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  ☒ Northeast
☐ Southwest  ☐ Southcentral  ☐ Southeast

County 1 (Primary Dispensary Location): LACKAWANNA
County 2 (if applicable): LUZERNE
County 3 (if applicable): NORTHAMPTON
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

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:

Keystone Center of Integrative Wellness, LLC

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

☒ Primary Contact or ☐ Registered Agent for this Application

Section 2 – Dispensary Information

The applicant is required to provide a primary dispensary location. The applicant may include a second or third location under this application. A second or third dispensary may be added to a dispensary permit at a later date through the filing of an application for additional dispensary locations.

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

☒ Yes ☐ No

Primary Dispensary Location (please indicate dispensary name as you would like it to appear on the dispensary permit)
Facility Name: Keystone Center of Integrative Wellness, LLC
Address: 1300 Old Plank Road
City: Mayfield
State: PA
Zip Code: 18433
County: Lackawanna
Municipality: Mayfield Boro

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

Summary
In this section, we will first give a description of (KCIW) Keystone Center of Integrative Wellness’ primary dispensary location in the Northeast region. We outline how accessible the dispensary is as well as the transportation services available to those consumers living in Lackawanna County and the surrounding area. Finally, it is explained how KCIW service coordinators will help consumers receive transportation services.

Location

Keystone Center of Integrative Wellness chose 1300 Old Plank Road Mayfield, PA 18433, home of the Northeast Education and Technology (NEET) Center located within Lackawanna County as the primary dispensary location for the Northeast Pennsylvania region. This specific location was selected based on the shared vision of numerous community organizations within Lackawanna County and those of KCIW.

The dispensary is located in Mayfield, PA which is 8 miles north east of Scranton, PA. This location can serve not only the larger city of Scranton which, but also the more rural areas of the county to include Carbondale, Olyphant, Jessup Archibald, Dickson
Dispensary Description
The Keystone Center of Integrative Wellness will be incorporated into the NEET Center and is equipped with state of the art security system. The NEET Center is a 95,000-square foot building that will serve as a business incubator in healthcare, agriculture, and environmental sciences. The location is zoned as C-2 Heavy Commercial.

The main entrance way faces the main parking area on the NEET Center campus, with multiple handicapped parking and ample regular parking available to both clients and employees. The main entrance is ADA compliant (Hemmler and Camayd Architects).
Highway Access
Lackawanna County resident patients traveling to the Mayfield Dispensary have access via Interstate 476, 81, 84. The City of Mayfield is located within Lackawanna County just off of U.S. Route 6.

Public Transportation
The County of Lackawanna Transportation System (COLTS) services Lackawanna County. According to the 2015 Pennsylvania Department of Transportation, COLTS provided services to 1,132,246 people, and of that, 186,922 were senior citizens. The bus route provides service from Lackawanna Transit Center in Scranton directly to the NEET Center in Mayfield, every hour starting at 6:45 and running until Monday – Friday. On Saturday, bus route services start on both ends of the route (Scranton and Carbondale respectively) starting at 8:05am and run every hour from both locations with last trip commencing at 5:05pm.

Public Access
The location is handicap accessible, with handicap parking and ramps throughout. The NEET Center is accessible on #52 route (Carbondale) COLTS line. This route also services:
* St. Joseph’s Children’s Hospital
* Regional Hospital of Scranton
* Mid-Valley Hospital
* Steamtown Mall
* Carbondale Senior Center
* Summit Gardens Apartment Complex

COLTS provides an additional shuttle service through a private sub-contractor that originates at the Viewmont Mall, not the Lackawanna Transit Center. The NEET Center is accessible on the #82 route (Carbondale/Simpson/Route 6) which services:
* Viewmont Medical Services- Geisinger
* Wegman’s
* Ames Plaza
* Burlington Plaza
* Carbondale High Rise
* McCann School of Business

Specialized Transit
All COLTS buses are fully accessible to people with disabilities. All COLTS buses are equipped with a kneeling feature and a wheelchair lift or are low-floor buses with ramps for easy access. COLTS drivers will provide any assistance individuals may need for a safe and comfortable ride and will secure mobility devices at a special area at the front of the bus. Guide dogs and service animals are allowed on COLTS buses.

Throughout Lackawanna County, COLTS bus stops are marked by white signs with blue lettering. The signs identify the numbers of the route(s) that stop at that particular location. The COLTS system also utilizes flag-down stops. A flag-down stop can be any safe and accessible stopping area along the route where a passenger wishes to board the vehicle.

COLTS provides ADA complementary paratransit service to individuals who have a disability that prevents them from using a fixed route bus system. As well as a Rural Transportation program for persons with disabilities. To qualify for either service one can call the Special Efforts Accessibility Transportation program, or SEATS.

COLTS also participates in the Person's with Disabilities Half-Fare Program. This program allows qualified individuals with disabilities, or people who are under 65 years old, the ability to ride for half-fare on fixed route transit service during non-peak periods at a reduced rate of .85.
Shared-Ride/Demand Response service is offered through Lackawanna County Coordinated Transportation. It offers the community door-to-door transportation services throughout Pennsylvania and subsidizes the cost of that service for senior citizens.

Pedestrian and Bike Networks
Situated behind the NEET Center is The Lackawanna River Heritage Trail, part of the 70 mile multi-purpose trail system that follows the Lackawanna River. You can walk, ride or cross-country ski on the trail, or just relax. Lackawanna Heritage Valley Association has increase recreational and accessibility opportunities for people with mobility disabilities by allowing the use of other power-driven mobility devices (OPDMDs) in areas where they can be operated safely, without posing a risk of serious harm to natural and cultural resources.

The Lackawanna River Heritage Trail Upper Valley route connect the towns of Jermyn, Mayfield, Carbondale and Simpson. Through the utilization of the trail, the NEET Center is 2 mile trip from either Simpson or Jermyn and even less distance to Carbondale. In addition, BikeScranton is a free bike share program managed by the Lackawanna Heritage Valley. The program is open to anyone age 16 or older with a valid Driver’s License or state photo ID. Cyclists under age 18 must be accompanied by an adult. It's easy to participate. Simply present your photo ID to a program administrator at any BikeScranton location, and enjoy your ride! Currently, the closest BikeScranton location is at Maywood University in Scranton however, KCIW and NEET center owners will work towards the implementation of another BikeScranton site at the Mayfield trail access point behind the NEET Center.

Coordinating Transportation
Based on our model of using social workers and service coordinators in place of a traditional ‘dispensary agent’, we will be also able to help coordinate medical transportation for those patients that may need it as they can help direct patients to resources that they may be unaware of. Case managers will also assist patients in filling out paperwork if they are eligible for reduced fares under the COLTS transportation programs. In addition, COLTS employees have community outreach programs to assist citizens to learn how to read COLTS schedules, familiarize them with their buses, and answer any questions about the transit system.

Currently, COLTS has held many successful sessions at various senior centers and apartment complexes throughout Lackawanna County. KCIW will offer to host additional sessions at the NEET center to educate any individual who needs assistance to utilize the public transportation system. COLTS will unveil the Google Trip Planning function this year or in 2017 for those participants with internet access. For those individuals who do not, or for those who prefer speaking with a live agent COLTS will also assist in trip planning services. By calling COLTS at 570-346-2061, telling them where the individual will be starting their trip, where they would like to go, and the time they would like to travel, a customer agent will be able to provide information to the individual based
upon their specific details.

Because the KCIW’s operators, principals, and employees knowledge of the Human Service realm, we can also assist any individual who is enrolled in a Home and Community based Waiver that authorizes non-medical transportation as a qualified service. Case managers at the dispensary can coordinate with an individual's Service Coordinator to work towards authorizing the service in their annual Individual Service Plan.

Keystone Center of Integrated Wellness is also participating with ride-sharing programs, Uber and Lyft. New users of these ride-sharing services will be able to utilize a promotion code unique to KCIW that will give them credit towards any future rides they may take.

Closing
At KCIW we understand how important accessibility is to our dispensary location. It is obvious that the easier it is to reach our location the more people we can serve and rehabilitate. As we looked at different sites to house KCIW we wanted to select a central location that is easy to find by residents as well as pull from the surrounding areas. This location meets both of those criteria because it is right off US highway 6 and is right along bus route 52 of COLTS. When it comes to transportation, we are willing to work with patients and assist getting them to our center. In addition, as part of our charitable giving, we will provide a transportation voucher reimbursement for clients who demonstrate extreme financial need.

Second Dispensary Location

<table>
<thead>
<tr>
<th>Facility Name: Keystone Center of Integrative Wellness, LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address: 773 Franklin Street</td>
</tr>
<tr>
<td>City: Wilkes-Barre</td>
</tr>
<tr>
<td>County: Luzerne</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:

Summary
In this section, we will first give a description of (KCIW) Keystone Center of Integrative Wellness’ secondary dispensary location in the Northeast region. We outline how accessible the dispensary is as well as the transportation services available to those consumers living in Luzerne county and the surrounding area. Finally, it is explained how KCIW service coordinators will help consumers receive transportation services.

Location
Keystone Center of Integrative Wellness chose 773 S Franklin, Wilkes-Barre, PA 18702, the former site of Panam Silk Mills Inc., located within Luzerne County as the secondary dispensary location for the Northeast Pennsylvania region.

Summary of Site
This determination was reached based on the shared vision of numerous community organizations within Luzerne County. The dispensary is 1.7 miles from the city center of Wilkes-Barre. This location can serve not only the city of Wilkes-Barre but also the surrounding areas of Dallas, Exeter, Kingston, Forty Fort, Kingston Nanticoke, West Pittston, and West Wyoming.

Zoning
At this specific location, it is zoned as R-2 Residential. However, we have a zoning letter from William C Harris the Director of Planning and Zoning in Wilkes-Barre that states, “Although the property is located in an R-2 residential zone, it is surrounded on three sides by properties that serve heavily commercial purposes.” Mr. Harris, the Mayor, and the City Council approved the use of the lot to KCIW for a medical marijuana dispensary.
The dispensary location is situated in the city of Wilkes-Barre within Luzerne County. We intend to level the current building and create a 4,000 square foot dispensary on the 0.45-acre lot. Wilkes-Barre is a reviving community housing post-secondary institutions such as King’s College, Misericordia and Wilkes universities.
Luzerne County residents and residents in surrounding counties can easily access this dispensary location via Interstate 81. When driving to the location, patients will exit Interstate 81 at either 165 or 165B. To access or exit 81 from the dispensary it is less than a two-mile drive.

Public Transportation
LCTA (The Luzerne County Transportation Authority) is a public transportation service with buses that run throughout Luzerne County and go up as far as Lackawanna County. Route frequency of the various routes averages out to about every half an hour to 45 minutes. They operate from 5am to 7pm Monday through Friday and between 9:00 am and 5:30 pm on Saturdays. There are 24 route stops giving 88% of Luzerne county's population access to public transportation. Anyone ages 65 and older ride free with photo ID. For patients that are out of town, there is a Greyhound bus stop on Main street in the city that is 1.5 miles from the dispensary.

Public Access
The location will be handicap accessible, with handicap parking and ramps throughout. The dispensary is accessible on bus route 5 (parsons) LCTA line. Other stops on that route include Geisinger Medical Center, The Mohegan Sun Casino and hotel, and Wilkes-Barre Vocational-Technical School.
Specialized Transit
LCTA has The Shared Ride program. This is perfect for those individuals with a disability or the elderly. The smaller bus or van comes right to the consumer’s home and takes them to their desired destination. It offers the community door-to-door transportation services throughout Pennsylvania and subsidizes the cost of that service for senior citizens and individuals with disabilities who qualify. Passengers must make trip requests at least one working day in advance of the trip, and must be willing to share the vehicle with other passengers.

Other Transportation
In Wilkes-Barre there are three different Taxi companies patients can use. They are Burgit’s City Taxi, Call a Car Taxi and Posten Taxi. Each company runs in the city and surrounding areas.
KCIW is also participating with ride-sharing programs, Uber and Lyft. New users of these ride-sharing services will be able to utilize a promotion code unique to KCIW that will give them credit towards any future rides they may take.
In the nearby town of Avoca, Pennsylvania there is an airport called The Wilkes-Barre/Scranton International Airport. The Airport is only about fifteen to twenty minutes away from the KCIW site. This is an opportunity for consumers from around the state to access our dispensary. Although it may not be the most preferred or used form of transportation it is another way to make a larger impact and rehabilitate more people.

Coordinating Transportation
Based on our model of using social workers and service coordinators in place of a traditional ‘dispensary agent’, we will be also able to help coordinate medical transportation for those patients that may need it as they can help direct patients to resources that they may be unaware of. Case managers will also assist patients in filling out paperwork if they are eligible for reduced fares under the Luzerne County transportation programs.
Because the KCIW’s operators, principals, and employees knowledge of the Human Service realm, we can also assist any individual who is enrolled in a Home and Community based Waiver that authorizes non-medical transportation as a qualified service. Case managers at the dispensary can coordinate with an individual's Service Coordinator to work towards authorizing the service in their annual Individual Service Plan.

Closing
At KCIW we understand how important accessibility is to our dispensary location. It is obvious that the easier it is to reach our location the more people we can serve and rehabilitate. As we looked at different sites to house KCIW we wanted to select a central location that is easy to find by residents as well as pull from the surround areas. This location meets both of those criteria because it is right off Interstate 81 and is right along bus route 5 of LCTA. When it comes to transportation, we are willing to work with patients and assist getting them to our center. In addition, as part of our charitable
giving, we will provide a transportation voucher reimbursement for clients who demonstrate extreme financial need.

Citations


Third Dispensary Location

| Facility Name: Keystone Center of Integrative Wellness, LLC |
| Address: We were unable to finalize this location. |
| City: Easton | State: PA | Zip Code: |
| County: | Municipality: |

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

Summary

This response will provide a description of the public access to Keystone Center of Integrative Wellness’s (KCIW) Easton Dispensary location, including all local public transportation that is available. Keystone Center of Integrative Wellness’s Easton location will be its Primary location.

Location

Region 2, Northampton County, Easton
Summary of the Site

This location of this dispensary was chosen based on the need for pain management alternatives and the opportunities that our innovative and progressive vision for a wellness center will bring to the communities of Northampton County. The dispensary is located in Easton, PA.

Easton is located Interstate 78, State Routes 22 and 33 (googlemaps.com), and will meet the same municipal zoning and land use requirements as other commercial facilities located in the same zoning district §1141.49. The general neighborhood consists primarily of commercially zoned properties with some residential properties and is compliant with §1161.26(b)(1), as no schools or child-care facilities are within 1000 feet, property line to property, of the proposed dispensary location.

The City of Easton does not currently have medical marijuana dispensaries listed in their zoning ordinances (easton-pa.com).

Public Access

Resident patients of Northampton County may access the Easton Dispensary by using several transportation methods including private car, Lehigh and Northampton Transportation Authority (LANta) buses, ride-share services, AMTRAK train, bicycle, and sidewalks. A majority of Northampton County residents will use a private car or a scheduled/dedicated public transportation service to reach the dispensary via local,
state, and interstate roads.

According to the United Census Bureau, the estimated population of Northampton County in July 2015 was 300,813 people of which, 26,915 people live in City of Easton (census.gov).

Highway Access

Northampton County resident patients traveling to the Easton Dispensary have access to a road network combination consisting of low volume municipal streets/roads that connect to higher volume U.S. and Pennsylvania Routes as well as nearby Interstate highways. The City of Easton is located in Northampton County and is situated between State Route 22 and Interstate 78 (googlemaps.com).

To exhibit traffic volume on these roadways, the black numbers on the map below represents Annual Average Daily Traffic (AADT). AADT is the typical daily traffic on a road segment for all the days in a week, over a one-year period. Volumes represent total traffic in both directions (penndot.gov).

Route 22 is an east-west route entering Pennsylvania from Ohio and New Jersey. From Easton to Mount Union, Route 22 is a two lane road with occasional passing and truck-climbing lanes. Major intersections of Route 22 in Northampton County are: Hanover Township, Bethlehem Township, Palmer Township, and Easton.
Interstate 78 is a highway with a segment located in Northampton County. It is an east-west interstate and is a 4-lane divided highway through Northampton County. The major intersection of I-78 in Northampton County is in Bethlehem Township (wikipedia.com). This intersection is 5 miles from Easton City Center (googlemaps.com).

Public Transportation

KCW has chosen its Easton location for many specific reasons, one being its access to public transportation. According to the 2015 Pennsylvania Department of Transportation Annual Report, LANta bus system provided 4,877,236 fixed-route passenger trips of which 801,099 were for senior citizens (penndot.com).

LANta has an extensive bus route system, as shown below.

Specialized Transit

LANta – Shared Ride/Paratransit

LANta also provides ADA “paratransit” for those with disabilities, discounts for those on Medicaid/Medicare, and free transportation for seniors 65 and older through LANta’s “Reduced Fare Transit ID” program (LANta.org).

LANta offers a variety of services to meet the needs of those with disabilities. All LANta buses are ADA accessible. They have a ramp in the front for entering and exiting the bus. LANta drivers will help and rider that needs assistance and will secure any mobility devices. All LANta buses “kneel” as well for a step lower to the ground (LANta.org).
If an individual is unable to ride the bus, LANta also offers a van service called LANtaVan. LANtaVan is a door-to-door, shared ride (or paratransit) service, available to riders in Lehigh and Northampton Counties who are registered and certified as eligible for sponsorship under various transportation funding programs. This service is a shared ride (LANtabus.org).

**Bicycle Network**
For those more able bodied residents, Easton has many bicycle trails that connect the outlying areas of Easton, as well as other towns farther away such as Bethlehem and the towns in between.

**Train Service**
Although there is not currently Amtrak service in Easton, local officials and community members have been lobbying Amtrak to bring passenger service back to Easton and the Lehigh Valley. Amtrak began a limited service from NYC to Harrisburg in October of 2016 (lehighvalleylive.com).

Septa has many routes and stops located in the Philadelphia metro area with a stop in Doylestown. From there, Greyhound offers service to Easton’s Intermodal Transportation Center downtown Easton.
**Bus Line Service**
Greyhound has services to Easton from cities such as Allentown, Harrisburg, Scranton, Doylestown, and Philadelphia. All buses are equipped with a wheelchair lift. Seats are removed to give a wheelchair passenger plenty of room.

**Other Transportation**
There are quite a few taxi companies that service Easton. Additionally, KCIW is participating with ride-sharing programs, Uber and Lyft. New users of these ride-sharing services will be able to utilize a promotion code unique to KCIW that will give them credit towards any future rides they may take.

Based on our model of using social workers and service coordinators in place of a traditional ‘dispensary agent’, we will be also able to help coordinate medical transportation for those patients that may need it as they can help direct patients to resources that they may be unaware of. Case managers will also assist patients in filling out paperwork if they are eligible for reduced fares under each service’s transportation programs. KCIW will offer to host sessions to educate any individual who needs assistance to utilize the public transportation system.

Because the KCIW’s operators, principals, and employees knowledge of the Human Service realm, we can also assist any individual who is enrolled in a Home and Community based Waiver that authorizes non-medical transportation as a qualified service. Case managers at the dispensary can coordinate with an individual's Service Coordinator to work towards authorizing the service in their annual Individual Service Plan.

In addition, as part of our charitable giving, we will provide a transportation voucher reimbursement for clients who demonstrate extreme financial need.

**Zoning Regulations & Building Permitting**
KCIW’s dispensary is located in Easton, PA, Easton City.

**Recognized Need for Economic Development**
According the 2015 U.S. Census, the national average of American’s living in poverty was 13.5%. Northampton’s average was 8.8%. In stark contrast to Northampton, Easton City’s average was a staggering 22.3%.

To ensure that KCIW promotes economic growth and continues to positively impact the communities of Northampton County, KCIW will work directly with local officials, community leaders, and Northampton County redevelopment groups. This will be achieved through KCIW hosting workshops, offering employment opportunities, and community outreach.

KCIW is dedicated to actively participating in programs that aim to end childhood hunger, such as the BackPack Pals of Easton Program. This program addresses the needs of hungry elementary school children by providing them with non-perishable
foods to take home so that they have access to food throughout the weekends, holidays, or days that school is not in session.

KCWI is also committed to creating and developing desirable jobs with competitive pay and benefits. Economic regrowth begins when businesses offering jobs with salaries that allow for not only day-to-day financial security but as well as disposable income.

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.
IN NARRATIVE FORM BELOW, DESCRIBE A PLAN THAT ESTABLISHES A GOAL OF DIVERSITY IN OWNERSHIP, MANAGEMENT, EMPLOYMENT AND CONTRACTING TO ENSURE THAT DIVERSE PARTICIPANTS AND DIVERSE GROUPS ARE ACCORDED EQUALITY OF OPPORTUNITY. TO THE EXTENT AVAILABLE, INCLUDE THE FOLLOWING:

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

DIVERSITY OF OFFICERS, PRINCIPALS, OPERATORS, FINANCIAL BACKERS, AND EMPLOYEES

Keystone Center of Integrative Wellness (KCIW) is a women-owned business enterprise (WBE) that will pursue Women’s Business Enterprise National Council (WBENC) certification through www.wbenc.org. KCIW has been certified through the Department of General Services’ Bureau of Diversity, Inclusion and Small Business Opportunities (BDISBO) and will participate as such through the Small Diverse Businesses Program. Together, Krista Krebs (Chief Executive Officer/Financial Officer) and Mary Pat Julias (Chief Strategy Officer/Chief Marketing Officer) will own, operate, and control 51% of the company on a daily basis. Both having extensive experience building successful companies from the ground up, they lead a team of extraordinarily talented, accomplished, and diverse individuals who share their passion for improving the quality of life for their patients, employees, and communities.

Our organizations embrace diversity in demonstrable practices daily from practicing,
understanding, and teaching tolerance within our companies, to hosting events for various diverse non-profit organizations. We donate to diverse groups within our communities and recruit and mentor great talent utilizing our network of diversity partners for referrals. Our goal is to build a company that creates a positive, tolerant and accepting environment for all.

Additional minority members of our operational and core staff include:

We also are taking an approach from our Home Health & Medicare experience and implementing a Professional Advisory Committee. Diverse members of this Committee include patient representatives with disabilities, one female doctor, one female doctor and a disabled Vietnam veteran. The goal of this committee is to review programs, policies, and provide insight for patient advocacy.

AFFIRMATIVE ACTION PLAN
Keystone Center of Integrative Wellness’s Official Policy Statement on Equal Employment Opportunity and Affirmative Action
Keystone Center of Integrative Wellness is committed to providing a workplace free of discrimination, harassment and retaliation. KCIW will comply with all aspects of Executive Order 11246, Section 4212 of the Vietnam Era Veterans’ Reemployment Assistance Act of 1974, as amended (“VEVRAA”), Americans with Disabilities Act of 1990, and Section 503 of the Rehabilitation Act of 1973, as amended (“Section 503”). As such, KCIW is committed to taking affirmative steps to promote the employment and advancement of minorities, women, persons with disabilities, and protected veterans. KCIW has developed and implemented an Affirmative Action program to further support its commitment to the principle of equal employment opportunity. KCIW provides reasonable accommodation to the known physical or mental limitations of an otherwise qualified employee or applicant for employment, unless the accommodation would impose undue hardship on the operation of the company’s business.

At a minimum, KCIW expects all of its employees to comply with the principles and spirit of our Equal Employment Opportunity (EEO) and Affirmative Action commitments. To ensure these principles are fully understood and applied with consistency throughout our company, KCIW has adopted and implemented multiple policies under one master policy section, Equal Employment Opportunity Policies. These nondiscrimination policies, which apply to applicants as well as employees, mandate that all terms and conditions of employment
Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

- Filing a complaint
- Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended (Section 503), or its implementing regulations, the Vietnam Era Veterans’ Readjustment Assistance Act of 1974 (VEVRAA), as amended, or its implementing regulations, or any other federal, state, or local law requiring equal opportunity for individuals with disabilities or protected veterans.
- Opposing any act or practice made unlawful by Section 503, VEVRAA, their implementing regulations, or any other federal, state, or local law requiring equal opportunity for individuals with disabilities or protected veterans.
- Exercising any other right protected by Section 503, VEVRAA, or their implementing regulations.

KCIW expects all leaders to comply with the company's EEO and Affirmative Action policies. Leaders are required to understand the company's policies and immediately report any discrimination issues that arise. All complaints will be thoroughly investigated and appropriate corrective action—up to and including discharge—will be taken where indicated. Retaliation or harassment against any employee (or applicant) involved in the filing, investigation, or resolution of a discrimination complaint will not be tolerated.

KCIW's Diversity and Inclusion Department has oversight of the development and implementation of the company's EEO and Affirmative Action (AA) programs. The Diversity and Inclusion Department is responsible for ensuring the implementation of affirmative action program activities, continually monitors progress and takes steps to ensure success. KCIW's AA programs for individuals with disabilities and protected veterans are available for review by any employee or applicant for employment upon request, which may be made by calling our info line.

If you have questions about these policies and their implementation, or believe that the company's Equal Employment Opportunity and Affirmative Action policies have been violated, you should immediately contact the Chief Diversity Officer, Rachael Tackett.

Pay Transparency Policy Statement
Keystone Center of Integrative Wellness will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the company, or (c) consistent with the company’s legal duty to furnish information.
Maintaining an Environment Free from Workplace and Sexual Harassment

KCIW is committed to maintaining a harassment-free work environment to ensure all KCIW employees work in an atmosphere free of abuse or intimidation.

KCIW has established policies and procedures mandating a work environment free from discrimination and harassment. These policies prohibit harassment or discrimination based on the race, color, religion, national origin, gender, sexual orientation, gender identity, age, disability, or veteran status of employees or applicants.

Discrimination or harassment based on any of the above factors is prohibited, as is retaliation against a person who has made a complaint or given information regarding possible violations of these policies. Harassment can include but not limited to offensive language, graffiti, slurs, jokes, threats or intimidation directed toward members of a particular group. Sexual harassment can include inappropriate touching, unwelcome sexual advances, provocative posters and pictures, and e-mail jokes or pictures with gender-based content. Employees who engage in behavior that violates these policies will be subject to corrective action, up to and including discharge.

Every employee is responsible for maintaining a harassment-free work environment. Employees are expected and encouraged to immediately report any possible violations of these policies or complaints of discrimination to the Chief of Diversity. All complaints regarding violations of these policies will be thoroughly investigated, and appropriate corrective action will be taken. Retaliation for filing a complaint or cooperating with an investigation is strictly prohibited and will not be tolerated. All management staff is required to support our commitment to a harassment-free work environment by preventing and addressing discrimination and harassment. Leaders should understand and communicate KCIW policies and procedures, identify potential problems, and implement effective corrective action when indicated.

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Confidentiality Policy
Standards of Conduct
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Grievance and Complaint
Sexual Harassment and Professional Boundaries

INTERNAL STRATEGIC PLAN & DIVERSITY GOALS
Our diversity workplace strategy includes programs to attract, retain, and develop diverse talent, provide support systems for groups with diverse backgrounds, and educate all associates so that we master the skills to achieve sustainable growth.

We will work hard to ensure an inclusive and fair work environment for our employees, all of whom will undergo mandatory diversity training upon hire and then bi-annually thereafter. We find ongoing dialogue leads to better understanding of our colleagues, our suppliers, our patients, our stakeholders, and ultimately, to greater success in the marketplace.

STRATEGIC PLAN
Our strategic plan has three essential pillars – mission focus, accountability, and continual learning. The strategic plan also encompasses several other parts that include a focus on diversity. Our plan is to create a universal definition of diversity and inclusion. We will design strategic outreach and recruitment initiatives to reach all segments of society. We will create an internal KCIW-wide Diversity and Inclusion Committee comprised of employee to monitor progress and support employee engagement and achieve patient satisfaction. KCIW will promote effective communication with employees, patients, and stakeholders to heighten awareness of diversity and inclusion issues and share best practices. KCIW will promote diversity, inclusion, and equity in leadership development programs and continual learning. KCIW will set a path to demonstrate leadership commitment and accountability to diversity and inclusion.
GOALS
Any company must have goals to move forward and continue to be successful. KCIW has 4 main goals that we plan to consistently meet not only within the dispensary, but also within the community as well.

1.) We plan to improve the representation of women and those of Indian, Asian, and Hispanic minority status at all levels of the organization. We also plan to integrate people with disabilities and veterans by driving talent acquisition and management practices to achieve results. We will use specific demographic data from the counties we are working in to set diversity goals and use AAP software to help record and report on our success or shortcomings that will help drive the following year’s goals.

2.) We plan to create an inclusive work environment that fosters creativity and innovation. This work environment will also promote colleague engagement through awareness and inclusive leadership skills training, promoting Work Life Flexibility, and supporting Employee Resource Groups. KCIW will ensure that Diversity and Inclusion initiatives, actions, and results are transparent to all key stakeholders.

3.) KCIW will engage in various stakeholder groups that support and serve our values and interests including our diversity suppliers.

4.) Lastly it will be the goal of KCIW to hold leadership accountable for diversity and inclusion goals and objectives.

OUTREACH PROGRAMS for EMPLOYEES, PATIENTS AND COMMUNITY PARTNERS

Patient Education Outreach
Medical marijuana is a controversial topic within many communities. It is KCIW’s belief that everyone should have access to the most up-to-date information regarding medical marijuana. It is KCIW’s goal to provide a vast array of educational opportunities to the public, caregivers, professionals, and future employees of KCIW.

Community Outreach is a platform to inform the community of its misconceptions as well as reach out to those in the community who could benefit from the positive medical effects it can provide.

Our pharmacists and nursing staff, along with patient care coordinators, will provide routine education through seminars/discussions at a designated location, not limited to some of our community partners’ locations. KCIW will tap from the talented and experienced pool of case managers at Alma Health Skilled Services, and designate Lauryn Mencer as Community Outreach Program Manager. She will be responsible for overseeing and managing outreach activities and educational training discussions.

Recruiting Outreach
One of many ways to meet diversity benchmarks and goals is to have a diverse platform of employees. To be a successfully diverse company, forging partnerships with local diversity-oriented colleges and programs will directly impact our ability to meet our benchmarks for a
diverse environment. KCIW plans to continuously build relationships with local colleges and other various diversity partners on state and local levels, to reach out and recruit talent. This will give us the ability to employ underrepresented talent in the community and meet our diversity staffing goals that KCIW sets annually.

We intend to leverage our professional relationships to recruit, foster and retain talent. Listed are several potential talent pools that have state and national presences:

- Executive Leadership Council
- Hispanic Association of Colleges & Universities
- LGBT Career Link
- National Black MBAs Association
- National Council of Disabilities & Business
- National Society of Hispanic MBAs
- National Society of Black Engineers
- Parents & Friends of Lesbians and Gays
- Society of Hispanic Engineers
- Society of Women Engineers
- Students in Free Enterprise
- STEM Connector
- Thank A Service Member
- Wounded Warriors Project
- Pennsylvania Developmental Disabilities Council
- The ARC of Pennsylvania
- Pennsylvania Advocacy and Resources for Autism and Intellectual Disability
- Disability Rights Pennsylvania
- Spina Bifida Association
- Central PA SCI Networking Support Group
- United Cerebral Palsy
- National Multiple Sclerosis Society

KCIW will strengthen and develop relationships with targeted groups (e.g. minority populations) within colleges/universities in the local area. Some of these relationships in the Northeast region will include Marywood College, Penn State, and The University of Scranton. We also plan to work with these universities and the minority groups on campus, specifically those who are working toward Post Graduate work-permits in science, medical and chemistry fields.

In Luzerne County alone, there is an average of 26.4% of students who are designated as minority status including Hispanic, Asian, and Indian ethnicities. Integrating internships with the KCIW’s Mayfield and Wilkes-Barre dispensaries and/or through our other health care entities will allow us to reach out to those in the community who are looking into careers in pharmacology, social work, case management, and management and hopefully attract them to stay within their cities. KCIW can use informational sessions and educational seminars on campus, or off campus that is geared to a minority population to successfully keep up to date with medical marijuana and its effects on patients

Internal Diversity Programs, in regards to KCIW employees, are a platform that will make for a successfully diverse and positive work environment. This will not only foster creativity and innovations, but will also promote colleague engagement through awareness and self-esteem.
within the workplace. Internal Diversity Knowledge and cultural competence should start with senior management and be passed down to employees. Management will receive workplace diversity training at least bi-annually. KCiW will require in-person diversity courses which will make a positive impact on the workplace. This will ensure that cultural competence is shared throughout the company.

Veteran’s Affairs

These are just two personal stories of many shared throughout KCiW employees. KCiW plans to partner with local veteran affairs organizations in this region to provide knowledge and services to local veterans outside of “just education”. By having experienced social workers on staff, KCiW will reach out to various veteran affairs organizations to help provide services to veterans who may need assistance getting through their daily lives.

Further, KCiW will sponsor and/or host events, such as job fairs, direct recruiting, and assistance with skill set development via educational sessions that will directly inform and educate the community of medical marijuana benefits. KCiW has aligned with various individuals who are making huge strides towards improving their quality of life.

Pennsylvania is the 4th leading state in regards to the population of working age veterans. Of the 1,035,566 working age veterans who live in Pennsylvania, 41,505 live in the Northeastern region. KCiW’s proposal is to work with the Lackawanna County Veterans Affairs Office, local hospice agencies, the Scranton Veterans Office, and local veteran based community centers to give presentations regarding medical marijuana, the positive medicinal effects that it has, as well as the different jobs that are/will be available to our veterans with our newly proposed centers in their community. We plan to use our resources to also hold events for veterans to continue to inform and educate them regarding the medical marijuana.

The Luzerne County Veteran Affairs office in Hazleton will be one opportunity to make relationships and work with veterans in the local community. We will be able to share publications that can be viewed in the Veteran Affairs Office to continue to educate and inform the Veteran Community in Luzerne County.

Professional Networking

KCiW’s plan is to work with local Chambers of Commerce in Lackawanna County. Within the county, we will make our presence well known by participating in the Northeastern Pennsylvania Women’s Leadership Conference by not only attending but hosting a booth at the conference to recruit new staff members for our dispensary. Lackawanna County hosts multiple women’s networking luncheons. KCiW plans to host luncheon events geared toward women, disabled citizens, veterans, and minority persons within the community. In both Luzerne and Lackawanna counties an employment expo is held to promote businesses in the local community. By including our business in the employment expos, we will not only be able to continuously provide representation of the dispensary but also attract multiple individuals who come from diverse backgrounds who may be seeking employment within the social services and dispensary field. KCiW will work within the community to provide
networking opportunities to link patients, future patients, and professionals living in the community to always have the most up to date information.

KCIW plans to distribute written material and create working relationships with local physicians as an outreach for knowledge and education regarding medicinal marijuana. Through our Community Outreach Coordinator, KCIW will host luncheons, informational sessions, and other similar events to engage local physician’s to see the positive impact medical marijuana has on patients.

Minority Ethnic Population
KCIW intends to continuously connect with the community using diversity-oriented outreach programs, educational seminars, informational sessions, and events to involve the community. Lackawanna County has a Nepali Population of around 4,000 individuals. With the creation of social work positions, we plan to hire a social worker to work directly with the Nepali population who is fluent in the native Nepali language. Outreach programs in regards to the effects of medical marijuana and PTSD will be very effective for those in the Nepali community affected by manifested trauma.

In Luzerne County, Bethany Christian Support Services is a main resource to the local Nepali/refugee community. KCIW plans to not only successfully integrate medical marijuana into the community in ways it would positively affect those with manifested trauma, but also to assist with case management support for those refugees trying to make a successful, healthy life in their community. Again, with the creation of social work positions, we plan to hire a social worker to work directly with the Nepali population who is fluent in the native Nepali language. KCIW is more than willing to host events while partnering with Bethany Christian Services to ensure that we are getting our information and our effectiveness out to the Nepali Community.

Autism
According to the recent Pennsylvania Autism Census Update completed in 2014, data revealed that over 55,000 individuals living in the state of Pennsylvania are currently receiving services and being treated for a diagnosis of Autism. The number of individuals with this diagnosis has significantly increased since the initial study completed in 2009. Based on this data and the CDC, it is determined that about 1 in 68 children within Pennsylvania having the diagnosis of autism. Additionally, it is predicted that number of adults diagnosed with Autism living within the Commonwealth of Pennsylvania will rise to over 36,000 by the year 2020 and will continue to grow as children transition into adulthood.

Due to the increasing demand for services and programs to assist the autism population, KCIW will partner with a multitude of local community groups to provide education, employment opportunities and alternative services. KCIW is committed to reaching out to underserved communities and developing long-term relationships with professional, educational, and nonprofit organizations that serve those communities.

There are several local community programs that KCIW plans to integrate services with to ensure that we are able to continuously have our voice and name in the Autism Community. Some of the professional organizations we plan to work with are the ARC of PA, The Advocacy Alliance in Scranton, The Developmental Disabilities Network.
There are a variety of support groups with Luzerne County: ARC of Luzerne County, Autism Mom's which is geared toward parent support. By working through these avenues, we can continue to keep the parents, caregivers, guardians, professionals, and those within the autism community constantly abreast of any current and upcoming information in regards to the positive effects of medical marijuana and the impact it will/can have on the community.

Within the Lackawanna County Community are several Autism support services and groups. KCWiW will work to forge professional relationships with these groups in order to have a direct impact with information and education for parents of children with autism and those who have autism and are of adult age. Some of these agencies include: ARC of PA, Community Resources for Independence, Special Kids Network, PA Client Assistance Program, Kaleidoscope Family Solutions Inc., S.A.F.E. (Supporting Autism Families Everywhere), PA Elks Home Service Program, and the Intermediate Units of PA.

In Lycoming County, there are multiple agencies KCWiW intends to forge professional relationships with to make ourselves available and accessible in the community. The ability to partner with these agencies to then reach out to families in need of support and education regarding medical marijuana will greatly affect the positive impact KCWiW strives to have on the community. Some of these agencies include: Kaleidoscope Family Solutions, BLaST Intermediate Unit 17, Roads to Freedom-Autism Support Group, Autism Spectrum Support Group, Autism and Related Disorders Support Group, and TEAM-Together Everyone Achieves More.

**Internal Workplace Diversity**

KCWiW’s Internal Diversity Programs is a platform that will make for a successfully, diverse and positive work environment. This will not only foster creativity and innovations, but will also promote colleague engagement through awareness and also promote self-esteem within the workplace. Internal Diversity Knowledge and cultural competence starts with senior management and is then passed down to employees. This will ensure that cultural competence is shared throughout the company.

KCWiW will ensure that employment benefits are applicable and effective for all employees. It is important that KCWiW ensures reasonable accommodations for veterans, women, men, minorities and those with physical and intellectual disabilities. Examples of reasonable benefit accommodations include but are not limited to: medical leave for any employee with a PTSD diagnosis, allowance of a patient employee to self-medicate on premises during work hours (1181.22(b)(3)), leave for a minority employee who may need to attend a cultural event, and maternity leave for women.

**CONTRACTS WITH MINORITY, VETERAN, DISABLED AND WOMEN-OWNED BUSINESSES**

Currently, KCWiW has contracts with multiple minority, veteran, disabled, and women owned businesses that relate to the dispensary. These include:

**DOH REDACTED**
McKissick Associates & Affiliates – Architect/Interior
McKissick Associates Insights
Mimar/McKissick Education Studio, LLC

- Minority Owned Firm
- MWBE Certified Firm
- Current Estimated Expenditures: $55K
- Estimated Contract if Awarded: $780K per permit region

Entrepreneurial Marketing - Marketing, Public Relations and Social Media Company

- WBE (Certification in Process) – 100% woman owned.
- Estimated Contract: $75K per year

Northridge Construction – Construction Company

- Disabled Veteran Owned
- Estimated Contracts: $750K

SAMPLE MATERIALS
Attached are sample slides from some of our proposed mandatory employee trainings:

ADDITIONAL

The diversity of our people is what makes Keystone Center of Integrative Wellness exceptional. We recognize together that each person has unique strengths. By embracing those strengths, we all deliver at high performance, as one dynamic team.
DEMONSTRATIONS TO COMMITMENT

Owning and operating successful healthcare businesses in all 67 counties in the Commonwealth, KWIC Principals bring exceptional expertise in identifying the diversity needs of patient populations, which supersedes that of our competitors. The knowledge and understanding that the KWIC team has is beyond demographic statistics. This proficiency is rooted in the daily immersion of working with people from all over the world with a wide range of disabilities. Utilizing the current infrastructure of their health care companies, KCIW already has a network in place set up for contracted translators, sign language interpreters and is able to utilize the TPP relay network for the hearing and visually impaired.

Recognizing that language and disability barriers effect communication, KCIW will provide documents in common languages for those regions.

A few other demonstrations of our commitment to diversity within KCIW include recruitment materials and employment advertising to ensure that KCIW focuses on being an equal opportunity/affirmative action employer. KCIW plans to integrate pictures of employees and articles regarding employees in company publications, including minorities, women, individuals with disabilities, and veterans. All KCIW employment application forms will notify applicants that the company is in compliance with applicable equal employment opportunity and affirmative action statuses.

KCIW will also send out employee satisfaction surveys and maintain a grievance book with the goal of zero grievances and complaints. If a grievance or complaint is filed, a KCIW employee will contact the person who made the grievance or complaint and will follow up accordingly to ensure the issue is resolved and is not repeated. KCIW will also record training data and/or community outreach participation on a bi-annual basis with a specific goal of having a set number of diversity training hours.

ABILITY TO RECORD AND REPORT COMPONENTS OF THE DIVERSITY PLAN

KWIC’s Chief Operating Officer, Chief Diversity Officer and HR Manager have significant experience in documenting and reporting on the components of human resources, Affirmative Action Plans (AAP) and diversity plans. Ensuring each KCIW employee is actively engaged in the diversity process will promote success and effectiveness.

In regards to continued employee cultural competence training and diversity outreach, KCIW staff will utilize “BambooHR”, a human resource driven software that keeps a real-time running record which allows for successful record keeping. BambooHR also monitors and alerts when required employee training is due.

Bi-annual diversity trainings will be implemented for KCIW employees. It is KCIW’s goal and plan to create a positive work environment to ensure all employees feel valued, and with that feeling, all employees will be able to reach their fullest potential and to establish guidelines to address any social climate issues within the dispensary that may be affecting employees.

Requirements for all new hires include fundamental training in overall AAP policy and goals, zero tolerance of racism, harassment, any discrimination, Person First Language, and others. Training will include the skills in recognizing and reporting of any infractions which will then be documented by the HR manager using Bamboo software.
KCIW will use Complete AAP software to document various AAP requirements in order to generate the required reports which include, but not limited to: Mandated Reports, Utilization Summary of Individuals with Disabilities, Veteran Hiring Benchmark, and Adverse Impact Analysis.

KCIW will use a “balanced workforce” strategy to ensure the presence of a culturally competent and diverse workforce is a prioritized goal of the dispensary. KCIW will devise a 5-year actionable, trackable plan to ensure milestones are met and diversity levels remain balanced with attrition. AAP software will be used to track this information. Our Chief Diversity Officer will be responsible for gathering data, setting goals, amending strategies, reporting on the effectiveness of the plan and amending where necessary. The HR manager will be responsible for the documentation of all data.

Overall, our Diversity and Inclusion Strategic Plan creates a culture that values trust, human dignity and provides opportunities for personal development and self-fulfillment fostered by KCIW’s mission and goals.
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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
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

If more space is required, please submit additional information on other individuals in a separate document titled "Principals, Financial Backers and Operators (Contd.)" in accordance with the attachment file name format requirements and include it with the attachments.

B. Please list Employees
Please provide the following information for any employees that have been hired to date to work for the applicant listed in this application. If no employees are currently employed, please leave this section blank.

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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.

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.

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

| Civil and Administrative Action | Yes | No |
Part D – Plan of Operation

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:
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

- 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 you will take to begin the process for the handling, storing, and transporting of medical marijuana and medical marijuana products.

<table>
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If more space is required for the Operational Timetable, please submit additional information in a separate document titled “Operational Timetable (Cont’d.)” 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...
**B. PLEASE DESCRIBE THE EMPLOYEE QUALIFICATIONS OF EACH PRINCIPAL AND EMPLOYEE.**

1. Please see Attachment 9B.
2. 
3. 
4. 
5. 
6. 
7. 
8. 

**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. Please see Attachment 9C.
2. 
Pennsylvania Department of Health  
Medical Marijuana Dispensary Permit Application

<p>| | |</p>
<table>
<thead>
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<tbody>
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</tbody>
</table>

If more space is required for any of the above 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.)” in accordance with the attachment file name format requirements and include it with the attachments.

### D. Licensed Medical Professionals at Facility

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

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

N/A
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/SERVING/ALTERATION PROTOCOLS.

REDACTED

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 marijuana organization or approved laboratory within the Commonwealth will adhere to the following:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If you check “No” to any statement, you must state the reasoning for doing so at the end of this section. If issued a permit, you must be able to affirm each statement by the time the Department determines you to be operational under the Act and regulations.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Medical marijuana will only be delivered between 7 a.m. and 9 p.m.</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>• Medical marijuana will not be transported to any location outside of this Commonwealth.</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>• A global positioning system will be used to ensure safe, efficient delivery of the medical marijuana to a medical marijuana organization.</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>In addition to having a transport vehicle staffed with a delivery team consisting of at least two individuals, the applicant affirms the following:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• At least one delivery team member will remain with the vehicle at all times that the vehicle contains medical marijuana.</td>
<td>☑️</td>
<td>☐</td>
</tr>
<tr>
<td>• Each delivery team member shall have access to a secure form of communication with the dispensary, such as a cellular telephone, at all times that the vehicle contains medical marijuana.</td>
<td>☑️</td>
<td>☐</td>
</tr>
</tbody>
</table>
### Pennsylvania Department of Health

**Medical Marijuana Dispensary Permit Application**

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Upon demand, each delivery team member shall produce an identification badge or card to the Department or its authorized agents, law enforcement or other Federal, State, or local government officials if necessary to perform the government officials' functions and duties.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>Each delivery team member will have a valid driver's license.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>While on duty, a delivery team member will not wear any clothing or symbols that may indicate ownership or possession of medical marijuana.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>Medical marijuana stored inside the transport vehicle may not be visible from the outside of the transport vehicle.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>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.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>Any vehicle accidents, diversions, losses, or other reportable events that occur during transport of medical marijuana must be immediately reported to the Department either through a designated phone line established by the Department or by electronic communication with the Department in a manner prescribed by the Department.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>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.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>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.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>A transport vehicle may be stopped and inspected along its delivery route or at any medical marijuana organization.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
<tr>
<td>If a third-party contractor is used, the contractor must comply with all the transportation requirements listed in the Act and regulations.</td>
<td>☑️</td>
<td>☐️</td>
</tr>
</tbody>
</table>

**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

---

*Image 0x0 to 612x792*
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

<table>
<thead>
<tr>
<th>Information and meet the following requirements:</th>
</tr>
</thead>
<tbody>
<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>
</tr>
<tr>
<td>• 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. ☒ ☐</td>
</tr>
<tr>
<td>• 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. ☒ ☐</td>
</tr>
<tr>
<td>• The date and approximate time of departure. ☒ ☐</td>
</tr>
<tr>
<td>• The date and approximate time of arrival. ☒ ☐</td>
</tr>
<tr>
<td>• The transport vehicle’s make, model, and license plate number. ☒ ☐</td>
</tr>
<tr>
<td>• The identification number of each member of the delivery team accompanying the transport. ☒ ☐</td>
</tr>
<tr>
<td>• 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. ☒ ☐</td>
</tr>
<tr>
<td>• 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). ☒ ☐</td>
</tr>
<tr>
<td>• 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. ☒ ☐</td>
</tr>
<tr>
<td>• 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. ☒ ☐</td>
</tr>
</tbody>
</table>
PLEASE PROVIDE AN EXPLANATION OF ANY RESPONSES ABOVE THAT WERE ANSWERED AS A "NO" AND HOW YOU WILL MEET THESE REQUIREMENTS BY THE TIME THE DEPARTMENT DETERMINES YOU TO BE OPERATIONAL UNDER THE ACT AND REGULATIONS:

N/A

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:

REDACTED

Section 12 – Storage of Medical Marijuana

<table>
<thead>
<tr>
<th>A. Storage Requirements</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>By checking “Yes” to any statement, you affirm that the plan of operation will address the below statements: If you check &quot;No&quot; 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>• 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).</td>
<td>☑</td>
<td>□</td>
</tr>
<tr>
<td>• All storage areas will be maintained in a clean and orderly condition and free from infestation by insects, rodents, birds, and pests.</td>
<td>☑</td>
<td>□</td>
</tr>
<tr>
<td>• A separate and secure area for temporary storage of medical marijuana that is awaiting disposal will be established.</td>
<td>☑</td>
<td>□</td>
</tr>
</tbody>
</table>
Section 13 – Labeling of Medical Marijuana Products

A. Labeling Requirements

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

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

- 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.

N/A
B. PLEASE DESCRIBE YOUR PROCESS FOR CREATING AND MONITORING THE LABELING USED FOR MEDICAL MARIJUANA PRODUCTS:

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DOH REDACTED
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DOH REDACTED
### Section 14 – Inventory Management

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

<table>
<thead>
<tr>
<th>B. Inventory Management</th>
<th>Yes</th>
<th>No</th>
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</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>
<td>☑</td>
<td>□</td>
</tr>
<tr>
<td>• Medical marijuana dispensed to a patient or caregiver.</td>
<td>☑</td>
<td>□</td>
</tr>
<tr>
<td>• Damaged, defective, expired, or contaminated medical marijuana awaiting return to a grower/processor or awaiting disposal.</td>
<td>☑</td>
<td>□</td>
</tr>
<tr>
<td>• Inventory controls and procedures will be established for the conducting of monthly inventory reviews and annual comprehensive inventories of medical marijuana at the facility.</td>
<td>☑</td>
<td>□</td>
</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>
<td>☑</td>
<td>□</td>
</tr>
</tbody>
</table>

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

N/A

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:
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DOH REDACTED
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DOH REDACTED
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:

REDACTED

Section 16 – Sanitation and Safety

A. Please provide a summary of the intended sanitation and safety measures to be implemented at each
Summary
This response will summarize the intended sanitation and safety measures to be implemented at Keystone Center of Integrative Wellness’ (KCIW) proposed dispensary locations. These measures will cover, but are not limited to, a process for contamination prevention, pest protection procedures, medical marijuana handler restrictions, hand-washing facilities, and inspection schedule to ensure the accuracy of operational equipment. This response will explain how KCIW is prepared to properly carry out the activities of a dispensary, and is able to implement and maintain sanitary and safe working environments for the manufacture of medical marijuana while maintaining effective control, preventing diversion and complying with all applicable laws of this Commonwealth.

Relevant Experience

Umamaheswar Siripurapu, KWIC Director of Pharmacy Science, owns and operates an apothecary. He has extensive knowledge and experience in the safety, regulations, and sanitation requirements of a pharmacy based on the PA Code 25.11-25.34.

Mike Dymek, KCIW Pharmacist and General Manager, also has relevant and extensive experience in safety sanitation as he has held multiple positions managing a pharmacy also required to adhere to PA Code 25.11-25.34.

Emilia Slavova, KWIC Chief Nursing Officer, has relevant and extensive experience in safety, sanitation as it pertains clinical environments of various hospital and medical offices.

Chris Julias, KCIW Chief Information Officer and Director QA/QC, has extensive experience in chemical laboratory operations including the handling and storage of chemicals and solvents as well as hazardous material response training (HAZMAT).

Mary Pat Julias, Chief Marketing Officer/Chief Strategy Officer at KCIW has over 25 years of experience in food safety and sanitation. Her B.S. in Nutritional Sciences – College of Health and Human Development and M.S. in Food Science – College Health and Human Development, HACCP and ServSafe training as well as operating a consumer food testing company provides KCIW with expertise to ensure
Company Policies

It is the policy of KCIW that the safety of its employees and the public is its foremost business consideration. The prevention of accidents, injuries, and product contamination takes precedence over expedience and every attempt will be made to prevent these events from occurring. KCIW will require that all personnel, as a condition of employment, comply with all applicable safety regulations as listed in KCIW’s policy manual, and will assign a safety coordinator to be the primary contact for safety-related matters at the dispensary. All personnel will receive an orientation of the safety policy and procedures upon initial employment and are encouraged to bring to the attention of their department manager any unsafe or non-compliant conditions or practices. Supervisors will communicate these concerns to the safety coordinator, who will respond to this concern within 24 hours. Safety training will be provided as often as necessary and annually at a minimum.

To accomplish this commitment, KCIW will actively involve all personnel in establishing, maintaining and participating in an ongoing and effective sanitization and safety program.

Employer responsibilities:
- Provide a sanitary and safe workplace.
- Provide sanitization and safety and health education and training.
- Annually review and update workplace sanitization and safety rules.

Employee responsibilities:
- Report all unsanitary and unsafe conditions.
- Immediately report all work-related injuries, spills or hazards.
- Wear the required personal protective equipment.
- Abide by the company’s sanitization and safety procedures at all times.

To go above and beyond, KCIW will also implement the measures outlined in the relevant dispensary regulations developing sanitization and safety protocols. The relevant grower/process regulations are cited along with the relevant dispensary regulations below. As a general policy KCIW will not permit a patient to self-administer medical marijuana at any of its dispensaries unless the patient is also an
employee of the dispensary, and that employee would be negatively impacted by not being permitted to consume medical marijuana while at work - §1161.22(b)(3).

**Safety in the Workplace**
Sanitization and safety are paramount to KCIW’s operations and start with the dispensary itself. The dispensary will comply with all applicable state and local building code requirements and will be maintained in such a way as to limit the potential for contamination, as required by §1161.34(a)&(e).

KCIW will create an operations plan describing the procedures and equipment used for sanitization and safety of the dispensary including workplace safety, such as conducting necessary safety checks prior to starting the dispensing of medical marijuana; contamination protocols; maintenance, cleaning and sanitization of equipment in the facility and onsite; maintenance and sanitization of the site and the facility; proper handling and storage of any solvent, gas or other chemical used in the cleaning and sanitization of the dispensary in accordance with applicable laws, rules and regulations; and quality control measures for proper labeling and minimization of medical marijuana contamination, as defined by §1161.29(a)(3)-(5). Regularly required safety inspections will also be detailed along with training procedures.

KCIW’s safety procedures will ensure the implementation of best safety practices at all times, in accordance with Occupational Safety and Health Administration (OSHA) guidelines, throughout the facility. Safety procedures will include measures for ensuring workplace safety, including, at a minimum, conducting necessary safety checks prior to dispensing medical marijuana products, as outlined by §1161.29(a)(1)-(8) and (b). Safety procedures will also cover equipment requiring safety checks such as alarm systems and secured entryways.

**Recordkeeping**
Along with safety checks, safety procedures will include processes to maintain the sanitation and operation of equipment to prevent contamination and ensure proper functionality, as outlined by §1151.32(a), as necessary. These procedures will outline how KCIW will routinely calibrate, check and inspect any automatic, mechanical or electronic equipment, scales, balances or other measurement devices used in the company’s operations, as outlined by §1151.32(b)(1), as necessary. To aid in the recordkeeping process, KCIW will maintain an accurate log of when each piece of equipment is maintained, cleaned and/or calibrated in a corresponding log, as outlined by §1151.32(b)(2), as necessary.

The Maintenance Log is used to track each piece of equipment being maintained,
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the current date of service, past dates of service, damage reports, scheduled shutdowns, and whether or not the equipment is in need of replacement. The Sanitization Log is used to track each piece of equipment being sanitized, the current date of service, and all past dates of service. The Calibration Log is used to track each piece of equipment being calibrated, dates and times of service, the reason for calibration and the status of each calibration cycle (pass/fail). Whenever possible and as required, KCIW will use a third-party calibration service provider to calibrate its scales.

To ensure all equipment, surfaces and dispensary areas are cleaned and sanitized on a regular basis, remain in proper working order and are calibrated if applicable, each sanitization, maintenance and calibration procedure will outline: the name of the equipment/surface/area being sanitized, maintained or calibrated, personnel responsible for performing the procedure, tools and materials necessary for performing the corresponding cycle, any specific personal protective equipment necessary for performing the corresponding cycle, a step-by-step guide explaining how to perform the corresponding activity, any health and safety consideration that should be taken into account, related records and forms, employee competency, and the personnel responsible for updating the given procedure.

Depending on the equipment/surface/area, sanitization, maintenance, and calibration cycles may be performed independently from one another, and do not necessarily occur at the same time. Equipment/surfaces that come into constant contact with multiple batches of medical marijuana will be sanitized before and after each use to prevent cross-contamination. Some equipment, such as the scales, that are used on a regular basis will be maintained at least once a week, and at the beginning of every week. Other pieces of equipment that are used less often will be maintained at least once a month, and at the beginning of the month. At least once a month and at the end of each month each department will be completely broken down, cleaned and sanitized.

Facility Inspections
KCIW will inspect the entire dispensary quarterly to identify potential hazards using the OHSA Self-Inspection Checklist to prevent hazardous material and chemical incidents that could result in injury and/or illness to any employee. A responsible party will be assigned to correct all hazards as soon as possible. If the hazard is extreme, KCIW will terminate operations until corrected. Per OHSA recommendations, inspections will cover:

- Processing, Receiving, Shipping and Storage:
  - Equipment, job planning, layout, heights, floor loads, the projection of materials, material handling and storage methods, training for material handling
equipment.

- Building and Grounds Conditions:
  - Floors, walls, ceilings, exits, stairs, walkways, ramps, platforms, driveways, aisles.

- Housekeeping Program:
  - Waste disposal, tools, objects, materials, leakage and spillage, cleaning methods, schedules, work areas, remote areas, storage areas.

- Electricity:
  - Equipment, switches, breakers, fuses, switch-boxes, junctions, special fixtures, circuits, insulation, extensions, tools, motors, grounding, national electric code compliance.

- Lighting:
  - Type, intensity, controls, conditions, diffusion, location, glare and shadow control.

- HVAC:
  - Type, effectiveness, temperature, humidity, controls, natural and artificial ventilation and exhausting.

- Machinery:
  - Points of operation, flywheels, gears, shafts, pulleys, key ways, belts, couplings, sprockets, chains, frames, controls, lighting for tools and equipment, brakes, exhausting, feeding, oiling, adjusting, maintenance, lockout/tag out, grounding, workspace, location, purchasing standards.

- Personnel:
  - Training, including hazard identification training; experience; methods of checking machines before use; type of clothing; PPE; use of guards; tool storage; work practices; methods for cleaning, oiling, or adjusting machinery.

- Hand and Power Tools:
  - Purchasing standards, inspection, storage, repair, types, maintenance,
grounding, use, and handling.

- **Chemicals:**
  - Storage, handling, transportation, spills, disposals, amounts used, labeling, toxicity or other harmful effects, warning signs, supervision, training, protective clothing, and equipment, hazard communication requirements.

- **Fire Prevention:**
  - Extinguishers, alarms, sprinklers, smoking rules, exits, personnel assigned, separation of flammable materials and dangerous operations, explosion-proof fixtures in hazardous locations, waste disposal and training of personnel.

- **Maintenance:**
  - Provide regular and preventive maintenance on all equipment used at the worksite, recording all work performed on the machinery and by training personnel on the proper care and servicing of the equipment.

- **Personal Protective Equipment:**
  - Type, size, maintenance, repair, age, storage, assignment of responsibility, purchasing methods, standards observed, training in care and use, rules of use, and method of assignment.

- **Transportation:**
  - Motor vehicle safety, seat belts, vehicle maintenance, safe driver programs.

- **First Aid Program/Supplies:**
  - Medical care facilities locations, posted emergency phone numbers, accessible first aid kits.

- **Evacuation Plan:**
o Establish and practice procedures for an emergency evacuation, e.g., fire, chemical/biological incidents, bomb threat; include escape procedures and routes, critical plant operations, employee accounting following an evacuation, rescue and medical duties and ways to report emergencies.

**Hazardous Chemical Storage**

Safety procedures will also cover proper handling and storage of any toxic cleaning compounds, sanitizing agents, solvents and pesticide chemicals used in the cleaning and pest management of the dispensary in accordance with applicable laws, rules, and regulations, as outlined by §1151.22(a)(8). All toxic cleaning compounds, sanitizing agents, solvents and pesticide chemicals used in the cleaning and pest management of the dispensary 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 – §1161.34(a)(4). In addition, MSDS sheets for these solutions will be readily accessible on shelves where they are stored.

**Solvents**

Any solvents stored in the dispensary, will be stored in a storage cabinet in compliance with local, state and federal guidelines, and adhere to OSHA standards in regards to the quantity of solvent onsite and proper storage containers. Flammable liquids stored in the dispensary area will never exceed 10 quarts at any given time, and total flammable liquids stored onsite or in a single storage cabinet will never exceed 60 gallons at any given time. Solvents will be stored in containers compliant with OSHA 1910.106(d)(2) and storage cabinets compliant with OSHA 1910.106(d)(3).

**Chemicals**

Employees will follow all applicable handling and storage protocols as defined in the Material Safety Data Sheet for any chemicals and sanitizer solutions used in the dispensary.

It is established that requirements of OSHA’s Hazard Communication standard will be met, and department managers are assigned responsibility for conducting job-specific hazard training on chemicals used by their employees. After attending training, each employee will sign a form to verify that they attended the training and understand company policies on hazard communication. Copies of Material Safety Data Sheets (MSDS) for all hazardous chemicals to which employees may be exposed will be available by hard copy in each chemical area of the department in a designated MSDS binder.
Safety Rules
Safety rules are provided as guidelines for safe operations. All employees will be given a copy of the safety rules upon initial employment and must sign and return the acknowledgment form after they have reviewed the safety rules and ask any questions. The safety rules will be periodically reviewed by the Director of Safety/Maintenance to ensure they are applicable and current. Safety rules include those relevant to accident and hazard reporting, drug and alcohol use, driving, work-related injuries and the required use of personal protective equipment. Enforcement measures and disciplinary actions detailed are to be implemented in response to safety rule violations established herein. All emergency situations including chemical spill response will be handled by local emergency response agencies. Additional measures serve to establish procedures for injury claims and policies related to workers’ compensation and benefits provided. These safety rules are designed to provide employees with knowledge of the recognized and established safe practices and procedures that apply to many of the work situations encountered while employed. Employees are responsible for consulting their department manager for guidance if in doubt about the safety of any condition, practice or procedure.

Accident reporting: all accidents or near misses will be reported to department managers immediately. Falsification of company records, including employment applications, time records or safety documentation, will not be tolerated.

Hazard reporting: Notify a department manager immediately of any unsafe condition and/or practice.

Alcohol or illegal drugs: no illegal drugs or alcohol will be allowed on the worksite. Employees will notify their department manager if they are taking any prescription drugs that might affect their judgment. Coming to work intoxicated will not be tolerated and the offending employee can be subject to immediate termination.

Driving: while driving a KCIW vehicle or driving your own vehicle for company business, employees must obey all traffic laws and signs at all times.

Lifting: when required to lift an item, always seek mechanical means (forklift, lift table, pallet jack, etc.) first. If an item must be lifted manually, please refer to the detailed lifting safety rules before performing the task. All motorized operated equipment will be tested/inspected prior to use. All personnel or contractor operating of the equipment must be certified prior to operating.

Falls: when working above a lower level (4 feet in general industry, 6 feet in
construction) with unprotected sides, edges or openings, employees will protect themselves by use of guardrails or an approved personal fall-arrest system (e.g., lanyard, fall protection harness, anchor point). Each fall-arrest system Anchor point must be rated per OSHA guidelines.

**Personal protective equipment (PPE):** Appropriate PPE must be worn at all times. Wear approved eye and face protection when performing any task that could generate flying debris. When working with chemicals, wear protective eyewear and gloves. Wear gloves when handling metal, rough wood, fiberglass and other sharp objects. Wear a hard hat when there are overhead hazards. When working with any Electrical equipment FR gear will be required per (NFPA 70E regulations). All contractor and personnel will be required to have training prior to working with Electrical equipment. This training will be required every 3 years or when new regulations are released.

Other safety rules:

- Do not stand on furniture to reach high places; always use a ladder or step stool.
- Use handrails when ascending or descending stairs or ramps.
- Close all drawers to file cabinets after use to prevent tripping or bumping hazards.
- Keep floor clear of water by mopping as necessary.
- Wear appropriate PPE when using cleaning agents.
- Ensure all exhaust equipment is operational prior to beginning work.

**Violation of Safety Rules**

Employees will be subject to disciplinary action for violations of safety rules. Employees will be afforded instructive counseling and/or training to ensure a clear understanding of the infraction and the proper conduct under organizational guidelines. All training will be documented in a safety rule violation notice form and placed in the employee’s personnel file. Nothing in this policy or this safety program will preclude management from terminating an employee for a safety violation. This is not a progressive discipline system and any safety violation may lead to an employee’s termination without prior instruction or warning.

Management reserves the right to impose any of the following disciplinary actions it
deems appropriate:

• Verbal warning with documentation in personnel file.
• Written warning outlining nature of the offense and necessary corrective action with documentation in personnel file.
• Termination.

Management, including department managers, shall be subject to the above disciplinary action for the following reasons:

• Repeated safety rule violations by employees under their supervision.
• Failure to provide adequate training prior to job assignment.
• Failure to report accidents and provide medical attention to employees injured at work.
• Failure to control unsafe conditions or work practices.
• Failure to maintain sanitation standards and cleanliness in their departments.

Injury Claims

• All employees will be provided with an explanation of the workers’ compensation system and the benefits it will provide to them by their department manager.

• In the event of a work-related injury or illness, the injured employee must report the event to his/her department manager or the safety coordinator before the end of the work shift.

• If the injured employee needs immediate medical attention, he/she will be driven or sent to the nearest appropriate hospital or clinic.

• Drug and Alcohol testing must be completed at the time of injury if medical attention is required.

• If the injury is not an emergency, an appointment will be made with one of the worker’s compensation provider’s designated medical providers as soon as possible.

• Once a department manager has been notified of an injury, the department manager will provide a list of designated providers and written instructions, and will have the employee sign and date this written instruction. A copy of the signed written
instructions will be given to the employee and kept in his/her personnel file.

- A management accident investigation will be conducted following all work-related injuries. The department manager or safety coordinator will be responsible for interviewing the injured employee and all witnesses.

- The safety coordinator will report the claim to the worker’s compensation provider.

- If the incident involved an employee death or a catastrophe (3 or more employees admitted to the hospital) OSHA (1.800.321.6742) must be notified within eight hours, along with the Pennsylvania Department of Worker’s Compensation.

- The safety coordinator will use information from the accident investigation to identify changes that may help prevent future incidents.

- For lost time claims, the KCIW will contact the injured employee at least once a week to answer questions, keep the injured employee informed of organization activities, and discuss return to work options.

- The safety coordinator will contact the medical provider after each appointment to keep current on the employees work status, medical progress, and to ensure that appointments are being kept.

**Modified duty procedures will be as follows:**

- Department managers will determine if an employee can return to his/her regular job duties and evaluate the medical restrictions.

- If an employee is unable to return to normal job duties, the department manager will determine if the employee’s position can be temporarily modified to accommodate the restrictions.

- If the job cannot be modified, the safety coordinator will evaluate other tasks or positions the employee may be able to perform until the medical restrictions are lifted.

- If an employee is unable to return safely to a modified position, the medical restrictions will be re-evaluated after each doctor’s visit to ensure the employee is returned to work as soon as possible.

- An entry will be made in an OSHA 300 Log for all cases involving medical treatment for employers with more than 10 employees.
• Accurate records will be kept for all workers’ compensation claims. This file will document all communications regarding the claim and all records from the medical providers and worker’s compensation provider.

“Right to Know”
KCWI is committed to eliminating hazardous materials and chemical incidents that could result in injury and/or illness to any employee. OSHA Hazard Communication standard (29 CFR 1910.1200) is based on the simple concept that employees have both a need and a “right to know” the identities and hazards of any chemicals they work with during the course of their employment. Employees also need to know what protective measures are available to prevent chemical exposures and how to avoid adverse health effects. KCWI’s hazard communication program will meet these requirements and will be available upon request for review by all personnel.

KCWI will ensure that all containers within its facility have a complete label and that a copy of the original manufacturer’s label will be made and placed on any secondary container, or at minimum the product’s name, all hazard warnings (corrosive, flammable, skin irritant, etc.) and the manufacturer’s name and address will be placed on the container in permanent ink.

Copies of MSDSs for all hazardous chemicals to which employees may be exposed will be available by hard copy in each chemical area of the department in a binder designated “MSDS Sheets”. Employees are encouraged to read MSDSs for the chemicals they use. MSDSs will be available to all employees during all shifts. If an MSDS is missing, or if a new product arrives without an MSDS, immediately inform the department manager so they can acquire the MSDS.

Training
Prior to starting work, each new employee will attend a health and safety orientation and will receive information and training on the following:

• An overview of the requirements contained in OSHA’s HAZCOM standard: 29 CFR 1910.1200.
• Chemicals present onsite.
• Location and availability of written hazard program.
• Physical hazards and health effects of any hazardous chemicals.
• Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
• How to reduce or prevent exposure to these hazardous chemicals by using engineering controls, work practices, and personal protective equipment.
• Steps that were taken to reduce or prevent exposure to these chemicals.
• Emergency procedures to follow if an employee is exposed to chemicals.
• How to read labels and review MSDSs to obtain appropriate hazard information.

Training updates will be provided at the time of initial assignment to tasks where occupational exposure to a hazardous chemical may take place. Training will be repeated whenever a new chemical or a new hazard is introduced into the work area.

**Approved Products List**

Department managers will maintain a list of all the chemicals and products used within their department. This list is kept in the front of the MSDS book. Each chemical entry on the inventory list has a corresponding MSDS available for providing specific hazard information and personal protective measures. This list must be updated quarterly to remove chemicals that are no longer in use and to add new products. Occasionally, an employee may be asked to perform a task that is not part of their normal job. Before taking on a new task, the affected employee will be given information by their supervisor about any hazardous chemicals that might be used during the activity. This information will include:

• Specific chemical hazards;
• Protective measures employees can take; and
• Measures taken to reduce the hazards, which might include ventilation, personal protective equipment, use of the buddy system, and emergency procedures.

Department managers are also responsible for identifying and obtaining MSDSs for chemicals any contractors may bring into the facility and for providing contractors with the following information:

• Hazardous chemicals to which they may be exposed while onsite and the procedure for obtaining MSDSs;
• Precautions contracted employees may take to reduce the possibility of exposure by using appropriate protective measures; and
An explanation of the company’s labeling system.

**Contamination and Pest Management**
Sanitization procedures will cover contamination prevention and pest protection protocols throughout the facility. As required by §1161.33(a), KCIW will have a separate, locked, limited-access area for 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, to be disposed of as required under §1151.40. Along with this prevention measure, all equipment and surfaces, including floors, counters, walls, and ceilings, will be cleaned and sanitized before and after each use to protect against contamination, using a sanitizing agent registered by the United States Environmental Protection Agency, in accordance with the instructions printed on the label. All equipment and utensils used in a dispensary will be designed and of such material and workmanship as to be capable of being adequately and easily cleaned, as outlined by §1151.33(a)(1), and equipment and surfaces will be made of NSF or FDA approved contact materials, such as stainless steel, polyethylene(s), polypropylene(s), glass or other food- or pharmaceutical-grade material, and will not react adversely with any solvent/chemical being used – §1151.33(a)(4). Contamination prevention protocols will ensure all waste is properly removed and disposed of in accordance with §1151.40 and state law and regulations, and all floors, walls, and ceilings are kept in good repair – §1161.34(a)(1)&(2).

In accordance with §1161.34(a)(3), pest protection protocols will adequately protect against pests through the use of integrated pest management practices and techniques that identify and manage pest problems, and through the regular disposal of trash to prevent infestation. All dispensing and storage areas will be maintained in a clean and orderly condition and free from infestation by insects, rodents, birds and pest of any kind – §1151.31(b). In addition, a professional pest management company will be contracted after proper security clearances have been obtained.

**Product Handling**
Sanitization procedures will also cover medical marijuana handler restrictions, handwashing facilities, and lavatory access. KCIW will require all employees working in direct contact with medical marijuana to comply with all food handler restrictions in §27.153 and to conform to KCIW sanitary practices while on duty, such as maintaining adequate personal hygiene, wearing proper clothing, including gloves, and washing hands thoroughly in an adequate handwashing area before starting...
work and at any other time when hands may have become soiled or contaminated — §1161.34(b). KCIW will provide its employees and visitors with adequate and convenient handwashing facilities furnished with running water at a temperature suitable for sanitizing hands, effective nontoxic sanitizing cleaners and sanitary towels or suitable drying devices located in processing areas and where good sanitary practices require personnel to wash and sanitize their hands, as well as provide adequate, readily accessible lavatories that are maintained in a sanitary condition and in good repair — §1161.34(c)&(d).

**Quality Control**

Quality Assurance and Quality Control (QA&QC) measures for proper labeling and minimization of medical marijuana contamination are an essential tool and will enable KCIW to provide patients/consumers with the peace of mind they deserve when using medical marijuana products. QA&QC plans will be developed that include:

- Plans to detect, identify and prevent dispensing errors.
- Policies and procedures to document and investigate product returns, complaints, and adverse events.
- Provide for proactive, rapid voluntary or involuntary recalls of any lot of medical marijuana product where a recall is indicated.

