLC having a business address at 425 Spruce Street, Suite 200, Scranton, Pennsylvania 18503 hereafter referred to as “Tenant.”

PREMISES

Landlord does hereby demise and let unto Tenant and Tenant herein agrees to let from Landlord the leasehold premises located at 588 Easton Turnpike, Hamlin, Salem Township, County of Wayne, Commonwealth of Pennsylvania 18427, being 2,000 +/- square feet.

TERM

The term of this agreement shall commence on March 1, 2017, and end when Tenant is awarded or denied a license under Act 16 of 2016 (the Medical Marijuana Act). Once Tenant is awarded a license, the Parties agree to negotiate a lease commencing on the day the PA Department of Health requires secondary dispensary locations to be operational.

RENT

In consideration thereof the Tenant agrees to pay as rent for the leasehold premises five hundred ($500.00) U.S. Dollars a month for the initial contingent lease agreement term commencing on March 1, 2017. If Tenant is not awarded a medical marijuana dispensary license this lease agreement is null and void.

TO RENEW

The lease agreement shall be renewed for an additional two (2) year term under the following conditions: The Parties affirmatively renew the lease agreement; At no time shall this lease be considered to be automatically renewed, at the expiration of this lease the lease shall become a month-to-month lease until either party renews or terminates such lease.

PAYMENT OF RENT

The rent reserved and due shall be payable on the first calendar day of each month with a grace period of five (5) days after the first day of the month.

CONTINGENCY CLAUSE

This Lease and the obligations of each party hereunder are expressly contingent upon Tenant’s receipt of all necessary licenses, permits, support letters, or other approvals (hereinafter, “Tenant’s Approvals”) from the Commonwealth of Pennsylvania, the Township of Salem, the County of Wayne, or any other governmental, quasi-governmental, or any other authority authorizing Tenant to operate as a medical marijuana dispensary organized for the purpose of dispensing medical marijuana in accordance with the requirements of Act 16 of 2016 (Pennsylvania Medical Marijuana Act). If at any time prior to being granted a license under Act 16 of 2016, Tenant determines in good faith that it will not receive Tenant’s Approvals or Tenant is denied the receipt of Tenant’s Approvals, Tenant shall notify Landlord of same and either party
may terminate this Lease by written notice given to the other. Tenant agrees to use its commercially reasonable efforts to apply for and diligently pursue Tenant’s Approvals and to notify Landlord within five (5) days after all Tenant’s Approvals have been awarded or otherwise given or denied to Tenant. Landlord shall provide Tenant access to the Leased Premises for the purpose of planning, estimates and bidding purposes. Landlord shall use its best efforts to cooperate with Tenant in its pursuit of all necessary approvals, including both at the state and local levels.

ASSIGN, AND SUB-LET
The Tenant shall not rent, assign, let or sub-let the leasehold premises, or any part thereof; nor transfer possession or occupancy thereof to any person, partnership, corporation or association; nor transfer, assign, mortgage or encumber this lease agreement without in each case first having obtained written consent of the Landlord. Tenant’s affiliated dispensary organizations shall be permitted to possess or occupy the premises.

SUCCESSOR AND ASSIGNS
All terms, provisions, covenants and conditions to be observed and performed by Tenant shall be applicable to and binding upon Tenant’s respective heirs, administrators, executors, successors and assigns, subject, however, to the restrictions as to assignment or subletting by Tenant as provided herein. All expressed covenants of this Lease shall be deemed to be covenants running with the land.

REVERSIONARY RIGHT
Landlord retains the right to re-take possession of the leasehold premises herein described upon the expiration of the term of this lease agreement, or extended term thereof. All rights of enjoyment and possession held by Tenant are reverted to Landlord. Tenant shall have no further rights of entry and herein conveys, grants, assigns and delivers to the lessor all rights of enjoyment and rights of possession held by the lessee upon the expiration of the term of this lease agreement or any extended term thereof. Landlord acknowledges that its rights of reentry into the Premises set forth in this Lease do not confer on it the authority to manufacture and/or dispense on the Premises medical marijuana in accordance with the Pennsylvania Medical Marijuana Act and agrees to provide the Commonwealth of Pennsylvania Department of Health with notification of its intent to reenter the Premises or to initiate dispossess proceedings or that the Lease is due to expire, at least thirty (30) days prior to the date on which Landlord intends to exercise a right of reentry or to initiate such proceedings or at least 60 days before expiration of the Lease.

USE OF PREMISES
Only for the purpose of operating the dispensing location of the Tenant’s registered medical marijuana dispensary, or substantially similar or ancillary business, in accordance with all Commonwealth of Pennsylvania laws, rules and regulations, including but not limited to the Pennsylvania Medical Marijuana Act. In all instances the Tenant’s use of the premises shall be in accordance with all state and local laws. Tenant shall be responsible for determining and be responsible for compliance regarding all laws, regulations and codes (state and local), including, but not limited to regulations as to zoning and permitting for the intended use, building safety and fire codes, and architectural barriers. Landlord will use its best efforts to cooperate with
Tenant pursuit of all necessary approvals, including at both the state and local level. Tenant shall hold Landlord harmless against any and all fines or penalties that may be imposed on Landlord as a result of Tenant’s breach of this provision, and shall be liable for Landlord’s costs and expenses, including attorney fees, incurred as a result of Tenant’s breach of this provision. In the event Tenant receives a notice of violation from any local, county, state or any other governmental unit or agency, Tenant must provide the notice of violation to Landlord within twenty four (24) hours and must cure the violation within the period required under the notice of violation or sixty (60) days whichever is shorter.

SAFEGUARD AGAINST REGULATED ASSET SEIZURE
Landlord and all other unauthorized parties are expressly and unequivocally prohibited from the seizure of any regulated assets lawfully possessed by Tenant or other authorized parties at the Demised Premises, particularly those regulated assets which may be authorized for such possession pursuant the Pennsylvania Medical Marijuana Act and its implementing regulations. To the extent any other terms of this Lease conflict with this clause the terms of this clause shall supersede and control.

