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): Dauphin
County 2 (if applicable): Cumberland
County 3 (if applicable): N/A

Pennsylvania Department of Health
Medical Marijuana Regions

[Map of Pennsylvania showing regions]
Medical Marijuana Dispensary Permit Application

Part A - Applicant Identification and Dispensary Information

(Scoring Method: Pass/Fail)

For this part, the applicant is required to provide background and contact information for the business or individual applying for a dispensary permit, the primary dispensary location, along with any second or third dispensary locations that are being sought under the application.

Section 1 – Applicant Name, Address and Contact Information

Business or Individual Name and Principal Address

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

The SENTEL Group

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

TSG

Business Address: 143 Waterfront Street #203

City: Oxon Hill  
State: MD  
Zip Code: 20745

Phone: (571) 366-0815  
Fax: (702) 342-4337

Email: DOH REDACTION

✓ Primary Contact, or ☐ Registered Agent for this Application

Name: Russell Wright

DOH REDACTION

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: TSG

<table>
<thead>
<tr>
<th>Address</th>
<th>State</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>1241 Peters Mountain Road</td>
<td>PA</td>
<td>17018</td>
</tr>
</tbody>
</table>

**City:** Dauphin  
**County:** Dauphin  
**Municipality:** Middle Paxton Twnshp

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

1241 Peters Mountain Road, Dauphin PA 17018 has excellent visibility on busy Peters Mountain Road just 2 miles off exit of Route 322/22 with average daily traffic count of approximately 11,000 vehicles. It is a centrally located warehouse and retail building located only 10 minutes North of Harrisburg, PA. It also has easy access to Route 322, 325, 283 443, I 81 and I 83, and the PA Turnpike.

In terms of public transportation, TSG will provide complimentary van service for patients to and from the dispensary to the Capital Area Transit location of 901 N Cameron St, Harrisburg, PA 17101. TSG will also provide complimentary van service for patients to and from any other public transportation point within the 20 mile vicinity of the proposed dispensary location. As such, the proposed location is easily visible and accessible by both private and public transportation.

### Second Dispensary Location

<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Address</th>
<th>State</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>TSG</td>
<td>3514 Trindle Road</td>
<td>PA</td>
<td>17011</td>
</tr>
</tbody>
</table>

**City:** Camp Hill  
**County:** Cumberland County  
**Municipality:** Hampden Township

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

3514 Trindle Road, Camp Hill, PA 17011 has excellent visibility on busy Trindle Road, with an average daily traffic count of approximately 15,000 vehicles. In terms of public transportation, the proposed dispensary location is accessible to and from other areas via the Capital Area Transit (CAT). The location is also just 1.3 miles from Route 11 Harrisburg Expressway. It also has easy access to Route 76, 81, 83 and the Harrisburg Expressway (all of which are within approximately the 5 mile radius of the location). As such, the property is highly visible and accessible by both private and public transportation.

### Third Dispensary Location

<table>
<thead>
<tr>
<th>Facility Name</th>
<th>Address</th>
<th>State</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>N/A</td>
<td>PA</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**City:** N/A  
**County:** N/A  
**Municipality:** N/A
PLEASE PROVIDE A DESCRIPTION OF THE PUBLIC ACCESS TO THE DISPENSARY LOCATION, INCLUDING ANY LOCAL PUBLIC TRANSPORTATION THAT MAY BE AVAILABLE:

Not applicable at this time.

Part B – Diversity Plan

(Scoring Method: 100 Points)

IN ACCORDANCE WITH SECTION 615 OF THE ACT (35 P.S. § 10231.615), AN APPLICANT SHALL INCLUDE WITH ITS APPLICATION A DIVERSITY PLAN THAT PROMOTES AND ENSURES THE INVOLVEMENT OF DIVERSE PARTICIPANTS AND DIVERSE GROUPS IN OWNERSHIP, MANAGEMENT, EMPLOYMENT, AND CONTRACTING OPPORTUNITIES. DIVERSE PARTICIPANTS INCLUDE A PERSON, INCLUDING A NATURAL PERSON; INDIVIDUALS FROM DIVERSE RACIAL, ETHNIC AND CULTURAL BACKGROUNDS AND COMMUNITIES; WOMEN; VETERANS; INDIVIDUALS WITH DISABILITIES; CORPORATION; PARTNERSHIP; ASSOCIATION; TRUST OR OTHER ENTITY; OR ANY COMBINATION THEREOF, WHO ARE SEEKING A PERMIT ISSUED BY THE DEPARTMENT OF HEALTH TO GROW AND PROCESS OR DISPENSE MEDICAL MARIJUANA. DIVERSE GROUPS INCLUDE THE FOLLOWING BUSINESSES THAT HAVE BEEN CERTIFIED BY A THIRD-PARTY CERTIFYING ORGANIZATION: A DISADVANTAGED BUSINESS, MINORITY-OWNED BUSINESS, AND WOMEN-OWNED BUSINESS AS THOSE TERMS ARE DEFINED IN 74 PA. C.S. § 303(b); AND A SERVICE-DISABLED VETERAN-OWNED SMALL BUSINESS OR VETERAN-OWNED SMALL BUSINESS AS THOSE TERMS ARE DEFINED IN 51 PA. C.S. § 9601.

Section 3 – Diversity Plan

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

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

DIVERSITY PLAN

IN NARRATIVE FORM BELOW, DESCRIBE A PLAN THAT ESTABLISHES A GOAL OF DIVERSITY IN OWNERSHIP, MANAGEMENT, EMPLOYMENT AND CONTRACTING TO ENSURE THAT DIVERSE PARTICIPANTS AND DIVERSE GROUPS ARE ACCORDERD 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.