These QA&QC plans will also include policies and procedures that cover:

- A plan for storage and return to the grower/processor of medical marijuana that has been damaged, expired, deteriorated, mislabeled, contaminated, recalled, or whose containers or packaging have been opened or breached.
- A plan that ensures that all adverse events and total recalls are reported to the Department within 24 hours of their occurrence.
- Tracking contamination incidents and documenting the investigated source of such incidents, as well as the appropriate corrective action(s) taken.

**Hazard Analysis Critical Control Point**

Hazard Analysis Critical Control Point (HACCP) programs will be instituted to maintain product safety. HACCP is a management system, developed by the Food and Drug Administration, in which food safety is addressed through the analysis and control of biological, chemical, and physical hazards from raw material production, procurement, and handling, to manufacturing, distribution and consumption of the finished product. For the dispensing of medical marijuana, the HACCP program will
focus on controlling biological (e.g. microbiological organisms and toxins) and chemical (e.g. cleaning solutions, solvents, and reagents) contamination and physical hazards (e.g. faulty or defective packaging and foreign matter). Biological and chemical contamination and physical hazards of concern and their mitigation will be specifically addressed in KCIW’s operations plan, as well as in the company’s sanitization and QA&QC procedures.

All equipment used in the dispensing of medical marijuana will be cleaned and sanitized before and after each use. All items used in the packaging and storage of medical marijuana products will also be cleaned and sanitized prior to use. Further, all product packaging will be inspected upon receiving and again prior to use - defective or faulty packaging materials will be disposed of immediately. Foreign matter, such as hair, dirt, debris, saliva and other bodily fluids, will be controlled/mitigated using proper PPE, like hairnets, facemasks and gloves. Through the use of HACCP programs, KCIW will ensure that all pieces of equipment, work surfaces, and packaging materials are free of biological and chemical contamination, as well as physical hazards, and are safe for use.

The QA&QC procedures will ensure all medical marijuana distributed by KCIW is tested for contaminants and cannabinoid profile in compliance with testing guidelines published by the Department, and that the results of all testing are maintained for more than one year. The QA&QC procedures will ensure all medical marijuana is dispensed in a safe and sanitary manner.

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:

Summary

The Keystone Center of Integrative Wellness (KCIW) dispensary record-keeping plan will comply with the Rules and Regulations of the Department of Health and incorporate the best practices of the medical marijuana and comparable industries. Several regulations apply to record keeping functions, specifically 1161.32 (a)–(c), referencing §1141.45 (inspection and investigation), §11.41.46 (reports), §1161.23 (dispensing medical marijuana), §1161.24 (limitations on dispensing), §1161.28 (labels and safety inserts), §1161.29 (plans of operation), §1161.30 (visitor access...
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

KCIW’s record keeping policies and procedures demonstrate not only compliance with the Commonwealth requirements but also a commitment to full and transparent documentation of its operations. All employees will be required to attend a training session that will instruct such employees on the regulations set forth by the department specific to patient record filing and system requirements and HIPPA. After the training, employees will be required to sign a statement stating that they fully understand regulations, agree to be compliant and fully understand the repercussions of failure to follow the regulations.

Relevant Experience
KCIW will benefit from the years of regulatory compliance experience from its Compliance Officer, Debra Altland. Ms. Altland has over 10 years of experience in the implementation and enforcement of compliance and record keeping. Debra was the Director of Home Care for MedStaffers, and while performing her duties, Debra ensured that all patient and employee charts met and exceeded state regulations and requirements. She consistently ensured that the processes, policies, and procedures for the agencies with whom she worked to oversee were effective. If regulations changed Debra ensured that the companies and her staff were always up to date on the changes, and immediately put policies and procedures into effect to ensure that these updates and changes were being implemented. Debra moved from MedStaffers to become the Director of Service Coordination for Alma Health Skilled Services, LLC. She immediately put into place a plan to perform quarterly chart audits for all consumers who were being served under Service Coordination. This procedural dedication resulted in a deficiency-free QMET audit, the first ever in the state of Pennsylvania for Service Coordinators. She was then named the Chief Operating Officer of the Service Coordination and Home Health divisions. Under her tireless efforts, she brought both divisions into compliance, and set forth official protocols to ensure that the company continued to meet, and exceed all Department of Health, Medicare, and ACHC standards.

Over the past two decades MedStaffers and Alma Health have successfully completed all mandatory local, state and federal regulatory audits in an industry that driven by regular tests for compliance. These audits are conducted on annual or bi-annual basis by various county, state and Federal departments which include, but are not limited to, The Department of Health, Departments of Office of Long
Term Living, The Department of Human Services, CMS, ACHC and the Area Departments of Aging, all of which have or focus on different regulations, which are subject to review and update with little to no notice.

The owners of MedStaffers and Alma Health have put in place a staff, and placed to direct those staff, people who have the full understanding of these regulations and the passion to meet or exceed them. Over the course of a combined 20 years of serving communities statewide, both companies have never received a score below a 95% rating. Alma Health Skilled Services was the recipient of the first ever (and still only) company in the state of Pennsylvania to score a 100% compliance rating during their 2016 QMET audit.

The ownership has placed this emphasis on compliance, and ensured that all staffers in Management, Compliance and record keeping positions share their passion and dedication. Understanding of all requirements and regulations, and the implications they carry into day to day operation of service coordination and home health care, must be comprehensive, to ensure that patient and employee charts meet and exceed state regulations and requirements. We have consistently ensured that all the processes, policies, and procedures exceed standards.

Regulations change on a daily basis with all the departments mentioned above. This can be very trying but with our experienced staff in place, we are able to sustain compliance in all departments. We have worked tirelessly to ensure compliance, and have gone above and beyond to set forth protocols to ensure that the company will continue to meet and exceed Department of Health, Medicare, and ACHC standards.

KWIC's Compliance Officer and General Manager will collaboratively develop KCIW's recordkeeping standard operating procedures (SOPs), employee training program and implementation, ongoing compliance reviews, and randomized audit protocols. In the event that a discrepancy is noted with regards to recordkeeping, the General Manager will work with the Compliance Officer on appropriate employee retraining, reviews and modifications to SOPs, reporting to the Department and local/state law enforcement (whenever appropriate), and strategic planning with regards to mitigating and eradicating any compliance violations.

**Company Policies**

KCIW will ensure compliance with all laws and regulations pertaining to its operation as a licensed organization including recordkeeping. However, the operational needs of the company require records in excess of the mandated
requirements; therefore, KCIW’s recordkeeping policies and procedures as
detailed in this section will cover, but are not limited to, employee files, patient
records, records of inventory and all dispensing transactions. KCIW has adopted
procedures for maintaining records that conform to the Department, medical
marijuana regulations and best practices for the pharmaceutical sectors.

**General - Recordkeeping**

KCIW will implement an operations plan detailing its procedures and equipment for
recording and upkeep of company employee policies and procedures, security
policies and protocols, day-to-day operations, workplace safety, maintenance,
cleaning and sanitation of the dispensary, inventory management and reporting,
complaints and recall procedures, and electronic tracking system interface in
accordance with applicable laws, rules and regulations – §1161.29(a)(1)-(8).
KCIW’s recordkeeping plan will outline operational procedures in compliance with
State law and regulations and will be available upon the Department’s request.
The General Manager or an authorized employee will be assigned responsibility
for oversight of all recordkeeping activities and for implementing and enforcing the
contained policies and procedures.

The company will maintain, at a minimum, the following categories of
records:

1. Standard operating procedures;
2. Inventory records including the electronic tracking system;
3. Confidential patient information;
4. Patient profiles;
5. Dispensing history;
6. All dispensed medical marijuana products and periods of no-fill (zero
   report);
7. Dispensing errors;
8. Allergy and adverse event reporting; and
9. Medical marijuana product recalls.

**Additional recordkeeping requirements by the company include:**

- Employee records and policies.
- Waste disposal records.
- Maintenance records.
- Company assets and liabilities.
- Fixed asset schedules.
- Insurance and escrow requirements.
- All monetary transactions.
- Books of accounts including journals, ledgers and supporting documents,
  agreements, checks, invoices, vouchers, monthly and quarterly reports and annual
audits.

• Sales records.
• Medical marijuana purchased and pricing records.
• Salary and wages paid to each employee.
• Stipend paid to upper management and any executive compensation, bonus, benefit or item of value paid to any individual affiliated with the company.

KCIW will document and retrieve recordkeeping information using the Department’s approved electronic tracking system with both on- and off-site storage that provides sufficient backup capabilities. KCIW will maintain the dispensary data in its electronic tracking system comprised of the required hardware, data storage equipment and software for all operating functions.

The General Manager will maintain records of any maintenance, cleaning, sanitizing and inspection in the facility. KCIW is committed to compliance with all laws and regulations about its operation as a registered organization. Management will make all records available to the Department or its authorized representatives upon request for monitoring, on-site inspection and audit purposes. In the event of a closure, the company will implement the codified organizational procedures and actions to store and make available to the Department all records required to be maintained for a recommended period of four years.

Complying with Inspections

The Department is at liberty to conduct announced or unannounced inspections or investigations of KCIW’s books, records, papers, documents, data, and other physical or electronic information – §1141.45(a)&(b)(1). To comply with these regulations, KCIW will ensure all documentation requested by the Department including all corporate documents required by law, such as meeting minutes, annual reports, stock or membership agreements will be made available. The Compliance Officer is responsible for recordkeeping, data retention and backups to ensure the company maintains true, complete and accurate records in accordance with the Department regulations.

During an inspection or investigation, KCIW will provide copies and free access to all company books, records, papers, documents, data, and physical or electronic information that relates to the company’s dispensary operations, including:

• Financial data.
• Sales data.
• Shipping data.
• Pricing data.
• Employee data. §1141.45(c)

All employees must adhere to recordkeeping policies and procedures unique to their role and responsibility as a condition of employment.

KCIW understands that failure to cooperate with the Department or its authorized agents or law enforcement during an inspection or investigation into requested documents, physical or electronic information, or individual may result in the imposition of a civil monetary penalty, suspension or revocation of its permit, or an immediate cessation of operations pursuant to a cease and desist order issued by the Department – §1141.45(d). KCIW will maintain strict control over records to provide required data to the Department, management, information to advisors and board members, document operations for third-party certifiers or auditors and to keep a record of operations in case of any insurance claims or legal or administrative investigation.

Reports
KCIW will submit reports summarizing the amount of medical marijuana purchased by the company during the period for which the report is being submitted, the per-dose price of any amount of medical marijuana purchased by KCIW from any grower/processor, and the per-dose price of any amount of medical marijuana dispensed to any patient or caregiver to the Department, on forms prescribed by the Department, at the end of the first 12-month operational period, and every 3-month period thereafter – §1141.46(a)(2). KCIW will make available any operational and financial information necessary for ongoing reporting or for the Department to carry out its responsibilities under the Act and §1141.46(d). The electronic tracking system will be used to produce the reports upon request disclosing: medical marijuana received from a grower/processor; medical marijuana products in inventory by location, if applicable; medical marijuana dispensed to each patient/caregiver; damaged, defective, expired, contaminated, returned, withdrawn or recalled products; medical marijuana waste awaiting disposal; and an audit trail of all inventory adjustments. The Compliance Officer is also responsible for the proper integration of these requirements into policies and procedures. Backups of all records will be maintained for a recommended four years.

In addition to KCIW’s legal obligation to protect patient information, it has a responsibility to the stakeholders and the Department to accurately document the activities of the business. True and correct reports maintained in a timely and
organized manner also provide real-time operating information for making quick and informed decisions in the normal course of business. KCIW will keep and maintain the following reports:

- A “total inventory in storage” report by location and batch that records user, date, time, item, quantity and storage access in chronological order.
- An “all events” report that provides detail on all user activity and transaction types within a time frame that’s tailored to specific data requirements, such as individual items or users.
- A “review send” report that provides detailed information regarding the removal of medical marijuana and medical marijuana product from the storage area, specifying the user, time, date, item, quantity and intended destination.
- A “purchase history” report will also be maintained, to help trend the receipt of medical marijuana products in and out of inventory and monitor purchase patterns by the company and registered patients and caregivers.

**Employee and Payroll Data**

KCIW will maintain records documenting the salary and wages paid to each employee, the stipend paid to each executive manager and any executive compensation, bonus, benefit or item of value paid to any individual affiliated with the company, including executive managers. These confidential records must be maintained for a recommended period of at least seven years or longer if required by law.

**Standard Operating Procedures**

KCIW will maintain a detailed description of plans, procedures and systems adopted and maintained for tracking, recordkeeping, record retention and surveillance systems, relating to all medical marijuana at every stage including delivery, transporting, distributing, sale and dispensing by each proposed dispensary. KCIW will maintain records required for a period of four years and make these records available to the Department upon request.

**Dispensed Medical Marijuana Data**

KCIW will collect information regarding any recommendations, requirements and/or limitations as to the form or dosage of medical marijuana for each patient in a patient file – §1161.23(b). KCIW will maintain and update each patient’s certification information on record with any recommendation as to the form or dosage of medical marijuana in the electronic tracking system at each of its dispensaries – §1161.23(b)(2)(iii).

KCIW will also maintain a record of the medical marijuana dispensed to a patient
or caregiver in its electronic tracking system – §1161.32(a)(2). The General Manager will ensure that patient records are only accessed by authorized employees to maintain or update patient certification information. This will protect the patient from loss, damage or unauthorized use of their filed certification, and will be maintained for a minimum of four years as required by the Department after the date on which the patient last visited the dispensary. The General Manager will ensure that established safeguards prevent unauthorized access are used and that the date and time of an entry in a patient record are recorded automatically with a synchronized internal clock.

Prior to completing any transaction, a Dispensary Assistant will prepare a receipt of the transaction to the patient or caregiver, and file the receipt information utilizing the electronic tracking system. The receipt information will include:

- The name, address and any permit number assigned to the dispensary by the Department.
- The name and address of the patient and, if applicable, the patient's caregiver.
- The date the medical marijuana was dispensed.
- 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 form and the quantity of medical marijuana dispensed. §1161.23(c)(1)-(5)

This data will be used to prevent KCIW's dispensaries from dispensing more than a 30-day supply of medical marijuana to any patient or caregiver, until the patient has exhausted all but a 7-day supply - §1161.24(b). The General Manager, under direction from the Compliance Officer will ensure all paper and digital copies of any patient certification are destroyed after the transaction has been filed in the electronic tracking system, except as provided in 35 P.S. §§ 10231.2001-2003 of the Act – §1161.23(d).
Cycle Count Data

KCIW will establish inventory controls and procedures at each of its dispensary locations to conduct monthly inventory reviews of batches of medical marijuana and comprehensive inventories of these items on an annual basis – §1161.32(b). Data regarding each batch of medical marijuana received from a grower/processor, partially or completely distributed, stored for future sale or disposal and the name of any patient or caregiver who received product from any respective batch will also be collected and reviewed to (1) aid in the company’s anti-diversion practices, (2) help prevent dispensing errors and analyze usage trends to identify problematic usage or misuse of products by registered patients, (3) assist with tracking product complaints and withdrawals and recalls, and (4) streamlining product ordering, demand estimation, inventory management and analysis of medical marijuana product success rates corresponding to the 17 approved indications. All counts will be recorded in the inventory log and entered into the electronic tracking system immediately upon completion.

Cycle Count Data Metrics:

- Shift counts – medical marijuana in sales area, as well as cash drawer
count and detailed report on cash.
- Daily counts – medical marijuana in sales area.
- Weekly counts – all medical marijuana products in storage.
- Monthly counts – complete inventory.
- Quarterly counts – complete inventory with a second count.
- Annual counts - complete inventory with a second count witnessed by an authorized supervisor.

Disposal Data
KCIW General Manager will coordinate the transfer of returned, damaged, defective, expired or contaminated medical marijuana back to the grower/processor from whom it was purchased – §1161.38(c)
Visitation Records
As required by § 1161.30 (visitor access to dispensary facilities) (e) The following apply regarding the visitor log required under subsections (c) and (d): (1) The dispensary shall maintain the log for four 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 their official functions and duties. KCW will maintain a detailed description of plans, procedures and systems adopted and maintained for tracking, record keeping (including visitor logs), record retention and surveillance systems, relating to all medical marijuana at every stage including shipping and receiving, distributing, sale and dispensing by its proposed dispensaries. KCW will maintain records required for a period of four years and will make these records available to the Department upon request.

Record Retention
As required by §1161.31(b)(5)(i), within two business days following a request, KCW will provide up to four screen captures 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. §1161.31(b)(5)(ii). If a KCW has been notified in writing of a pending criminal or administrative investigation for which a recording may contain relevant information, KCW will retain an unaltered copy of the recording for four years or until the investigation or proceeding is closed or the entity conducting the investigation or proceeding notifies the company that it is not necessary to retain the recording.
KCIW will also maintain a secure backup of its surveillance system's digital repository and all electronic records off-site, as required by the Department – §1161.31(a)(4)(ii)(e).

The General Manager must ensure data including recordings from all video cameras are available for immediate viewing by the authorities for the time period required by Department regulations. KCIW's policy is to retain data and these recordings for a minimum of 4 years on-site and off-site as necessary per Department regulations. The General Manager in coordination with the Chief Security Officer must ensure the proper retention of all surveillance footage data.

Digital Records
Data and video recordings will not be destroyed or altered and retained as long as necessary if the company is aware of a pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information. KCIW will maintain all records (paper and electronic) in a secure location so as to prevent theft, loss, destruction or alterations. A current list of authorized employees and service personnel that have access to the surveillance room will be maintained at each dispensary and enforced by the General Manager and Chief Security Officer. Records of security tapes will be maintained for the required four years and will be made available to the Department upon request.
Unauthorized Alteration of Records
Any loss or unauthorized alteration of company records discovered or suspected by any employee must be reported to the General Manager immediately. The General Manager will report such incidents to the Department and law enforcement as necessary. Upon discovery of a records security breach, the General Manager must review all recordkeeping and security policies to identify deficiencies and necessary corrective measures. Incident reporting must be documented by the General Manager and reported immediately to upper management, in accordance with company reporting and notifications policies and procedures. Anyone with knowledge or a reasonable suspicion of an incident will be instructed to make an immediate report to the General Manager and record the incident in the incident log. All incident activities, from receipt of the initial report through post-incident review, are to be documented and recorded in the electronic tracking system. The General Manager and Chief Security Officer are responsible for ensuring all events are recorded, assembling these records in preparation and performance of the post-incident review and ensuring all records are preserved for inspection.

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

SECTION 18 – ORGANIZATIONAL STRUCTURE

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| Applicant's Organization Documents |

| Applicant’s Identification Numbers |

100
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.  ☒ Yes ☐ No

SECTION 19 – BUSINESS HISTORY AND CAPACITY TO OPERATE

DESCRIBE YOUR BUSINESS HISTORY AND YOUR ABILITY AND PLAN TO MAINTAIN A SUCCESSFUL AND FINANCIALLY SUSTAINABLE OPERATION:

Capacity to Operate & Business Acumen

Introduction
All patients are unique. From that simple observation the principal and associate team members at the Keystone Center of Integrative Wellness (KCIW) have dedicated themselves to executing an iterative process of discovery, and feedback. The goal is to achieve optimal outcomes in our:
- Approach to patient care;
- Maximizing patient outcomes;
- Recording and identifying product efficacy;
- Providing feedback about results (stripped of HIPPA-violating details) back to processors and growers;

with the expectation that processors can in turn develop a broader range of products which have higher yield outcomes. The end result is improved and varied options for the many conditions treatable by medicinal marijuana.

The purpose of this narrative is two-fold: first, to identify key team members who will bring their industry-specific experience and expertise in areas ranging from compliant handling of controlled substances, to waste disposal, dispensing, record keeping, and inventory management, with unwavering attention paid to HIPPA and all relevant State and Federal agency guidelines; and second, to document the principals’ successful business acumen.

The experience we have, and the team members we have chosen to diversify and strengthen our skill-set, give us the capabilities we need to meet an aggressive but achievable 6 month launch window.
Prior Professional Experience in the Controlled Substance Industry

The principals at KCIW are Christopher and Mary Pat Julias and Aaron and Krista Krebs; The Juliases and Krebs are all life-long Pennsylvania residents, having completed their educations, and raised their families, within the Commonwealth. They have deep connections to the state, their families and their communities, and have established roots – starting businesses and raising families - and **immersed** themselves and their children with a dedication, duty and commitment to give back to their communities.

Together they have assembled a team of highly skilled professionals who in addition to dispensary expertise have experience in the security, managing, distribution, quality control and testing of control substances. Their core team members include:

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**Director of Pharmacy Science, Umamaheswar Siripurapu (“Sam”)**

Umamaheswar Siripurapu (“Sam”) brings 10+ years of hands on pharmacy dispensing and management experience, and will use this experience to ensure the KCIW is able to successfully serve the needs of Pennsylvania’s medical marijuana patient population.

**Pharmacist, Michael Dymek**

Michael Dymek adds 20+ years of pharmaceutical experience to our staff. He has expertise in consulting and coordinating with physicians, insurance companies, and patients to ensure patients and caregivers receive accurate education on proper medication dosing, drug interactions, side effects of note and symptom and disease management. He manages ancillary staff to dispense and fulfill compound prescriptions, maintaining accurate patient records to include dosing information and directions for use.

**Director of Nursing, Emilia Slavova**

Emilia Slavova has over 25 years of academic and field expertise in multiple nursing disciplines. In the last 15 years, since obtaining her second Masters degree (in Speech Pathology; her first being in Electronics), she has:

**Chemist/Director of Quality Assurance and Quality Control, Christopher Julias**

Mr. Julias is, in addition to being one of the four principals (and CIO) at KCIW, also
the possessor of over two decades of experience handling controlled substances. From the earliest points in his career, as a Chemist at Wyeth Pharmaceuticals (subsequently purchased and now part of Pfizer), he handled, transported, and tested and validated the composition and purity of Schedule II injectables to ensure they were within manufacturing specifications.

The Principals
The Krebs and Juliases own and operate multiple businesses headquartered in the Commonwealth of Pennsylvania, which have demonstrated consistent growth and a history of exceeding expectations – including in the form of superlative audit results from government agencies (including the Pennsylvania Department of Health) and financial growth beyond industry norms. Major themes contributing to their successes have been the drive to diversify, and the ability to identify areas of need and employ talented, experienced team members who have the skill sets and shared vision required to fill them.

The Krebs
Business Summary
The Krebs own and operate several successful businesses, the oldest having been formed twelve years ago. Drawing from both their own personal experiences with devastating illnesses, and those of friends and family dealing with their own life-altering conditions, or simply the effects of aging, they have dedicated themselves to educating, caring for, and empowering people to improve their quality of life and regain their dignity.

Out of that mission, Alma Health LLC d/b/a MedStaffers was formed in 2005 as a medical staffing company, with the vision of providing compassionate care, augmented with an educational process to benefit their clients. From a business standpoint, given the sometimes mercurial nature of the health care industry, developing as broad a base of differing types of care was a corporate mission as well. The company initially provided temporary medical staff to 65 hospitals, nursing homes and various other organizations, until 2008 when the economy retreated.

However, as it became clear that other areas of health care were in similar need of a compassionate, consumer-advocate provider, they had begun a home health care division in 2006. As a consequence of this diversification and broadening of offered services, despite the nearly complete economic cutbacks by facilities of 2008, the company was still able to break even, as home health care revenue offset the fading facility staffing numbers entirely.

By 2012, MedStaffers broadened their scope further, almost doubling the number of contracts with various Area Agencies of Aging within the state. They also began to provide service coordination under the Office of Long Term Living Waiver for Home and Community Based Supports Services.
Alma Health Skilled Services became a separate entity in 2013, due to the conflict of interest requirements under OLTL. Its purview encompassed all service coordination services. Mr. Krebs serves as President and CEO, and Debra Altland, a compliance specialist is COO in charge of day to day operations. Within 3 years, under Ms. Altland’s very diligent and careful guidance, the company grew from 2 service coordinators to 55 SCs managing 1700 clients, from 6 offices throughout the 67 counties of the Commonwealth. This was achieved by combining successful demonstration of performance – excellent audit results and client satisfaction surveys supporting her customers-and-regulations-first policies - with identification and careful vetting of prospective staff additions to ensure they shared our firm beliefs in how things must be done – to the letter of the regulation, but with compassion.

*Alma Health Skilled Services* has continued the policy of diversification and stringent adherence to rules and regulations, and consequently Ms. Altland’s efforts have resulted in Medicare certifications, ACHC accreditation, a skilled nursing license division, all while doubling the size of the coordination staff to meet the growing demand of client referrals that were seeking out Alma Health Skilled Services to be their service coordinator agency.

This growing demand is the direct result of Ms. Altland’s diligent adherence to an audit-friendly mantra: “*Document, document, document – and log, log, log.*” Consequently, in a world of very stringent and exacting Medicaid and Medicare regulations, Alma Health Skilled Services has achieved the honor of being the very first service coordination company in Pennsylvania to receive zero plans of corrections since the inception of the Home and Community Based Services Program.

In parallel, MedStaffers has added a minimal 12% growth each year since the split, obtaining a nursing license, and Joint Commission of Accreditation for Hospital Organizations (JCAHO) accreditation, leading to complicated private duty cases.

*A Brighter Living* is an adult day care service provider, the latest launched effort to arise out of the Medstaffers family. With an aim to franchising, and propagating their empowering care format state-wide. Two locations are opening in 2017 to start. Growth strategies include franchising, acquisitions, and identifying key partnerships, potentially beyond Pennyslvania as it grows.

The Krebs also have established a real estate holding company, AKTerra LLC, as they are investing in a permanent headquarters located in Carlisle, PA.

Among the Krebs’s five-year list of goal is a plan to open a dialysis center and a pediatric ventilation day care. The experiences of friends and families who have endured multiple kidney transplants, and the difficulties involved in being on the wait list, they believe that the dialysis procedure, all too often a cold and clinical process
as spartan, uncomfortable facilities, should be done better and with more compassion to the recipients. For similar reasons, the prospects of operating a pediatric ventilation center rank high on their list of areas that need attention. They believe strongly that these types of facilities (and others) can offer more to the patient, and preserve their dignity while doing so.

Compliance and Regulatory Policies
Each of the companies formed by the Krebs have established a reputation for meeting, and usually exceeding, the standards for operation set forth by various Offices of Long Term Living, Area Agencies of Aging, and other State and Federal regulatory and oversight agencies. MedStaffers and Alma Health Skilled Services both have stellar track records in audit performances that bears out their attention to detail and refusal to cut corners.

As an example, Mr. Krebs has custom-developed multiple software pieces for the purpose of processing from both state (e.g., Home and Community Services Information System, or HCSIS) and corporate databases (internal billing and time data). These have served as one-time pieces to support audit reporting and as bi-weekly tools to create reports as checks and balances in claims processing.

Having previously adopted many of the policies and procedures that govern the Medicare and Medicaid worlds with great success, we intend to apply similar policies, procedures, and practices to our dispensary model. Debra Altland, as Chief Compliance Officer, will develop and implement self-auditing policies and procedures to ensure that Keystone Center of Integrative Wellness remains “survey ready”.

We will be adapting another Medicare Condition of Participation regulation in parallel: a Quality Management and Performance Improvement (QAPI) program that will ensure compliance and excellence. This level of focus towards ongoing continuous quality improvement is essential in any healthcare based organization. By implementing quality goals and benchmarks that are reviewed monthly and reported quarterly by a QAPI committee to the Board of Directors, KCIW feels our program will set the bar for dispensary standards.

We also will require all staff to have a child abuse clearance and run monthly OIG, EPLS, Medi Check and Sex Offender Registry checks on personnel.

Our approach to training on a topic is to identify the regulations that are pertinent to a care-giving or coordination situation, and verify any questions as to their purpose via direct interaction with the regulating agency. The steps necessary to meet the requirements are documented and laid out as simply as possible so that the caregiver or coordinator can have it explained without adding unnecessary baggage to the concepts. In all cases, every opportunity is made to include logging and documenting steps so the confirmation of the process is obtained.
As an example, the implementation of a telephone system for documenting and reporting shift times posed some initial challenges with service plan/authorization, but the matter was quickly addressed with a more comprehensive initial training upon hire, coupled with frequent monitoring by care coordinators. This regulatory experience will help KCIW to successfully become operational within six-months of being issued a permit, by ensuring compliant processes are in place and staff are trained to them correctly and efficiently.

Focus on Employee and Patient Retention
The result of their diligent attention to regulatory policies, and attention to the needs of their employees and clients, is a retention rate of both clients and employees which greatly exceeds industry standards: under 4%. This level of retention is unheard of in the healthcare industry, and we believe will translate to similar, relatively commendable retention in the pharmaceutical arena.

MedStaffers is also one of the only home care agencies that offers insurance and PTO to all of their employees. Out of 450, they supply over 100 with insurance. All employees can earn up to two weeks off every year. It is a company that embraces their patient and employee based motto: "Quality of Care is Quality of Life and Quality of Life is Quality of Care."

The Krebs have previously demonstrated their ability to rapidly establishing viable, compliant, consumer-compassionate businesses. Their past multiple successes in a heavily regulated industry, which demands a very high level of ethics and accountability, and lay under the purview of the same Department overseeing the Medical Marijuana dispensary program, augurs well for their ability to establish a functioning infrastructure. A 6 month timeline to operation for a dispensary, while aggressive, is one which the Krebs have shown they have the experience to accomplish, without cutting corners or diminishing the services provided to patients, caregivers or the community. This capacity is a key reason KCIW will be able to open within the required timeframe.

The Juliases
Research Design Team, Inc. (RDTeam), a women owned business, was founded by Mary Pat Julias in 2006 with the support of her husband, Chris. The company’s humble beginnings in an 8x10 home office form a stark contrast to today, as RDTeam has expanded into an 8,000-sq. ft. Philadelphia based headquarters with 4 satellite offices in Denver, CO; Tampa/St Petersburg, FL; Santa Cruz, CA; and Jamestown, RI. Additional partner facilities are located in Boston, MA; Chicago, IL and Albuquerque, NM.

Over the past 10 years, RDTeam has survived and thrived in the ever-changing fiscal environment of corporate acquisitions and mergers in the consumer product goods (CPG) industry. In addition, with corporate America increasingly adopting our
government’s accounting practices (e.g., 90 net), the result is that smaller, less financially stable research suppliers are being forced to either close or be acquired by larger research vendors. In response to this change, RDTeam has creatively established successful satellite offices with little to no overhead costs and has generated an active database of 2,000+ additional participants – all accomplished within the initially targeted 4 month timeframe. This aggressive growth initiative increased profitability by 30% on projects in these markets.

In the world of large scale consumer testing, the prevalence of aggressive timelines, multi-faceted objectives, complex factorial design, and hard line budgets can parodically leave little room for plan deviation, while simultaneously requiring the ability to adapt quickly.

A common scenario could involve coordinating the placement of new or test product(s) in the homes of 600-1000 survey participants nationwide, for their evaluation and subsequent participation in multiple on-line surveys within 3 days and across different time zones. RDTeam’s proven track record is attributed to Mary Pat’s strong leadership and organizational skills in directing multiple cross-functional teams with the foresight to identify possible obstacles or issues – such as anticipating participant dropout rates - and proactively deliver world-class solutions – for RDTeam’s customers, the results are high quality, on-time deliverables.

The Juliases have also established a real estate holding company, Shire Holdings LLC, to manage the multiple property locations that RDTeam has occupied.

The Juliases have shown the ability to meet an aggressive schedule while bringing multiple businesses locations to a fully operational status. In a three month period they established and opened four fully functioning ancillary office locations in multiple states, meeting rigorous local conditions and tailoring each to suit their local needs. Although 6 months leaves narrow margins for planning a deployment, they have shown the ability to handle simultaneous diverse, regulation-sensitive and that is why KCW will be able to meet the required timeline.
Potential risks to long term
The primary risk to long-term sustainability for dispensaries would be the reclassification of the product. The expectation in such a scenario would be that Pennsylvania would most likely disband dispensary licenses 3 years from reclassification date.

Our primary mitigation strategy is to ensure that KCIW is as diversified and resistant to such a reclassification as possible. As one of KCIW’s goals is the improvement of our communities by empowering and restoring our clients to becoming contributing members of the community, and continuing to develop other areas of that process (of which the symptomatic treatment capabilities of medicinal marijuana are just a part), we feel that the reclassification would not irreparably damage the viability of the Wellness Center’s model. Dispensary space could be repurposed and the education and work programs would continue to ensure our clients’ improved quality of life.

Expeditious Land, buildings and equipment
Keystone Center of Integrative Wellness has proactively secured land, established building leases and sought zoning approval for various locations across the Commonwealth. We have ensured that each location submitted within any region that is to have a new building or retrofit of an existing one, would be completed within 5 months of being awarded a dispensary license to ensure allowing 1 month for compliance inspections in order to be ready for business in 6 months. We invested in having all of our architectural plans drawn specific to each site. We have identified all the required equipment and some additional equipment which will be financed where appropriate.

Tax History and Current Tax Status
All KCIW Principals and their businesses are in good standing with respect to all state and federal taxes.
Moral Characters of the Business Owners:

REDACTED

SECTION 20 — CURRENT OFFICERS
PROVIDE THE POSITION, TITLE IN THE APPLICANT’S BUSINESS, AND ADDRESS INFORMATION FOR ALL CURRENT OFFICERS, DIRECTORS, PARTNERS OR TRUSTEES.
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

If more space is required, please submit additional information on other officers in a separate document titled "Current Officers (Contd.)" in accordance with the attachment file name format requirements and include it with the attachments.

Section 21 — Ownership

In this section, list all persons with a controlling interest in the business, defined as follows:

1. For a publicly traded company, voting rights that entitle a person to elect or appoint one or more of the members of the board of directors or other governing board, or the ownership or beneficial holding of 5% or more of the securities of the publicly traded company.

2. For a privately held entity, the ownership of any security in the entity.

Complete the appropriate section(s) below:

A. For C-corporations, S-corporations, LLCs and LLLCs
Pennsylvania Department of Health

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Stock type or class: Number of shares held: Date Acquired: Percentage of outstanding voting stock: Terms, conditions, rights and privileges:

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### Medical Marijuana Dispensary Permit Application

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

### B. FOR PARTNERSHIPS AND LLPs

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**Partner Type:**
- General/Full Partner
- Limited Partner
- Dormant/Silent Partner
- Other:

Percentage of ownership: Partnership participation from: Description of participation in operation of the applicant:

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

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## C. Other Persons Holding an Interest in the Proposed Site or Facility

List any other persons holding an interest in the proposed site or facility, that are otherwise not disclosed in Sections A or B.

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[Table continued with same format for additional entries]
### Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

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

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If more space is required, please submit additional information on other persons holding an interest in the proposed site or facility in a separate document titled “Other Persons Holding An Interest in the Proposed Site or Facility (Contd.)” in accordance with the attachment file name format requirements and include it with the attachments.

#### 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:

**REDACTED**

#### 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
When Pennsylvania first began the lengthy process of legalizing medicinal marijuana, it made the creation of integrated programs that could positively impact Commonwealth communities possible. The Keystone Center of Integrative Wellness (KCIW) was built with a profound belief that a community is not the product of one single, evenly connected group but rather the intersection of multiple diverse groups all working towards a collective vision.

KCIW has a core mission designed to benefit the communities of Pennsylvania: integrating a medicinal marijuana dispensary with a center for human services, educational opportunities, and the keystone to workforce development. We believe that community partnership is the catalyst of positive change and not the result of it. Collaborative efforts between ourselves and numerous community benefactors in Northeast Pennsylvania, have and will continue to provide great networking channels in communities throughout the region. Each organization brings its unique strengths to the partnership and provides best of breed affiliations, as well as delivers a foundation of sustainability, prosperity and commonality of dedication that enhances our overarching vision. Our goal at KCIW is to promote growth – be it in economic, agricultural, workforce, or basic health and wellness – across Pennsylvania.

Through a multi-disciplinary approach, bolstered by partnerships within the local community to address variously identified needs, KCIW will provide a Community Impact plan that encourages and facilitates:
• Community Engagement
• Rehabilitation
• Education, Outreach, Training, & Research
• Workforce Development & Local Economic Sustainability
• Philanthropy, Community Contributions, and Charitable Giving

COMMUNITY ENGAGEMENT

Societies thrive when their citizens are engaged and able to collaborate across “niche” boundaries KCIW intends to invoke positive change by focusing on the desires, needs, and struggles of diverse individuals in the community and by creating opportunities to engage them.

As KCIW worked to establish our mission and infrastructure, our team met key community stakeholders to educate ourselves on challenges facing the local populace. We have counseled patients battling terrible diseases and diagnoses who have lost hope in their future quality of living. Through the encouragement of candid conversation amongst community members, we have been made aware of rising concerns regarding job availability, healthcare, and the future sustainability of their communities. KCIW has engineered an innovative solution to a multitude of issues present within Northeast Pennsylvania communities.
We've aligned ourselves with researchers, investors, business owners, and organizations that are working to provide more opportunities within Northeast PA counties and towards the betterment of the local and regional economy. We believe that social groups are self-propagating and that people who share the same values attract each other. With these social constructs in mind, we have aligned ourselves with progressive partners in the medical, educational, scientific, and workforce communities to foster stability, steer a collective vision, and impact the community on a grand scale.

We strongly believe that when community members are welcomed to participate in the changes occurring in their town, their interest will increase, yielding a stronger and thriving community.

The Northeast Pennsylvania region is vital to our overarching strategy for economic development and community growth. One of our proposed dispensaries in the Northeast will be located within the Northeast Education and Technology Center (NEET) in Mayfield, a few miles outside of Scranton, Pennsylvania. The 95,000-square-foot, mixed-use building serves as a business incubator and provides the opportunity for entrepreneurs and product developers to get the assistance necessary to move their ideas and inventions forward. Collaboration with the co-owners of the NEET Center and their ongoing projects with Lackawanna College (LC) and US Ecological Advance Research & Conservation Hub (USEARCH), KCIW's capability of impacting the community has increased exponentially.

REHABILITATION

The principals and operators of KCIW have decades of experience in the health and human services field. Our businesses, Alma Health Skilled Services (AHSS) and MedStaffers, currently service individuals with disabilities who wish to remain in their homes rather than living in a long-term care or nursing facility. To qualify for Home and Community Based Services (HCBS), an individual must meet program requirements, which is diagnoses specific, warranting long-term care. These current human service businesses provide solutions from different angles of disability and disease management.

The role of AHSS is to provide Service Coordination services to individuals on the HCBS waiver program.

Some of the services provided include but are not limited to:
- service plan creation and maintenance,
- serving as a referral source to community agencies and resources, and
- ensuring the safety, security, and independence of their consumers in the community.

In addition, AHSS also has Medicare Accredited home health division that provides intermittent skilled care such as nursing, physical therapy, and speech therapy to
patients with significant medical conditions. These services improve their overall health by providing self-care and disease education so that they can remain independent in the community and within the comfort of their home. MedStaffers, our homecare agency, provides in-person support sessions to individuals once referred through waiver programs and private referrals.

Currently, both companies service all 67 counties in Pennsylvania and the combined client basis is close to 1,700 individuals. Our client demographic services individuals diagnosed with a variety of diagnoses including but not limited to:

- Autism
- Cancer
- Epilepsy
- HIV/AIDS
- Multiple Sclerosis
- ALS
- Severe chronic pain associated with fibromyalgia, neuropathy, Lyme disease etc.

Data mining our internal patient information revealed that over half of our current client base would qualify for a medical marijuana recommendation to treat their conditions. Through our professional access to large numbers of individuals affected by the diseases, we felt it was our duty to integrate a dispensary into our current business model to provide comfort and compassion through medical marijuana to our existing patients.

Of the 17 diagnoses listed in Pennsylvania Act 16 permitting a physician’s recommendation for medical marijuana, at least 14 of the qualifying conditions meet the diagnosis qualifications for the HCBS waiver. After multiple presentations to the general public regarding the human service programs we provide, we realized the overwhelming lack of awareness these individuals have of these resources that are available to them.

As a recipient of a dispensary permit, KCIW would be in a position to assist these individuals in accessing long-term services and programs that they may not have been unaware of.

It's important to realize that KCIW is not just a store-front dispensary. We intend to complement a traditional case management approach tailored with an array of support services as a value-added benefit. By identifying the barriers and challenges patients face, we can provide the support and guidance necessary to overcome obstacles through the introduction to local resources and programs. Our extensive knowledge of various regulations, state programs, and services under the Department of Human Services (DHS), the Department of Health (DOH), the Office of Long-Term Living (OLTL), and the Office of Developmental Programs (ODP) spawned an integral component of our strategy — the employment of social workers and patient care
coordinators within the dispensary to inform patients of services and resources available for their utilization.

KCIW will be able to provide solutions that range from job counseling, community habilitation, resource management, life-skill education, family therapy, and access to many other social services programs since we already have those programs in place. Our hope is to not only provide symptom and condition relief but to also provide the proper support for integrating clients back into functional living and employment.

Take, for example, the veteran who has returned from active duty and is struggling civilian life because of Post-traumatic Stress Disorder (PTSD). With medical marijuana treatments not being legal or available, alcohol, highly addictive pain killers, and illegal substances are typically taken and often abused to mask the emotional and physical pain. Destructive behaviors associated with the patient’s PTSD, substance abuse, and/or dependency can destroy the quality of life, a loss of job, isolation from family members, homelessness, and worse: suicide. With the stability and hope that our vision offers, these veterans can obtain the employment, stability, and dignity they deserve for dedicating years of their life serving the US. These are examples of metrics we will track regarding improving patient quality of life.

As another example, consider a young 21-year-old epileptic woman, terrified of having a seizure in public like she did her freshman year of college resulting in her no longer attending classes and ultimately withdrawing from school. She is too fearful to work and feels exceedingly depressed. Through the treatment of medical marijuana, therapy sessions and the stabilization of her seizures, she feels more open to pursuing her degree and employment. Case managers at KCIW can assist her in seeking out resources in the community to secure funding for her courses and can refer her to our workforce development program.

KCIW is also mindful that the impact of a chronic or debilitating disease can affect everyone. Case managers are prepared to extend resources to a patient’s support circle to manage caretaker stress and burnout and to provide the connection to relevant community support groups.

KCIW is built on the foundation that rehabilitation is feasible, successful outcomes are achievable, and when provided with appropriate resources and knowledge, the potential is endless.

**EDUCATION, OUTREACH, TRAINING, AND RESEARCH**

While KCIW’s understand the necessity of a compliant dispensary program, it also recognizes that the needs of individuals go beyond disease treatment and symptom management. KCIW will work with patients in the realm of their specific diagnosis by educating them about their condition, the proper and responsible use of medical marijuana, and future opportunities available to them as they become stabilized.
KCIW believes that a close partnership with the medical community throughout Northeast Pennsylvania will strengthen our innovative vision and provide our patients with comprehensive and quality care. Because of The Wright Center’s (TWC) 40-year community presence as a non-profit asset and its bi-directional integration of primary care and behavioral health, the decision to collaborate was easily reached. TWC operates community-based safety net centers that provide primary care and a medical home to over 10,000 patients, the majority of whom are uninsured, underinsured, and low-income. TWC is a leader in innovations that foster healthier communities and help shape the future of healthcare.

Dr. Linda Thomas, CEO and Owner of TWC, expressed in a letter supporting KCIW’s dispensary application, “We fully support this effort and look forward to working collaboratively to expand the dispensary model to one that fully integrates an interdisciplinary team in case-management and appropriately addresses individual needs beyond symptomatic treatment.”

TWC is well-equipped to lead the introduction of medical marijuana and dispensaries into the Northeast Pennsylvania region and by working hand-in-hand with them, community and patient education modules will be created and offered throughout the region. They are the Largest Teaching Health Center Graduate Medical Education Consortium in the US. Aware that a new realm of symptomatic and pain management will soon be available to Northeast Pennsylvania residents. Dr. Linda Thomas and TWC are working to have key faculty physicians certified to issue recommendations for medical marijuana.

In 2016, TWC was named an Opioid Use Disorder Center of Excellence (COE) by the Pennsylvania DHS. In this capacity, they are positioned to address the opioid epidemic and serve over 300 patients through the integration of behavioral and mental health care, recovery-oriented service planning and treatment, attention to socioeconomic determinants of health, patient engagement and self-management, and social supports. COEs integrates behavioral health with primary care using a team-based, “whole-person” approach. They are committed to the Recovery-Oriented Systems of Care principles, care is provided within a culturally competent and sensitive environment with appropriate licensure and staff clearances.

Using new CDC guidelines for prescribing opioids to patients, TWC coordinates care for individuals with an opioid use disorder who may have co-occurring behavioral and/or physical health conditions, certifies practitioners in medication-assistant treatment and provides education for all staff, including primary care physicians in training, on alternate pain management methods in order to prevent and reduce future addictions. Through their professional coordination of care, TWC links patients to services and removes barriers to care just as the KCIW proposes to link their patients of the dispensary to social services and remove barriers to community inclusion.
TWC has doctors certified and approved by the DEA to provide FDA-approved medication-assisted treatment to treat opioid addiction. With KCIW tackling the medical marijuana treatment of chronic pain of a newly diagnosed individual in collaboration with TWC treating those who are already addicted to opioids, we are able to comprehensively address multiple angles of the pain management and addiction issue in the Northeast PA region. This is an example of a metric we will track to measure the benefit KCIW brings to the Northeast Region.

The beneficial use of marijuana for chronic pain and cancer is supported by high-quality evidence; additionally, the list of chronic medical conditions where there is potential therapeutic value is growing. Many of the diseases on Pennsylvania approved list are prevalent in Northeast Pennsylvania (e.g., glaucoma, ALS, Crohn’s Disease, chronic pain) and are noted in community health needs assessments. Consequently, physicians are increasingly faced with patient questions about marijuana and its medical applications.

With medical marijuana use becoming more common in clinical practice across the country and it’s critical for physicians to understand both the therapeutic and practical implications of medical marijuana therapies. There must be actively engaged physician leadership to ensure quality and safety standards are met. In addition, physicians should lead medical marijuana education to ensure appropriate use. As liaisons between doctor and patients, our dispensaries will monitor medical marijuana’s effect on a patient. This information is a vital source of information when striving to improve patient outcomes, receptiveness to the treatment and proper usage for maximum efficacy.

In addition to the prominence of cancer and opioid abuse, Pennsylvania also is the epicenter of Lyme disease. According to the CDC, in 2015 there were 7,351 confirmed cases of Lyme in Pennsylvania — more than double that of any other state in the nation. (CDC, 2015) Chronic Lyme is a debilitating disease that arises after the initial treatment of Lyme disease and manifests in multiple forms from fatigue and joint problems to arthritis and severe chronic pain. A current genome research study is in development between TWC and USEARCH. The research team aims to greatly improve the speed and accuracy of Lyme disease diagnosis so that the odds of developing Chronic Lyme and the lingering symptoms are significantly lower. For those patients currently afflicted by the chronic pain that is symptomatic of Chronic Lyme, KCIW is prepared to help educate on the positive medical effects medical marijuana could provide and assist in the connection to a physician able to recommend the utilization of medical marijuana as treatment.

We believe that everyone should have access to the most up-to-date information regarding medical marijuana. Our pharmacists and nursing staff will continually educate the public, caregivers, and professionals. They will regularly offer question/answer sessions allowing KCIW to address any misunderstanding of medical marijuana.
KCIW has established a Professional Advisory Committee (PAC) as a partner and advisor to our management team, further driving our medical and pharmaceutical approach to medical marijuana. The PAC is mandated to provide strategic advice and support to our team on matters involving patient and physician education and awareness, patient wellness, product development initiatives, cannabis research, etc.

Achieving a diverse cross section of medical specialties is a top priority regarding the composition of our PAC. Existing members include a neurologist, an oncologist, a psychiatrist, a pain-management specialist, a nephrologist, and a medicinal chemist. There is no limit to the size of the PAC and our team will continuously evaluate suitable candidates that share our vision for pharmaceutical-grade treatments.

It’s vital that dispensary planning and implementation should be through a platform of inclusive community conversation to ensure it is governed and utilized appropriately. KCIW’s collaboration with community organizations including TWC is an example of service integration that will improve Northeast Pennsylvania health outcomes and facilitate the education and understanding of the medical marijuana program to patients, caregivers, and members of the general public.

**WORKFORCE DEVELOPMENT & LOCAL ECONOMIC SUSTAINABILITY**

KCIW’s multi-faceted model is a workforce and economic development engine. Our unique case management approach improves the employment margin beyond that of a typical dispensary. **Our ability to connect stabilized recipients of medical marijuana to employment services creates an additional hidden workforce development prong that often goes unnoticed.** As more individuals stabilize and become interested in returning to the workforce, they seek out supportive employment services. The demand for additional job coaches will rise to meet demands as referrals for supportive employment services increase.

Once a support plan is implemented, job coaches work one-on-one with an individual to secure a job in the community. As the individual learns his/her work roles and responsibilities, job supports are phased out gradually. It typically takes 3-6 months from the introduction of support services to unassisted, competitive employment, revealing another hidden prong to our workforce development model. Once the rehabilitated individual is employed, the job coach begins again with another supportive employment referral to continue the workforce development cycle. **The job creation potential of this model is infinite.**

Our participation with local Chambers of Commerce in the Northeast region strengthens the network of businesses that are interested in staffing their companies through our employment program. These partnerships, in turn, bolster the range of job opportunities we can make available to job-seekers.

**Education to Employment**
KCIW values education and believes college students are an untapped source of ingenuity and passion that will shape future communities across the Nation. While we aim to positively impact student’s education, KCIW’s goal is to keep graduates within the communities where they attended college so their ingenuity and passion can fuel local community growth. Our strategic efforts to encourage this are shown through offering paid internship opportunities at local colleges, across various fields of study and the extension of employment to our interns after graduation. At our other healthcare and human service businesses, we have successfully converted every internship opportunity into a full-time position. KCIW aims for the same success rate.

Keeping Things Local
In recent years, there has been an upsurge in interest for keeping things local. It’s seen in the production of local food and the promotion of local businesses. It’s displayed in the preservation of local character and the desire to contribute to organizations and efforts within their own neighborhoods. In short, there is an overwhelming desire to create a meaningful and sustainable identity for a community.

Expanded Workforce Pool
In addition to providing a workforce pool from our stabilized dispensary patients for local community businesses, we have expanded the type of services that will be offered to our clients diagnosed with various disabilities and other underserved populations who also wish to secure employment. Nikki Moyers, Chief of Human Services Programs for KCIW, also serves as the Director of Program Development for MedStaffers. One program being developed is an agriculturally focused employment program, Seeds to Success (STS), geared to employ underserved populations and those with disabilities.

The progressive concept behind STS was developed in response to new Federal and State Legislations changes in policy that have prioritized the importance of employment opportunities and community integration of individuals with disabilities. In 2014, the Federal Centers of Medicare and Medicare Services (CMS) issued the HCBS Final Rule. The Final Rule reinforced the expectation of inclusive community settings and prohibited funding for HCBS waivers being used to pay for services that isolate and segregate people with a disability from people without a disability. Simultaneously, the Federal Workforce Innovation and Opportunity Act (WIOA) was enacted and provided comprehensive change to a number of employment and education-related programs including services for people with physical, intellectual, and developmental disabilities.

Following suit of the federal initiatives, Governor Tom Wolf issued Pennsylvania’s “Employment First” Executive Order which established that competitive employment be the first consideration and preferred outcome for all working-age Pennsylvanians with a disability. According to the Department of Labor, there are approximately 1.6 million working-aged Pennsylvanians with a disability, and of that figure, only 20% participate in the active labor force. (PA Executive Order, 2016)
STS will train and employ individuals at the local agricultural level. It encompasses a social impact employment model that promotes sustainable community development by not only creating local jobs but also local revenue. Our contribution is to provide the entire community - residents and businesses alike - the ability to purchase produce and flowers grown within their city through the utilization of greenhouse, vertical, and field farming. Items produced will be available for purchase at community markets and stands throughout the region. By purchasing items directly from a local source, businesses and individuals will promote community unity, reduce the need to outsource to other produce suppliers, and encourage local economic growth. While STS will include a myriad of positions within the agriculture realm, it will also provide opportunities in all the common departments of a business e.g. human resources, inventory, marketing, customer relations, accounting.

KCIW is also eager to introduce the containerized farming agricultural model with medical marijuana grower/processors. It would be interesting to discover whether using this technique to grow marijuana would be as cost beneficial as it's with growing other crops.

Collaborative Affiliations
KCIW has strengthened its workforce development program through our affiliation with Ray Angell, another NEET Center co-owner, the Director of USEARCH, and the former president of LC. As a disabled veteran, Ray has personally seen disabled individuals, especially veterans that despite their qualifications, struggle to get back into the workforce. Because of this, Ray has developed the Lackawanna Veteran Sustainable Agriculture (LVSA) Program which matches military veterans with the emerging containerized farming technology. Built entirely inside a shipping container outfitted with all the tools needed for high-volume, consistent harvests the perfect growing environment is achievable 365 days a year, regardless of geographic location. The LVSA Program has an established network of distributors and consumers that are committed to purchasing the produce of graduates of this program, thereby providing them with guaranteed sales at start-up and a sustainable income. It will operate at the same facility as one of KCIW's proposed Northeastern Pennsylvania dispensaries.

With the goal to apply containerized farming and duplicate the STS and LVSA Program across the region, KCIW and USEARCH will be able to introduce educational, vocational, and employment opportunities to the veteran, disabled, and other underserved populations throughout the Northeast region.

Knowing Your Community
Because Northeastern Pennsylvania is more rural, the region tends to be one of the most underserved communities in Pennsylvania. In working with various Boroughs throughout Northeast Pennsylvania, KCIW will be identifying sites to create farmer’s markets dedicated to agriculture, civic activities, entertainment and environmental education in local communities. Our goal is to revitalize blight and overgrown areas.
replacing them with a community assets which will become a resource for regional farmers, food and related businesses, and the regional population in general.

Through the additional employment in the community markets we will provide local sustainability opportunities to the local and regional residents of Northeast Pennsylvania. The community markets will allow farmers and individuals from our agriculture programs to sell locally grown produce directly to consumers.

KCIW also aims to partner with local high schools and vocational schools to build greenhouses to enhance local sustainable development efforts and to extend the production season. Areas around the facility will be dedicated for flowers beds and will be available for the community to cut and create their own bouquets. The markets will be constructed with different levels developed with stone and pavers to create environmentally friendly areas for vendors, picnic tables and benches. Handicapped accessible areas will be developed to make the entire complex accessible.

PHILANTHROPY, COMMUNITY CONTRIBUTIONS AND CHARITABLE GIVING

Another urgent need in the community is the creation of meaningful programs for individuals with intellectual disabilities and autism upon graduation from high school. Although our focus is to empower the continual growth of individuals after graduation to pursue post-secondary education and become gainfully employed, this is not a realistic goal or expectation for all individuals in the intellectual disabilities and Autism community. In response to the growing concern of parents, schools, and individuals affected, KCIW has created Without Walls (WW), an offsite Community Based Day Program for individuals with intellectual disability and autism. WW reinforces the Governor’s “Employment First” Executive order by incorporating paid work experiences while building on community core fundamentals such as recreation, leisure, education, and civic opportunities to those with disabilities in community settings. WW not only fosters increased community integration but also allows the development of relationships, communication abilities, and builds the confidence to engage with people without disabilities. A portion of the individual's day will be spent creating community gardens referenced earlier, the agricultural market, and volunteering at local food banks, nursing homes, and local businesses.

The integration of horticultural therapy and therapy gardens within health and human service agencies has grown exponentially in recent years. In senior centers, gardening and garden spaces are used to help with fine motor skills, socialization, and ambulatory movement. In veteran’s hospitals, gardening is used for exercise, vocational training, and education.

KCIW is also developing the ability to hold horticultural therapy sessions in their outdoor gardens and greenhouses as a component of value-added services to not just our dispensary consumers, but all community members. In our prior experiences in engaging both children and adults with intellectual disabilities and autism in a nature-
based environment, we have found that the physical garden space itself provides a sense of peace and serenity.

The greenhouse and community garden also serve as a vehicle of charitable contributions, giving to those in the community that need it most. We aim to “grow-a-row” for local food banks and homeless shelters, contributing all of the produce in that row to a different organization each growing season. We also plan to provide plant seedlings free of charge to the elderly and at-risk members of the community. We believe that the greenhouse and community garden will bring neighbors together, foster positive relationships and improve community member’s mental and physical health. Keystone Center for Integrative Wellness also aims to battle obesity and poor food choices by sponsoring free community nutritional workshops and healthy cooking classes with a focus on using garden-grown items.

KCIW’s community greenhouse will introduce families with school-aged children to planting, harvesting and consuming fresh vegetables. With childhood hunger a prominent issue throughout Pennsylvania, KCIW’s future plans include aligning ourselves with local school districts to facilitate school gardens. We hope that by incorporating the knowledge of how to maintain a garden as part of their curriculum, KCIW can provide the tools to prevent future hunger. According to the 2016 County Health Rankings, the percentage of children living in poverty in Lackawanna is 21% while Luzerne’s is 27%. (County Health Rankings, 2016) To combat these current hunger issues for impoverished children, KCIW will be paying off delinquent lunch funds for students within the local communities. We plan to identify numerous at-risk families in the region each year and will pay in advance the cost of lunch every school day, for each child in their family through the end of the school year. No child should have to go without eating or worry about when their next meal will be.

KCIW will collaborate and contribute towards the Pack Them With Love program that currently exists in Northeast Pennsylvania. Every Friday during the academic year, brown bag lunches are placed in the backpacks of food-insecure children for the weekends when they do not have access to school meals. KCIW’s encourages volunteerism and currently extends Paid Time Off to their employees to incentivize them to volunteer in their community. Through a projected increase of those volunteer hours clocked, KCIW aims to provide Pack Them With Love the capacity to operate all year round. Additionally, KCIW aims to duplicate the Pack Them With Love program through multiple school districts across the Northeast region.

LOOKING FORWARD

Establishing relationships with grower/processor groups upon permit award is crucial to the continued momentum of the medical marijuana operation in Pennsylvania. KCIW expects to continually positively impact the community with furthered collaboration opportunities to advance the medical marijuana industry.
Since medical marijuana legalization is new to Pennsylvania, full comprehension of diagnosis-specific variation and dosage form has not been realized. Close monitoring and documentation of a patient’s response to specific derivatives is vital information. Our Chief of Pharmacy Science, Umamaheswar Siripurapu, has experience compounding medications for individual patients based on their diagnosis requirements or demands. Once permitted by regulation, we will be able to provide different variations and dosage forms of medical marijuana at a dispensary level which allows for an easier adjustment of the product composition than at a grower/processor level.

When dispensaries, grower/processors, and physicians strive to work in tandem, the advancements to medical marijuana research will be profound. For example, it has been shown that patients with Autism benefit from the use of medical marijuana. It’s well documented that sensory sensitivity is a symptom of Autism and some patients with Autism are very particular to the taste and smell of their medications. With our converging knowledge and expertise within human services and the medical and scientific community, close coordination with our grower could lead to a solution to such issues.

Our case management driven dispensary model provides the ideal platform for the collection, documentation, and relay of patient feedback. Our patients have the ability to provide the direct feedback crucial to the improvement of their own medication which ultimately fosters a sense of control and self-direction of their care and health. KCW is amplifying the voice of every patient that receives medical marijuana from our dispensary ensuring their input will be heard by the grower/processor. The documentation will help facilitate longitudinal data analysis of their usage based on their conditions and help to guide novel product development geared directly towards our patients.

References
Attachment A: Signature Page

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

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

<table>
<thead>
<tr>
<th>☒ Yes</th>
<th>☐ No</th>
</tr>
</thead>
</table>

The applicant hereby submits this application for a Medical Marijuana Organization Permit to the Pennsylvania Department of Health, which consists of the completed application parts and attachments listed below:

FEES:
- ☒ Initial Application Fee
- ☒ Initial Permit Fee

APPLICATION:
- ☒ Completed Application

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

BACKGROUND CHECKS:
- ☒ The applicant has requested background checks, as described in the instructions.
**ADDITIONAL ATTACHMENTS:**

Please list any other documents you are submitting as part of this application:

<table>
<thead>
<tr>
<th>File Name</th>
<th>Name of Document</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Keystone Center of Integrated Wellness LLC_03202017_Dispensary_Operational Timetable (Contd.)</td>
<td>Section 8: Operational Timetable</td>
<td>Shows Operational Readiness</td>
</tr>
<tr>
<td>Keystone Center of Integrated Wellness LLC_03202017_Dispensary_Employee Qualifications, Description of Duties and Training (Contd.)</td>
<td>Section 9: Employee Qualifications, Description of Duties and Training</td>
<td>To demonstrate roles and responsibilities, qualifications and training requirements PLAN OF OPERATIONS</td>
</tr>
<tr>
<td>Keystone Center of Integrated Wellness LLC_03202017_Principal_Financial_Backers_Operators (Contd.)</td>
<td>Section 4A: PRINCIPAL, FINANCIAL BACKERS, OPERATORS(CONTD)</td>
<td>CONTINUATION OF LISTING NAMES</td>
</tr>
<tr>
<td>Keystone Center of Integrated Wellness LLC_03202017_Employees (Contd.)</td>
<td>Section 4B: EMPLOYEES (CONTD)</td>
<td></td>
</tr>
<tr>
<td>Keystone Center of Integrated Wellness LLC_03202017_Dispensary_Current Officers (Contd.)</td>
<td>Section 20: Current Officers</td>
<td></td>
</tr>
</tbody>
</table>

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: Aaron H. Krebs
Title in Applicant's Business: COO
Date: Nov 20, 2017

Printed Name: Aaron H. Krebs
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 certified copies of documentation that show that the applicant is authorized to do business in Pennsylvania.
- Complete this cover sheet. Scan this sheet and the organizational documents and save it as a PDF file called "Attachment B," using the appropriate file name format.

<table>
<thead>
<tr>
<th>Business Name, as it appears on the applicant's certificate of incorporation, charter, bylaws, partnership agreement or other legal business formation documents:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Keystone Center of Integrative Wellness, LLC</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Trade names and DBA (doing business as) names:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Principal Business Address: 21 State Avenue, Suite 102</td>
</tr>
<tr>
<td>City: Carlisle</td>
</tr>
<tr>
<td>Phone: 1-888-805-1764</td>
</tr>
</tbody>
</table>
Certificate of Organization Domestic Limited Liability Company
(15 Pa.C.S. § 8913)

Name: wendell victor courtney

Address: DOH REDACTION

Document will be returned to the name and address you enter to the left.

Fee: $125.00

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):
   Leaf of Life, 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: 26 State Avenue
   City: Carlisle
   State: PA
   Zip: 17013
   County: Cumberland

   (b) Name of Commercial Registered Office Provider: 
   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: Krista Krebs
   Address: DOH REDACTED

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

PENN File: April 26, 2016
5. Strike out if inapplicable term
   Management of the company is vested in a manager or managers.

6. The specified effective date, if any is: (month date year hour, if any) 04/27/2016 11:49 AM. 
   month date year 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 8½ x 11 sheet.

IN TESTIMONY WHEREOF, the organizer(s) has (have) signed this Certificate of Organization this
26 day of April, 2016.

Krista Krebs
Signature
1. Entity Name:
   Leaf of Life, LLC

In the case of a foreign association which must use an alternate name to register to do business in Pennsylvania, the alternate name should be given.

2. Tax Responsible Party

   Name of individual responsible for initial tax reports: Krista Krebs

   26 State Avenue, Suite 102, Carlisle, Cumberland, PA, United States, 17013

   Number and Street  City  State  Zip  County

3. Description of Business Activity:
   To engage in any lawful activity for which a Limited Liability Company may be organized in the Commonwealth of Pennsylvania, including without limitation, operating as a Dispensary as defined in the Medical Marijuana Act.

4. FEIN [Employer Identification Number/Federal Tax Identification Number]:

   FEIN enables agencies to confirm that Commonwealth accounts are properly matched and that this request is processed without added delay. If the business entity does not currently have an FEIN, it can get a FEIN immediately by applying online at irs.gov at the following page http://www.irs.gov/Businesses/Small-Businesses-&-Self-Employed/Employer-ID-Numbers-EINs.
Keene, Gwenn
4431 North Front Street
Harrisburg PA 17110

Keystone Center of Integrative Wellness, LLC

THE BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS IS HAPPY TO SEND YOUR FILED DOCUMENT. THE BUREAU IS HERE TO SERVE YOU AND WE WOULD LIKE TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.

IF YOU HAVE ANY QUESTIONS PERTAINING TO THE BUREAU, PLEASE VISIT OUR WEBSITE AT www.dos.pa.gov/BusinessCharities OR YOU MAY CONTACT US BY TELEPHONE AT (717) 787-1057. INFORMATION REGARDING BUSINESS AND UCC FILINGS CAN BE FOUND ON OUR SEARCHABLE DATABASE AT www.corporations.pa.gov/Search/CorpSearch.

ENTITY NUMBER: 6395488
Pennsylvania Department of State
Bureau of Corporations and Charitable Organizations
Certificate of Amendment-Domestic
(15 Pa.C.S.)

Limited Partnership ($8512)
X Limited Liability Company ($8951)

Name
Gwen Keene
Address

Document will be returned to the name and address you enter to the left.

Fee: $70.00

In compliance with the requirements of the applicable provisions (relating to certificate of amendment), the undersigned, desiring to amend its Certificate of Limited Partnership/Organization, hereby certifies that:

1. The name of the limited partnership/limited liability company is:
   Leaf of Life, LLC


3. Check, and if appropriate, complete one of the following:
   X The amendment adopted by the limited partnership/limited liability company, set forth in full, is as follows:
   Change name of entity to "Keystone Center of Integrative Wellness, LLC".
   
   The amendment adopted by the limited partnership/limited liability company is set forth in full in Exhibit A attached hereto and made a part hereof.

4. Check, and if appropriate, complete one of the following:
   X The amendment shall be effective upon filing this Certificate of Amendment in the Department of State.
   
   The amendment shall be effective on: ___ at ___.

5. Check if the amendment restates the Certificate of Limited Partnership/Organization:
   
   The restated Certificate of Limited Partnership/Organization supersedes the original Certificate of Limited Partnership/Organization and all previous amendments thereto.

Penn File: February 8, 2017
IN TESTIMONY WHEREOF, the undersigned limited partnership/limited liability company has caused this Certificate of Amendment to be executed this 8th day of February, 2017.

Leaf of Life, LLC

Name of Limited Partnership/Limited Liability Company

Krista Krebs

Signature

Managing Member

Title
Keene, Gwenn
4431 North Front Street
Harrisburg PA 17110

Keystone Center of Integrative Wellness, LLC

THE BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS IS HAPPY TO SEND YOUR FILED DOCUMENT. THE BUREAU IS HERE TO SERVE YOU AND WE WOULD LIKE TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.

IF YOU HAVE ANY QUESTIONS PERTAINING TO THE BUREAU, PLEASE VISIT OUR WEBSITE AT www.dos.pa.gov/BusinessCharities OR YOU MAY CONTACT US BY TELEPHONE AT (717) 787-1057. INFORMATION REGARDING BUSINESS AND UCC FILINGS CAN BE FOUND ON OUR SEARCHABLE DATABASE AT www.corporations.pa.gov/Search/CorpSearch.

ENTITY NUMBER: 6395488
PENNSYLVANIA DEPARTMENT OF STATE
BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS

Return document by mail to:
Gwenn Keene

Return document by email to:

City
State
Zip Code

Change of Register
DSCR: 15-1507/5548
(rev. 2/2017)

Pedro A. Cortés
Secretary of the Commonwealth

Entity#: 6395488
Date Filed: 03/08/2017

Fee: $5.00
The type of domestic association (check only one):

☐ Business Corporation  ☑ Limited Liability Company  ☐ Limited Liability Limited Partnership

☐ Nonprofit Corporation  ☐ Limited Partnership

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. § 1507/5507/8625/8825 (relating to change of registered office), the undersigned domestic corporation, limited liability company, limited partnership or limited liability limited partnership, desiring to effect a change of registered office, hereby states that:

1. The name of the association is: Keystone Center of Integrative Wellness, LLC

2. The current registered office address as on file with the Department of State. Complete part (a) OR (b) – not both:

(a) 26 State Avenue,
Carlisle PA 17013 Cumberland
Number and Street City State Zip County

(b) c/o:

Name of Commercial Registered Office Provider County

3. New address. Complete part (a) or (b) – not both:

(a) The address in this Commonwealth to which the registered office of the corporation, limited partnership or limited liability company is to be changed is:
21 State Avenue, Suite 102
Carlisle PA 17013 Cumberland
Number and Street City State Zip County

(b) The registered office of the corporation, limited partnership or limited liability company shall be provided by:

c/o:

Name of Commercial Registered Office Provider County

4. For corporations only: Such change was authorized by the Board of Directors of the corporation.

IN TESTIMONY WHEREOF, the undersigned has caused this Statement or Certificate of Change of Registered Office to be signed by a duly authorized officer, general partner, member or manager thereof this 08 day of March, 2017.

Keystone Center of Integrative Wellness, LLC
Name of Corporation/Limited Partnership/Limited Liability Limited Partnership/Limited Liability Company

Krista Krebs
Signature

Chief Operating Officer
Title

PENN File: March 8, 2017
OPERATING AGREEMENT

OF

KEYSTONE CENTER OF INTEGRATIVE WELLNESS, LLC

THIS OPERATING AGREEMENT (the "Agreement"), dated and effective as of February 20, 2017, has been adopted by Krista Krebs, Mary Pat Julias, Aaron Krebs and Chris Julias, as the members (the "Members") of Keystone Center of Integrative Wellness, LLC, a Pennsylvania limited liability company (the "Company").

NOW THEREFORE, in consideration of the mutual covenants and agreements set forth herein, and intending to be legally bound hereby, the Members agree as follows:

1. **Definitions.** In addition to the terms defined in other provisions of this Agreement, the following terms shall have the meanings set forth below unless the context requires otherwise:


   "Affiliate." As to any Person, any other Person that directly or indirectly, through one or more intermediaries controls, is controlled by or is under common control with such Person or, if such Person is an individual, the Immediate Family of such Person or trusts solely for the benefit of such Immediate Family. As used in this definition, the term "control" means the possession, directly or indirectly, or as trustee or executor, of the power to direct or cause the direction of the management and policies of a Person, whether through ownership of voting securities, as trustee or executor, by contract or credit arrangement or otherwise.

   "Agreement." This Operating Agreement, as amended, modified, supplemented or restated from time to time.

   "Capital Account." The individual account maintained by the Company with respect to each Member as provided in Section 7.

   "Capital Contribution." The aggregate amount of cash and the agreed value of any property or services (as determined by the Member and the Company) contributed by each Member to the Company as provided in Section 6. In the case of a Member that acquires a Membership Interest in the Company by an assignment or transfer in accordance with the terms of this Agreement, "Capital Contribution" means the Capital Contribution of that Member's predecessor proportionate to the acquired Membership Interest.
“Certificate.” The certificate of organization of the Company and any and all amendments thereto and restatements thereof filed on behalf of the Company with the Department of State of the Commonwealth of Pennsylvania pursuant to the Act.

"Claim." See Section 21(b).


“Company.” See the preamble.

“Covered Person.” A Member, any Affiliate of a Member, any officer, director, shareholder, partner, employee, representative or agent of a Member, or their respective Affiliates, or any officer, employee or agent of the Company or its Affiliates.

"Damages." See Section 21(a).

"Immediate Family." With respect to any individual, such individual's parents, spouse, issue and adopted children, or any of them.

"Indemnified Party." See Section 21(b).

“Laws.” Any of the following:

(1) all constitutions, treaties, laws, statutes, codes, ordinances, orders, decrees, rules, regulations and municipal by-laws, whether domestic, foreign or international;

(2) all judgments, orders, writs, injunctions, decisions, rulings, decrees and awards of any governmental body;

(3) all policies, practices and guidelines of any governmental body; and

(4) any amendment, modification, re-enactment, restatement or extension of any of the foregoing, in each case binding on or affecting the party or Person referred to in the context in which such word is used.

“Majority Vote.” The written approval of, or the affirmative vote by, Members holding a majority of the Voting Rights.

“Member.” A Person who at the time is a member of the Company. “Members” means two or more Persons when acting in their capacities as members of the Company. For purposes of the application of a provision of the Act to the Company, the Members shall constitute one class or group of members. Exhibit A hereto shall be amended from time to time to show the current Members and their respective Membership Interests and Percentage Interests in the Company.
“Membership Interest.” The interest of a Member in the Company, including, without limitation, interests in the profits and losses, rights to distributions (liquidating or otherwise), allocations, information, and to consent to or approve actions by the Company, all in accordance with the provisions of this Agreement and the Act.

"Notice." See Section 21(b).

“Percentage Interest.” The proportionate Membership Interest of a Member expressed as a percentage, as shown on Annex A.

“Person.” A natural person, corporation, general or limited partnership, limited liability company, joint venture, trust, estate, association or other legal entity or organization.


“Taxable year.” The calendar year or any portion thereof for which the Company is required to allocate Profits and Losses and other items.

“Treasury Regulations.” The income tax regulations, including temporary regulations, promulgated under the Code, as those regulations may be amended from time to time (including corresponding provisions of succeeding regulations).

“Voting Rights.” The number of votes of each Member (as set forth in Section 10(b)) for the purpose of voting on any matter arising under this Agreement.


2. **Organization.** The Members hereby reaffirm the organization of the Company as a limited liability company under and pursuant to the provisions of the Act and agree that the rights, duties and liabilities of the Members shall be as provided in the Act, except as otherwise provided in this Agreement.