OCCUPANCY PERMITS, LICENSES ECT.
Tenant shall be responsible, at Tenant’s expense, to obtain an occupancy permit from the local code enforcement department. In the event the Tenant creates a condition where he is in violation of the occupancy permit code/s, the Tenant, at Tenant’s sole cost, shall correct said issue/s and have the occupancy permit re-issued stating the occupancy permit is issued free and clear of any violations. The Tenant shall be responsible, at Tenant’s sole cost to obtain any and all licenses, permits, certificates, etc. from any and all governmental agencies to operate Tenant’s business activities on the leasehold premises as required by law.

LANDLORD’S MAINTENANCE
Landlord shall maintain, at Landlord’s sole cost, and keep in good condition the roof membrane, roof structure, bearing walls, building foundation, brick and masonry, and landscaping.

TENANT’S MAINTENANCE
Tenant shall maintain repair and or replace all items not covered by Landlord’s Maintenance clause of this lease agreement at the Tenant’s sole cost without setoff, deduction or reimbursement of any kind.

TENANT’S OBLIGATIONS
(a). Tenant shall make only such alterations, improvements, and additions or install any fixtures, whether installed before or after the execution of this lease agreement, necessary to operate a medical marijuana dispensary. Tenant shall seek prior written consent from the Landlord and the Landlord shall not unreasonably withhold such consent. (b). Tenant shall keep the demised property clean and in a safe condition and maintain such sanitation requirements required by regulations or governmental agency. (c). Tenant shall not cause to be done by any act, matter or
thing to be done that would cause an environmental hazard or violate state or local laws or regulations, order or decrees to relating to the creation of an environmental hazard. Tenant shall conduct himself/herself, and all other persons on the demised property in a manner that will not disturb the peaceful enjoyment of others occupying the leasehold premises and those persons residing near or doing business near the demised premises. (d). Tenant shall comply with any and all future rules and regulations that may from time to time be adopted by Landlord in writing. Furnish to Landlord, in writing, any and all defects to the leasehold premises that are the responsibility of the Landlord under the terms and conditions of this lease agreement.

SALES CLAUSE
In the event of the sale of the leasehold premises and/or the building in which the leasehold premises are contained the new owner may give the Tenant the leasehold premises; providing that such notice to vacate does not extend beyond the expiration date of the term of the lease. If Landlord decides to sell the leasehold premises, he shall give the Tenant the right of first refusal to purchase the premise.

ENTRY BY LANDLORD
Tenant herein agrees to permit the Landlord, its agents, employees and persons authorized by Landlord to have access to the leasehold premises. Once Tenant is operational, Landlord acknowledges that his access to the premises may be limited to the extent required by the Pennsylvania Medical Marijuana Act. Landlord will not permit anyone under the age of 18 to access the premises on his behalf. Prior to Tenant taking possession of the premises, Landlord shall have complete use and enjoyment to use the premises in any way they choose.

LOCKS AND KEYS
It is agreed and understood the Landlord has a right to have possession of a key/s for any and all locks installed on the building containing the leasehold premises. The Landlord reserves the right, in an emergency situation, to remove any lock Landlord has no key and replace with another lock.

NOTICES & PAYMENTS
All notices required other than those specified hereunder shall be deemed sufficiently given if sent by certified mail, return receipt requested, addressed:

To the Landlord:

To the Tenant:

BrightCare NEPA, LLC
425 Spruce Street, Suite 200, Scranton, PA 18503
SIGNS
Tenant herein shall not erect any signs on the premises without first obtaining the consent of the Landlord, which consent Landlord agrees it will not arbitrarily or unreasonably withhold, and in the event such consent is obtained.

ALTERATIONS IMPROVEMENT
Landlord understands that Tenant will need to make alterations to the premises to comply with state law, including the installation of security surveillance equipment, a safe or vault, an awning to provide privacy during product transfers, and other improvements intended to make the property more suitable for a medical marijuana dispensary. The cost of such alterations and or improvements shall be at the sole cost of the Tenant.

FORCE MAJEURE
The parties shall not be required to perform any term, condition or covenant in this Lease so long as such performance is delayed or prevented by force majeure, which shall mean acts of God, labor disputes (whether lawful or not), material or labor shortages, restrictions by any governmental authority, civil riots, floods and any other cause not reasonably within the control of the parties and which by the exercise of due diligence the party is unable, wholly or in part, to prevent or overcome.

CHOICE OF FORUM
The Parties intend that this lease, and any disputes arising from it, shall be governed by the laws of the Commonwealth of Pennsylvania and shall be litigated in Wayne County Pennsylvania.

IN WITNESS THEREOF, THE PARTIES HERETO SET THEIR HANDS AND SEAL

THIS 2 DAY OF March 2017 A.D.

Accepted by Landlord: ___________________________ Date: 3/2/17

Accepted by Tenant: ___________________________ Date: 3/2/17
ACKNOWLEDGMENT

I, John and Cheryl Lazorek, hereby acknowledge that the Tenant under this lease agreement intends to operate as a permitted medical marijuana dispensary in accordance with the requirements of Act 16 of 2016 (Pennsylvania Medical Marijuana Act) for the term of the lease, which exceeds the term of the Tenant’s initial permit, at the property I own and lease to them located at 588 Easton Turnpike, Hamlin, Salem Township, County of Wayne, Commonwealth of Pennsylvania 18427.

Landlord: [Signature] Date: 3/2/17

Cheryl Lazorek
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
Affidavit of Business History

State of Pennsylvania

County of Northampton

The undersigned, Diane Makowski, 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:

<table>
<thead>
<tr>
<th>Name of individual</th>
<th>Role (principal, operator, financial backer or employee)</th>
<th>Business name and address</th>
<th>Position of management or ownership of a controlling interest</th>
<th>Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joshua Kahn</td>
<td>Principal</td>
<td>Takoma Wellness Center LLC 6925 Blair Rd NW Washington DC 20001</td>
<td>Owner/Manager</td>
<td>2011-present</td>
</tr>
</tbody>
</table>

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).

Signature of Affiant and Title

Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

JENNIFER KELLY
Notary Public
CITY OF BETHLEHEM. NORTHAMPTON COUNTY
My Commission Expires Apr 2, 2019

Sworn to and subscribed before me this 14th day of March, 2017.
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"
Affidavit of Criminal Offense

State of Pennsylvania

County of Northampton

The undersigned, Diann Molcowski, hereby certifies the following by checking the boxes below:

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):

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

☐ One or more operator(s) listed in this permit application has 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): 

[Signature]  3/14/17  
Signature of Affiant and Title  Date

Sworn to and subscribed before me this 16 day of March, 2017.