Introduction
The Sentel Group’s (“TSG”) financial backer, president and CEO, Mr. Russell T. Wright, fully supports and is verifiably committed to promoting diverse participation in corporate ownership, management, employment, and contracting opportunities as demonstrated in his previous and current business organizations. All of Mr. Wright’s former and current business organizations (including TSG, Dimensions International, R&R Enterprises, Brilliant Engineering, and SENTEL Corporation) have always been and continue to remain 100% minority owned businesses. Also, all his former and current business organizations have maintained significantly diverse workforces since inception. For example, one of Mr. Wright’s current organizations, SENTEL Corporation (SENTEL), presently maintains a workforce of over 700 full time (W2 status) employees, and this workforce’s composition is currently comprised of 53% racial minorities (and has averaged 55% racial minority in the past 5 years), and 35% women employees. SENTEL’s full diversity profile is outlined in the chart below. This information is documented via SENTEL’s reporting processes, consistent with various requirements including International Standardization Organization (ISO) 9001:2008 and the Department of Labor Federal Contractor Annual reporting requirements (including the Department of Labor Annual Veteran Submission forms).

<table>
<thead>
<tr>
<th>SENTEL DIVERSITY STATUS</th>
<th>CURRENT ESTIMATED WORKFORCE %</th>
<th>ESTIMATED WORKFORCE % SINCE INCEPTION &amp;/$ OR IN PAST 5 YRS.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Women Employees</td>
<td>35%</td>
<td>34.6%</td>
</tr>
<tr>
<td>Minority Employees</td>
<td>53%</td>
<td>55%</td>
</tr>
<tr>
<td>Veteran Employees</td>
<td>20%</td>
<td>23%</td>
</tr>
</tbody>
</table>
SENTEL is also a 1996 graduate of the Federal Government’s Small Business Administration’s (SBA) 8(a) Business Development Program devised for small businesses including diverse, minority, and disadvantaged businesses. As such, Mr. Wright understands the unique challenges that diverse participants, groups, vendors, and subcontractors face.

In terms of subcontractor and vendor dollars provided to diverse groups, SENTEL has provided an average of 23% of its annual revenues, exceeding an average of $20M worth of its total work annually in the past 5 years alone, to diverse groups including minority, woman, veteran, disabled and disabled veteran owned businesses (this information is verifiable and is submitted to the federal government in each of SENTEL’s small business plans as part of all of its previous and current federal contracts).

An array of other companies that TSG’s owner, financial backer, and its senior management (including its Board of Advisors), have been responsible for creating, operating, and/or managing (including Dimensions International, R&R Enterprises, and Brilliant Engineering), have also all implemented and maintained successful diversity plans, whose goals both in terms of diverse participants and groups have all demonstratively been met and maintained. In terms of TSG specifically, TSG is registered as a certified Minority Business Enterprise (“MBE”) by the Capital Region Minority Supplier Development Council (“CRMSC”) and is 100% minority owned. In terms of management, TSG’s Cultivation/Processing Board of Advisors is currently comprised of 54% individuals that would fit one or more diversity criteria including gender and racial status (advisors are listed individually under the Business History/Ability section of this application).

With respect to employees, TSG has proposed 16 full time positions (including both prospective employees such as pharmacists with signed Letters of Intent, and current employees) and over 81% of these employees currently meet various diversity criteria. A brief synopsis of TSG’s diversity criteria, both in terms of management and workforce, is provided in the chart below.

<table>
<thead>
<tr>
<th>TSG</th>
<th>% of Diverse Participants/Owners</th>
<th>Diversity Criteria Documentation</th>
<th>Verifiable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ownership/Financial Backing, President/CEO</td>
<td>100%</td>
<td>Racial Minority</td>
<td>Yes, current Articles of Formation/Incorporation on file, available for review</td>
</tr>
<tr>
<td>Board of Advisors</td>
<td>56%</td>
<td>Veterans, Racial Minority, Women</td>
<td>Yes, list of Advisors provided in Business History/Ability Section of application</td>
</tr>
<tr>
<td>Current Vendor Agreements/Contracts</td>
<td>80%</td>
<td>Veteran, Disabled Veteran, Women, Racial Minorities</td>
<td>Yes, vendor agreements/contracts currently on file</td>
</tr>
<tr>
<td>Proposed Employees</td>
<td>67%</td>
<td>Veteran, Disabled Veteran, Racial Minorities, Women</td>
<td>Yes, Diversity Plan, Equal Employment Plan, and Affirmative Action Plan currently on file and submitted as part of application addendums reflecting current employee status. Additionally, designated QC/Ethics Manager and HR Manager currently on staff have recorded and generated reports on file regarding proposed employee status</td>
</tr>
</tbody>
</table>
Overview.
As part of its diversity plan, TSG has implemented significant, tried and tested processes to account for, record, audit, and report the participation level and involvement of various diverse participants and groups on an annual basis to ensure compliance with all internal corporate policies. These policies are consistent with industry standards (including ISO standards), and all applicable state and federal laws. Additionally, TSG will have all related documentation on file and available to the Department at all times, and will provide any other information the Department deems appropriate regarding ownership, management, employment, and contracting opportunities by diverse participants and groups at any time. Details of our Diversity Plan are provided below.

Diversity Plan Objective.
It is the policy of TSG not to discriminate against any employee or any applicant for employment because of age, race, religion, color, handicap, sex, physical condition, developmental disability, sexual orientation and/or national origin. This policy includes, but is not limited to, the following: recruitment and employment, promotion, demotion, transfer, compensation, selection for training including apprenticeship, layoff and termination. TSG further commits to take affirmative action to ensure equal employment opportunities.

Definitions.
Diverse Groups — A disadvantaged business, minority-owned business, women-owned business, service-disabled veteran-owned small business or veteran-owned small business that has been certified by a third-party certifying organization.
Diverse Participants — The term includes the following:
- Individuals from diverse racial, ethnic and cultural backgrounds and communities.
- Women.
- Veterans.
- Individuals with disabilities.

Diversity Plan — A strategy that promotes or ensures participation by diverse groups in the management and operation of a medical marijuana organization through contracting and employment opportunities.

Vision Statement.
Leveraging a diverse and inclusive workforce to achieve superior business results.

Goals.
The goal of TSG’s diversity plan is to establish a culture of opportunity and access in employment and contracting in our operations. TSG ensures it will meet the diversity goals outlined within the diversity plan. All personnel who are responsible for hiring and promoting
employees and for the development and implementation of programs or activities are charged to support this program and are trained accordingly. They also provide leadership in implementing affirmative action goals and initiatives.