3. **Purpose.** The object and purpose of, and the nature of the business to be conducted and promoted by, the Company is to operate as a Dispensary, as defined in the Medical Marijuana Act, 35 P.S. § 10231.101, et. seq., and any lawful act or activity for which limited liability companies may be formed under the Pennsylvania Limited Liability Company Act, 15 Pa. C.S. § 8901, et seq., as amended from time to time (the “Act”) and engaging in any and all lawful activities necessary or incidental to the foregoing.

4. **Term.** The existence of the Company commenced on the date the Certificate was filed in the office of the Department of State of the Commonwealth of Pennsylvania and shall continue until the Company is dissolved in accordance with the provisions of this Agreement and the Act.
5. **Principal Office.** The principal office of the Company shall be located at 21 State Avenue, Suite 101, Carlisle, PA 17013, or at such other location as may be determined, from time to time, by the Members. The Company may also have such other offices at such other locations as may be determined, from time to time, by the Members.

6. **Company Capital and Percentage Interests.**

   (a) **Initial Capital Contributions.** The initial Capital Contribution that each Member has made or is deemed to have made to the Company is set forth opposite the Member’s name in Exhibit A.

   (b) **Additional Capital Contributions.** A Member shall not be required to make any capital contribution to the Company not specifically agreed to in writing between the Member and the Company, or be obligated or required under any circumstances to restore any negative balance in the Member’s Capital Account.

   (c) **No Interest.** Interest shall not be paid on or with respect to the Capital Contribution or Capital Account of any Member.

   (d) **No Right to Return of Capital Contributions.** Although the Company may make distributions to the Members from time to time as a return of their Capital Contributions, a Member shall not have the right to withdraw or demand a return of any of the Member’s Capital Contribution or Capital Account, except upon dissolution or liquidation of the Company.

   (e) **Membership Interests.** The Membership Interest of each Member shall be as set forth in Exhibit A, which is attached hereto and incorporated herein by reference.

7. **Capital Accounts.** At all times while there is more than one Member, a Capital Account shall be established and maintained on the books of the Company for each Member.

   (a) The allocation and capital account maintenance provisions of Treasury Regulations under Section 704 of the Internal Revenue Code are hereby incorporated by reference, including a "qualified income offset" within the meaning of Treas. Reg. Section 1.704-1(b)(2)(ii)(d), the rules regarding allocation of "partner nonrecourse deductions" under Treas. Reg. Section 1.704-2(i)(1), "minimum gain chargeback" under Treas. Reg. Section 1.704-2(f) and "partner nonrecourse debt minimum gain chargeback" under Treas. Reg. Section 1.704-2(i)(4), and the limitation on allocation of losses to any Member that would cause a deficit capital account in excess of such Member's capital contribution obligations and share of minimum gain and partner nonrecourse debt minimum

- 4 -

(b) To the extent contributed property has a fair market value at the time of contribution that differs from the contributing Member's basis in the property, and to the extent the carrying value of property of the Company otherwise differs from the Company's basis in such property, depreciation, gain and loss for capital account purposes shall be computed by reference to such carrying value rather than such tax basis. In accordance with Section 704(c) of the Code, income, gain, loss and deduction with respect to such property shall, solely for tax purposes, be shared among the Members so as to take account of the variation between the basis of the property to the Company and its fair market value at the time of contribution, or at the time that the carrying value of such property is adjusted under Treas. Reg. Section 1.704-1(b)(2)(iv)(f), as the case may be.

8. Allocation of Profits or Losses. At all times while there is more than one Member, Profits or Losses shall be allocated to the Members in accordance with their respective Percentage Interests, except as otherwise provided in Section 7.


(a) General rule. Subject to subsection (b), distributions of cash and/or other assets or property of the Company, from whatever source (including, without limitation, net proceeds of Company operations and sale, and financing or refinancing of Company assets) shall be made to the Members in accordance with their respective Percentage Interests at such times, and in such amounts, as the Members shall determine. In making determinations regarding distributions, the Members may set aside funds and establish reserves for such items as the Members shall determine, including, without limitation, working capital, maintenance of bonding capacity, capital expenditures, acquisition of other assets by the Company and the satisfaction of liabilities (including, without limitation, contingent liabilities).

(b) Minimum Distribution. With respect to any taxable year of the Company in which Members are allocated taxable income for Federal income tax purposes (and for this purpose all items of income, gain, loss or deduction required to be separately stated pursuant to Section 703 of the Code shall be included in the calculation of taxable income, other than the amount, if any, by which capital losses exceed capital gains), the Company shall attempt to distribute to the Members, within 90 days after the close of that taxable year, no less than the amount determined by multiplying the Company’s taxable income (computed as set forth in this sentence) by the highest composite Federal, state and local income tax rate applicable to any Member. For purposes of the preceding sentence, the Company’s taxable income for a year shall be reduced by any net loss of the Company in prior years that has not previously been so taken into account under this Section 9(b). Nothing herein shall require the Company to borrow money.
or reduce its cash flow so as to restrict its ability to operate the day-to-day activities of the business in order to make such distributions.

10. **Establishment of Reserves.** The Members shall have the right and obligation to establish reasonable reserves for maintenance, improvements, acquisitions, capital expenditures and other contingencies, such reserves to be funded with such portion of the operating revenues of the Company as the Members may deem necessary or appropriate for that purpose.

11. **Tax Returns.** The Members shall arrange for the preparation of all tax returns required to be filed for the Company. Each Member shall be entitled to receive, upon written request, copies of all Federal, state and local income tax returns and information returns, if any, which the Company is required to file. All information needed by the Members and other Persons who were Members during the applicable taxable year for income tax purposes shall be prepared by the Company’s accountants and furnished to each such Person after the end of each taxable year of the Company.

12. **Tax Elections.**

   (a) To the extent permitted by applicable tax law, the Company may make the following elections on the appropriate tax returns:

   (1) to adopt the calendar year as the Company's taxable year;

   (2) to adopt the cash method of accounting and to keep the Company's books and records on the income-tax method;

   (3) if a transfer of a Membership Interest as described in Section 743 of the Code occurs, on written request of any transferee Member, or if a distribution of Company property is made on which gain described in Section 734(b)(1)(A) of the Code is recognized or there is an excess of adjusted basis as described in Section 734(b)(1)(B) of the Code, to elect, pursuant to Section 754 of the Code, to adjust the basis of Company properties;

   (4) to elect to amortize the organizational expenses of the Company and the start-up expenditures of the Company ratably over a period of 60 months as permitted by Sections 195 and 709(b) of the Code; and

   (5) any other election the Members may deem appropriate and in the best interests of the Members.

   (b) Neither the Company nor any Member may make an election for the Company to be taxable as a corporation for Federal income tax purposes or to be excluded from the application of the provisions of subchapter K of chapter 1 of subtitle A of the Code or any similar provisions of applicable state law, and no provision of this Agreement shall be construed to sanction or approve such an election.

- 6 -
13. **Tax Matters Partner.** If the Company is subject to the consolidated audit procedures of Sections 6221 to 6234 of the Code, the "tax matters partner" of the Company pursuant to Section 6231(a)(7) of the Code shall be a Member that is designated as such by vote of the Members. Any Member who is designated "tax matters partner" shall take such action as may be necessary to cause each other Member to become a "notice partner" within the meaning of Section 6223 of the Code. Any Member who is designated "tax matters partner" shall inform each other Member of all significant matters that may come to its attention in its capacity as "tax matters partner" by giving notice thereof on or before the fifth Business Day after becoming aware thereof and, within that time, shall forward to each other Member copies of all significant written communications it may receive in that capacity.

14. **Tax Withholding.** Unless treated as a Tax Payment Loan, any amount paid by the Company for or with respect to any Member on account of any withholding tax or other tax payable with respect to the income, profits or distributions of the Company pursuant to the Code, the Treasury Regulations, or any state or local statute, regulation or ordinance requiring such payment (each a “Withholding Tax Act”) shall be treated as a distribution to the Member for all purposes of this Agreement. To the extent that the amount required to be remitted by the Company under a Withholding Tax Act exceeds the amount then otherwise distributable to the Member, the excess shall constitute a loan from the Company to the Member (a “Tax Payment Loan”). Each Tax Payment Loan shall be payable upon demand and shall bear interest, from the date that the Company makes the payment to the relevant taxing authority, at the applicable Federal short-term rate under Section 1274(d)(1) of the Code, determined and compounded semiannually. So long as any Tax Payment Loan or the interest thereon remains unpaid, the Company shall make future distributions due to the Member under this Agreement by applying the amount of any such distribution first to the payment of any unpaid interest on all Tax Payment Loans of the Member and then to the repayment of the principal of all Tax Payment Loans of the Member. The Members shall take all actions necessary to enable the Company to comply with the provisions of any Withholding Tax Act applicable to the Company and to carry out the provisions of this subsection.

15. **Conflicts of Interest.**

   (a) **Other Business Interests.** Any Member or Affiliate thereof may engage in or possess an interest in other business ventures of any nature or description, independently or with others, similar or dissimilar to the business of the Company, and the Company and the Members shall have no rights by virtue of this Agreement in and to such independent ventures or the income or profits derived therefrom, and the pursuit of any such venture, even if competitive with the business of the Company, shall not be deemed wrongful or improper. No Member or Affiliate thereof shall be obligated to present any particular investment opportunity to the Company even if the opportunity is of a character that, if presented to the Company, could be taken by the Company, and any Member or Affiliate thereof shall have the right to take for its
own account (individually or as a partner or fiduciary) or to recommend to others any such particular investment opportunity.

(b) **Interested Transactions.** A contract or transaction between the Company and one or more of its Members or between the Company and another domestic or foreign association in which one or more of its Members have a management role or a financial or other interest, shall not be void or voidable solely for that reason, or solely because the Member is present at or participates in the meeting of the Members that authorizes the contract or transaction, or solely because the vote of the Member is counted for that purpose, if:

1. the material facts as to the relationship or interest and as to the transaction are disclosed or known to the Members entitled to vote thereon and the contract or transaction is specifically approved in good faith by vote of those Members; or

2. the contract or transaction is fair to the Company as of the time it is authorized, approved or ratified by the Members.

16. **Control and Management.**

(a) **Power and Authority of the Members.** Management of the business and affairs of the Company shall be vested in the Members. Except as otherwise provided in this Agreement, any decision, determination or other action to be made or taken by the Members shall be made or taken by Majority Vote. The Members shall have all rights and powers relating to the Company, including, but not limited to, the following:

1. to appoint, and remove with or without cause, a President, one or more Vice Presidents, a Secretary, a Treasurer and such other officers of the Company as the Members deem appropriate to carry out and execute the decisions and instructions of the Members in the day to day operations of the business of the Company, with such duties and powers as are from time to time specified by the Members;

2. to retain all or any part of the Company’s assets as long as the Members deem advisable, and to invest, reinvest and keep invested all or any part thereof, without being restricted in any way with respect to the type of assets retained or invested in or with respect to the portion of the assets devoted to any investment;

3. to purchase, lease or otherwise acquire the ownership, use or benefit of assets, properties, rights or privileges, real or personal, tangible or intangible, of any kind or description, whether income producing or not;

4. to sell, pledge, mortgage, lease without limit of time, exchange, or to grant options for the purchase, lease or exchange of any Company assets, on such terms and conditions as the Members may determine;
(5) to institute any legal action or proceeding on behalf of the Company;

(6) to assign, transfer, pledge, compromise or release any claims or debts due the Company;

(7) to make, execute or deliver any assignment for the benefit of creditors or any confession of judgment, mortgage, deed, guarantee, indemnity or surety bond;

(8) to vote at any election or meeting of any corporation, partnership, limited liability company, joint venture or other entity, in person or by proxy, to appoint agents to do so in the place and stead of the Members, and to exercise all rights (including without limitation approval and consent rights) that the Company may have with respect to such entity, whether pursuant to applicable law, governing documents, contracts or otherwise;

(9) to borrow money for any purpose that the Members consider to be for the benefit of the Company or to facilitate its administration, and to mortgage or pledge Company assets to secure the repayment thereof;

(10) to retain and pay custodians, accountants, counsel and other agents and to incur any other expenses which are reasonably related to the operation of the Company;

(11) to enter into agreements with, and to fix and adjust the compensation of, employees of the Company; and

(12) to invest in time deposits and savings accounts and to maintain banking accounts in any institutions determined by the Members.

(b) Voting Rights. Each Member shall have that number of Voting Rights as equals such Member’s Percentage Interest in the Company (e.g., a Member who has a Percentage Interest of 25.5% in the Company shall have 25.5 Voting Rights).

(c) Voting Procedures. Members may vote in person or by proxy at a meeting of Members (which may be held by conference telephone), or by consent in lieu of a meeting. Proxies and consents shall be in writing or communicated by electronic means.

(d) Binding Effect of Actions. Each Member shall be bound by, and hereby consents to, any and all actions taken and decisions made by the Members in accordance with the terms of this Agreement. Any person designated by the Members, including any Member designated by the Members, shall have the authority to bind the Company. Any act taken by, or any document executed by, Members holding a majority of the Percentage Interests shall be binding on the Company with the same force and effect as if the action, or the execution of the document, were approved by a vote of the Members. Except as provided in this Section 16(d), no Member shall have authority to bind the Company.

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17. **Transfer of Interests; Admission of Additional Members.**

   (a) **Restrictions on Transfer.** No member shall encumber, pledge, assign, sell or otherwise transfer his interest in the Company, now or hereafter owned, voluntarily or involuntarily, whether by operation of law or otherwise, to any person or entity other than to the Company or another Member of record at the time thereof unless the remaining Members shall unanimously consent in writing. Any action by a Member in violation of this Section 17(a) shall be invalid and shall not be recognized by the Company.

   (b) **Admission of Additional Members.** The Members may by unanimous consent admit additional members to the Company. Each additional Member shall sign this Agreement and obtain such Membership Interest (including, without limitation, such Percentage Interest) and participate in the Profits, Losses and distributions of cash or other assets of the Company on such terms as the Members shall determine.

18. **Dissolution.**

   (a) **Events of Dissolution.** The Company shall dissolve, and its affairs shall be wound up, upon the first to occur of the following:

   1. the vote, consent or agreement of the Members; or

   2. the entry of an order of judicial dissolution of the Company under Section 8972 of the Act.

   (b) **Distributions upon Dissolution.** In the event of the dissolution of the Company, the assets of the Company shall be liquidated in such manner as the Members shall determine and, after the obligations of the Company to third parties have been discharged or provided for in accordance with applicable law, the net proceeds of the liquidation shall be distributed as follows:

   1. first, among the Members, if any, who have made unrepaid loans or advances to the Company, in an amount up to the aggregate amount of such unrepaid loans and advances, and in proportion to the amount of such loans and advances and the unpaid interest thereon;

   2. second, among the Members, in an amount up to the aggregate amount of their unrepaid Capital Contributions, and in proportion to the amounts of such unrepaid Capital Contributions; and
third, among the Members in accordance with their respective Percentage Interests.

(c) **Procedure.** A reasonable time shall be allowed for the liquidation of the Company in order to minimize the losses normally attendant upon a liquidation.

(d) **Certificate of Dissolution.** On completion of the liquidation of Company assets as provided herein, the Members (or such other person or persons as the Act may require or permit) shall file a Certificate of Dissolution with the Department of State of the Commonwealth of Pennsylvania and take such other actions as may be necessary to terminate the existence of the Company.

(e) **Final Accounting.** In connection with the Company’s liquidation, the Company’s accountants shall compile and furnish to each Member a statement setting forth the assets and liabilities of the Company as of the date of complete liquidation.

19. **Books and Records.**

(a) **General Rule.** The Members shall cause to be kept full and accurate books and records of the Company. All books and records of the Company shall be kept at the Company’s principal office and shall be available at such location at reasonable times for inspection and copying by the Members or their duly authorized representatives. The Company shall maintain the following records, among others:

1. A current list of the full name and last known business address of each Member.

2. A copy of the Certificate and all amendments thereto.

3. Copies of the Company’s Federal, foreign, state and local income tax returns and reports.

4. A copy of this Agreement and all amendments thereto.

5. Any financial statements of the Company.

(b) **Annual Financial Information.** The Company shall furnish to its Members annual financial statements, including at least a balance sheet as of the end of each fiscal year and a statement of income and expenses for the fiscal year. The financial statements shall be prepared on the basis of generally accepted accounting principles, if the Company prepares financial statements for the fiscal year on that basis for any purpose and may be consolidated statements of the Company and one or more of its subsidiaries. The financial statements shall be mailed by the Company to each of the Members within 120 days after the close of each fiscal year. Statements that are not audited or reviewed by a certified public
accountant shall be accompanied by a statement of the person in charge of the Company’s financial records:

(1) Stating his or her reasonable belief as to whether or not the financial statements were prepared in accordance with generally accepted accounting principles and, if not, describing the basis of presentation.

(2) Describing any material respects in which the financial statements were not prepared on a basis consistent with those of the previous year.

20. **Liability of Members.** The Members, as such, shall not be liable for the debts, obligations or liabilities of the Company except to the extent required by the Act.

21. **Indemnification.**

(a) **Indemnification of Covered Persons.** Except as expressly prohibited by Law, the Company shall indemnify, defend and hold harmless each Covered Person from and against any and all debts, losses, claims, damages, costs, demands, fines, judgments, contracts (implied and expressed, written and unwritten), penalties, obligations, payments, liabilities of every type and nature (whether known or unknown, fixed or contingent), including, without limitation, those arising out of any lawsuit, action or proceeding (whether brought by or on behalf of a party to this Agreement or by any third party), together with any reasonable costs and expenses (including, without limitation, reasonable attorneys’ fees, out-of-pocket expenses and other reasonable costs and expenses incurred in investigating, preparing or defending any pending or threatened lawsuit, action or proceeding) incurred in connection with the foregoing (collectively "Damages") suffered or sustained by such Covered Person by reason of any act, omission or alleged act or omission by such Covered Person arising out of such Covered Person's activities taken primarily on behalf of the Company, or at the request or with the approval of the Company, or primarily in furtherance of the interests of the Company. Notwithstanding the foregoing, indemnification shall not be available under this Section 21 where the acts, omissions or alleged acts or omissions upon which an actual or threatened action, proceeding or claim is based constituted willful misconduct or recklessness.

(b) **Indemnification Procedure.** The procedure under which indemnification shall be provided under this Section 21 shall be as follows:

(1) A party seeking indemnification from the Company pursuant to subsection (a) (an "Indemnified Party") shall give prompt notice to the Company of the assertion of any claim, including any claim brought by a third party, in respect of which indemnity may be sought (a "Claim") and shall give the Company such information with respect thereto as the Company may reasonably request, but no failure to give such notice shall relieve the Company of any liability hereunder except to the extent the Company has suffered actual prejudice thereby.
(2) Except as provided in subsection (b)(3) below, the Company shall have the right, exercisable by written notice (the "Notice") to the Indemnified Party (which Notice shall state that the Company expressly agrees that as between the Company and the Indemnified Party, the Company shall be solely obligated to satisfy and discharge the Claim) within 30 days of receipt of notice from the Indemnified Party of the commencement of or assertion of any Claim, to assume the defense of the Claim, using counsel selected by the Company and reasonably acceptable to the Indemnified Party. If the Company fails to give the Indemnified Party the Notice within the stated time period, the Indemnified Party shall have the right to assume control of the defense of the Claim and all Damages in connection therewith shall be reimbursed by the Company upon demand of the Indemnified Party.

(3) The Company shall not have the right to assume the defense of a Claim:

   (i) seeking an injunction, restraining order, declaratory relief or other non-monetary relief against the Indemnified Party (whether or not the Company is also named as a party), or

   (ii) if the named parties to the action (including any impleaded parties) include both the Indemnified Party and the Company and the Indemnified Party has been advised by counsel that there are one or more legal or equitable defenses available to the Indemnified Party that are different from those available to the Company.

(4) A party defending a Claim shall not have the right to compromise or settle any claim for non-monetary relief against any other party without the other party's consent. A party defending a Claim shall not have the right to compromise or settle any claim for monetary relief against any other party without the other party's consent unless the monetary relief is paid in full by the settling party. A party shall not unreasonably withhold or deny its consent under this subsection (b)(4), but an Indemnified Party shall not be required to consent to a compromise or settlement of a Claim if in the reasonable judgment of the Indemnified Party the compromise or settlement would have a continuing material adverse effect on the Indemnified Party's business (including any material impairment of its relationships with customers and suppliers).

(5) If at any time after the Company assumes the defense of a Claim the situation changes such that the Company would not be able to assume the defense of the Claim under subsection (b)(3) above if the Claim were newly filed at that time, the Indemnified Party shall have the same rights as if the Company never assumed the defense of the Claim.

(6) The Company or the Indemnified Party, as the case may be, shall always have the right to participate, at its own expense, in the defense of any Claim that the other is defending.

(7) Whether or not the Company chooses to defend or prosecute a Claim involving a third party, the Company and the Indemnified Party shall cooperate in the
defense or prosecution thereof and shall furnish such records, information and testimony, and attend such conferences, discovery proceedings, hearings, trials and appeals as may be reasonably requested in connection therewith.

(c) Right to Advancement of Expenses. Except as expressly prohibited by Law, expenses (including legal fees) incurred by a Covered Person in defending any claim, demand, action, suit or proceeding shall, from time to time, be advanced by the Company prior to the final disposition of such claim, demand, action, suit or proceeding upon receipt by the Company of an undertaking by or on behalf of the Covered Person to repay such amount if it shall be determined that the Covered Person is not entitled to be indemnified as authorized in subsection (a) hereof.

(d) Insurance. The Company may purchase and maintain insurance, to the extent and in such amounts as the Members shall deem reasonable, on behalf of Covered Persons and such other Persons as the Members shall determine, against any liability that may be asserted against or expenses that may be incurred by any such Person in connection with the activities of the Company or such indemnities, regardless of whether the Company would have the power to indemnify such Person against such liability under the provisions of this Agreement. The Company may enter into indemnity contracts with Covered Persons and such other Persons as the Members shall determine and adopt written procedures pursuant to which arrangements are made for the advancement of expenses and the funding of obligations under this Section 21 and containing such other procedures regarding indemnification as are appropriate.

(e) Non-Exclusivity of Rights. The rights conferred on any person by this Section 21 shall not be exclusive of any other rights which such person may have or hereafter acquire under any statute, provisions of the Certificate or the Agreement, vote of Members or otherwise.

(f) Amendment or Repeal. Any repeal or modification of this Section 21 shall not adversely affect any right or protection hereunder of any person in respect of any act or omission occurring prior to the time of such repeal or modification.

(g) Changes in Law. References in this Section 21 to Law shall be to such Law as it existed on the date this Agreement was executed or as such Law thereafter may be changed, except that:

1. in the case of any change that limits the indemnification rights or the rights to advancement of expenses that the Company may provide, the rights to indemnification and to the advancement of expenses provided in this Section 21 shall continue as theretofore agreed upon to the extent permitted by Law; and

2. if the change permits the Company without the requirement of any further action by the Members to provide broader indemnification rights or rights to the advancement of expenses than the Company was permitted to provide prior to the change, then
the rights to indemnification and the advancement of expenses shall be so broadened to the extent permitted by Law.

(h) **Applicability.** The provisions of this Section 21 shall be applicable to all actions, suits or proceedings commenced after its adoption, whether such arise out of acts or omissions which occurred prior or subsequent to such adoption and shall continue as to a person who has ceased to be a Covered Person, and shall inure to the benefit of the heirs and personal representatives of such person.

22. **Miscellaneous.**

(a) **Notices to Members.** Any notice required to be given to a Member under the provisions of this Agreement or by the Act shall be given either personally or by sending a copy thereof:

(1) By first class or express mail, postage prepaid, or courier service, charges prepaid, to the postal address of the Person appearing on the books of the Company for the purposes of notice. Notice pursuant to this subsection (a)(1) shall be deemed to have been given to the Person entitled thereto when deposited in the United States mail or with a courier service for delivery to that Person.

(2) By facsimile transmission, e-mail or other electronic communication to the Person’s facsimile number or address for e-mail or other electronic communications supplied by the Person to the Company for the purpose of notice. Notice pursuant to this subsection (a)(2) shall be deemed to have been given to the Person entitled thereto when sent.

(b) **Entire Agreement.** This Agreement constitutes the entire agreement among the Members with respect to the subject matter hereof and supersedes all prior agreements, express or implied, oral or written, with respect thereto. The express terms of this Agreement control and supersedes any course of performance or usage of trade inconsistent with any of the terms hereof.

(c) **Effect of Waiver or Consent.** A waiver or consent, express or implied, to or of any breach or default by any Person in the performance by that Person of its obligations with respect to the Company is not a consent or waiver to or of any other breach or default in the performance by that Person of the same or any other obligations of that Person with respect to the Company. Failure on the part of a Person to complain of any act of any Person or to declare any Person in default with respect to the Company, irrespective of how long that failure continues, does not constitute a waiver by that Person of its rights with respect to that default until the period of the applicable statute of limitations has run.

(d) **Execution in Counterparts.** This Agreement may be executed in any number of counterparts, each of which shall be deemed to be an original as against any Party
whose signature appears thereon, and all of which shall together constitute one and the same instrument. If executed in multiple counterparts, this Agreement shall become binding when any counterpart or counterparts, individually or taken together, bear the signatures of all of the parties.

(e) **Amendments.** This Agreement may be amended only if the amendment is approved by the vote, consent or agreement of 51% of the Percentage Interests. An amendment to this Agreement must be in writing and shall take effect when executed by Members holding at least 51% of the Percentage Interests.

(f) **Binding Effect and Rights of Third Parties.** This Agreement has been adopted to govern the operation of the Company, and shall be binding on and inure to the benefit of the Members and their respective heirs, personal representatives, successors and assigns. This Agreement is expressly not intended for the benefit of any creditor of the Company or any other Person, except a Person entitled to indemnification or advancement of expenses under Section 21. Except and only to the extent provided by applicable Law, no such creditor or other Person shall have any rights under this Agreement.

(g) **Governing Law.** This Agreement shall be governed by and interpreted and enforced in accordance with the substantive laws of the Commonwealth of Pennsylvania (including, without limitation, provisions concerning limitations of actions), without reference to the conflicts of laws rules of that or any other jurisdiction, except that Federal law shall also apply to the extent relevant.

(h) **Severability.** If any provision of this Agreement or the application thereof to any Person or circumstance is held invalid or unenforceable to any extent, the remainder of this Agreement and the application of that provision to other Persons or circumstances shall not be affected thereby and that provision shall be enforced to the greatest extent permitted by Law.

(i) **Arbitration.** All disputes arising under this Agreement shall promptly be submitted to arbitration in the Commonwealth of Pennsylvania, before one arbitrator in accordance with the rules of the American Arbitration Association. The arbitrator may assess costs, including counsel fees, in such manner as the arbitrator deems fair and equitable. The award of the arbitrator shall be final and binding upon all parties, and judgment upon the award may be entered in any court of competent jurisdiction.
<table>
<thead>
<tr>
<th>Member</th>
<th>Capital Contribution</th>
<th>Membership Interests</th>
<th>Percentage Interests</th>
</tr>
</thead>
</table>

DOH REDACTED

Exhibit A
IN WITNESS WHEREOF, the undersigned Members have executed and delivered this Operating Agreement of Keystone Center of Integrative Wellness, LLC as of the date first above written.

WITNESS:

[Signatures]

[Signatures]
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 unexpired lease for the proposed site and facility and a written statement from the property owner that the applicant may operate a medical marijuana organization on the proposed site for, at a minimum, the term of the initial permit
  - Other evidence that shows that the applicant has a location to operate its medical marijuana organization
- Complete this cover sheet. Scan this sheet and the appropriate document(s) and save it as a PDF file called "Attachment C," using the appropriate file name format

Business Name, as it appears on the applicant’s certificate of incorporation, charter, bylaws, partnership agreement or other official documents:
Keystone Center of Integrative Wellness, LLC

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

<table>
<thead>
<tr>
<th>Principal Business Address:</th>
<th>21 State Avenue, Suite 102</th>
</tr>
</thead>
<tbody>
<tr>
<td>City: Carlisle</td>
<td>State: PA</td>
</tr>
<tr>
<td>Phone: 1-888-805-1764</td>
<td>Fax: 1-888-883-4507</td>
</tr>
</tbody>
</table>
AGREEMENT OF SALE

The CITY OF WILKES-BARRE, a municipal corporation organized and existing under the laws of the Commonwealth of Pennsylvania, herein called "Seller," agrees to sell to ARTANOR, LLC, herein called "Buyer," and Buyer agrees to purchase from Seller, the following real properties, on the terms and conditions contained herein:

i. 773 South Franklin Street, Wilkes-Barre, Pennsylvania (PIN: I9NE1-020-001); and

ii. Vacant Lot, Westminster Street, Wilkes-Barre, Pennsylvania (PIN: I9NE1-020-003)

ARTICLE 1. PURCHASE PRICE

1.01. The purchase price for said properties shall be the sum of One Thousand Six Hundred Dollars ($1,600.00), payable by Buyer to Seller at settlement and allocated as follows:

i. $100.00 for 773 South Franklin Street
ii. $1,500.00 for Vacant Lot, Westminster Street

ARTICLE 2. SETTLEMENT

Establishment

2.01. A settlement shall be, pursuant to this Agreement, at Wilkes-Barre City Hall, 40 E. Market Street, Wilkes-Barre, Pennsylvania, or any other location mutually acceptable to Buyer and Seller, on or before April 30, 2017, such time being agreed to be of the essence.

Conditions of Settlement

2.02. The termination of such settlement and the Buyer's obligation to purchase said property pursuant to this Agreement are conditioned on:

Good Title

(1) The conveyance to Buyer or their nominee of good and marketable title to said property, subject only to such liens, encumbrances, clouds, or conditions as may be approved in writing by Buyer.

Delivery of Possession

(2) Delivery of possession of said property to Buyer or its nominee, immediately on settlement, free and clear of all uses and occupancies except as Buyer may waive in writing.
Dispensary Permit Award

(3) The Buyer being awarded a marijuana dispensary permit from the Commonwealth of Pennsylvania.

Failure of Conditions

2.03. Should any of the conditions specified in Paragraph 2.02 of this Agreement fail to occur, Buyer shall have the power, exercisable by the giving of written notice to Seller, to cancel such settlement, terminate this Agreement, and recover any amounts paid by them to Seller or to an escrow holder on account of the purchase price of said property. The exercise of such power by Buyer shall not, however, constitute a waiver by them of any other rights they may have against Seller for breach of this Agreement.

Prorations

2.04. There shall be prorated between Seller and Buyer on the basis of thirty (30) day months, as of the day of settlement:

Real property taxes and, if applicable, any other agreed upon assessments including but not necessarily limited to such items as water, sewer, refuse, association fees, and other similar items.

Bonds and Assessments

2.05. Intentionally left blank.

Brokers' Commissions

2.06. Intentionally left blank.

Expenses of Settlement

2.07. The expenses of the settlement described in this Article shall be paid in the following manner:

(1) The cost of preparing, executing, and acknowledging any deeds or other instruments required to convey title to Buyer or its nominee in the manner described in this Agreement shall be paid by Seller.

(2) Any costs of recordation shall be paid by Buyer.

(3) Any tax imposed on the conveyance of title to said property to Buyer or its nominee shall be paid by Seller and Buyer in equal proportions.
(4) Any legal fees incurred by Buyer or Seller shall be paid by the party who incurred the fees.

(5) Any settlement fee charged by the escrow holder or settlement agent required by this Agreement shall be paid by Buyers.

ARTICLE 3. REPRESENTATIONS AND WARRANTIES OF SELLER

Warranties of Seller

Seller hereby represents and warrants to Buyer as follows, which representations and warranties shall be deemed made by Seller to Buyer also as of settlement:

(1) There are no parties in possession of any part of said property or lessees, tenants at sufferance, or trespassers;

(2) There is no pending or threatened condemnation or similar proceeding or assessment affecting said property, or any part thereof, nor to the best knowledge and belief of Seller are any such proceedings or assessments contemplated by any governmental authority;

(3) Said property has full and free access to and from public highways, streets or roads and, to the best knowledge and belief of Seller; there is no pending or threatened governmental proceeding which would impair or result in the termination of such access.

ARTICLE 4. BREACH

By Seller

4.01. Should Seller default on the full and timely performance of any of its obligations under the terms of this Agreement for any reason other than Buyer’s default, Buyer may:

(1) Enforce specific performance of this Agreement;

(2) Request that any down payment shall be forthwith returned to Buyer; or

(3) Bring suit for damages against Seller.

By Buyers

4.02. Should Buyer fail to consummate the purchase of said property, the conditions to Buyer’s obligations set forth in Paragraph 2.02 of this Agreement having been satisfied and Buyer being in default, and Seller not being in default hereunder, Seller may:

(1) Bring suit for damages against Buyer; or
(2) Keep any down payment made by Buyer, such sum being agreed on as liquidated damages for the failure of Buyers to perform the duties, liabilities, and obligations imposed on them by the terms and provisions of this Agreement. Seller agrees to accept and take said cash payment as its total damages and relief and as Seller's sole remedy hereunder in such event.

ARTICLE 5. MISCELLANEOUS

Assignment of Agreement

5.01. This Agreement shall be binding on the respective heirs, executors, administrators, successors, and to the extent assignable, on the assigns or nominees of the parties hereto, provided Buyer shall not transfer or assign this Agreement without first having obtained the express written consent of Seller. On delivery to Seller of an instrument in writing whereby the assignee of the Buyer assumes all of the provisions of this Agreement to be performed by Buyer, then, in that event, Buyers shall be released and discharged of all further liability hereunder.

Survival of Covenants

5.02. Any of the representations, warranties, covenants, and agreements of the parties, as well as any rights and benefits of the parties pertaining to a period of time following the settlement of the transactions contemplated hereby shall survive the settlement and shall not be merged therein.

Pennsylvania Law to Apply

5.04. This Agreement shall be construed under and in accordance with the laws of the Commonwealth of Pennsylvania. All obligations of the parties created hereunder are performable in Luzerne County, Pennsylvania.

Recording

5.05. This Agreement shall not be recorded in the Office of Recorder of Deeds, or in any other office or place of public record and if Buyers shall record this Agreement or cause or permit the same to be recorded, Seller may, at its option, elect to treat such act as a breach of this Agreement.

Legal Construction

5.06. In case any one or more of the provisions contained in this Agreement shall for any reason be held to be invalid, illegal, or unenforceable in any respect, such invalidity, illegality, or unenforceability shall not effect any other provision hereof, and this Agreement shall be construed as if such invalid, illegal, or unenforceable provision had never been contained herein.
Prior Agreements Superseded

5.07. This Agreement constitutes the sole and only agreement of the parties hereto and supersedes any prior understandings or written or oral agreements between the parties respecting the aforesaid subject matter.

Time of Essence

5.08. Time is of the essence of this Agreement.

Gender

5.09. Words of any gender used in this Agreement shall be held and construed to include any other gender, and words in the singular number shall be held to include the plural, and vice versa, unless the context requires otherwise.

Descriptive Heading

5.10. The descriptive headings used herein are for convenience only and are not intended to necessarily refer to the matter in sections which precede or follow them, and have no affect whatsoever in determining the rights or obligations of the parties.

Counterparts/Digital Signatures

5.11. The Parties may execute this Agreement in any number of separate counterparts, each of which, when executed and delivered by the parties hereto, shall have the force and effect of any original. All such counterparts shall be deemed to constitute and are deemed to be the same instrument.

5.12. Facsimile or digital signature(s) shall constitute original signature(s) for all purposes herein.

(SIGNATURES ON FOLLOWING PAGE)
IN WITNESS WHEREOF, the parties hereto, intending to be legally bound hereby, have hereunder set their hands and seals this 17th day of March, 2017.

Attest: Jim Ryan, City Clerk

SELLER: City of Wilkes-Barre

Theodore Wampole, City Administrator

Ray McHugh,
Deputy City Controller

BUYER: Artanor, LLC

By: Mary [Signature]

Title:
March 15, 2017

Ms. Krista Krebs
Keystone Center of Integrative Wellness
26 State Avenue, Suite 101
Carlisle, PA 17015

RE: Lease of Space at the Northeast Environmental Technology Center (NEET)
Keystone Center of Integrative Wellness
Mayfield, Pennsylvania

Dear Ms. Krebs:

Please accept this letter as certification that we are the owners of The NEET Center located at 1300 Old Plank Road in Mayfield PA. We are excited to have you consider our location for the siting of a medical cannabis dispensary to serve the northeast Pennsylvania region.

I want to thank you and your team for visiting us on several occasions and involving us with the state’s application process and implementation of the dispensary program at our property.

Furthermore, your presentation and explanation of the dispensary application process to the municipality of Mayfield Borough at a regularly scheduled meeting was well received and fully supported by the full board. We fully embrace your professionalism and your ability to conduct this business venture at our building with utmost confidence.

We strongly encourage the Commonwealth of Pennsylvania to grant your company a dispensary license for our location and we stand by you in bringing this project to fruition.

Please call upon us for any assistance regarding this project and license.

Sincerely,

[Signature]

Karl F. Pfeiffenberger Jr.
Managing Member

CC: File
Mayfield Borough

1300 Old Plank Road
Mayfield, Pennsylvania 18433
March 17, 2017

Pennsylvania Department of Health
8th Floor West
625 Forster Street
Harrisburg, PA 17120

Re: Keystone Center of Integrative Wellness

To whom it may concern:

The Keystone Center of Integrated Wellness ("Keystone") intends to operate a Medical Marijuana Dispensary at a wellness center it plans on constructing on property being purchased from the City of Wilkes-Barre. Although the property is located in an R-2 residential zone, it is surrounded on three (3) sides by properties that serve heavily commercial purposes. Accordingly, Keystone will be seeking approval of a special exception by the City’s Planning Commission and Zoning Board. Any special exception would be in conformity with other commercial properties currently operating in the same R-2 zone. This process would insure that the dispensary would meet the same municipal zoning and land use requirements as other commercial facilities currently located and operating in the same zoning district.

Please note, as mentioned above, the property being used for the project is being purchased from the City of Wilkes-Barre. At the request of the Mayor, the sale was authorized and approved by Wilkes-Barre City Council. Thank you for your attention to this matter. Please call with any question or comment.

Very truly yours,

William Harris

WILLIAM HARRIS,
Planning & Zoning Director

WH/ms
Cc: Mayor Anthony G. George
its intention to do so not later than sixty (60) days prior to the expiration of the lease term then in effect. To constitute effective notice of an intention to exercise an option under this lease, the notice must be sent by certified or registered mail to Landlord at the address and in accordance with the procedures provided in Paragraph 30 of this lease and must be postmarked no later than the latest date provide in this paragraph of Tenants exercise of the option.

5) RENT: Tenant will pay the Base Rent monthly to Landlord at 1300 Old Plank Road, Mayfield PA 18433, or at such other location or locations that Landlord may from time to time designate by written notice to Tenant. The rent shall be a monthly fee of $7,070.42 per month (the "Rent"), aggregating to $84,885 per annum, with a 3% escalation in the Base Rent. Rental payments shall commence Nov - 1, 2017. Tenant may exercise the option to extend ("Additional Option Periods") for two additional five (5) year periods. Rent will increase during the Additional Option Periods by three (3) percent each year during the Additional Option Periods.

6) PAYMENT OF RENT: Tenant agrees to pay Landlord, without prior demand and without any deduction or set-off whatsoever, the Rent, in advance, on or before the first day of each month ("Due Date") at the address set forth above or as designated by Landlord. All sums of money or charges of any kind or nature payable by Tenant to Landlord pursuant to this Lease or the exhibits attached hereto, other than Rent, are defined as "Additional Rent."

7) LATE CHARGES AND INTEREST: All unpaid sums due Landlord pursuant to this Lease shall bear interest at five percent (5%) of the balance of the rent due the Landlord in the current and any previous month as of the tenth of the current month. The late fee shall be considered additional rent. Late charges shall also apply to any Rent or Additional Rent paid by Tenant by personal or bank check, and which check is returned due to Non-Sufficient Funds, notwithstanding that the payment by check was tendered to Landlord on or before the Due Date.

8) SECURITY DEPOSIT: The security deposit for the performance of Tenant's obligations hereunder shall be 2 months' rent. Upon the occurrence of any Event of Default by Tenant or damage caused to the leased premises beyond normal wear and tear, Landlord may from time to time and without affecting any other remedy available to Landlord under this Lease or otherwise under law or at Equity, use the rental payments to the extent necessary to satisfy any arrears of Base Rent or Additional Rent, or any other damage, injury, expense or liability caused to Landlord by such Event of Default.

9) TAXES: Tenant shall be responsible for and shall pay when due all municipal, county and state taxes and all fees and charges assessed during the term of this Lease attributable to Tenant's leasehold interest or the personal property of any kind owned by or placed on the Premises by Tenant. Landlord agrees to pay all taxes, assessments and governmental charges of any kind and nature whatsoever, levied or assessed against the Leased Premises, which are specifically related and applicable to the land and improvements.

10) USE: Tenant may use and occupy the Premises to operate and conduct its business and related purposes, and for no other purpose without written consent of Landlord, which consent
shall not be unreasonably withheld, conditioned or delayed.

(a) Permitted Use: The leased premises will be used to advance the proprietary development of an Advanced Oxidation Process that enables produced water to be recycled and reused in the hydraulic fracturing process for any drilling operation. Tenant shall not use or permit any person to use the Premises or any part thereof, for any use or purpose in violation of any law or ordinance.

(b) Use of Common Areas: Restrooms, stairs, hallways, lobbies, parking lots, exterior walkways and access areas, and other common areas of the Building shall be for the use of the Tenant. Tenant and its officers, employees, agents, and invitees will use such common areas in a reasonable and orderly manner in cooperation with all other tenants and their officers, employees, agents and invitees.

(c) Uses of Other Areas: Tenant use of the lecture hall, classrooms, breakout rooms, and the boardrooms will be at the discretion of the Landlord. Additional charges may apply, which shall be deemed added rent.

(d) Waste, Nuisance, or Illegal Uses: Tenant shall not use or permit the use of the Premises in any manner that may result in waste of the Premises, or constitutes a nuisance or violates any statute, ordinance, rule, or regulations applicable to the Premises or any portion thereof.

(e) Rules and Regulations: Tenant rules and regulations are located in Exhibit A-2. The Landlord has the right to update, change and add to the list of rules and regulations throughout the course of the lease.

11) COMPLIANCE WITH LAWS: The Tenant shall comply with the requirements of all duly constituted public authorities and with terms of all statutes, rules, ordinances, orders and regulations of any federal, state and local authority, which are applicable to the Tenant’s use, and occupation of the Premises.

12) ACCESS: The Tenant shall permit the Landlord (and all agents, representatives and employees of the Landlord) to enter upon the Premises at all reasonable times during regular business hours with prior notification to Tenant except in the case of an emergency to inspect the Premises and to exhibit the same to prospective purchasers, mortgagees and tenants, appraisers, and assessors, and shall permit such entry at any time as required to make repairs that are the obligation of the Landlord and for any other business purpose or emergency.

The Building will be closed on Saturday and Sunday and the following Holidays: New Years Day, Memorial Day, Independence Day (July 4), Labor Day, Thanksgiving Day, and Christmas Day. The Building may also be closed in emergency situations at the discretion of the Landlord. The tenant has access to the Premises after regular operation hours and on holidays and weekends. All tenant access after regular operation hours requires the tenant to keep all exterior doors locked. The tenant may not under any
circumstances duplicate or copy building keys. Additional keys can be obtained and signed out through the Landlord.

At the termination of the lease all keys must be returned to the Landlord. Should any employee of the Tenant be discharged, it will be the Tenant’s responsibility to return any building keys that were assigned to the discharged employee to the Landlord.

13) BUILDING EXPENSES: Landlord shall be responsible for all utilities, including electricity, heat, water and sewage in the Building, at Landlord’s sole expense. All charges for Tenant’s telephone and internet services, and janitorial for tenants space shall be borne by Tenant.

The landlord shall not be liable to the Tenant for damages in the event of an interruption in the delivery of the utility services resulting from any cause beyond Landlord’s control, and the Tenant hereby releases the Landlord from any and all liability for such damages, as well as damage that may result from the bursting, stoppage or leakage of any water, gas, steam, sewer, waste, or drain pipe, and the property damage caused thereby.

14) MAINTENANCE: Landlord shall, at its sole cost and expense, maintain the Premises, including but not limited to general maintenance and upkeep of the building. Landlord shall keep the Premises in good order, condition and repair in accordance with standards generally found in other first-class office buildings. As part of Landlord's maintenance obligations, Landlord shall be responsible for, at its sole cost and expense:

(a) Janitorial service of the buildings common area, including the removal of debris, cleaning of space, and vacuuming of carpets shall be on a time schedule designed to keep the Facility and Premises in a clean and orderly condition;
(b) Electricity and lighting in common areas including exterior lighting; water
(c) Securing the Premises and locking all doors at the end of each day.

Landlord shall, at its expense, maintain the roof, foundation and the structural soundness of the exterior walls of the building in which the Leased Premises are located, as well as maintain, repair and/or replace the primary HVAC, plumbing, and electrical as needed for the Premises.

Tenant shall repair and pay for any damage caused by negligence of Tenant, or Tenant's employees, agents or invitees, or caused by Tenant's default hereunder. Tenant is responsible for the replacement of lamps in lighting fixtures in its leased spaces.

Tenant shall immediately give Landlord written notice of any defect or need for repairs, after which Landlord shall have reasonable opportunity to repair the same or cure such defect.
Tenant shall use reasonable precaution against fire and other hazards in the Facility.

15) **ALTERATIONS:** Tenant shall not make any alterations to the Premises without Landlord's prior written consent, which consent can be withheld in Landlord's sole discretion.

16) **CONDITION UPON TERMINATION:** Upon termination of this Lease, Tenant shall surrender the Premises to Landlord, broom clean, without damage and in the same condition as received, except for ordinary wear and tear which Tenant is not otherwise obligated to remedy under any provision of this Lease. All alterations to the Premises (including any floor covering and whether or not installed with Landlord's consent) shall be the property of Landlord and shall remain upon the Premises at the termination of this Lease, unless Landlord directs Tenant to remove all or any of such alterations. Tenant may, without expense to Landlord and no later than two (2) weeks after the termination of this Lease, remove all machines and equipment which are installed and can be removed without damage to the Premises, and other articles of personal property owned by Tenant, and not affixed to the Premises in any manner. Tenant shall, at its sole expense, repair any damage to the Premises caused by the installation or removal of any furniture, fixtures, alterations or additions removed by Tenant and restore the Premises to its original condition.

17) **ASSIGNMENT, TRANSFER AND SUBLETTING:** Tenant may not assign, transfer or encumber its interest in this Lease, voluntarily, or by the operation of law or otherwise, without prior written consent of Landlord, which consent can be withheld in Landlord's sole discretion. Any such assignment, transfer, encumbrance or permission to occupy the Premises without Landlord's prior written consent shall be void. In the event Landlord shall so consent, Tenant shall remain liable for all of its obligations under this Lease.

Landlord has the expressed right to assign any or all of its interests under the terms of this Lease, provided however, that such assignment shall not affect the rights of Tenant hereunder, and that written notice of such assignment shall be given to the Tenant within ten (10) business days of such assignment.

18) **SUBORDINATION, ATTORNMENT AND ESTOPPEL:** Landlord reserves the right to subordinate this Lease to the lien of any mortgage now or hereafter placed upon the Premises. Tenant agrees to execute any documents within fourteen (14) days of a written request by Landlord or Landlord's mortgagee to confirm any such subordination. At the request of the holder of any such mortgage, this Lease may be made prior to any such mortgage and Tenant shall execute such other documents and agreements giving priority to this Lease as such mortgagee shall require. Tenant agrees that upon such mortgagee's filing for record in the applicable Register of Deed's Office of a Notice of Subordination or any document executed unilaterally by such mortgagee subordinating the lien of the mortgage to this Lease, such lease shall be prior to such mortgage.

Tenant shall, in the event any proceedings are brought for the foreclosure of, or in the event of exercise of the power of sale under any mortgage or deed in lieu of foreclosure heretofore or hereafter made relating to the land or building of which the Premises is a part, attorn to the purchaser upon any such foreclosure or sale and recognize such purchaser as the Landlord under this Lease.

Tenant agrees to execute and deliver within fourteen (14) days after request by
Landlord a written statement in recordable form which certifies (a) that this Lease is in full force and effect, (b) the Commencement Date of this Lease, (c) that Rent is paid currently without any set-off or defense thereto, (d) the amount of Rent, if any, paid in advance, and (e) that there are no uncured defaults by Landlord or stating those claimed by Tenant, provided that such facts are accurate and ascertainable.

19) ACCESS: Landlord shall have the right to enter the Premises at all reasonable times to inspect the Premises.

20) CASUALTY: In the event the Premises, or any portion thereof, shall be damaged or destroyed by fire or other casualty not caused by Tenant, its employees or invitees, so as to become partially or totally untenable, the repair of the damages shall be promptly commenced by Landlord. Until the damaged Premises are restored to a tenantable condition, Rent shall abate entirely in the instance of total destruction or pro rata in the instance of partial destruction. The obligation of Landlord to reconstruct shall be limited to reconstructing the Premises in substantial accordance with the initial plans and specifications. In no event shall Landlord be required to repair or replace Tenant's merchandise, trade fixtures, furnishings or equipment.

In the event the repairs to the Premises are not completed within one hundred twenty (120) days of the casualty, Tenant may terminate this Lease upon written notice to Landlord.

21) WAIVER OF SUBROGATION: Landlord and Tenant each hereby release and discharge the other, and any partner, officer, agent, employee or representative of such party, of and from any liability whatsoever hereafter arising from loss, damage or injury caused by fire or other casualty for which insurance (permitting waiver of liability and containing waiver of subrogation) is carried by the injured party at the time of such loss, damage or injury to the extent of any recovery by the insured party under such insurance.

22) EMINENT DOMAIN: If any portion of the building or land of which the Premises is a part, or the use and occupancy thereof, shall be taken under the power of eminent domain, Landlord may, at Landlord's option, at any time after the entry of the verdict or order for such taking, terminate this Lease by not less than thirty (30) days notice in writing to Tenant. All damages and compensation awarded for any taking under the power of eminent domain shall belong to and be the property of Landlord, whether such damages or compensation be awarded for the leasehold or the fee or other interest of Landlord or Tenant in the Premises; provided, however, that Landlord shall not be entitled to any award made for Tenant's loss of business or removal of Tenant's property. If all the building and land of which the Premises is a part shall be taken under the power of eminent domain, then the term of this Lease shall cease as of the day actual possession shall be taken by such power and the Rent shall be paid up to that day with a pro rata refund by Landlord of any prepaid Rent. If a portion of the Premises are taken by eminent domain, and the Landlord does not elect to terminate this Lease, this Lease shall terminate only as to that part so taken as of the day possession shall be taken by such public authority, and thereafter all the terms herein shall continue in effect, except the fixed minimum annual rental shall be reduced in proportion to the amount of the Premises so taken.

23) DAMAGES: Landlord shall not be liable to Tenant for any damage to Tenant or Tenant's property from any cause other than the willfully wrongful acts of Landlord. Tenant shall
defend, indemnify and hold Landlord harmless from all liability for damage to any person or property occurring in, on or about the Premises or resulting from Tenant's occupancy and use of the Premises.

24) **INSURANCE:** During the entire term of this Lease, including any renewals, modifications or extensions, Tenant, at its sole cost and expense shall procure and keep in effect commercial general liability insurance (including contractual liability insurance) with a combined single limit for bodily injury and property damage in an amount no less than One Million Dollars ($1,000,000.00), single limit for injury to any one person, and in an amount of not less than Three Million ($3,000,000.00) Dollars for bodily injuries (including death) to any number of persons in any one occurrence, and not less than Five Hundred Thousand ($500,000.00) Dollars for damage to property, or any increased limits as required by state regulations, insuring against all liability of Tenant and Landlord, and their authorized agents and representatives, arising out of and in connection with Tenant's use, occupancy and condition of the Premises and any improvements thereon. Tenant's insurance policy shall include Landlord as a named insured. Further, Tenant shall provide Landlord with a copy of its insurance certificate or similar proof of the existence of the required policy.

Landlord shall procure and maintain a policy of insurance from a reputable insurance company qualified to do business in the State where the Premises are located at its expense insuring the Leased Premises and all leasehold improvements for 80% of market value or replacement cost.

25) **HOLDING OVER:** If Tenant, without Landlord's prior consent, remains in possession of the Premises after expiration or termination of this Lease, such possession by Tenant shall be deemed to be a month-to-month tenancy terminable by not less than thirty (30) days notice at any given time by either party. The first thirty (30) days of holdover shall bear 125% on Tenant's existing rent and shall have no contingent liability or consequential damages. The next ninety (30) days shall be at 150% of the then prevailing rent with contingent liability.

All provisions of this Lease shall apply to the month-to-month tenancy.

26) **TENANT IMPROVEMENT ALLOWANCE:** Landlord to "Turn Key" the premises using a Tenant Allowance of $34.00/GSF based upon an agreeable Tenant Improvement plan. Tenant Improvement costs exceeding the $34.00/GSF allowance will be the responsibility of the Tenant. Tenant has the option to reimburse the Landlord for the additional costs above and beyond the Tenant Allowance or the Landlord can amortize the excess amount of the Tenant Improvement expenses over the term of the lease using a straight-line, (5%) six percent, fixed interest basis.

Tenant Allowance will be used towards hard and soft costs, including but not limited to: construction, Landlord's architectural and engineering, permitting and planning fees. All design, permit, oversight, fees, etc. costs shall be included in the "Turn Key" which Landlord is providing for Tenant.

If the Tenant uses only a portion of the $34.00/GSF Tenant Allowance, the unused portion shall be used by Tenant for additional tenant improvements within the first year of the Term.
Tenant will return the Premises in the condition it was delivered at Lease Commencement, except for normal wear and tear. Landlord and Tenant (prior to installation) to agree to those items that would require restoration, if any.

27) TRADE FIXTURES. All trade fixtures installed by Tenant in the Leased Premises shall be the property of Tenant and shall be removable at the expiration or sooner termination of the term of this Lease or any renewal or extension thereof, provided Tenant shall not at such time be in default under any covenant or agreement contained in this Lease and that Tenant shall promptly repair any damage to the Demised Premises caused by such removal. If Tenant fails to remove any such trade fixtures upon expiration or sooner termination of the term of this Lease, such trade fixtures shall be deemed abandoned and shall become the property of Landlord or, at the option of Landlord, may be removed from the Demised Premises and stored for the account of Tenant, at the cost and expense of Tenant, which cost and expense shall constitute Additional Rent. Any lighting fixtures, heating and air conditioning equipment, plumbing and electrical systems and fixtures and floor covering shall not be deemed to be trade fixtures whether installed by Tenant or by any other party and shall not be removed from the Demised Premises but shall upon installation become the property of Landlord without any compensation to Tenant.

28) SIGNS: Following Landlord's consent, Tenant shall have the right to place on the Leased Premises, at locations selected by Tenant, any signs which are permitted by applicable zoning ordinances and private restrictions. Landlord may refuse consent to any proposed signage that is in Landlord's opinion too large, deceptive, unattractive or otherwise inconsistent with or inappropriate to the Leased Premises or use of any other tenant. Landlord shall assist and cooperate with Tenant in obtaining any necessary permission from governmental authorities or adjoining owners and occupants for Tenant to place or construct the foregoing signs. Tenant shall repair all damage to the Leased Premises resulting from the removal of signs installed by Tenant.

29) PARKING: During the term of this Lease, Tenant shall have the non-exclusive use in common with Landlord, other tenants of the Building, their guests and invitees, of the non-reserved common automobile parking areas, driveways, and footways, subject to rules and regulations for the use thereof as prescribed from time to time by Landlord. Landlord reserves the right to designate parking areas within the Building or in reasonable proximity thereto, for Tenant and Tenant's agents and employees.

30) BROKERS: Tenant represents that Tenant was not shown the Premises by any real estate broker or agent and that Tenant has not otherwise engaged in, any activity which could form the basis for a claim for real estate commission, brokerage fee, finder's fee or other similar charge, in connection with this Lease.

31) ABANDONMENT: If Tenant shall abandon or surrender the Premises, or be dispossessed by process of law or otherwise, any personal property belonging to Tenant and left on the Premises shall be deemed to be abandoned, or, at the option of Landlord, may be removed by Landlord at Tenant's expense.
32) **BANKRUPTCY:** Landlord and Tenant each agree that if the estate created hereby shall be taken in execution, or by other process of law, or if Landlord or Tenant shall be declared bankrupt or insolvent, according to law, or any receiver be appointed for the business and property of either the Landlord or Tenant, or if any assignment shall be made of either the Landlord's or Tenant's property for the benefit of creditors, then and in such event this Lease may be cancelled at the option of the other party upon sixty (60) days prior written notice.

33) **DEFAULT:** The occurrence of any of the following shall constitute a default by Tenant ("Event of Default"):

   (a) Failure to pay Rent within seven (7) days of the Due Date. Such default shall entitle Landlord to all remedies hereunder, including immediate termination of this Lease and may not be cured by subsequent payment; or

   (b) Failure to perform any other provision of this Lease if the failure to perform is not cured within seven (7) days after notice has been given to Tenant. If the default cannot reasonably be cured within seven (7) days, Tenant shall not be in default if Tenant commences to cure the default within such seven (7) day period and thereafter diligently and in good faith proceeds to cure the default within a reasonable time thereafter.

34) **REMEDIES:** Landlord shall have the following remedies after the occurrence of an Event of Default by Tenant:

   (a) Landlord may terminate this Lease. No act by Landlord other than written notice to Tenant shall terminate this Lease. Acts of maintenance, efforts to relet the Premises, termination of Tenant's right to possession or appointment of a receiver shall not constitute a termination of this Lease. Upon termination, Landlord shall be entitled to recover from Tenant all accrued Rent at the time of termination.

   (b) Either with or without terminating this Lease, Landlord may immediately or at any time after the Event of Default or after the date upon which this Lease shall expire, reenter the Premises or any part thereof, without notice, either by summary proceedings or by any other applicable action or proceeding, or by force or otherwise (without being liable to indictment, prosecution or damages therefore), and may repossess the Premises and remove any and all of Tenant's property and effects from the Demised Premises.

   (c) Landlord may cure the default at Tenant's cost. The sum paid by Landlord shall be due immediately from Tenant to Landlord and bear interest at the rate of interest specified in Paragraph 6 above.

   (d) Landlord shall have the right to recover the rental and all other amounts payable by Tenant hereunder as they become due (unless and until Landlord has terminated this Lease) and all other damages incurred by Landlord as a result of an Event of Default, including without limitation all attorneys' fees in connection with any Event of Default.

   (e) The remedies provided for in this Lease are in addition to any other remedies available to Landlord at law or in equity by statute or otherwise.

Each of Landlord's remedies provided in this Lease is cumulative and in addition to
any remedies now or hereafter allowed by law. No delay or omission in the exercise of any right or remedy of Landlord shall impair such right or remedy or be construed as a waiver of such breach or waiver of the further breach of the same covenant or condition. The receipt and acceptance by Landlord of delinquent Rent shall not constitute a waiver of any other default and shall not constitute a waiver of any interest and/or late charge due because of the failure to make timely payment.

35) NOTICES: Any notice required or permitted under this Lease shall be deemed sufficiently given or served if sent by United States certified mail, return receipt requested, addressed as follows:

If to Landlord to:

NEET Center Associates LLC
c/o Karl F Pfeifferberger Jr.
1300 Old Plank Road
Mayfield Pa 18433

With required Richard A. Fanucci, Esq.
Copy to: DOH REDACTION

If to Tenant to:

[Tenant]
[Tenant's Address]

36) PERFORMANCE: If there is a default with respect to any of Landlord's covenants, warranties or representations under this Lease, and if the default continues more than fifteen (15) days after notice in writing from Tenant to Landlord specifying the default, Tenant may, at its option and without affecting any other remedy hereunder, cure such default and deduct the cost thereof from the next accruing installment or installments of rent payable hereunder until Tenant shall have been fully reimbursed for such expenditures, together with interest thereon at a rate equal to the lesser of twelve percent (12%) per annum or the then highest lawful rate. If this Lease terminates prior to Tenant's receiving full reimbursement, Landlord shall pay the unreimbursed balance plus accrued interest to Tenant on demand.

37) COMPLIANCE WITH LAW: Tenant shall comply with all laws, orders, ordinances and other public requirements now or hereafter pertaining to Tenant's use of the Leased Premises. Landlord shall comply with all laws, orders, ordinances and other public requirements now or hereafter affecting the Leased Premises.

38) CONSENT: Any consent required by either Landlord or Tenant shall not be unreasonably delegated or withheld, unless otherwise set forth herein.
39) **QUIET ENJOYMENT:** Tenant, subject to the terms of this Lease, and upon payment of all rents and performance of all covenants and terms of this Lease, shall peacefully and quietly hold and enjoy the Premises for the term and during the times granted hereby, without interruption by Landlord or any other person lawfully claiming through or under Landlord.

40) **TENANT’S REMEDIES:** Landlord's failure to perform any term, condition or provision of this Lease, if the failure to perform is not cured within thirty (30) days after notice has been given to Landlord, shall entitle Tenant to the following remedies:

(a) Tenant may terminate this Lease; however, termination may occur in the event Landlord fails to begin remedying any non-monetary default within 60 days of written notification to Landlord of the same.

41) **WAIVER OF JURY TRIALS:** THE PARTIES HERETO SHALL AND THEY HEREBY DO WAIVE TRIAL BY JURY IN ANY ACTION, PROCEEDING OR COUNTERCLAIM BROUGHT BY EITHER OF THE PARTIES IN ANY MANNER CONNECTED WITH THIS LEASE, THE RELATIONSHIP OF LANDLORD AND TENANT, TENANT’S USE OR OCCUPANCY OF THE PREMISES AND/OR ANY CLAIM OF INJURY OR DAMAGE.

42) **TIME IS OF THE ESSENCE:** Time is of the essence for each provision of this Lease.

43) **MISCELLANEOUS:**

(a) The captions and paragraph numbers appearing in this Lease are inserted only as matter of convenience and in no way define, limit, expand or describe the scope or intent of such paragraphs or sections of this Lease, nor in any way affect this Lease.

(b) This Lease shall inure to the benefit of the successors and assigns of Landlord and shall be binding upon the successors and permitted assigns of Tenant. If Landlord sells or transfers all or any portion of the Premises, Landlord shall be released from any liability thereafter accruing under this Lease.

(c) One or more waivers of the breach of any covenant or condition by the Landlord shall not be construed as a waiver of the further breach of the same covenant or condition.

(d) Neither this Lease nor a memorandum hereof shall be recorded. This Lease contains all of the agreements of the parties hereto and cannot be amended or modified except by written agreement of the parties. This Lease shall be construed and interpreted in accordance with the laws of the State of Missouri. This Lease may be executed in counterpart and, when all counterpart documents are executed, the counterparts shall constitute a single binding instrument.

(e) The submission of this Lease to Tenant shall not be construed as an offer, nor shall Tenant have any rights with respect hereto unless and until Landlord shall execute a copy of this Lease and deliver same to Tenant.

(f) All obligations of Tenant under this Lease which accrue on or before the date of
expiration, termination or cancellation, survive such expiration, termination or cancellation.

(g) If any provision of this Lease or its application to any specific situation shall be invalid or unenforceable to any extent, the remainder of this Lease or the application thereof to situations other than that as to which it is invalid or unenforceable, shall not be affected and shall be deemed valid and enforceable to the fullest extent permitted by law.

44) SUCCESSORS: The provisions of this Lease shall extend to and be binding upon Landlord and Tenant and their respective legal representatives, successors and assigns.

45) FINAL AGREEMENT: This Agreement terminates and supersedes all prior understandings or agreements on the subject matter hereof. This Agreement may be modified only by a further writing that is duly executed by both parties.

IN WITNESS WHEREOF, the parties hereto have executed this Lease as of the day and year first above written.

TENANT: Keystone Center of Integrative Wellness LLC
By: [Signature]
Name: Chris Julas
Title: CIO

LANDLORD:

NEET CENTER ASSOCIATES, LLC
By: [Signature]
Name: [Name]
Title: [Title]

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COMMERCIAL LEASE AGREEMENT

THIS LEASE, entered into this 20 day of March, 2017, by and between Artanor LLC and/or their assignees, 21 State Street Carlisle suite 101 PA Commonwealth of Pennsylvania 17701 (hereinafter referred to as “LESSOR”), and Keystone Center of Integrative Wellness of 26 State Avenue Suite 102, City of Carlisle, County of Cumberland, Commonwealth of Pennsylvania, 17013 (hereinafter referred to as "LESSEE").

WITNESSETH:

1. PREMISES. Approximately 4000 square feet (+/-) of commercial retail space located at 773 South Franklin Street Wilkes Barre, Commonwealth of Pennsylvania 18702 (hereinafter referred to as “Demised Premises”) for use as a wellness center being conducted by the LESSEE.

2. TERM. This is a 84 month NNN lease (hereinafter referred to as “Lease”). The term of this Lease shall be from April 30, 2017, to February 28, 2023, unless sooner terminated as provided or permitted herein.

   A. Rent commences upon LESSOR’s receipt of Certificate of Occupancy and any of LESSEE’s free or discounted rent periods have ended.

3. RENT. The payment of rent is payable in advance on or before the first day of each month without offset or demand except as otherwise provided herein. The schedule of rent is as follows:

   Years 1-7: To be negotiated after final construction costs; not to exceed $5,000.00/month.

   RENEWAL OPTION: Two (2) five (5) year options available as follows: 7% increase over base rent.
4. **RENT PAYMENT.** LESSEE shall make all checks payable to Artanor, LLC and/or their assignees, and mail them to the following address: 21 State Street Carlisle Suite 101, PAESSEE shall make payment on or before the first of each month. There shall be a five (5) day grace period in payment of rent. If payment is not received within this time, LESSEE shall pay a late fee of Five and 00/100 Percent (5%) per week if payment is not received.

5. **ENTRANCES.** LESSEE shall have unrestricted use and access to designated parking areas, entrances, passage ways, and delivery lanes, and easements adjacent to the Demised Premises.

6. **UTILITIES.** Utilities mean water, sanitary sewer service, heating fuels, natural gas (if available), telephone service, and electrical service (hereinafter referred to as “Utilities”). LESSOR will ensure that the Utilities are properly connected to the Demised Premises in adequate supply, supplied directly by the utility providers, and separately metered (no sub meters). LESSEE will pay directly to the utility providers all deposits and charges required to initiate service and all charges for all Utilities used by LESSEE on the Demised Premises. LESSOR will be responsible for any Utilities charges that have accrued prior to the move-in date. LESSEE will have no obligation to pay to LESSOR any charges or fees billed to LESSOR by any utility provider, except as specifically stated in this Lease.

7. **MAINTENANCE RESPONSIBILITIES.** During the term of this Lease, LESSEE will maintain and keep in good repair and replace when reasonably necessary for the safe and lawful use of the Demised Premises (i) all components of the building on the Demised
Premises, including the roof, interior and exterior walls, gutters, downspouts, doors, door closers, glass in windows and doors, light bulbs, light fixtures, flooring maintenance and repairs, bathroom fixtures, ceiling tile repair/replacement, the electrical system, the plumbing system, the heating and air conditioning system, the structural elements, and (ii) the parking, service, access areas, and (iii) landscaped areas, including grass covered areas, and storm water facilities, including retention ponds, except for, as to (i), (ii) and (iii) of this Paragraph 7, damage due to casualty or condemnation. LESSOR has the right and responsibility to enter the Demised Premises periodically, at any reasonable time, to inspect the condition of the Demised Premises and to make repairs with proper notice.

8. **REAL ESTATE TAXES AND ASSESSMENTS.** LESSOR shall pay at its cost and expense all real estate taxes, assessments (including special assessments), and charges of a similar nature, which may be levied by any governmental entity with respect to the Demised Premises. LESSEE shall reimburse LESSOR on a monthly basis by including said reimbursement with the monthly rental payment. Real estate taxes may be subject to an increase or decrease after the current year based upon a reassessment and LESSEE shall be responsible for any such increases or decreases after receiving notification of such from LESSOR. LESSOR shall have the right, but not the obligation, to appeal re-assessment.

9. **CASUALTY INSURANCE.** LESSOR agrees to maintain fire, casualty, and extended coverage insurance on the building in an amount equal to the replacement cost of the Demised Premises. LESSEE shall reimburse LESSOR on a monthly basis by including said reimbursement with the monthly rental payment. Insurance costs may be subject to an increase
or decrease after the current year and LESSEE shall be responsible for any such increases or
decreases after receiving notification of such from LESSOR.

10. **LIABILITY INSURANCE.** At all times LESSEE occupies the Demised
Premises, LESSEE shall, at its sole cost and subject to the terms of this Lease, carry and maintain
comprehensive general liability insurance insuring LESSEE against claims for bodily injury,
wrongful death, or property damage occurring in the Demised Premises with combined minimum
policy limits of One Million and 00/100 Dollars ($1,000,000.00) per occurrence. LESSEE may
provide the insurance herein required in any blanket policy or policies which it currently carries.
LESSOR shall be named as an additional insured under LESSEE'S insurance subject to the
provisions of this Lease. Upon occupancy, LESSEE shall provide LESSOR with a photocopy of
the Certificate of Insurance as evidence of such coverage.

11. **CONTENT INSURANCE.** LESSEE shall be responsible for any insurance on
LESSEE’S contents that LESSEE desires.

12. **COMMON AREA MAINTENANCE (“CAM”).** CAM shall include items such
as snow and ice removal, grass cutting/landscaping, exterior lighting, sealcoat/striping the parking
lot, general “paper pick-up”, and general grounds keeping. LESSEE shall be responsible for the
CAM of the Demised Premises.

13. **HVAC PREVENTATIVE MAINTENANCE.** LESSEE shall keep in force a
maintenance contract covering the heating, ventilating, and air conditioning system. The contract
shall provide for quarterly servicing of all such equipment and shall be with a contractor reasonably
acceptable to LESSOR. LESSEE shall provide LESSOR with a copy of the maintenance contract
at any time upon request by LESSOR. LESSEE is responsible for regular maintenance costing up
to Five Hundred and 00/100 Dollars ($500.00) per repair with regard to any heating, ventilation and air-conditioning systems.

14. **ASSIGNMENT AND SUBLETTING.** LESSEE may assign or sublease this Lease; provided that any such assignment or sublease is approved in advance, in writing, by LESSOR. Any new lessee shall be responsible to provide business history and financial information to LESSOR prior to consideration for approval. LESSOR’S consent shall not be unreasonably withheld. LESSOR reserves the right to require personal guarantees, or to approve of assignment or subleasing on the basis of non-release of LESSEE herein from its obligations hereunder. After such subletting or assignment, the word “LESSEE” as used herein shall also mean any such subtenant or assignee. If, at time during the term of this Lease, LESSEE does not need all of the originally agreed upon square footage, LESSOR will assist in finding a suitable tenant to sublet; however, no rent or other reimbursements due from LESSEE shall be abated until space is subleased.

15. **SIGNS.** LESSEE shall have the right for sign that is made available by LESSOR and will become LESSEE'S responsibility and expense. LESSOR shall have final approval as to style, type, design, and location of any signage as proposed by LESSEE. No window displays and signs shall be displayed outside of the building and/or in the parking lot without prior written approval from LESSOR. Said signage to meet all necessary local codes and to be done at the expense of the LESSEE.

16. **DAMAGE TO BUILDING.** If all of or any portion of the Demised Premises shall be condemned by lawful authority as unsafe or unfit for use or if it becomes partially or wholly destroyed or damaged by fire or other casualty such as to render it untenantable, this lease shall, at the option of either party, terminate unless the Demised Premises can be repaired or restored.
within one hundred fifty (150) days following such occurrence. During any such reconstruction period, the Lease shall be continued, but the any applicable rent payments shall be abated during the period of time while the Demised Premises cannot be occupied. Should the Demised Premises be damaged but remain tenantable, LESSOR shall immediately repair the damage and there shall be an equitable abatement of rent during the period of repair or restoration.

17. **DEFAULT.** Each of the following events shall constitute an Event of Default by LESSEE under this Lease, unless the LESSOR consents thereto in writing:

   A. LESSEE fails to pay any installment of rent or any other sums due to LESSOR under this Lease when due and the failure continues for fifteen (15) days after LESSEE receives written notice of default from LESSOR;

   B. LESSEE fails to perform or observe any other material agreement or condition on its part to be performed or observed and LESSEE fails to commence to cure the default within fifteen (15) days after receipt of notice of the default from LESSOR or having commenced to cure such default, LESSEE fails to diligently pursue the curing of the default thereafter;

   C. LESSEE vacates the Demised Premises or removes or attempts to remove or manifests an intention to remove any goods or property therefrom otherwise than in the ordinary and usual course of business without having first paid and satisfied the LESSOR in full for all rent and other charges then due and that may thereafter become due until the expiration of the term of this Lease;

   D. LESSEE voluntarily dissolves or any action is taken pursuant to any state or federal law applicable to the LESSEE which would cause the LESSEE to cease permanently and conduct of its business or the filing of a petition by or against LESSEE for adjudication as a
bankruptcy or insolvency or for reorganization or for the appointment of a receiver or trustee of LESSEE of its property or an assignment for the benefit of LESSEE’S creditors or the taking of possession of the Demised Premises by any government officer or agency pursuant to statutory authority for the dissolution or liquidation of LESSEE’S business; and/or

E. Acceptance by LESSOR of any rent or any other sum due hereunder at any time after the same shall become due or default has been made in the payment thereof or any failure by LESSOR to enforce any of LESSOR'S rights under this Lease shall not in any way be construed as a waiver of the right to enforce the same and such right may be enforced without any notice whatsoever.