[Signature]  
Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
JENNIFER KELLY
Notary Public
CITY OF BETHLEHEM, NORTHAMPTON COUNTY
My Commission Expires Apr 2, 2019

MY COMMISSION EXPIRES: April 2, 2019

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
Attachment I: Affidavit of Capital Sufficiency

Instructions:
- The applicant must submit an affidavit stating that the applicant meets the capital requirements set forth in §1141.30 (relating to capital requirements)
- Note that there are two different versions below:
  o Attachment
ATTACHMENT I-2: AFFIDAVIT OF CAPITAL SUFFICIENCY FOR A DISPENSARY PERMIT APPLICANT

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH

AFFIDAVIT OF CAPITAL SUFFICIENCY

State of Pennsylvania )
County of Northampton ) ss:

IWE Diane Molewski

ADDRESS

PHONE

CITY STATE ZIP CODE COUNTY

For the following applicant:

BrightCare NEPA LLC NAME OF BUSINESS

425 Spruce Street Ste 200 ADDRESS
570-762-9725 PHONE

Scranton PA 18501 Lackawanna CITY STATE ZIP CODE COUNTY

hereby certify that the Applicant named has at least $150,000 on deposit with one or more financial institutions:
<table>
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<tr>
<th>Type of Capital</th>
<th>Source of Capital</th>
<th>Name and address of financial institution</th>
<th>Account number</th>
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</table>
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).

[Signature]
Signature of Affiant and Title

Sworn to and subscribed before me this 16th day of March, 2017.

[Signature]
Notary Public

MY COMMISSION EXPIRES: April 2, 2019

[Notarial Seal]
COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
JENNIFER KELLY
Notary Public
GITY OF BETHLEHEM, NORTHAMPTON COUNTY
My Commission Expires Apr 2, 2019

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
Attachment K: Release Authorization

Instructions:

- Execute the following release authorization
- Scan the completed and executed release authorization below save it as a PDF file called "Attachment K," using the
RELEASE AUTHORIZATION

TO: ____________________________________________________________

(Do not write above this line - For Department of Health Only)

FROM: BrightCare NEPA LLC  Diane Molenski

Applicant's Name

1. Diane Molenski, by and on behalf of the undersigned applicant, have filed a
permit application with the Pennsylvania Department of Health ("Department"). I certify that I am authorized by the
applicant to submit this Release Authorization on its behalf and to bind the applicant to all provisions within this
Release Authorization. I understand that the applicant is seeking the granting of a privilege and acknowledge that the
burden of proving the applicant's qualifications and suitability for a favorable determination is at all times the burden of
the applicant.

I understand that a background investigation may be conducted by the Department pursuant to its statutory duty to
investigate the character, honesty, integrity and suitability of myself and any entity with which I am associated. I
further understand and agree that I am voluntarily executing this Release Authorization to expressly authorize and
permit the Department to obtain any and all information it deems necessary, and accept any risk of adverse public
notice, embarrassment, criticism, or other action or financial loss which may result from action with respect to this
permit application.

The rights and powers herein are granted to facilitate the background investigation being conducted by the
Department at my request and on behalf of the applicant and is not otherwise intended to create or establish a legal
or fiduciary relationship between the Department, its agents and employees, and me. I hereby acknowledge that no
such relationship exists.

1. 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.

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 an agent of the Department to obtain and review copies of 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. This Release Authorization extends to the review and copy of any information protected by law or contact
from disclosure, privilege or obligation.
5. I do for the applicant, as well as for myself, my heirs, executors, administrators, successors and assigns, 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.

IN WITNESS WHEREOF, I have executed this Release on this __ day of March, 2017.

[Signature]
Authorized Signatory

STATE OF Pennsylvania
COUNTY OF Northampton

On this __ day of March, 2017, before me, a Notary Public, personally appeared ___________________________ (known to me or satisfactorily proven) to be the person whose name is subscribed in this Release, and acknowledged that he/she executed the same for the purposes herein contained.

IN WITNESS THEREOF, I hereunto set my hand and official seal.

[Signature]
Notary Public

MY COMMISSION EXPIRES April 2, 2019

[Seal]
COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
JENNIFER KELLY
Notary Public
CITY OF BETHLEHEM, NORTHAMPTON COUNTY
My Commission Expires April 2, 2019
Attachment L: Applicant Priorities for Multiple Applications

Instructions:
- This attachment is for applicants who are submitting multiple medical marijuana organization permit applications. Use this attachment to indicate your priorities for which medical marijuana regions or counties you

| Business Name, as it appears on the applicant's certificate of incorporation, charter, bylaws, partnership agreement or other official documents: |
| BrightCare NEPA LLC |
| Trade names and DBA (doing business as) names: |
| N/A |
| Principal Business Address: 425 Spruce Street Ste. 200 |
| City: Scranton | State: PA | Zip Code: 18501 |
| Phone: 570-762-9725 | Fax: N/A | Email: brightcarenepa@gmail.com |

A. Priorities for Multiple Grower/Processor Permit Applications

Please check one of the following:
- The applicant would like to make the Department aware of the applicant's priorities as listed below
- The applicant has no preference regarding medical marijuana regions

<table>
<thead>
<tr>
<th>MEDICAL MARIJUANA REGION</th>
<th>PRIORITY (If you intend to submit a permit application for more than one medical marijuana region, please rank your preferred region from 1-6, with 1 being the highest ranking)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1- Southeast</td>
<td>Priority __</td>
</tr>
<tr>
<td>2- Northeast</td>
<td>Priority __</td>
</tr>
<tr>
<td>3- Southcentral</td>
<td>Priority __</td>
</tr>
<tr>
<td>4- Northcentral</td>
<td>Priority __</td>
</tr>
<tr>
<td>5- Southwest</td>
<td>Priority __</td>
</tr>
<tr>
<td>6- Northwest</td>
<td>Priority __</td>
</tr>
</tbody>
</table>
B. Priorities for Multiple Dispensary Permit Applications

Please check one of the following:
- The applicant would like to make the Department aware of the applicant's priorities as listed below
- The applicant has no preference regarding county