During the term of permit with the Commonwealth of Pennsylvania, TSG shall comply with all state regulations and federal laws relating to equal employment opportunities and affirmative action and to continue to meet the goals of the diversity plan. The company shall continue to work cooperatively with government and community organizations to take affirmative action to ensure equal employment and advancement opportunities. TSG’s goal is to attract, develop and retain the best and brightest employees from varied backgrounds and ethnicities. This requires TSG to have a culture of inclusion where all individuals feel respected, are treated fairly and are provided an opportunity to excel within TSG. To achieve this, TSG will seek to ensure that all individuals within the company possess diversity and inclusion competencies.

1. The diversity status of the Principals, Operators, Financial Backers, and Employees of the Medical Marijuana Organization.
TSG is a extremely diverse organization and nearly 69% of its members meet various diversity status criteria. This includes TSG’s owner, principal, and financial backer, and many members of TSG’s senior and mid-level managers, operators and employees are either racial minorities, females, and/or veterans. Specifically, TSG’s participants currently consist of:

- Mr. Russell T. Wright, 100% Owner and 100% Financial Backer, diversity status: racial minority.
- Dr. Suzanne Sisley, Lead Medical Researcher, diversity status: female.
- Ms. Tatiana Joblokov, pharmacist, diversity status: female
- Ms. Cheryl J. Wilson, pharmacist, diversity status: female
- Mr. Rod Brodbeck, pharmacist, diversity status: N/A
- Mr. Mike Royer: Chief Financial Officer, diversity status: N/A
- Ms. Barbara Ochester, nurse, diversity status: female
- Ms. Colleen Wood, nurse, diversity status, female
- Mr. Thomas Haffly, master grower/horticulturist, diversity status: N/A
- Mr. Will Whitaker, facility manager, diversity status: racial minority, disabled veteran
- Ms Katara Hanson, Human Resources (HR) manager, diversity status: racial minority, female.
• Ms. Amina Garrett, recruiting and staffing lead; diversity status: female, racial minority, veteran.

• Ms. Rosario Garcia, QC/ethics and compliance manager; diversity status: female, racial minority.

• Ms. Bridget Spruill, business management director; diversity status: female, racial minority.

• Mr. David McCoy, security director; diversity status: N/A

Please note that the above reflects TSG’s current staff and Advisory Board members for both its grow/cultivation and dispensary operations in hopes of fulfilling TSG’s goals of becoming a vertically integrated business. However, the employees listed in the Personnel Qualifications portion of this application are those that will specifically work on TSG’s Grow/Processing Facility operations.

2. An official affirmative action plan for the Medical Marijuana Organization.
TSG recognizes the need for Affirmative Action Plan and pledges our commitment to undertake positive actions to overcome the present effects of past practices or barriers to equal employment opportunity and to achieve the full and fair participation of minorities, women, people with disabilities, elderly persons, and all other protected groups found to be underutilized in TSG’s work force or affected by policies having an adverse impact. TSG ensures its current Affirmative Action Plan (AAP), submitted in full as an addendum to this application, complies with all relevant Pennsylvania and federal anti-discrimination provisions, laws and regulations.

TSG’s current AAP is the policy of TSG to provide equal employment opportunities without consideration of race, color, religion, age, sex, marital status, national origin, genetic information, past/present history of mental disability, ancestry, learning or physical disabilities including but, not limited to blindness, sexual orientation, genetic information or criminal record, unless there is a bonfire occupational qualification for excluding persons in one of the above protected groups. This policy applies to all aspects of the employer/employee relationship including, but not limited to, recruitment, hiring, referrals, classifying, advertising, training, upgrading, promotion, benefits, compensation, discipline, layoff and terminations. TSG recognizes the hiring difficulties experienced by minorities, people with disabilities and by many elderly persons and, where appropriate, TSG has set goals to overcome the present effects of past discrimination, if any, to achieve the full and fair utilization of such persons in the work force. TSG further pledges that the company affirmatively provides services and programs in a fair and impartial manner. Where adverse impact is identified, TSG will:

• Review its personnel policies and procedures to ensure that barriers, which unnecessarily exclude protected classes and practices, which have an illegal discriminatory impact, are identified and eliminated;

• Explore alternative approaches to employ minorities and members of protected classes;
• administer all terms, conditions, privileges and benefits of the employment process in an equitable manner; and

• Establish procedures for the extra effort that may be necessary to ensure that the recruitment and hiring of protected group members reflect their availability in the job market.


As such, TSG has developed an Affirmative Action Policy Plan which currently includes the following:

• Acknowledges the purpose and need for affirmative action

• Lists all federal and state laws, regulations, guidelines and executive orders that prohibit or outlaw discrimination

• Lists all protected groups

• Pledges to use affirmative action at each step of the employment process

• Establishes and adopt affirmative action and equal employment opportunity as immediate and necessary objectives

• Pledges the entity to affirmatively provide services and programs in a fair and impartial manner

• Recognizes the hiring difficulties experienced by minorities, the physically disabled and by many older persons, and establish hiring and program goals for actions to overcome the present effects of past discrimination, if any, and to achieve the full and fair utilization of such persons in the workforce

• Provides for extensive evaluation, audits, and reports so as to ensure compliance with the plan’s objectives to maintain a diverse workforce

• Identifies the agency affirmative action person by name, position, and POC information

• The policy statement is signed by the agency head, dated

• It will be revised every annually and posted

• It will be disseminated annually to all employees
A full copy of both TSG’s AAP, along with its Equal Employment Opportunity Plan (EEOP) are provided as an additional attachments to this application and TSG’s policy statement is given annually to all TSG’s employees, and will also be posted throughout TSG’s offices.

The company will also expect each supplier, union, consultant and other entity(s) with which we do business to comply with all applicable Pennsylvania and Federal Equal Opportunity laws and regulations. TSG will not knowingly do business with any entity debarred from participation in any federal or state program or found to be in violation of any state or federal anti-discrimination law.