In the event of the occurrence of any aforementioned Event of Default, LESSOR shall be entitled to take such action as LESSOR deems advisable, from time to time, to remedy or cure such default of any LESSEE obligation, and all remedies of LESSOR shall be supplemental and cumulative to and not in limitation of any and all remedies otherwise available to LESSOR under the laws of the Commonwealth of Pennsylvania and may be exercised and enforced concurrently and whenever and as often as occasion therefore may arise. LESSOR, in an attempt to cure an Event of Default, may take the following action:

A. Declare the whole rent and all other sums due hereunder for the balance of the term of this Lease, or any part thereof, at the option of the LESSOR, immediately due and payable and in arrears as if by the terms of this lease the same were payable in advance;

B. Immediately proceed to distain, collect or bring action for the whole rent or such part thereof as aforesaid as being rent in arrears or file a proof of claim in any bankruptcy or insolvency proceeding for such rent or institute any other proceedings, whether similar to the foregoing or not, to enforce payment thereof;
C. Pursue any remedy elsewhere provided in this Lease for default by the LESSEE otherwise available in law or at equity;

D. Upon no less than five (5) days after LESSEE has received written notice of default, LESSOR may terminate this Lease and in such event, LESSOR may commence eviction proceedings; which proceedings shall not defeat or limit the exercise of any other remedy of LESSOR hereunder;

E. Release the Demised Premises as a whole, or in part, for such term or terms and upon such conditions as LESSOR may reasonably determine and LESSEE shall be liable for any loss of rent for the balance of the term of this Lease and any other losses, costs or damages suffered by the LESSOR (including tax, insurance and CAM charges), with any rents received therefore to be applied first to the payment of such reasonable expenses as the LESSOR may have incurred under the terms and covenants of this Lease, the balance, if any, to belong to the LESSOR and to be taken as liquidated damages for the breach of this Lease by LESSEE;

F. Recover any damages, costs or expenses suffered or incurred as a result of any breach of this Lease by LESSEE; and/or

G. Recover from LESSEE all reasonable attorneys’ fees whether or not suit has been commenced as a result of an Event of Default or in enforcing the provisions of this Lease.

18. **QUIET POSSESSION.** LESSOR covenants that it will put LESSEE into complete and exclusive possession of the Demised Premises, free from all orders, restrictions and notices of any public or quasi-public authority, and that if LESSEE shall pay the monthly rent and performs all of the covenants and provisions of this Lease, the LESSEE shall, during the term of this Lease and any renewal periods, freely, peaceably and quietly occupy and enjoy the full
possession of the Demised Premises, and the tenements and appurtenances thereto belonging, and the rights and privileges granted without hindrance.

19. **HOLDING OVER.** Any holding over by LESSEE beyond the original term of this Lease or any renewal period thereof shall give rise to a tenancy from month to month on the same terms and conditions contained herein. Rent during any holdover period shall be 150% of the rent due for the immediately preceding period.

20. **LEASE SUBORDINATION.** LESSEE hereby agrees that the Lease, and any extensions and modifications hereof, shall be subordinate to any pledge of mortgage or other lien voluntarily placed on the Demised Premises by LESSOR, whether currently existing or at any time placed in the future, including any modifications or replacements of such mortgages or liens. LESSOR shall not be obligated to obtain an independent subordination of Lease from LESSEE in such events. LESSEE further agrees to timely execute any Estoppel Agreement, confirming the then current status of this Lease, upon presentment by LESSOR.

21. **ENTIRE AGREEMENT.** This instrument and its attachments, if any, contain the entire agreement between the parties and there are no covenants, expressed or implied, except as contained herein. No statement, promise or inducement made by either party or agent of either party that is not contained in this written agreement shall be valid or binding. No waiver of any condition or covenant of this Lease by either party shall be deemed to imply or constitute a further waiver of the same or any other condition or covenant of the Lease. This Lease may not be modified, amended or supplemented except by an agreement in writing signed by LESSOR and LESSEE.

22. **CAPTIONS.** All captions and headings are for convenience of reference only and in no way shall be used to construe or modify the provisions set forth in this Lease.
23. **BINDING EFFECT.** All covenants and agreements of this Lease will extend to and be binding upon the heirs, devisees, executors, administrators, successors in interest and assigns of both LESSOR and LESSEE.

24. **JURISDICTION.** LESSOR and LESSEE hereby expressly waive any right to a jury trial in any such action or proceeding. LESSOR and LESSEE further agree that any suit, action or proceeding, whether by claim or counterclaim, brought or instituted by either party hereto directly or indirectly with respect to this Lease shall be brought in and only in the Court of Common Pleas of Luzerne County, Commonwealth.

25. **SEVERABILITY.** If any term of this Lease is to any extent illegal, incapable of being enforced, invalid or otherwise shall become invalid in the future, such term shall be excluded to the extent of such invalidity or unenforceability. All other terms hereof shall remain in full force and effect and, to the extent permitted and possible, the invalid or unenforceable term shall be deemed replaced by a term that is valid and enforceable and that comes closest to expressing the intention of such invalid or unenforceable term.

26. **COUNTERPARTS.** This Lease may be signed in multiple counterparts, each of which shall be deemed an original.

27. **DIGITAL SIGNATURES.** This Lease may be signed by digital signatures, or by original signatures digitally transmitted, all of which shall be legally binding as originals.

28. **OTHER CONDITIONS.** The Demised Premises may not be used as an adult bookstore, adult video store, or any other store presenting, selling or distributing material in any form, which is or may be obscene, or any other noxious use.

A. **LESSOR retains the privilege of final decision of all construction matters.** LESSEE to be responsible for any and all interior build outs.
B. LESSEE will provide LESSOR with the last two (2) years financial statements and tax returns for LESSOR’S review and approval.

C. Landlord to do the following:
   i. Architecture
   ii. Engineering
   iii. Actual construction work from HVAC system, walls/doors, trim work, patch, sealcoat and stripe parking lot, etcetera as to give a completed professional facility. Total square foot is 2,660.00

D. This lease agreement is contingent upon final zoning approval, and other necessary or required governmental approvals.

[REMAINDER OF PAGE IS INTENTIONALLY BLANK]

[SIGNATURE PAGE TO FOLLOW]
IN WITNESS WHEREOF, the parties hereto have hereunto set their hands and seals to this Agreement the day and year first above written.

LESSOR:

[Signature]

By: [Mary P Julius]
Managing Member
Print Name: [Mary P Julius]

LESSEE:

[Signature]

[Keystone Center for Integrative Wellness, LLC]

By: [Signature]
Managing Member
Print Name: [Chris Julius]
## Affidavit of Business History

State of Pennsylvania  
County of Cumberland  

The undersigned, Krista Krebs, 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>
</table>
| Umannaheswar Srilapurapu | Principal  
Principal | Cumberland Apothecary  
3300 Market St.  
Camp Hill, PA 17011  
Adams Discount Pharmacy  
241 N Keswick Ave  
Glenside, PA 19038 | Owner 100%  
Owner 100% | 2016 – Current  
2009 - Current |
| Michael Cranga | Operator | PA Office of Attorney General  
393 Walnut St.  
Harrisburg, PA 17101  
Science Applications International Corporation  
1710 SAIC Dr  
McLean, VA 22102 | Special Agent II / Bureau of Narcotics Investigation & Drug Control  
Special Agent II / Bureau of Criminal Investigations | March 2008 – Present  
June 2006 – March 2008 |
| Michael Dymek | Operator | Walmart Pharmacy  
808 Hunter Hwy  
Tunkhannock, PA 18657  
K-mart Pharmacy  
The Laurel Mall  
5 Laurel Mall Drive  
Hazleton, PA 18202  
Target Pharmacy  
Pocono Commons  
155 Mountaineer Dr.  
Stroudsburg, PA 18360 | Managing Pharmacist  
Managing Pharmacist  
Managing Pharmacist | 2010 – Present  
2008-2010  
2007 - 2008 |
| Emilia Slavova | Employee | Orthopaedic Institute at RHS  
3 W Olive St. #118  
Scranton, PA 18508 | Orthopaedic Nurse Certified (ONC) | July 2014 – Present |
| Employee | Regional Hospital of Scranton  
|          | 746 Jefferson Ave  
|          | Scranton, PA 18510 |
| Employee | Mercy Hospital  
|          | 746 Jefferson Ave  
|          | Scranton, PA 18510 |
| Operator | American Red Cross, Blood Services  
|          | 29 New Commerce Blvd.  
|          | Ashley, PA 18706 |
|          | LPN-float |
|          | Cardiac Rehab Assistant |
|          | Team Supervisor, Preceptor, Collections |
|          | May 2011 – July 2014 |
|          | August 2009 – May 2011 |
|          | Nov 2004 – Dec 2007 |

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]

Date: 3-17-2017

Sworn to and subscribed before me this 17th day of March, 2017.

[Signature]

Notary Public

MY COMMISSION EXPIRES: 1/29/2019
Affidavit of Criminal Offense

State of Pennsylvania

County of Cumberland

The undersigned, Krista Hebs, 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 of Affiant and Title
2-22-2017
Date

Sworn to and subscribed before me this 22nd day of February, 2017.

Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Kent W. Phillips, Notary Public
Carlisle Boro, Cumberland County
My Commission Expires Dec. 27, 2020
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
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 Cumberland ) ss:

I/WE Krista Krebs

For the following applicant:

Keystone Center of Integrative Wellness, LLC
NAME OF BUSINESS

21 State Avenue, Suite 10  888-805-1764
ADDRESS PHONE

Carlisle PA 17013 Cumberland
CITY STATE ZIP CODE COUNTY

hereby certify that the Applicant named has at least $150,000 on deposit with one or more financial institutions:
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

Sworn to and subscribed before me this 17th day of March, 2017.

Notary Public

MY COMMISSION EXPIRES: 1/29/2019

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Nichole Wright, Notary Public
Upper Allen Twp., Cumberland County
My Commission Expires Jan. 29, 2019

A photocopy, facsimile or other electronic version of this document shall be accepted as an original signature.
Attachment J: Sample Medical Marijuana Product Label

Instructions:
- Provide a sample label for each medical marijuana product you expect to produce
- Complete this cover sheet. Scan this sheet and the sample labels and save it as a PDF file called "Attachment J," using the appropriate file name format

<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>Keystone Center of Integrative Wellness, LLC</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Principal Business Address: 21 State Avenue, Suite 102</th>
</tr>
</thead>
<tbody>
<tr>
<td>City: Carlisle</td>
</tr>
<tr>
<td>Phone: 1-888-805-1764</td>
</tr>
</tbody>
</table>
WARNING: Medical Marijuana must be kept in the original container in which it was dispensed. Unauthorized use is unlawful and will subject the purchaser or user to criminal penalties.

WARNING: This product is for medicinal use only. Women should not consume during pregnancy or while breastfeeding except on the advice of the practitioner who issued the certification and, in the case of breastfeeding, the infant’s pediatrician. This product might impair the ability to drive or operate heavy machinery. Keep out of reach of children.

Keystone Center of Integrative Wellness
21 State Avenue Suite 102, Carlisle PA 17013
Permit #: Packaged On:
PRODUCT SAFETY INSERT

Methods for Administering Individual Doses

The method(s) for administration of individual doses/ directions for use of medical marijuana will vary for each product that are necessary from various grower processors

Individual closing instructions can also be affixed here

Potential Dangers Stemming from Medical Marijuana Use

- While lactating, this medication trans ers into breast milk rom the bloodstream Women should not consume during pregnancy or while breast-feeding, except on the advice of the practitioner who issued the certification and, in the case of breast-feeding, the in ant is pediatrician
- his medication should be cautiously prescribed and closely monitored in the geriatric population
- Pediatric patients should only use this medication under the care of a professional and a parent or guardian for the patient
- his product may impair the ability to drive or operate heavy machinery ($1161.23(d)(4))
- As with other drugs, there is a danger o potential problematic usage, dependence or abuse o medical marijuana products
- Medical Marijuana can lower blood pressure and increase heart rate
- Discuss any other potential concerns with your dispensary patient coordinator or the on-site pharmacist/physician or medical pro esional at your local dispensary, or more in guidance about how to recognize signs o problematic usage or contact a drug treatment center

How to Obtain Appropriate Treatment for Problematic Usage

If you are hearing any o the above symptoms, there is a chance that problematic usage could be a problem. It is important to seek professional help. Please contact your dispensary patient coordinator or the on-site pharmacist/physician or medical professional at your local dispensary, or more in information about how to recognize signs o problematic usage or contact a drug treatment center

Side Effects and Contraindications
	his product should not be taken by patients who are known to be sensitive to marijuana or any o the compounds oCannabis
- especially Delta(9)-tetrahydrocannabinol ( THC) o your doctor or pharmacist about any problems you may have had with marijuana in the past

Side effects:
- Most common side effects include: euphoria, dry mouth, orthostatic hypotension (a decrease in blood pressure that happens when you stand up) somnolence, anxiety and anger (chest pain) accelerated heart rate, red eyes, short term memory loss, muscle relaxation, decrease gastrointestinal motility, and somnolence
- Less common side effects include: panic attacks, hyperventilation, red eyes, short term memory loss, muscle relaxation, decreased gastrointestinal motility, and somnolence

Contraindications:
- You should tell your doctor or pharmacist if you are pregnant or may become pregnant while taking this medication.
- This product should not be used in patients with any of the following conditions:
  - Hypersensitivity, allergy, or anaphylaxis to any o the ingredients
  - History of schizophrenia or any related disorders
  - Cardiovascular disease, arrhythmia, uncontrolled hypertension, heart attack, or patients who have had a heart attack or have angina
  - Pregnant or nursing women unless advised to do so by a physician

Drug-Drug Interactions:

Delta(9)-tetrahydrocannabinol ( THC) and cannabidiol (CBD) are the main cannabinoids found in medical marijuana. They may interact with prescription medications such as benzodiazepines, barbiturates, narcotics, antidepressants, and other drugs that may cause drowsiness, enhancing those effects.

CBD may also compete with some prescription medications for the cannabinoid receptor in the brain, reducing the effects of those medications. These include:
- Macrodol antibiotics such as clindamycin and erythromycin
- Antimicrobials such as tetracyclines, fluoxetine, and trimethoprim

Dependence

- Dependence, which may be physical or psychological, re ers to a strong desire to experience the effects o the drug. Marijuana dependence is likely to be mild and does not produce major medical or psychological consequences. Marijuana dependence occurs less o ten than dependence to other drugs, such as nicotine (tobacco) or alcohol. Physical dependence, the person may experience certain symptoms, such as cravings and irritability when the drug is stopped. These symptoms are known as withdrawal syndrome. Addiction is compulsive use and overwhelming involvement with a drug.

Tolerance

- Tolerance may develop to a medication when the medication is used repeatedly. Usually, tolerance develops because metabolism
RELEASE AUTHORIZATION

TO: ______________________________________
(Do not write above this line – For Department of Health Only)

FROM: Keystone Center of Integrative Wellness, LLC

Applicant's Name

I, __________________________, 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 ___, 2017.

Authorized Signatory

STATE OF Pennsylvania
COUNTY OF Cumberland

On this 22nd day of February, 2017, before me, a Notary Public, personally appeared KRISTA KAUL KREBS (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.

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

Kent W. Phillips, Notary Public
Carlisle Borough, Cumberland County
My Commission Expires Dec. 27, 2020

Notary Public

MY COMMISSION EXPIRES: 12-27-2020
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 prefer for issuance of a permit. Not providing Attachment L as part of your medical marijuana organization permit application indicates that you have no preference.
- If you submit this form more than once, the last form the Department receives will represent your prioritization. This form cannot be submitted without being part of an application.
- If you elect to submit this attachment, please scan the completed form and save it as a PDF file called “Attachment L,” using the appropriate file name format.

<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>
<th>Keystone Center of Integrative Wellness, LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trade names and DBA (doing business as) names:</td>
<td></td>
</tr>
<tr>
<td>Principal Business Address:</td>
<td>21 State Avenue, Suite 102</td>
</tr>
<tr>
<td>City:</td>
<td>Carlisle</td>
</tr>
<tr>
<td>State:</td>
<td>PA</td>
</tr>
<tr>
<td>Zip Code:</td>
<td>17013</td>
</tr>
<tr>
<td>Phone:</td>
<td>1-888-805-1764</td>
</tr>
<tr>
<td>Fax:</td>
<td>1-888-883-4507</td>
</tr>
<tr>
<td>Email:</td>
<td>DOH REDACTED</td>
</tr>
</tbody>
</table>

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  
<p>|                          | __ McKean |</p>
<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>First Name:</strong> Rachael</td>
<td><strong>Middle Name:</strong> Dawn</td>
</tr>
<tr>
<td><strong>Occupation:</strong> Assistant Administrator</td>
<td><strong>Last Name:</strong> Tackett</td>
</tr>
<tr>
<td><strong>Title in the applicant’s business:</strong> Chief of Diversity</td>
<td><strong>Suffix:</strong></td>
</tr>
<tr>
<td><strong>Also known as:</strong></td>
<td><strong>Date of birth:</strong> DOH REDACTED</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>First Name:</strong> Umamaheswar</td>
<td><strong>Middle Name:</strong></td>
</tr>
<tr>
<td><strong>Occupation:</strong> Pharmacy owner / Manager / Pharmacist in Charge</td>
<td><strong>Last Name:</strong> Siripurapu</td>
</tr>
<tr>
<td><strong>Title in the applicant’s business:</strong> Chief of Pharmacy</td>
<td><strong>Suffix:</strong></td>
</tr>
<tr>
<td><strong>Also known as:</strong></td>
<td><strong>Date of birth:</strong> DOH REDACTED</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>First Name:</strong> Debra</td>
<td><strong>Middle Name:</strong></td>
</tr>
<tr>
<td><strong>Occupation:</strong> Chief Operations Officer</td>
<td><strong>Last Name:</strong> Altland</td>
</tr>
<tr>
<td><strong>Title in the applicant’s business:</strong> Chief Compliance Officer</td>
<td><strong>Suffix:</strong></td>
</tr>
<tr>
<td><strong>Also known as:</strong></td>
<td><strong>Date of birth:</strong> DOH REDACTED</td>
</tr>
</tbody>
</table>
Employee Qualifications, Description of Duties and Training

Description of the Duties, Responsibilities and Roles of each Principal, Financial Backer, Operator and Employee

**General Responsibilities**

- Responsible for showing up on time; notifying management of any delays or sick days.
- Vacation days set up with manager ahead of time.
- Do not come to work sick.
- Have proper work attire for the various processing areas.
- Maintaining authorization to work in the medical marijuana industry:
  - Background check.
  - No Felonies.
- Understanding your security access status:
  - Knowing where you can and cannot enter (to avoid cross contamination and minimize diversion).
  - Be up to date on security protocols/training (i.e. in case of fire).
- Respecting fellow employees and keeping a positive, productive work environment.
- Following company and Department guidelines for medical marijuana handling.
- Reporting work incidents to proper management.
- Letting production management know when you are taking a break.
- Follow standard operating procedures for the various cultivation, processing and administrative activities; clean work areas before and after each use.

**Principals**

Officers, directors or people who directly or beneficially own securities of the company, or people who have a controlling interest in the company or who has the ability to elect the majority of the board of directors of the company or otherwise control the company, other than a financial institution.

**Role:** Owner(s) have many broad and diverse tasks and responsibilities that are essential for starting and managing a successful business. Depending on the type of business and the stage it is in, the roles and responsibilities change and the owner continually must adapt to thrive.

**Duties and Responsibilities:**

- **Planning and Strategy**
  - A principal(s) business owner is the company's strategist and planner. Implementing a business and marketing plan assists the principal in
understanding the business and identifies the necessary resources and strategies. This requires a great deal of research, planning and writing to develop a plan, that will be revisited and changed as needed.

- **Finance and Accounting**
  - The principal(s) company requires start-up capital to get established and grow their products and services. Some owners can bootstrap and start with a smaller budget, while other ventures require a large investment to fund capital and operational expenditures. Managing accounting procedures requires the owners to set up and maintain business bank accounts, payment processing, accounts payable and accounts receivable, and taxes.

- **Legal**
  - Principal(s) must comply with federal and state business licensing laws. From forming a limited liability company to creating legal contracts, the owner(s) must know basics of the law and have access to an attorney if legal problems with customers or employees arise. In addition, owner(s) may be required to write, review and sign legal contracts and sales agreements.

- **Marketing and Sales**
  - Marketing and sales are essential to drive business. Principle(s) implement marketing and sales strategies that vary widely, depending on the business, and could include tactics such as print advertising, public relations, online marketing, networking, cold calling and commissioned salespeople.

- **Customer Service**
  - During start up, owner(s) are responsible for providing all or most of the customer service duties. These include phone calls, email messages and follow-ups concerning product delivery and quality issues. As the business grows, it makes sense to automate and hire customer service people when possible to scale operations and growth.

- **Human Resources**
  - As the business grows, so do its hiring needs to accommodate more orders and faster growth. The owner(s) needs to identify human resources needs, write job descriptions, screen and interview candidates, train, manage and pay employees.
Financial Backers
Investors, mortgagees, bondholders, note holders, or other source of equity, capital or other assets other than a financial institution.

**Role:** Monitor the company’s financial wellbeing and assist the company as requested from management regarding access to capital, deal formation and financial planning.

**Duties and Responsibilities:**

- Maintain a Good Moral Character and status as an upstanding citizen within their community and the community at large.
- Maintain a clean criminal record with no criminal activities.
- Remain compliant with all rules and regulation promulgated by the Commonwealth of Pennsylvania regarding being a financial backers within the medical marijuana program.
- Promote the company within the Commonwealth of Pennsylvania
- Lend guidance and area of expertise when requested by the company.
- Assist the company as it grows both operationally and financially.
- Help direct the company to maintain solid financial performance and prudent financial decision making regarding capital allocation.

Operators
This section includes Individuals who directly oversee or manage the day-to-day business functions for the company and have the ability to direct employee activities onsite and offsite or within the facility.

Chief Executive Officer

**Krista Krebs**

**Reports to:** Board of Advisors

**Job Description:** Responsible for overseeing the organization and accomplishing program-specific goals and objectives and balancing objectives internally and externally in order to strengthen and sustain Keystone Center of Integrative Wellness, LLC.

**Duties and Responsibilities:**

- Provides general oversight of all activities, manages day to day operations and assures a smoothly functioning, efficient organization.
- Represent Keystone Center of Integrative Wellness, LLC by attending events such as public meetings and conferences and acts as the chief spokesperson for the organization.
- Works in conjunction with Chief Financial Officer CFO) in preparing budgets.
• Analyzes risks prior to making any major purchases or investments for the company.
• Assures filing of all legal and regulatory documents and monitors compliance with relevant laws and regulations.

Chief Financial Officer

Krista Krebs

Reports to: Chief Executive Officer

Job Description: The CFO is responsible for directing the fiscal functions of the corporation in accordance with generally accepted accounting principles issued by the Financial Accounting Standards Board, the Securities and Exchange Commission, and other regulatory and advisory organizations and in accordance with financial management techniques and practices appropriate within the industry. This position is responsible for the direct supervision of the controller and the indirect supervision of all employees in the accounting and finance department. This is a full-time position, with occasional evening and weekend work may be required as job duties demand.

Duties and Responsibilities:

• Directs daily financial business operations and implements financial policies, accounting system and cost controls.
• Directs the implementation of improved work methods and procedures to ensure financial record systems are maintained in accordance with generally accepted accounting standards and in compliance with state, federal and Department of Health (DOH) regulations.
• Directs the management of accounting information systems including payroll, accounts payable, accounts receivable, general ledger, financial reporting, and statistical reporting systems.
• Ensures maximum third party reimbursement through efficient billing and collections operations and effective accounts receivable management.
• Assists the Executive Director/Administrator in the preparation of the annual budget, monitors allocation of funds within budgetary limitations, prepares budget variation reports for the review and approval of the executive director and governing body.
• Protects the assets of the organization through effective internal controls, internal auditing, insurance coverage, and direct supervision of financial operations.
• Ensures proper utilization of Facility resources through control of cash disbursements through an effective accounts payable system.
• Prepares and files periodic financial statements for internal users, authorized third parties and regulatory agencies on an ongoing basis.
• Evaluates financial provisions of proposed contracts and agreements for provision of services to optimize financial viability of the agreements.
• Gathers, collates, and reports key operating statistics through the effective utilization of information systems.
• Provides leadership in strategic financial planning including identifying opportunities for improved fiscal viability.
• Prepares and reports applicable federal, state and local taxes.
• Prepares the financial component of the annual report on organization activity.
• Directs payroll practices and collaborates with other members of the management team in establishing personnel policies that assures compliance with state and federal regulations, including wages, salaries and benefit regulations.

Chief Marketing Officer/Chief Strategy Officer

Mary Pat Julias

Reports to: Chief Executive Officer

Job Description: Reporting directly to the Chief Operating Officer, the Chief Strategy Officer (CSO) assists with developing, communicating, executing, and sustaining strategic initiatives. S/he will focus on accelerating organization performance through cohesive strategy planning and execution, knowledge management and the implementation of an organizational dashboard for impact and organizational effectiveness. The CSO is responsible for formalizing the company’s strategic-planning processes, and leading the development of the strategy, translating it for people across functions and business units, and drive organizational change forging new working relationships and synergies across the organization, and establishing greater transparency and accountability for those people carrying out the company’s strategy. In addition, the CSO is responsible for assessing whether strategic initiatives, at all levels of the organization, are in line with the company’s standards and objectives.

Duties and Responsibilities:

• Leads the development of the strategic plan/framework for the organization, and the detailed current year operating plan, while adhering to direction set by the CEO and Board of Directors. This includes formalizing and leading the strategic planning process, focusing on long term trends and outlook, and competitive intelligence.
• Facilitates the execution of the strategy by working collaboratively with the other Executive Team members and ensuring that the strategy is communicated and easily understood by all throughout the organization. Ensures that strategic actions are completed at various levels to achieve desired results
• Ensures that appropriate metrics are in place to measure performance and progress towards strategic goals
• Acts as a key advisor to Chief Executive Officer on critical changes in the competitive landscape, global marketplace and external business environment
• Engages external business and industry experts to learn and influence business strategies, constantly remaining alert and forward-thinking about opportunities and risks in the industry.
• Leads the development and implementation of consistent practices and strategic frameworks across CARE.
• Oversees the development and implementation of a knowledge management infrastructure and leads in the management of organizational knowledge as a strategic asset to further the organization’s goals.
• Leads the organization’s approach to measurement and evaluation with a focus on the creation of an organizational dashboard for impact and organizational effectiveness.

Chief Operating Officer

Aaron Krebs

Reports to: Chief Executive Officer

Job Description: The chief operating officer position will provide the leadership, management and vision necessary to ensure that Keystone Center for Integrative Wellness has the proper operational controls, administrative and reporting procedures, and people systems in place to effectively grow the organization and to ensure financial strength and operating efficiency. The position accomplishes this through a respectful, constructive and energetic style, guided by the objectives of the company.

Duties and Responsibilities:
• Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.
• Provide day-to-day leadership and management to a service organization that mirrors the adopted mission and core values of the company. Bottom line: Build a beautiful company.
• Responsible for driving the company to achieve and surpass sales, profitability, cash flow and business goals and objectives.
• Responsible for the measurement and effectiveness of all processes internal and external. Provides timely, accurate and complete reports on the operating condition of the company.
• Spearhead the development, communication and implementation of effective growth strategies and processes.
• Collaborate with the management team to develop and implement plans for the operational infrastructure of systems, processes, and personnel designed to accommodate the rapid growth objectives of our organization.
• Motivate and lead a high-performance management team; attract, recruit and retain required members of the executive team not currently in place; provide mentoring as a cornerstone to the management career development program.
• Act as lead "client-care officer" through direct contact with every client and partner.
• Assist, as required, in raising additional capital at appropriate valuations to enable the Company to meet sales, growth, and market share objectives.
• Foster a success-oriented, accountable environment within the company.
• Represent the company with clients, investors, and business partners.

Chief Technology Officer/Chief Information Officer

Christopher Julias

Reports to: Chief Executive Officer

Job Description: The Chief Technology Officer (CTO)/Chief Information Officer (CIO) is responsible for overseeing all technical aspects of the company. The CTO works with Executive Management to grow the company through the use of technological resources. Using an active and practical approach, the CTO will direct all employees in IT and IO departments to attain the company’s strategic goals established in the company’s strategic plan.

Duties and Responsibilities:
• Directs daily information system operations including providing direct oversight of the establishment and implementation of information system policies.
• Establish the company’s technical vision and leads all aspects of the company’s technological development.
• Directs the company’s strategic directions, development and future growth.
• Works in a consultative fashion with other department heads, such as marketing, production and operations as an advisor of technologies that may improve their efficiency and effectiveness.
• Conducts research and case studies on leading edge technologies and makes determinations on the probability of implementation.
• Acts as a good steward of Keystone Center of Integrative Wellness, LLC’s resources and ensures control of IT and IO departmental budgets.
• Directs the implementation of improved work methods and procedures to ensure that information systems maintain functional integrity and operate at acceptable performance levels.
• Protects the confidentiality of information contained within the information systems through effective user controls, system auditing and direct supervision of information systems operations.
• Protects facility assets and ensures proper utilization of facility resources by securing software and hardware from unauthorized use and theft and through the protection of copyright agreements.
• Protects the information contained within information systems through the implementation of back-up systems designed to provide duplicate data.
• Ensures information system integration and seamless system functioning that allows flow of data between software applications.
• Works with the management team in identifying unmet information system needs and develops an information system enhancement plan designed to meet those needs.
• Evaluates proposed information system vendor contracts and licensing agreements to minimize the facilities' risk and to optimize financial viability of the agreements.
• Assists the Executive Director/Administrator in the preparation of the information system annual budget and monitors allocation of funds within budgetary limitations.
• Provides leadership in strategic planning including identifying opportunities for improved information systems capabilities.
• Maintains comprehensive working knowledge in the field of information systems and serves as a resource for facility information system users.
• Serves as the primary liaison with information system vendors technical support teams.
• Assists the Executive Director and management team members in software selections.
• Manages other office technical systems including telecommunication systems and general office equipment.
• Recruits, selects, orients new personnel and arranges for in-service education, as appropriate.

Co-Security Advisor

Aaron Krebs/Christopher Julias

Superior: Chief Executive Officer

Job Description: Ensures the security of employees, capital assets, and proprietary information of the organization by providing strategic direction, tactical management, emergency planning, and disaster recovery strategies.

Duties and Responsibilities:
• Creates and distributes security manuals, documents and records procedures for safeguarding proprietary and customer furnished data.
• Performs periodic and random security inspections and prepares security reports as necessary.
• Issues security violation citations as required by inspections.
• Maintains inspection reports and records and advises senior management of deficiencies and remedial/disciplinary efforts to ameliorate deficiencies.
• Prepares personnel actions and forms to request security clearance/special access and maintains records of such requests.
• Briefs incoming staff on security processes and debriefs outgoing staff.
Establishes and maintains procedures on handling, safeguarding and destruction of documents and data in accordance with established processes and appropriate timeliness.

Conduct security awareness training sessions with new staff.

Assists in the implementation and administration of automated security systems.

Maintains records for periodic systems inspections with customer liaisons and other technical professionals.

Protects property from theft, embezzlement, sabotage, fire and accidents.

Investigates and writes reports on accidents, incidents, suspicious activities, safety and fire hazards and other security related situations.

Provides and needed assistance to customers, employees and visitors following the company procedures.

Serves as the training officer to new security staff.

**Medical Director**

**Mia Sumas**

**Reports to:** CEO/COO

**Job Description:** The Medical Director provides oversight and support to the dispensary and administrative staff to help maintain and continuously improve the quality of care provided to Keystone Center of Integrative Wellness, LLC’s qualified and registered patients and caregivers. The Medical Director facilitates education and training activities of dispensary registered agents and identifies and suggests topics for training through observation and evaluation of patient care. The Medical Director develops, organizes, and facilitates education programs for patients, caregivers, board members, and the community at large concerning methods of consumption, cannabinoid profiles, regulation updates, as well as Keystone Center of Integrative Wellness, LLC services and programs. The Medical Director participates in the monitoring of Keystone Center of Integrative Wellness, LLC’s quality assurance program, anticipates and plans for change and meets state and local compliance requirements.

**Duties and Responsibilities:**

- Serves as a resource for information about medical marijuana, ancillary subjects and shares educational resources with dispensary staff and qualified, registered patients and caregivers.
- Assists in developing mechanisms for ensuring a regular flow of educational materials to internal and external audiences.
- Promotes his/her professional development through self-directed and continuing education.
- Develops and organizes community integration events.
- Encourages and facilitates community involvement in the community outreach and integration activities of Keystone Center of Integrative Wellness, LLC.
• Articulates Keystone Center of Integrative Wellness, LLC’s long-term mission to the community and assists the community in achieving realistic understanding of Keystone Center of Integrative Wellness, LLC’s capabilities and services.
• Acts as a community advocate for Keystone Center of Integrative Wellness, LLC.
• Coordinates with administration to monitor Keystone Center of Integrative Wellness, LLC’s quality assurance program.
• Participates in the development and periodic evaluation of policies and procedures and reviews the Policy and Procedure Manual quarterly.
• Ensures dispensary staff is properly trained and informed of changes in policies and procedures.
• Participates in disciplinary actions of the organization when appropriate.
• Organizes, coordinates and monitors the activities of the dispensary staff and ensures the quality and appropriateness of services meets community standards.
• Acquires an understanding of municipal, county, state and federal regulations related to Keystone Center of Integrative Wellness, LLC’s operations and provides feedback to legislators, policy makers and local decision makers on existing and proposed rules and regulations.
• Acquires, maintains and applies knowledge of social, regulatory, political and economic factors that relate to patient care services.
• Participates in Keystone Center of Integrative Wellness, LLC’s budget process to assure the availability of resources for Keystone Center of Integrative Wellness, LLC’s educational programs, materials and functions.

Chief Nursing Director

Emilia Slavova

Reports to: Chief Executive Officer

Job Description: The Chief of Nursing Director is responsible for the overall direction of the dispensary. The Chief of Nursing Director establishes implements and evaluates goals and objectives for quality services which meet and promote the standards of quality and contribute to the total organization and philosophy.

Duties and Responsibilities:

• Coordinates and oversees direct and indirect patient services provided by personnel.
• Provides guidance and counseling to care coordinators and supervisors to assist them in continually improving all aspects of the dispensary, provided through dispensary personnel.
• Assists supervisors in managing clinical teams and planning.
• Provides help in assessment, planning, implementation and evaluation of patients and caregivers to service delivery personnel as indicated.
• Assists the Executive Director/Administrator in the preparation and administration of the dispensary's budget.
• Interprets operational indicators to detect census changes and increases or decreases in volume which could impact staffing levels, revenues or expenses.
• Evaluates performance of supervisors.
• Assists supervisors to develop skills and technique in evaluating the performance of service delivery personnel.
• Conducts annual evaluations of direct reports, or more frequently if indicated.
• Oversees the maintenance of patient records, statistics, reports and records for purposes of evaluation and reporting of dispensary activities.
• Assures proper maintenance of patient records as prescribed and in compliance with local, state and federal laws.
• Maintains or delegates the maintenance of adequate and appropriate inventory supplies and equipment for the provision of patient services.
• Develops implements and evaluates the orientation program for new dispensary personnel. Orients or delegates orientation of new dispensary personnel.
• Plans and implements in-service and continuing education programs to meet education and training needs of dispensary personnel.
• Assists with the evaluation of organization performance via performance improvement program, productivity, quarterly and annual reviews. Assures high quality and safe delivery of services provided through Keystone Center of Integrative Wellness LLC.
• Assists in the development of organization goals. Develops, recommends, and administers Organization policy and procedures.
• Assures compliance with local, state and federal laws regarding licensure and certification of dispensary personnel and, maintains compliance to the State/Local / Federal and Department of Health standards.
• Stays informed about changes in the field of Medical Cannabis and shares information with appropriate dispensary personnel.
• Promotes referrals in the health care community.
• Demonstrates behaviors that support Keystone Center of Integrative Wellness LLC mission and values.
• In the absence of the Executive Director/Administrator, the Chief of Nursing Director will become the acting Executive Director/Administrator and will be vested with authority to act on behalf of the Executive Director/Administrator.
• Assists in Community Outreach programs.
• Other duties as assigned by the Executive Director/Administrator.
• Dispense Medical Cannabis under the direction of Licensed Pharmacist.
• Dispense Medical Cannabis accordingly to state regulations.
• Offer counseling Face to Face /orally to the patient on Medical Cannabis.
• Understand dispensary's electronic software accordingly to state regulations.
• Recognize problematic usage of Medical Cannabis and appropriate services or treatment.
• Understand the proper method or methods for administering doses of Medical Cannabis.
Understand potential dangers stemming from the usage of Medical Cannabis.
Understand side effects and contraindications associated with Medical Cannabis.
Understand how to prevent or deter the misuse of medical cannabis by an individual.
Understand patient safety

Chief Security Officer

Michael Cranga

Reports to: Chief Executive Officer

Job Description: The Chief Security Offer is responsible for securing Keystone Center of Integrative Wellness physical, digital and electronic security requirements, including computer networks. The CSO will be required to handle all threats and institutes appropriate security programs. CSOs are responsible for enhancing and improving physical security and, increasingly, IT security. They must identify organizational protection goals and objectives, ensuring they’re consistent with KWIC organizations’ strategic plans. CSO will work with other executives to decide on the priority of security needs and then spend according to an organization’s financial constraints and directives. CSOs also oversee a network of security directors, managers and staff and work with local, state and federal law enforcement and other security agencies. The CSO will oversee and coordinate security efforts across the company, including information technology, human resources, communications, legal, facilities management and other groups, and will identify security initiatives and standards. The candidate’s direct reports will include the chief information security officer and the director of corporate security and safety.

Duties and Responsibilities:

- Lead operational risk management activities to enhance the value of the company and brand.
- Ensure security is maintained and updated.
- Oversee incident response planning as well as the investigation of security breaches, and assist with disciplinary and legal matters associated with such breaches as necessary.
- Devise policies and procedures regarding areas such as business continuity planning, loss prevention and fraud prevention, and privacy.
- Oversee and coordinate security efforts across the company, including information technology, human resources, communications, legal, facilities management and other groups.
- Identify security initiatives and standards.
- Oversee network of vendors and directors who secure the company's assets
- Oversee safeguarding of intellectual property and computer systems.
- Develop procedures to ensure physical safety of employees and visitors.
- Manage the development and implementation of global security policy, standards, guidelines and procedures.
- Create workplace violence awareness and prevention programs
- Implement video surveillance.
- Prioritize security initiatives.
- Develop network access and monitoring policies
- Maintain relationships with local, state and federal law enforcement and other related government agencies.
- Develop emergency procedures and incident responses.
- Investigate security breaches.
- Implement disciplinary procedures.
- Conduct audits to find holes in security platform.
- Develop risk management assessments.
- Create global security policy, standards, guidelines and procedures to ensure ongoing maintenance of security.

Chief Compliance Officer

Debra Altland

Reports to: Chief Executive Officer

Job Description: The chief Compliance Officer oversees the Corporate Compliance Program, functioning as an independent and objective body that reviews and evaluates compliance issues/concerns within Keystone Center of Integrative Wellness, LLC. The Chief Compliance Officer also oversees the Compliance Office who is responsible for regulatory compliance with state medical marijuana laws as well as municipal regulations applicable throughout all of Keystone Center of Integrative Wellness, LLC’s locations and operations. This position ensures the Board of Directors, management and employees are in compliance with the rules and regulations of regulatory agencies, that company policies and procedures are being followed and that behavior within Keystone Center of Integrative Wellness, LLC meets the company Standards and Conducts. The Chief Compliance Officer along with the Corporate Compliance Team is authorized to implement necessary actions to ensure achievement of the objectives of an effective compliance program.

Duties and Responsibilities:

- Keep informed regarding pending industry changes, trends and best practices and assess the potential impact of these changes on organizational processes.
- Act as staff to the CEO by monitoring and reporting results of the compliance efforts of the company and in providing guidance for the senior management team.
- Develops initiates, maintains and revises policies and procedures for the general operation of the compliance program and related activities.
- Prevent illegal, unethical or improper conduct.
• Consults with the corporate attorney as needed to resolve difficult legal compliance issues.
• Monitors and coordinates compliance activities to remain abreast of the status of all compliance activities and identify trends.
• Report violations of compliance or regulatory standards to duly authorized enforcement agencies as appropriate or required.
• Verify that software technology is in place to adequately provide oversight and monitoring in all required areas.
• Oversee internal reporting systems such as waste disposal, changes in employee information and patient records.
• Review communications such as advertising, signs and labels to ensure there are no violations of standards or regulations.
• Review or modify policies or operating guideline to comply with changes in standards or regulations.
• Conduct or direct the internal investigation of compliance issues.
• Direct the development or implementation of compliance-related policies and procedures.
• Advise internal management on the implementation or operation of compliance programs.
• Provide assistance to internal or external auditors in compliance reviews.
• Monitor compliance systems to ensure their effectiveness.
• Design or implement improvements in communication, monitoring or enforcement of compliance standards.
• Direct environmental programs such as air or water compliance, aboveground or underground storage tanks, spill prevention or control, hazardous waste or materials management, solid waste recycling, medical waste management, indoor air quality, integrated pest management, employee training or disaster preparedness.
• Provide employee training on compliance related topics, policies or procedures.
• Prepare management reports regarding topics compliance operations and progress.
• File appropriate compliance reports with regulatory agencies.
• Maintain documentation of compliance activities such as applications and reports submitted, complaints received or investigation outcomes.
• Coordinate with Keystone Center of Integrative Wellness, LLC’s accountant to collect, reconcile and file taxes for each of Keystone Center of Integrative Wellness, LLC’s entities.
• Prepare patient and caregiver online and pre-orders.
• Provide deliveries a needed.
• Route media calls to the appropriate manager immediately (do not comment unless authorized to do so).
• Assist managers with research, communications or any other assigned projects/tasks.
• Will comply with Keystone Center of Integrative Wellness, LLC’s current policies and procedures and applicable state and local laws.
Quality Assurance/Quality Control Manager

Christopher Julias

Reports to: Owner/CEO

**Job Description:** The Quality Assurance/Quality Control Manager is responsible for the assurance of quality products and processes by establishing and enforcing quality standards in accordance with the State of Pennsylvania and standards set by Keystone Center of Integrative Wellness, LLC. The Quality Assurance Manager develops policies and procedures for testing materials and products. Maintains Keystone Center of Integrative Wellness, LLC staff results by coaching, counseling, planning, monitoring and appraising job results. Serves as a resource for administration and management teams for policy and procedure updates and training.

**Duties and Responsibilities:**

- Establishes quality and reliable standards in accordance with the State of Pennsylvania and all other applicable regulatory agencies.
- Establishes standards for the disposition of finished products by devising evaluation tests, methods and procedures.
- Communicate product and consumer requirements with other members of the Keystone Center of Integrative Wellness, LLC’s management and administration team.
- Establishes raw material standards by studying manufacturing and engineering requirements; conferring and negotiating with suppliers; devising testing methods and procedures.
- Prepares product and process quality reports by collecting, analyzing and summarizing information and trends.
- Achieves financial objectives by preparing the quality assurance budget, scheduling expenditures, analyzing variances and initiating corrective actions.
- Maintains professional and technical knowledge by attending educational workshops, reviewing professional publications and establishing personal networks.
- Develop monthly summary for the General Manager of all quality assurance discrepancies and how the issues have been resolved and/or mitigated.

Chief of Pharmacy Science

Umamaheswar Siripurapu

Reports to: Owner/CEO
**Job Description:** The Chief of Pharmacy Scientist is responsible for management and supervision of the medical marijuana dispensary's day to day activities. Maintains compliance with all Pennsylvania regulations, inventory management, security and record keeping procedures. The Chief Pharmacist will administer and integrate pharmaceutical policies and procedures, plan major service programs and oversee staff supervision and development.

**Duties and Responsibilities:**

- Prepares medications by reviewing and interpreting physician orders; detecting therapeutic incompatibilities.
- Dispenses medications by compounding, packaging and labeling pharmaceuticals.
- Controls medications by monitoring drug therapies and advising interventions.
- Completes pharmacy operational requirements by organizing and directing technicians' work flow; verifying their preparation and labeling of pharmaceuticals; verifying order entries, charges and inspections.
- Provides pharmacological information by answering questions and requests of healthcare professionals; counseling patients and caregivers on drug therapies.
- Complies with all state and federal drug laws a regulated by the board of pharmacy. The DEA and the FDA.
- Protects patients and technicians by adhering to infection-control procedures.
- Recommend appropriate cannabis products, medication procedures and proper dosing in accordance with established guidelines to ensure a positive patient experience.
- Maintains safe and clean working environment by complying with procedures, rules and regulations.
- Maintains pharmacological knowledge by attending educational workshops; reviewing professional publications; establishing personal networks and participating in professional societies.
- Provides outstanding patient care.
- Manage patient flow and activity on the premises.
- Understands and follows all Pennsylvania regulations in regards to medical marijuana.
- Supervises prepacking of drugs and control procedures.
- Maintains a positive and instructional interaction with internal and external customers and employees.

**Pharmacist**

Michael Dymek

**Reports to:** Chief of Pharmacy Science

**Job Description:** The pharmacist is responsible for management and supervision of the medical marijuana dispensary. Maintains compliance with all Pennsylvania...
regulations, inventory management, security and record keeping procedures. Processes provider recommendations for medical marijuana in an accurate and timely manner. Counsels, answers patient inquiries and educates patients on medical marijuana. The role is responsible for safe and efficient methods for coordination of established pharmacy policy concerning drug patient care and provides clinical drug information to meet the needs of the patient.

**Duties and Responsibilities:**

- Prepares medications by reviewing and interpreting physician orders; detecting therapeutic incompatibilities.
- Dispenses medications by compounding, packaging and labeling pharmaceuticals.
- Controls medications by monitoring drug therapies and advising interventions.
- Completes pharmacy operational requirements by organizing and directing technicians' work flow; verifying their preparation and labeling of pharmaceuticals; verifying order entries, charges and inspections.
- Provides pharmacological information by answering questions and requests of healthcare professionals; counseling patients and caregivers on drug therapies.
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- Understands and follows all Pennsylvania regulations in regards to medical marijuana.
- Supervises prepacking of drugs and control procedures.
- Maintains a positive and instructional interaction with internal and external customers and employees.

**Inventory Control Manager**

**Melissa Foreman**

**Reports to:** Chief Compliance Officer

**Job Description:** Responsible for oversight of all inventory management activities and for implementing and enforcing the policies and procedures. Ensure tracking of seed to
sale inventory for all cannabis and cannabis products. The Inventory Control Manager provides support to all Patient Coordinators and Consultants which includes schedules, training, providing policy and procedure updates, product information and keeping updated with industry news. The Inventory Control Manager is also responsible for maintaining the storage areas, ordering and receiving all inventory and products, arranging deliveries and maintaining facility compliance and cleanliness.

**Duties and Responsibilities:**

- Conduct daily, weekly monthly and annual audits of all cannabis and cannabis products
- Identify discrepancies during inventory
- Report any discrepancies identified during inventory to the Chief Compliance Officer
- Oversees and adjusts day-to-day inventory systems based on volume and workflow efficiency
- Acts as an ambassador for Keystone Center of Integrative Wellness, LLC brand and provides superior service and communication with vendors
- Maintain the inventory control system
- Keep informed regarding pending industry changes, trends and best practices and assess potential impact of these changes on organizational processes
- Work directly with the Chief Compliance Officer to ensure Keystone Center of Integrative Wellness, LLC is compliant with all medical marijuana regulations

**Chief of Maintenance/Project Manager**

**David Altland**

**Reports to:** CEO/CFO

**Job Description:** Direct supervisor to project manager responsible for coordinating, planning, and directing designated projects to ensure that goals or objectives of projects are accomplished within prescribed time frame and funding parameters by performing the following duties personally or through subordinate supervisors. Responsible for the oversight and compliance of the upkeep of buildings, grounds and equipment. Responsible for maintaining electrical, plumbing, and mechanical related systems.

**Duties and Responsibilities:**

- Direct Supervisor of the Project Manager
- Reviews project proposals or plans to determine time frames, funding limitations, procedures for accomplishing project, staffing requirements and allotment of available resources to various phases of the project.
- Established work plans and staffing for each phase of the project and arranges for recruitment of assignment of project personnel.
• Confers with project staff to outline work plans, assign duties, responsibilities and scope of authority.
• Directs and coordinates activities of project personnel to ensure project progresses on schedule and within prescribed budget.
• Reviews status reports prepared by project personnel and modifies schedules or plans as required.
• Prepares project reports for management, client and others.
• Confers with project personnel to provide technical advice and to resolve any issues.
• Coordinates project activities with activities of government regulatory or other governmental agencies.

**Project Manager**

**Trace Hall**

**Reports to:** Chief of Maintenance/Project Manager

**Job Description:** Plans, directs and coordinates activities of designated projects to ensure that goals or objectives of projects are accomplished within prescribed time frame and funding parameters by performing the following duties personally or through subordinate supervisors.

**Essential Job Functions/Responsibilities:**

• Reviews project proposals or plans to determine time frames, funding limitations, procedures for accomplishing project, staffing requirements and allotment of available resources to various phases of the project.
• Established work plans and staffing for each phase of the project and arranges for recruitment of assignment of project personnel.
• Confers with project staff to outline work plans, assign duties, responsibilities and scope of authority.
• Directs and coordinates activities of project personnel to ensure project progresses on schedule and within prescribed budget.
• Reviews status reports prepared by project personnel and modifies schedules or plans as required.
• Prepares project reports for management, client and others.
• Confers with project personnel to provide technical advice and to resolve any issues.
• Coordinates project activities with activities of government regulatory or other governmental agencies.

**Human Resource Director**

**Dianna Jedlowski**
Reports to: CEO/CFO

**Job Description:** The Human Resources Director is responsible for developing and organizing strategies by identifying and researching human resource issues in accordance with state laws, local laws and standards set by Keystone Center of Integrative Wellness, LLC. The Human Resource Director oversees the Human Resources Manager.

**Duties and Responsibilities:**

- Recruiting, selecting, orienting, training, coaching and counseling staff.
- Develops human resources operations financial strategies by estimating, forecasting and anticipating requirements, trends and variances.
- Supports management by providing human resource advice, counsel and decisions.
- Explores opportunities to add value to job accomplishments.
- Responsible for the administration and management of all employee files, including acquisition, evaluation, maintenance and termination.
- Responsible for providing human resources materials to employees and submitting completed documentation to the appropriate recipient.
- Ensure all license and permits for Keystone Center of Integrative Wellness, LLC are current and in compliance with state and local laws.
- Administers all licenses and permit renewals in a timely fashion, ensures posting of all licenses and permits and ensures all licenses and permits are current.
- Ensures all documentation and reports are in good standing with the Secretary of State.
- Serves as a resource for all employees concerning human resources, policies and procedures, industry news and regulations.
- Coordinates with the General Manager and Executive Management Team to ensure accurate information is communicated to all employees.
- Maintain accurate records of all Keystone Center of Integrative Wellness, LLC human resources and compliance activities in accordance with state and local Pennsylvania laws and standards set by Keystone Center of Integrative Wellness, LLC.

**Human Resource Manager**

**Janelle Callahan**

Reports to: Human Resource Director

**Job Description:** The Human Resources Manager is responsible for the administration and management of all human resource and compliance activities of Keystone Center of Integrative Wellness, LLC in accordance with all state laws, local laws and standards set by Keystone Center of Integrative Wellness, LLC. The Human Resource Manager
provides support for all Keystone Center of Integrative Wellness, LLC employees, including human resource materials and records, acquisition and termination materials and records, training materials and records, policy and procedure updates and industry compliance updates. The Human Resource Manager is responsible for administrating and maintaining timely and accurate records of all human resource and compliance activities.

**Duties and Responsibilities:**

- Responsible for the administration and management of all employee files, including acquisition, evaluation, maintenance and termination.
- Responsible for providing human resources materials to employees and submitting completed documentation to the appropriate recipient.
- Ensure all license and permits for Keystone Center of Integrative Wellness, LLC are current and in compliance with state and local laws.
- Administers all licenses and permit renewals in a timely fashion, ensures posting of all licenses and permits and ensures all licenses and permits are current.
- Ensures all documentation and reports are in good standing with the Secretary of State.
- Serves as a resource for all employees concerning human resources, policies and procedures, industry news and regulations.
- Coordinates with the General Manager and Executive Management Team to ensure accurate information is communicated to all employees.
- Maintain accurate records of all Keystone Center of Integrative Wellness, LLC human resources and compliance activities in accordance with state and local Pennsylvania laws and standards set by Keystone Center of Integrative Wellness, LLC.

**Chief Diversity Officer**

Rachael Tackett

**Reports to:** CEO

**Job Description:** The Chief Diversity Officer will lead the development and implementation of proactive diversity, equity and inclusion initiatives which will support the Company’s new strategic plan, currently in development. The Chief Diversity Officer will lead the development of a vision and effective strategy that focuses on the importance and value of a diverse and inclusive Company environment. The Chief Diversity Officer will assess potential barriers and develop strategies focused on recruiting and retaining a diverse workforce. The Chief Diversity Officer will design training initiatives on cultural competency, gender differences, veteran’s affairs, disability, sexual harassment, and other topics designed to increase awareness, support equity and inclusion values, and maintain compliance with applicable laws. The Chief Diversity Officer will also lead and oversee compliance in regards to Affirmative
Duties and Responsibilities:

- Plans, guides and advises executive officers on diversity, equity, and affirmative action matters. Collaborates with management to create, implement and monitor programs designed to ensure fair and equitable treatment of staff.
- Supervises professional/support staff. Hires, evaluates, trains, disciplines and recommends dismissal of staff as necessary.
- Develops and implements district-wide training to promote cultural understanding and competency and a climate of equity and inclusion.
- Directs the work of professional staff that assists with EEO investigations as a result of discrimination and harassment complaints filed by students, faculty, staff and administrators. Evaluates documentation provided and advises individuals and departments on appropriate action(s) to be taken. Provides mediation, as needed. Ensures written report of investigatory findings and disposition are prepared and maintain in a confidential file.
- Promotes Company commitment to a climate of equity and inclusion through interaction with individuals and agencies inside and outside the Company including the Board of Directors, Executive Staff, supervisory staff, employees, public, community leaders from all ethno-cultural groups, civic and grass-root organizations, attorneys, political figures, and Federal, State, and local government enforcing authorities.
- Gathers researches and analyzes data for use in statistical calculations and reporting in order to meet federal and state requirements, including creating workforce analysis reports.
- Communicates and articulates Equal Employment Opportunity and Affirmative Action policies for the general public, governmental enforcing agencies, political and community group leaders.
- Participates in and advises the Company’s recruitment and retention of underrepresented groups. Monitors, evaluates, and assesses adequacy of diversity of candidates in the hiring and screening process. Works with Human Resources to develop recruitment strategies that attract underrepresented candidates.
- Manages the department budget, including developing budget proposals, justifying expenses and monitoring accounts.
- Provides analysis of legislation and regulations related to equity and affirmative action.
- Performs other related duties as assigned.

Community Outreach Manager

Lauryn Mencer

Reports to: Chief Diversity Officer (CDO)
**Job Description:** The community Outreach Manager will be responsible for planning, development and implementation of all of Keystone Center of Integrative Wellness, LLC's marketing strategies, marketing communications and public relations activities both internal and external. Maintains and develops social media sites, website content and design, advertisements, newsletters and any other marketing materials for Keystone Center of Integrative Wellness, LLC. Directs the efforts of the Keystone Center of Integrative Wellness, LLC staff to coordinate Keystone Center of Integrative Wellness, LLC involvement in community and industry events. Serves as a community outreach representative to plan and coordinate Keystone Center of Integrative Wellness, LLC involvement in community and industry events and programs. Manages internal communications including email accounts, Keystone Center of Integrative Wellness, LLC intranet and social media. Responsible for handling all marketing and press inquiries for Keystone Center of Integrative Wellness, LLC.

**Duties and Responsibilities:**

- Maintains and develop social media sites, website content and design, advertisements, newsletters and any other marketing materials for Keystone Center of Integrative Wellness, LLC
- Coordinate media interest in Keystone Center of Integrative Wellness, LLC and ensure regular contact with target media and appropriate response to media requests
- Oversees development and implementation of support materials and services for programs and chapters in the areas of marketing, communications and public relations
- Act as the organization’s representative with the media and press
- Coordinate media interest in the organization and ensure regular contact with target media and appropriate response to media requests
- Direct the development or implementation of compliance-related policies and procedures throughout the organization
- Effectively enable volunteers and staff so they can take action on behalf of Keystone Center of Integrative Wellness, LLC by transmitting the Keystone Center of Integrative Wellness, LLC’s values, vision, mission and direction
- Engage people in the mission of Keystone Center of Integrative Wellness, LLC; respecting and using the skills, expertise, experience and insights of people
- Provide direction and resources, removing barriers and helping develop people’s skills
- Articulate expectations and clarifying roles and relationships
- Anticipate conflicts and facilitates resolutions ensuring quality decision-making

**Chief of Human Service Programs**

**Nicole Moyers**

**Reports to:** CEO
**Job Description:** The Chief of Human Services Program will serve as a core member of the agency’s leadership team, support the Board’s Program Committee and lead the agency’s development and delivery of high-impact programs and initiatives. The chief of Human Service Programs will oversee the administrative and day-to-day operations of human service departments for their organization. Their duties include organizing the employees needed for the life cycle of a project; ensuring employees’ professional conduct in all relations with clients, third parties, and other employees; and making sure projects' revenue and budget goals are met. They also assist in the creation of program management plans and budgets, monitor employee progress (potentially including those in off-site offices), and delegate tasks to employees and third parties assigned to a program. This key leadership position serves as a core member of the agency’s Management Team and promotes effective coordination with the agency’s fiscal, development, human services resources operations. This position represents KCIW with key governmental and external partners in strategic meetings and planning work at the systems level.

**Duties and Responsibilities:**

- Ensure that KCIW develops and delivers high-impact, culturally responsive and effective programs that fulfill the agency mission.
- Ensure assigned staff members are proficient in the tasks necessary for their work; ensure that the agency adopts and incorporates “best practices”.
- Ensure that staff are able to provide culturally competent services to all clients; and work to implement continuous quality improvement methods.
- Research and develop resources to launch, sustain and expand effective programming and to meet the unique needs of clients who cannot be served within the mainstream service system.
- Respond according to established agency procedures to client-initiated complaints; Respond according to established agency procedures to grievances concerning staff.
- Represent the agency in community forums, meeting and task forces. Advocate for additional resources and programs.
- Support the Board of Directors in their governance role by providing training, information, reports and recommendations on the agency’s programs and by staffing the Board’s Program Committee.
- Coordinate effectively across agency departments and functions to ensure alignment of agency services and resources and compliance with policies.
- May prepare and evaluate grant proposals and contracts.
- Evaluate programs and suggest modifications/improvements.
- Oversee human services program processes, including recruitment, orientation, scheduling, quality service delivery, compliance and fiscal responsibility.

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**Patient Care Coordinator**
Christina Casses, Tiffany Cribbs, Nicholas Morelli, Todd Radaci

Reports to: Chief Diversity Officer

Job Description: The Patient Counselor must provide superior customer service and educational guidance to registered patients and caregivers. The Patient Counselor must maintain a thorough understanding of medical marijuana varieties, derivatives and infused products based on current offerings in the Pennsylvania market and current cannabis science. The Patient Counselor must maintain a professional appearance, organized work environment and facility appearance.

Duties and Responsibilities:

- Greets patients and caregivers as they enter the dispensary.
- Provides orientation and tours for first time patients.
- Communicate with Patient Coordinator to maintain patient traffic flow, minimize wait times and maximize ales and patient satisfaction.
- Responds to and resolve patient requests, complaints or compliments.
- Maintains organization of sales station. And dispensary through daily upkeep and light cleaning.
- Maintain quality and appearance of product through organization and checking for defective mold, mildew, expiration dates or defective products.
- Maintains knowledge of all medicine, products and services provided, as well as applicable state and local laws.
- Educates patients and caregivers on medicating options and methods, strain information, medicine effectiveness for specific ailments and cultivation methods.
- Provides educational materials and resources for patients and caregivers as needed.
- Record specific requests, preferences and notifications for patients and caregivers using the inventory system
- Maintains awareness of patient input and suggests changes to improve service or product.
- Collects payments ad processes transactions after order verification.
- Applies transaction amount to each customer’s allocated amount in accordance with state and local laws.
- Packages and labels products appropriately prior to handing to customer.
- Provides receipt for each transaction.
- Ensures accurate information is recorded for all patient and caregiver registration, sales and preferences.
- Communicate inventory levels with Assistant Manager to maintain accurate menus and update menus as needed.
- Coordinate with the General Manager as needed.
Description of the Employee Qualification of each Principal, Financial Backer, Operator and Employee

All Personnel

• Can verify the candidate has a valid and current form of identification such as driver’s license, Commonwealth issued ID, passport or other form satisfactory to the Department. § 1141.29 (b)(6)(i).

• Can verify the candidate is of good moral character and reputation in the form of a written statement. § 1141.29 (b)(6)(ii) & 1141.29 (b)(14)(i).

• Can provide a valid and current copy of a criminal history records check and fingerprints from the Pennsylvania Commonwealth Police. § 1141.29 (b)(6)(iii) & 1141.31 (a).

• Can provide an affidavit setting forth the following: (A) Any position of management or ownership held during the past 10 years 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; and (B) Whether the principal, operator, financial backer or employee has been convicted of a criminal offense graded higher than a summary offense. § 1141.29 (b)(6)(iv).

• Can provide: (i) the names, residential addresses, titles and short version of a curricula vitae of each principal of the corporation or limited liability company, (ii) a certified copy of the filed articles of incorporation of the corporation or filed certificate of organization of the limited liability company, and (iii) unless the corporation or limited liability company is a publicly traded company, the names and mailing addresses of all persons owning securities in the corporation or membership interests in the limited liability company; if the principal, operator or financial backer candidate is a corporation or limited liability company. § 1141.29 (b)(7).

• Can provide: (i) the names, residential addresses, titles and short version of a curricula vitae of each partner and general partner of a general partnership, limited partnership, limited liability partnership or limited liability limited partnership, and if any of the partners is a corporation or a limited liability company, the names, residential addresses, titles and short version of a curricula vitae of each principal of that corporation or limited liability company, (ii) a certified copy of its filed certificate of limited partnership or other formation document, if applicable, (iii) a certified copy of its partnership agreement, and (iv) unless the entity is a publicly traded company, the names and mailing addresses of each of its partners; if the principal, operator or financial backer candidate is a general partnership, limited partnership, limited liability partnership or limited liability limited partnership. § 1141.29 (b)(8).
• Can provide evidence of any criminal action under the laws of the Commonwealth or any other Commonwealth, the United States or a military, territorial or tribal authority, graded higher than a summary offense, against the candidate, or which involved the possession, transportation or sale of illegal drugs, or which related to the provision of marijuana for medical purposes, including any action against an organization providing marijuana for medical purposes in which the candidate either owned shares of stock or served as an executive, and which resulted in a conviction, guilty plea or plea of nolo contendere, or an admission of sufficient facts, if applicable. § 1141.29 (b)(9)(v).

• Can provide evidence of any civil or administrative action under the laws of the Commonwealth or any other state, the United States or a military, territorial or tribal authority relating to the candidate’s profession, or occupation or fraudulent practices, including fraudulent billing practices, if applicable. § 1141.29 (b)(9)(vi).

• Can verify, under penalty of perjury, that the information provided by the candidate is accurate and correct.

• Can verify the candidate is 18 years of age or older. § 1151.21 (b)(2).

• Bilingual (English/Spanish) applicants strongly preferred.

• Excellent communication skills and attention to detail.

• Effective time management and ability to multitask.

• Proficiency in Windows based software and point of sale applications.

• Ability to work in a fast-paced, changing and challenging environment.

• Thorough understanding of Commonwealth and local medical marijuana laws and how they apply to the operations of the company.

**General Dispensary**

• Candidates must have a minimum of a Bachelor’s degree, preferably in business.

• Candidates must be able to work cohesively as a team with all personnel.

• Candidates must have the ability to function with little to no supervision.

• Candidates must have problem-solving skills, attention to detail, and good communication skills. Ability to analyze information and think critically.

• Candidates must have an aptitude for written and verbal communication. Report writing and data collecting are mandatory.

• Candidates must have strong time management and multi-tasking skills are required.

• Candidates must have the ability to pay attention to details as needed to complete measurements, enter data and to meet quality control requirements.

• Candidates must have the ability to follow standard operating procedures, adapt to changes and become incorporated into established daily routines.

• Candidates must be cannabis friendly and passion about cannabis medicine.
Principals

- Can verify the candidate is current in all tax obligations due and owed, and have no outstanding tax obligations, to the Commonwealth. § 1141.27 (c)(2).
- Can provide evidence, in the form of tax clearance certificates issued by the Department of Revenue and the Department of Labor and Industry under § 1141.27, that the candidate is in compliance with all the laws of the Commonwealth regarding the payment of Commonwealth taxes. § 1141.29 (b)(9)(iv).

Operators

Chief Executive Officer

- Preferred Bachelor’s degree with a minimum of 3 years’ experience in a senior management position
- Previous experience in a management role
- A self-starter and team player
- Extensive experience in the cannabis industry
- Demonstrate strong knowledge of the business
- Ability to work well with people to resolve or prevent conflicts
- Highly refined interpersonal skills and ability to communicate publicly
- Ability to take in a large amount of information and develop a big-picture perspective in order to make precise and strategic decisions regarding the direction of the company
- Ability to handle detailed and complex problems
- Ability to balance multiple tasks simultaneously
- Ability to make rapid decisions regarding administrative issues
- Ability to plan and meet deadlines
- Ability to maintain a flexible work schedule to meet the demands of executive management

Chief Financial Officer

- 5 years experience in Accounting, Finance, Business Administration or related field
- Preferred Bachelor's or Masters degree in Accounting, Finance, Business Administration or related field, CPA
- Has at least three to five years of experience in health care financial management preferably in private duty operations. Information systems knowledge required.
- Demonstrates an ability to supervise and direct professional and administrative personnel.
- Has knowledge of corporate business management, governmental regulations and DEPARTMENT OF HEALTH (DOH) standards.
- Demonstrates good communications and public relations skills.

**Chief Marking Officer/Chief Strategy Officer**

- Bachelor’s degree in Science related field
- A minimum of 10 years’ experience in strategic planning.
- Seasoned professional, with a strong strategy orientation, who has previously held several business and operational roles in fast paced and complex environments. Work experience should include success in a period of growth and/or transition.
- Ability to apply a variety of strategic frameworks to analyze problems and to guide and develop solutions.
- Ability to translate and communicate complex topics in a variety of forums, tailoring communications to effectively fit and influence the targeted audience; strong executive presence, presentation and communication skills.
- Ability to leading the entire range of problem solving work from problem definition to analysis, recommendation and the development of implementation plans.
- Ability to influence on a global and virtual stage, demonstrating courage, an approachable style and inspiring confidence
- Ability to bridge cultural boundaries and norms to overcome barriers and improve outcomes.
- Ability to work collaboratively with key internal and external leaders, partners, suppliers and customers
- Master’s Degree or an equivalent combination of a Bachelor’s degree and experience.
- Proven track record with strategy planning, development, and execution

**Chief Operating Officer**

- Preferred Bachelor’s degree in business management or related business field, with a Master’s degree being preferred.
- Candidate must have minimum of 8 years of experience in a position with executive management experience and responsibilities.
- Candidate must be flexible and able to multitask; can work within an ambiguous, fast-moving environment, while also driving toward clarity and solutions; demonstrated resourcefulness in setting priorities and guiding investment in people and systems. At least five years in a senior management role.
- Demonstrated experience in financial planning and analysis with previous experience overseeing human resources, information technology, and legal.
- Skilled in organizational development, personnel management, budget and resource development, and strategic planning.
- Excellent people skills, with an ability to partner with a dynamic leadership team.
- Possess personal qualities of integrity, credibility, and commitment to corporate mission.
• Flexible and able to multitask; can work within an ambiguous, fast-moving environment, while also driving toward clarity and solutions; demonstrated resourcefulness in setting priorities and guiding investment in people and systems.
• Business Acumen.
• Decision Making.
• Financial Management.

Chief Technology Officer

• BS in related field with at least 5 year’s management and strategic experience in the IT arena
• Demonstrates the ability to supervise and direct professional and administrative personnel
• Has knowledge of corporate business management
• Demonstrates good communications and public relations skills

Co-Security Advisor

• Maintaining Client Relationships
• Intruder Detection,
• Knowledge of Information Security Policies
• Excellent Verbal Communication Skills
• Attention to Detail
• Reporting Skills
• Law enforcement background or
• Security clearance management experience (e.g. Facility Security Officer)

Medical Director

• Must hold a Doctorate in Medicine including but not limited to
  o Family Medical Care
  o Occupational Health
  o Emergency Care
  o Neurological Studies
• At minimum 5 years of experience in the medical field
• Analytically and communicatively intelligent
- Ability to identify training and informational deficiencies and respond by implementing specific measures to counter these inadequacies.
- Thorough understanding of state and local medical marijuana laws and how they apply to Keystone Center of Integrative Wellness, LLC
- Market and political knowledge.
- Excellent communication skills and attention to detail
- Effective time management and ability to multitask
- Proficiency in Windows based software and point of sale applications
- Ability to work in a fast-paced, changing and challenging environment
- Extensive knowledge about different cannabis strains, concentrates and edibles
- Ability to focus simultaneously on short and long term goals and ability to identify problems quickly.
- Experienced in a leadership role with training and community outreach responsibilities.

Chief Nursing Officer

- Practitioner Licensure and Registration by the Commonwealth of Pennsylvania
- National Certification accredited CRNP Program
- Prefer minimum 2 years CRNP experience preferred
- Valid/Current ACLS Certification
- Has three years of management experience
- Complies with accepted professional standards and practice
- Must be a licensed driver with an automobile that is insured in accordance with state and dispensary requirements and is in good working order.
- Has satisfactory references from current employers and professional peers
- Has excellent observation and communication skills
- Is self-directed with the ability to work with little supervision
- Is flexible and cooperative in fulfilling obligations
- Has satisfactory references from current employers and professional peers
- Has excellent observation and communication skills
- Is self-directed with the ability to work with little supervision
- Is flexible and cooperative in fulfilling obligations

Chief Security Officer

- An advanced degree in business or come into the position with significant security experience
- Background in Law Enforcement
- Computer training (if CSO is responsible for IT security in their organizations)
- 5 years of leadership experience is required.
- Certifications in IT security
• Management experience with multiple large teams
• Excellent communication, persuasion, and public-speaking skills
• Must have strong working knowledge of pertinent law and the law enforcement community

Chief Compliance Officer

• Bachelor’s degree in related field preferred; or 7 years of experience relating quality compliance
• Previous experience in healthcare to include demonstrated leadership
• Familiarity with operations, financial, quality assurance and human resource procedures and regulations preferred
• Excellent analytical skills
• Understanding of PA state medical marijuana laws
• Ability to comprehend complex legislature and apply implications on the operations of Keystone Center of Integrative Wellness, LLC
• Strong communication skills are required, as the Compliance Officer will be responsible for maintaining dialogue and relationships with the state department officials, law enforcement, landlords and city personnel as well as the directors, management and employees of Keystone Center of Integrative Wellness, LLC
• Ability to follow established policies and procedures and contribute to the development of new concepts, policies and procedures as necessary

Quality Assurance/Quality Control Manager

• Bachelors of Science degree in Microbiology or similar field; Master’s degree preferred
• Strong communication and leadership qualities. Exhibits a sense of urgency when necessary.
• Ability to direct, coach, support and delegate tasks to Keystone Center of Integrative Wellness, LLC management, administration and agent teams
• Ability to issue and explain instructions effectively
• Demonstrated experience in a position requiring critical-thinking, problem solving, planning and assessment
• Computer literacy in word processing, point-of-sale systems and data base management
• Commitment to working with shared leadership in cross-functional teams
• Strong oral and written communication skills
• Ability to manage multiple people at a time

Chief of Pharmacy Science
- Bachelors of Science in Pharmacy from an accredited school of Pharmacy
  - PHD Preferred
- Licensure and registration by the Board of the Commonwealth of Pennsylvania
- Previous supervisory experience
- Exceptional people skills
- Excellent organizational skills
- Extensive knowledge of different cannabis strains, concentrates and edibles and the ability and willingness to become an expert in medical marijuana
- Ability to compound a variety of drugs and medicines with accuracy
- Ability to maintain safe dispensary practices and procedures

Pharmacist

- Licensure and registration by the Board of the Commonwealth of Pennsylvania
- B.S. in Pharmacy
- Exceptional people skills
- Excellent organizational skills
- Extensive knowledge of different cannabis strains, concentrates and edibles and the ability and willingness to become an expert in medical marijuana
- Ability to compound a variety of drugs and medicines with accuracy
- Ability to maintain safe dispensary practices and procedures

Pharmacist

Michael Dymek

Reports to: Chief of Pharmacy Science

Job Description: The pharmacist is responsible for management and supervision of the medical marijuana dispensary. Maintains compliance with all Pennsylvania regulations, inventory management, security and record keeping procedures. Processes provider recommendations for medical marijuana in an accurate and timely manner. Counsels, answers patient inquiries and educates patients on medical marijuana. The role is responsible for safe and efficient methods for coordination of established pharmacy policy concerning drug patient care and provides clinical drug information to meet the needs of the patient.