<table>
<thead>
<tr>
<th>MEDICAL MARIJUANA REGION</th>
<th>For each region for which you plan to submit multiple applications, please indicate the counties in order of priority, with 1 being the highest</th>
</tr>
</thead>
</table>
| 1- Southeast             | ______ Berks  
|                          | ______ Bucks 
|                          | ______ Chester 
|                          | ______ Delaware 
|                          | ______ Lancaster 
|                          | ______ Montgomery 
|                          | ______ Philadelphia |
| 2- Northeast             | ______ Lackawanna 
|                          | ______ Lehigh 
|                          | ______ Luzerne 
|                          | ______ Northampton |
| 3- Southcentral          | ______ Blair 
|                          | ______ Cumberland 
|                          | ______ Dauphin 
|                          | ______ York |
| 4- Northcentral          | ______ Centre 
|                          | ______ Lycoming |
| 5- Southwest             | ______ Allegheny 
|                          | ______ Butler 
|                          | ______ Washington 
|                          | ______ Westmoreland |
| 6- Northwest             | ______ Erie  
|                          | ______ McKean  |
EMPLOYEE QUALIFICATIONS, DESCRIPTION OF DUTIES AND TRAINING
(contd.)

A. Duties, Responsibilities, and Roles of each Principal, Financial Backer, Operator Employee

Sam Edwards, Patient Education Manager: Oversee Dispensary Education Program, including developing seminar, website, educational materials, patient education materials and so on. Host outreach activities directed at patients, caregivers and community related to the medical marijuana program, marijuana plants and products in general, and our dispensary services.

Vince Canales, Security Manager: Oversee security team and ensure compliance with Security Plan. When necessary, develop improvements to the Security Plan and oversee related staff training. Also, this position ensures all security equipment is well maintained and properly functioning. This position must take all reasonable measures to ensure the protection of patients, staff, product and the facility itself.

Josie Vitale, CEO: Our CEO will be responsible for implementing our company’s vision throughout all of our facilities. They will work directly with the executive and departmental management team to ensure we are exceeding patient and DOH expectations on all fronts. CEO will provide general leadership and ensure efficient operations.

Giro Tom Hall, CFO: The CFO will ensure financial discipline of the company and will keep all necessary financial reports and records.

Josh Kahn, COO: Our COO will oversee all dispensing operations to ensure they comply with standard operating procedures. They will also oversee contractual relationships with grower/processors to ensure we can provide affordable, high quality medical products to our patients. The COO will manage all departmental managers and interact with DOH when appropriate.

Frank Wang, Dispensary Manager, Head Pharmacist: The Dispensary Manager and Head Pharmacist will oversee the day to day operations of our flagship dispensary and serve as the on-site pharmacist for patients. They will ensure all staff comply with regulations and standard operating procedures. They will provide patient consultation on an as-needed basis and provide general leadership to the dispensary team.
Farooq Quershi, Medical Officer: This position will ensure the health and safety of all personnel and will ensure the company operates in accordance with its medical mission. The position will also work with the company’s healthcare and research partners.

Rev. Katie Day, Community/Patient Outreach: This position will oversee implementation of our Community Impact Plan as it relates to community and patient outreach efforts. The position ensures we are exceeding patient expectations and are operating as good neighbors.

Diane Molewski, Owner: The owner will not be involved in operations at this time.

Dona Hall, Clinical Specialist: Oversee clinical aspects of dispensary and manage dispensary relationships with certifying practitioners if our patients. When appropriate, this position will work with our healthcare, educational and research partners.

Mike Molewski, Financial Backer: The Financial Backer will provide the necessary capital to the company before reaching break-even. This position will have no operational role.

Alan Paynter, Diversity and Inclusion Officer: This position will oversee the creation, improvement and implementation of our Diversity Plan.

Judith Pryblick, Professional Education/Outreach: Oversee Dispensary Physician Education Program, including developing seminars, website, physician education materials, and so on. Host outreach activities directed at physicians who certify or are considering certifying medical marijuana for their patients.

**B. Employee Qualifications of each Principal and Employee**

**SAMANTHA A. EDWARDS:**

Samantha A. Edwards is an entrepreneur and inspirational leader. Spending a majority of her career as an Educator, she has earned multiple awards and has been published for her innovative work in educational design and technology integration. As a visionary leader in her field, her presence is often requested on strategic planning committees, development teams, as well as community outreach programs.

Samantha’s educational background includes: A leadership certification *(Principal K-12)* from *Drexel University*, a Masters in *Development and Strategies* from *Wilkes University*, a certification in *Bullying Prevention, Diversity, and Inclusion* from *Delaware Valley College*, as well as the completion of an additional Masters in *Instructional Media* from *Wilkes University* this Spring.
Along with over 15 years of experience in the field of Education, Samantha has acquired work-related experiences in other industries as well. She served as the Director of Business Development for a financial company in the Lehigh Valley, performed as a top-selling Real Estate Agent, and invested time in Los Angeles working in the Entertainment Industry specializing in Public Relations, Production, and Marketing. Her most recent endeavor included an active role as an Executive Producer of Daniel Roebuck’s feature film, Getting Grace, which is a story about a 16-year-old girl who is living her life to the fullest as she embraces her terminal cancer diagnosis. Samantha also volunteers her time to programs that benefit children with disabilities, as well as offering her time and resources to the LGBTQ community.

As a Founding Partner and Vice President of Education and Innovation, Samantha will develop and manage new ideas and innovation for BrightStar Biomedics. She will also lead BrightStar’s Community and Patient Educational Outreach teams. These teams will provide knowledge and experiences through educational programs to increase awareness of the palliative benefits and healing properties of medical cannabis. Samantha was born and raised in Wayne County, Pennsylvania, and currently resides in the Lehigh Valley with her wife and two sons. She looks forward to advancing her professional career in an industry where she can continue to make a difference by helping others.

**ISMAEL VINCE CANALES:**

Ismael Vince Canales was born and raised in Philadelphia and is a security expert. He served 6 years in the United States Air Force (USAF) and was awarded the National Defense Medal for Service during Operation Desert Storm. Upon his separation from the USAF, he became a Prince George’s County Police officer in Maryland and served for over 21 years. Vince also served three terms as President of the Fraternal Order of Police, Prince George's County, Lodge 89 where he helped manage over $600 million in assets for the police pension plan. Vince currently serves as a member of the Bowie City Ethics Commission and as a member of the Maryland Police Training Commission.