3. **Internal diversity goals adopted by the Medical Marijuana Organization.**
The internal diversity goals adopted by TSG include maintaining a proportionate number of diverse participants as part of the company’s full time workforce annually. This includes a workforce comprised at all times of no less than: 40% racial minorities, 30% women, 20% veterans, and 15% disabled veterans. TSG finds this goal to be highly attainable as these numbers were derived at by averaging all of TSG senior management’s former and current companies’ annual diversity statistics together (including SENTEL Corporation, Dimensions International, Brilliant Innovations, and Flight Explorer), in addition to incorporating TSG’s current and prospective employee pool into the equation.

Additional internal diversity goals also include allocating no less than 20% of the business’ annual work/revenues to various diverse groups and in proportionate quantities, including to racial minority, woman, veteran and disabled veteran owned businesses. TSG finds this percentage to be highly attainable as these numbers were also derived at by using statistics from other current and former companies owned and operated by TSG’s senior management, along with the work TSG has already allocated to various vendors directly related to it Pennsylvania medical cannabis efforts.

4. **A plan for diversity-oriented outreach or events the Medical Marijuana Organization will conduct during the term of permit.**
TSG’s Board of Advisors Chairman, and owner Russell Wright’s father, Dr. Robert Wright, along with Ms. Bridget Spruill, TSG’s Business Management Director, are designated to provide oversite to TSG’s diversity-oriented outreach and event programs throughout TSG’s term of permit. Dr. Wright has over 30 years’ of community outreach experience ranging from developing and supporting legislation related to housing, recreation, employment, industrial development, and street and highway improvements in hub zones, and various other socially and economically repressed regions while serving three consecutive terms as a member of the Columbus, Georgia City Council.

He also served on the Board of Governors for the Joint Center for Political and Economic Studies, the Executive Leadership Cabinet for the Martin Luther King, Jr. National Memorial Project Foundation. He was also the former Chairman of the Presidential Commission for the National Museum of African American History and Culture in Washington, DC.
He is presently a member of several boards, including The Board of Directors of the Horatio Alger Association, which provides scholarships for need-based Americans facing adversity. In addition, he has been privileged to receive numerous awards and honors for his support of various diversity projects, the most recent being the 2014 Congressional Black Caucus Phoenix Award, presented to him in a ceremony where the keynote speaker was then President Obama, for his contributions and support towards providing minority leadership development and scholarship opportunities in various communities he conducted business in.

Ms. Spruill is currently working for TSG’s senior management full time and has been doing so for several years. Her community outreach related experience includes assisting The White House Office of Public Liaison with the creation and implementation of an African American Outreach Initiative plan for President George W. Bush. In her consultant capacity, she also provided administrative, management, and strategic consultation to the African American Leadership Committee, Humphrey International, Inc., and The George Washington University, Graduate School of Education and Human Development.

Under Dr. Wright’s and Ms. Spruill’s leadership, TSG has already reached out to various state and local organizations promoting divisery, ranging from the National Diversity Council (specifically regarding Healthcare Diversity Council and Pennsylvania Diversity Council opportunities) to the Multicultural Community Resource Center in Erie, Pennsylvania. TSG asserts that it will not only have members of TSG volunteer at these organizations and similar organizations’ events and programs on a regular basis (no less than every other month), but that it will also maintain a corporate partnership with these and other organization supporting
various projects via significant funding throughout TSG’s entire term of medical marijuana licensure with the Commonwealth of Pennsylvania.

5. Contracts with diverse groups and the expected percentage and dollar amount of revenues that will be paid to the diverse group.

TSG’s Advisory Board Chairman, Dr. Wright, has extensive experience with identifying and ensuring partnerships with diverse groups, vendors, and subcontractors. Dr. Wright was appointed by President Reagan to the position of Associate Administrator for Minority Small Business at the U.S. Small Business Administration, where he managed the office of Minority Small Business/Capital Ownership Development (MSB/COD) to foster business ownership and to promote competitive viability of eligible socially and economically disadvantaged businesses. He managed all activities involving three principal program elements: the 8(a) program; the 7(j) program; and the Capital Ownership Development Program. He made final decisions on all firms entering, completing, and graduating from the program and frequently interacted with members of Congress and White House personnel in formulating new policies and procedures.

Additionally, Ms. Bridget Spruill, also currently serves as the Director of Small and Disadvantaged Business Development for several of TSG senior management’s other businesses as well. Ms. Spruill has served in this role for nearly a decade, and has not only been responsible for establishing and maintaining relationships and partnerships with diverse businesses across the nation, but has also served as one of the key contributors in terms of ensuring that all of TSG senior management’s organizations meet their corporate and government vendor and subcontractor diversity requirements fully.

Under Dr. Wright and Ms. Spruill’s leadership, TSG has already secured vendor contracts and agreements with an array of diverse groups, including:

- TechOpps, Inc.: 100% minority, woman owned company and graduate of the SBA’s 8(a) program. TechOpps is currently one of TSG’s primary security vendors for its Pennsylvania Medical Cannabis facilities. The dollar amount/annual revenues TechOpps, Inc. is anticipated to receive in assisting TSG with security support services is well over $100,000 the first year alone.

- E-House Executive Security Professionals: 100% minority owned business. E-House security is currently TSG’s prime security vendor for TSG’s Maryland medical cannabis dispensary facility. E-house is currently assisting TSG with an array of security support services (ranging from security site plans, SOPs, security systems installation and maintenance) needed to stand up its Maryland dispensary facility. E-House Executive Security Professionals will also be providing similar services for TSG’s Pennsylvania medical cannabis facilities. In doing so, the anticipated dollar amount E-House Security will receive for doing so is well over $100,000 the first year alone.

- Vantage, Associates LLC (“Vantage”): currently a 100% Economically Disadvantaged Woman Owned Small Business (EDWOSB) and meets the Federal Government Small
Vantage is also 100% veteran owned small business. Vantage is currently under contract with TSG as a vendor providing Pennsylvania medical cannabis permit application support services, including application writing, review, and staffing support services. Additionally, Vantage has been assisting TSG with Maryland medical cannabis application and dispensary facilities support services since March 15, 2015.