Duties and Responsibilities:

- Prepares medications by reviewing and interpreting physician orders; detecting therapeutic incompatibilities.
• Dispenses medications by compounding, packaging and labeling pharmaceuticals.
• Controls medications by monitoring drug therapies and advising interventions.
• Completes pharmacy operational requirements by organizing and directing technicians’ work flow; verifying their preparation and labeling of pharmaceuticals; verifying order entries, charges and inspections.
• Provides pharmacological information by answering questions and requests of healthcare professionals; counseling patients and caregivers on drug therapies.
• Complies with all state and federal drug laws a regulated by the board of pharmacy. The DEA and the FDA.
• Protects patients and technicians by adhering to infection-control procedures.
• Recommend appropriate cannabis products, medication procedures and proper dosing in accordance with established guidelines to ensure a positive patient experience.
• Maintains safe and clean working environment by complying with procedures, rules and regulations.
• Maintains pharmacological knowledge by attending educational workshops; reviewing professional publications; establishing personal networks and participating in professional societies.
• Provides outstanding patient care.
• Manage patient flow and activity on the premises.
• Understands and follows all Pennsylvania regulations in regards to medical marijuana.
• Supervises prepacking of drugs and control procedures.
• Maintains a positive and instructional interaction with internal and external customers and employees.

Inventory Control Manager

• Previous experience in a compliance role with managerial responsibilities
• Fierce attention to detail
• Excellent communication skills and attention to detail
• Working knowledge of the cannabis industry
• Effective time management and the ability to multitask
• Must maintain a professional appearance, organized work environment and facility appearance
• Demonstrate strong product knowledge
• Intermediate level computer skills with good with MS Office Suite (Outlook, Word and Excel)
• Ability to work in a fast-paced, changing and challenging environment
• Proficiency in Windows based software and point of sales applications
• Excellent analytical skills and thorough understanding of state and local medical marijuana laws and how they apply to Keystone Center of Integrative Wellness, LLC
Chief of Maintenance/Project Manager

- 5 years of leadership experience is required.
- Management experience with multiple large teams
- Excellent communication, persuasion, and public-speaking skills
- Associates degree or equivalent from a two-year college or technical school; or six months to one year related experience and/or training; or equivalent combination of education and experience.
- Ability to read, analyze and interpret general business periodicals, professional journals, technical procedures or governmental regulations.
- Ability to write reports, business correspondence and procedure manuals.
- Ability effectively present information and respond to questions from groups of managers, clients, customers and the general public.
- Excellent people skills with an ability to partner with a dynamic leadership team
- Possess personal qualities of integrity, credibility and commitment to corporate mission
- Ability to work mathematical concepts such as probability and statistical inference and fundamentals of plane and solid geometry and trigonometry.
- Ability to apply concepts such as fractions, percentages, ratios and proportions to practical situations.
- Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists.
- Ability to interpret a variety of instructions in written, oral diagram or schedule form.

Project Manager

- Associates degree or equivalent from a two-year college or technical school; or six months to one year related experience and/or training; or equivalent combination of education and experience.
- Ability to read, analyze and interpret general business periodicals, professional journals, technical procedures or governmental regulations.
- Ability to write reports, business correspondence and procedure manuals.
- Ability effectively present information and respond to questions from groups of managers, clients, customers and the general public.
- Excellent people skills with an ability to partner with a dynamic leadership team
- Possess personal qualities of integrity, credibility and commitment to corporate mission
- Ability to work mathematical concepts such as probability and statistical inference and fundamentals of plane and solid geometry and trigonometry.
- Ability to apply concepts such as fractions, percentages, ratios and proportions to practical situations
• Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists.
• Ability to interpret a variety of instructions in written, oral diagram or schedule form.

Human Resource Director

• Bachelor’s degree in human service field preferred; or equivalent experience
• Previous experience in a position with managerial and human resource responsibilities
• Previous leadership responsibilities
• Superior skills in conflict management and problem solving
• Ability to be discrete and ethical
• Organized files, strong time management skills and personal efficiency
• Thorough understanding of national, state and local medical marijuana laws and how they apply to the operations of Keystone Center of Integrative Wellness, LLC
• Excellent communication skills and attention to detail
• The ability to multi-task
• Ability to work in a fast-paced, changing and challenging environment
• Proficiency in Microsoft-based software

Human Resource Manager

• Superior skills in conflict management and problem solving
• Ability to be discrete and ethical
• Organized files, strong time management skills and personal efficiency
• Thorough understanding of national, state and local medical marijuana laws and how they apply to the operations of Keystone Center of Integrative Wellness, LLC
• Excellent communication skills and attention to detail
• The ability to multi-task
• Ability to work in a fast-paced, changing and challenging environment
• Proficiency in Microsoft-based software

Chief Diversity Officer

• Required - Bachelor’s degree in business or related field or at least five of experience
• Preferred – Master’s degree and at least five years in a senior management role
• A record of leading and/or facilitating the completion of diversity and inclusion initiatives
• Experience in leading efforts in the areas of diversity/inclusion/intersectionality with evidence of increasing responsibility
• Excellent people skills with an ability to partner with a dynamic leadership team
• Possess personal qualities of integrity, credibility and commitment to corporate mission
• Ability to be flexible and able to multi-task; can work within an ambiguous and fast-moving environment while also driving toward clarity and solutions; demonstrates resourcefulness in setting priorities and guiding investment in people and systems
• Ability to work Monday through Friday 8:00am to 4:30pm (flexibility in hours is allowed). This position might require longer hours and frequent weekend work if/as needed
• Some out of town and overnight travel may be expected

**Community Outreach Manager**

• Bachelor's degree in Social Service or related field preferred
• Demonstrate skills, knowledge and experience in the design and execution of marketing, communications and public relations activities
• Strong creative, strategic, analytical, organizational and personal sales skills
• A self-starter and team player
• Experience developing and managing budgets, hiring, training, developing, supervising, appraising personnel
• Demonstrates successful experience writing press releases, making presentations and negotiating with the media
• Experience overseeing the design and production of print materials and publications
• Computer literacy in word processing, data base management and page layout
• Commitment to working with shared leadership and in cross-functional teams
• Strong oral and written communication skills
• Ability to manage multiple projects at a time

**Chief of Human Service Programs**

• Bachelor’s degree or equivalent experience in social services or human services in related field
• Experience and demonstrated success in a leadership or management position with an agency that provides culturally responsive human services.
• Ability to successfully develop and manage a wide variety of effective programs and resources.
• Ability to effectively supervise staff.
• Ability to work successfully within KCIW and with partner agencies to develop services and programs to meet the needs of the people.
• Ability to manage complex program budgets.
• Ability to ensure that programmatic and fiscal contract and grant requirements are met
• Ability to seek out resources and to collaborate on funding proposals.
• Ability to foster team work, inspiration and innovation.
• General work processing, spreadsheet and graphics computer skills.
• Ability to define problems, collect data, establish facts and draw valid conclusions.

**Patient Care Coordinator**

• Previous experience in a high-end sales environment preferred
• Strong attention to detail, organizational skills and time record keeping abilities
• Superior customer service skills
• Previous experience with an inventory and patient management system
• Proficiency in windows-based software, Point of Sale software and internet navigation
• Knowledge of customer marijuana policy and law
• Ability to work in a fast paced, changing and challenging environment
Description of the steps the applicant will take to assure that each principal, financial backer, operator and employee will meet the two-hour training requirement and any medical professional will meet the four hour training under the Act and Regulations

- As a matter of policy, the company will require all principals, financial backers, operators and employees to successfully complete a free, 2-hour, training course developed and offered by the Department covering: the provisions of the act and §1141.48 relevant to the responsibilities of dispensary personnel, proper handling of medical marijuana, proper recordkeeping, how to prevent and detect the diversion of medical marijuana, best practice security procedures, and best practice safety procedures including responding to a medical emergency, fire, chemical spill and a threatening event such as an armed robbery, burglary or criminal incident.

- The company will require each principal, financial backer and operator listed in the initial permit application to complete the training course prior to starting initial operation, and will require any additional principal, financial backer or operator to complete the training course prior to starting work.

- The company will also require each employee who has direct contact with patients or caregivers, or who physically handles medical marijuana, listed in the initial permit application to complete the training course within 90 days after starting work at the facility, and will also require all new employees to complete the training course prior to starting work.

- The company will require each physician, pharmacist, physician assistant or certified registered nurse practitioner, prior to assuming any duties at any of its dispensary locations, to successfully complete a 4-hour training course developed and offered by the Department providing instruction in the latest scientific research on medical marijuana, including the risks and benefits of medical marijuana, and other information deemed necessary by the Department. §1161.25(c).

- The company will retain the attendance records to the training course of all personnel and will make them available for inspection by the Department and its authorized agents upon request.

The company will recertify all principals, financial backers, operators and employees on Department mandated training courses as required.
<table>
<thead>
<tr>
<th>First Name</th>
<th>Middle Name</th>
<th>Last Name</th>
<th>Occupation</th>
<th>Title in the applicant’s business</th>
<th>Also known as</th>
<th>Date of birth</th>
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<tbody>
<tr>
<td>Todd</td>
<td>Vincent</td>
<td>Radaci</td>
<td>Service Coordinator</td>
<td>Patient Care Coordinator</td>
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<td>Janelle</td>
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<td>Callahan</td>
<td>Corporate Benefits and Employee Relations Manager</td>
<td>Human Resources Manager</td>
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<td>Dianna</td>
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<td>Jedlowksi</td>
<td>Director of Human Resources</td>
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<td>Hall</td>
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<td>Employment policies and procedures</td>
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<td>KCIW New Hire Employee Packet</td>
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<td>Principal, Operator and Employee File</td>
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<td>Task Description</td>
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<td>Workplace safety, necessary checks prior to Production</td>
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<td>Contamination Protocols</td>
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<td>Maintenance, Cleaning &amp; Sanitation of the Workplace</td>
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<tr>
<td>Maintenance, Cleaning &amp; Sanitation of the Workplace</td>
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<td>Proper Handling of any Cleaning Supplies</td>
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<td>Quality Assurance Quality Control</td>
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<td>Inventory Control &amp; Reporting Procedures</td>
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<td>Recall Plan</td>
<td>Mar 17, 2017</td>
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<td>Melissa Foreman</td>
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<td>Full &amp; Complete Plan of Operation</td>
<td>Mar 17, 2017</td>
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<td>Identify building code design requirements</td>
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<td>Operations Plan Development</td>
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<td>Personnel Requirements</td>
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<td>Develop initial organizational structure</td>
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<td>Compare organizational structure to</td>
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<td><strong>Marketing, Sales &amp; Distribution</strong></td>
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<tr>
<td>Outline the Objectives, Goals, Strategies</td>
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<td>Develop road map for OGSMA</td>
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<td>Identify potential marketing partners</td>
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<td>Develop financial model &amp; key</td>
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<td>Conduct Strengths, Weaknesses,</td>
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<td>Mar 17, 2017</td>
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<td>Determine the method of distribution</td>
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<td>Develop educational outreach program for</td>
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<td>Develop integrative doctor strategy &amp;</td>
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<td>Mar 17, 2017</td>
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<td>Develop Community Outreach, Workshop</td>
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<td>Framing New Walls</td>
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<td>Rough In Plumbing</td>
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<td>End Date</td>
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<td>Rough In HVAC</td>
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Plan of Operations

Vista Green Consulting Group, LLC
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Disclaimer:
The information contained in this document (“plan”) has been provided by Keystone Center of Integrative Wellness, LLC (the “company”). Information presented in the company’s plan is intended to be used by those skilled in the art, and is subject to change. The plan will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Introduction:
The company intends on developing a flagship dispensary in which to showcase the successful execution of the Pennsylvania Department of Health’s (the “Department”) Medical Marijuana Program. To facilitate this endeavor, the company has created a full and complete plan of operations that includes the following: (1) Employment policies and procedures; (2) Security policies and protocols including: (i) Staff identification measures, (ii) Monitoring of attendance of staff and visitors, (iii) Alarm systems, (iv) Video surveillance, (v) Monitoring and tracking inventory and (vi) Personal security; (3) A process for receiving, processing, packaging, labeling, handling, tracking, transporting, storing, disposing and recalling of medical marijuana and a process for handling, tracking, transporting, storing and disposing of medical marijuana waste in accordance with applicable laws, rules and regulations; (4) Workplace safety, including conducting necessary safety checks prior to starting operations and the dispensing of medical marijuana; (5) Contamination protocols; (6) Maintenance, cleaning and sanitation of equipment in the facility and on the site; (7) Maintenance and sanitation of the dispensary; (8) Proper handling and storage of any solvents or other chemicals used in the cleaning and sanitization of the equipment and facility in accordance with applicable laws, rules and regulations; (9) Quality control, including regulation of the amount of THC in each process lot, proper labeling and minimization of medical marijuana contamination; (10) Inventory maintenance and reporting procedures; (11) The investigation of complaints and potential adverse events from other medical marijuana organizations, patients, caregivers or practitioners regarding the operation of the dispensary or distribution of medical marijuana products; and (12) A recall plan meeting the requirements of §1151.42(d) (relating to complaints about or recall of medical marijuana).

The company will make the full and complete plan of operation available to the Department upon request and during any inspection of the site and facility.

28 Pa. Code § 1161.29

Anti-Diversion Plan

DOH REDACTED
marijuana in the process of preparation, transport, dispensing or analysis shall be housed and stored in such a manner as to prevent diversion.

The provisions outlined herein include strict security measures to prevent employee or third-party theft or transfer of medical marijuana products by a registered patient to an unqualified individual. Supply chain security is designated as a primary job duty of all managers, reinforcing a company-wide culture of responsibility. The general manager will be responsible for the development and implementation of the following Anti-Diversion Plan, with the board of directors responsible for plan oversight.

**Purpose**

The company distributes medical marijuana, which is a controlled substance with many incentives for diversion. Supply chain security is a top priority of the company and a primary job duty of all managers. Diversion includes, but is not limited to employee or third-party theft or transfer of medical marijuana products by a dispensary agent, patient, or caregiver to an unqualified individual. Best practice dictates that the company demonstrates control and security over its controlled substances inventory.

**Company Wide Culture of Responsibility**

The general manager is responsible for the development and implementation of the company's Anti-Diversion Plan. The board of directors is responsible for oversight of the Anti-Diversion Plan. All company employees and patients are responsible to ensure a culture of responsibility and reporting. Any dispensary agent who participates in, allows, or fails to report diversion may be reported to law enforcement and dissociated from the company in accordance with the Employee Manual and the Department Registration Plan.

To foster a culture of responsibility surrounding diversion of medical marijuana products, it is imperative that all departments and managers embrace the plan and share in discrepancy-resolution and diversion-prevention responsibilities. Working together, administration, dispensary and operations personnel shall make recommendations to the general manager regarding the policies and procedures for handling controlled substances.

**Diversion Prevention Procedures**
Compliance and Audit Plan

Compliance Plan Summary
The Compliance Plan describes how to operate a registered medical marijuana dispensary in full compliance with state regulations, local codes, and all laws of Pennsylvania. Procedures for external and internal audits and inspections are detailed. A compliance officer is assigned facility oversight responsibilities, and the general manager will perform random audits of video surveillance footage to perform compliance checks.

All areas of the registered medical marijuana dispensary, all dispensary agents and activities, and all records are subject to Department inspection. Those individuals who will have access to facilities and vehicles transporting medical marijuana immediately upon request are detailed to include representatives of the Department, emergency responders, authorized law enforcement personnel, and local public health, inspectional services, or other permit-granting agents.
Comprehensive written operating procedures are outlined with descriptions of relative sections contained in this plan, which will be updated semi-annually in order to maintain compliance with all laws and regulations that apply to the operation. All employees will have proper training on compliance with state law, medical marijuana use, security, and theft prevention.

Additional measures for ensured compliance include plans for disciplinary action, the acquisition of third-party recommendations, and the application of state laws pertaining to the rights of landlords, employers, law enforcement authorities, and regulatory agencies.

Written Operating Procedures

Detailed Written Operating Procedures Required
The company must implement and maintain a detailed set of operating procedures for each facility. These procedures must include, at a minimum:

- Security measures detailing the Security Plan including employee security policies for personal safety and crime prevention techniques;
- A description of the operation:
  - Hours of operation and after-hours contact information found in the Facilities and General Operations Plan, which must be provided to the Department, shall be made available to law enforcement officials upon request; and
  - Price list for medical marijuana products and any other available products, and alternate price lists for patients with documented verified financial hardship as outlined in the Financial Hardship Plan;
- Storage of marijuana in compliance with 28 Pa. Code § 1161.33 and the Product Storage and Delivery Plan;
- Description of the various forms of medical marijuana to be dispensed in the Products and Pricing Plan and the Manufactured Infused Products Plan.
- Procedures to ensure accurate recordkeeping, including inventory protocols in the Recordkeeping, Reporting, and Notifications Plan;
- Plans for quality control, including product testing for contaminants in compliance with the Quality Control Plan;
- A staffing plan and staffing records in compliance with the Staffing Plan and Recordkeeping, Reporting, and Notifications Plan;
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies in the Incident Response Plan;
- Alcohol, smoke, and drug-free workplace policies in the Employee Manual;
- A plan describing how confidential information will be maintained in accordance with the Recordkeeping, Reporting, and Notifications Plan;
- A description of the dispensary’s patient education activities in accordance with the Patient Management Plan, the Patient Education Plan, and the Community Integration Plan;
• The standards and procedures by which the dispensary determines the price it charges for marijuana, and a record of the prices charged, including the dispensary’s policies and procedures for the provision of medical marijuana to registered qualifying patients with verified financial hardship without charge or at less than the market price, as required by the Products and Pricing Plan and the Financial Hardship Plan;

• Written policies and procedures for the distribution of medical marijuana, which must include but not limited to:
  o Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories in the Inventory Management and Waste Disposal Plan;
  o A procedure for handling voluntary and mandatory recalls of marijuana. Such procedures must be adequate to deal with recalls due to any action initiated at the request or order of the Department, and any voluntary action by a dispensary to remove defective or potentially defective marijuana from the market, as well as any action undertaken to promote public health and safety in the Product Recall Plan; and
  o A procedure for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated medical marijuana is segregated from other medical marijuana and destroyed. This procedure must provide for written documentation of the disposition of the marijuana in the Inventory Management and Waste Disposal Plan.

• A policy for the immediate dismissal of any dispensary agent in the Employee Manual and Personnel Policies who has:
  o Diverted medical marijuana, which must be reported to law enforcement officials and to the Department; or
  o Engaged in unsafe practices with regard to operation of the dispensary which must be reported to the Department; and
  o A list of all board members and executives of a dispensary, and members, if any, of the non-profit corporation, must be made available upon request by any individual in the . This requirement may be fulfilled by placing this information on the Dispensary’s website.

Scheduled Procedure Updates
It is company policy to retain an industry consultant to update this plan semi-annually in order to maintain compliance with all laws and regulations that apply to the company’s operation. A report of recommended changes must be presented to the president at the corporation’s annual meeting. The president must approve any and all changes, except that the general manager and general manager may implement temporary policies as needed to comply with applicable law and regulation.

Change in Law or Regulation Updates
The general manager in coordination with the president must annually review any changes in applicable laws and regulations to determine necessary changes to this plan.
Industry Best Practice Updates
The general manager must review industry standards published by trade groups annually to consider changes to this plan. Examples of such groups include the American Herbal Products Association, American Herbal Pharmacopeia, United States Pharmacopeia, Coalition for Cannabis Standards and Ethics, the Emerald Valley Growers Association, Americans for Safe Access and the National Cannabis Industry Association.

Compliance Training and Reporting
The company must ensure all of its employees have proper training on compliance with state law, medical marijuana use, security, and theft prevention in accordance with the Training Plan. Employees must be required as a condition of employment to report any non-compliant findings to their supervisor or the president (if their supervisor is the subject of the report).

Audits and Inspections

Internal Audits
It is company policy for the general manager to perform annual internal quarterly audits of adherence to all policies and procedures set forth in this plan using the Facility Audit Log as a reporting tool. Due to the small size of the operation, an industry consultant must be retained to perform random and unannounced audits.

Random Audits Required
The general manager must perform a random audit of no less than two hours of video surveillance footage at least quarterly to perform compliance checks for the Visitor Policy, Medical Marijuana Consumption Prohibited Policy, and other visible compliance issues. The president must be presented a quarterly report of internal audit findings prepared by the general manager. The president must mandate any necessary changes required from the findings.

External Inspections
Personnel onsite must grant access to authorized persons listed below in accordance with the Badge Identification and Visitors Policies. When an external party is granted access to the dispensary, the Visitor Log must be updated and the general manager must be notified immediately. The following individuals shall have access to the dispensary or any vehicle transporting medical marijuana for the company immediately upon request:

- Representatives of the Department, in the course of responsibilities authorized by state law – 28 Pa. Code §1141.45;
- Emergency responders in the course of responding to an emergency; and
- Authorized law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.
**Department Inspections**

The Department or its agents may inspect any dispensary facility and affiliated vehicles at any time without prior notice in order to determine the company’s compliance with local and state law. All areas of a dispensary facility, all dispensary agents and activities, and all records are subject to such inspection. Acceptance of a certificate of registration by the company constitutes consent for such inspection.

- Company personnel shall immediately upon request make available to the Department all information that may be relevant to a Department inspection, or an investigation of any incident or complaint.
- Company personnel shall make all reasonable efforts to facilitate the Department’s inspection, or investigation of any incident or complaint, and to facilitate the Department’s interviews of dispensary agents.
- An inspection or other investigation may be made prior to the issuance of a certificate of registration or renewal of registration. Additional inspections may be made whenever the Department deems it necessary for the enforcement of state law.
- During an inspection, the Department may direct a dispensary to test medical marijuana for contaminants as specified by the Department, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of non-organic pesticides. The general manager shall comply with any such orders as soon as possible.

*28 Pa. Code §1141.45*

**Disciplinary Actions and Other Law**

**Compliance Required**

It is company policy to comply with all Department requirements, notifications, orders, and directives upon request. Executive management and the general manager must ensure that all regulations and Department directives are followed in the case of administrative or criminal proceedings.

**Application of Other Law**

- Nothing in state law:
  - Allows the operation of a motor vehicle, boat, or aircraft while under the influence of medical marijuana;
  - Requires any health insurance provider, or any government agency or authority, to reimburse any person for the expenses of the medical use of marijuana;
  - Requires any health care professional to authorize the use of medical marijuana for a patient;
Requires any accommodation of any onsite medical use of marijuana in any place of employment, school bus or on school grounds, in any youth center, in any correctional facility, or of smoking medical marijuana in any public place;

- Requires the violation of federal law or purports to give immunity under federal law; or

- Poses an obstacle to federal enforcement of federal law.

Compliance Plan

Outside Consultants Required
Executive management must obtain third-party compliance and audit recommendations if a Deficiency Statement, order to terminate sales, or any other Department disciplinary notice is received, internal or external audit findings, or other operational issues are indicative of management problems, diversion of medical marijuana, loss, or theft. Legal counsel must be engaged immediately upon notice of administrative citation proceedings.

Plan of Correction
After an inspection in which a violation of state law is observed, the Department shall issue a Deficiency Statement citing every violation identified, a copy of which shall be left with or sent to the Dispensary. The general manager shall be responsible for the plan of correction needed for any deficiency noted.

- The general manager must submit to the Department a written Plan of Correction approved by executive management for any violations cited in a Deficiency Statement issued within 10 business days after receipt of the Deficiency Statement.

- Every Plan of Correction shall state, with respect to each deficiency, the specific corrective step(s) to be taken, a timetable for such steps, and the date by which compliance with state law will be achieved. The timetable and the compliance dates shall be consistent with achievement of compliance in the most expeditious manner possible.

- The Department shall review the Plan of Correction for compliance with the requirements of state law and shall notify the dispensary of either the acceptance or rejection of the plan. An unacceptable plan must be amended and resubmitted within five business days after receipt of such notice.

Order of Sales Limitation
The general manager must ensure that any order from the Commissioner regarding a limitation of sales is followed.

- If the Department determines that a dispensary does not substantially comply with applicable provisions of state law 28 Pa. Code §1161, the Department may order that the dispensary shall not sell medical marijuana, after a date specified, to registered qualifying patients or their personal caregivers.

- The Department shall not make such a determination until a dispensary has been notified that the dispensary does not substantially comply with applicable provisions of state law 28 Pa. Code
§1161, that an order to limit sales is contemplated, and that the dispensary has a reasonable opportunity to correct the deficiencies.

- An order that a dispensary shall not sell medical marijuana may be rescinded when the Department finds that the dispensary is in substantial compliance with the applicable provisions of state law 28 Pa. Code §1161.

Summary Cease and Desist Orders and Quarantine Orders
A summary cease and desist order or quarantine order may be imposed by the Department prior to a hearing, in order to immediately stop or restrict operations by a dispensary, and/or to protect the public health, safety, or welfare. The Department may rescind or amend a summary cease and desist order or quarantine order.

- If, based upon inspection, affidavits, or other evidence, the Department determines that a dispensary or the products distributed by a dispensary pose an immediate or serious threat to the public health, safety, or welfare, the Department may:
  - Issue a cease and desist order and/or quarantine order, requiring cessation or restriction of any or all dispensary operations, and prohibiting the use of medical marijuana distributed by that dispensary; or
  - Issue a cease and desist order placing restrictions on a dispensary, to the extent necessary to avert a continued threat, pending final investigation results.

- The requirements of the cease and desist order or the quarantine order shall remain in effect until the Department rescinds or amends such requirements or until such time as the department takes final action on any related pending complaint and issues a final decision.

Summary Suspension Order
The Department may summarily suspend any registration card or certificate of registration issued pursuant to state law 28 Pa. Code §1141.37, pending further proceedings for denial of renewal or revocation of a registration, whenever the Department finds that the continued registration poses an imminent danger to the public health, safety, or welfare.

Hearings
- Upon written request, a registrant shall be afforded a hearing no later than 28 calendar days after the effective date of a summary cease and desist order or quarantine order issued pursuant to state law. At the hearing, the Department must prove by a preponderance of the evidence that there existed immediately prior to, or at the time of the order, an immediate or serious threat to the public health, safety, or welfare.

- Upon written request, a registrant shall be afforded a hearing no later than 14 calendar days after the effective date of a summary suspension order issued pursuant to state law. At the hearing, the Department must prove by a preponderance of the evidence that there existed immediately prior to, or at the time of the suspension, an imminent danger to the public health, safety, or welfare.

- With the exception of the provisions for cease and desist orders and quarantine orders pursuant to state law, and summary suspension orders pursuant to state law, the Department shall...
provide written notice, and shall provide a hearing if a hearing is requested in writing within 21 calendar days after the effective date stated in the notice, prior to:

- Denying a renewal application for a registration card;
- Revoking a registration card for a registered qualifying patient, personal caregiver, or dispensary agent;
- Denying a renewal application for or revoking a hardship cultivation registration;
- Denying a renewal application of a Dispensary;
- Revoking the registration certificate of a Dispensary;
- Limiting sales of marijuana by a Dispensary; or
- Revoking a certifying physician registration.

The written notice shall provide the registrant with a statement of the grounds for the action and of the right to request a hearing and the time-period for such request.
Exhibit: Visitor Log

*This form should be completed online.

VISITOR LOG

Date: ___________________________  Visitor Name: __________________________________

Company/Organization (If applicable):

______________________________

Attach photocopy of identification document

Select File

Visit Location:

______________________________

Badge Number:

______________________________

Time In: ________________________  Time Out: __________________________

Purpose of Visit:

______________________________

Comments:

______________________________

Manager Signature

______________________________

Submit
### Facility Audit Log

*This form should be completed online.*

---

**Facility Audit**

<table>
<thead>
<tr>
<th>Date:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Auditor:</td>
<td></td>
</tr>
<tr>
<td>Type of audit:</td>
<td></td>
</tr>
<tr>
<td>Manager on duty:</td>
<td></td>
</tr>
</tbody>
</table>

**Auditor requirements:**
- (D) = Daily
- (M) = Monthly
- (S) = Semi-Annually

---

**COMPLIANCE ITEMS**

<table>
<thead>
<tr>
<th>Compliance Item</th>
<th>Yes</th>
<th>No</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is every person on-site properly identified with an identification badge or visitor’s badge? (D)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Is there any evidence of marijuana having been consumed on-site? (D)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Is any marijuana or associated product visible to a person outside the facility?</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
</tbody>
</table>

**Auditor Comments on Compliance Items**

---

**PERSONNEL AND TRAINING**

<table>
<thead>
<tr>
<th>Training Requirement</th>
<th>Yes</th>
<th>No</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is each person assigned to a job function properly trained for that duty? (D)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Does initial training include a thorough review of hazards and accidents associated with the job? (S)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Question</td>
<td>Options</td>
<td>Space for Notes</td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>---------------</td>
<td>-----------------</td>
<td></td>
</tr>
</tbody>
</table>
| Are repetitive motion tasks properly paced and kept to a minimum? (D)  | Yes | Other
| Do joint committee members have access to material safety data sheets? (M) | Yes | No | Other
| Are workers informed (by hazard signs and tags)? (D)                   | Yes | No | Other
| Have all trucks, forklifts and other equipment been inspected and maintained? (M) | Yes | No | Other
| Are lockout procedures followed? (S)                                    | Yes | No | Other
| Is ventilation equipment working effectively? (D)                       | Yes | No | Other
| Is fume and dust collection hood properly adjusted? (D)                 | Yes | No | Other
| Auditor Comments on Work Process                                        |               |

**FIRE EMERGENCY PROCEDURES**

<table>
<thead>
<tr>
<th>Question</th>
<th>Options</th>
<th>Space for Notes</th>
</tr>
</thead>
</table>
| Is there a clear fire response plan posted for each work area? (S)       | Yes | No | Other
| Do all workers know the plan? (M)                                       | Yes | No | Other
| Are drills held regularly? (S)                                           | Yes | No | Other
Department Registration Plan

Department Registration Plan Summary
The Department Registration Plan describes a comprehensive plan for addressing all registration requirements pertaining to the establishment and continued operation of a legal medical marijuana dispensary and those registration requirements pertaining to all associated persons, in accordance with state regulations.

It is established herein that the company will register with the Department, maintain proper registration, and remain in good standing with the Secretary of the Commonwealth at all times while in operation. The president of the company is assigned responsibility for maintaining the company’s registration and standing with the Department, and for the renewal of all the company’s Department registrations.

Timely registration renewal plans are detailed in full, with the General Manager assigned responsibility for enforcing registration policies and for maintaining copies of all registration cards along with a calendar of registration expiration dates for the entity and all dispensary agents.

All directors, officers, members, agents, and employees will be properly disclosed, meet all requirements of the Department, and be properly registered with the Department. No person under 18 years old or who has been convicted of a felony drug offense will be associated with the company, and additional provisions restricting access to medical marijuana based on criminal history of associated persons are detailed herein.

Additional measures are included to address the carrying of registration cards, lost or stolen registration cards, change of dispensary agent information, payment of fees, termination of association, closure plans, and executive management registration responsibilities. It is established that all agreements with executives will comply with State law and Department regulations, and that Department regulations will supersede contractual agreements.

General – Department Registration

Dispensary Registration Required
The company will register with the Department, maintain proper registration, and remain in good standing with the Secretary of the Commonwealth at all times while in operation. The president is responsible for the company’s standing with the Department.

Registration Required for all Associated Persons
All directors, officers, members, agents, and employees of the company must be properly disclosed, meet all requirements of the Department, and be properly registered with the Department. No person under 18 years old or who has been convicted of a felony drug offense will be associated with the company, and additional provisions restricting access to medical marijuana based on criminal history of associated persons are detailed herein.

Additional measures are included to address the carrying of registration cards, lost or stolen registration cards, change of dispensary agent information, payment of fees, termination of association, closure plans, and executive management registration responsibilities. It is established that all agreements with executives will comply with State law and Department regulations, and that Department regulations will supersede contractual agreements.

28 Pa Code § 1141.XX.
under 18 years old or who has been convicted of a felony drug offense may be associated with the company.

**Voided Registration**
A registration card issued to a company dispensary agent is void when the agent ceases to be associated with the company.

28 Pa Code § 1141.XX.

**Association Waiting Period**
No director, officer, member, incorporator, employee, or other dispensary agent of the company may become associated in any way with the company until they undergo a criminal background check. The General Manager ensures the criminal background check includes a Department of Criminal Justice Information (CORI) request submitted to the Department. The applicant shall be responsible for paying the applicable fees for registration.

28 Pa Code § 1141.XX.

**Dispensary Agents Must Carry Registration Cards**
A dispensary agent must carry their Department registration card at all times while at the Dispensary or while transporting medical marijuana for the company.

28 Pa Code § 1141.XX.

**Restricted Access Based on Criminal History**
No director, officer, member, incorporator, agent, or employee of the company who has had a misdemeanor conviction for a drug-related offense shall have access to medical marijuana at the Dispensary.

**Lost or Stolen Registration Cards and Change of Dispensary Agent Information**
The company dispensary agents are required to notify the company immediately should their registration card be lost or stolen, or if any change occurs to the information provided to the Department for registration. The General Manager must notify the Department of such loss, theft, or change within five business days.

28 Pa Code § 1141.XX.

**Timely payment of fees**
The president is required to ensure the company remits all registration and renewal fees on time so as not to incur any administrative or criminal penalties.

**General Manager Responsibilities**
1. The General Manager maintains copies of all registration cards, a calendar of registration expiration dates for the entity and all dispensary agents and enforces registration policies as necessary.
2. The General Manager is responsible for the timely annual renewal of the Dispensary registration and the timely renewal for each dispensary agent registration. The General Manager will take necessary and appropriate action when an associated individual does not properly renew their registration.

Denial and Revocation of Registration

Denial of a Registration Card
Each of the following, in and of itself, constitutes full and adequate grounds for denial of a registration card for a registered qualifying patient, personal caregiver, or dispensary agent:

1. Failure to provide the information required by state law in 105 CMR 725.000 for a registration card;
2. Provision of misleading, incorrect, false, or fraudulent information on the application;
3. Failure to meet the requirements set forth in state law 105 CMR 725.000 for a registration card;
4. Revocation or suspension of a registration card or registration in the previous six months;
5. Failure to pay all applicable fees; or
6. Any other ground that serves the purposes of state law. 105 CMR 725.000 or the Act.

Revocation of a Registration Card
Each of the following, in and of itself, constitutes full and adequate grounds for revocation of a registration card issued to a registered qualifying patient, personal caregiver, or dispensary agent:

1. Submission of misleading, incorrect, false, or fraudulent information in the application or renewal application;
2. Violation of the requirements of state law; the Act or 105 CMR 725.000;
3. Fraudulent use of a registration card;
4. Selling, distributing, or giving medical marijuana to any unauthorized person;
5. Tampering, falsifying, altering, modifying, duplicating, or allowing another person to use, tamper, falsify, alter, modify, or duplicate a registration card;
6. Failure to notify the Department within five business days after becoming aware that the registration card has been lost, stolen, or destroyed; or
7. Failure to notify the Department within five business days after a change in the registration information contained in the application or required by the Department to have been submitted in connection therewith.

Felony Offenses Prohibited
A conviction of a felony drug offense in the Commonwealth, or a like violation of the laws of another state, the United States or a military, territorial, or Indian tribal authority is adequate grounds for the revocation of a dispensary agent’s registration card and immediate termination by the company.
28 Pa Code § 1141.XX.

Other Grounds for Revocation
The Department may also revoke a registration card for any other ground that serves the purposes of state law 105 CMR 725.000 or the Act. The company will terminate the association of any dispensary agent whose registration is revoked by the Department.

28 Pa Code § 1141.XX.

Effect of a Dispensary Denial of Renewal or Revocation
1. A Dispensary that has had its application for renewal registration denied or its registration revoked is disqualified from future registration as a Dispensary.
2. A dispensary agent whose registration card has been revoked is disqualified from serving as a dispensary agent or from having any financial interest in a Dispensary.
3. The surrender of a certificate of registration or a registration card shall not prevent the Department from revoking, or imposing other penalties with respect to, such certificate of registration or registration card.

28 Pa Code § 1141.XX

Executive Management Registration

Contractual Agreements
All agreements with executives must comply with State law, ordinance, and Department regulations. Department regulations must supersede contractual agreements.

Documents Required
The appointment of any executive must comply with the company’s by-laws, be properly approved, and documented in the company record by the President.

Registration Requirements
All prospective executives must be properly screened and monitored throughout the registration process by the President to ensure:

1. The applicant is at least eighteen (18) years of age;
2. The applicant is not currently registered with more than two other Dispensaries (employees only);
3. The applicant does not have financial or any other interest in any laboratory providing testing services for any Dispensary;
4. A criminal offender record report (issued within 30 days) is submitted to the Department; and
5. The applicant has not been convicted of any felony before filing the application.
Executive Management Responsibilities

Each executive of the company is responsible for the good standing of the company’s registration(s) with the Department. Executive management is required to ensure none of the following grounds for registration revocation occurs in any the company Dispensary facility:

1. The Dispensary is not operational within the time indicated. Pursuant to 105 CMR 725.100(D).
2. Information provided by the Dispensary was materially inaccurate, incomplete, or fraudulent.
3. The Dispensary has failed to comply with any requirement of the Act or 105 CMR 725.000 or any applicable law or regulation, including laws and regulations of the Commonwealth relating to taxes, child support, workers compensation, and professional and commercial insurance coverage.
4. The Dispensary has failed to submit a Plan of Correction as required or to implement a Plan of Correction as submitted pursuant to 105 CMR 725.310.
5. The Dispensary has assigned or attempted to assign its certificate of registration to another entity.
6. There has been a lack of responsible operation of the Dispensary facility, as shown by, but not limited to, one or more of the following:
   a. Incompetent or negligent operation;
   b. Failure to maintain the Dispensary in a clean, orderly, and sanitary fashion; or
   c. Permitting a person to use a registration card belonging to a different person.
7. The Dispensary does not have sufficient financial resources to meet the requirements of state law 105 CMR 725.000 or the Act.
8. The financial management of the company results in the filing of a petition for bankruptcy or receivership related to the financial solvency of the Dispensary.
9. An executive of the company or a member of the non-profit corporation has maintained a substandard level of compliance with the statutory and regulatory requirements for the operation of a health care facility or facility for providing marijuana for medical purposes in another jurisdiction (including, but not limited to, failure to correct deficiencies, a limitation upon or a suspension, revocation, or refusal to grant or renew a registration or license to operate, or certification for Medicaid or Medicare).
10. A dispensary agent of the company has a history of criminal conduct as evidenced by any criminal proceedings against such individual or against health care facilities or marijuana facilities in which such individual either owned shares of stock or served as a corporate officer, and which resulted in conviction, guilty plea, plea of nolo contendere, or admission to sufficient facts.
11. An executive of the company or a member of the non-profit corporation, has committed, permitted, aided, or abetted any illegal practices in the operation of any Dispensary.
12. The company fails to cooperate or give information to a law enforcement official acting within his or her lawful jurisdiction related to any matter arising out of conduct at any Dispensary.
13. The conduct or practices of the company have been detrimental to the safety, health, or welfare of registered qualified patients, personal caregivers, or the public.
14. The conduct and/or practices of the company demonstrate a lack of responsibility or suitability as specified in state law. 105 CMR 725.100(B)(3)(u).

15. Any other ground that serves the purposes of state law 105 CMR 725.000 or the Act as determined by the Department.

28 Pa Code § 1141.XX

Termination of Association

General – Termination of Association
Any person who is unable to qualify for registration or who is no longer able to qualify for registration due to a violation of Commonwealth law or regulation will have their relationship with the company terminated immediately. The General Manager must inform the Department within one business day of the date a dispensary agent ceases to work at, manage, or otherwise be associated with the operation.

28 Pa Code § 1141.XX

Violation of Law and Policy Prohibited
No company dispensary agent may engage in or permit conduct at any the company Dispensary facilities which is in violation of company policy, law, ordinance, or Department regulation, including but not limited to:

1. Making a false statement on an application, or in any accompanying statement that the Department may require;
2. Knowingly making a false statement on an internal or submitted report;
3. Consuming or allowing use of medical marijuana at the dispensary;
4. Causing or permitting a the company Dispensary facility to be operated in an unsafe manner, which will be reported to the Department by the general manager;
5. Unlawful sale or diversion of medical marijuana, which will be reported to law enforcement officials and the Department by the general manager;
6. Associating with a certifying physician;
7. Providing direct financial compensation to an employee of any laboratory providing testing services for any Dispensary; or
8. For the company, director, officer, or member holding more than three registrations for a Dispensary.

28 Pa Code § 1141.XX

Cause for Immediate Termination
The company will terminate employment or other association immediately with any dispensary agent who:

1. Has been convicted in a court of law of one or more violations of state law, the Act or the regulations issued by the Department (105 CMR 725.000);
2. Except for the permitted sale of medical marijuana, has knowingly engaged, permitted, or condoned inside or outside of the establishment the illegal sale, or negotiations for sale, or the use, of any controlled substance identified in the Controlled Substances Act;
3. Has been convicted of a felony, or any drug-related offense;
4. Engages or assists in the diversion of medical marijuana, which must be reported to law enforcement officials and the Department by the General Manager; or
5. Has permitted any company Dispensary facility to operate in an unsafe manner, which must be reported to the Department by the General Manager.

28 Pa Code § 1141.XX

Other Reasons for Termination
Any failure to comply with any provision of company policies and procedures, law, ordinance, or regulations that does not result in revocation of Department registration may still result in immediate termination or disassociation with the company. The President shall review any major infraction and determine the best course of action. The General Manager and President have the authority to suspend access to company facilities by any individual in question while the president makes a timely decision. Should the infraction involve one or more members of the non-profit corporation, they may not be permitted to vote until the board approves a resolution.

Temporary and Permanent Closure Plans

Adherence to law and regulation
The President shall ensure the company follows all Commonwealth and local laws and regulations pertaining to the temporary or permanent cessation of operations.

Inventory Handling
1. In the event the Dispensary has its registration renewal denied, or revoked, or is going out of business, the President is responsible for obtaining approval from the Department by submitting a written request to sell and transport medical marijuana to another Dispensary.
2. Approval by the Department is required prior to any medical marijuana being transported to another Dispensary.
3. The General Manager must begin a required transfer of medical marijuana, as authorized by the Department and the President, as soon as possible. The General Manager shall maintain detailed records of any transfer in the inventory control system.

Closure Records
The president shall maintain all records resulting from a closure, mandated or otherwise, as long as legally necessary. The General Manager must retain the services of an experienced attorney to offer opinions on the closure procedures and document control issues in accordance with the Recordkeeping, Reporting, and Notifications Plan.
**Registration Expiration, Revocation, or Voiding**

If the company’s registration to operate expires without being renewed, is revoked, or becomes void, the General Manager must:

- Immediately discontinue dispensing of medical marijuana;
- Weigh and inventory all unused medical marijuana products, and create and maintain a written record of all such items;
- Dispose of the unused medical marijuana in accordance with the Inventory Management and Waste Disposal Plan and 105 CMR 725.105(J) subsequent to approval by the Department. (Such disposal shall be considered to be in the best interests of the general public, and the Department shall not be held liable in any way for any financial or other loss); and
- Maintain all records as required by the Recordkeeping, Reporting, and Notifications Plan and 105 CMR 725.105(I)(7).

**Department Authority**

If the company does not comply with the requirements above, the Department shall have the authority to, at the company’s expense, secure the Dispensary, and after a period of thirty calendar days, seize and destroy the inventory and equipment and contract for the storage of Dispensary records.

**Security During Closure**

The General Manager shall ensure during closing activities and for the duration of a temporary closure, all applicable security policies and measures remain in place in accordance with the Security Plan.

**Disposal of Product During Closure**

The General Manager must properly document all medical marijuana disposed of in any manner resulting from a closure on the Waste Disposal Log and on all forms required by the Department and local police department if necessary.

**Renewal and Revocation of Dispensary Registration**

**Dispensary Renewal Requirements**

At least sixty days prior to the Dispensary’s registration expiration date, the President must submit a completed renewal application and renewal fee to the Department. All information submitted in the original Dispensary application must be updated and checked for accuracy.

**President Responsible for Maintaining and Renewing Department Registration(s)**

The President is responsible for the timely renewal of all the company Department registrations. The President must also ensure that no activities during the registration period constitute full or adequate
grounds by the Department for denying a renewal application or revoking registration. The following are considered full and adequate grounds for application denial and registration revocation:

1. The Dispensary is not operational within the time indicated pursuant to state law. 105 CMR 725.100(D).
2. Information provided by the company was materially inaccurate, incomplete, or fraudulent.
3. The company has failed to comply with any requirement of the Act or 105 CMR 725.000 or any applicable law or regulation, including laws and regulations of the Commonwealth relating to taxes, child support, workers compensation, and professional and commercial insurance coverage.
4. The company failed to submit a Plan of Correction as required or to implement a Plan of Correction as submitted pursuant to state law 105 CMR 725.310.
5. The company assigned or attempted to assign its certificate of registration to another entity.
6. There has been a lack of responsible operation of any company Dispensary facility, as shown by, but not limited to, one or more of the following:
   a. Incompetent or negligent operation;
   b. Failure to maintain the Dispensary in a clean, orderly, and sanitary fashion; or
   c. Permitting a person to use a registration card belonging to a different person.
7. The company does not have sufficient financial resources to meet the requirements of state law. the Act or 105 CMR 725.000.
8. The financial management of the company results in the filing of a petition for bankruptcy or receivership related to the financial solvency of the company.
9. An executive of the company or a member of the non-profit corporation has maintained a substandard level of compliance with the statutory and regulatory requirements for the operation of a health care facility or facility for providing marijuana for medical purposes in another jurisdiction, including, but not limited to, failure to correct deficiencies, a limitation upon or a suspension, revocation, or refusal to grant or renew a registration or license to operate, or certification for Medicaid or Medicare.
10. A dispensary agent of the company has a history of criminal conduct as evidenced by any criminal proceedings against such individual or against health care facilities or medical marijuana operations in which such individual either owned shares of stock or served as a corporate officer, and which resulted in conviction, guilty plea, plea of nolo contendere, or admission to sufficient facts.
11. An executive of the company or a member of the non-profit corporation has committed, permitted, aided, or abetted any illegal practices in the operation of any Dispensary.
12. The company failed to cooperate or give information to a law enforcement official acting within his or her lawful jurisdiction related to any matter arising out of conduct at any Dispensary.
13. The conduct or practices of the company have been detrimental to the safety, health, or welfare of registered qualified patients, personal caregivers, or the public.
14. The conduct and/or practices of the company demonstrate a lack of responsibility or suitability as specified in state law. 105 CMR 725.100(B)(3)(u).
15. Any other ground determined by the Department that serves the purposes of 105 CMR 725.000 or the Act.

28 Pa Code § 1141.XX

Exhibit: Waste Disposal Log

*This form should be completed online.
Emergency and Incident Response Plan

Incident Response Plan Summary
The Incident Response Plan establishes procedures for addressing any incident including natural disaster, unauthorized access, theft, or disclosure of confidential information, in accordance with applicable legal and regulatory requirements and company policy.

Provisions for general emergency and incident management, general incident containment and corrective measures are thoroughly detailed. Primary and alternate contact lists are contained herein, in addition to a and . The General Manager is assigned responsibility for confirming the occurrence of an incident requiring the execution of this plan, and for ensuring the response protocol is followed.

The registered medical marijuana dispensary will immediately notify appropriate law enforcement authorities and the Department within 24 hours after the discovery of a reportable incident as defined by Department regulations. Measures for incident reporting in accordance with state law and regulations are comprehensively detailed. All incident activities will be documented. All documentation related to an incident will be maintained for no less than one year and made available, upon request, to the Department and to law enforcement authorities acting within their lawful jurisdiction.

The primary emphasis of activities described within this plan is the return to a normalized (secure) state as quickly as possible, while minimizing the adverse impact to the company. Product recall procedures are addressed in the company's Product Recall Plan.

Examples of Incidents
Examples of an incident may include but are not limited to:

- Theft or physical loss of medical marijuana products or confidential records;
- Robbery or unauthorized entry to the facility;
- Threats of violence to the facility, personnel, or visitors; or
- Other incidents including:
  - Bomb threats
  - Fires
  - Earthquakes
  - Hazardous Materials Release
  - Floods
  - Windstorms
  - Civil Disturbances
  - Pandemic Flu
  - Serious Accidents
  - Criminal Activity
General – Emergency and Incident Management

Incident Training Required
All employees must be required to receive incident training upon hiring and annually in accordance with the company’s Training Plan.

General Manager Responsible for Incident Training
The General Manager is responsible to ensure the adequate training of employees utilizing third-party trainers as necessary.

Employee Responsibilities
1. Each employee is expected to know the location of alarms, utility cabinets, fire extinguishers, emergency exits, and first aid supplies.
2. If trained and safe to do so, the ability to extinguish a fire using a portable fire extinguisher.
3. Preplan an evacuation route based on your familiarity with the building and patient and caregiver safety. Always take the nearest stairwell.
4. Do not re-enter the building or allow others to re-enter.
5. Regular review of facility floor plans and evacuation plan maps is recommended.

General Manager Responsibilities

During an Incident
To ensure an appropriate and timely execution of this protocol, the General Manager is required to:

1. Confirm the occurrence of an incident requiring the execution of this protocol.
   a. Secure all product following any instance of diversion, theft, or loss of marijuana, and conduct an assessment to determine whether additional safeguards are necessary.
2. Collect any evidence supportive of the event (unless law enforcement is required on scene).
3. Supervise and direct the consistent, timely, and appropriate response to an incident.
4. Provide appropriate communication to parties having a vested interest in the incident.
5. Offer support to employees, patients, or other interested parties as appropriate until the incident is resolved.
   a. Conduct a post-incident review and make any necessary adjustments to security measures and procedures.

Policy and Procedures Maintenance
Maintain the procedures contained in this document, document any changes, and re-train as soon as possible if necessary.

Response Protocols
The General Manager must ensure the response protocol is followed. The response protocol includes the following procedures:
Assessment
The General Manager will determine the category and severity of the incident and undertake discussions and activities to best determine the next best course of action. All discussions, decisions and activities are to be documented.

Evacuation
1. Any manager may determine the need to evacuate a premises. Reasons for evacuation may include:
   a. Fire;
   b. Bomb threat;
   c. A hostile or violent employee, patient, visitor, or unknown person;
   d. Power outage;
   e. Earthquake;
   f. Water or gas leak;
   g. Hazardous chemical spill; and
   h. Robbery or hostage situation.
2. All employees must ensure that patients and visitors do not:
   a. Use elevators;
   b. Gather in lobbies;
   c. Bring disabled individuals into stairwells without fire department approval;
   d. Open a door without first checking for heat;
   e. Run or panic; and
   f. Re-enter the building until authorized.
3. Disabled individuals or others who need assistance should:
   a. Be assisted by an employee; and
   b. Be evacuated only under the direction of authorized emergency personnel or when there is an immediately threat to personal safety and security (i.e. Fire Department).
4. If applicable, preserve any and all evidence, if applicable, and remain accessible for discussion with law enforcement personnel. Request witnesses to stay or provide their contact information.
5. Do not touch any suspicious items or suspected bombs.

Fire Incidents
- If the fire does not present an immediate danger to personal safety, one employee shall try to extinguish the fire.
- Otherwise, call 911 immediately and evacuate the building at once.

Notification and Communication
The General Manager will take action to notify the appropriate internal and external parties, as necessary.

- Internal notification – the General Manager will notify the President of an incident as soon as possible. The General Manager will notify personnel as necessary.
• External notification – unless responders must be notified in an emergency, all external notifications and communications must be approved by the President. External parties may include regulators, suppliers, patients, media or other affected parties.

**Containment**
The General Manager (with the President if available) will determine and cause to be executed the appropriate activities and processes required to quickly contain and minimize the immediate impact to personal safety, the company, patients, and other affected parties. Containment activities are designed to:

1. Minimize harm to individuals.
2. Counteract the immediate threat.
3. Prevent propagation or expansion of the incident.
4. Minimize actual and potential damage.
5. Restrict knowledge of the incident to authorized personnel.
6. Preserve information relevant to the incident.

**Corrective Measures**
The President and General Manager will determine and cause to be executed the appropriate activities and processes to quickly restore circumstances to a normalized (secure) state. Corrective measures are designed to:

1. Secure the environment.
2. Restore the environment to its normalized state.

**Incident Closure**
The General Manager will stay actively engaged throughout the life of the incident to assess the progress/status of all containment and corrective measures and determine at what point the incident can be considered resolved. Recommendations for improvements to processes, policies, procedures, etc. will exist beyond the activities required for incident resolution and should not delay closing the incident, but will be implemented by the president.

**Facility Closures**
The general manager must manage any required facility closures ensuring that:

1. Essential services are maintain to the extent possible even during an emergency.
2. Minimum staffing levels are maintained.
3. Required stakeholder communications are issued.
4. An action plan for provision of essential services restoration of full services is implemented immediately.
5. Provide a common area (lounge area) with food and bedding for employees asked to perform extended duty. Consider ways to support voluntary sequestration.
6. Offsite employees may support administrative tasks, (time entry, scheduling, etc.).
7. Suspend large group meetings and non-essential meetings and limit or suspend travel.
8. Encourage telecommuting for applicable job functions.
9. Provide sufficient and accessible infection control supplies (e.g. hand-hygiene products, tissues and receptacles for their disposal) in all facility areas. Increase surface cleaning in common areas as necessary.
10. Re-prioritize and suspend work when resources dwindle. Implement contingency plans for major projects or safely shut down major projects that cannot be supported.
11. Implement operational contingency plans if essential operations are threatened. Emergency assignments may be made to non-typical job classifications

**Incident Reporting**

**Reporting Required**

1. Incident reporting must be documented by the general manager in accordance with the company’s Recordkeeping, Reporting, and Notifications Plan.
2. Anyone with knowledge or a reasonable suspicion of an incident is instructed to make an immediate report to the general manager and record the incident in the . All incident activities, from receipt of the initial report through post-incident review, are to be documented. The General Manager is responsible for ensuring all events are recorded, assembling these records in preparation and performance of the post-incident review, and ensuring all records are preserved for review. Recording must include:
   a. A summary of the incident providing a general description of events, approximate timelines, parties involved, resolution of the incident, external notifications required, and recommendations for prevention and remediation.
   b. A description of incident events, indicating specific timelines, personnel involved, hours spent on various activities, impact to affected parties, employees, ensuing discussions, decisions and assignments made, problems encountered, successful and unsuccessful activities, notifications required or recommended, steps taken for containment and remediation, recommendations for prevention and remediation (short-term and long-term), identification of policy and procedure gaps, results of post-incident review.
3. All relevant documentation will be retained by the general manager for archival in a cloud storage repository. Access to the documentation and repository is typically restricted to management and executives.

**Post-incident Review Required**

A review of incident-related activities is a required element of this plan. All affected parties are recommended participants.

- The General Manager will host a Post-incident Review after each incident has been resolved; this discussion should be scheduled within 2-3 weeks of the incident’s remediation. The review is an examination of the incident and all related activities and events. All activities performed relevant to the incident should be reviewed with an eye towards improving the overall incident response process.
• Recommendations on changes to policy, process, safeguards, etc. are both an input to and by-product of this review. All discussion, recommendations and assignments are to be documented for distribution to the president and follow-up by the General Manager.

Department and Law Enforcement Reporting Required
The General Manager shall immediately notify appropriate law enforcement authorities and the Department within twenty-four hours after discovering the following:

1. Discrepancies identified during inventory, diversion, theft, loss, and any criminal action involving the company or a dispensary agent;
2. Any suspicious act involving the sale, cultivation, distribution, processing, or production of marijuana by any person;
3. Unauthorized destruction of marijuana;
4. Any loss or unauthorized alteration of records related to marijuana, registered qualifying patients, personal caregivers, or dispensary agents;
5. An alarm activation or other event that requires response by public safety personnel;
6. The failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last longer than eight hours; and
7. Any other breach of security.
8. The General Manager, within 10 calendar days, must provide written notice to the Department of any incident described above, by submitting an incident report in the form and manner determined by the Department which details the circumstances of the event, any corrective actions taken, and confirmation that the appropriate law enforcement authorities were notified.
9. All documentation related to an incident that is reportable must be maintained for no less than one year and made available to the Department and to law enforcement authorities acting within their lawful jurisdiction upon request.

28 Pa. Code § 1141.XX

Follow-up
The general manager will follow-up with the all affected parties, as required and appropriate.

Primary and Alternate Contact List

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<thead>
<tr>
<th>Contact</th>
<th>Primary</th>
<th>Alternate</th>
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<tr>
<td>Company president</td>
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<td>Attorney</td>
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<td>Department contact</td>
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</tbody>
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Notification Tree

Recall and Withdrawal Management Team:
A team responsible for traceability is required for any withdrawal or recall event. The team is responsible for coordinating all aspects of a withdrawal or product recall event.

Team Members

President / Administration

- Obtain legal counsel and expert advice.
- Submit Department notifications and communication.
- Decide procedure implementation and class assignment.
- Coordinate media communications.
- Direct facility management efforts and communications.

Facility Management

- Await instructions from the president or administration team.
- Contact suppliers and vendors.
- Conduct internal complaint investigation.
- Direct assistant manager and agent efforts and communications.

Facility Assistant Managers and Agents

- Await instructions from facility management.
- Contact patients, caregivers, vendors, and suppliers.
- Communicate disposal, return, or pick-up instructions.
- Assist with the removal or disposal of withdrawn or recalled products.

Incident Assessment Checklist

The activities described in this checklist are designed to assist in the initial assessment process performed and/or conducted by the general manager. Completion of this checklist is essential for any incident that calls for the execution of the Incident Response Protocol. Once a review team is assembled, the checklist is reviewed for completion to ensure all pertinent facts are established.
Incident Containment Activities

General – Incident Containment
The General Manager will determine and execute the appropriate activities and processes required to quickly contain and minimize the immediate impact to the company, our patients, and other stakeholders. Containment activities are designed with the primary objectives of:

1. Counteracting the immediate threat.
2. Preventing propagation or expansion of the incident.
3. Minimizing the actual and potential damage.
4. Restricting knowledge of the incident to authorized personnel.
5. Preserving information relevant to the incident.
Corrective Measures
Employee Manual

Employee Manual Summary
The Employee Manual details specific personnel policies and standards of conduct for employees of the company. This manual applies to all employees, which are defined as persons who regularly work for the company on a contract, wage, or salary basis. The policies contained herein must be followed as a condition of continued employment. Detailed information about employment applications, drug testing, and criminal background checks is included. Employment policies include required Department registration and execution of the Confidentiality Agreement, along with benefits and working conditions consistent with the Fair Labor Standards Act.

Additional standard practice policies include those for non-discrimination, harassment, safety, hygiene, security, orientation, and training. Procedures for sequences of corrective actions and termination are detailed. The employee manual does not serve as a contract of employment between the company and any one or all of its employees and may be changed at any time.

General – Employee Manual

Introduction
This employee manual is designed to acquaint you with the company and provide you with information about working conditions, benefits, and policies affecting your employment.

The information contained in this manual applies to all employees of the company. Following the policies described in this manual is considered a condition of continued employment. However, nothing in this manual alters an employee’s status. The contents of this manual must not constitute nor be construed as a promise of employment or as a contract between the company and any of its employees. The manual is a summary of our policies, which are presented here only as a matter of information.

You are responsible for reading, understanding, and complying with the provisions of this manual. Given the highly unusual nature of your employment including the legal and political environment surrounding the operation, it is imperative you understanding your roles and responsibilities as an agent of the company. Our objective is to provide you with a work environment that is constructive to both personal and professional growth and the legitimacy of medical marijuana as a viable alternative medicine.

NOTHING CONTAINED IN THIS EMPLOYEE MANUAL IS INTENDED TO CREATE, NOR SHALL BE CONSTRUED AS CREATING A CONTRACT OF EMPLOYMENT, EXPRESS OR IMPLIED, OR GUARANTEE EMPLOYMENT FOR ANY TERM OR FOR ANY SPECIFIC PROCEDURES. THERE IS NO CONTRACT OF EMPLOYMENT BETWEEN THE COMPANY AND ANY ONE OR ALL OF ITS EMPLOYEES. EMPLOYMENT SECURITY CANNOT BE GUARANTEED FOR OR BY ANY EMPLOYEE.

Management Philosophy
The company pledges to its employees that as long as the affairs of this company are in our hands, the following principles will govern our actions with employees.
The company employees and their welfare are very important to the success of our company. Our long-range objective is the continuous development of a growing and prospering business through which both the employees and the company will benefit. Every employee is considered a member of our company team. Our success as a company is built on the recognition of the skills and efforts made by each employee. It is our policy to work with all members of our team in a fair and friendly manner and to treat each team member with dignity and respect.

The management of the company will work continually for the benefit of our present and prospective clients as well as our employees to improve the competitive position of our company. This will enable us to provide excellent jobs for our team members.

General conditions such as safety, cleanliness, and employee accommodations will be evaluated periodically for possible improvement and will always compare favorably with good industry practice. We will be pleased to meet with any employee to discuss suggested improvements in working conditions.

We will devote our best effort to conducting an expanding business within which will prevail an atmosphere of harmony with opportunity for all employees of the company.

Changes in Policy
This manual supersedes all previous employee manuals and memos that may have been issued from time to time on subjects covered in this manual.

However, since our business and our organization as well as laws and rules applicable to our operation are subject to change, we reserve the right to interpret, change, suspend, cancel, or dispute with or without notice all or any part of our policies, procedures, and benefits at any time. We will notify all employees of these changes. Changes will be effective on the dates determined by the company, and after those dates all superseded policies will be null.

No individual supervisor or General Manager has the authority to change policies at any time. If you are uncertain about any policy or procedure, speak with your direct supervisor.

Employment Applications and Registration

Accuracy is Required
We rely upon the accuracy of information contained in the Employment Application and the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment.

Physical Examination
For certain positions or under certain circumstances and after an offer of employment, a physical examination may be required. When a physical examination is requested, the physical examination will
be conducted by a company-appointed physician at the company's expense. Employment and assignment will be conditional pending the receipt of a satisfactory physician's report.

**Drug Testing**

All prospective employees will be required to take a drug test. Any candidate who fails the drug screen will not be accepted for employment and may be ineligible for employment consideration for a period of twelve (12) months.

**Motor Vehicle Record (MVR) Inquiry**

Prospective employees expected to drive company vehicles must provide the company with current and acceptable motor vehicle driving information. Employment and assignment will be conditional pending the receipt of a satisfactory report from the Division of Motor Vehicles.

**Criminal Background Check**

Generally, under the provisions of the CORI law and regulations, an organization that is inclined to make an adverse decision on the basis of a CORI is required to provide the subject with the opportunity to dispute the accuracy of the CORI. The organization is also required to provide the following information: (a) a copy of the CORI; (b) information regarding which part of the CORI makes the person ineligible for the position; (c) a copy of the organization’s CORI policy; and (d) DCJIS’s information regarding the process for correcting a CORI.

**Employment Relationship**

Depending on the job description of the employee, he or she may be required to register with the Department of Public Health in accordance with state law. If the employee is ineligible for registration for any reason, the company is free to terminate the employment relationship immediately. You enter into employment voluntarily, and you are free to resign at any time for any reason or no reason. Similarly, the company is free to conclude its relationship with any employee at any time for any reason or no reason. Following the probationary period, employees are required to follow the Employment Termination Policy section to terminate their relationship with the company.

**Employment of Relatives**

The company discourages the employment of close relatives because it is not considered sound business practice. However, under certain conditions, management may waive this policy in favor of employing close relatives within the organization. Close relatives are defined as: spouse, mother, father, son, daughter, brother, sister, grandparent and in-laws.

**Definitions of Employment**

**Employee**

An “employee” of the company is a person who regularly works for the company on a wage or salary basis. “Employees” may include exempt, non-exempt, regular full-time, regular part-time, and temporary persons, and others employed with the company who are subject to the control and direction of the company in the performance of their duties. Independent contractors may be subject to
the terms and policies of this manual, but must not be eligible for any rights or benefits granted to employees of the company.

**Exempt**
Employees whose positions meet specific criteria established by the [Fair Labor Standards Act (FLSA)](https://www.dol.gov/esa/flsa) and who are exempt from overtime pay requirements.

**Non-exempt**
Employees whose positions do not meet FLSA criteria and who are paid one and one-half their regular rate of pay for hours worked in excess of 40 hours per week.

**Regular Full-time**
Employees who have completed the probationary period and who are regularly scheduled to work 32 or more hours per week. Generally, they are eligible for the company’s benefit package, subject to the terms, conditions, and limitations of each benefit program.

**Regular Part-time**
Employees who have completed the probationary period and who are regularly scheduled to work less than 32 hours per week. As a general matter, work schedules are a matter of agreement between an employer and employee.

**Temporary (Full-time or Part-time)**
Those whose performance is being evaluated to determine whether further employment in a specific position or with the company is appropriate or individuals who are hired as interim replacements to assist in the completion of a specific project or for vacation relief. Employment beyond any initially stated period does not in any way imply a change in employment status. Temporary employees retain that status until they are notified of a change. They are not eligible for any of the company’s benefit programs.

**Employment Policies**

**Non-discrimination**
In order to provide equal employment and advancement opportunities to all individuals, employment decisions at the company will be based on merit, qualifications, and abilities. The company does not discriminate in employment opportunities or practices because of race, color, religion, sex, national origin, age or disability.

The company will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Employees with questions or concerns about discrimination in the workplace are encouraged to bring these issues to the attention of their supervisor. Employees can raise concerns and make reports
without fear of reprisal. Anyone found to be engaging in unlawful discrimination will be subject to disciplinary action, including termination of employment.

**Non-disclosure/confidentiality**

The protection of confidential business information, patient information, and trade secrets is vital to the interests and success of the company. Such confidential information includes, but is not limited to, the following examples:

1. Compensation data,
2. Financial information,
3. Marketing strategies,
4. Pending projects and proposals,
5. Proprietary production processes,
6. Personnel/payroll records, and
7. Patient information.

All employees are required to execute a Confidentiality Agreement as a condition of employment. Employees who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

Employees are not to disclose information to any media outlet as a representative of the company. All media inquiries are to be directed to an employee’s immediate supervisor or the company’s designated media contact via detailed message from recipient.

**New Employee Orientation and Training**

Orientation is a formal welcoming process that is designed to make the new employee feel comfortable, informed about the company, and prepared for their position. New employee orientation is conducted by a management representative, and includes an overview of the company history, an explanation of the company core values, vision, and mission; and company goals and objectives. In addition, the new employee will be given an overview of benefits, tax, and legal issues, and complete any necessary paperwork.

Employees are presented with all codes, keys, and procedures needed to navigate within the workplace. The new employee’s supervisor then introduces the new hire to staff throughout the company, reviews the job description, explains the company’s evaluation procedures, and helps the new employee get started on specific functions.

Dispensaries must ensure that all dispensary agents complete training prior to performing job functions. Training must be tailored to the roles and responsibilities of the job function of each dispensary agent, and at a minimum must include training on confidentiality, and other topics as specified by the Department. At a minimum, staff must receive 8 hours of on-going training annually. Training must cover at a minimum:
1. Local, state and federal marijuana laws;
2. Medical marijuana efficacy and recent research;
3. Patient confidentiality, education, and care;
4. Personnel, product, and premise security; and
5. Record keeping and regulatory responsibilities.

**Probationary Period for New Employees**

The probationary period for regular full-time and regular part-time employees lasts up to 180 days from date of hire. During this time, employees have the opportunity to evaluate our company as a place to work and management has its first opportunity to evaluate the employee. During this introductory period, both the employee and the company have the right to terminate employment without advance notice.

Upon satisfactory completion of the probationary period, a 180 day review will be given and benefits will begin as appropriate. All employees, regardless of classification or length of service, are expected to meet and maintain company standards for job performance and behavior as outline in our Standards of Conduct section.

**Work Hours**

The company work hours vary depending on location of work. Your supervisor will inform you of the hours at your scheduled location.

The standard workweek is 40 hours of work. is applicable in some situations. In the computation of various employee benefits, the employee workweek is considered to begin on Monday (starting at 12:01 a.m.) through Sunday (ending at 12:00 a.m.), unless a supervisor makes prior other arrangement with the employee.

**Meal Periods**

Employees are allowed an unpaid, half hour meal break after five consecutive hours of work. Lunch breaks generally are taken on a staggered schedule so that your absence does not create a problem for co-workers or patients. Your supervisor will aid in staggering schedules to ensure proper coverage for the work location.

**Break Periods**

Employees are allowed a paid 10 minute break after each four hours of consecutive work. Please notify your supervisor when your break time is due to ensure proper coverage for your position. If employees have unexpected personal business to take care of, they must notify their direct supervisor to discuss time away from work and make provisions as necessary. Personal business should be conducted on the employee’s own time. Employees who do not adhere to the break policy will be subject to disciplinary action, including termination.
**Personnel Files**

Employee personnel files include the following: job application, job description, résumé, records of participation in training events, salary history, records of disciplinary action and documents related to employee performance reviews, coaching, and mentoring.

Personnel files are the property of the company, and access to the information is restricted. Management personnel of the company who have a legitimate reason to review the file are allowed to do so.

Employees who wish to review their own file should contact their supervisor. With reasonable advance notice, the employee may review his/her personnel file in company’s office and in the presence of their supervisor or other management personnel.

**Employee Information Changes**

It is the responsibility of each employee to promptly notify their supervisor of any changes in personnel data required by the Pennsylvania Department of Health at the time of agent registration, such as:

1. Full name,
2. Mailing address,
3. Telephone numbers,
4. Name and number of dependents, and
5. Individuals to be contacted in the event of an emergency.
6. Written acknowledgement by the individual of the limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana for medical purposes in the Commonwealth.

Any changes in personnel data must be reported to the Pennsylvania Department of Health by the agent's Dispensary within five business days after any changes to the information that the Dispensary was previously required to submit to the Department, or after discovery that a registration card has been lost or stolen. An employee’s personnel data should be accurate and current at all times.

**Inclement Weather/Emergency Closures**

At times, emergencies such as severe weather, fires, or power failures can disrupt company operations. The decision to close the facility will be made by the location supervisor in coordination with the facility.

When the decision is made to close the facility, employees will receive notification from their supervisors.

Time off from scheduled work due to emergency closings will be unpaid for all non-exempt employees as defined in Section 2, Definition of Employee Status.

**Employee Performance Review and Planning Sessions**

Supervisors will conduct Performance Reviews and planning sessions with all regular full-time and regular part-time employees after six months of service. Supervisors may conduct informal performance reviews and planning sessions more often if they choose.
Performance reviews and planning sessions are designed for the supervisor and the employee to discuss his/her current job tasks, encourage and recognize attributes, and discuss positive, purposeful approaches for meeting work-related goals. Together, employee and supervisor should discuss ways in which the employee can accomplish goals or learn new skills. The planning sessions are designed for the employee and his or her supervisor to make and agree on new goals, skills, and areas for improvement.

The company directly links wage and salary increases with performance. Your performance review and planning sessions will have a direct effect on any changes in your compensation. For this reason among others, it is important to prepare for these reviews carefully, and participate in them fully.

New employees will be reviewed at the end of their probationary period. After the initial review, the employee will be reviewed according to the regular semi-annual schedule. The company reserves the right to background check employees at any time during their employment.

**Outside Employment**

Employees may hold outside jobs in non-related businesses or professions as long as the employee meets the performance standards of their job description with the company. Unless an alternative work schedule has been approved by a supervisor, employees will be subject to the company’s scheduling demands, regardless of any existing outside work assignments.

The company’s facility space, equipment, and materials are not to be used for outside employment or personal use without approval from the employee’s supervisor.

**Corrective Action**

The company holds each of its employees to certain rules and Standards of Conduct. When an employee deviates from these rules and standards, the company expects the employee’s supervisor to take corrective action.

Corrective action at the company is typically progressive. That is, the action taken in response to a rule infraction or violation of standards typically follows a pattern increasing in seriousness until the infraction or violation is corrected.

The usual sequence of corrective actions includes an oral warning, a **Written Reprimand**, probation, and finally termination of employment. In deciding which initial corrective action would be appropriate, a supervisor will consider the seriousness of the infraction, the circumstances surrounding the matter, and the employee’s previous record.

Though committed to a progressive approach to corrective action, the company considers certain rule infractions and violations of standards as grounds for immediate termination of employment. These include, but are not limited to:

1. Theft or other criminal activity in any form;
2. Frequent absenteeism or absenteeism without proper notice;
3. Insubordinate behavior;
5. Vandalism or destruction of company property;
6. Being on company property during non-business hours;
7. The use of company equipment and/or company vehicles without supervisor approval;
8. Untruthfulness about criminal or personal work history, skills, or training;
9. Divulging company security practices or business practices;
10. Misrepresentations of the company to a patient, a prospective patient, the general public, or an employee; and
11. Failure to follow the company policies or procedures.
12. Failure to report any of the following to the general manager:
   a. Discrepancies identified during inventory, diversion, theft, loss, and any criminal action involving the Dispensary or a dispensary agent;
   b. Any suspicious act involving the sale, cultivation, distribution, processing, or production of marijuana by any person;
   c. Unauthorized destruction of marijuana;
   d. Any loss or unauthorized alteration of records related to marijuana, registered qualifying patients, personal caregivers, or dispensary agents;
   e. An alarm activation or other event that requires response by public safety personnel;
   f. The failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last longer than eight hours; and
   g. Any other breach of security.