Vince attended and completed the prestigious Harvard University, John F. Kennedy School of Government, Executive Education for State and Local Government program. He now serves as the President of the Maryland State Fraternal Order of Police and is the Chief Security Officer for Maryland grower and processor licensee, Holistic Industries LLC.

**JOSEPHINE VITALE:**

Josephine S. Vitale is an Ironman Triathlete having challenged herself to the limits of human physical endurance and thrives in challenging environments in life, in business and in endurance sports. Josie has spent her career in the pharmaceutical and medical device industries, having worked for GlaxoSmithKline after graduating from the University of Pittsburgh. She earned success from the start winning the GSK rookie of the year award in her first year in pharmaceutical sales and she continued her success by consistently performing above sales goals for the Central Pennsylvania region. Josie earned a reputation early in her career at GSK as someone who will outwork the competition to service her customers and GSK recognized her commitment and invited her to join their Leadership Development Program.
Josie would go on to accept an offer from Johnson and Johnson to be an Area Business Specialist in the Janssen organization supporting business development for injectable atypical antipsychotic medications to treat schizophrenia and bipolar disorders. It was in this role that she began her advocacy work on behalf of her customers and her patients. As the Capital Region Business Manager Josie was responsible for influencing state leaders to gain and maintain favorable formulary position for the company’s medications in a complex care delivery model. During her tenure at Johnson and Johnson she consistently performed significantly above goals winning the company’s highest awards on numerous occasions. Josie was a leader in Johnson and Johnson’s Management Development program and shared her experience in strategic planning, execution, and new product launches and indications on a national level. She was instrumental in the creation of the company’s national business plan development strategy and was often deployed as a territory management analytics trainer.

Taking on new challenges and succeeding is in Josie’s DNA. She spent six years excelling at Johnson and Johnson but left to take an offer from the world’s largest device manufacturer Medtronic, Plc. As an Executive Territory Manager in the prestigious Neuromodulation division she began marketing implantable neuromodulation therapies for patients suffering with chronic back pain and movement disorders. Josie has extensive experience commercializing medical devices, pharmaceutical agents and biotechnology to support dynamic market growth. Currently serving in Sales Management at Nevro Corporation a Neuromodulation start-up she frequently consults with health systems, revenue cycle and finance managers to understand reimbursement nuances with Medicare Transitional Pass-Through payments and other complexities of health economics.

The role women play in executive and sales leadership in the biotechnology sector has always been a passion for Josie. Throughout her career she continuously served this passion by participating in Global Women’s leadership and development programs at Medtronic and J&J and mentoring future leaders. She looks forward to bringing her expertise at commercializing pharmaceuticals and biotechnology to the Medical Cannabis industry.

DIANE MOLEWSKI:

Diane serves as co-general partner of Molewski Partners, LP, a diversified investment partnership founded in 2000. Since her retirement from the financial services industry, Diane has shifted her focus to serving the needs of the community. She has worked in various capacities including volunteer, community leader, and philanthropist.

Diane is a former co-chair of the Greater Lehigh Valley United Way’s Alexis de Tocqueville Society for 6 years. She is member of the Lehigh Valley Food and Wine Festival Committee, which benefits the Northampton Community College Foundation. Diane is also a member of the Lehigh Valley Wine Auction and Gala Committee and Ambassador Committee that benefits The Children’s Home of Easton. She is also an avid golfer and is a member in the Saucon Valley Country Club ladies’ 18-hole golf committee.

Diane is married to Mike Molewski and they have 3 daughters ages 29, 27 and 24. Diane’s hobbies and activities include golf, bowling, skiing, travel, knitting, crafting, and cooking.
DONA HALL:
Dona Hall, MS, OTR/L, is an occupational therapist who has worked in a variety of medical areas, including the most recent field of outpatient rehabilitation. She would work very closely with the entire medical team in order for each patient to become as independent as possible and improve their overall quality of life. Dona began her career with a Bachelor of Science degree from Temple University in Exercise Physiology and specializing in Cardiac Rehabilitation. While working in the medical field, she pursued a Master of Science degree in Occupational Therapy from Misericordia University. Upon graduation, Dona worked in various areas of medicine that her degree would encompass. She is an active and compassionate resident in Luzerne County and volunteers her time with various organizations, including the United Way of Wyoming Valley, where she is a Health Investment Committee Team Member. Dona was born and raised in Berks County, Pennsylvania, and currently resides in Luzerne County with her husband and two young children.

MIKE MOLEWSKI:
Mike is a Principal and financial advisor with CAPTRUST, an investment advisory and financial services firm that has in excess of $200 billion of assets. Mike is responsible for leading the Strategic Advisor Group, a division within firm that provides multigenerational business and estate preservation, wealth planning, investment advisory, and life insurance strategies. Mike works with many industry leading companies, their owners and executive teams, as well as families with substantial wealth, family offices, and high net worth individuals. Prior to becoming a Principal at CAPTRUST, Mike served as founder and CEO for MFP Strategies, Chairman of the firm’s investment, management, and compliance committees. Mike has worked in the financial industry for 33 years. He is a noted speaker and considered by his peers to be a thought leader and subject matter expert. Mike also leads the M Financial Group relationship for CAPTRUST, where he has been a member firm principal and shareholder for over 25 years.

Mike graduated in 1984 from King’s College with a double major in economics and psychology and completed graduate work in taxation at the McGowan School of Business. He is a Certified Financial Planner™ (CFP®) and Chartered Financial Consultant™ (ChFC®).

Mike is a Member of the Board of Directors of American Bank where he serves as Chairman of the Asset Liability, Audit Committee, Technology Committee, Nominating Committee, Loan Committee, and Compensation Committee. Mike also serves on the Technology Committee for the M Financial Group where he has been a shareholder for over 25 years.

Mike is very involved in the community. Mike is co-chair of the Greater Lehigh Valley United Way’s Alexis de Tocqueville Society. He serves on the Board of Directors of King’s College and is a member of the Audit and Institutional Advancement Committees. He is Vice Chairman
and Board Member of the Northampton Community College Foundation. At NCC, he serves as Chairman of the Audit Committee and is a Member of the Executive Committee. In addition, he is the Co-Chairman of the Lehigh Valley Food and Wine Festival to benefit Northampton Community College Foundation. Under Mike’s leadership, this event as raised over $1.5 million over the past 8 years and funded hundreds of scholarships for students. Mike also is Co-Chairman of the Lehigh Valley Wine Auction and Gala, which benefits The Children’s Home of Easton. Under Mike’s leadership, he has led the effort that has resulted in raising over $2 million over the past 9 years for children in need. Mike is truly a community leader and philanthropist who gives his time and treasures to many deserving organizations.