Specifically, the dollar amount/revenues that Vantage has already been provided for the past 2 years of services, including the medical cannabis support services listed above, currently already exceeds well over $225,000.

Further, TSG has retained the services of Vantage to provide Pennsylvania facilities support services throughout the duration of the implementation and operation of our facilities in Pennsylvania, at approximately $100,000 in services annually.

- RLO2: Service Disabled, Veteran Owned Small Business (“SDVOSB”). RLO2 has been under contract with Mr. Wright’s company for several years and has already been provided with well over $300,000 in the past two years alone providing logistics services, including facilities support services related work such as facility identification, planning, and advisement.

RL02 will be providing facilities support services, including assisting in the implementation and maintenance of TSG’s Pennsylvania medical cannabis facilities, and anticipated revenues provided to RLO2 are approximated to continue at well over $150,000 annually.

TSG is currently in contract with one other vendor, the American Cannabis Company (ACC) as a vendor for its Pennsylvania Medical Cannabis efforts. As such, 80% of TSG’s current vendors on this effort meet various diversity criteria, as is demonstrated above. Consequently, TSG anticipates that well over 50% of the aggregate annual funding that TSG provides to vendors on this effort will be given to diverse groups.

6. Any materials on the corporation’s mentoring, training, or professional development programs for diverse groups.

Ms. Katara Hanson, M.A., PHR, SHRM-CP, is TSG’s lead on diversity mentoring, training, and professional development programs. Ms. Hanson possesses a Masters of Art in HR Management from Marymount University, and a Graduate Certificate in Human Resources, Foundations of Employee Relations from Cornell University. She also possesses over 14 years of consecutive HR experience, and has worked as a fulltime HR manager for TSG’s senior management for the past four years. Her areas of specialization include diversity training and professional development programs. Her formal diversity training includes completing the Society for Human Resource Management (SHRM) Diversity & Inclusion Strategic Leadership Program. Ms. Hanson is also currently SHRM CP, Professional in Human Resources (PHR), SHRM HR Generalist, and SHRM Essentials of HR Management Certified. Ms. Hanson has put together a comprehensive diversity mentoring, training, and professional development program which includes the following:

- Employee Corporate Diversity Training and Training Quiz and Certificate, mandated corporate wide and annually.
The purchase of a Skillsoft license providing employees with over 2000 training courses and extensive diversity training courses, to include the following:

- “The Importance of Diversity and the Changing Workplace”
- “Diversity and You”
- “Understanding Workplace Diversity” (samples of material from TSG’s Skillsoft training are provided below).
- Employee e-portal with access to additional diversity resources including US Office of Personnel Management (OPM) including at the manager’s level such as “Manager’s Guide to Diversity, Inclusion, and Accommodation” and at the employee level such as “Workplace Diversity Awareness”
7. Any other information that demonstrates the Medical Marijuana Organization’s commitment to diverse practices.
TSG is a 100% minority owned business, with 81% diverse staff, an advisory board chairman who is of minority racial origin, an advisory board that is 54% diverse. Additionally, 80% of the companies TSG has current contracts with for its Pennsylvania medical cannabis support services meet various diversity criteria. Additionally, TSG’s staff, including its owner, its advisory chairman, its business management director, its HR manager, Ethics and Compliance manager and staffing/recruiting lead not only have extensive experience in maintaining a diverse staff, but are also have significant formal diversity training. TSG has also fully developed its AAP and EO plans (attached to this application as addendums), as well fully developed diversity training programs, based on well established, tried and tested industry and corporate standards. All of these factors contribute to fully assuring that TSG continues exceeding in the promotion of various diverse groups.

8. A workforce utilization report including the following information for each job category within the Medical Marijuana Organization
In terms of TSG’s current workforce (this includes both the contracted employees such as the pharmacists and nurses and current employees), out of the 19 positions proposed, nearly 69% of participants currently meet diversity requirements in various categories, as is depicted in the workforce utilization report below.

<table>
<thead>
<tr>
<th>Job Category</th>
<th>(a) Total Number of Current Employees</th>
<th>(b) Men</th>
<th>(c) Women</th>
<th>(d) Veterans</th>
<th>(e) Service Disabled Veterans</th>
<th>(f) Racial Minorities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owner/CEO</td>
<td>1</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>Pharmacists</td>
<td>4</td>
<td>1</td>
<td>2</td>
<td>-</td>
<td>-</td>
<td>0</td>
</tr>
<tr>
<td>Chief Financial Officer</td>
<td>1</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Medical Researcher and Director</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Nurses (RNs)</td>
<td>2</td>
<td>-</td>
<td>2</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Master Grower/ Horticulturist</td>
<td>1</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Security Director</td>
<td>1</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Business Management Director</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Facility Manager</td>
<td>1</td>
<td>1</td>
<td>-</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>
9. A narrative description of ability to record and report on components of diversity plan.

In terms of TSG’s ability to record and report the components of the diversity plan, including the types of records that will be maintained concerning procedures adopted to comply with the requirements and goals in the plan, TSG has leveraged its parent/affiliate companies’ ISO 9001:2008, 9001:2015, and CMMi Level 2 certifications and Level 3 processes to implement streamlined recording and reporting processes. Additionally, Ms. Rosario Garcia serves as TSG’s Quality Control (QC)/Ethics and Compliance Manager and leads TSG’s recording, auditing, and reporting efforts. Ms. Garcia is a quality assurance, compliance, assurance, and audit specialist, with credentials including ISO 9001:2008 Lead Auditor (TPECS) Certification, ISO 9001:2015 TPECS v2.0 Certification, and CMMI Level 2 and Level 3 Appraisal Team Member status from the Software Engineering Institute. She also possesses over 13 years of consecutive experience in the field, including experience recording, auditing, and reporting on various components of corporate Quality Management Systems (QMS), including corporate Diversity Plans and AAPs. Ms. Garcia has spent the last eight years working as a fulltime QC Director/Diversity Management employee for TSG’s senior management, where she successfully completed both registration and surveillance ISO 9001:2008 internal and external audits with outstanding results including four audits with zero nonconformities identified. While working for TSG’s senior management, the programs she assisted TSG’s senior management with were also awarded Ethisphere’s “Best Overall Ethics Programs” including #2 Best Small Company Ethics Programs and #4 Best Private Company Ethics Programs.