Termination of Employment
Termination of employment is an inevitable part of personnel activity within any organization, and many of the reasons for termination are routine. Below are a few examples of some of the most common circumstances under which employment is terminated:

- Resignation – voluntary employment termination initiated by an employee.
- Dismissal – involuntary employment termination initiated by the company.
- Layoff – involuntary employment termination initiated by the company for non-disciplinary reasons.

When a non-exempt employee intends to terminate his/her employment with the company, he/she must resign with the company and provide at least two weeks written notice. Exempt employees must give at least four weeks written notice. The company reserves the right to terminate employment immediately upon notice of resignation by any employee.

Since employment with the company is based on mutual consent, both the employee and the company have the right to terminate employment at will, with or without cause during the probationary period for new employees.

Any employee who terminates employment with the company must return all files, records, keys, and any other materials that are property of the company. No final settlement of an employee’s pay will be made until all items are returned in appropriate condition. The cost of replacing non-returned items will
be deducted from the employee’s final paycheck. Furthermore, any outstanding financial obligations owed to the company will also be deducted from the employee’s final check.

Employee’s benefits will be affected by employment termination in the following manner. All accrued vested benefits that are due and payable at termination will be paid. Some benefits may be continued at the employee’s expense (see Benefits and Services section) if the employee elects to do so. The employee will be notified of the benefits that may be continued and of the terms, conditions, and limitations.

**Safety**

The safety and health of our employees is our foremost business consideration. No employee will be required to do a job that he or she considers unsafe. The company will comply with all applicable workplace safety and health requirements and maintain occupational safety and health standards that equal or exceed the best practices in the industry.

The company will maintain a safety committee, which consists of management and our employees. Our responsibility will be identifying hazards and unsafe work practices, removing obstacles to accident prevention, and helping evaluate the company’s effort to achieve an accident and injury-free workplace. The company pledges to do the following:

1. Strive to achieve the goal of zero accidents and injuries.
2. Provide mechanical and physical safeguards wherever they are necessary.
3. Conduct routine safety and health inspections to find and eliminate unsafe working conditions, control health hazards, and comply with all applicable OSHA safety and health requirements.
4. Train all employees in safe work practices and procedures.
5. Provide employees with necessary personal protective equipment and train them to use and care for it properly.
6. Enforce company safety and health rules and require employees to follow the rules as a condition of employment.
7. Investigate accidents to determine the cause and prevent similar accidents.

The company recognizes that the owners, supervisors, and all other employees share responsibility for a safe and healthful workplace. Management is accountable for preventing workplace injuries and illnesses. Management will consider all employee suggestions for achieving a safer, healthier workplace. Management will maintain an informed level of current workplace safety and health hazards, and regularly review the company’s safety and health programs.

All employees have responsibility for their own safety as well as for the safety of their fellow workers. They are expected to participate in the safety and health programs which includes immediately reporting accidents, hazards, and unsafe work practices to a supervisor or safety committee representative, wearing required personal protective equipment, and participating in and supporting safety committee activities.
The company provides information to employees about workplace safety and health issues through regular internal communication such as:

- Policies and procedures
- Training sessions
- Team meetings
- Bulletin board postings
- Memorandums
- Other written communications

Each employee is responsible for reading the above communications, asking for clarification and is expected to obey safety rules and exercise caution and common sense in all work activities. In the case of an accident that results in injury, regardless of how insignificant the injury may appear, employees should notify their supervisor and complete an incident accident report (see Employee Requiring Medical Attention section).

Health-related Issues
Employees who become aware of any health-related issue, including pregnancy, should notify their supervisor of health status. This policy has been instituted strictly to protect the employee.

A written “permission to work” from the employee’s doctor is required at the time or shortly after notice has been given (except in the case of pregnancy). The doctor’s note should specify whether the employee is able to perform regular duties as outlined in his/her job description.

A leave of absence may be granted on a case-by-case basis. If the need arises for a leave of absence, employees should notify their supervisor.

Employee Requiring Medical Attention
In the event an employee requires medical attention, whether injured or becoming ill while at work, the employee’s personal physician or the workers’ compensation recommended physician must be notified immediately. If it is necessary for the employee to be seen by the doctor or go to the hospital, a family member or emergency contact will be called to transport the employee to the appropriate facility. If an emergency arises requiring Emergency Medical Services to evaluate the injury/illness of an employee on-site, the employee will be responsible for any transportation charges. Furthermore, the company’s employees will not be responsible for transportation of another employee due to liabilities that may occur.

- A physician’s “return to work” notice may be required.
Insurance on Personal Effects
All employees should be sure that their own personal insurance policies cover the loss of anything occasionally left at the facility. The company assumes no risk for any loss or damage to personal property.

Supplies; Expenditures; Obligating the Company
Only authorized persons may purchase supplies in the name of the company. No employee whose regular duties do not include purchasing must incur any expense on behalf of the company or bind the company by any promise or representation without written approval.

Expense Reimbursement
Expenses incurred by an employee must have prior approval by a supervisor. Reimbursement will be made after providing receipts to your supervisor and paid through petty cash on hand or through paycheck payroll reimbursement. Receipts are to be turned in daily unless travelling. Mileage is to be turned in bi-weekly.

Parking
Employees must park their cars in areas designated by the company.

Visitors in the Workplace
To provide for the safety and security of employees, patients, and the facilities of the company, only authorized visitors are allowed in the workplace. Restricting unauthorized visitors helps ensure security, decreases insurance liability, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances.

Employee visits are allowed for short, purposeful visits, which conform to DPH and local restrictions for medical marijuana facilities. Ask your supervisor if you have questions. Due to the nature of our business and patient confidentiality, employee visitors may be onsite for no more than 15 minutes and are not allowed in limited access areas.

Visitors are never allowed into limited access areas unless it is necessary for service or repair allowed by rule and they are issued a visitor badge that remains visible throughout the entire visit, have been properly signed in and out of the , and are supervised by a company employee at all times.
Compliance with Immigration Laws
The company employs only United States citizens and those non-U.S. citizens authorized to work in the United States in compliance with the Immigration Reform and Control Act of 1986.

Each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with the company within the past three years or if their previous I-9 is no longer retained or valid.

Solicitation
No person (including patients, visitors, and staff), organization or agency may solicit, conduct business or raise funds on company property unless approved by management. Solicitation must be defined as any effort to sell goods or services or to raise money on behalf of any company, club, society, religious organization, political party, or similar organization and/or the distribution of any materials such as leaflets or flyers for those organizations unless approved by management.

Standards of Conduct
Introduction
The standards of conduct for the company are important, and the company regards them seriously. All employees are urged to become familiar with these rules and standards. In addition, employees are expected to follow the rules and standards faithfully in doing their own jobs and conducting the company’s business. Please note that any employee who deviates from these rules and standards will be subject to Corrective Action, up to and including termination of employment.

While not intended to list all the forms of behavior that are considered unacceptable in the workplace, the following are examples of rule infractions or misconduct that may result in disciplinary action, including termination of employment.

1. Theft or inappropriate removal or possession of property;
2. Falsification of timekeeping records (see );
3. Falsification of patient or sales records;
4. Working under the influence of alcohol or illegal drugs (see );
5. Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace (see );
6. Fighting or threatening violence in the workplace;
7. Boisterous or disruptive activity in the workplace;
8. Negligence or improper conduct leading to damage of company-owned or patient-owned property;
9. Insubordination or other disrespectful conduct;
10. Violation of safety or health rules;
11. Smoking in the workplace;
12. Sexual or other unlawful or unwelcome harassment (see );
13. Excessive absenteeism or any absence without notice (see );
14. Unauthorized use of telephones, or other company-owned equipment (see );
15. Using company equipment for purposes other than business (i.e. playing games on computers or personal Internet usage);
16. Unauthorized disclosure of business practices or confidential information;
17. Violation of personnel policies;
18. Unsatisfactory performance or conduct; or
19. Allowing weapons on-site.

**Compliance with Pennsylvania Medical Marijuana Law**
The company employees work in a regulated industry. Therefore, strict adherence to Pennsylvania marijuana regulations is required. Many local ordinances also apply, make sure you are familiar with local laws in your area of residence. Facility managers will be completing to ensure facility compliance. If you ever have a question regarding appropriate conduct, please notify your supervisor. If an answer is not provided in a timely manner, continue to request information from all supervisors, the president, or the board of directors until a thorough, clear answer is provided.

**Pennsylvania Prohibitions**
You must report any law enforcement encounter, other than minor traffic violations, immediately to your supervisor as this information must be reported to the Department of Public Health within ten days of occurrence. Not reporting this vital information can lead to immediate termination.

Be mindful that violation of any of these laws can jeopardize the continued operations of our entire organization.

**Attendance and Punctuality**
The company expects that every employee will be regular and punctual in attendance. This means being in the office, ready to work, at their starting time each day. Absenteeism and tardiness places a burden on other employees, our patients and on the company.

If you are unable to report for work for any reason, notify your supervisor before regular starting time. You are responsible for speaking directly with your supervisor about your absence. In the case of leaving a voice-mail message, a follow-up call must be made within two hours. Email and text are not appropriate methods of communicating an absence.

Should undue tardiness become apparent, disciplinary action may be required.

If there comes a time when you see that you will need to work some hours other than those that make up your usual work week, notify your supervisor at least seven working days in advance. Each request for special work hours will be considered separately, in light of the employee’s needs and the needs of the company. Such requests may or may not be granted.

**Absence Without Notice**
When you are unable to work owing to illness or an accident, please notify your supervisor. This will allow the company to arrange for temporary coverage of your duties, and helps other employees to continue work in your absence. If you do not report for work and the company is not notified of your
status, it will be assumed after two consecutive days of absence that you have resigned, and you will be removed from the payroll.

If you become ill while at work or must leave the office for some other reason before the end of the workday, be sure to inform your supervisor of the situation.

**Harassment, including Sexual Harassment**
The company is committed to providing a work environment that is free of discrimination and unlawful harassment. Actions, words, jokes, or comments based on an individual’s sex, race, ethnicity, age, religion, or any other legally protected characteristic will not be tolerated.

If you believe you have been the victim of harassment, or know of another employee who has, report it immediately to your supervisor. If your supervisor is the source of harassment please raise your concerns directly to executive management or the board of directors. Employees can raise concerns and make reports without fear of reprisal.

Any employee who becomes aware of possible harassment should promptly advise executive management or the board of directors who will handle the matter in a timely and confidential manner.

**Communications and Computer Use**
The company’s computer infrastructure and telephones are intended for the use of serving our patients and in conducting the company’s business.

Personal use during business hours is discouraged except for extreme emergencies. All personal telephone calls and emails should be kept brief to avoid congestion of the telephone line. Social media use is restricted to job related activities only.

To respect the rights of all employees and avoid miscommunication in the facility, employees must inform family members and friends to limit personal correspondence during working hours.

If an employee is found to be deviating from this policy, he or she will be subject to disciplinary action (see Corrective Action section).

**Public Image and Dress Code**
A professional appearance is important anytime that you come in contact with patients or potential patients. Employees should be well groomed and dressed appropriately for our business and for their position in particular.

**DISPENSARY STAFF:**
The company prefers Dispensary employees to dress in business casual attire. The following items are considered inappropriate working attire for the company Dispensary locations:

- Spaghetti-strapped shirts
- Tank tops or revealing shirts
- Short miniskirts (skirts must be to the knee)
Sheer clothing
- T-shirts with inappropriate or offensive gestures or advertising
- Shorts
- Jeans with holes
- Hats

**CULTIVATION STAFF AND MANUFACTURING STAFF:**
The company provides cultivation and manufacturing employees with scrubs which are laundered weekly. The following items are considered inappropriate working attire for the company grower/processor facilities:

- Open-toe shoes
- Shoes with holes
- Clothing, shoes, and/or undergarments that have been worn in another cultivation facility
- Unsecured hair
- Excessive facial hair

Consult your supervisor if you have any questions about appropriate work attire.

**Substance Abuse**
The company is committed to providing a safe and productive workplace for its employees. In keeping with this commitment, the following rules regarding alcohol and drugs of abuse have been established for all staff members, regardless of rank or position, including both regular and temporary employees. The rules apply during working hours to all employees of the company while they are on company premises or elsewhere on company business.

Employees who possess a Pennsylvania Medical Marijuana Registry Card may medicate as necessary for their condition off company premises. No medicating may be done onsite. No used paraphernalia or medical marijuana medicine may be brought on company premises.

The manufacture, distribution, possession, sale, or purchase of controlled substances of abuse on company property is prohibited.

Being under the influence of illegal drugs, alcohol, or substances of abuse on company property is prohibited. Possessing any illegal drugs, alcohol, or substances of abuse including narcotic prescriptions is prohibited on company property. Any prescription narcotic or opiate medicating must be done off company premises and narcotic and opiate prescriptions may not be on company premises. Working while under the influence of prescription drugs that impair performance is prohibited.

Taking trade or tips from patients in the form of illegal drugs, alcohol, or prescription medication is strictly prohibited. No discussion of illicit drugs is allowed on company premises between employees and patients.
The above rules are strictly enforced for insurance, legal and security purposes. Any violation of these rules will result in immediate termination.

Consistent with the rules listed above, any of the following actions constitutes a violation of the company’s policy on drugs and may subject an employee to disciplinary action, up to and including immediate termination:

- Using, selling, purchasing, transferring, manufacturing, or storing an illegal drug or drug paraphernalia, or attempting to or assisting another to do so, while in the course of employment.
- Working or reporting to work, conducting company business or being on company property while under the influence of an illegal drug or alcohol, or in an impaired condition.

**Tobacco Products**
The use of tobacco products is not permitted anywhere on the company’s premises except in authorized and designated locations outside the facility. Employees must follow all rules posted in designated smoking areas and adhere to all policies associated with this policy (see [Break Periods](#) and [Safety](#)).

**Internet/email Use**
The company employees are allowed use of the internet and e-mail when necessary to serve our patients and conduct the company’s business.

Employees may use the internet and email when appropriate to access information needed to conduct business of the company. Employees may use e-mail when appropriate for company business correspondence.

Use of the Internet and email must not disrupt operation of the company computer network. Use of the internet must not interfere with an employee’s productivity. Employees are responsible for using the Internet and email in a manner that is ethical and lawful.

Employees may not write, send or receive data through the internet or email that contains content that could be considered discriminatory, offensive, obscene, threatening, harassing, intimidating or disruptive to any employee or other person. Examples of unacceptable content include (but are not limited to) sexual comments or images, racial slurs, gender-specific comments or other comments or images that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation or any other characteristic protected by law.

Internet messages are public and not private. The company reserves the right to access and monitor all files and messages on its systems. Likewise, law enforcement may confiscate all computer property from our locations. Therefore, it is of utmost importance to ensure that internet communications done are appropriate to your job scope and will not reflect negatively on the company should legal matters arise.
**Use of Company Resources**
Use of company time, equipment, or any other resources for any non-work related reason is strictly prohibited unless authorized by a supervisor (i.e. staff volunteer programs, MDA lock-up, copies for schools, etc.) and may result in termination.

**Wage and Salary Policies**

**Wage or Salary Increases**
Each employee’s hourly wage or annual salary will be reviewed at least once each year. The employee’s review date will usually be conducted on or about the anniversary date of employment or the date of the previous compensation review. Such reviews may be conducted more frequently for a newly created position, or based on a recent promotion.

Increases will be determined by the ability of the company to financially support them, on the basis of performance, adherence to company policies and procedures, and the ability to meet or exceed duties per job description and achieve performance goals (see Performance Review/Planning Sessions).

Although the company’s salary ranges and hourly wage schedules will be adjusted on an ongoing basis, the company does not grant “cost of living” increases. Performance and location success is the key to wage increases in the company.

**Timekeeping/recordkeeping**
Accurately recording time worked is the responsibility of every non-exempt employee. Time worked is the time actually spent on a job(s) performing assigned duties. The company does not pay for extended breaks or time spent on personal matters.

Your timesheet and time clock entries are a legal instrument. Altering, falsifying, tampering with time records, or recording time on another team member’s time record will result in disciplinary action, including termination of employment.

Authorized personnel will review time records each week. Any changes to an employee’s time record must be approved by his or her supervisor. Questions regarding the timekeeping system or time cards should be directed to your supervisor.

**Overtime**
The company business hours vary by location. Overtime compensation is paid to non-exempt employees in accordance with federal and state wage and hour restrictions. Overtime is payable for all hours worked over 40 per week at a rate of one and one-half times the non-exempt employee's regular hourly rate. Time off on personal time, holidays, or any leave of absence will not be considered hours worked when calculating overtime. In addition, vacation time does not constitute hours worked. All overtime work performed by an hourly employee must receive supervisor’s prior authorization. Overtime worked without prior authorization from your supervisor may result in disciplinary action. Your supervisor’s signature on a timesheet or time clock entry authorizes pay for overtime hours worked.
Most employees must be paid one and one-half times their regular hourly rate for all hours worked in excess of 40 hours in a given work week. However, state law does not require overtime after eight hours in a day. Some employees are exempt from overtime, such as executives, professionals, and some seasonal workers.

If an employee is a non-exempt employee, meaning an employee who is due overtime, the employer may not award compensatory time in place of paying overtime compensation. For more information about Federal Overtime Pay Laws, visit the U.S. Department of Labor website.

For more information about State Overtime Pay Laws, visit the Pennsylvania Department of Labor & Industry website.

Paydays
All employees are paid bi-weekly. In the event that a regularly scheduled payday falls on a holiday, employees will receive pay on the next day of operation. If a regular payday falls during an employee’s vacation, the employee’s paycheck will be available upon his/her return from vacation.

Paychecks will not, under any circumstances, be given to any person other than the employee without written authorization. Paychecks may also be mailed to the employee’s address or deposited directly into an employee’s bank account upon request. The company reserves the right to pay employees with cash.

Benefits and Services

Introduction
The company offers a benefit program for its regular full-time and regular part-time employees. However, the existence of these programs does not signify that an employee will necessarily be employed for the required time necessary to qualify for the benefits included in and administered through these programs.

Group Insurance
The company offers the following health and life insurance programs for regular full-time employees (as determined by the carrier of the policies).

[ENTER BENEFIT QUALIFICATIONS AND DETAILS]

This manual does not contain the complete terms and/or conditions of any of the company’s current insurance benefit plans. It is intended only to provide general explanations. If there is ever any conflict between the manual and any documents issued by one of the company’s insurance carriers, the carrier’s guideline regulations will be regarded as authoritative.
**Social Security/Medicare**
The company withholds income tax from all employees' earnings and participates in FICA (Social Security) and Medicare withholding and matching programs as required by law.

**Vacation**
The company encourages all employees to take time for themselves to rejuvenate and rest. Regular breaks from daily work make everyone more productive. The company offers employees unpaid vacation time with at least two weeks prior approval and written notice to your supervisor. As our business grows we look forward to offering a paid vacation package for all employees.

**Holidays**
The company observes the following unpaid holidays per year for all employees:

- New Year’s Day
- Thanksgiving Day
- Christmas Day

**Jury Duty or Military Leave**
Employees will be granted time off to serve on a jury or military leave without pay unless required by law. However, all regular employees both full-time and part-time will be kept on the active payroll until their civic duties have been completed. A copy of the jury duty summons and all other associated paperwork are required for the personnel file.

**Training and Professional Development**
The company recognizes the value of professional development and personal growth for employees. As our business grows we look forward to offering employees opportunities to attend classes and seminars that will further their job skills and performance.

Dispensaries must ensure that all dispensary agents complete training prior to performing job functions. Training must be tailored to the roles and responsibilities of the job function of each dispensary agent, and at a minimum must include training on confidentiality, security, and other topics as specified by the Department. At a minimum, staff must receive 8 hours of on-going training annually.

Meanwhile, if you find opportunities for growth please discuss them with your supervisor to see how we can help accommodate your request.

**Employee Purchases**
The company provides a [%] discount on all center products to employees and employees’ properly registered extended family members. Employees must possess a valid registry card to purchase medical marijuana products. Additional discounts do not apply to sale items.

**Internal Job Transfers**
It is the policy of the company to provide opportunities for employees to apply for job openings within the company when opportunities arise. Promotions and transfers will be considered by evaluating each
individuals job-related skills, knowledge, and experience; ability, efficiency, initiative, and attitude; and attendance record.

In an effort to ensure that the best interest of the company and the individual are being served, the company may transfer employees to different positions when deemed necessary to maintain efficient operations or production.

**Employee Communications**

**Staff Meetings**
Monthly to quarterly staff meetings will be coordinated by your supervisor. These informative meetings are mandatory and allow employees to be informed on recent company activities, changes in the workplace and employee recognition.

**Bulletin Boards**
Bulletin boards placed in designated areas at each location provide employees access to important posted information and announcements. The employee is responsible for reading necessary information posted on the bulletin boards.

**Email Communication**
The company relies on email communication to disseminate information about policies and procedures to employees. Each employee will be issued an account and is responsible for retrieving and responding to items contained within.

**Suggestion Box**
The company encourages employees who have suggestions that they do not want to offer verbally or in person to write them down and leave them in the same suggestion box used for patients or mail to our administrative office. If this is done anonymously, every care will be taken to preserve the employee’s privacy. The location supervisor checks the box on a regular basis.

**Procedures for Handling Complaints**
Under normal working conditions, employees who have a job-related problem, question or complaint should first discuss it with their immediate supervisor. At this level, employees usually reach the simplest, quickest, and most satisfactory solution. If the employee and supervisor do not solve the problem or the issue is regarding the employee’s immediate supervisor the company encourages employees to notify executive management and then the board of directors as necessary for resolution.

**Acknowledgement**
I have read and agree to abide by the company Employee manual dated ________, 20__.
Employee Signature

Date

Witnessed by:

Company Representative

Date
Exhibit: Visitor Log

*This form should be completed online.

VISITOR LOG

Date:*  Visitor Name:*  

Company/Organization (If applicable):  

Attach photocopy of identification document:  

Select File  

Visit Location:*  

Badger Number:*  

Time In:*  Time Out:*  

Purpose of Visit:*  

Comments:  

Manager Signature:*  

Submit
Exhibit: Employee Confidentiality Agreement

Employee Confidentiality Agreement

This Employee Agreement is made by and between the company, a Medical Marijuana Treatment Center (known as “Dispensary”) operation, its directors, members, and agents, with principal place of business at ________________________________, and ______________________________________ (“Employee”), an Employee or Agent having his or her principal address at _______________________________________________.

Section 1. Employee/Agent's Responsibility/Authority. Employee shall perform, be responsible for, and have the authority to perform lawful activities under Pennsylvania medical marijuana law.

Section 2. Compliance with Law. In performing its responsibilities and authorities, Employee shall use his/her best efforts at all times to comply with applicable district and local laws.

Section 3. Compensation of Agent. Agent is a legal, hourly or salaried employee of the company or an independent contractor performing service for the company.

Section 4. Confidentiality. Because of the particular nature of the business and products, all information of any kind regarding the business, security system information, operations, patients of the business, products, licensing information, financial information, or any other sensitive information must be considered proprietary and confidential information and trade secrets of the company (“Confidential Information”) whether so designated at the time of disclosure or not. Confidential Information shall be deemed the property of the company. The existence and terms of this Agreement, and the fact and substance of all discussions or correspondence relating to employment or business practices of the company shall also be included in the term “Confidential Information” and considered confidential information by the Employee and shall not be disclosed without the consent of the company. This Agreement shall become effective as of the date on which it is executed by Employee (“Effective Date”), and shall cover all Confidential Information disclosed before or after the Effective Date. This Agreement shall continue in perpetuity from the Effective Date. Disclosure of Confidential Information may be grounds for immediate termination of employment and/or litigation against Employee.

In the event that Employee (a) needs to make disclosures of Confidential Information for securities law purposes, or (b) are required by law, regulation, government agency or court order, discovery request, subpoena, or civil investigative demand to disclose any Confidential Information, Employee shall (i) provide the company with prompt written notice so that the the company can work with Employee to limit the disclosure to the greatest extent possible consistent with legal obligations (provided that disclosure of the name of the other party shall never be made without that party’s prior written consent or to avoid a contempt citation from a governmental authority or court duly empowered to issue a citation), and (ii) shall use reasonable efforts to minimize such disclosure and to obtain an assurance that the Confidential Information shall be accorded confidential treatment, and shall notify the disclosing party contemporaneously of when the disclosure has been made.
Section 4. **Term of Agreement.** This Agreement shall be in full force and effect until the terminated by the company in writing.

Section 5. **Other Governing Documents.** This Agreement is subject to the provisions of the Articles of Incorporation of the company, the Bylaws of the company, and rules and policies as may be established and amended from time to time by the company or its Members; such Articles, Bylaws, rules and regulations are incorporated herein by this reference as though copied in their entirety and, with such incorporation, this Agreement constitutes the total agreement between Employee and the company with respect to the matters covered by this Agreement.

Section 6. **Amendment/Modification.** This Agreement may be amended or modified only by a written instrument duly executed by the company and Employee.

Section 7. **Applicable Law.** This Agreement shall be construed in accordance with the laws of the State of Pennsylvania.

Section 8. **Assignment; Binding Effect.** This Agreement may not be assigned by the Employee. This Agreement shall be binding upon the parties, their successors and assigns.

Section 9. **Counterparts.** This Agreement may be executed in counterparts and the execution of any counterpart by a party shall bind such party as though executed by both parties; the counterparts, when taken together, shall constitute one and the same agreement.

IN WITNESS WHEREOF, the parties have caused this Agreement to be executed to be effective on the last of the dates below their signatures.

Employee

____________________________________
Print Name: ___________________________

Date: ___________________, 20___

the company

By: _____________________________
Print Name and Title:

Date: ___________________, 20___

Date: ___________________, 20___
Facility Audit Log

<table>
<thead>
<tr>
<th>Date:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Auditor:</td>
<td></td>
</tr>
<tr>
<td>Type of audit:</td>
<td></td>
</tr>
<tr>
<td>Manager on duty:</td>
<td></td>
</tr>
</tbody>
</table>

Audit requirements:
(D) = Daily  
(M) = Monthly  
(S) = Semi-Annually

### COMPLIANCE ITEMS

<table>
<thead>
<tr>
<th>Question</th>
<th></th>
</tr>
</thead>
</table>
| Is every person on-site properly identified with an identification badge or visitor's badge? (D) | ○ Yes  
   ○ No  
   ○ Other |
| Is there any evidence of marijuana having been consumed on-site? (D)    | ○ Yes  
   ○ No  
   ○ Other |
| Is any marijuana or associated product visible to a person outside the facility? | ○ Yes  
   ○ No  
   ○ Other |

**Auditor Comments on Compliance Items**

### PERSONNEL AND TRAINING

<table>
<thead>
<tr>
<th>Question</th>
<th></th>
</tr>
</thead>
</table>
| Is each person assigned to a job function properly trained for that duty? (D) | ○ Yes  
   ○ No  
   ○ Other |
| Does initial training include a thorough review of hazards and accidents associated with the job? (S) | ○ Yes  
   ○ No  
   ○ Other |
Is adequate instruction in the use of personal protective equipment provided? (S)

☐ Yes
☐ No
☐ Other

Is training for the use of emergency equipment provided? (S)

☐ Yes
☐ No
☐ Other

Are workers knowledgeable in the "Right to Refuse" procedures? (S)

☐ Yes
☐ No
☐ Other

Auditor Comments on Personnel and Training

ENVIRONMENT

Did temperature or humidity readings reach outside limits since the previous reading? (D)

☐ Yes
☐ No
☐ Other

Are resources available to deal with very hot or very cold conditions (drinking water, lined gloves, insulated boots)? (D)

☐ Yes
☐ No
☐ Other

Is the rain gear that is provided comfortable, and light enough so as not to constitute a hazard? (D)

☐ Yes
☐ No
☐ Other

Are work surfaces and grip surfaces safe when wet? (S)

☐ Yes
☐ No
☐ Other

Do workers know the symptoms of heat cramps, heatstroke? (S)

☐ Yes
☐ No
☐ Other

Auditor Comments on Environment

WORK PROCESS
<table>
<thead>
<tr>
<th>Question</th>
<th>Option 1</th>
<th>Option 2</th>
<th>Option 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are repetitive motion tasks properly paced and kept to a minimum? (D)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Do joint committee members have access to material safety data sheets? (M)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Are workers informed (by hazard signs and tags)? (D)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Have all trucks, forklifts and other equipment been inspected and maintained? (M)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Are lockout procedures followed? (S)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Is ventilation equipment working effectively? (D)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Is fume and dust collection hood properly adjusted? (D)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Auditor Comments on Work Process</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>FIRE EMERGENCY PROCEDURES</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is there a clear fire response plan posted for each work area? (S)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Do all workers know the plan? (M)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
<tr>
<td>Are drills held regularly? (S)</td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
</tr>
</tbody>
</table>
Environmental Plan

Environmental Plan Summary
The Environmental Stewardship Plan describes how to minimize the environmental impact of registered medical marijuana dispensary operations through the conservation of resources and the application of sustainable practices to be implemented at all facilities. A commitment to minimizing the company’s carbon footprint is signed and established through the implementation of best practices, innovative equipment and appliances, and the minimization of greenhouse gas emissions and energy consumption.

Provisions are included throughout to ensure the highest cultivation standards are applied during the company’s contribution to the creation and development of a sustainable cultivation model and participation in technological advancements.

Energy efficient operational practices are detailed in full, with special focus on electricity use, LED bulbs, cultivation facility design and the use of reflective materials; material selection, recycling, composting, and pest control; and the minimization of resource needs through means of rain collection, reusing supplies and avoiding extensive use of hydroponics. The treatment of wastewater and runoff is addressed with consideration for the local municipal water treatment plan. It is established that organic cultivation practices are enforced.
Research and Development
The company is dedicated to minimizing the carbon footprint and environmental impact of our facilities through conserving resources and using sustainable practices whenever available. There are few practical and significantly effective options readily available to current producers, however many additional sustainable technologies are emerging quickly. As these sustainable options develop, it is important to follow technology advancements and participate in research and development opportunities to maintain the highest cultivation standards possible and to contribute to the creation of a sustainable cultivation model.

Minimizing Carbon Footprint
Energy-efficient equipment and appliances can reduce energy consumption and reduce operation costs significantly, especially over time. While lighting is the most energy-intensive input for cultivation facilities, there are options to reduce energy consumption for indoor cultivation. The company will use the following best practices, equipment, and tools to maximize efficiency, minimize greenhouse gas emissions, and minimize energy consumption.

Electricity Use
The company will schedule indoor lighting on cycles during the night to reduce their demand of electricity during the day while also eliminating excess energy used for heating during night and air conditioning during the day. Indoor production facilities that concentrate their energy usage throughout the night rather than the high-electric use times throughout the day significantly reduce their climate effect (O'Hare, Sanchez, & Alstone, 2013). The company will use electronic ballasts for all lighting sources requiring a ballast as electronic ballasts reduce electricity usage, reduce heat, reduce the need for air-conditioning and increase light output (National Lighting Product Information Program (NLPIP), 2000). In addition, when installing new electrical equipment, the company will use products with the Energy Star seal whenever feasible.

LED Lamps
The company will use high efficiency CFLs or LEDs whenever possible in non-grow spaces, such as offices and restrooms. The company also plans to use LED lamps as the primary source of lighting in vegetative, mother, and propagation spaces, as well as supplementary lighting in flowering spaces. LED lamps use only 6 to 9 Watts, and can reduce electricity use up to 70% compared to the traditional high-pressure sodium (HPS) or metal-halide (MH) lamps (U.S. Department of Energy, 2008). The low voltage also reduces the risk of accidental fires or electric shocks if exposed to moisture. LED lamps do not experience degradation and rarely need replacing, opposed to HPS and MH, which need replacing every 3-4 cultivation cycles (O'Hare, Sanchez, & Alstone, 2013). LED lamps are easy and safe to replace because they do not contain vapors, mercury or glass. As mentioned, the company is currently receiving consulting services from Denver Relief Consulting and is involved with a research and development project incorporating LED lights into cultivation facilities. As findings are published, the company will incorporate changes in the operational procedures of the cultivation facility to ensure high standards of efficiency.
Minimizing Environmental Impact
The company plans to minimize environmental impact by selectively choosing sustainable and local materials and encouraging sustainable practices throughout the operations of all facilities. As options to reduce environmental impact become more feasible, the company will continue to adopt sustainable practices. The company plans to adopt the following impact-minimizing practices:

Material Selection
The company will use biodegradable and/or recyclable packaging for all storage, handling, and packaging needs. The company will strive to reuse all internal packaging products for as long as the products remain functional in an effort to reduce the consumption of resources. The company will take specific measures to elongate the life of internal storage, labeling, and packaging products, such as sanitization.

Recycling
The company will provide recycling bins at all the company locations for assorted plastics, glass, aluminum, and paper products. The company will engage with local waste management to schedule recycling services and pick-up. The company will also ensure the proper disposal of all regulated materials including lamps, nutrient waste, and electronics.

Composting
The company can minimize cultivation facility waste through utilizing local composting services like [COMPOSTING SERVICE] to collect used organic material and create new, nutrient-rich, fertile, soil through composting. The company plans to use organic soil as the primary cultivation medium and will coordinate with local composting companies to collect used soil that would otherwise be placed into a landfill. Composting unusable plant material and soil provides a valuable opportunity to create nutrient-rich soil that stimulates healthy plant growth, while reducing soil and nutrient consumption.

Pest Control
The company will minimize exposure of harmful pesticides to employees, patients, and the environment by using alternative methods of pest control including predator insects, naturally derived foliar sprays, and other organic applications. By using these organic methods, the company will minimize any toxic wastewater or run-off produced as well as employee and patient exposure. When pesticide use is absolutely necessary, the company will acquire a certified sprayer to execute the task to ensure accurate application.

Minimizing Resource Needs for Production
The company plans to minimize resource needs for cultivation by selectively choosing sustainable materials and encouraging sustainable practices throughout all operations. As sustainable options become more economical and available, the company will continue to adopt sustainable practices to minimize environmental impact. The company plans to implement the following practices to minimize resource needs:
Avoiding Hydroponic Cultivation
Indoor cultivation can be water-intensive, especially when using a hydroponic system. Hydroponic cultivation also produces more nutrient pollution when compared to other growing methods. (O’Hare, et al. 2013). For these reasons, the company will refrain from operating a completely hydroponic system.

Rain-collection
The company plans to utilize rainwater for power washing and air conditioner make-up water to minimize water needs and decrease pollution from storm water. Harvesting rainwater reduces water consumption, eliminates periodic demand stress on public water sources and reduces run-off and its consequent harmful impacts.

Re-using Supplies
The company plans to incorporate reusable materials for all available cultivation supplies, such as vessels used for containing plants, nutrients, soil and water. The company will also incorporate reusable tools made from recycled materials for cultivation, such as plant-reinforcement posts, watering and spraying devices, reflective materials and storage containers. These supplies will be reused after a sterilization process and will significantly reduce the resource needs of the company.

Electronic Communications
The company plans to use email services as the primary channel of communication between management, employees, patients, caregivers, and vendors. Using paperless means of communication will reduce the paper resource needs of the company and reduce paper-waste generated from internal communications. The company will also utilize cloud-based tracking systems to store electronic forms of all compliance documents, allowing mobile access and reducing paper waste.

Alternative Energy
The company plans to incorporate alternative energy sources as opportunities become economical for the company and available through local energy companies. The company plans to participate in local renewable energy programs such as [PROGRAM] and [PROGRAM]. Another option to offset energy usage is to purchase carbon offsets to mitigate greenhouse gas emissions from the company electricity use, transportation, and other sources.

Treatment of Wastewater and Run-off
The company does not produce toxic wastewater or runoff during the cultivation of cannabis through the use of organic soilless media derived from cocoa fibers, foliar sprays and nutrient supplements. Using organic methods eliminates exposure to harmful pesticides, synthetic additives, and toxic wastewater for employees, patients and the environment. If an event requiring a treatment of wastewater or runoff occurs, the company will dispose of wastewater according to procedures outlined by the [LOCAL] municipal wastewater treatment plant.

Scrubbing Exchanged Air
The company plans to maintain superior air-quality inside the cultivation facility for employees and plants by investing in air-scrubbing technology. The company will also explore options for incorporating
a negative air machine with an air-scrubber during operational activities that produce higher levels of air contaminants. A negative air machine application helps limit the spread of contaminants to other areas inside the structure and will aid the company in maintaining a clean and healthy environment.

**Co-location of Growing Facilities and the Means of Production and Packaging**
An important goal of the company is to obtain a second registration in order to co-locate cultivation, production, and packaging with other registered cultivation facilities, medically-infused productions, and dispensaries. Co-locating will stream-line processes and increase production efficiency while reducing excess resource and energy consumption that would otherwise be necessary to carry out the operations of separate facilities.

**Protecting Employees and Patients**
The company will adopt best industry practices throughout all cultivation processes to protect employee safety, ensure patient safety, as well as product quality. The cultivation process shall use best practices to limit contamination, including but not limited to mold, fungus, bacterial diseases, rot, pests, non-organic pesticides, mildew, and any other contaminant identified as posing potential harm. These measures will require all cultivation operations be consistent with U.S. Department of Agriculture organic requirements at 7 CFR Part 205. The company policy also prohibits the application of any non-organic pesticide in the cultivation of marijuana. Media for cultivation shall meet the U.S. Agency for Toxic Substances and Disease Registry’s Environmental Media Evaluation Guidelines for residential media levels.

**Outdoor and Greenhouse Cultivation**
Legal outdoor and greenhouse productions will significantly reduce the environmental impact of cannabis cultivation by reducing carbon production, reducing waste water pollution, reducing the burden on water treatment facilities, reducing waste and negative effects of exposure to heavy metal toxins from lighting and lamps, while also creating substantial reductions in energy use, subsequently reducing energy costs of local and state energy (Okanogan Cannabis Association, 2013). For these reasons, the company plans to incorporate greenhouse cultivation facilities as state and local laws are developed to allow such conversions and expansions.

**References**


Facilities and General Operations Plan

Facilities and General Operations Plan Summary
The Facilities and General Operations Plan describes measures for the successful implementation and maintenance of detailed written operating procedures legally required for the company facilities. The company will maintain written operating policies and procedures for each of its facilities, including those contained herein. All dispensary agents and employees will be held accountable for the responsible operation of facilities.

The General Manager is responsible for maintaining sufficient order and cleanliness and for the reporting of maintenance in the Facility Maintenance Log, of which a sample form is included. The General Manager will ensure the discipline or termination of any person contributing to operational negligence, that the Dispensary possesses adequate, workman’s compensation, liability insurance or adequate self-insurance escrow at all times, and that all Dispensary locations remain compliant with ADA guidelines.

Additional facility maintenance procedures are detailed, including those pertaining to hours of operation, personnel hygiene and sanitation, hazardous materials and employee safety, security equipment, daily walk-throughs and closing procedures. Any operating procedure updates will be submitted to the Department.

Facilities and Operations - General

Operating Procedures Required
The company must maintain and follow written operating procedures (contained herein) for each Dispensary facility. Procedure updates must be submitted to the Department in accordance with the company’s.

Responsible Operations Required
Every employee and dispensary agent of the company is accountable for the responsible operation of all Dispensary facilities. The General Manager shall ensure that any person contributing to the any of the following is properly disciplined, terminate, or brought to the board of directors for a decision:

1. Incompetent or negligent operation;
2. Failure to maintain the Dispensary in a clean, orderly, and sanitary fashion; or
3. Permitting a person to use a registration card belonging to a different person;
4. Failure to prevent a patient from self-administering medical marijuana at the facility unless the patient is also an employee of the dispensary, and the dispensary permits self-administration of medical marijuana at the facility by the employees. 28 Pa. Code § 1161.22(b)(3)
Insurance Required
The General Manager must ensure the Dispensary possesses adequate liability insurance or an adequate self-insurance escrow at all times.

1. The company shall obtain and maintain general liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually;
2. Product liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate, annually.
3. The deductible for liability policies shall be no higher than $5,000 per occurrence.
4. If the company is unable to obtain minimum liability insurance coverage as required at any time, it must be documented and the general manager must place in escrow a sum of no less than $250,000, to be expended for coverage of liabilities.
5. The escrow account must be replenished within 10 business days of any expenditure.
6. Reports documenting compliance with insurance or escrow requirements shall be made in a manner and form determined by the Department.

ADA Compliance
The General Manager must ensure the company’s Dispensary location(s) remain compliant with ADA guidelines.

Certificate Must Be Posted
A certificate of registration must be posted in a conspicuous location at each Dispensary location.

No Visible Marijuana
No medical marijuana or paraphernalia at the dispensary may be visible to any person from the exterior of any the company facility.

Daily Walk-Through Required
The General Manager must perform or oversee a daily walk-through to ensure compliance with all policies in accordance with the company’s. The General Manager is responsible for the daily completion of the Daily Walk-Through Log.

Maintenance of Logs
All records and log entries (maintenance, disposal, etc.) described and required herein must be maintained in a central cloud database (Adobe Forms Central) and reviewed by the General Manager in accordance with the company’s Recordkeeping, Reporting, and Notifications Plan.

Hours of Operation and Required Personnel Onsite

Service Hours
The dispensary is open to registered patients and caregivers Monday through Saturday between the hours of 9:00 am and 7:00 pm and Sunday from 11:00 am to 5:00 pm.
**General Manager Required Onsite**
The general manager must maintain and enforce a schedule to ensure that at least one executive or manager is on site at all times.

**Physician or Pharmacist Required Onsite – Primary Dispensary**
The Physician or Pharmacist must be present at the facility at all times during the hours the facility is open to dispense or offer to dispense medical marijuana to patients and caregivers.

28 Pa. Code § 1161.25(a)

**Secondary and Tertiary Dispensaries**
A physician assistant or a certified registered nurse practitioner may be present onsite at each of the other locations instead of a physician or pharmacist, if one is not available.

28 Pa. Code § 1161.25(b)

**Marijuana Consumption Prohibited**

**No Violations Allowed**
The company must not tolerate any medical marijuana or marijuana paraphernalia that shows evidence of the medical marijuana having been consumed or partially consumed on the registered premises. Any person in violation of this policy must be disassociated with the company.

**General Manager Inspection**
The General Manager must oversee walk-throughs daily, perform scheduled, and cause to be performed random audits by a third-party to inspect for evidence of on premises consumption in accordance with the company’s.

**Patient Employee Exception**
For its employees that are also registered patients, the company will allow the discrete self-administration of medical marijuana at the facility. Employees will be discouraged from using vaporizable products while onsite.

28 Pa. Code § 1161.22(b)(3)

**Limited Access Areas**

**Adherence to Law and Regulation**
The company must comply with all state laws and regulations in regards to limited access areas.

**Establishment of Limited Access Areas**
The General Manager is responsible for the establishment of maintenance of limited access areas in each the company Dispensary facility. Such areas must limit access to specifically authorized personnel, which includes only the minimum number of employees essential for efficient operations. All areas of ingress and egress to a limited access area must be clearly identified by the posting of a sign which shall be not less than 12 inches wide and 12 inches long, composed of letters not less than 1/2 inch in height,
which must state: “Do Not Enter — Limited Access Area — Access Limited to Authorized Personnel and Escorted Visitors Only.”

28 Pa. Code § 1161.26(e)(1)

Diagram Filed With the Department
The General Manager shall file a diagram clearly identifying all limited access areas of the registered premises, in the form and manner determined by the Department, reflecting walls, partitions, counters, and all areas of entry and exit. This diagram must also show all receiving, storage, disposal, and retail sales areas. The General Manager shall update the diagram whenever Department approved changes are made.

28 Pa. Code § 1141.XX

Medical Marijuana Storage
Inside the company facilities, all medical marijuana shall be kept in a limited access area inaccessible to any persons other than dispensary agents. Inside the Dispensary, all marijuana shall be stored in a locked, access-controlled space in a limited access area during non-business hours. The General Manager is responsible for proper storage and access of all medical marijuana.

28 Pa. Code § 1161.33

Identification Badge Must Be Displayed
A dispensary agent shall visibly display an identification badge issued by the company at all times while at a Dispensary facility or transporting marijuana.

Facility and Personnel Hygiene

Dispensary Agents Subject To Food Handling Rules
An employee working in direct contact with medical marijuana is subject to the restrictions on food handlers in § 27.153 (relating to restrictions on food handlers).

28 Pa. Code § 1161.34(b)

Prohibited from Handling Marijuana
The general manager must not allow personnel to work in any product handling operation if they are sick or if they have open wounds, sores, or skin infections.

Prevention of Foodborne Cases of Viral Gastroenteritis
1. Food handling facility employees who test positive for Norwalk virus, Norwalk-like virus, norovirus, or any other calicivirus may not handle food or marijuana for either 72 hours past the resolution of symptoms or 72 hours past the date the positive specimen was provided, whichever occurs last.

2. In outbreak circumstances consistent with Norwalk virus, Norwalk-like virus or other calicivirus infection, affecting customers or dispensary agents, all employees may be required to provide stool specimens for testing.
Reporting To Local Health Department
The manager or supervisor of any Dispensary who knows or has reason to believe that an employee has contracted any disease transmissible through medical marijuana or food or has become a carrier of such disease, must report to the local board of health in the community in which the facility is located. If the local board of health is unavailable, contact the Department directly.

General Sanitary Practices
Any employee working in direct contact with preparation of medical marijuana must otherwise conform to the following sanitary practices while on duty:

1. Maintain adequate personal hygiene; and
2. 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 (i.e. after restroom breaks or handling cash).

28 Pa. Code § 1161.34(b)

Hand Washing Facilities
The company shall provide its employees and visitors with adequate and convenient hand-washing facilities furnished with running water at a temperature suitable for sanitizing hands. The following apply:

1. Hand-washing facilities must be located where good sanitary practices require employees to wash and sanitize their hands.
2. Effective nontoxic sanitizing cleansers and sanitary towel service or suitable hand drying devices shall be provided.
3. Instructive hand washing signs must be maintained in appropriate areas such as bathrooms and lunch areas, and in multiple languages as needed.

28 Pa. Code § 1161.34(c)

Hygiene Training Required
Employees are required to be trained in proper personal hygiene, with specific attention to preventing microbial contamination of handled medical marijuana (see Training).

General Manager Responsible for Hygiene Requirements
The General Manager must ensure hygiene policies are enforced including, but not limited to, personnel health and cleanliness, hand washing areas, and hand washing requirements.
Sanitation and Facility Maintenance

Sufficient Facilities Required

1. Floors, walls, and ceilings must be constructed in such a manner that they may be adequately kept clean and in good repair.
2. There must be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned.
3. Buildings, fixtures, and other physical facilities must be maintained in a sanitary condition.
4. Any Dispensary facility’s water supply must be sufficient for necessary operations. Any private water source must be capable of providing a safe, potable, and adequate supply of water to meet the operation’s needs.
5. Plumbing must be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the facility. Plumbing must properly convey sewage and liquid disposable waste from the facility. There must be no cross-connections between the potable and waste water lines.
6. Adequate, readily accessible lavatories that are maintained in a sanitary condition and in good repair must be available to employees and visitors.

28 Pa. Code § 1161.34

Facility Maintenance Required
The General Manager must ensure proper facility maintenance to ensure safe and sanitary conditions. Maintenance practices include:

1. Keeping work areas clean, dry, and free of algae and other clutter and trash. Remove trash from critical areas immediately.
2. All department managers must schedule and oversee regular cleaning and maintenance in their departments.
3. Maintain cracks, window and door frames, drain areas, and floor joints with sealant to limit pest movement.
4. Use appropriate traps and baits on a regular basis and replace as needed.
5. Maintain public access and parking lots of the dispensary so they are free of trash and debris that border, irrigate dirt roads to reduce dust and use slow speeds. Overhead irrigation will decrease dust and disrupt the behavior mite populations.
6. Eradicate any weeds or pest habitats surrounding all the company Dispensary facilities.
7. The General Manager must ensure that trees, bushes, and other foliage outside of the Dispensary facilities do not allow for a person or persons to conceal themselves from sight.
8. If the facility is bordered by grounds not under the company’s control, and if those other grounds are not maintained in the manner described in this section, care must be exercised in the facility by inspection, extermination, or other means to exclude pests, dirt, and filth or any other extraneous materials that may be a source of contamination.

28 Pa. Code § 1161.29; 1161.31; 1161.34
Sanitation Requirements

1. The General Manager must ensure all Dispensary facilities are maintained in sanitary conditions to ensure the safety of employees and medical marijuana products. Additionally, all necessary department specific requirements must be developed and enforced by department managers.

2. Department managers must maintain written procedures assigning responsibility for sanitation and describing in sufficient detail the cleaning schedules, methods, equipment, and materials to be used in cleaning the department facilities; such written procedures must be followed, and records of cleaning and sanitation must be kept in the Facility Maintenance Log.

3. Contractors must be informed of and held to the company sanitation standards while working on the company premises.

4. All the company employees are required to report unsanitary conditions in any the company Dispensary facility to their department manager.

5. UV sterilization door strips and dip tanks should be used in critical locations throughout the Dispensary facilities.

6. Frequent hand-washing is necessary in all handling activities and must be enforced by the department managers. Employees that do not comply with hand-washing requirements may be terminated.

7. All critical areas in the company Dispensary facilities must be clean and free of any contamination risks at the end of each shift.

8. Any mold found in the facility must be addressed by a mold removal expert immediately.

Plumbing

Plumbing, bathrooms, and hand-washing facilities must be compliant with local ordinance and codes and be properly maintained. All drain areas must be maintained so that they do not contribute to the contamination of any medical marijuana or contact surfaces by seepage, filth or any other extraneous materials, or by providing a breeding place for pests. Waste treatment and disposal systems must be maintained in good working order so that they do not constitute a source of contamination in any area.

Hand-washing Facilities Required

Hand-washing facilities must be adequate and convenient and must be furnished with running water at a suitable temperature. Hand-washing facilities must be located in the facility in production areas and where good sanitary practices require employees to wash and/or sanitize their hands, and must provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices.

Toilet Facilities

The facility must provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair. The General Manager must perform or oversee a daily walk through to ensure toilets, hot running water, toilet paper, disposable towels, and soap are available at the facility. Regular maintenance must be scheduled by the General Manager to ensure
toilet facilities are maintained in a clean and functioning condition to ensure that medical marijuana is protected from contamination due to personnel hygiene.

28 Pa. Code § 1161.34(d)

Pest Control Required
1. Facilities must be designed, managed, and monitored to keep out pests, including insects, rodents, and other animals.
2. Litter and waste must be properly removed and disposed of in order to minimize the development of odor, and minimize the potential for attracting and harboring pests. The procedures for waste disposal must be maintained in accordance with the company’s Inventory Management and Waste Disposal Plan. 28 Pa. Code § 1161.34(a)(3)
3. Pests must not be allowed to habitat in any area of the facility. Effective measures must be taken to exclude pests from the facilities and to protect against contamination of medical marijuana and contact surfaces.
4. Insecticides, fungicides, or rodenticides must not be used in or around any the company Dispensary facility, unless they are registered with EPA, used in accordance with the label instructions, and effective precautions are taken to protect employees in accordance with the company’s Safety Plan.
5. The General Manager must ensure there are written procedures for use of suitable rodenticides, insecticides, fungicides, fumigating agents, and cleaning and sanitizing agents. Such written procedures must be designed to prevent the contamination of medical marijuana, infused products, and contact surfaces. Such written procedures must be followed, and records of such use must be kept in the Facility Maintenance Log.
6. All storage areas must be maintained in a clean and orderly condition and free from infestation by insects, rodents, birds and pests. 28 Pa. Code § 1161.33
7. Adequate protection against pests shall be provided through the use of integrated pest management practices and techniques that identify and manage pest problems, and the regular disposal of trash to prevent infestation. 28 Pa. Code § 1161.34(a)(3)

Animals Prohibited
Animals are prohibited from any the company Dispensary facility, except that guard or service dogs may be allowed in some areas of the facility if no risk contamination of medical marijuana or contact surfaces exists.

Maintenance of Contact Surfaces, Utensils and Equipment
All contact surfaces, including utensils and equipment, must be maintained in a clean and sanitary condition. Such surfaces must be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the U.S. Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils must be so designed and of such material and workmanship as to be adequately cleanable, such as stainless steel, NSF or FDA approved contact parts.
Hazardous Materials
Cleaning compounds and sanitizing agents must be free from microorganisms of public health significance, approved by the EPA, and be safe and adequate under the conditions of use.

1. Toxic cleaning compounds, sanitizing agents, solvents and pesticide chemicals must 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.

Security Equipment Must Be Maintained
The General Manager is responsible for the maintenance of locks and security equipment to ensure good working order. All security equipment shall be in good working order and shall be inspected and tested at regular intervals, not to exceed 30 calendar days from the previous inspection and test.

General Manager Responsible for Overall Sanitation and Maintenance
The General Manager is responsible for maintaining sufficient order and cleanliness including the scheduling of cleaning and the maintenance, and the recording of maintenance in the Facility Maintenance Log.

Daily Walk-Throughs and Closing Procedures

Daily Walk-Through Required
The General Manager or designee must perform daily walk-throughs to ensure compliance with the company policies and procedures. Any area needing corrective action must be noted and an action plan developed and executed. The delegation of duties and the mandated expediency of such corrective actions shall be determined by the inspector in his or her best judgment. Areas of inspection include, but are not limited to:

1. Limited access areas secured;
2. Exterior lighting is operational;
3. The facility and all critical areas are sanitary and safe; and
4. Ensuring all security equipment is in good working order.

Frequency of Walk-Throughs
The walk-through should be performed at least one-time per day, preferably three times per day. The log record must be made after completion of the final walk-through each day.

Walk-Through Records
The General Manager is responsible for the daily completion of the Daily Walk-Through Log and the timely response to any issues uncovered by the walk-through.

**Daily Closing Procedures**
The General Manager or their appointed agent and at least one other employee must be responsible for daily closing procedures including:

1. Ensuring all medical marijuana is properly secured and stored;
2. Ensuring all security systems are functioning;
3. Ensuring all doors are secured;
4. Two dispensary agents are required for all opening and closing procedures; and
5. Ensuring all persons have left the building escorted by a security guard, as an additional security measure when needed.
# Exhibit: Facility Maintenance Log
*This form should be completed online.*

<table>
<thead>
<tr>
<th>Date:</th>
<th></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>List employees performing facility cleaning/maintenance:</th>
<th>List tasks performed:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>List rooms or areas inside the facility which were the focus of these activities:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Select all methods used for this facility maintenance:</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Wet (spray equipment, rinsing, washing, or scrubbing)</td>
</tr>
<tr>
<td>☐ Dry (wiping, vacuuming, sweeping, or blowing or compressed air)</td>
</tr>
<tr>
<td>☐ Chemical solution application</td>
</tr>
<tr>
<td>☐ General repairs</td>
</tr>
<tr>
<td>☐ Painting</td>
</tr>
<tr>
<td>☐ Other</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>List all cleaning solutions or other chemicals used during this facility maintenance operations:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Select methods for preventing exposure of product to cleaning solutions during these operations:</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Temporary relocation of plants/product</td>
</tr>
<tr>
<td>☐ Air purifiers/fans</td>
</tr>
<tr>
<td>☐ Plant containment cover</td>
</tr>
<tr>
<td>☐ Product storage-container cover</td>
</tr>
<tr>
<td>☐ Rinsing surfaces to remove cleaning solution residue</td>
</tr>
<tr>
<td>☐ Other</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Additional comments:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Employee Signature</th>
</tr>
</thead>
</table>

Submit
### Daily Walk Through Log

<table>
<thead>
<tr>
<th>COMPLIANCE ITEMS</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manager Name:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Was the alarm system armed upon arrival to the facility?</strong></td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td><strong>Is there any evidence of marijuana having been consumed on-site?</strong></td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td><strong>Is any marijuana or associated product visible to a person outside the facility?</strong></td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td><strong>Are all patients and inventory records being filled and stored in accordance with state and city law, as well as company policy?</strong></td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td><strong>Is all marijuana stored properly and securely inside a limited access areas?</strong></td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td><strong>Is all external signage in compliance with state, city, and building codes?</strong></td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td><strong>Is the security system on and working correctly?</strong></td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td>Manager Comments on Compliance Items</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PERSONNEL</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Is every person on-site properly identified with an identification badge or visitor's badge?</strong></td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td><strong>Is each person assigned to a job function properly trained for that duty?</strong></td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td><strong>Are workers informed on the current regulations?</strong></td>
<td>Yes</td>
<td>No</td>
<td>Other</td>
<td></td>
</tr>
<tr>
<td>Manager Comments on Personnel and Training</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
ENVIRONMENT

Does the facility appear to be in good hygienic condition? *

- Yes
- No
- Other

Is ventilation equipment working effectively?

- Yes
- No
- Other

Manager Comments on Environment

WORK PROCESS

Is the daily activity operating smoothly and effectively?

- Yes
- No
- Other

Are all tools and equipment used in the facility working correctly?

- Yes
- No
- Other

Manager Comments on Work Process

DESCRIBE ANY CORRECTIVE ACTIONS NEEDED

Manager Signature: *
**Issuance Authority**

Dispensary agent registration cards are issued by the Department in accordance with policies and procedures found in the . The general manager or department manager must issue a contractor badge. The general manager, a department manager, or their designee must issue a visitor badge and record the issuance in the Identification Badge Issuance Log.

**Visitor Policy**

**Visitor Restrictions**

Only registered patients, personal caregivers, dispensary agents, Department representatives, law enforcement and other officials acting in the course of their duties, and outside vendors, contractors, and visitors may access any Dispensary facility. Any unauthorized person must be denied access to any Dispensary facility. Contact law enforcement as necessary to remove individuals from the premises.

*28 Pa. Code § 1161.30(b)*

**No Unannounced Visitors**

It is the company policy to prohibit any unannounced visitors at any Dispensary facility. The exception to this rule covers all Department representatives and other designated officials that may conduct both announced and unannounced visits to the facility in accordance with the .

**General Manager Approval Required**

The General Manager will approve all visitors, except as noted above.

**Visitor Log and Identification Badge**

The General Manager or a department manager must approve by signature all visitors to any the company Dispensary facility. A dispensary agent may approve a visitor who is escorting a patient to the dispensary facility. The company shall require visitors, including vendors and contractors requiring access to a limited access area in the dispensary’s facility, to present government-issued identification, sign a visitor log and wear a visitor identification badge that is visible to others at all times while in the facility. The approving individual must log the visitor in and out on the Visitor Log, issue an identification badge, and record the issuance on the Identification Badge Issuance Log if the badge will be retained for over twenty-four hours.

*28 Pa. Code § 1161.30(c)*

The following apply regarding the visitor log:

1. The dispensary shall maintain the log 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; and
2. The log must include the full name of each visitor, the visitor identification badge number, the time of arrival, the time of departure and the purpose of the visit, including the areas visited and the name of each employee visited.
Identification Required
The visitor’s government-issued identification must be checked to verify that the name on the identification provided matches the name in the visitor log. A copy of identification (driver’s license, official badge, etc.) for each visitor must be obtained and kept with the Visitor Log. A visitor identification badge must be issued to a visitor and clearly displayed by the visitor prior to entering any limited access area. The visitor badge must be returned to the company upon exit.

Visitors Must Be Accompanied
All visitors must be accompanied by a manager, authorized employee or dispensary agent at all times in limited access areas and while onsite. The escorting employee must ensure that the visitor does not touch any medical marijuana located in a limited access area.

Restricted Access Areas
The General Manager oversees access to the safe room and medical marijuana storage, which must be restricted to key employees and controlled by biometric locks. Contractors and visitors requiring access must be escorted by the General Manager or their designee.

Department Authorized
Dispensary agents may allow Department representatives access to the facility at any time without prior authorization, but must record any such visit on the Visitor Log and notify the General Manager immediately upon their arrival.

Audit Schedule
The General Manager must perform quarterly audits to ensure compliance with this policy in accordance with the .

Prohibitions
A principal, financial backer, operator or an employee of the dispensary may not receive any type of consideration or compensation for allowing a visitor to enter a limited access area or the facility.

Dispensary Agent/Employee Badges

Employees of the Company
1. All employees must wear their Department issued registration card when entering limited access areas of any the company Dispensary facility.
2. The badge must be worn above the waist and be visible at all times to others while in the company facilities.
3. While performing work in other areas, employees are required to have their badges readily available. Display practices may be modified by the general manager for special work conditions.
4. Only the company issued badge display devices (lapel/pocket clips, armbands and lanyards) are allowed.

Temporary Badge
Any employee who forgets his or her registration card should immediately the department manager to obtain a temporary badge.

Identification of Badge Holders
Any person, including employees, not wearing the proper identification badge in a limited access area should be questioned by other employees and dispensary agents.

Limiting Access to Others
When entering any access-controlled area, employees must not allow entry of another person unless the individual displays a proper identification badge.

Reporting Of Non-Compliance Required
Non-compliance with these policies or any breach of the company security procedures should be reported immediately to the department manager or general manager.

No Offsite Display
Badges should not be worn off-site unless for official business.

Compliance Required
Violation of this policy may lead to disciplinary action, including possible termination.

Contractor Badges

Contractor Definition
A contractor is a vendor, supplier, professional service representative or consultant (contractor) who has business with the company.

Contractor Requirements
Contractors are required to sign in and receive an identification badge if they will be accessing limited access areas of any the company’s Dispensary facilities.

- Contractors who will be on the company facilities for only one day or less will be provided a Visitor Badge.
• Administrative assistants must be trained to issue visitor badges to contractors entering the company facilities.
• Contractors should be instructed to wear their badges properly while in limited access areas of the company.
• A dispensary agent must escort all contractors into and from limited access areas.

Long-term Contractor Badges
• At the request of a department manager, a contractor who will be on the company facilities for more than one day, or who will not be escorted by a dispensary agent will be issued a contractor identification badge by the general manager and recorded in Identification Badge Issuance Log.
• Contractors should be instructed to wear their badge while in limited access areas of any the company Dispensary facility.
• Contractor badges must be returned to the department manager at the end of each project.
• Department managers who authorize contractor badges are required to make arrangements prior to the work-start date. Pertinent information must be given to designated security badge providers.

Lost or Stolen Contractor Badges
Contractors who misplace, lose, or have a badge stolen must immediately notify appropriate department manager to receive a replacement badge.

Limiting Access to Others
Any contractor not wearing a badge in a limited access area should be questioned by employees and other dispensary agents.

Visitor Badges

Visitor Defined
A visitor is any individual who is conducting business with the company other than a qualified patient or their caregiver.

Visitor Badge Required
All visitors to any the company Dispensary facility are required to sign in and receive a visitor's badge if they will be accessing limited access areas of these facilities. Administrative assistants must be trained to issue visitor badges to visitors entering the company facilities. Visitors should be instructed to wear their badge properly while in limited access areas. Visitors may not wear their badge off-site.

Lost Visitor Badge
Visitors who lose their badges must immediately notify an employee.

Separation of Employment or Completion/Termination of Contractor Services
Upon separation of employment or completion/termination of contractor services, the company identification badges must be returned to a department manager immediately.
Inventory Management and Waste Disposal Plan

DOH REDACTED
Marketing and Advertising Plan

Marketing and Advertising Plan Summary
The company’s Marketing and Advertising Plan details how to use printed advertising to market health and wellness services and products offered at the company Dispensary facilities in compliance with state laws and regulations. It is established that the company will never use medical symbols, images of marijuana, related paraphernalia, and colloquial references to medical marijuana in their logo design pursuant to state law. Provisions are included to ensure the company will never produce any items for sale or promotional gifts bearing a reference to medical marijuana, including the logo of the Dispensary.

Comprehensive descriptions of printed materials and flyers, outreach and promotional materials, external signage and advertising practices are included. Plans for the use of printed materials to promote community integration events are addressed.

Company Logo
Any image used as a company logo must be approved by the board of directors. Any printed logo must be approved by the general manager to ensure appropriateness and consistency of use.

Prohibited Activities
All marketing and advertising efforts internal to patients and external to the general public shall be compliant with all regulations. The company prohibits the use of:

1. Any statement, design, representation, picture, or illustration that encourages or represents the use of marijuana for any purpose other than to treat a debilitating medical condition or related symptoms;
2. Any statement, design, representation, picture, or illustration that encourages or represents the recreational use of marijuana;
3. Any statement, design, representation, picture, or illustration related to the safety or efficacy of marijuana unless supported by substantial evidence or substantial clinical data with reasonable scientific rigor, which shall be made available upon the request of a registrant or the Department;
4. Any statement, design, representation, picture, or illustration portraying anyone under 18 years of age; and
5. May not advertise medical marijuana:
   a. As a promotional item.
   b. As part of a giveaway.
   c. As part of a coupon program.

28 Pa. Code § 1161.27

Printed Materials and Flyers
The company plans to use printed advertising to market health and wellness services offered at the company Dispensary facilities, as well as products available and the associated benefits. The company
will only pursue advertisement opportunities in alternative medicine, pain management, or similarly-focused industry publications to promote the company in a responsible manner to an intended audience of qualifying patients. The company will develop advertisements with a clear call to action while tracking effectiveness by including a unique offer or promotion code.

Educational materials provided by the company will include information describing proper dosage and titration for different methods of consumption. Information collected from registered testing facilities will also be provided to assist patients in learning about cannabinoids and their associated benefits. The company will describe the impact of potency and will emphasize in all recommendations that the smallest amount possible should be tested initially and increased conservatively until the desired effect is achieved. All educational materials provided at the company Dispensary facility will comply with state law.

**Online Marketing**
The company will provide a website with basic information to assist patients in contacting the Dispensary and with general information on medical marijuana and the law. Once established and verified as a qualified patient, the company will provide a patient and their caregiver with access to a secure web based ordering system that provides pricing, specific product information, and pre-ordering capability. All web orders will be confirmed by telephone and comply with all policies outlined in the Product Storage and Transportation Plan.

**Outreach and Promotional Materials**
The company will use printed materials to promote community integration events such as community garden events, bicycle and wheelchair repair events, and trash pick-up events as discussed in the company's Community Integration Plan. The company realizes that many qualifying patients are burdened with steep medical bills and it is important to ensure access to the medical marijuana strains or products that will benefit these patients the most. The company will develop a financial assistance program and outreach materials to provide information about the program as well as qualifications for indigent or low-income patients.

Pursuant to state law, the company will never produce any items for sale or promotional gifts, such as T-shirts or novelty items, bearing a symbol of or references to medical marijuana, including the logo of the Dispensary.

**External Signage**
External signage will only display the registered company name and address to assist qualifying patients in locating the business. Separate cultivation facilities will not display the company name associated with the dispensary facilities. A phone number and website may also be displayed to provide a resource for patients to obtain additional information about the company. The company will ensure that all medical marijuana, products, and associated products are not visible to a person from the exterior of the Dispensary facility and all external signage is in compliance with state regulations.
Advertising Practices
The company will engage in advertising practices that promote the company and the medical marijuana program in a respectful, educational, and medically-toned manner. The company realizes the potentially harmful effects of smoking and will emphasize alternative methods of consumption while offering and promoting a wide variety of vaporizing options to qualifying patients.

The company is committed to preventing diversion to minors and will add age safeguards on all websites and social media pages to deter under-age access. The company believes it is important to provide easy access to the company information, regulation updates, industry advancements, and community integration events for all qualifying patients. For this reason the company will maintain a blog to ensure easy access to this information for those who do not have a social media profile.

The company expects the highest volume of web traffic to be headed for the secure online menu because patients will often check menus for products they have experienced results with before visiting. The company will post an accurate and intuitive menu with helpful information about the products available such as cannabinoid profile, cannabis content, and nutritional information. The menu will be verified multiple times a day by an employee to reflect the current availability of all products. Pursuant to state regulations, the prices of medical marijuana and infused products will never be advertised on the public website, but will instead be available on the secure website or printed menus located inside the Dispensary facility for qualified patients and caregivers only.

Patient Education Plan

Patient Education Plan Summary
COMPANY's Patient Education Plan is a comprehensive patient education plan and includes an allotment of educational materials in compliance with Department regulations. It is established that educational materials will be provided for the Dispensary's registered qualifying patients and their personal caregivers, and that an adequate supply of up-to-date educational material will be maintained and made available for distribution.

Educational materials will be available in languages accessible to all patients served by the Dispensary, including for the visually- and hearing-impaired. All educational materials will be made available, upon request, for inspection by the Department.

Patient education materials will be provided and made to include, at a minimum, Department-required warnings pertaining to marijuana’s lack of FDA approval and potential health risks, driving and machinery operation prohibitions, information to assist in the selection of marijuana, materials for tracking strains used and their associated effects, information on dosage, potency and methods of administration with an emphasis on using the smallest amount possible to achieve desired effects; facts regarding substance abuse signs, symptoms and treatment programs; and a statement that patients may not distribute marijuana to any other individual. The patient education plan contained herein includes materials from the Americans for Safe Access Patient Resource Program.
Provisions for patient education events are addressed along with outlines for the Dispensary’s new patient guide, condition booklets and patient hotlines. A sample condition booklet and new patient guide are included.

**Educational Materials**

**Education materials required.**
A Dispensary shall provide educational materials about marijuana to registered qualifying patients and their personal caregivers. A Dispensary must have an adequate supply of up-to-date educational material available for distribution. Educational materials shall be available in languages accessible to all patients served by the Dispensary, including for the visually- and hearing-impaired. Such materials shall be made available for inspection by the Department upon request. The educational material must include at least the following:

1. A warning that marijuana has not been analyzed or approved by FDA, that there is limited information on side effects, that there may be health risks associated with using marijuana, and that it should be kept away from children;
2. A warning that when under the influence of marijuana, driving is prohibited by applicable laws and regulations, and machinery should not be operated;
3. Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration;
4. Materials offered to registered qualifying patients and their personal caregivers to enable them to track the strains used and their associated effects;
5. Information describing proper dosage and titration for different routes of administration. Emphasis shall be on using the smallest amount possible to achieve the desired effect. The impact of potency must also be explained;
6. A discussion of tolerance, dependence, and withdrawal;
7. Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs;
8. A statement that registered qualifying patients may not distribute marijuana to any other individual, and that they must return unused, excess, or contaminated product to the Dispensary from which they purchased the product, for disposal; and
9. Any other information required by the Department.

**Dispensary Manager Responsible For Patient Education Materials**
The dispensary manager shall provide and maintain patient education materials in accordance with Department regulations. All materials must be made available in languages accessible to all patients served by the Dispensary, including for the visually- and hearing-impaired. The dispensary manager may engage the services of a third-party for translation services. The dispensary manager may also utilize patient education materials with approval from general manager approved sources. Americans for Safe Access is an approved source.
Patient Education Events
The dispensary manager shall coordinate and schedule quarterly educational events for patients and caregivers. Events must cover one topic in-depth and may include:

1. Special materials distribution;
2. Lectures and guest speakers;
3. On-line content; and
4. Other approved forms of communication.

New Patient Guide
All new patient and caregivers visiting the company for the first time shall receive a new patient guide. The guide shall be updated semi-annually by the General Manager and only include information from credible sources. All materials used must be approved by the source.

Condition Booklets
The company will maintain a corporate sponsorship with Americans for Safe Access, the national patient information and advocacy non-profit group. Sponsorship provides the company preferred access to ASA’s services to Dispensaries in the Commonwealth. The sponsorship will provide the company with:

- Discounted publications for patient and caregivers including condition based booklets for Cancer, HIV/Aids, Arthritis, Chronic Pain, Movement Disorders, Gastrointestinal Disorders, Multiple Sclerosis, and Aging.
- Discounted training for company employees.
- Regular updates and advocacy opportunities.

Patient Hotline
The company shall record messages relating to the most common patient issues including dosing and over-consumption relief for playback availability off hours. These common responses must also be included on the company’s secure website. The company also provides an on-line chat feature during hours of operation where patients and caregivers with secured access may submit anonymous questions answered by a patient coordinator.

Patient Financial Hardship Plan
Financial Hardship Plan Summary
Although effective and safe, medical cannabis can be an expensive treatment option for patients. Medical cannabis is not allowed as a deductible healthcare expense for federal income tax purposes, nor is it covered by insurance. The company recognizes the burden this places on STATE patients and is committed to assisting those with a financial hardship.

Our financial assistance program is a sliding scale program which will provide support to the greatest number of patients possible based on income. Proof of assistance from another income based support
program will serve as sufficient evidence for enrollment in the company’s financial assistance program. This procedure does not require our staff to possess, review, or make judgments on the validity of private patient financial information. Should the patient submit financial data for consideration, the company will not retain copies of their personal information. The value of the monthly voucher amount awarded will be based on income level and sixty day supply limits determined by the recommending physician.

The program provides vouchers for purchases to program participants. Vouchers allow patients access to all forms of medical cannabis and does not limit them to a restricted selection of discounted product. The point of sale system is utilized to track the program including voucher amounts and expiration dates. The program budget and number of patients awarded access to the program will grow as the company grows. The company’s financial assistance program aims to assist as many patients as possible while maintaining sufficient assets to achieve financial stability and provide for growth. Additionally, funding for the program must be balanced with other community support initiatives and directed by the board of directors.