TOM HALL, CPA:

Tom Hall brings 20 years of executive, operational and financial leadership to BrightStar. He is the Chief Operating Officer of Horizon Facility Services (and its subsidiaries MLS and PMC) a national company in scale and size with more than 3,000 employees operating in 20 states. Tom started Horizon Facility Services with his co-founder less than 7 years ago as only a two-employee company. Today the companies operate in one of the most complex logistical environments all while providing services to some of the largest companies in the world. Prior to founding Horizon Facility Services Tom was the Corporate Controller with two major US Companies and also served as Audit Manager in a large regional public accounting firm. Tom’s experienced is focused in accounting and finance, business services and logistics. The combination of this experience will serve BrightStar well during its startup and execution phases. Tom grew up in Loyalville, Pennsylvania and earned his accounting and marketing degrees from King’s College in Wilkes-Barre, Pennsylvania. Tom began his career in public accounting before moving to the private sector where he continued his career in accounting and finance before moving out on his own with Horizon Facility Services. During his free time Tom enjoys playing tennis with his son and running and hiking.

ALAN T. PAYNTER:

Alan Paynter has been working with youth and families for 20 years. Currently, he is an Associate Director of Admissions in a highly selective liberal arts college here in Pennsylvania and has traveled up and down much of the eastern United States speaking to students and their families about the extraordinary opportunities available to them in a good college education. His responsibilities have also enabled him to work with thousands of students throughout his career in higher ed. Alan, however, has long had a passion for serving underrepresented and underserved students in the process of pursuing higher education. Spearheading the colleges diversity recruitment efforts have been a major part of his job success. He has been a frequent guest speaker and panelist around the country on various topics surrounding college admissions and college access work. Alan’s expertise has not gone unnoticed as he’s published several local and national articles including two featured in the New York Times Room for Debate section.
Alan’s desire to assist these students emerges from his own background. He is a grandson and raised by the late civil rights activist Ethel R. Lawrence who was responsible for what became known as the landmark NJ Supreme Court Mt. Laurel Decision which called for fair housing. She has been referred to nationally as the “Rosa Parks of affordable housing.” Her work for fairness and equality for those less fortunate was something that Alan could not escape while living with Mrs. Lawrence. He too was a product of a single parent mother who did not finish high school and eventually attempted to take her own life due to the pressures of trying to raise 3 sons with very little resources. With the intervention of his grandmother, Mr. Paynter was able to become the only one in his family to finish high school and earning degrees from both Kutztown and Dusquesne Universities.

In addition to his work at as a college enrollment officer, both he and his wife have been relief house parents at the Milton Hershey School in their hometown of Hershey for the past 15 years. Both he and his wife founded of Hershey Blaze Track Club and Victory Track Alliance, Inc. This track club now operates out of two sites and has served over 300 youth since forming 4 years ago. Alan is a 20+ year member of Iota Phi Theta Fraternity, Inc. and Victor Lodge #73 Prince Hall Masonic Lodge in Reading, Pa and recently served on the board of directors for the Camp Fire USA Adahi Council in Berks County and Reach Prep in Stamford, CT.

Alan and his wife are the parents of three children who have all been educated in the Derry Township School District. One of their children, Christopher, is in his first year at Villanova University where he is a member of the Swim Team. The Paynter’s take great pride in scholastic involvement for young people and are major supporters of their children. As former scholarship college athletes themselves they understand the dedication that comes with being an athlete. They also take great pride in the responsibility to serve others while being fortunate to pursue athletics at any level.

**FAROOQ QURESFI, M.D.:**

Dr. Qureshi earned his undergraduate degree in biological science from Cornell University, his medical degree from Temple University School of Medicine, completed his anesthesiology residency at New York Presbyterian Hospital/Columbia University Medical Center in New York City. During his residency at Columbia, Dr. Qureshi served as chief resident of his anesthesia class during the final year and he went on to complete a pain management fellowship at UCLA Pain Management Center in Santa Monica, California. Dr. Qureshi values sharing his knowledge and experience with aspiring anesthesiologists and serves as an Adjunct Clinical Assistant Professor in the Department of Anesthesiology at Temple University School of Medicine and he is active with the American Board of Anesthesiology, the Spine Intervention Society and the North American Neuromodulation Society. Dr. Qureshi currently serves as the Pain Management Attending physician at St. Luke’s University Health Network in Easton, Pennsylvania.

Dr. Qureshi has extensive experience conducting clinical trials, during his tenure at St. Luke’s University Health Network, Dr. Qureshi has conducted clinical trials of the EVOKE spinal cord
stimulator system, OPTIONS Medtronic clinical trial of high density programming options in spinal cord stimulation, SBWSH1032, Saluda Medical clinical trial examining the safety and effectiveness of using spinal cord stimulation incorporating feedback to treat patients with chronic pain of the trunk and limbs in an extended trial. Prior to joining St. Luke’s, Dr. Qureshi conducted clinical research at Columbia University, Drexel University and Cornell University. Dr. Qureshi has completed clinical research and presented on propofol administration rates during ERCP, Breast and Cystoscopy cases; Infusion Pump Alarm Limits Created using Historical Data from an Anesthesia EMR; and Evaluation of the efficacy of functional near-infrared spectroscopy in monitoring anesthetic depth upon administration of fentanyl.

Prior to completing his medical training, Dr. Qureshi worked for Merck & Co. in West Point, Pennsylvania. While at Merck, Dr. Qureshi led the design and development team responsible for documenting quality testing used to release products for the worldwide Merck Manufacturing Division as well as providing on-site assistance, including modification of business processes and development of supporting technology, during implementation of a laboratory information management system at Merck Manufacturing sites in Ireland, France, Puerto Rico, Italy, and North America. Dr. Qureshi developed the technological foundation to generate quality testing reports used to monitor and release pharmaceutical products within the Merck Manufacturing Division. Dr. Qureshi is married with two young children and has summited Mt. Kilimanjaro.