As part of TSG’s diversity plan reporting and recording processes, Ms. Garcia has led TSG to implement the same ISO compliant processes that Mr. Wright has implemented for his other organizations, including SENTEL, which is ISO Certified. This ensures TSG with a streamlined recording, audit, and reporting approach which will enable the continual improvement processes that the senior management has set up for its other current and previous businesses. Some of the steps in the process are depicted below:

1) All components of TSG’s Diversity Plan, including related documents, plans, and policies such as TSG’s AAP and Policy, and its EEOP are reviewed, recorded, and reported in writing annually, by Ms. Garcia. This is to ensure they are compliant with applicable laws and regulations, and that all stated procedures and guidelines are being implemented throughout the company’s recruiting and personnel processes to ensure all employees and candidates for employment are provided equal opportunities without regard to race, color, religion, ethnicity, sex (including pregnancy and gender identity), sexual orientation, age, parental status,
disability, marital status, family medical history or genetic information, political affiliation, military service or status, or any other basis prohibited by applicable law.

2) In evaluating and reporting on TSG’s Diversity Plan, TSG will ensure all documents are in conformity the most current version of all applicable regulations, including with Executive Order 11246, and provide guidance to management with respect to the company’s commitment and full implementation of its EEOP and AAP.

3) Additionally, TSG HR Director and EEO Coordinator, Ms. Katara Hanson, has the overall responsibility of annually updating the Diversity Plan, implementing affirmative action activities, and recording and producing reports, including reports specifically measuring the effectiveness of the TSG’s Diversity Plan, AAP, and EEOP, indicating any need for remedial actions, determining the degree to which our objectives have been attained and measure overall compliance with each plan’s specific obligations.

4) The Diversity Plan is then annually presented to the TSG President/CEO and to the Advisory Board for review and comment and retained in accordance with our standardized control of records procedure. The Diversity Plan, absent the data metrics, is available to any employee or applicant for employment for inspection upon request.

5) We will conduct annual internal audits to monitor compliance with our Diversity Plan policies, record this information and provide internal audit reports to senior management including any corrective actions taken or areas of weakness identified.

Part C – Applicant Background Information

(Scoring Method: Pass/Fail)

FOR THIS PART THE APPLICANT IS REQUIRED TO PROVIDE BACKGROUND AND CONTACT INFORMATION FOR THE PRINCIPALS, FINANCIAL BACKERS, OPERATORS AND EMPLOYEES.

Section 4 – Principals, Financial Backers, Operators and Employees

A. Please list all Principals, Financial Backers and Operators

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name: Russell</td>
</tr>
<tr>
<td>Occupation: Owner</td>
</tr>
<tr>
<td>Also known as: Russ</td>
</tr>
</tbody>
</table>

DOH REDACTION

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

<table>
<thead>
<tr>
<th>First Name: N/A</th>
<th>Middle Name: N/A</th>
<th>Last Name: N/A</th>
<th>Suffix: N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Occupation:</td>
<td>Title in the applicant’s business: N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Also known as:</td>
<td>Date of birth: N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address Line 1: N/A</td>
<td>Address Line 2: N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address Line 3: N/A</td>
<td>City: N/A</td>
<td>State: N/A</td>
<td>Zip Code: N/A</td>
</tr>
<tr>
<td>Phone: N/A</td>
<td>Fax: N/A</td>
<td>Email: N/A</td>
<td></td>
</tr>
</tbody>
</table>

### Name and Residential Address

<table>
<thead>
<tr>
<th>First Name: N/A</th>
<th>Middle Name: N/A</th>
<th>Last Name: N/A</th>
<th>Suffix: N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Occupation:</td>
<td>Title in the applicant’s business: N/A</td>
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<td></td>
</tr>
<tr>
<td>Also known as:</td>
<td>Date of birth: N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address Line 1: N/A</td>
<td>Address Line 2: N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address Line 3: N/A</td>
<td>City: N/A</td>
<td>State: N/A</td>
<td>Zip Code: N/A</td>
</tr>
<tr>
<td>Phone: N/A</td>
<td>Fax: N/A</td>
<td>Email: N/A</td>
<td></td>
</tr>
</tbody>
</table>

### Name and Residential Address

<table>
<thead>
<tr>
<th>First Name: N/A</th>
<th>Middle Name: N/A</th>
<th>Last Name: N/A</th>
<th>Suffix: N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Occupation:</td>
<td>Title in the applicant’s business: N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Also known as:</td>
<td>Date of birth: N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address Line 1: N/A</td>
<td>Address Line 2: N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address Line 3: N/A</td>
<td>City: N/A</td>
<td>State: N/A</td>
<td>Zip Code: N/A</td>
</tr>
<tr>
<td>Phone: N/A</td>
<td>Fax: N/A</td>
<td>Email: N/A</td>
<td></td>
</tr>
</tbody>
</table>

### Name and Residential Address

<table>
<thead>
<tr>
<th>First Name: N/A</th>
<th>Middle Name: N/A</th>
<th>Last Name: N/A</th>
<th>Suffix: N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Occupation:</td>
<td>Title in the applicant’s business: N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Also known as:</td>
<td>Date of birth: N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address Line 1: N/A</td>
<td>Address Line 2: N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address Line 3: N/A</td>
<td>City: N/A</td>
<td>State: N/A</td>
<td>Zip Code: N/A</td>
</tr>
<tr>
<td>Phone: N/A</td>
<td>Fax: N/A</td>
<td>Email: N/A</td>
<td></td>
</tr>
</tbody>
</table>

If more space is required, please submit additional information on other individuals in a separate document titled “Principals, Financial Backers and Operators (Cont’d.)” in accordance with the attachment file name format requirements and include it with the attachments.
B. Please list Employees