**Pennsylvania Profile**

**Program Management**

**Program Oversight**
The financial assistance program is overseen by the dispensary manager. The board of directors must authorize the program budget annually. The general manager shall authorize any operational program changes. The dispensary manager shall develop program documents and procedures to be approved by the general manager.

**Eligibility**
Financial assistance may be granted to residents of Pennsylvania who are properly registered with the Department. Participation is based on the patient’s income, not that of their caregiver. A patient does not need financial hardship status from the Department to qualify for COMPANY’s program. A patient must provide proof of receipt of assistance from an approved program or provided certified copies of their federal or state tax returns in order to qualify for assistance. The dispensary manager must grant final approval on any hardship application. The dispensary manager shall have the authority to grant financial assistance with general manager approval to a patient for reasons other than financial hardship including, but not limited to:

1. Active duty or veteran status;
2. Hospice status;
3. Disability status; or
4. Senior citizen status.
Approved Programs
A patient may provide an award letter (issued within the previous 12 months) from any of the following programs as proof of eligibility. Additionally, a patient may submit a certified copy of a federal or state income tax return for verification.

- Patients receiving the following aid or with certified tax return adjusted gross income between 201% and 300% of federal household poverty guidelines will qualify for the standard voucher level.
- Unemployment benefits (must be current – within one month)
- Workers compensation benefits (must be current – within one month)
- SNAP
- Medicaid
- Patients with income between 100% and 200% of federal household poverty guidelines will qualify for the plus voucher level.
- Patients with income under federal poverty guidelines will qualify for the maximum voucher level.

Current Voucher Awards
During initial operations, COMPANY will issue vouchers equivalent to [PERCENTAGE] of projected annual gross income. This is equal to the percentage of Pennsylvania households receiving food assistance benefits. Once the company has recouped expenses from the initial capital outlays or began to cover debt service obligations, the voucher program will increase to [PERCENTAGE] of the previous years’ gross income. The board of directors may adjust these levels based on the desired mix of community and patient support. Voucher levels are based on the assumption that most patients consume one and a half grams of medical cannabis per day (1.6 ounces per month). The maximum award provides patients at and below poverty the equivalent of 1.6 ounces per month at an average price of [DOLLAR AMOUNT] per gram. If a patient has need beyond the maximum award level, the general manager may approve a higher voucher award. Patients with physician recommendations lower than 10 ounces per sixty days or higher that 10 ounces per sixty days will receive adjusted voucher amounts.

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<th>Estimated Monthly Voucher Amount Awarded*</th>
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<tr>
<td>Sixty Day Supply</td>
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<td>&lt; 5 oz.</td>
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Terms
- The dispensary manager will approve or deny all applicants to the financial assistance program.
- The dispensary manager may award voucher status to patients temporarily due to unemployment or injury as approved by the general manager. Additionally, with general manager approval, the dispensary manager may award voucher status to veterans, senior citizens and, other patients on a case-by-case basis.
- Participation in the program is on a first come, first served basis.
- The dispensary manager shall maintain a waiting list of applicants to select new participants when program slots become available.
- Vouchers may only be used for medical marijuana products and vaporizers.
- Patients must provide new award letters upon the one-year anniversary of the award or provide tax returns every twelve months to maintain status in the program.

Recordkeeping
All patients participating in the program are required to sign an anti-diversion and responsible use pledge. Any patient suspected of diversion will be removed from the program immediately by the dispensary manager. The dispensary manager shall not retain any patient documentation used to verify financial status. All documentation shall be returned to the patient upon verification. Any documentation that is not returned to the applicant must be shredded. All financial documentation submitted for review shall be kept in a locked file cabinet in a secured area that is locked every evening after business hours.

Patient to Patient Assistance Program
COMPANY encourages a community environment for its patients. Patients who would like to assist low-income patients with access to medicine may sponsor a fellow patient. The voluntary program will accept patient and caregiver donations and apply them as voucher credit to patients who have been placed on the waiting list for the financial assistance program. Vouchers will be awarded monthly by the 25th day of the month based on the previous months’ donations.
DOH REDACTED
DISPENSARY OPERATING PLANS: INSTRUCTIONS

SEARCH AND REPLACE TERMS, if applicable

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<th>SEARCH</th>
<th>REPLACE</th>
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<td>Agent</td>
<td>Employee</td>
<td>NOTE: All plans currently utilize &quot;Agent&quot;</td>
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<tr>
<td>[COMPANY]</td>
<td>Legal Company Name</td>
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Safety and Sanitation

[COMPANY]’s safety policies detail procedures for ensuring the implementation of best safety practices following Occupational Safety and Health Administration (“OSHA”) guidelines in our facilities and operations. The systematic guidelines established will be strictly enforced, as the safety of agents and the public is the company’s foremost business consideration. All agents will comply with all applicable safety regulations as listed in the Standard Operating Procedures (“SOPs”) as a condition of employment. Company and agent responsibilities are addressed in the SOPs, and a designated Safety Officer is named as the primary contact for safety-related matters. Safety training will be provided as often as necessary and annually at a minimum.

Safety rules addressed include those relevant to accident and hazard reporting, drug and alcohol use, driving, work-related injuries and the required use of Personal Protective Equipment (“PPE”). Enforcement measures and disciplinary actions detailed are to be implemented in response to safety rule violations established herein. All emergency situations including chemical spill response will be handled by local emergency response agencies in accordance with the company’s emergency and incident response SOPs. Additional measures serve to establish procedures for injury claims and policies related to workers’ compensation and benefits provided.

Culture of Safety

It is the policy of the company that the safety of its agents and the public is the company’s foremost business consideration. The prevention of accidents and injuries takes precedence over expediency. In the conduct of the company’s business, every attempt will be made to prevent accidents from occurring. The company requires that its agents, as a condition of employment, comply with all applicable safety policies and procedures.

Senior management will be actively involved with agents in establishing and maintaining an effective safety program. The Chief Operating Officer, Safety Officer and other members of the management team will participate with all company agents in an ongoing safety program.

Company Responsibilities

The Chief Operating Officer in coordination with the General Manager will provide a safe workplace, facilitate monthly safety meetings, provide safety and health education and training with an annual review and update workplace safety rules.
**Agent Responsibilities**

Each agent is responsible for performing tasks safely and read all safety documentation related to their assigned tasks. If an agent is not properly trained in a function, they will notify their immediate manager. Not all work procedures can be addressed. The following items are examples of work conditions some departments, but are not all-inclusive:

1. Do not stand on furniture to reach high places, instead, always use a ladder or step stool;

2. Use handrails when ascending or descending stairs or ramps;

3. Close all drawers to cabinets after use to prevent tripping or bumping hazards;

4. Keep cords neatly banded to prevent tripping hazards;

5. Use extra caution when transporting glass to avoid breakage and cuts;

6. Keep floors clear of water by mopping during and after watering to avoid slips and falls;

7. Wear respirators when mixing and spraying chemicals;

8. Wear PPE when performing hazardous operations; and

9. Ensure all exhaust equipment and emergency shut-offs are operational before beginning work.

All agents of the company will report all unsafe conditions, immediately report all work-related injuries, wear the required personal protective equipment and abide by the organization’s safety rules at all times.

**General Manager Responsibilities**

The General Manager must identify and mitigate safety concerns. The General Manager, in coordination with the Chief Operating Officer, shall schedule regular infrastructure and equipment maintenance to
reduce fire risk and other potential hazards. Continual improvement of safety procedures will develop a culture of safety in the facility.

The General Manager must ensure and implement the company’s Safety SOPs and post and maintain an emergency contact list in the facility. All agents must be properly trained in Incident Response, in accordance with the Training Plan and Incident Response Plan. Contacts include:

1. General Manager;
2. Managers;
3. Fire response;
4. Law enforcement;
5. Poison control;
6. Ambulance; and
7. 911, which can also activate the Spill Response Team.

**Safety Officer Responsibilities**

It is the policy of the company to assign a Safety Officer to oversee all safety related matters and chair the company’s safety committee. The Chief Operating Officer will designate a Safety Officer for the company who will be the primary contact for safety-related matters.

All agents will receive an orientation of the safety policy and rules upon initial employment and are required to bring to the attention of the General Manager or the Safety Officer any unsafe or non-compliant conditions or practices. Managers will communicate these concerns to the Safety Officer, who will respond to reports within twenty-four hours. Safety training will be provided as often as necessary and annually at a minimum.
The Safety Officer is responsible for overseeing implementation of the organization’s safety program. The Safety Officer will:

1. Maintain compliance with Department regulations including current poster provisions and forms available to agents;

2. Annually review organization safety policy and rules;

3. Maintain accurate records and annually report the results of workplace accident and injury trend analysis;

4. Recommend actions to reduce the frequency and severity of accidents and illnesses;

5. Integrate safety into the day-to-day activities of all agents;

6. Coordinate the new agent orientation and safety training programs;

7. Assist the company in compliance with government standards concerning safety and health;

8. Assist the General Manager with accident investigation;

9. Conduct and record periodic safety inspections to identify unsafe conditions and practices and to determine remedies;

10. Ensure all agents are properly trained on hazardous conditions in their department and that all termination points for gas, electric and water service are clearly marked and known to agents; and

11. Make recommendations to the Chief Operating Officer on matters about safety.

Agent Reporting
All agents will receive an orientation to the company’s safety rules upon initial employment and will bring to the attention of the General Manager any unsafe conditions or practices. Managers will communicate these concerns to the Safety Officer, who will respond within twenty-four hours.
**Inspections Required**

All facilities will be inspected quarterly by the Safety Officer to identify potential hazards using the OSHA Self-Inspection Checklist to prevent hazardous material and chemical incidents that could result in injury and illness to any agent or visitor. A responsible party will be assigned to correct all hazards as soon as possible. If the hazard is deemed extreme, the Safety Officer will alert the General Manager, who may terminate operations until the issue has been corrected.

Also, it is established that requirements of OSHA's Hazard Communication standard will be met and the Safety Officer and General Manager are assigned responsibility for conducting job-specific hazard training on chemicals used by their agents. After attending training, each agent will sign a form to verify that he or she attended the training and understands the company's policies on hazard communication.

Copies of Safety Data Sheets ("SDS") for all hazardous chemicals to which agents may be exposed will be available on the intranet and by hard copy in each chemical storage area of the department in a designated SDS binder. Sample documents include accident report forms, a safety rule violation notice, and the OSHA Self-Inspection Checklist.

Per OSHA recommendations, inspections will cover:

1. Processing, Receiving, Shipping and Storage: Equipment, job planning, layout, heights, floor loads, the projection of materials, material handling and storage methods, training for material handling equipment.

2. Building and Grounds Conditions:
   Floors, walls, ceilings, exits, stairs, walkways, ramps, platforms, driveways, aisles. Housekeeping Program - waste disposal, tools, objects, materials, leakage and spillage, cleaning methods, schedules, work areas, remote areas, storage areas.

3. Electricity:
   Equipment, switches, breakers, fuses, switch-boxes, junctions, special fixtures, circuits, insulation, extensions, tools, motors, grounding, national electric code compliance. Lighting - type, intensity, controls, conditions, diffusion, location, glare and shadow control.
4. Heating and Ventilation:
Type, effectiveness, temperature, humidity, controls, natural and artificial ventilation and exhausting.

5. Machinery:
Points of operation, flywheels, gears, shafts, pulleys, key ways, belts, couplings, sprockets, chains, frames, controls, lighting for tools and equipment, brakes, exhausting, feeding, oiling, adjusting, maintenance, lockout/tag out, grounding, work space, location, purchasing standards.

6. Agents:
Training, including hazard identification training; experience; methods of checking machines before use; type of clothing; PPE; use of guards; tool storage; work practices; methods for cleaning, oiling or adjusting machinery.


8. Fire Prevention:
Extinguishers, alarms, sprinklers, smoking rules, exits, personnel assigned, separation of flammable materials and dangerous operations, explosion-proof fixtures in hazardous locations, waste disposal and training of personnel.

9. Maintenance:
Provide regular and preventive maintenance on all equipment used at the worksite, recording all work performed on the machinery and by training agents on the proper care and servicing of the equipment.

10. PPE: Type, size, maintenance, repair, age, storage, assignment of responsibility, purchasing methods, standards observed, training in care and use, rules of use, the method of assignment.

11. Transportation:
Motor vehicle safety, seat belts, vehicle maintenance, safe driver programs.

12. First Aid Program/Supplies:
Medical care facilities locations, posted emergency phone numbers, accessible first aid kits.

13. Evacuation Plan:
Establish and practice procedures for an emergency evacuation, e.g., fire, chemical/biological incidents, bomb threat; include escape procedures and routes, critical plant operations, agent accounting following an evacuation, rescue and medical duties and ways to report emergencies.
Safety Rules
These safety rules are designed to provide agents with knowledge of the recognized and established safe practices and procedures that apply to many of the work situations encountered while employed at this company. It would be impossible to cover every work situation. If any agent is in doubt about the safety of any condition, practice or procedure, they will consult their immediate manager for guidance. Any agent that willingly disregards a safety rule may be terminated.

Accident Reporting
All accidents or near misses will be reported to a department manager or the Safety Officer immediately. Falsification of company records, including employment applications, time records or safety documentation will not be tolerated.

Hazard Reporting
Agents will notify the General Manager or the Safety Officer immediately of any unsafe condition and practice.

Alcohol and Illegal Drugs
No illegal drugs or alcohol will be allowed on the worksite. Agents will notify the General Manager if they are taking any prescription drugs that might affect their work performance. The use of prescribed medication will be accommodated by the company to every extent possible.

Driving
While driving a company vehicle or driving a personal vehicle for company business, agents will obey traffic laws and signs at all times. Seat belt use is required, and agents will obey posted speed limits.

Lifting
When agents are required to lift a heavy item, they should always seek mechanical means (forklift, lift table, pallet jack, etc.) first. If an item is lifted manually, agents will refer to the detailed lifting safety rules before performing the task.

Falls
When working above a lower level (4 feet in general industry, 6 feet in construction) with unprotected sides, edges or openings, agents will protect themselves by use of guardrails or an approved personal fall-arrest system (e.g., lanyard, harness, anchor point).
**Personal Protective Equipment**

Appropriate Personal Protective Equipment (“PPE”) will be worn at all times during hazardous operations. If an agent has any questions or needs PPE, they will notify the General Manager and reference the PPE job hazard analysis. Agents are required to wear approved eye and face protection when sawing, grinding, drilling, using air tools or performing any other task that could generate flying debris. When working with chemicals, agents will wear the required protective eyewear. Gloves will be worn when handling metal, rough wood, fiberglass and other sharp objects. Hard hats will be provided when there are overhead hazards. Appropriate footwear, long-sleeved shirts, long pants, high-visibility vest, etc., should also be worn as required.

**Fire Safety**

All [COMPANY] facilities will comply with all local fire codes. Flammable materials will be stored in a fire cabinet properly labeled for first responder identification, and all areas of egress will be properly signed in. Fire extinguishers must be maintained annually, and all agents must be properly trained in fire prevention and mitigation measures.

**Hazardous Materials Policy**

**Policy**

The company is committed to the prevention of hazardous material and chemical incidents that could result in injury or illness to any agent. The company will spare no effort in providing a safe and healthy work environment for agents, and all levels of management will be accountable for the safety of those agents under their direction.

The Occupational Safety and Health Administration’s (“OSHA”) Hazard Communication standard (29 CFR 1910.1200) is based on the simple concept that agents have both a need and a “right to know” the identities and hazards of any chemicals they work with during their employment. Agents also need to know what protective measures are available to prevent chemical exposures and how to avoid adverse health effects.

**Contractors**

It is the General Manager’s responsibility to identify and obtain SDSs for chemicals any contractor brings into the company facilities. It is the responsibility of the General Manager to provide contractors with hazardous chemicals to which they may be exposed while working at the company and the procedure for obtaining SDS information, precautions contracted agents may take to reduce the possibility of
exposure by using appropriate protective measures and an explanation of the labeling system of the company.

Enforcement Policies

Procedures
All agents will be given a copy of the safety rules upon initial employment. All agents will sign and return the acknowledgment form after they have been given a chance to review the safety rules and ask any questions. The Safety Officer will periodically review the safety rules to ensure they are applicable and current.

Enforcement
Agents will be subject to disciplinary action for violations of safety rules. Department managers are responsible for the enforcement of safety rules. Agents will be afforded instructive counseling and training to assure a clear understanding of the infraction and the proper conduct under organizational guidelines. All training will be documented on a safety rule violation notice form and placed in the agent's personnel file. Nothing in this policy or this safety program will preclude management from terminating an agent for a safety violation. This is not a progressive discipline system, and any safety violation may lead to an agent's termination without prior instruction or warning.

Management reserves the right to impose disciplinary actions it deems appropriate. Verbal warning with documentation in the personnel file, written warning outlining nature of the offense and necessary corrective action with documentation in the personnel file then termination.

Management, including the General Manager, will be subject to the above disciplinary action for the following reasons:

1. Repeated safety rule violations by agents under their supervision;

2. Failure to provide adequate training before job assignment;

3. Failure to report accidents and provide medical attention to agents injured at work;

4. Failure to control unsafe conditions or work practices; or
Injury Claims Procedures
All agents will be provided with an explanation of the workers’ compensation system and the benefits it provides. In the event of a work-related injury or illness, the injured agent will report it to the General Manager or the Safety Officer before the end of the work shift. If the injured agent needs immediate medical attention, he or she will be driven or sent to the nearest hospital or clinic. If the injury is not an emergency, an appointment will be made with one of the worker’s compensation provider’s designated medical providers as soon as possible.

Once the General Manager has been notified of an injury, the department manager will provide a list of designated providers and written instructions to the injured agent. The agent will sign and date this written instruction. A copy will be maintained in their personnel file. An accident investigation will be conducted by the General Manager following all work-related injuries. The General Manager or Safety Officer will be responsible for interviewing the injured agent and all witnesses. The Safety Officer will report the claim to the worker’s compensation provider. If the incident involved an agent death or a catastrophe (three or more agents admitted to the hospital), the Chief Executive Officer will be notified immediately, and OSHA (1.800.321.6742) will be notified within eight hours. The Safety Officer will use information from the accident investigation to identify changes that may help prevent future incidents. For lost time claims, the General Manager will contact the injured agent at least once a week to answer questions, keep the injured agent informed of organization activities and discuss the return to work options. The Safety Officer will contact the medical provider after each appointment to keep current on the agent’s work status, medical progress and to ensure that appointments are being kept.

Modified duty procedures are appointed when necessary. The General Manager will determine if the agent can return to their regular job duties and will evaluate the medical restrictions. If the agent is unable to return to normal job duties, the General Manager will determine if the agent’s position can be temporarily modified to accommodate the restrictions. If the job cannot be modified, the Safety Officer will evaluate other tasks or positions the agent may be able to perform until the medical restrictions are lifted. If the agent is unable to return safely to a modified position, the medical restrictions will be re-evaluated after each doctor’s visit to ensure the agent is returned to work as soon as possible.
An entry will be made by the Safety Officer on an OSHA 300 Log for all cases involving medical treatment. (Employers with more than ten agents). Accurate records will be kept for all workers' compensation claims. This file will document all communications regarding the claim and all records from the medical providers and worker's compensation provider.

Limited Access Areas
Hygiene Policy

Agent Hygiene

Agents Subject to Food Handling Rules
All agents whose job includes contact with medical marijuana or medical marijuana products are trained in food handling requirements found in food safety law.

Prohibited from Handling Marijuana
Department managers must not allow agents to work in any product handling operation if they are sick, appear ill or if they have open wounds, sores or skin infections.

Prevention of Foodborne Cases of Viral Gastroenteritis
Food handling agents who test positive for Norwalk virus, Norwalk-like virus, norovirus or any other calicivirus may not handle food, medical marijuana or medical marijuana products for either 72 hours past the resolution of symptoms or 72 hours past the date the positive specimen was provided, whichever occurs last. In outbreak circumstances, consistent with Norwalk virus, Norwalk-like virus or
other calicivirus infection, affecting patients or agents, all agents may be required to provide stool specimens for testing.

**Reporting to Local Health Department**
Any General Manager or department manager who knows or has reason to believe that an agent has contracted any disease transmissible through medical marijuana, medical marijuana products, food or has become a carrier of such disease must report to the local health department and the regulatory Department immediately.

**Contact with Medical Marijuana or Medical Marijuana Products**
Any agent working in direct contact with the preparation of medical marijuana materials or marijuana products must maintain adequate personal cleanliness, including clean and appropriate work clothing, trimmed and clean fingernails (without polish or gloved) and wearing protective apparel as directed by the department Manager as necessary to protect medical marijuana and medical marijuana products from contamination. The agent must also wash hands thoroughly in an adequate hand-washing area before starting work and at any other time when hands may have become soiled or contaminated (i.e. after restroom breaks or handling cash).

**Hand-Washing Policies**
Instructive hand-washing signs must be maintained in appropriate areas such as bathrooms, kitchens and lunch areas – in multiple languages as needed. Each department Manager must enforce hand-washing policies.

**Hygiene Training Required**
Department Managers must ensure agents are trained in proper personal hygiene, with specific attention to preventing microbial contamination of handled medical marijuana or medical marijuana products.

**Sanitation Policy**
The Chief Operating Officer must ensure all facilities are maintained in sanitary conditions to ensure the safety of agents, patients, medical marijuana and medical marijuana products. Department Managers must maintain written procedures describing in sufficient detail the cleaning schedules, methods, equipment and materials to be used in cleaning the facilities. Written procedures must be followed, and records of cleaning and sanitation must be kept in the Facility Maintenance Schedule. Contractors must be informed of and held to sanitation standards while working on company premises.
All agents are required to report unsanitary conditions in a facility to their department Manager. Frequent hand-washing is necessary for all handling activities and must be enforced by the department Manager. Agents that do not comply with hand-washing requirements may be terminated. All critical areas in the company’s facilities must be clean and free of any contamination risks at the end of each shift. Any mold found in the facility must be addressed by a mold removal expert immediately.

**Maintenance of Contact Surfaces, Utensils, and Equipment**
Each department Manager in coordination with the Quality Assurance Manager must ensure:

1. Any substances required for equipment operation, such as lubricants or coolants, do not come in contact with components, product containers, medical marijuana or medical marijuana products so as to alter the safety, identity, strength, quality or purity of the medical marijuana or medical marijuana products beyond the official or other established requirements;

2. Equipment and utensils are designed and of such material and workmanship as to be adequately cleaned and maintained;

3. Equipment and utensils are cleaned, maintained and, as appropriate for the nature of the medical marijuana or medical marijuana products, sanitized using a sanitizing agent registered by the EPA, in accordance with labeled instructions and sterilized at appropriate intervals to prevent malfunctions or contamination that would alter the safety, identity, strength, quality or purity of the medical marijuana or medical marijuana products beyond the official or other established requirements.

4. Written procedures are established and followed for the cleaning and maintenance of equipment and utensils used to manufacture, process, package or hold medical marijuana or medical marijuana products. These procedures must include, without limitation:

   a. Assignment of responsibility for cleaning and maintaining equipment;

   b. Maintenance and cleaning schedules, including, where appropriate, sanitizing schedules;
c. A description in sufficient detail of the methods, equipment, and materials used in cleaning and maintenance operations and the methods of disassembling and reassembling equipment as necessary to assure proper cleaning and maintenance;

d. Protection of clean equipment from contamination before use; and

e. Inspection of equipment for cleanliness immediately before use.

5. Records of all equipment maintenance are maintained.

**Pest Control Required**
Facilities must be designed, managed and monitored to keep out pests, including insects, rodents, and other animals. Litter and waste must be properly removed and disposed of to minimize the development of odor and minimize the potential for attracting and harboring pests. SOPs for waste disposal must be followed. Pests must not be allowed to infest any area of the facility. Effective measures must be taken to exclude pests from the facilities and to protect against contamination of medical marijuana or medical marijuana products, and contact surfaces. Insecticides, fungicides or rodenticides must not be used in or around any company facility unless they are registered with the EPA, used in accordance with the label instructions and effective precautions are taken to protect agents in accordance with the company’s Safety Plan.

The General Manager of the facility must ensure there are written procedures for the use of suitable rodenticides, insecticides, fungicides, fumigating agents and cleaning and sanitizing agents. Such written procedures must be designed to prevent the contamination of medical marijuana or medical marijuana products, and contact surfaces. Such written procedures must be followed, and records of such use must be kept in the Facility Maintenance Schedule.

**Animals Prohibited**
Animals are prohibited from any company facility, except that service dogs in some areas of the facility if no risk of contamination of medical marijuana or medical marijuana products or contact surfaces exists.
Responsibility for Overall Sanitation and Maintenance
The Chief Operating Officer is responsible for maintaining sufficient order and cleanliness including the scheduling of cleaning and the maintenance and the accurate and timely recording of maintenance in the Facility Maintenance Schedule.

Daily Walk-Throughs and Closing Procedures

Daily Walk-Through Required
Department Managers or manager-designees must perform a daily walk-through to ensure compliance with [COMPANY] policies and procedures. Any area requiring corrective action must be noted, and an action plan developed and executed. The delegation of duties and the mandated expedience of such corrective actions shall be determined by the inspector in his or her best judgment. Areas of inspection include, but are not limited to, ensuring limited access areas are secured; exterior lighting is operational; the facility and all critical areas are sanitary and safe, and ensuring all security equipment is in good working order.

Frequency of Walk-Throughs
The walk-through should be performed at least one time per day, preferably three times per day. The Daily Walk-Through Log is filled in after completion of the final walk-through each day.

Walk-Through Records
Each department Manager is responsible for the daily completion of the Daily Walk-Through Log and the timely response to any issues uncovered by the walk-through.

Daily Closing Procedures
The department Manager or manager-designees and at least one other agent must be responsible for daily closing procedures including ensuring all medical marijuana or medical marijuana products are properly secured and stored, ensuring all security systems are functioning as well as ensuring all doors are secured.
Recordkeeping, Compliance and Audit Plan

[COMPANY] has adopted procedures for maintaining records that conform to the Department medical marijuana regulations and best practice for the medical marijuana and pharmaceutical sectors. [COMPANY] maintains a detailed description of plans, procedures and systems adopted and maintained for tracking, record keeping, record retention and surveillance systems, relating to all medical marijuana at every stage including cultivating, possession of medical marijuana, delivery, transporting, distributing, sale and dispensing by the proposed licensed organization. The company shall maintain records required for a period of five years and make these records available to the Department upon request.

[COMPANY] will ensure compliance with all laws and regulations pertaining to its operation as a licensed organization including recordkeeping. However, the operational needs of [COMPANY] require records in excess of the mandated requirements. [COMPANY]'s recordkeeping policies and procedures as detailed in this section and throughout the Standard Operating Procedures demonstrate not only compliance with legal and regulatory requirements but a commitment to full documentation and transparency in all of [COMPANY]'s operations.

[COMPANY] maintains strict control over records to provide operating data to management, information to advisors and board members, document operations for third-party certifiers or auditors and to keep a record of operations in case of any insurance claims, legal or administrative investigation.

The Chief Operating Officer shall oversee all record retention protocols of the company. The Chief Executive Officer is responsible for oversight of the Chief Operating Officer and all record maintenance activities. The General Manager must supervise the recordkeeping activities in their operating department to ensure compliance with company policies and procedures.

Compliance With Regulations

[COMPANY] is committed to compliance with all laws and regulations about its operation as a registered organization. Management will make all records available to the Department or its authorized representatives upon request for monitoring, on-site inspection and audit purposes. Several regulations apply to recordkeeping functions. Our recordkeeping policies and procedures demonstrate not only compliance with the State of Pennsylvania requirements but also a commitment to full and transparent documentation of our operations.

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Requirements

The Chief Operating Officer is responsible for recordkeeping, data retention and back-ups to ensure [COMPANY] maintains true, complete and accurate records and in accordance with the Department regulations. The Chief Operating Officer is also responsible for the proper integration of those requirements into policies and procedures. [COMPANY] will submit required Department reports on forms prescribed by the Department, at the end of the first 12-month period following the issuance of a permit, and as of the end of each 3-month period thereafter. Back-ups of all records must be maintained for a recommended five years.

All agents must adhere to recordkeeping policies and procedures unique to their department as a condition of employment. The Chief Operating Officer must authorize the release of any records to a
third-party and must report the disclosure of records to the Chief Executive Officer to determine if legal
counsel should be notified.

[COMPANY] shall maintain, at a minimum, the following categories of records:

1. Standard operating procedures;
2. Inventory records including the electronic tracking system;
3. Confidential patient;
4. [INVENTORY SYSTEM] patient profiles;
5. Dispensing history;
6. All dispensed medical marijuana, medical marijuana products and periods of no-fill (zero report);
7. Dispensing errors;
8. Allergy and adverse event reporting; and
9. Medical marijuana and medical marijuana product recalls.

Additional record requirements include:

1. Agent records and policies;
2. Waste disposal records;
3. Maintenance records;
4. Company’s assets and liabilities;
5. Fixed asset schedules;

6. Insurance and escrow requirements;

7. All monetary transactions;

8. Books of accounts including journals, ledgers and supporting documents, agreements, checks, invoices, vouchers, monthly and quarterly reports and annual audits;

9. Sales records;

10. Medical marijuana purchased and pricing records;

11. Salary and wages paid to each agent;

12. Stipend paid to each executive manager and any executive compensation, bonus, benefit or item of value paid to any individual affiliated with [COMPANY], including agents of [COMPANY], if any; and

13. All licensing documentation and other correspondence with the Department and all other corporate documents required by law including but not limited to meeting minutes, annual reports, stock or membership agreements.

**Policies**

[COMPANY] has developed strict protocols for the maintenance of records and documents. In addition to [COMPANY]’s legal obligation to protect patient information, we have a responsibility to our stakeholders to accurately document the activities of the business. True and correct records maintained in a timely and organized manner also provides real-time operating information to management necessary to make quick and informed decisions in the normal course of business.

**Recordkeeping Systems**

[COMPANY] will acquire multiple information from [INVENTORY SYSTEM] requiring hardware and software. Whenever possible, the company will elect cloud based software system that allow the use of standard hardware and that provide sufficient back-up capabilities. [COMPANY] will utilize the electronic tracking system designated by the State and their recommended hardware, data storage and software for all operating functions so long as they retain the contract to provide services to the Department. The Chief Operating Officer may fulfill additional organizational hardware and software needs.

Hardware configurations are reviewed with each software application in order to determine what
equipment will best meet the needs of the agents. The company makes every effort to provide the most suitable desktop or laptop while maintaining company cost effectiveness. Agents will be given access to appropriate network printers. Agents needing computer hardware beyond that which is typically provided must request such hardware from the General Manager. In some limited cases, agents may be given local printers if deemed necessary by the General Manager in consultation with the Chief Operating Officer.

All software acquired or developed by [COMPANY] is and at all times shall remain company property and must be serviced by a real-time offsite backup system. All such software must be used in compliance with applicable licenses, notices, contracts and agreements. All purchasing of company software shall be centralized by the Chief Operating Officer to ensure that all applications conform to regulatory and company software standards and are purchased at the best possible price. All requests for software must be submitted to the General Manager for approval.

Agent Records
The Chief Operating Officer or designee must maintain accurate agent records for each agent. Such records must be maintained for a recommended five years and include:

1. All materials submitted to the Department;
2. A copy of their Department issued registration;
3. Documentation of verification of references;
4. The job description or employment contract that includes a description of duties, authority, responsibilities, qualifications and supervision;
5. Documentation of all training received by the agent and the signed statement of the agent indicating the date, time and place the training was received and the topics discussed, including:
   6. The name and title of trainers; and
   7. Documentation of periodic performance evaluations and a record of any disciplinary action taken.

Compensation Records
The Chief Operating Officer or designee must maintain records documenting the salary and wages paid to each agent, the stipend paid to each executive manager and any executive compensation, bonus,
benefit or item of value paid to any individual affiliated with [COMPANY], including executive managers. These confidential records must be maintained for a recommended period of at least seven years or longer if required by law.

**Inventory Records**
The Dispensary Manager shall oversee daily paper and electronic entry of all inventory transactions. Each day, the designated agent responsible for opening the facility will record beginning inventory. Ending inventory for each shift will also be logged. Each facility will maintain an inventory log to record the date of each inventory process, a summary of the inventory findings and the names, identification numbers, signatures and positions or titles of the individuals who conducted the inventory. All inventory data will be stored and accessible in [INVENTORY SYSTEM] in addition to the Department electronic tracking system.

**Cycle Counts Required**

**Dispensary**
- **Shift counts:**
  - Sales
  - Medical marijuana and medical marijuana products on the sales floor
  - Cash in drawer
- **Daily counts:**
  - Medical marijuana and medical marijuana products secured in sales area
  - Daily sales
  - Daily receipts
- **Weekly counts:**
  - Medical marijuana and medical marijuana products in secured storage
  - Weekly sales and receipts totals
- **Monthly counts:**
  - Two agent count of all inventory – medical marijuana, medical marijuana products and non-medical marijuana devices
  - Department Manager reconciliation to [INVENTORY SYSTEM]
  - Administrative reconciliation of all sales and receipts
- **Quarterly counts:**
  - Department Manager physical count of all inventory
  - Chief Executive Officer review of all discrepancies and reports
- **Annual counts:**
  - Complete inventory of all inventory and assets
**Lot and Container Records**

Each General Manager, under the oversight of the Chief Operating Officer, must ensure that each container or group of containers for components, medical marijuana and medical marijuana product is identified with a distinctive code for each lot in the shipment received. The code must be used in all transactions pertaining to the lot including processing, sales, transfers, disposals or any other transaction impacting quantities recorded for the lot. Each lot must be properly identified by the General Manager both with container labeling and in [INVENTORY SYSTEM] as to the lot’s status as quarantined, approved or rejected.

**Dispensary Records**

**Pricing Records**

The Department or an authorized representative may have the right to examine records that formed the basis for the proposed price, including [COMPANY]’s books, records, documents and other types of factual information that will permit an adequate evaluation of the proposed price. The company shall provide access to the Department of its facilities, books and records.

**Patient Records**

The Dispensary Manager must ensure that a patient’s record is only accessed by an agent authorized by the policies and procedures of [COMPANY] to access the patient record, and is protected from loss, damage or unauthorized use, and is maintained for at least the recommended five years or as the Department regulations require after the date on which the patient last utilized dispensary services.

It is [COMPANY] policy to maintain patient records electronically in a system approved by the General Manager. The Dispensary Manager must ensure that there are safeguards to prevent unauthorized access and that the date and time of an entry in a patient record are recorded electronically by an automatically synchronized internal clock.

**Internal Laboratory Reports**

Each agent must ensure that no laboratory record presented by [COMPANY] is falsified in any manner. Any agent who knowingly falsifies a laboratory report will be terminated immediately. Any agent who suspects that a laboratory record may have been falsified must report to the Chief Operating Officer and Quality Assurance Manager immediately as a condition of employment.

The internal laboratory is required to maintain records for the following QA/QC/laboratory activities including sample receiving, tracking, storage and disposal; sample preparation, analysis and documentation; standards preparation, documentation, handling and storage; standards and chemical
receiving, tracking, storage and disposal; instrument and equipment operation and maintenance; data collection, handling, reporting and storage; records pertinent to the quality of analytical data reported.; analyst training records; monthly and yearly safety inspections and emergency responses.
Records Loss
Any loss or unauthorized alteration of company records discovered or suspected by any agent must be reported to the Chief Operating Officer immediately. The Chief Operating Officer must report such incidents to the Department and law enforcement as necessary. Upon discovery of a records security breach, the Chief Operating Officer must review all recordkeeping and security policies to identify deficiencies and necessary corrective measures. The Chief Operating Officer must engage the service of a third-party data security expert as needed.

Incident Reporting
Incident reporting must be documented by the department Manager and reported immediately to the Chief Operating Officer or the Security Officer, in accordance with company reporting and notifications policies and procedures. Anyone with knowledge or a reasonable suspicion of an incident is instructed to make an immediate report to the department Manager and record the Incident in the Incident Log. All incident activities, from receipt of the initial report through post-incident review, are to be documented. The Security Officer is responsible for ensuring all events are recorded, assembling these records in preparation and performance of the post-incident review and ensuring all records are preserved for review.

Reporting of Records Incidents
Any loss or unauthorized alteration of records at the dispensary related to medical marijuana, patients or agents will be reported to the Chief Operating Officer or Security Officer immediately. The Security Officer will report any such incident to the Chief Operating Officer, law enforcement and the Department.
Closure Or Temporary Shut-Down
In the event of closure, [COMPANY] proposed to the Department the procedures and actions the registered organization shall take to maintain and make available to the Department all records required to be maintained under this part for a recommended period of five years.

Termination of Operations Notification
If any department of [COMPANY] that requires licensing with the Department is closing for any reason, the Chief Executive Officer must ensure that the Department is notified in accordance with regulations. In the case of an emergency that requires a temporary cessation of operations, the company will immediately notify the Department for further direction and instruction on the appropriate procedures to undertake.

All activities must be appropriately documented and recorded by the General Manager during any period of temporary or permanent closure. The Chief Executive Officer is responsible for the oversight of any temporary or permanent closure activities.
**Records Maintenance**

All electronic company records are recommended to be maintained for a minimum of five years, or as otherwise prescribed by Department regulations. It is Company policy to retain records in perpetuity unless a member of senior management determines the electronic record should be deleted or destroyed. The Quality Assurance Manager shall determine the need to destroy paper records.

**Electronic Records**

[COMPANY] shall maintain all company records in an electronic format. A cloud based backup system will provide a second location for a duplicate copy of all records. Independent laboratory records shall be maintained in [INVENTORY SYSTEM] and attached to the batch for which the report was issued.

**Paper Records**

Quality control agent records may contain paper documents including training documentation forms. All human resources records will be maintained by administrative management and securely stored in accordance with all employment laws.
Human Resources Staffing and Training

[COMPANY] Staffing and Training policies dictate the processes the company will use to manage human resources to provide the highest quality service and products for patients while acting in compliance with Department regulations. The Chief Operating Officer in coordination with the Human Resources Manager is responsible for maintaining and updating the policies, which will ensure that [COMPANY] has sufficient staff possessing the correct skill-sets and experience needed to ensure the success of all operations. [COMPANY] encourages personal growth, development, and empowerment for its agents. All agents are encouraged to provide input and suggest new policies and processes.

Fair Employment Practices Policy

[COMPANY] is committed to providing all agents with a safe, healthy and beneficial working environment. Workplace safety and environmental standards are of utmost concern to [COMPANY] as the welfare of our agents greatly impacts our ability to operate successfully. Fair employment practices, including the prohibition against all forms of illegal discrimination, will be prioritized and enforced at all times through company codes of conduct. All agents will receive access to generous benefits packages and rates of compensation that exceed state minimum standards. By providing equal access and fair treatment to all agents we will improve [COMPANY]'s success while enhancing the progress of individuals and the community in which our business operates.

Compensation Standards and Time Off

The standard company work week consists of 40 hours. Overtime compensation is paid to non-exempt agents in accordance with federal and state wage laws. Overtime is payable for all hours worked over 40 per week at a rate of one and one-half times the non-exempt agent's regular hourly rate.

Each agent’s hourly wage or annual salary will be reviewed at least once each year. When [COMPANY] has the financial ability to provide them, increases will be determined by performance, adherence to laws, policies and procedures and the ability of agents to meet or exceed duties per job description and achieve performance goals. [COMPANY] will provide all agents with competitive wages based on position and tenure. Our standard wages range from $12 per hour to $75k annually. Bonuses are variable, generally never exceeding 5% of an individual’s total yearly salary. Additionally, all bonuses are at the discretion of the Chief Operating Officer and not guaranteed. By providing our agents with adequate compensation, we reinforce our commitment to investing in the progress of individuals and the establishment of a highly capable and experienced team. It is a goal of [COMPANY] to establish long-term employment opportunities for all agents.
[COMPANY] will offer its regular full-time agents paid vacation after one year of employment, two weeks after three years and four weeks after five years of service. Additionally, the company will provide unpaid leave opportunities for all agents to care for the agent’s child after birth or placement for adoption or foster care, to care for the agent’s spouse, son, daughter or parent, who has a serious health condition, for a serious health condition that makes the agent unable to perform the agent’s job and for a qualifying exigency or military caregiver leave.

**Benefits**

[COMPANY] is committed to providing a generous benefits program for all agents as allowed by the company’s financial performance. When fiscally feasible, all company agents will have the opportunity to participate in a 401(k) plans and other types of retirement programs with a matching company contribution. Agents will also be presented with access to competitive health insurance programs or a health savings account (HSA) program covering individuals and families. 125 Flexible Spending Accounts will be established for participating agents, allowing participants to set aside pre-tax dollars to pay for certain types of health expenses. [COMPANY] will establish access to three plans: (1) for medical expenses, (2) for dependent care expenses and (3) for certain transportation expenses. [COMPANY] will additionally provide agents with options for participating in long-term and short-term dental and vision coverage, disability insurance and life insurance programs or provide equivalent salary allowances.

Our community involvement directives allow agents to earn wages while participating in community-based initiatives such as volunteer work, participation in local Big Brother/Big Sister programs, Junior Achievement or other community-based service programs. Additionally, [COMPANY] may establish tuition reimbursement programs for agents to reimburse for programs that benefit agent advancement.

**Staffing Plan**

The hiring of agents must follow established procedure. The Human Resources Manager will ensure compliance with local, state and federal laws regarding the hiring and employment screening processes. [COMPANY] retains legal counsel to ensure our employment policies comply with local state and federal employment laws.

**Staff Acquisition Process**

1. Identification of need;
2. Job classification and job description preparation;

3. Solicitation of the vacant position utilizing the methods that best fit the position;

4. Reviewing resumes of qualified candidate;

5. Performing and recording reference checks on qualified candidates;

6. Scheduling first interviews with the Human Resources Manager;

7. Scheduling second interviews with a strong candidate with the Human Resources Manager and department Manager;

8. Delivery of an offer letter to the first choice candidate;

9. Performing criminal background check on selected candidate;

10. Send application to the state for registration; and

11. Completion of the probationary period.

The staffing plan is based on business plan assumptions and best practices and may be adjusted by in accordance with actual operating needs. [COMPANY]’s Human Resource Manager will coordinate with the General Manager to acquire all staff. The acquisition process may vary depending on the vacant position and special circumstances. The acquisition process will be managed by the Human Resource Manager and will always include performing a criminal background check on the selected candidate to determine eligibility for Department of Public Health registration; application to Department of Public
Health for registration, new hire orientation and training only upon successful registration and completion of the probationary period.

All Managers must comply with all EEOC guidelines. None of [COMPANY]'s policies or practices discriminate or conflict with laws regarding the following: race; height and weight; credit rating or economic status; religious affiliation or beliefs; citizenship; marital status and number of children; gender; arrest and conviction; background checks for certain religious or ethnic groups; disability; medical questions and examinations.

Positions will only be filled according to the established protocols.

**Applicant Screening and Monitoring**
It is critical for the security of [COMPANY] that only the most qualified, credible and talented people are hired to help avoid workplace theft, fraud or violence. It’s equally important for [COMPANY] to conduct background screening on the contingent workers, including cleaning crews, facilities maintenance workers, auditors and other contractors who have access to company’s property or represent [COMPANY]. Knowing the background of these workers is required to protect the integrity of [COMPANY] as well as the safety of patients. Therefore, this workforce needs to be screened with the same due diligence as any other agent.

To help attract, hire, land and retain the best agents [COMPANY] has developed employment screening and monitoring processes to create a candidate experience that benefits potential agents and reduce [COMPANY] risk by utilizing a fast, scalable and compliant background screening solution. An efficient, thorough employment screening process can, above all else, help reduce the company's overall workplace risk. Identifying risk early, before hiring an agent, protects the organization from risk related to physical safety, financial security organizational image or reputation, and legal compliance issues.

**Pre-screening Potential Candidates**
The Human Resources Manager will pre-screen candidates by stating clearly to potential applicants what items and prerequisites will be needed to properly qualify the employment application using the methods found here:

*Employment Screening Best Practices Suggested Preparation,*
https://www.aba.com/Products/Endorsed/Documents/First-Advantage-Screening-Best-P (accessed February 05, 2017). This will streamline [COMPANY]'s application process by having applicants review the information and then determine whether or not they meet the qualifications. This is part of the
proactive pre-screening process that ensures applicants who submit their information will pre-qualify based on the specific information needed later in the process.

Any applicant who has submitted a complete application for employment will have a professional background check conducted. This investigation will be in addition to verification that the potential agent is or will soon be licensed as a medical marijuana agent and thus allowed to work in the facility. The investigation will be conducted to ensure the potential agent does not have any felony convictions, which would bar them from employment. The investigation will also check for any crimes of moral turpitude, whether misdemeanor or felony. Any indication of past crimes of moral turpitude will be a bar to employment.

The following searches may be performed depending upon the type of position the candidate is seeking.

1. Member-Contributory Theft Information Database

[COMPANY] will use a member-based program where companies share agent theft and shoplifting information to identify applicants with a history of internal theft. The database is built from member contributions and would be available exclusively to member organizations. Member contributions are typically proprietary records and not found through traditional public record sources.

2. National Crime File Search

Some vendors can offer access to a nationwide database of criminal records gathered from across all 50 states. A variety of sources are utilized including Sex Offender Registries, state and county criminal courts and state-level departments of corrections. This search can provide instant results depending on the provider.

3. Felony and Misdemeanor Search

This county courthouse search includes a search of all felonies and misdemeanors on all indexes available at the main county seat court location.

A Motor Vehicle Report (MVR) reveals the status of an applicant’s driver’s license and any violation history. This search should be conducted on all candidates who will have driving responsibilities, including those who will not only drive a company vehicle but may also drive a personal vehicle on company time or for business purposes.

**Verification and Qualification Solutions**

The Human Resources Manager will utilize the following solutions depending on the level of security required for the position.

1. **Social Security Number Verification (SSNV)**

   This search matches the input information against millions of consumer header credit files contained in the databases of nationwide credit reporting agencies. The SSNV returns other names and addresses associated with the identifying information used to request the report.

2. **Credit Check**

   This search matches the candidate’s information to information held by the Credit Bureaus and returns the candidate’s credit report.

3. **Employment and Education Verification**

   [COMPANY] will integrate instant and automated employment screening products into the hiring process. Instant searches will be used to efficiently move forward in the hiring process by quickly confirming or validating basic information such as a social security number or name and address history. Automated searches will provide electronic delivery of process updates and results, eliminating time delays often associated with manual follow-up on important screening components such as employment or education verifications. Once the applicant is determined to have passed a background check, a first interview will be initiated.

**Adjudication and Alerts**

[COMPANY] will provide a criminal records adjudication policy as part of the screening process. FCRA-mandated Adverse Action letters for candidates that fail to meet specific screening criteria set forth by the organization will be delivered to candidates.
Drug Screening

[COMPANY] will utilize a drug testing service provider who will track results, provide reports and ensure the company stays in compliance with the Department regulations. The Human Resources Manager will develop and update drug-testing policies. A basic DOT Five Panel Drug Test (urine conventional) will be used. Medical marijuana use by a qualified patient is not a disqualification for employment. The following drugs will be tested from the applicant’s urine sample: amphetamines (amphetamine and methamphetamine), benzoylecgonine (cocaine metabolite), cannabinoids (marijuana metabolite and THC-COOH), opiates (codeine and morphine) and phencyclidine (PCP).

The Human Resources Manager will cause all required criminal and drug screens to be updated every two years. All agents are required to notify [COMPANY] whenever they have any encounter with law enforcement. The Human Resources Manager will determine if an additional background screening should be performed upon the agent’s notice. A post-accident drug screening may be performed at the Human Resources Manager’s discretion or if required for worker’s compensation purposes.

1st Interview

The first interview will consist of a face-to-face meeting with the Manager of the department the applicant is interviewing for a position in. No more than five applicants will be selected for a first interview. The purpose of this interview will be to help determine:

1. Level of knowledge regarding medical marijuana operations;

2. Existing skill set relevant to the duties of the job offered;

3. Their capacity to learn new skills and grasp concepts (specifically regulatory concepts); and

4. Potential to commit theft or fraud.
At least two references will be contacted and details of the interview confirmed. A solid background (or an appropriate level of education/experience relating to the position offered), a clean record and indicia of honesty will be requisites for the second interview.

**Final Interview**

The final interview will be conducted by the General Manager. No more than three candidates will be selected for the final interview. The General Manager will ask a variety of questions intended to assess the applicant’s ability to interact with others and work according to company’s policies. The final decision will be made by the General Manager with input from the department Manager who conducted the first interview and the Assistant General Manager. For management positions, the General Manager and will jointly conduct the final interview with the department Manager retaining the final decision after consulting with managing members. All potential agents must go through the entire process.

Each new hire will begin work on a three month trial period of employment. At the end of the three months, their department manager will conduct an assessment of the agent’s performance.

**Training**

All new hires will be required to go through a training period. Potential agents will be advised of all employment policies, as well as the proper procedures to employ while performing their duties. Educational training will consist of presentations given by the General Manager and department Managers. The presentations will be supplemented with hands-on training to demonstrate the material included in the presentations. All agents will go through additional training with their department Manager based on the employment role.

Being in an industry that is constantly changing requires companies to be aware of recent market developments and trends throughout the industry. [COMPANY] takes a proactive approach to continually providing progressive training and interactive learning to our agents. This is conducted both at the individual facilities by certified trainers, and also electronically and telephonically when necessary. By exposing agents to constant training and developments, [COMPANY] values its agents and aims for high retention rates.

Training allows agents to learn required processes and procedures to take on additional responsibilities throughout the course of their employment with the company. The opportunity for advancement encourages the retention of our agents.

Our collaborative training program is designed to educate agents on best practices for maintaining their
personal safety and the safety of company’s products, including comprehensive emergency and incident management training. Training sessions may include virtual web collaborations, on-site training in existing operations, Patient Focused Certification training and OSHA Occupational Safety Training.

**Agent Training**

No agent or consultant may work on-site before receiving orientation training or when any required critical training is four weeks or more past due. The Human Resources Manager will ensure each agent is provided all relevant and adequate training. Training will be tailored to the roles and responsibilities of the job function of each agent and at a minimum must include training on confidentiality, security controls, emergency response protocols and Department regulations as well as federal statutes regarding the use of medical marijuana. Each agent will receive a minimum of eight hours of ongoing training annually or as deemed necessary by the Chief Operating Officer.

**Module Based Training**

[COMPANY] employs a strategy of module based training. Each module will cover a single topic in-depth. Training modules include:

1. New agent orientation;

2. Train the trainer;

3. Monthly department meetings;

4. Compliance, regulation, and law;

5. Confidentiality;

6. Safety;

7. Security;
8. Emergency and incident management;

9. Inventory management and diversion prevention;

10. Medical Marijuana Science;

11. Community and customer relations;

12. Recordkeeping;

13. Product handling and sanitation; and

14. Transportation.

[COMPANY] may develop and implement new modules as deemed necessary. General agent training will largely be department focused and relevant to the operational processes each agent will follow on a daily basis. The Human Resources Manager will reassess all modules annually to determine if updated training is necessary to maintain a compliant operation.

**Evaluation**

To achieve high standards of quality, efficiency, and compliance, the Human Resources Manager shall evaluate the training program annually. Based on the results of this evaluation, the General Manager will implement any necessary changes and determine the need for re-training of staff. The Chief Operating Officer must approve any major training program changes. The Human Resources Manager will solicit and record feedback on the quality and efficacy of a training module from agents that received the training. Feedback may be solicited utilizing post-training group discussions, individual interviews, and anonymous surveys.
Agent Manual (Employee Manual)
Upon licensing and commencement of operations, all agents will undergo a mandatory training period. During the first day of training, an employment manual will be issued to agents. The manual will set forth [COMPANY]’s policy regarding administrative matters, including terms of employment, what is expected of agents and procedures for discipline. Each agent must read through the manual and sign a contract acknowledging they have received, read and understand the company’s policies.

SOPs
The second stage of training focuses on medical marijuana operations and procedures. Training includes a background of commercial medical marijuana, identification relevant laws, a break down of the company structure, the roles of agents and the Standard Operating Procedures for each phase of operation. Medical marijuana science training addresses the endocannabinoid system, clinical trial information, efficacy and dosing, strains and genetics, methods of use and types of products, condition management, and side effects.

Standard Operating Procedures will provide a detailed breakdown of the duties (what), methods (how) and schedule (when) by which each agent will perform the tasks of their respective positions. The Human Resources Manager will develop a training curriculum to educate new agents. Managers will actively train the new agents on their duties and responsibilities. At the end of the training period, the prospective agents will be given a short test regarding the policies and procedures; a solid demonstration of knowledge is a prerequisite for employment.

Systems Training
The General Manager and department managers will be responsible for developing and conducting training programs for each agent who will be using [INVENTORY SYSTEM]. [INVENTORY SYSTEM] representatives will train management on the system and provide training manuals and other materials to assist in training agents. All department managers will be responsible for knowing how to properly operate [INVENTORY SYSTEM].

Emergency Training
When fully operational, the operating hours of the facility may be 24 hours a day, 7 days per week. A limited number of agents will be necessary for nights and weekends, but operations will continue. At least one Security Officer will be on-site during operating hours. All agents employed by [COMPANY] will go through a security training/debriefing with security regarding the features of the facility, the role of security in operations and procedures in case of an emergency.

In the case of an emergency, agents will have several methods for contacting local law enforcement. The
most common will be an immediate referral to on-site security personnel. Security personnel has been hired to provide such services. In the event security is not immediately reachable, agents will be trained to alert local authorities. In no event should an agent attempt to handle or confront an emergency situation. All matters should be referred to security or local law enforcement.

Medical Marijuana and Medical Marijuana Products Handling
Within 90 days after starting employment at the facility, each medical organization’s principals and all agents whose job includes contact with medical marijuana or medical marijuana products (edible or otherwise), must complete a 2-hour training course developed by the Department and trained in food handling requirements found in applicable laws.

Anti-diversion Training
Operational policies will restrict agent access to areas where they have legitimate work tasks. All areas where medical marijuana and medical marijuana products are stored will be locked and monitored via Closed Circuit Television (“CCTV”). The background check and hiring process will eliminate applicants with criminal histories. Company employment policies include the consequences of theft, and the security briefing will make agents aware of the seriousness of the matter. Cumulatively, these policies will assist in preventing diversion of medical marijuana or medical marijuana products by our agents.

All agents are responsible for notifying the agent-in-charge of any loss or theft of medical marijuana or medical marijuana products from the facility so they can promptly document and report the incident to law enforcement and the Department as required by law. Company’s whistleblower policy addresses the concerns of agents who suspect diversion of medical marijuana or medical marijuana products from the facility by another agent, supervisor or Manager. The report will also be submitted to the Compliance Officer for further review and investigation.

Professional Development
The purpose of the professional development stage is to provide continuing education and training to company agents for new procedures, changes in rules and regulations and innovations in science and technology. [COMPANY] intends to evolve with the industry, embracing new technologies and processes that increase efficiency. The Human Resources Manager will manage agents’ professional development and where necessary, determine if a promotion, raise, demotion or termination is warranted.

Every three months, department Managers will evaluate agent performance. A written performance evaluation is performed annually. The results will be reported to the General Manager. When necessary,
the Human Resources Manager will be consulted to decide if a promotion, raise, demotion or termination is warranted. Re-training will be used as needed to address any deficient performance.

Hands-on instructional training is used to address any problems in technique or method. Memos and updated policies and procedures are used to communicate changes in Department regulations, standard operating procedures or business policies. Department meetings ensure all agents aware of operational changes. Third-party trainers may be retained as needed for professional development activities. Each department will hold team meetings on a weekly basis. The entire company will meet as a group at least quarterly to address company-wide issues and events.

A physician, pharmacist, physician assistant or certified nurse practitioner, prior to assuming any duties at the facility, must successfully complete a 4-hour training course developed and offered by the Department.

**Retention**

[COMPANY] takes retention of its staff very seriously. We recognize the value our agents bring to the operation and will work diligently to maintain a positive and supportive work environment. Being in an industry that is constantly changing requires awareness of politics, policy and market trends throughout the industry. [COMPANY] takes a proactive approach to continually provide progressive training and interactive learning opportunities. This is conducted on-site by certified trainers, but also electronically when necessary. To increase productivity and retention, agents receive constant training and educational opportunities.

[COMPANY]’s training program allows agents to advance in the company and take on additional responsibilities. By proactively and progressively training existing agents, we can ensure a ready pool of internal applicants when we need to staff an existing or new position. Our goal is to quickly staff the position with minimal or no disruption to our patients, facilities and production levels.

**Reporting Structure**

Each department Manager is responsible for ongoing performance evaluations, performance issues and recognition, promotions and disciplinary actions in their department. Managers are required to communicate all necessary information on agent performance to the Human Resources Manager as often as necessary. Managers are required to complete formal performance reviews annually and at the end of any probationary period.
The management structure assigns responsibility for the different aspects of the operation to individual managers and staff so that every agent on every level will be accountable to a Manager. Each department has defined responsibilities and must report to management on a weekly basis regarding the duties they were assigned and progress. All discipline will be handed down by the department Manager or General Manager to help keep relations between department Managers and ground level agents productive.

Job Descriptions

Chief Operations Officer
Direct experience managing a medical marijuana facility or other type healthcare facility preferably with a retail and/or regulatory component; analytically and socially intelligent; able to take responsibility for the company while maintaining a problem-solving, vision-based attitude; legal and financial knowledge; simultaneous focus on short- and long-term goals and ability to identify and respond to problems quickly and appropriately.

Chief Medical Officer
Ability to research and analyze new medical marijuana science; previous experience as medical director for a non-profit or alternative health care facility; ability to identify training and informational deficiencies and respond by implementing specific measures to counter these inadequacies; and ability to develop informational materials and training for staff and patients.

General Manager
Direct experience managing a wide variety of staff positions preferably with a retail and/or manufacturing component; analytically and socially intelligent; able to take responsibility for the company while maintaining a problem-solving, vision-based attitude; legal and financial knowledge; simultaneous focus on short- and long-term goals and ability to identify and respond to problems quickly and appropriately. Responsible for day-to-day operations including personnel, customer service, facility, equipment and all production activities.

Human Resources Manager
Prepares company’s handbooks and job duties. Keeps all agents files and records and is in charge of all hiring, termination and agent reviews. Ensures operations and staff are compliant with state and local regulations. Must have experience managing agent relations, adhering to compliance and drafting standardize company policy. Ability to draft implement measures correcting company needs.
**Compliance Manager**
Drafts and monitors all compliance procedures. Continually reconciles and monitors medical marijuana inventory to maintain full compliance with Department regulations. Maintains communication with all state and local law enforcement and regulatory agencies to ensure consistent material compliance. Must have extensive knowledge of Department regulations and continual compliance training. Has extensive knowledge of all Department regulations pertaining to medical marijuana and maintains relationships with local municipalities and enforcement.

Excellent analytical skills and ability to comprehend complex legislature and apply implications on operations as well as strong communications skills are required to maintain dialog and relationships with state department officials, law enforcement, landlords, city personnel, as well as management.

**Security Officer**
Demonstrated experience in a security management role, able to develop and manage security protocols in accordance with company policies and able to identify and respond to breaches in security or dangerous situations. Must have knowledge of medical marijuana policy and law and be able to provide security for transportation activities.

**Quality Assurance Manager**
Demonstrated management experience in a quality control program; experience performing laboratory testing and scientific research; demonstrated experience in a position requiring critical-thinking, problem-solving, planning and assessment; experience in a product withdrawal or recall situation; knowledge of medical marijuana science and testing methods; and knowledge of medical marijuana policy and law.

**Department Manager**
Demonstrated experience managing agents and basic business operations; demonstrated experience in a position requiring critical-thinking, problem-solving, planning and assessment; computer literacy in word processing, [INVENTORY SYSTEM] and database management; and knowledge of medical marijuana policy and law.

**Dispensary Specific Staff**

**Dispensary Staff Required During Hours of Operation**
Dispensary will have a minimum of five staff members scheduled during operating hours. One must be the dispensary agent-in-charge, one must be a security officer or receptionist who may also be a
licensed security guard and one must be a physician or a pharmacist. There will be one uniformed security guard and a dispensary agent-in-charge on the premises at all times during operating hours. If [COMPANY] operates more than one facility under its permit, a physician assistant or certified nurse practitioner will be onsite, if a physician or pharmacist are at the other facilities.

**Necessary Skills or Aptitude**

1. Empathy;

2. Previous experience in medical marijuana or healthcare preferred;

3. Accurate data-entry and recordkeeping;

4. Strong attention to detail;

5. Superior customer service skills;

6. Excellent communication skills;

7. Able to handle emergencies and make sound decisions;

8. Proficiency in Windows-based software and internet navigation; and


**Dispensary Manager**
Responsible for day-to-day dispensary operations, manages all agents, agent training, monitors inventory and reports any loss or irregularities.
**Assistant Manager**
Works with the Dispensary Manager to ensure dispensary operations are successful and compliant.

**Agent-in-charge**
The agent-in-charge is a designation, usually held by the Dispensary Manager or Assistant Manager. Responsible for supervising other agents and all duties described in the Department regulations. May also be a temporarily assigned position to a capable agent.

**Medical Marijuana Agent**
Responsible for dispensing duties and helping patients or caregivers find the right product for their needs and is at least 18 years of age or older.
The standard operating procedures presented in this document provide a formal outline of the procedures Keystone Center of Integrative Wellness will enact to ensure compliance with the company’s policies and the Pennsylvania Department of Health regulations.
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ADVERSE EVENT

Standard Operating Procedure No.: KCIW_SOP_XXXX

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Disclaimer: Information presented in the sop is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: It is the goal of the company to minimize the occurrence of adverse events. In the event of an adverse event, they must be documented and reported.

Purpose: To provide step-by-step instructions for the company’s protocols for documenting and reporting adverse events.

Scope: This document is designed to provide a formal outline of the procedures all personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT COMPLAINTS
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:

“Adverse Medical Experience” refers to any adverse event associated with the use of a medical marijuana product, whether or not considered medical marijuana related, including events occurring during routine product usage, such as product abuse, overdose, withdrawal or any failure of expected pharmacological action.

“Disability” refers to a substantial disruption of a person’s ability to conduct normal life function.

“Life-Threatening Adverse Medical Experience” refers to any adverse medical experience that places the patient, at immediate risk of death from the adverse medical experience as it occurs.

“Serious Adverse Medical Experience” refers to any adverse experience occurring at any dose that results in any of the following outcomes: death, a life-threatening adverse medical experience, inpatient
hospitalization or prolongation of existing hospitalization, a persistent or significant disability or incapacity, or a congenital anomaly (birth defect).

“Unexpected Adverse Medical Experience” refers to any adverse medical experience not listed in the current labeling or safety insert for the medical marijuana product. This includes events that may be symptomatically related to a listed event, but differs from the event because of greater severity or specificity.

**Procedure:**

**Step 1)** The company will report adverse events according to the procedures described herein.

**Step 2)** Receipt of Complaints:

i. Customer complaints may be received in writing, via mail, email or telephone.

ii. All complaints will be immediately forwarded to the Quality Control Manager.

iii. All complaints will be evaluated to determine if they meet the preceding definition for an **Adverse Medical Experience**.

iv. All adverse events will be documented in the **Adverse Event Log**.

**Step 3)** Investigation:

i. The Quality Control Manager shall promptly investigate all events utilizing sound scientific principles based upon the nature of the medical experience and whenever appropriate include retesting of any suspect product according to its written specifications, and shall create an **Adverse Event Report**.

ii. Submit follow-up reports to the appropriate regulatory agency within fifteen (15) calendar days of receipt, if significant new information becomes available or as requested by the department.

iii. If additional information is not obtainable, records should be maintained of the unsuccessful steps taken to seek additional information.

iv. Every effort should be made to obtain any remaining portion of the original complaint product.

v. Complaints determined to be either a **Serious** or **Unexpected** adverse medical experiences, see previous definitions, must be reported to the appropriate regulatory agency within twenty-four (24) hours of their occurrence and receipt of the complaint by the Quality Control Manager.

vi. The above reports submitted to the regulatory agency should maintain patient privacy thus not disclosing patient names or addresses.

vii. The reports should include the name of the reporter from whom the information was received.

**Step 4)** Product:

i. Any available original complaint product should be returned to the dispensary facility and subsequently forwarded to the manufacturing site for evaluation and testing.
Step 5) While Dispensary is active:

i. Minimize door opening to reduce possible contamination.

ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.

iii. When handling medical marijuana, use new gloves.

iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.

v. Maintain climate control system to mitigate airborne contamination.

vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.

vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.

viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.

ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

Records and Forms:

- Adverse Event Log
- Adverse Event Report

Competency and Responsibility:

- Employee experience and training required:
  o Trained on the Dispensary – Adverse Event SOP and related equipment.
  o Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  o Quality Control Manager.
CHECK-IN PROCEDURES

Disclaimer: Information presented in the SOP is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: To control the flow of traffic within the dispensary, the company must have a check-in procedure for each individual attempting to gain access to the dispensary.

Purpose: To provide step-by-step instructions for the check-in of patients at the Dispensary.

Scope: This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:
- UPDATING PATIENT INFORMATION
- VISITOR POLICY
- WASTE DISPOSAL

Definitions:
“Check-in Area” refers to the area within the Dispensary where patient and visitor information is recorded.

Procedure:

Step 1) The Check-in Area will be used to check-in each individual attempting to access the dispensary according to the procedures described herein.

Step 2) New Customer
   i. Warmly greet the customer by name. Introduce yourself and ask the customer how they are and say “Thank you for being a new customer and for coming in today”.
   ii. Retrieve a state issued photo ID or driver’s license, medical marijuana registration and other required identification, per regulatory agency regulations;
iii. Compare the photo on the ID to the customer’s likeness and verify all regulatory requirements, including but not limited to:
   a. Customer is 18+ years of age or is accompanied by a parent or guardian.
   b. ID is not expired.
   c. His or her information matches the ID.
   d. ID does not appear to be fraudulent. If you suspect it may be fraudulent, contact the Dispensary Manager.

iv. Scan the ID directly into the electronic tracking system, if possible, and input all required information so the customer can be checked into the sales queue.

v. If the customer is a state registered patient, ask them to complete the In State Patient Intake Form and verify it was filled out correctly.

vi. Provide the customer with a Cannabis Education Guide. Explain it is his or hers to keep and to let the appropriate dispensary employee know if he or she has any questions.

vii. The dispensary employee will greet the customer in the waiting room and take him or her to the sales area when ready. If applicable, provide the dispensary employee with the patient’s In State Patient Intake Form to verify the quantity authorized by the regulatory agency regulations.

Step 3) Returning Customer
   i. Warmly greet the customer by name. Introduce yourself and ask the customer how they are and say “It’s good to see you again”.
   ii. Follow the “New Customer” procedures for check-in.
   iii. Returning customers must present required identification each time they visit the dispensary.

Step 4) Out of State Patient (if applicable) - In full compliance with state law, the company serves cannabis patients who reside full-time in a state other than “Specify State” where the legal use of cannabis and cannabis products are recognized. The following steps must be followed in order to check in an out of state patient:
   i. Ask for the patient’s state issued photo ID or driver’s license and out of state Medical Marijuana Registration card for the medical use of cannabis;
   ii. Compare the photo on the state-issued ID to the patient’s likeness and verify that the ID is not expired;
   iii. Verify the out of state Medical Marijuana Registration has not expired and the name on the document matches the ID presented;
   iv. Perform due diligence to verify the documents presented are authentic from their state of origin;
   v. Have the patient complete both sides of the “Out of State Patient Intake Form”;
   vi. Provide a copy of the “Out of State Patient Intake Form” to the patient so it will be present, along with the sales receipt for cannabis purchases in the event the patient is stopped by law enforcement within the State of “Insert State”;
vii. Provide the patient with a “New Patient Education Guide.” Explain it is his/hers to keep and to let a Dispensary Employee know if he/she has any questions;

viii. For out of state patients, select the “Out-of-State” tab on the state’s patient sales verification system. Enter the patient’s driver’s license number into the state’s patient sales verification system and write the quantity of product that the patient is authorized to purchase on the “Out of State Patient Sales Information Card.” Inform the patient of their authorized purchase quantity.

ix. The dispensary employee will greet him/her in the waiting room and take him or her to the sales area when ready. Provide the dispensary employee with the “Out of State Patient Sales Information Card” listing the quantity of product the patient is authorized to purchase.

Step 5) Visitors and Authorized Persons

i. Refer to the VISITOR POLICY SOP for instructions.

Step 6) While Check-in Area is active:

i. Minimize door opening to reduce possible contamination.

ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL SOP.

iii. When handling medical marijuana, use new gloves.

iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All employees must maintain a sharp awareness of customers entering the dispensary facility and as they are leaving.

Records and Forms:

- Cannabis Education Guide
- Company Rules and Regulations Agreement
- Visitor Log
- Patient Intake Form: In State
- Patient Intake Form: Out of State (if applicable)
- Patient Sales Information Card

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Check-in Procedures SOP and related equipment.
- Clearance to work in the Dispensary.

- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
CLOSING PROCEDURES

Standard Operating Procedure No.: KCIW_SOP_XXXX
Revision No.: 0
Original Date of Issue: 03-20-2017
Revision Date: XX-XX-XXXX

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Background: Closing procedures are a common industry practice used to ensure the facility or site has been properly shutdown and closed for the evening as well as to deter break ins.

Purpose: To provide step-by-step instructions for the closing of the Dispensary at the end of each day.

Scope: This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- WASTE DISPOSAL

Definitions:

N/A

Procedure:

Step 1) The Dispensary will serve as the location for all closing activities according to the procedures described herein.

Step 2) Employee Checkout:
   i. Verify cash drawers have been closed out properly and any discrepancies are resolved.

Step 3) Closing:
   i. Check regulatory agency mandated reporting requirements.
   ii. Verify the electronic tracking system matches the state seed to sale tracking software for daily sales and inventory.
Step 4) Departure:
   i. Ensure each employee clocked out and checked in his or her panic button lanyard.
   ii. Ensure all facility exterior doors are properly locked.
   iii. Arm alarm.
   iv. All dispensary employees and contractors must leave with at least one (1) person when departing the facility.

Step 5) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL SOP.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All employees and contractors must maintain a sharp awareness when departing from the dispensary facility.
- It is strict company policy that a dispensary or contractor employee never leaves the facility alone.

Records and Forms:

- N/A

Competency and Responsibility:

- Employee experience and training required:
  o Trained on the Dispensary – Closing Procedures SOP and related equipment.
  o Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
COMMUNITY INTEGRATION

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Background: Integrating the community into the company’s healthcare program is a must. The company will spend a significant amount of its time encouraging the community to attend educational seminars and workshops to introduce them to the company’s products and medical marijuana in general.

Purpose: To provide step-by-step instructions for the company’s protocols for integrating the community into the company’s healthcare program.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:
- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:
N/A

Procedure:

Step 1) The company will enact community integration practices according to the procedures described herein.

Step 2) All community integration efforts must be handled in accordance with the community relations plan covering:
   i. Customer Education,
   ii. Philanthropic Giving Program,
iii. Local Outreach and Improvement,
iv. Customer Financial Assistance Program,
v. Customer-to-Customer Assistance Program, and
vi. Program Management.

Step 3) Public Relations Manager:
i. Request approval of all community integration efforts by submitting a community relations plan to the Compliance Officer.
ii. The request will include a complete description of each of the plan areas as described in the policies section.
iii. Written approval from the Compliance Officer must be obtained prior to implementing any aspect of the community integration plan.

Step 4) Compliance Officer:
i. All community relations plan requests are reviewed in accordance with the most current regulatory agency regulations to ensure all regulatory requirements have been met.
ii. Any questions and/or concerns regarding the request must be directed to the company’s legal department for guidance and/or approval.
iii. Maintain a copy of the community integration plan for review by the regulatory agency, as needed.
iv. Community integration efforts will be reviewed to ensure they meet all regulatory agency regulations.

Step 5) While Dispensary is active:
i. Minimize door opening to reduce possible contamination.
ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
iii. When handling medical marijuana, use new gloves.
iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
v. Maintain climate control system to mitigate airborne contamination.
vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:
• All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
• All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
• All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for **Cleaning, Sanitation and Hygiene**.
• All employees will receive a security briefing to ensure employees are aware of the seriousness of diversion.
• All employees must report any suspicion of theft or diversion to the Dispensary Manager, the Security Officer, or Compliance Officer immediately as a condition of employment.

**Records and Forms:**

• Community Integration Plan

**Competency and Responsibility:**

• Employee experience and training required:
  o Trained on the Dispensary – Community Integration SOP and related equipment.
  o Clearance to work in the Dispensary.
• Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
CRIMINAL ACTIVITY POLICY

Standard Operating Procedure No.: KCIW_SOP_XXXX
Revision No.: 0
Original Date of Issue: 03-20-2017
Revision Date: XX-XX-XXXX

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Background: The company intends to form a Safety and Incident Review Team to lead the incident response and management program. The team will report to management, at least on a quarterly basis, all incidents and the corrective measures taken.

Purpose: To provide step-by-step instructions for establishing the company’s criminal activity policy.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- DISCIPLINE POLICY
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:

“Conviction” means, but is not limited to, a guilty verdict, guilty plea, prayer for judgment continued, Alford plea, or “no contest” plea.

“Entry of a Conviction” occurs, for purposes of this policy, when the court accepts the plea or enters the conviction. A prayer for judgment continued is a conviction as of the date the court grants the defendant the prayer for judgment continued.