Frank Wang:
Frank has been in long term care pharmacy since 1991 after graduating from Rutgers College of Pharmacy. While working for Omnicare, he pursued an MBA from Fairleigh Dickinson University graduating in May 1998. He has managed and grown several long term care pharmacies in New Jersey, Pennsylvania, Connecticut and Maine throughout his career. Currently, he works for Partners Pharmacy where he manages a large NJ State Nursing Home Contract and pharmacies in their Florida and Maryland locations. He holds an active pharmacist license in PA, NJ and CT. He is currently registered to take the MPJE exam in FLA and MD which will allow him to reciprocate and be licensed in those states as well.

Frank values the opportunity to be a part of the BrightCare team. Beyond looking forward to the professional challenge and experience, he also has a daughter with epilepsy and understands the potential and health impact that medical marijuana can have on children in need.

KATIE (DONNA) DAY:
Katie (Donna) Day is the Charles A. Schieren Professor of Church and Society at the Lutheran Theological Seminary at Philadelphia where she has served on the faculty since 1985. Prof. Day received her academic training at Gordon-Conwell Theological Seminary (M.Div.), Union Theological Seminary (S.T.M.) and Temple University (Ph.D., Sociology). She has published four books, the most recent being a study of urban religion, Faith on the Avenue: Religion on a City Street (Oxford University Press, 2014). She has co-edited two volumes: Companion to Public Theology (Brill, 2017) and Yours the Power: Faith-based Community Organizing in the
She has also contributed chapters in a number of books and published articles and reviews in journals such as *Cross Currents*, *Journal for the Scientific Study of Religion*, and the *International Journal for Public Theology*, where she also serves on the editorial board. Day was a founding member of the Global Network for Public Theology. As well as her research on urban religion, Dr. Day has conducted major studies of community organizing, Black church arsons and the volunteer effort to rebuild them, religious responses to HIV/AIDS in South Africa, and religious social service agencies. Dr. Day has been a visiting professor at Princeton Theological Seminary, Chester University (U.K.), Stellenbosch University (South Africa), Lutheran School of Theology in Chicago, and the Urban Ecologies program, based at New York Theological Seminary.

Dr. Day is ordained in the Presbyterian Church U.S.A. She is married to Jim Sicks and they have four grown children.

**JOSHUA KAHN:**

Born in Australia and raised in the US in a rabbinic family, Joshua Kahn made aliyah to Israel in 2004 where he completed his Bachelor’s degree at the Interdisciplinary Center in Herzliya. He served in the Israel Defense Forces as a combat soldier and, on completion of his service, Joshua was named Israel Advocate at the University of Florida Hillel, where he served with distinction for an extraordinary three years. In 2013, Josh joined his parents in opening Takoma Wellness Center, Washington’s DC’s first and largest medical marijuana dispensary. He is responsible for policy-making, inventory purchase and control, regulatory compliance, management of staff, and general oversight of the entire operation.

**JUDITH R. PRYBLICK, D.O.:**

Dr. Pryblick is a very successful family practice physician with the St. Luke’s University Health Network. Her 26 years of experience in family medicine has earned her a reputation of being one of the top family doctors in her region. Dr. Judy as she is known by her patients earned her undergraduate degree in Biology from the University of Scranton, her Doctor of Osteopathic Medicine from the Philadelphia College of Osteopathic Medicine. She completed her post-graduate residencies in Family Practice and an Osteopathic Medicine rotation at Allentown Osteopathic Medical Center. Most notably Dr. Pryblick served on the executive committee of the American Medical Society and chaired the Rules and Credentials Committee of the Pennsylvania Medical Society. She is also a past president of the Lehigh County Medical Society and formerly served on the Medical Executive Committee of St Luke’s University Health system. Dr. Judy is married to Gary Pryblick, D.O. and has two children, Ally & Adam.

**C. Steps to Assure Each Principal and Employee Will Meet Training Requirements**
1. Upon hire, Human Resources will enter all new agents into our required training program which must be satisfactorily completed before commencing work at a facility. The company will cover the costs of all required employee training, including all Pennsylvania Department of Health (the Department) required training courses.

2. Training will begin with internal or contracted instructors and trainers covering a wide assortment of subjects, including diversity training, operations, security equipment and measures, product transportation and receiving, product storage, quarantine, inventory quality assurance measures, label verification, inventory management, recall and return policies, diversion prevention, sanitation and safety measures, recordkeeping, and so on.

3. The training program will consist of a series of classes, videos, workbooks, manuals and one-on-one sessions. Trainees must take and pass subject matter examinations and obtain a certificate of completion.

4. Trainees will be enrolled in a Department-approved training course (either administered by the Department or by an approved third party provider). This course will meet or exceed the 2-hour training requirement mandated by Pennsylvania law and regulations.

5. Any new hires who are physicians, pharmacists, physician assistants, and/or certified registered nurse practitioners will also be enrolled in a Department approved 4-hour training course on the latest scientific research on medical marijuana, including the risks and benefits of medical marijuana, and other information deemed necessary by the Department.

6. Once successfully completed, trainees must provide Human Resources with sufficient written proof of the completion of the Department’s required training courses before commencing work at a facility.

7. Human Resources will make follow-up training tools available, including enrollment in our mentorship program whereby an experienced employee will individually mentor a new employee in dispensary daily operations and specific job responsibilities after initial training has been complete. This hands-on mentoring will reinforce much of the information taught and provide a forum for each new hire to ask more detailed questions or seek enhanced assistance in mastering a subject.

8. Human Resources will maintain electronic records of all training courses taken and successfully completed by each employee. HR will track the progress of each employee to ensure they complete all required training before commencing work at a facility. Those employees found to be deficient will be reminded of their obligation to complete training.

9. If required training is not completed within 30 days of initial hire, the subject person may be suspended or terminated from employment.

10. All staff are required to undergo annual refresher training, including up to 10 hours in our refresher training program. If required, employees will undergo additional training in Department-approved courses. Failure to complete refresher training within 60 days of the anniversary of hire is grounds for suspension or termination.