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

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name: Tatiana</td>
<td>Middle Name:</td>
</tr>
<tr>
<td>Occupation: Pennsylvania Registered Pharmacist</td>
<td>Title in the applicant’s business: Pharmacist</td>
</tr>
<tr>
<td>Also known as:</td>
<td>Date of birth:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name: Colleen</td>
<td>Middle Name:</td>
</tr>
<tr>
<td>Occupation: Pennsylvania Registered Nurse, TMCI Global/The Medical Cannabis Institute, Medical Cannabis Association Certified, Member, American Cannabis Nurses Association</td>
<td>Title in the applicant’s business: PA Registered Nurse</td>
</tr>
<tr>
<td>Also known as:</td>
<td>Date of birth:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name: Ronald</td>
<td>Middle Name: E.</td>
</tr>
<tr>
<td>Occupation: RPh. Pharmacist in Charge with 30 years experience as a Registered Pharmacist</td>
<td>Title in the applicant’s business: PA Pharmacist</td>
</tr>
<tr>
<td>Also known as:</td>
<td>Date of birth:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name: Cheryl</td>
<td>Middle Name: L.</td>
</tr>
<tr>
<td>Occupation: PharmD. Clinical Pharmacist and Pharmacy Manager. Medication Compounding Expert.</td>
<td>Title in the applicant’s business: PA Registered Pharmacist</td>
</tr>
<tr>
<td>Also known as:</td>
<td>Date of birth:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name: Barbara</td>
<td>Middle Name:</td>
</tr>
<tr>
<td>Occupation: American Cannabis Nurse’s Association Director. Clinical Care Manager. Professor of Nursing</td>
<td>Title in the applicant’s business:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address Line 1</th>
<th>Address Line 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
DOH REDACTION

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

Section 5 – Moral Affirmation

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

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

<table>
<thead>
<tr>
<th>Civil and Administrative Action</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>The applicant has never responded to an action resulting in sanctions, disciplinary actions or</td>
<td></td>
<td></td>
</tr>
<tr>
<td>civil monetary penalties being imposed relating to a registration, license, permit or any other</td>
<td></td>
<td></td>
</tr>
<tr>
<td>authorization to grow, process or dispense medical marijuana in any state.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The applicant has never responded to a civil or administrative action relating to a registration,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>license, permit or authorization to grow, process or dispense medical marijuana in any state.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The applicant has never been accused of obtaining a registration, license, permit or other</td>
<td></td>
<td></td>
</tr>
<tr>
<td>authorization to operate as a grower, processor or dispensary of medical marijuana in any</td>
<td></td>
<td></td>
</tr>
<tr>
<td>jurisdiction by fraud, misrepresentation, or the submission of false information.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No civil or administrative action has been taken against the applicant under the laws of the</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commonwealth or any other state, the United States or a military, territorial or tribal</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Part D – Plan of Operation

(Scoring Method: 550 Points)

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

Plan of Operation

What must be covered in a Plan of Operation?
Applicants must identify how they will comply with relevant laws and regulations regarding:

- Security and Surveillance
- Employee qualifications and training
- Transportation of medical marijuana and medical marijuana products
- Storage of medical marijuana products
- Inventory management
- Recordkeeping
- Prevention of unlawful diversion of medical marijuana and medical marijuana products
- A timetable outlining the steps required for the applicant to become operational within six months from the date of issuance of a dispensary permit

By checking “Yes,” you affirm that you are able to continuously maintain effective security, surveillance and accounting control measures to prevent diversion, abuse and other illegal conduct regarding medical marijuana and medical marijuana products.
Section 8 – Operational Timetable

<table>
<thead>
<tr>
<th>Activity</th>
<th>Estimated Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dispensary Permit issued by the Department of Health</td>
<td>7/3/2017</td>
</tr>
<tr>
<td>Construction on dispensary facility begins</td>
<td>7/17/2017</td>
</tr>
<tr>
<td>Construction of dispensary facility complete</td>
<td>11/18/2017</td>
</tr>
<tr>
<td>Employee education and training begin</td>
<td>11/23/2017</td>
</tr>
<tr>
<td>Employee education and training complete</td>
<td>11/30/2017</td>
</tr>
<tr>
<td>Department of Health operational inspection</td>
<td>12/2/2017</td>
</tr>
<tr>
<td>Receive Operational License from the Department of Health and begin dispensary operations</td>
<td>12/3/2017</td>
</tr>
</tbody>
</table>

If more space is required for the Operational Timetable, please submit additional information in a separate document titled “Operational Timetable (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 backer, operator and employee.

1. Mr. Russell T. Wright, MBA—Owner, President and CEO: As the owner, president, and CEO of TSG Mr. Russell Wright intends to fully commit himself to managing TSG’s PA operations. In doing so, his responsibilities and duties will include providing oversight to all staff members and employees of the organization; meeting with board of advisors and other executives to determine if TSG is operating in accordance with goals and policies; overseeing budgets; promoting economic development within surrounding communities; directing the organization’s financial goals, objectives, and budgets; implementing TSG’s guidelines on a day-to-day basis; presiding over quality control; encouraging business investment; developing and implementing strategies and setting the overall direction TSG, overseeing the investment of funds and managing associated risks, supervising cash management activities; executing capital-raising strategies to support
TSG’s expansion, developing and maintain relationships with other associations, industry, and government officials that are in the best interest of TSG, and directing staff, including organizational structure, professional development, motivation, performance evaluation, discipline, compensation, personnel policies, and procedures.