Procedure:

Step 1) The company will enact a criminal activity policy for its dispensary personnel according to the procedures described herein.
Step 2) Security Officer Responsibilities:
   i. Investigate and identify the underlying causes of incidents,
   ii. Log the incident on a secure database,
   iii. Document the incident on a secure database,
   iv. Develop remedial actions to prevent recurrence, and
   v. Monitor follow-up by management to ensure remedial actions are properly implemented.

Step 3) Dispensary Manager Responsibilities:
   i. Administering this policy according to the guidelines found herein.
   ii. Failure to appropriately administer this policy will result in corrective action for the manager up to and including dismissal.

Step 4) Pre-Employment:
   i. Conduct background checks that include criminal activity prior to hire on applicants who have been selected for hire.
   ii. If an applicant’s criminal activity report is positive for conviction(s), the regency and type of conviction(s) will be reviewed based on the job description to determine the applicant’s suitability for employment.

Step 5) Current-Employment:
   i. Any current employee who is convicted of a criminal offense other than a minor traffic infraction must notify his/her supervisor within five (5) business days of the entry of the criminal conviction;
   ii. Any current employee who routinely operates a company vehicle or personal vehicle for business purposes and is convicted of a traffic infraction must also notify his/her supervisor within five (5) business days of the entry of the criminal conviction;
   iii. Any employee operating a motor vehicle who is involved in a motor vehicle incident (ticket or accident) while in the performance of work for the company must immediately notify his/her supervisor. The employee is subject to substance abuse testing; and
   iv. Failure to report a conviction as required above is grounds for discipline up to, and including termination of employment.

Step 6) Investigation and Notifications:
   i. The Dispensary Manager must immediately notify the Human Resources Manager of the conviction or accident upon discovery;
   ii. The Human Resources Department will confirm the conviction(s); and
   iii. After verification of the conviction(s), the Human Resources Manager will coordinate with the manager any appropriate corrective action to be administered for unacceptable personal conduct in accordance with the DISCIPLINE POLICY.
Step 7) While Dispensary is active:

i. Minimize door opening to reduce possible contamination.

ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.

iii. When handling medical marijuana, use new gloves.

iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.

v. Maintain climate control system to mitigate airborne contamination.

vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.

vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.

viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.

ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

Records and Forms:

N/A

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Criminal Activities Policy SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
CUSTOMER EDUCATION AND MANAGEMENT

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Background: To ensure all patients and caregivers are properly informed about the medical marijuana products they are about to purchase the company will establish customer education and management procedures.

Purpose: To provide step-by-step instructions for customer education and management at the Dispensary.

Scope: This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- CHECK-IN PROCEDURES
- UPDATING PATIENT INFORMATION
- VISITOR POLICY

Definitions:

N/A

Procedure:

Step 1) The Dispensary will act as the location for customer education and management according to the procedures described herein.

Step 2) Greeting:

i. Select the next customer from the electronic tracking system queue to open a new order.
ii. Warmly greet the customer by name and direct towards the sales station. Introduce yourself, ask the customer how they are, say “It’s good to see you again” to repeating customers.

iii. Retrieve a state issued photo ID or driver’s license, medical marijuana registration and other required identification, per regulatory agency regulations.

iv. To initiate sales conversation, ask general and/or symptom-based questions, for instance:
   a. “How may I help you today?”
   b. “Is there a certain product or effect you are looking for?”

Step 3) Communication:
   i. Do not ask questions or mention the customer’s medical conditions unless the customer reveals their situation and asks for guidance.
   ii. Provide product recommendations based on the customer’s questions, requests, product popularity, special discounts, etc. Answer questions and provide product recommendations based on training and/or the Question Guide.
   iii. Do not use slang words such as: weed, pot, stoner, stoned, baked, etc. Instead, keep a professional nomenclature and use words like: cannabis, consumer, medicated, intoxicated, potent, etc.
   iv. Emphasize that cannabis affects people differently and new consumers should “start low and go slow”, especially with edibles and concentrates.

Step 4) Assisting Hearing Impaired Customers:
   i. The Dispensary Manager must create a Standard Informational Sheet to be provided to hearing impaired customers.
   ii. The Dispensary Manager will ensure each Customer Coordinator can easily access and provide a hard copy of the standard informational sheet and the current menu upon check in; and
   iii. The Customer Coordinator assisting hearing-impaired customers may also have to communicate by writing and reading.
   iv. The Standard Informational Sheet will include the following text, at a minimum:
      a. Welcome to our company!
      b. To make a purchase, we require a valid photo ID and your valid medical cannabis registry card, if a medical patient or caregiver. These documents will be returned to you as soon as we verify your information is correct in our system.
      c. As an in-state customer you are allowed to purchase XXX ounces in any one XXX-day period.
      d. As an in-state medical cannabis cardholder, patient or caregiver, you are allowed to purchase XXX ounces in any one XXX-day period.
      e. Our current menu is on display and available in the waiting room and sales stations.
f. In order to leave the building with cannabis, you will need to have a compliant exit package. We can sell you one for $X.00, and it is reusable.
g. If additional assistance is needed beyond your ability, notify the Dispensary Manager.
h. Please let us know if you have any questions, and we will do our best to answer them.

Step 5) Assisting Visually Impaired Customers:
i. The Customer Coordinator must hold doors and provide polite verbal directions, as needed, to help visually impaired customers navigate the store.
ii. If additional assistance is needed beyond your ability, notify the Dispensary Manager.

Step 6) Product Education:
i. Provide feedback based on general feedback (without specifics), producer training, lab reports, and current science.
ii. Never make medical claims, “This product cures migraines”. Instead, say “Generally, this product will have a sedative effect and can assist with sleep”.
iii. Discuss ingredients, suggested dosing, ingestion methods, etc. based on product training and information printed on the product’s packaging.

Step 7) Building Orders:
i. Inspect each product and verify the contents before entering the SKU into the ADP/POS system and placing into the designated container.
ii. Verify the product(s) added to the order are correct.
iii. Read the order to the customer to verify accuracy.
iv. Verify the quantity ordered is no greater than the quantity authorized by regulatory agency regulations or the Patient Medical ID Card for state registered patients.
v. Place the Patient Medical ID Card, if applicable, and products in the designated container.
   a. If the quantity ordered is more than the quantity allowed, politely explain to the customer and make recommendations for reducing the order to meet the quantity allowed.
   b. All employees must refuse to sell cannabis or cannabis products to a customer whom they suspect may be diverting product and must notify the General Manager immediately.

Step 8) Transfer to Cashier:
i. Direct customer to the Cashier’s station, or to the line if there is a wait.
ii. Walk the container to the Cashier’s station and place in line according to the customer’s position in the queue.

Step 9) While Dispensary is active:
i. Minimize door opening to reduce possible contamination.
ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL SOP.
iii. When handling medical marijuana, use new gloves.
iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All employees must maintain a sharp awareness of customers entering the dispensary facility and as they are leaving.
- Equal Access Policy:
  - All employees must treat all customers equally.
  - The company will implement any measures necessary, within reason, to ensure customers with disabilities have equal access to cannabis and dispensary services.
- Service Animals and Important Policy Points:
  - The company will follow the Americans with Disabilities Act (ADA) requirements to allow service animals on the premises.
  - **Only limited inquiries are allowed!** Employees may ask two (2) questions: (1) is the dog a service animal required because of a disability and (2) what work or task has the dog been trained to perform?
  - Employees must not ask about the person’s disability, require medical documentation, require a special identification card or training documentation for the dog, or ask the dog to demonstrate its ability to perform the work or task;
  - Allergies and fear of dogs are not valid reasons for denying access or refusing service to customers with service animals. When an employee is allergic to dog dander and a customer using a service animal must spend time in the same room, (example, in a school classroom or at a homeless shelter), both should be accommodated by assigning them to different locations within the room or preferably different rooms in the facility;
  - A customer with a disability cannot be asked to remove his or her service animal from the licensed premises unless:
    - (1) The dog is out of control and the handler does not take effective action to control it; or
    - (2) The dog is not housebroken. When there is a legitimate reason to ask that a service animal be removed, employees must offer the customer with the disability an opportunity to obtain goods or services without the animal’s presence.
  - Establishments that sell or prepare food must allow service animals in public areas, even if state or local health codes prohibit animals on the premises;
Customers with disabilities who use service animals cannot be isolated from other patrons, treated less favorably than other patrons or charged fees that are not charged to other patrons without animals. In addition, if a business requires a deposit or fee to be paid by patrons with pets, it must waive the charge for service animals;

- If a business such as a hotel normally charges guests for damage they caused, a customer with a disability may also be charged for damage caused by them or the service animal; and
- Employees are not required to provide care for a service animal.

**Records and Forms:**

- Question Guide
- Patient Medical ID Card
- Standard Informational Sheet

**Competency and Responsibility:**

- Employee experience and training required:
  - Trained on the Dispensary – Customer Education and Management SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
DISCIPLINE POLICY

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Background: The company has adopted a progressive discipline policy to identify and address employee and employment related problems.

Most often, employee conduct that warrants discipline results from unacceptable behavior, poor performance or violation of company policies, practices or procedures. However, discipline may be issued for conduct that falls outside of those identified areas.

Equally important, the company need not resort to progressive discipline, but may take whatever action it deems necessary to address the issue at hand. This may mean that more or less severe discipline is imposed in a given situation. Likewise, some company policies like sexual harassment and attendance, contain specific discipline procedures.

Of course, no discipline policy can be expected to address each and every situation requiring corrective action that may arise in the workplace. Therefore, the company takes a comprehensive approach regarding discipline and will attempt to consider all relevant factors before making decisions regarding discipline.

This policy applies to any and all employee conduct that the company, in its sole discretion, determines must be addressed by discipline.

Progressive discipline may be issued on employees even when the conduct that leads to more serious discipline is not the same that resulted in less severe discipline. That is, violations of different rules shall be considered the same as repeated violations of the same rule for purposes of progressive action.

Probationary employees are held to the highest standards for behavior and job performance. Progressive discipline is the exception rather than the rule for probationary employees.

While the company will generally take disciplinary action in a progressive manner, it reserves the right, in its sole discretion, to decide whether and what disciplinary action will be taken in a given situation. IN ADDITION, NOTWITHSTANDING ANYTHING TO THE CONTRARY IN THIS POLICY, EVERY EMPLOYMENT
RELATIONSHIP IN WHICH THCH IS INVOLVED AND THAT IS “AT WILL”, THCH RETAINS THE DISCRETION TO FOLLOW OR NOT FOLLOW THE DISCIPLINE PROCEDURES DESCRIBED ABOVE AND TERMINATE “AT WILL” EMPLOYEES FOR NO REASON.

It is the policy of the company that whenever an employee is disciplined in accordance with the policy a “Disciplinary Record” will be created and placed into the “Employee’s Personnel File”.

**Purpose:** To provide step-by-step instructions for the company’s disciplinary policy.

**Scope:** This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

**Related Standards and Procedures:**
- CRIMINAL ACTIVITY POLICY
- EMPLOYEE REPORTING AND COMPLAINTS POLICY

**Definitions:**

N/A

**Procedure:**

Step 1) The Dispensary will act as the location for disciplinary action involving dispensary personnel according to the procedures described herein.

Step 2) Dispensary Manager:
- i. Will immediately contact the Human Resources Manager when there is a situation that may or will require disciplinary action, prior to addressing the situation with the employee.

Step 3) Human Resources Manager:
- i. In conjunction with the department manager, determine the appropriate level of disciplinary action to be taken based on the situation and circumstances.
- ii. Both managers must always be present when the disciplinary action is communicated to the employee.
- iii. Ensure signatures, employee comments, etc. are properly documented during the meeting and placed in the employee Personnel File.

Step 4) Verbal Caution:
- i. An employee will be given a verbal caution when he or she engages in problematic behavior.
- ii. As the first step in the progressive discipline policy, a verbal caution is meant to alert the employee that a problem may exist or that one has been identified, which must be addressed.
iii. Verbal cautions will be documented and maintained by your manager or manager.

Step 5) Verbal Warning:
   i. A verbal warning is more serious than a verbal caution.
   ii. An employee will be given a verbal warning when a problem is identified that justifies a verbal warning or the employee engages in unacceptable behavior during the period a verbal caution is in effect.
   iii. Verbal warnings are documented and placed in the employee’s personnel file.

Step 6) Written Warning:
   i. A written warning is more serious than a verbal warning.
   ii. A written warning will be given when an employee engages in conduct that justifies a written warning or the employee engages in unacceptable behavior during the period that a verbal warning is in effect.
   iii. Written warnings are maintained in an employee’s personnel file.

Step 7) Suspension:
   i. A suspension without pay is more serious than a written warning. An employee will be suspended when he or she engages in conduct that justifies a suspension or the employee engages in unacceptable behavior during the period that a written warning is in effect.
   ii. An employee’s suspension will be documented.

Step 8) Decision-Making Leave:
   i. Generally following a suspension, an employee will be reprimanded and then sent home for the day on decision-making leave. This is intended to help the employee decide whether they should continue employment with the company.
   ii. If the employee returns, they will be expected to work harder than before to follow company guidelines and continue their employment without interruption.
   iii. The other option with this leave is the employee may choose to resign because employment with the company is not a match.

Step 9) Termination:
   i. An employee will be terminated when he or she engages in conduct that justifies termination or does not correct the matter that resulted in less severe discipline.

Step 10) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to Sanitization – Disposal Protocols SOP.
   iii. When handling medical marijuana, use new gloves.
iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

N/A

Records and Forms:

- Disciplinary Record
- Employee Personnel File
- Caution, Warning, Suspension and Termination Forms

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Discipline Policy SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
DISPENSING REQUIREMENTS

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**Background:** Mitigating diversion of medical marijuana into the market place is one of the company’s highest priorities. To accomplish this the company has developed requirements each employee must follow when dispensing medical marijuana to a patient or caregiver.

**Purpose:** To provide step-by-step instructions for establishing the company’s protocols for dispensing medical marijuana.

**Scope:** This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

**Related Standards and Procedures:**
- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

**Definitions:**
N/A

**Procedure:**

Step 1) The company will enact dispensing requirements for the transfer of medical marijuana to a patient or caregiver according to the procedures described herein.

Step 2) No medical marijuana products shall be vaporized or consumed on the premises. Customers shall not consume any food or beverages on the premises, unless necessary for medical reasons.

Step 3) Approved medical marijuana products shall not be dispensed to anyone other than the patient and/or caregiver.
Step 4) Medical marijuana shall not be dispensed to a patient or caregiver without a valid registry identification card issued by the appropriate regulatory agency.

Step 5) Product returned by a customer will not be re-dispensed to another customer.

Step 6) Purchased Cannabis:
  i. Place the purchased cannabis and cannabis products in a plain outer package when dispensed to the customer.
  ii. Include with each package dispensed a regulatory agency approved product safety insert.
  iii. Fold the package top and attach the sales receipt with a stapler.
  iv. Hand the stapled outer package to the customer and say, “Thank you for your purchase and for choosing “COMPANY”, we look forward to seeing you again”.

Step 7) Returned Product:
  i. Clearly label as a Customer Return.
  ii. A record of all returned products, their strength, lot number, quantity and reason for its return (if known) will be maintained in the Customer Product Return Log.
  iii. Place any medical marijuana products returned by a customer in a separate designated location for subsequent destruction and disposal.

Step 8) Disposal of Returned Product:
  i. Follow the WASTE DISPOSAL SOP for proper procedures.

Step 9) While Dispensary is active:
  i. Minimize door opening to reduce possible contamination.
  ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
  iii. When handling medical marijuana, use new gloves.
  iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
  v. Maintain climate control system to mitigate airborne contamination.
  vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
  vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
  viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
  ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.
Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

Records and Forms:

- Customer Product Return Log

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Dispensing Requirements SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
**EMPLOYEE REPORTING AND COMPLAINTS POLICY**

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**Disclaimer:** Information presented in the SOP is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

**Background:** The company intends to have a safe working environment for its employees. To accomplish this all employees must follow the employee reporting and complaints policy.

**Purpose:** To provide step-by-step instructions for the company’s protocols for responding to and handling employee complaints and concerns.

**Scope:** This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

**Related Standards and Procedures:**

- DISCIPLINE POLICY
- Sexual Harassment Policy
- WASTE DISPOSAL

**Definitions:**

N/A

**Procedure:**

Step 1) The Dispensary will act as the location for employee complaints involving dispensary personnel or operations according to the procedures described herein.

Step 2) Employee:

i. Talk about the problem or suggestion to the Dispensary Manager, and the manager is given the first opportunity to act on the suggestion or to settle any complaint.

ii. He or she may report the problem to the General Manager, if not fully satisfied with the manager’s decision.
iii. If the complaint or suggestion is still not settled to his or her satisfaction, the employee may take their complaint or suggestion to the Chief Operating Officer for a hearing.

iv. When requested, the Human Resources Department will assist the employee prepare his or her written complaint.

Step 3) Human Resources Manager:
  i. Must ensure the company provides a clear and open channel to employees for their expressions and suggestions.

Step 4) Dispensary Manager:
  i. When a complaint or suggestion is presented, respond with immediate and focused attention with the employee,
  ii. Provide quick action in getting the right answer, and
  iii. Follow up the initial complaint with prompt communication to the employee.
  iv. One word of caution: the managers must not give employees advice on any election or choice of benefits. If such advice should prove unreliable or result in any loss to the employee, the company could be held liable. Questions or complaints concerning this policy must be referred to the Human Resources Department.

Step 5) Higher Management:
  i. If the complaint is beyond the scope of the immediate manager’s jurisdiction, the employee should be directed to discuss the matter with a manager who has the authority to respond.
  ii. When an employee’s complaint is taken beyond the immediate manager, it is suggested the complaint be reduced to writing in order to establish the facts of the matter and avoid variations in the facts. This will assure those to whom the matter is appealed are considering the same problem presented to the immediate manager.
  iii. Although the company believes it important to preserve the immediate manager’s authority and dignity and to uphold the manager’s decision, it is vital that higher management do nothing to undermine the employee’s confidence in the company’s desire to act fairly and in good faith.
  iv. If it is decided that the immediate manager’s decision should be reversed, the higher management should:
     a. Review the facts with the immediate manager,
     b. Explain the situation and the reason why a different decision is necessary, and
     c. Encourage the immediate manager to join in the reversal of the decision.

Step 6) Sexual Harassment Policy:
  i. The company has a specific policy concerning sexual harassment and a specific procedure for complaints of sexual harassment that supersedes the procedures outlined here.
Step 7) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- All employees are encouraged to talk with a manager about any problem, complaint, or suggestion that concerns his or her work.

Records and Forms:

- Complaint Log
- Employee Personnel File

Competency and Responsibility:

- Employee experience and training required:
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
FACILITY REQUIREMENTS

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Background: The company will establish the following facility requirements to comply with the company’s policies and the Department regulations.

Purpose: To provide step-by-step instructions for establishing the company’s facility requirements.

Scope: This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions: N/A

Procedure:

Step 1) The company will enact facility requirements for each dispensary location according to the procedures described herein.

Step 2) The dispensary facility will be organized to limit any areas of customer access separate from medical marijuana product storage.

Step 3) Different operations including the receipt, storage and dispensing of medical marijuana products shall be performed within specifically defined areas of adequate size for that activity.
Step 4) Maintain receiving, storage and dispensing areas in a clean and orderly manner.

Step 5) Materials stored in boxes or cartons will be kept off the floor and suitably spaced to permit cleaning or inspection.

Step 6) Areas will be swept daily and mopped when needed.

Step 7) Equipment for adequate control of air temperature and humidity shall be provided where appropriate for the holding of medical marijuana product.

Step 8) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

Records and Forms:

- N/A

Competency and Responsibility:

- Employee experience and training required:
- Trained on the Dispensary – Facility Requirements SOP and related equipment.
- Clearance to work in the Dispensary.

- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
DOH REDACTED
HANDLING PRODUCTS AND CASH

Standard Operating Procedure No.: KCIW_SOP_XXXX
Revision No.: 0
Original Date of Issue: 03-20-2017
Revision Date: XX-XX-XXXX

Disclaimer: Information presented in the SOP is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: To ensure products are not mishandled and cash is not misplaced, the company will establish protocols for the handling of product and cash.

Purpose: To provide step-by-step instructions for the company’s protocols for ensuring no unlawful sales transactions are permitted or tolerated.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Assisting Customers
- WASTE DISPOSAL

Definitions:

N/A

Procedure:

Step 1) The Dispensary will act as the location where medical marijuana is transferred to the patient according to the procedures described herein.

Step 2) Employee Login:
   i. Before handling any product requested by a customer:
      a. Login the electronic tracking system.
      b. Enter your unique user ID and password.

Step 3) Assist the Customer:
   i. See procedure for Assisting Customers.
Step 4) Handling Medical Marijuana Products:

i. After a customer has selected a product for purchase:
   a. Scan the barcode on the product’s package to add the item to the customer’s order;
   b. If the purchase includes multiple items of the same medical marijuana product, each item must be scanned individually.
   1. Example: if a customer purchases two (2) vaporizer pens, you cannot scan the same vaporizer pen twice; each pen must be scanned separately;
   c. Place product in the order basket.

ii. After a patient or caregiver has selected a product for purchase:
   a. Scan the barcode on the product’s package to add the item to the customer’s order;
   b. If the purchase includes multiple items of the same medical marijuana product, each item must be scanned individually.
   1. Example: if a customer purchases two (2) vaporizer pens, you cannot scan the same vaporizer pen twice; each pen must be scanned separately;
   c. Ensure the quantity of the product does not exceed the authorized limit indicated on the patient sales information card; and
   d. Place product in the order basket.

Step 5) Transfer to Cashier:

i. Once the order is complete
   a. Place the order basket in the queue near the Cashier’s counter; and
   b. Explain to the customer the cashier will complete the transaction.
   c. Say, “Thank you for shopping with us and we look forward to seeing you again”.

Step 6) Handling Cash:

i. Cashiers are responsible for notifying the Dispensary Manager when their cash drawer exceeds $1,000.00;
ii. The Dispensary Manager will remove the entire cash drawer and take it into the vault;
iii. Once inside the vault, the Dispensary Manager will:
   a. Count and remove all excess cash leaving $200 in change before returning the drawer to the appropriate sales station.
   b. The removed cash will be labeled and stored inside the vault until the cashier’s check out process;
   c. All cash not inside a cash drawer at the sales station is to be secured in the vault at all times; and
   d. The manager must enter required cash records in the Daily Manager Notes Form at the close of the business day.

Step 7) While Dispensary is active:
i. Minimize door opening to reduce possible contamination.
ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
iii. When handling medical marijuana, use new gloves.
iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- The Dispensary Manager must ensure proper training requirements are met before employees are allowed to handle any products or cash.
- All employees must report any diversion or unlawful sales witnessed or suspected to the Dispensary Manager or the General Manager as soon as possible, as a condition of employment.
- Caution must be taken when handling medical marijuana products to avoid damaging the packaging and adulteration of the product.

Records and Forms:

- Daily Manager Notes Form

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Handling Products and Cash SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
INCIDENT RESPONSE AND MANAGEMENT POLICY

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Background: Incident and adverse investigations are an integral part of the company’s “Compliance Plan”. By monitoring and reporting the types of incidents and adverse events reported, steps can be taken to develop methods for reducing and eliminating occupational accidents, illnesses, and exposures. The company intends to form a Safety and Incident Review Team to lead the incident response and management program. The team will report to higher management, at least on a quarterly basis, all incidents and the corrective measures taken.

Purpose: To provide step-by-step instructions for the company’s protocols for the incident response and management policy.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- ADVERSE EVENT
- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:

“Adverse Events” refers to certain occurrences as defined in the company’s ADVERSE EVENT policies and procedures.

“Incidents” refers to certain occurrences that result in personal injury/illness to employees, patients, visitors, property damage, near miss incidents, and unplanned releases (i.e. large quantities of hazardous chemicals, water, sewer or gases).

Procedure:
Step 1) The company will enact an incident response and management plan according to the procedures described herein.

Step 2) The Security Officer must ensure the following steps are conducted:
   i. Investigate, identity, analyze and interpret the underlying causes of incidents,
   ii. If applicable, report all incidents resulting in personal injury/illness to employees, visitors, property damage, near miss incidents, and unplanned releases (i.e. large quantities of hazardous chemicals, water, sewer or gases).
   iii. If applicable, report all incidents including, near-misses, concerns, serious incidents, and unexpected customer events and product-related outcomes
   iv. Log the incident on a secure database,
   v. Document the incident on a secure database,
   vi. Develop remedial actions to prevent recurrence, and
   vii. Monitor follow-up by management to ensure remedial actions are properly implemented.

Step 3) Upon discovery or notification of an incident, the Security Officer must classify the Incident by severity and type (as outlined below) to help guide the nature of our response and subsequent reporting. Classification of Incident by type, including but not be limited to:
   i. Arrests,
   ii. Attempted robbery,
   iii. Bomb threats,
   iv. Employee misconduct,
   v. Explosion,
   vi. Fire,
   vii. Fire or security alarms,
   viii. Hazardous matter leak,
   ix. Homicide,
   x. Incidents involving law enforcement,
   xi. Injuries,
   xii. Intentional sabotage,
   xiii. Loss,
   xiv. Missing or lost data,
   xv. Missing property,
   xvi. Physical violence,
   xvii. Robbery,
   xviii. Substance abuse,
   xix. Suspicious persons,
   xx. Threatening behavior,
   xxi. Theft,
   xxii. Threats,
   xxiii. Trespassing,
xxiv. Unauthorized use of equipment or property owned by the company,
xxv. Unethical behavior, unlawful activity,
xxvi. Vandalism,
xxvii. Weapons, or
xxviii. Any other events that may adversely affect the company or its participation in the State's medical marijuana program.

Step 4) Following classification, the Security Officer will launch an investigation to determine how and why staff, equipment, supplies, systems, or other factors failed to behave or function as anticipated. The incident investigation must include, but is not limited to:

i. Protecting other people and property,
ii. Preserving the scene as it was after the incident,
iii. Conducting a visual walk-through of the incident site,
iv. Identifying and conducting interviews with all witnesses,
v. Examining, collecting, and photographing all evidence (contact Security and Local Police for assistance if the incident may be criminal in nature), and
vi. Diagramming the accident site and preparing an Incident Report.

Step 5) Document each incident within a database through an Incident Report, using standardized, searchable forms that permit cross-report analysis.

Step 6) In the event of a serious incident, an Incident Report shall be submitted to the Dispensary Manager within fourteen (14) calendar days of the incident, including a detailed description of the incident and including answers to the following:

i. What happened?
ii. Who (individuals and/or companies) was involved?
iii. When did the incident occur?
iv. What injuries/property damage resulted?
v. Who witnessed the incident?
vi. Was the regulatory agency notified and how long after the incident occurred was the agency notified?
vii. As well as a list of who was notified—outside agencies and when they were notified;
viii. List of who investigated the incident;
ix. Photographs taken;
x. Diagrams made;
xii. Witnesses’ statements; and
xii. Conclusions, if supported by the investigation, should be developed regarding the physical cause of the incident, but should not deal with the placement of legal liability upon any party.

Step 7) Reporting Criminal or Suspicious Incidents:
i. All employees must report criminal incidents or suspicious activities to the Dispensary Manager and the Security Officer; and

ii. All criminal incidents must also be reported to the General Manager.

Step 8) While Dispensary is active:

i. Minimize door opening to reduce possible contamination.

ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to Waste Disposal SOP.

iii. When handling medical marijuana, use new gloves.

iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- Refer to the MSDS for all chemicals when addressing exposure to any chemicals.
- All employees addressing an incident must wear appropriate personal protective equipment.

Records and Forms:

- Incident Report

Competency and Responsibility:

- Employee experience and training required:
  o Trained on the Dispensary – Incident Response and Management SOP and related equipment.
  o Clearance to work in the Dispensary.

- Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
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Background: Operating compliantly is critical to the success of the company and can be the difference between receiving a fine, disciplinary action and losing the permit altogether.

Purpose: To provide step-by-step instructions for the company’s protocols for maintaining legal compliance at the dispensary.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:
- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:
N/A

Procedure:

Step 1) The company will enact legal compliance practices according to the procedures described herein.

Step 2) The Compliance Officer is assigned responsibility for oversight of all regulatory compliance and for implementing and enforcing policies and procedures.

Step 3) Legal counsel must ensure the Compliance Officer is provided with necessary resources for completion of all assigned duties and regulatory compliance including third-party advisory services as necessary.
Step 4) Legal counsel must review and approve the compliance plan.
Step 5) Compliance plan describes the procedures to operate a registered medical marijuana operation in full compliance with the local codes and all Department regulations.

Step 6) Dependent upon organizational structure, all owners, officers, board members and all other members of the organization are subject to legal and Department provisions applicable to governing owners, officers and board members of the company

Step 7) Only legal counsel may execute legal compliance documents on behalf of the company.

Step 8) Compliance Officer:
   i. Develop the compliance plan in accordance with the Department regulations.
   ii. Request approval of the compliance plan.
   iii. Written approval must be obtained from legal counsel prior to implementation of the compliance plan.
   iv. Assist legal counsel with updating and maintaining the compliance plan, as needed.

Step 9) Legal Counsel:
   i. The compliance plan is reviewed in accordance with the most current Department regulations to ensure all regulatory requirements have been met.
   ii. Provide guidance to the Compliance Officer, as needed, for development and implementation of compliance plan.
   iii. Maintain a copy of compliance plan for review by the regulatory agency.

Step 10) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.
**Health and Safety Considerations:**

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for **Cleaning, Sanitation and Hygiene**.
- All employees will receive a security briefing to ensure employees are aware of the seriousness of diversion.
- All employees must report any suspicion of theft or diversion to the Dispensary Manager, the Security Officer, or Compliance Officer immediately as a condition of employment.

**Records and Forms:**

- Compliance Plan

**Competency and Responsibility:**

- Employee experience and training required:
  - Trained on the Dispensary – Legal Compliance SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
MARKETING AND ADVERTISING COMPLIANCE

Discoimss : Information presented in the SOP is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: Marketing and advertising of medical marijuana products is strictly controlled. To remain compliant will all of its marketing and advertising, the company will establish protocols for the marketing and advertising of its medical marijuana products.

Purpose: To provide step-by-step instructions for the company’s protocols for marketing and advertising medical marijuana products.

Scope: This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- N/A

Definitions:

N/A

Procedure:

Step 1) The company will market and advertise medical marijuana according to the procedures described herein.

Step 2) Dispensary Manager:

i. Request approval of all advertisements or promotions by submitting a copy of the advertisement or promotion to the General Manager and Chief Compliance Officer.

ii. The request will include a complete description of the advertisement or promotion and how or where it will be used.

iii. Written approval from the Chief Compliance Officer must be obtained prior to running any promotion.
Step 3) Chief Compliance Officer:
   i. All marketing and advertising requests are reviewed in accordance with the most current regulatory agency regulations to ensure all regulatory requirements have been met.
   ii. Any questions and/or concerns regarding the request must be directed to the company’s legal department for guidance and/or approval.
   iii. Maintain a copy of all advertising and marketing promotions for review by the regulatory agency.
   iv. Marketing efforts will be reviewed to ensure the target markets meet all regulatory agency regulations.

Step 4) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- N/A

Records and Forms:

- N/A

Competency and Responsibility:

- Employee experience and training required:
  o Trained on the Dispensary – Marketing and Advertising Compliance SOP and related equipment.
  o Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
OPENING PROCEDURES

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Background: Opening procedures ensure the dispensary is ready for business prior to any patients or caregivers arrive.

Purpose: To provide step-by-step instructions for establishing the company’s protocols for opening the dispensary on any given day.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:

N/A

Procedure:

Step 1) The Dispensary will serve as the location of all opening activities according to the procedures described herein.

Step 2) Upon Arrival:

i. Place belongings in designated area and retrieve employee occupational license or registration card.

ii. Turn on computer and log into the electronic tracking system for Clock In.

iii. Turn on printers, scanners and other applicable equipment.
iv. Conduct a walk-through of the facility to determine if there may have been any suspicious activity overnight. If needed, contact the Dispensary Manager immediately to report the activity.

Step 3) Environment:
   i. Organize printed materials,
   ii. Clear desk of clutter, and
   iii. File documents as necessary to ensure the reception and front desk area is clean and presentable.
   iv. A clean and organized reception area must be maintained at all times.

Step 4) Communications:
   i. Check emails, voicemails, and return all messages.
      a. Diligent follow-up is required.
   ii. Review the Question Guide and, if needed, consult the Dispensary Manager as soon as possible for any outstanding questions.
   iii. Answer phones:
      a. “Thank you for calling, “COMPANY”, this is ____ , how may I help you”?

Step 5) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees must maintain a sharp awareness when entering and leaving the dispensary facility and avoid arriving or leaving alone whenever possible.
• All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
• All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.
• All product handling and storage must be done in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.

Records and Forms:

• Question Guide

Competency and Responsibility:

• Employee experience and training required:
  o Trained on the Dispensary – Opening Procedures SOP and related equipment.
  o Clearance to work in the Dispensary.
• Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
PROCESSING TRANSACTIONS

Disclaimer: Information presented in the sop is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: To streamline transactions, the company has established protocols for the processing of cash and credit card transactions.

Purpose: To provide step-by-step instructions for establishing the company’s protocols for processing transactions.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- PURCHASE RESTRICTIONS
- WASTE DISPOSAL

Definitions:

“Sales Area” refers to the area onsite where cash or credit is transferred in exchange for medical marijuana.

Procedure:

Step 1) The Sales Area within the Dispensary will serve as the location of all transactions according to the procedures described herein.

Step 2) Patient Sales Verification:
   i. Verify the order’s contents do not exceed the patient’s authorized quantity as indicated on the Patient Sales Information Card, and
   ii. Provide the customer with their patient’s sales information card with the order basket.
Step 3) Using the Electronic Tracking System:
   i. Make sure each product (or item) is scanned individually.
      a. Example, if you have multiple items of the same product, you must scan each item individually;
   ii. The total price must include all state and local sales tax;
   iii. Always take your time with handling money and using the debit machine;
   iv. The Dispensary Manager will provide contact information to the appropriate support service if there are any issues with the electronic tracking system; and
   v. Make sure you logout when you are not working in the sales station.

Step 4) Entry into State Sales Portal:
   i. After the transaction is complete in the electronic tracking system, log into the state’s sales portal;
   ii. If a patient order, enter the State resident’s cannabis card number or the out-of-state patient’s driver’s license number into the electronic tracking system; and
   iii. Enter the quantity of products purchased in the electronic tracking system.

Step 5) Electronic Tracking System Crash Procedures:
   i. If the electronic tracking system is not working, you may have to manually apply the labels to the product packages;
   ii. Handwriting Sales Tickets:
      a. You will be using carbon copy tickets, similar to the ones used for pre-orders.
      b. In the center of the ticket, list the products being purchased with the post-tax price.
      c. In the bottom left corner, list the pre-tax price.
      d. If you have any questions about the tax rate and calculation, consult with the Dispensary Manager.
      e. Record all sales completed during the system crash on the Back Up Sales Log.
   iii. Once payment is complete:
      a. Place the cash or the debit receipt with the white copy of the handwritten ticket.
      b. Keep every order neatly separated so it is easy to ring up later.
      c. Provide the yellow carbon copy to the customer as their receipt.
      d. Affix a pre-printed label to each product.
      e. You will need to fill in for each label:
         1. Date,
         2. Patient # or caregiver #, if applicable, and
         3. Package ID (the SKU listed below the barcode on each product or the back of the jar).
iv. When the electronic tracking system comes back online, each order will need to be immediately rung through the registers online. To do this, refer back to each paper ticket.

Step 6) Processing Card Payments:
   i. Notify customer of additional service fees to use a debit card.
      a. Explain the cashless ATM system only allows increments of $5 and they will be provided the difference in cash if necessary.
   ii. Swipe the debit card before finalizing the transaction in the electronic tracking system;
   iii. Give customer the number pad attached to the debit machine;
   iv. Prompt them to enter their PIN number;
   v. Press the green button;
   vi. Give customer change, if applicable;
   vii. Have customer sign the dispensaries copy of the receipt;
   viii. Give customer their copy of receipt; and
   ix. Store receipt under drawer in cash register.

Step 7) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees must maintain a sharp awareness when entering and leaving the dispensary facility and avoid arriving or leaving alone whenever possible.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
• All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

• All product handling and storage must be done in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.

Records and Forms:

• Back Up Sales Log
• Patient’s Sales Information Card

Competency and Responsibility:

• Employee experience and training required:
  o Trained on the Dispensary – Processing Transactions SOP and related equipment.
  o Trained on the Electronic Tracking System and manual transactions and related equipment.
  o Clearance to work in the Dispensary.

• Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
PRODUCT COMPLAINTS

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Disclaimer: Information presented in the sop is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: Complaints are common place in the consumer products industry. Medical marijuana products are not different and will inevitably receive complaints.

Purpose: To provide step-by-step instructions for establishing the company’s protocols for handling product complaints.

Scope: This document is designed to provide a formal outline of the procedures the Dispensary Manager shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:
- Cleaning, Sanitation and Hygiene
- PRODUCT COMPLAINTS
- PRODUCT HANDLING AND STORAGE
- RECALL AND WITHDRAWAL
- WASTE DISPOSAL

Definitions:
N/A

Procedure:

Step 1) The company will make a good faith effort to resolve any complaints according to the procedures described herein.

Step 2) Complaint Handling:
   i. An employee may receive a complaint in person, by phone or via email. The employee must listen carefully and write down as much information about the complaint as
possible, including the time and date of complaint, the name and contact information for the complainant, and the subject matter;

ii. Any employee receiving a complaint must immediately inform the Dispensary Manager;

iii. The Dispensary Manager, or an employee designated by the Dispensary Manager, must record the initial complaint information recorded by the employee receiving the complaint in the **Complaint Log**;

iv. Based on the available information, the Dispensary Manager must categorize the complaint as a product complaint or other complaint. Product complaints include, but are not limited to:

   a. Dispensing errors,
   b. Bad patient reactions, and
   c. Quality-related product complaints.

   d. Complaints classified as “other” may include, but are not limited to:

      1. Neighborhood-related issues,
      2. General service-related issues,
      3. Grievances with a particular employee, or
      4. Other issues related to dispensary operations but not medical marijuana specifically.

v. The Dispensary Manager must respond to any complaint within twenty-four (24) hours by contacting the complainant to gather additional information and discuss the complainant’s desires for resolving the issue;

vi. If the complaint is product-related, the Dispensary Manager must follow the procedures for **PRODUCT COMPLAINTS**;

vii. The Dispensary Manager must use his or her discretion and complainant input to determine the appropriate steps for resolution. If the Dispensary Manager cannot fully resolve the issue or is unsure about appropriate steps for resolution, upper management must be notified and shall determine the appropriate course of action; and

viii. The Dispensary Manager must record all measures taken to resolve the complaint in the **Complaint Log**.

---

**Step 3)** **Product Complaint Investigation** - Once notification of a product complaint has been received, the Dispensary Manager must:

i. Contact the complainant and gather information about the nature of the product complaint, including the product(s) involved, the persons affected, and whether the situation involved an adverse patient reaction, a quality-related issue, or a dispensing error;

ii. Record the information gathered in the **Complaint Log**;

iii. Assemble the personnel or experts needed to conduct a product complaint investigation, if necessary;

iv. Conduct a thorough investigation into the complaint;

v. Determine the nature and potential causes of the problem;
vi. Determine any other products that may potentially be affected;

vii. Enter all information into the Complaint Log; and

viii. Determine the appropriate action, based on the general classifications provided below.

   a. Product Recall: Product poses safety or health risk to patients due to physical, chemical, biological or immunological cause(s). This includes, but is not limited to, verified or suspected product contamination. Proceed to RECALL AND WITHDRAWAL procedure;

   b. Product Withdrawal: Quality-related issue with affected product(s) that does not pose an immediate health or safety risk to patients. Proceed to RECALL AND WITHDRAWAL procedure; or

   c. Isolated Incident: An isolated incident with the affected product(s), such as an isolated dispensing error, labeling error or quality-related issue. Use discretion to determine appropriate measures for resolution, which may include a refund or product exchange.

Step 4) Record all measures taken to resolve the complaint in the Complaint Log.

Step 5) While Dispensary is active:

   i. Minimize door opening to reduce possible contamination.

   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.

   iii. When handling medical marijuana, use new gloves.

   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.

   v. Maintain climate control system to mitigate airborne contamination.

   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.

   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.

   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.

   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.

- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
• All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to and after use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

• All product handling and storage must be done in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.

Records and Forms:

• Complaint Log

Competency and Responsibility:

• Employee experience and training required:
  o Trained on the Dispensary – Product Complaints SOP and related equipment.
  o Clearance to work in the Dispensary.

• Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
PURCHASE RESTRICTIONS

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Background: Purchasing restrictions are setup to ensure patients and/or caregivers are not misusing medical marijuana and to provide the company with a level protection from customers who intend to misuse their products.

Purpose: To provide step-by-step instructions for the company’s protocols for restricting the purchases made by any given patient or caregiver.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- GENERAL PACKAGING AND LABELING REQUIREMENTS
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:

N/A

Procedure:

Step 1) The Dispensary will act as the location where purchasing restrictions for each patient and caregiver will occur according to the procedures described herein.

Step 2) Purchase Restrictions:
   i. The maximum allowable quantity of medical marijuana in the “State” is an amount that is equivalent to XX ounces of usable medical marijuana in any one 30-day period; and
   ii. An employee may not override the limit restriction.
Step 3) Scan Products for Purchase:
   i. Using the barcode scanner, scan each medical marijuana product individually for inventory.
      a. Example, if a customer purchases three (3) packets of the same type of patch, you cannot scan the same packet three times, each packet must be scanned individually.

Step 4) Discount and Pricing:
   i. Apply any discounts that may apply to the customer’s order in the electronic tracking system.

Step 5) Labels:
   i. Print and apply the proper regulatory agency mandated label(s) to all products.
   ii. Ensure all labels are fully visible and readable.
      a. Example, do not wrap a label around a cylindrical item such as a vaporizer pen. Instead, apply the label as flat as possible to the connecting cardboard or paper container. See the reference guide section Packaging and Labeling Rules and Regulations.

Step 6) Receipts:
   i. Every customer must be given a receipt (by law).
   ii. Processing the transaction must keep a copy of each receipt.
   iii. At the end of the shift, the cashier must attach all receipts to his or her Electronic Tracking System Summary Sheet and put in the appropriate area for the recorder or accountant to handle; and
   iv. When checking out each cashier at the end of his or her shift, the Dispensary Manager must ensure all receipts are attached to the cashier’s electronic tracking system summary sheet.

Step 7) Packaging:
   i. All products must be contained and sealed within a compliant, child-resistant bag before exiting the dispensary;
   ii. The exit bag may need to be opaque, resealable, and ASTM approved;
   iii. Customers may pay a small fee for the package or bring in their own;
      a. If so, enter the CPU code to add the item to the checkout list before finalizing purchase, if applicable.
   iv. If an employee is unsure if the package a customer has brought in is compliance, he/she must consult with the Dispensary Manager; and
   v. The entire order is then bagged up to deter the customer from opening it while on the premises. See procedure for GENERAL PACKAGING AND LABELING REQUIREMENTS and the reference guide section Packaging and Labeling Rules and Regulations.
Step 8) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily.

Health and Safety Considerations:

- The Dispensary Manager is assigned responsibility for oversight of all purchase restrictions and will inform employees regarding the legal purchase restrictions, the electronic tracking system features that prevent excess purchases, and train employees on purchase procedures.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to use according to the requirements listed in the procedure for “Cleaning, Sanitation and Hygiene”.

Records and Forms:

- Electronic Tracking System Summary Sheet
- Packaging and Labeling Rules and Regulations

Competency and Responsibility:

- Employee experience and training required:
  o Trained on the Dispensary – Purchase Restrictions SOP and related equipment.
  o Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
QUALITY CONTROL

Standard Operating Procedure No.: KCIW_SOP_XXXX
Revision No.: 0
Original Date of Issue: 03-20-2017
Revision Date: XX-XX-XXXX

Disclaimer: Information presented in the SOP is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: Quality control measures will be established by the company to ensure no products leave the dispensary in sub-par quality, mislabeled, misbranded, damaged or expired.

Purpose: To provide step-by-step instructions for the company’s quality control practices.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:

N/A

Procedure:

Step 1) The company will enact quality control measures for its dispensary operations according to the procedures described herein.

Step 2) Employees working directly with medical marijuana in the dispensary must be trained to identify signs of contamination and sub-standard product. The Dispensary Manager is responsible for training employees and oversight of all quality control activities.

Step 3) The Dispensary Manager must approve the disposal of any medical marijuana in accordance with the requirements listed in procedure for WASTE DISPOSAL.
Step 4) All medical marijuana packaging is to be inspected to ensure the product is contained within a resealable, childproof, opaque and tamper-evident package that is properly labeled according to the Packaging and Labeling Rules and Regulations.

Step 5) All medical marijuana is to be inspected to ensure the product is not expired, damaged, opened or otherwise adulterated.

Step 6) The inspection of medical marijuana must be conducted in an area with sufficient lighting to allow for adequate inspection.

Step 7) Medical marijuana with non-compliant packaging and labeling or that has been damaged and/or expired must be removed and disposed of with Dispensary Manager approval and in accordance with the requirements listed in procedure for WASTE DISPOSAL.

Step 8) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All product handling and storage must be done in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

Records and Forms:

- Packaging and Labeling Rules and Regulations
Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Quality Control SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
RECALL AND WITHDRAWAL

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Background: The company will adhere to an adopted step-by-step plan for the recall of any products that have a reasonable probability of causing adverse health consequences based on a testing result, bad customer reaction, or other reason. The general manager is assigned the responsibility for the evaluation and execution of product concerns brought to his/her attention and initiate any necessary product recalls or withdrawals. The compliance officer is assigned the responsibility for oversight of the proper execution of any product recall or withdrawals and their timely reporting to the regulatory agency. A recall coordinator is to be appointed by the general manager and members of the recall team will be identified from the various functional areas. If the general manager is unsure of the need for withdrawal or recall or of the correct event classification, the company chief executive officer or executive board must be contacted immediately for a decision. The chief executive officer or executive board may engage the services of an expert to assist the process. Any determination by the general manager to implement recall procedures must be supported by test results or other scientific documentation or expert opinion.

Purpose: To provide step-by-step instructions for the company’s protocols for the withdrawal and recall of medical marijuana products.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related standards and procedures:

- ADVERSE EVENT
- Cleaning, Sanitation and Hygiene
- PRODUCT COMPLAINTS
- PRODUCT HANDLING AND STORAGE
- QUALITY CONTROL
- WASTE DISPOSAL
**Definitions:**

“Recall” is generally undertaken to protect consumer health and safety. A recall typically involves the presence of bacteria or a substance that may cause a potential adverse health reaction. The term “recall” should be used carefully and only when regulatory agency regulations mandate. Otherwise, the term withdrawal must be used.

“Withdrawal” is conducted for quality purposes or as a precautionary measure before an official recall is implemented.

**Procedure:**

Step 1) The company will enact product recall and withdrawal measures for its dispensary operations according to the procedures described herein.

Step 2) The following examples would constitute an incident requiring a withdrawal or recall:

1. Product found with a pesticide residue for an illegal/restricted chemical;
2. Product found with a pesticide residue above permitted legal limits;
3. Known, assumed or suspected product contamination by chemical, physical or microbiological hazards;
4. Incorrect labeling which may constitute a breach in food safety, quality or legality standards;
5. Notification from a supplier than any of the above had occurred to product prior to supply; and
6. Malicious contamination.

Step 3) Investigate complaint:

1. Gather information from the customer, supplier, or regulator about the nature of the product complaint;
2. General manager must assemble the employees or experts needed to conduct a product complaint investigation;
3. Conduct a thorough investigation into the problem with the affected product;
4. Determine the nature and potential causes of the problem;
5. Determine any other product(s) that may potentially be affected; and
6. Determine, from the criteria below, whether the situation constitutes:
   a. **Product Recall**: a food safety or health risk due to physical, chemical, biological or immunological cause(s),
   b. **Product Withdrawal**: a quality-related issue with the affected product(s), or
   c. **No Corrective Actions**: an isolated incident with the affected product(s).

7. (according to the appropriate state division of public health, heavy metal limits will follow the standards of the *american herbal pharmacopoeia cannabis inflorescence standards of identity, analysis and quality control*, which take precedence over the heavy metals limits set forth in state regulations).
Step 4) Notify legal counsel, insurance company, and Chief Executive Officer:
   i. The General Manager must notify legal counsel that a situation meets the criteria for a withdrawal or recall.
   ii. The Chief Executive Officer must approve any recommendations by counsel for alternative procedures;
   iii. The General Manager must notify the insurance company and determine coverage; and
   iv. The General Manager must notify the Chief Executive Officer of his/her findings and discuss event classification.

Step 5) Assess and classify event:
   i. Conduct an assessment to determine the procedures to implement. Items to consider include:
      a. Whether or not disease or injuries have already occurred from use of the product;
      b. Hazard to various segments of the population (e.g. Immunocompromised patients) who are expected to be exposed to the product being considered;
      c. Degree of seriousness of the health hazard to which the population at risk would be exposed; and
      d. Likelihood of occurrence of hazard.

Step 6) Assign event to the following classes:
   i. Class 1: an emergency situation involving removal from the market of products in which the consequences of use or exposure to the product are life-threatening or involve a serious adverse health consequence;
   ii. Class 2: a situation in which the use of, or exposure to, a contaminated product may cause temporary adverse health consequences or where the probability of serious adverse health consequence is remote (ex: pathogenic bacterial population, exclusive of c. Botulinum, adequate to cause food poisoning);
   iii. Class 3: a situation in which the use of, or exposure to, the product is not likely to cause adverse health consequences (ex: a non-hazardous labeling violation); and
   iv. Seek Chief Executive Officer approval for the event classification.
      a. If the Chief Executive Officer approves a recall, they must issue a press release to the regulatory agency immediately.

Step 7) Determine type of product(s) affected:
   i. Finished Product = all products that have been partially or completely distributed, including products for sale in dispensary,
   ii. Work in Progress = all products that have not been distributed, including but not limited to vegetative and flowering plants, cannabis in storage, and infused oils and/or butters in storage;
   iii. Ingredient = all ingredients for dispensary or manufacturing; and
iv. **Packaging Material** = all packaging material or containers used for work in progress or finished products.

**Step 8)** **Finished Product** affected product:
   i. Assemble employee needed to conduct tracking of a finished product;
   ii. Identify affected and any other potentially affected product(s), product code(s) and production date(s);
   iii. Determine the quantity of affected product(s) produced;
   iv. Determine from the electronic tracking system the last day of shipment/distribution (if applicable, also patient and caregiver) for the affected product(s);
   v. Determine from the electronic tracking system all patients, caregivers and licensees who purchased the affected product(s) during this period (i.e. Period = day of packaging to last day of shipment); and
   vi. Determine from the electronic tracking system the remaining quantity of the affected product(s) in company inventory.

**Step 9)** **Work in Progress** affected product:
   i. Assemble the employees needed to conduct tracking of a work-in-progress product.
   ii. Identify the affected and any other potentially affected product(s), product code(s) and production date(s) from the production records.
   iii. Determine from the electronic tracking system and production records the quantity of the affected product(s) produced.
   iv. Locate the affected product(s) from the dispensary area, storage areas, cooler(s), freezer(s), etc.

**Step 10)** **Ingredient** based affected product:
   i. Assemble the employee needed to conduct tracking of an ingredient;
   ii. Identify the affected and any other potentially affected ingredient(s) and lot number(s)/production code(s)/best before date(s)/receiving date(s);
   iii. Determine the quantity and receiving date of the affected ingredient(s) received;
   iv. Based on the lot number and receiving date, determine from the production records the period of use for the ingredient;
   v. Determine from the production records all the finished product(s) produced by the affected ingredient(s);
   vi. Determine from the production records the quantity of the affected product(s) produced during this period;
   vii. Determine from the production records and inventory records the day the affected product(s) entered company inventory (i.e. Packaging date);
   viii. Determine from the electronic tracking system the last day of shipment (and the customer) for the affected product(s);
ix. Determine from the electronic tracking system all the patients or designated caregivers who purchased the affected product(s) during this period (i.e. Period = day of packaging to last day of shipment); and

x. Determine from the electronic tracking system the remaining quantity of the affected product(s) in company inventory).

Step 11) **Packaged Material** affected product:
   i. Identify affected and any other potentially affected packaging material(s) and lot number(s)/quality control code/receiving date(s);
   ii. Determine the quantity and receiving date of the affected packaging material(s) received;
   iii. Based on the type and size of packaging material, determine all the finished product(s) associated with the affected packaging material(s);
   iv. Determine from the production records the period of use for the affected packaging material(s);
   v. Given the affected period and product, determine from the electronic tracking system the quantity of the affected product(s) associated with the affected packaging material(s) in this period;
   vi. Determine from the production records and electronic tracking system the day the affected product(s) entered into company inventory (i.e. Packaging date);
   vii. Determine from the electronic tracking system the last day of shipment (and the patient or designated caregiver) for the affected product(s);
   viii. Determine from the electronic tracking system all the patients or designated caregivers who purchased the affected product(s) during this period (i.e. Period = day of packaging to last day of shipment);
   ix. Determine from the electronic tracking system the remaining quantity of the affected product(s) in our inventory; and
   x. Locate any remaining affected packaging material(s) from the storage shelves and cabinets.

Step 12) Execute Withdrawal or Product Recall:
   i. Assemble the withdrawal or recall team ensuring adequate resources are available for the severity of the issue;
   ii. Gather all information collected in the tracking process;
   iii. Ensure the following information is accurately provided:
      a. Name and product code of the withdraw/recalled product(s);
      b. Production date(s) of the withdraw/recalled product(s);
      c. Reason for the withdrawal/recall;
      d. Quantity of withdraw/recalled product(s) distributed;
      e. Quantity of withdraw/recalled product(s) in inventory (for internal use only); and
f. Area(s) of distribution as well as patients or designated caregivers affected (for internal use only).

iv. Detain and segregate all products to be recalled, which are in our control.

v. Adhere a DO NOT DISTRIBUTE sign and complete any relevant internal logs/forms;

vi. Send a **Notification of Recall** to the affected patient or designated caregiver; and

vii. Notify the regulatory agency within twenty-four (24) hours.

viii. Coordinate and monitor the recovery of all affected product(s);

ix. Products in the homes of patients or caregivers should be picked up by company employees in accordance with regulatory agency regulations.

x. Reconcile the total quantity of recalled product and affected product in inventory against the total quantity produced.

xi. Randomly remove and submit samples of recalled product(s) to an independent laboratory for testing as appropriate.

xii. Collect testing results and discuss the results and corrective actions that may be required with the regulatory agency.

xiii. The general manager must prepare a **Withdrawal and Recall Report**.

xiv. Complete all cleaning and sanitation procedures according to the requirements listed in the procedure for **Cleaning, Sanitation and Hygiene**.

**Step 13) While Dispensary is active:**

i. Minimize door opening to reduce possible contamination.

ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.

iii. When handling medical marijuana, use new gloves.

iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the **Cleaning, Sanitation and Hygiene**.

v. Maintain climate control system to mitigate airborne contamination.

vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.

vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.

viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.

ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

**Health and Safety Considerations:**

- All product handling and storage must be done in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.

- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
• All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.

Records and Forms:

• American Herbal Pharmacopoeia Cannabis Inflorescence Standards of Identity, Analysis and Quality Control
• Inventory Records
• Production Records
• Notification of Recall
• Waste Disposal Log
• Withdrawal and Recall Report

Competency and Responsibility:

• Employee experience and training required:
  o Trained on the Dispensary – Recall and Withdrawal SOP and related equipment.
  o Clearance to work in the Dispensary.

• Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
DISCLAIMER: Information presented in the SOP is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

BACKGROUND: To promote accountability among company employees, the company will establish a receipt and acknowledgment program. This program will prevent any employee from claiming they were unaware or not trained to handle an assigned task.

PURPOSE: To provide step-by-step instructions for the company’s protocols for the receipt and acknowledgement of training and other materials by its employees.

SCOPE: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

RELATED STANDARDS AND PROCEDURES:

N/A

DEFINITIONS:

N/A

PROCEDURE:

Step 1) The company will enact receipt and acknowledgement measures for its dispensary employees according to the procedures described herein.

Step 2) Dispensary Manager Responsibility:
   i. Provide employees with the Employee Manual and Receipt of Acknowledgement.
   ii. Ensure employees are provided the appropriate and updated Standard Operating Procedures for their specific area(s) of responsibility.
   iii. Immediately address any questions and/or concerns from employees.
   iv. Ensure the employee signs and returns the Receipt of Acknowledgement.
v. Provide a copy of the signed Receipt and Acknowledgement document to the Human Resources department.
vi. Place the original signed Receipt and Acknowledgement document in the employee’s personnel file at the dispensary.

Step 3) Employee Responsibility:
i. Thoroughly read the company Employee Manual and all assigned Standard Operating Procedures.
ii. Address all questions with the Human Resources department, prior to signing the Receipt and Acknowledgement document.

Step 4) Human Resources Department Responsibility
i. Ensure employee is provided the appropriate and updated Employee Manual.
ii. Immediately address any questions and/or concerns from the employee.
iii. Place the signed Receipt and Acknowledgement document in the employee’s personnel file.

Step 5) While Dispensary is active:
i. Minimize door opening to reduce possible contamination.
ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
iii. When handling medical marijuana, use new gloves.
iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
v. Maintain climate control system to mitigate airborne contamination.
vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

N/A

Records and Forms:

- Employee Manual
- Receipt and Acknowledgement Form
Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Receipt and Acknowledgement SOP and related equipment.
  - Clearance to work in the Dispensary.

- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
RECORDKEEPING

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Background: The company will make its books and records available to the regulatory agency or its authorized representatives upon request for monitoring, onsite inspection and audit purposes. The company will maintain back-up records for a minimum of five (5) years and will be made available to the appropriate regulatory agency, upon request.

Purpose: To provide step-by-step instructions for the company’s protocols for proper recordkeeping.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- WASTE DISPOSAL

Definitions:

N/A

Procedure:

Step 1) The Dispensary will be used to conduct all of the recordkeeping methods according to the procedures described herein.

Step 2) The company shall maintain, at a minimum, the following categories of records:

i. Standard operating procedures;
ii. Inventory records including seed to sale tracking;
iii. Confidential patient and caregiver records including:
a. Electronic tracking system patient and caregiver profiles and dispensing history;
b. All dispensed medical marijuana products and periods of no-fill (zero report);
c. Dispensing errors;
d. Allergy and adverse event reporting; and
e. Medical marijuana product recalls.

iv. Employee records and policies;
v. Waste disposal records;
vi. Maintenance records; and

Step 3) Business Records include:
   i. The company’s assets and liabilities;
   ii. Fixed asset schedules;
   iii. Insurance and escrow requirements;
   iv. All monetary transactions;
   v. Books of accounts including journals, ledgers, and supporting documents, agreements, checks, invoices, vouchers, monthly and quarterly reports, and annual audits;
   vi. Sales records;
   vii. Salary and wages paid to each employee, stipend paid to each executive manager, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with the company;
   viii. All licensing documentation and other correspondence with the regulatory agency; and
   ix. All other corporate documents required by law including but not limited to meeting minutes, annual reports, stock or membership agreements.

Step 4) Dispensary Manager Responsibilities:
   i. Ensure true and correct records of all dispensary records at the facility are maintained in a timely and organized manner.

Step 5) Controller Responsibilities:
   i. Ensure true and correct records of the company are maintained in a timely and organized manner.
   ii. Shall provide real-time operating information to management necessary to make quick and informed decisions in the normal course of business.
   iii. Submit software requests to the General Manager for approval.

Step 6) Chief Operating Officer (COO) Responsibilities:
   i. Ensure all applicable laws and regulations are followed in the operation.
   ii. Centralize the purchasing of company software to ensure all applications conform to the regulations and company software standards.
   iii. Ensure all such software must be used in compliance with applicable licenses, notices, contracts, and agreements.
iv. Whenever possible, elect electronic tracking system that allows the use of standard hardware and that provide sufficient back-up capabilities.

Step 7) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.
- All product handling and storage must be done in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.

Records and Forms:

- Business Records

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Recordkeeping SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
Disclaimer: Information presented in the sop is intended to be used by those skilled in the art, and is subject to change. It will require updates, as methodologies evolve, equipment specifications are determined, internal quality control protocols develop, local and state regulations are identified, and facility layouts are defined.

Background: This document is to ensuring employees are familiar with the signs of medical marijuana abuse and appropriate reasons and protocols for refusing a sale.

Purpose: To provide step-by-step instructions for the company’s protocols for the refusal of sale to a patient or caregiver.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- PURCHASE RESTRICTIONS
- WASTE DISPOSAL

Definitions:

“Abuse” means the misuse, overconsumption or repeated attempts to acquire more medical marijuana than what is recommended by a patient and/or caregiver within any 30-day period.

Procedure:

Step 1) The company will enact methods for the refusal of sale and recognizing signs of abuse according to the procedures described herein.

Step 2) Recognize the Signs of Medicine Abuse or Instability in the Medical Use of Marijuana:

i. According to the Diagnostic and Statistical Manual for Mental Disorders, 4th edition (DSM-IV), substance abuse refers to an unhealthy pattern of substance use resulting in significant problems in one or more of the following ways:
a. Recurrent substance use resulting in a failure to fulfill major role obligations at work, school or home (e.g. repeated absences or poor work performance related to substance use; substance related absences, suspensions or expulsions from school; neglect of children or household);
b. Recurrent substance use in situations in which it is physically hazardous (e.g. driving an automobile or operating a machine when impaired);
c. Recurrent substance related legal problems (e.g. arrests for intoxication or disorderly conduct); and
d. Continued substance use despite recurrent social or interpersonal problems caused or exacerbated by the effects of the substance (e.g. arguments with spouse about consequences of intoxication, physical fights, etc.).

Step 3) Employee Discretion:
   i. Recognizing medicine abuse in customers may be difficult;
   ii. Be cognizant of behaviors that may demonstrate abuse or instability. Such behaviors may be exhibited by, but are not limited to:
       a. An unkempt appearance or lack of personal hygiene,
       b. Child neglect,
       c. Restlessness,
       d. Paranoid thinking,
       e. Poor memory, or
       f. Difficulty concentrating.
   iii. Do keep in mind, any of these behaviors may be related to the mental or physical health of a patient, or a symptom of an illness;
   iv. If you suspect a patient or caregiver is abusing cannabis or if an employee reports suspicion, notate it in the patient’s or caregiver’s record;
   v. If a customer is clearly intoxicated (in a state of diminished physical and/or mental control), the company reserves the right to refuse service;
   vi. Ultimately, an employee must use his or her best judgment when deciding to refuse a sale and may do so without fear of reprisal from management; and
   vii. If a sale is refused, record the incident in patient record following the protocols outlined in Step 4) Refusal of Sale.

Step 4) Refusal of Sale:
   i. Any employee may refuse to dispense products to any customer whom would exceed the allowable limit;
   ii. If an employee believes the customer or the general public would be placed at risk, he/she should refuse the sale without fear of management retribution;
   iii. To a customer whom the employee suspects may be diverting product and must notify the Dispensary Manager immediately; and
   iv. If a patient or caregiver, each time they request and do not obtain products from the company.
a. Employee must record in the patient record the:
   1. Date,
   2. Name and registry cardholder’s number, and
   3. Reason the products were not provided.

Step 5) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All work areas, contact surfaces, utensils and tools must be cleaned and sanitized prior to use according to the requirements listed in the procedure for Cleaning, Sanitation and Hygiene.
- All product handling and storage must be done in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.

Records and Forms:

- Diagnostic and Statistical Manual for Mental Disorders, 4th edition (DSM-IV)

Competency and Responsibility:

- Employee experience and training required:
  o Trained on the Dispensary – Refusal of Sale and Recognizing Signs of Abuse SOP and related equipment.
  o Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  o Dispensary Manager.
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STAFFING AND TRAINING

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Background: To operate successfully the company must staff and train employees to work in the dispensary.

Purpose: To provide step-by-step instructions for the company’s protocols for the staffing and training of dispensary employees.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- RECEIPT AND ACKNOWLEDGEMENT
- WASTE DISPOSAL

Definitions: N/A

Procedure:

Step 1) The company will enact methods for the staffing and training of dispensary employees according to the procedures described herein.

Step 2) Staffing:

i. The Dispensary Manager shall hire the necessary staff to ensure the dispensing of cannabis is performed in accordance with regulatory agency regulations.

ii. Staffing estimates will be updated regularly.
Step 3) Employee Training Required:
   i. The Dispensary Manager must complete or assign completion of a **Daily Walk-Through Log** to ensure compliance with training policies and regulatory agency regulations.
   ii. All employees will receive an **Employee Manual** prior to employment. This employee manual provides in-depth training of company policies and procedures.
   iii. All employees will receive the appropriate **Standard Operating Procedures** for their assigned responsibilities.
   iv. Each employee must receive, read, and acknowledge their understanding of the material covered in the employee manual and **Standard Operating Procedures**.
   v. All employees must be trained by the Dispensary Manager and continually demonstrate a working knowledge of training materials as a condition of employment.
   vi. All changes to the dispensary **Standard Operating Procedures** shall be communicated to all dispensary employees and an acknowledgement of understanding must be documented for each employee.
   vii. All employees receive professional and appropriate training on compliance with state law, the therapeutic use of medical marijuana, safety, security, incident management, diversion and theft prevention.
   viii. No employee may work onsite prior to receiving orientation training or when any required critical training is eight (8) weeks or more past due.
   ix. All employees will receive training on the dispensary methods and products employed by the company.

Step 4) Prior to Working the Facility, Employees Shall Receive Full Training on:
   i. The methods of dispensing used;
   ii. The electronic tracking system used;
   iii. All remaining areas of the dispensary operations; and
   iv. The safe handling of medical marijuana.

Step 5) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to **WASTE DISPOSAL**.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the **Cleaning, Sanitation and Hygiene**.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for **PRODUCT HANDLING AND STORAGE**.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.

Records and Forms:

- Daily Walk-Through Log
- Employee Manual
- Standard Operating Procedures

Competency and Responsibility:

- Employee experience and training required:
  - Trained on the Dispensary – Staffing and Training SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
UPDATING PATIENT INFORMATION

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Background: From time to time a patient and/or caregiver’s information will change. The company will make sure to accommodate any customer whose personal information has changed.

Purpose: To provide step-by-step instructions for the company’s protocols for updating patient and/or caregiver information.

Scope: This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

Related Standards and Procedures:

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- Returning Patient Checklist
- WASTE DISPOSAL

Definitions:

N/A

Procedure:

Step 1) The company will enact methods for updating patient and/or caregiver information at the dispensary according to the procedures described herein.

Step 2) If the patient provides a new Medical Marijuana Registration (MMR), show the Dispensary Manager the new MMR with the patient’s ID for verification.

Step 3) Download the files that need to be updated which includes, but not limited to:
   i. Driver’s license;
ii. MMR;
iii. Physician’s recommendation; and
iv. Other required documentation.

Step 4) Scan in new documents, label and save accordingly in the front desk computer.

Step 5) Update records in the patient profile (ID/MMR #s and expiration dates).

Step 6) Check-in patient in accordance with the Returning Patient Checklist procedure.

Step 7) Return the patient’s documentation and then combine and remove old patient records, as needed.

Step 8) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
   ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

Health and Safety Considerations:

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.

Records and Forms:

- N/A

Competency and Responsibility:

- Employee experience and training required:
- Trained on the Dispensary – Updating Patient Information SOP and related equipment.
- Clearance to work in the Dispensary.

- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
## VISITOR POLICY

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**Background:** As a flagship dispensary, the company expects to have visitors at its facility.

**Purpose:** To provide step-by-step instructions for establishing the company’s visitor policy.

**Scope:** This document is designed to provide a formal outline of the procedures all dispensary personnel shall follow to ensure compliance with the company policy and regulatory agency regulations.

**Related Standards and Procedures:**

- Cleaning, Sanitation and Hygiene
- PRODUCT HANDLING AND STORAGE
- RECORDKEEPING
- WASTE DISPOSAL

**Definitions:**

N/A

**Procedure:**

Step 1) The company will enact a visitors policy according to the procedures described herein.

Step 2) Security Associate Responsibility:

i. When visitors arrive at the facility, verify the visitor is expected and has the appropriate approval.

ii. Ask the visitor(s) to provide a valid photo ID and scan it. Regulatory agency representatives and law enforcement officers should be asked to show an official identification card and/or badge.

iii. Verify the visitor is over 18 years of age and that their ID is not expired.
iv. Use the **State and Country Photo ID Verification Booklet** to verify the authenticity of the visitor’s ID card.

v. Enter scanned IDs into electronic tracking system.

vi. Photocopy the visitor’s valid driver's license or identification badge.

vii. Enter the relevant information into the **Visitor Log**.

viii. Issue the visitor a laminated visitor badge and ask him/her to wear the badge around his/her neck in a manner that ensures the badge is visible at all times (i.e. cannot be in shirt pocket or under shirt or under a jacket).

ix. Explain the badge is property of the company and must be returned before leaving.

x. If the visitor requires access to areas where security equipment, cash, or medical marijuana are stored, they must be continuously escorted.

xi. In the event prior approval is impractical due to unforeseen circumstances, you must attach a report to the **Visitor Log** indicating the following:
   a. Name of the visitor,
   b. Date,
   c. Time,
   d. Purpose of the visit, and
   e. Facts upon which access was granted.

xii. Ensure and validate the visitor filled in the following information in the **Visitor Log**:
   a. Date;
   b. Visitor Badge #;
   c. Visitor Name;
   d. Visitor Signature;
   e. Reason for Visit;
   f. Time in, and upon leaving the facility;
   g. Time departed facility; and
   h. Any additional information required by the regulatory agency regulations.

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**Step 3) Employee Responsibility:**

i. Must continuously escort the visitor while in the licensed premises.

ii. Ensure the visitor only has access permissions for public areas such as waiting rooms, bathrooms, and break rooms.

iii. The visitor must scan their badge at all access points to record movement within the facility, however the escorting dispensary employee will need to unlock all limited or restricted access areas for the visitor.

iv. Immediately report suspicious behavior by visitors or any deviation from these procedures to the Security Associate or Dispensary Manager.

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**Step 4) Visitors are not to be admitted to enter the facility, except as absolutely required for business functions.**

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**Step 5) Unannounced visitors will not be allowed to enter the facility.**
Step 6) All authorized visitors must be documented on the Visitor Log and continuously escorted by a dispensary employee with a valid employee occupational license or registration card.

Step 7) Only dispensary employees of the company, regulatory agency representatives, law enforcement, other officials acting in the course of their duties, outside vendors, contractors, and authorized visitors may access the dispensary facility.

Step 8) Any unauthorized person must be denied access to the facility, and staff may contact law enforcement as necessary to remove unauthorized individuals from the licensed premises. The Dispensary Manager must be notified immediately.

Step 9) Aside from regulatory agency representatives and law enforcement officers, the dispensary facility will not accept unannounced visitors.

Step 10) The only persons who may be on the company’s licensed premises include:
   i. A dispensary employee;
   ii. A patient who holds a valid Medical Marijuana Registration (MMR) card;
   iii. The caregiver of a patient who holds a valid MMR card;
   iv. A regulatory agency representative and/or law enforcement officers inspecting the dispensary pursuant to regulatory agency regulations;
   v. Other officials acting in the course of their duties;
   vi. Outside vendors;
   vii. Contractors;
   viii. Authorized visitors; and/or
   ix. All other authorized visitors not identified above must follow the Visitor Policy procedure.

Step 11) While Dispensary is active:
   i. Minimize door opening to reduce possible contamination.
   ii. Keep area tidy, swept, and uncluttered – ensure waste materials are immediately disposed of according to WASTE DISPOSAL.
   iii. When handling medical marijuana, use new gloves.
   iv. Tools and other equipment and surfaces should be lightly cleaned with 91% isopropyl alcohol daily or as necessary according to the Cleaning, Sanitation and Hygiene.
   v. Maintain climate control system to mitigate airborne contamination.
   vi. Use sanitary handling procedures in accordance with the requirements listed in procedure for PRODUCT HANDLING AND STORAGE.
   vii. Store packaging materials and medical marijuana appropriately to prevent contamination and adulteration.
   viii. Prevent cross-contamination and mix-ups between contaminated and unadulterated medical marijuana.
ix. All cannabis and cannabis product waste from dispensary operations must be disposed of in accordance with the procedures for WASTE DISPOSAL.

**Health and Safety Considerations:**

- All dispensary employees will receive proper training prior to employment to ensure efficient and compliant procedures are upheld to the company’s standards.
- All employees must maintain a sharp awareness when entering and leaving the dispensary facility and avoid arriving or leaving alone whenever possible.
- All employees are required to properly display a valid employee occupational license or registration card at all times while on the licensed premises of the dispensary facility.
- Employees are equipped with a panic button lanyard or can easily access a stationary panic button in the work area(s).
- All records must be maintained in accordance with the procedure for RECORDKEEPING.

**Records and Forms:**

- State and Country Verification Booklet
- Visitor Log

**Competency and Responsibility:**

- Employee experience and training required:
  - Trained on the Dispensary – Visitor Policy SOP and related equipment.
  - Clearance to work in the Dispensary.
- Employee with supervisory responsibility for this Standard Operating Procedure:
  - Dispensary Manager.
DOH REDACTED
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