11. Human Resources will track each employee’s completion of refresher training requirements and will provide ample written notices of pending due dates and course options.
12. Human Resources will maintain all training and refresher training attendance logs, certificates of completion, training materials (if available), employee training tracking sheets, and other training related documents and records in electronic form for at least 4 years past the date an employee ceases to work for the company.
DOH REDACTED
<table>
<thead>
<tr>
<th>Activity</th>
<th>Estimated Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department awards permit to company</td>
<td>9/1/2017</td>
</tr>
<tr>
<td>Finalize all plans and designs; select contractor</td>
<td>9/20/2017</td>
</tr>
<tr>
<td>Submit building permit application to municipality</td>
<td>9/22/2017</td>
</tr>
<tr>
<td>Begin Demolition activities</td>
<td>10/1/2017</td>
</tr>
<tr>
<td>Begin construction</td>
<td>11/15/2017</td>
</tr>
<tr>
<td>Begin management interviewing process</td>
<td>12/1/2017</td>
</tr>
<tr>
<td>Begin management training process</td>
<td>12/15/2017</td>
</tr>
<tr>
<td>Begin staff interviewing process</td>
<td>1/1/2018</td>
</tr>
<tr>
<td>Begin staff training process</td>
<td>1/15/2018</td>
</tr>
<tr>
<td>Order and install all equipment and fixtures, including POS system</td>
<td>1/16/2018</td>
</tr>
<tr>
<td>Obtain C/O</td>
<td>2/20/2018</td>
</tr>
<tr>
<td>Pass Department of Health inspections</td>
<td>2/25/2018</td>
</tr>
<tr>
<td>Begin operations (assuming product is ready)</td>
<td>3/1/2018</td>
</tr>
</tbody>
</table>
First Name: Samantha
Middle Name: A.
Last Name: Edwards
Suffix: 
Occupation: Media Specialist, Parkland School District
Title in Applicant's Business: Patient Education Manager
Also Known As: Sam
Date of Birth (mm/dd/yyyy): DOH REDACTED
Address: DOH REDACTED
City: DOH REDACTED
State: DOH REDACTED
Zip Code: DOH REDACTED
Phone: DOH REDACTED
Fax: N/A
Email: DOH REDACTED
Ownership: 51%

First Name: Vince
Middle Name: 
Last Name: Canales
Suffix: 
Occupation: President of Fraternal Order of Police
Title in Applicant's Business: Security Manager
Also Known As: 
Date of Birth (mm/dd/yyyy): DOH REDACTED
Address: DOH REDACTED
City: DOH REDACTED
State: DOH REDACTED
Zip Code: DOH REDACTED
Phone: DOH REDACTED
Fax: N/A
Email: DOH REDACTED

First Name: Josephine
Middle Name: 
Last Name: Vitale
Suffix: 
Occupation: Medical Device Sales Manager
Title in Applicant's Business: CEO
Also Known As: Josie
Date of Birth (mm/dd/yyyy): DOH REDACTED
Address: DOH REDACTED
City: DOH REDACTED
State: DOH REDACTED
Zip Code: DOH REDACTED
Phone: DOH REDACTED
Fax: N/A
Email: DOH REDACTED
Ownership: 16.33%
First Name: Diane
Middle Name:
Last Name: Molewski
Suffix:
Occupation: Housewife
Title in Applicant’s Business: Principal, Financial Backer
Also Known As:
Date of Birth (mm/dd/yyyy): DOH REDACTED
Address: DOH REDACTED
City: DOH REDACTED
State: DOH REDACTED
Zip Code: DOH REDACTED
Phone: DOH REDACTED
Fax: N/A
Email: DOH REDACTED
Ownership: 16.34%

First Name: Dona
Middle Name: Elizabeth
Last Name: Hall
Suffix:
Occupation: Occupational Therapist
Title in Applicant’s Business: Clinical Specialist, Financial Backer
Also Known As:
Date of Birth (mm/dd/yyyy): DOH REDACTED
Address: DOH REDACTED
City: DOH REDACTED
State: DOH REDACTED
Zip Code: DOH REDACTED
Phone: DOH REDACTED
Fax: N/A
Email: DOH REDACTED
Ownership: 16.33%

First Name: Michael
Middle Name: D.
Last Name: Molewski
Suffix:
Occupation: Principal Financial Advisor
Title in Applicant’s Business: Financial Backer
Also Known As:
Date of Birth (mm/dd/yyyy): DOH REDACTED
Address: DOH REDACTED
City: DOH REDACTED
State: DOH REDACTED
Zip Code: DOH REDACTED
Phone: DOH REDACTED
Fax: N/A
Email: DOH REDACTED
First Name: Joshua
Middle Name: 
Last Name: Kahn
Suffix: 
Occupation: COO/Manager 
Title in Applicant’s Business: COO
Also Known As: 
Date of Birth (mm/dd/yyyy): DOH REDACTED 
Address: DOH REDACTED 
City: DOH REDACTED 
State: DOH REDACTED 
Zip Code: DOH REDACTED 
Phone: DOH REDACTED 
Fax: N/A 
Email: DOH REDACTED 

First Name: Farooq
Middle Name: A. 
Last Name: Qureshi
Suffix: MD 
Occupation: Physician 
Title in Applicant’s Business: Medical Officer
Also Known As: 
Date of Birth (mm/dd/yyyy): DOH REDACTED 
Address: DOH REDACTED 
City: DOH REDACTED 
State: DOH REDACTED 
Zip Code: DOH REDACTED 
Phone: DOH REDACTED 
Fax: N/A 
Email: DOH REDACTED 

First Name: Donna
Middle Name: C
Last Name: Day
Suffix: Rev. 
Occupation: Reverend 
Title in Applicant’s Business: Community/Patient Outreach
Also Known As: Katie 
Date of Birth (mm/dd/yyyy): DOH REDACTED 
Address: DOH REDACTED 
City: DOH REDACTED 
State: DOH REDACTED 
Zip Code: DOH REDACTED 
Phone: DOH REDACTED 
Fax: N/A 
Email: DOH REDACTED
First Name: Judith
Middle Name: R.
Last Name: Pryblick
Suffix: D.O.
Occupation: Physician
Title in Applicant’s Business: Professional Education/Outreach
Also Known As: DOH REDACTED
Date of Birth (mm/dd/yyyy): DOH REDACTED
Address: DOH REDACTED
City: DOH REDACTED
State: DOH REDACTED
Zip Code: DOH REDACTED
Phone: DOH REDACTED
Fax: N/A
Email: DOH REDACTED