2. **Susanne Sisley, M.D.—Dispensary Medical Director, Cultivation/Processing Lead Medical Advisor:** Dr. Sisley’s duties and responsibilities as TSG’s PA Medical Cannabis Dispensary Medical Director include, but are not limited to developing and providing training to the dispensary’s dispensary agents at least once annually, from the initial date of the dispensary’s registration certificate on the following subjects: Guidelines for providing information to qualifying patients related to risks, benefits, and side effects associated with medical marijuana; Guidelines for providing support to qualifying patients related to the qualifying patient’s self-assessment of the qualifying patient’s symptoms, including a rating scale for pain, nausea, cachexia or wasting syndrome, muscle spasms, nausea, and agitation; Recognizing signs and symptoms of substance abuse; and Guidelines for refusing to provide medical marijuana to an individual who appears to be impaired or abusing medical marijuana; and assisting in the development and implementation of review and improvement processes for patient education and support provided by the dispensary. Providing oversight for the development and dissemination of: Educational materials for qualifying patients and designated caregivers that include: Alternative medical options for the qualifying patient’s debilitating medical condition; Information about possible side effects of and contraindications for medical marijuana including possible impairment with use and operation of a motor vehicle or heavy machinery, when caring for children, or of job performance; Guidelines for notifying the physician who provided the written certification for medical marijuana if side effects or contraindications occur; a description of the potential for differing strengths of medical marijuana strains and products; Information about potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, non-prescription drugs, and supplements; Techniques for the use of medical marijuana and marijuana paraphernalia; Information about different methods, forms, and routes of medical marijuana administration; Signs and symptoms of substance abuse, including tolerance, dependency, and withdrawal; and a listing of substance abuse programs and referral information. A system for a qualifying patient or the qualifying patient’s designated caregiver to document the qualifying patient’s pain, cachexia or wasting syndrome, nausea, seizures, muscle spasms, or agitation that includes: a log book, maintained by the qualifying patient and or the qualifying patient’s designated caregiver, in which the qualifying patient or the qualifying patient’s designated caregiver may track the use and effects of specific medical marijuana strains and products; a rating scale for pain, cachexia or wasting syndrome, nausea, seizures, muscles spasms, and agitation; Guidelines for the qualifying patient’s self-assessment or, if applicable, assessment of the qualifying patient by the qualifying patient’s designated caregiver; and guidelines for reporting usage and symptoms to the physician providing the written certification for medical marijuana and any other treating
physicians; and policies and procedures for refusing to provide medical marijuana to an individual who appears to be impaired or abusing medical marijuana.

3. **Barbara Ochester, R.N., M.S.N.—Dispensary Nurse and Community Outreach Lead:**
   The Dispensary Nurse’s duties and responsibilities include ensuring that clients/patients receive quality, timely, professional services in accordance with Clinic’s mission and values; Under the supervision of Pharmacist, fill prescriptions including generating computerized labels, counting, and dispensing medications. Providing consultation to patients or their authorized agents regarding prescriptions or medical information contained in the written physician order. Managing inventories including purchasing/receiving prescription drugs and soliciting samples/donations according to internal policies and procedures. Coordinating Patient Assistance Programs (PAP) including processing applications on behalf of patients. Ensuring that the dispensary is kept organized at all time. Answering dispensary phone; forward clinical inquiries to the proper/designated clinical staff. Initiating update of pharmacy software program whenever necessary. Participating in Quality Assurance/Quality Improvement programs and serve as liaison with outside pharmacies as needed. Handling patient information with utmost respect and confidentiality according to various regulations and Clinic policies and procedures. Handling patients’ complaints or concerns in a professional manner. Refer patient to appropriate management staff for handling or resolution of issues. Maintaining a professional, friendly, and courteous attitude in the performance of the duties. Managing inventory including: ordering medications as per pharmacy guidelines and within budget allocated. Stocking medications accurately. Inventory check whenever required. Solicit samples from pharmaceutical companies. Complying with all CA State Board of Pharmacy regulations, including those specific to clinic dispensary setting. Complying with all internal pharmacy policies and procedures. Ensuring that shelves are stocked with valid medications (not expired) and supporting the Clinic’s mission of quality care and patient satisfaction.

   TSG’s Community Outreach Lead will work to engage and educate the community about TSG and its goals. This role serves as the primary point of contact and organizer of volunteers for TSG. The responsibilities also include designing, organizing, and implementing various community events. In addition, these responsibilities, the Community Outreach Lead will also act as a liaison with community partners to further TSG’s goals for community and volunteer education. Duties will include, but are not limited to working with TSG leadership to further develop, implement, and maintain a comprehensive and innovative community outreach plan targeting individual, private, corporate, school and other organizations. Researching, identifying, evaluating, and working with new potential foundations, individuals, schools, establishments, and other organization partners that TSG can contribute to, volunteer with, and/or participate in fundraising for. Developing, implementing, and managing various TSG events within the community. Researching and assisting in developing plans for expanding TSG’s community presence. Serving as an ambassador of the mission of TSG in the interaction
with current and potential partners and the media. Creating and submitting applicable reports to TSG senior management and board of advisors.

4. **Dr. Cheryl Judge-Wilson PharmD—Dispensary Pharmacist:** TSG’s Dispensary pharmacist is responsible for the management and supervision of the medical TSG’s medical cannabis dispensary. In doing so, TSG’s dispensary pharmacist will maintain compliance with all PA regulations, inventory management, security and record keeping procedures; he/she will process provider recommendations for medical cannabis in an accurate and timely manner; he/she will counsel, answers patient inquiries and educate patients on medical cannabis. The pharmacist is responsible for safe and efficient methods for coordination of established pharmacy policy concerning drug patient care and will provide clinical drug information to meet the needs of TSG’s patients. Duties and Responsibilities include maintaining operations by initiating, coordinating, and enforcing program, operational, and personnel policies and procedures. Providing outstanding patient care. Completing store operational requirements. Participating in in-service education programs. Being well versed in and executing all company Standard Operating Procedures (SOPs). Understanding and following all PA medical cannabis regulations. Managing patient flow and activity on the premises. Dispensing medication to outpatients in accordance with TSG’s policy and in conformance with regulations and laws dealing with the class of prescription; counseling patients with regards to their medications and maintaining accurate, and up-to-date patient profiles. Maintaining necessary controls with respect to audited controlled inventory. Evaluating floor stock supply and ensures appropriateness of medication storage in conformance with regulatory agency and established company policies. Requesting additional inventory prior to running out. Supervising prepacking of drugs and control procedures. Maintaining a positive and instructional interaction with internal and external customers and employees. Verifying the work performed by support personnel, which includes patient drug data entry, and unit-dose drug distribution. Maintaining up-to-date knowledge of the profession by participating in organization memberships; by attending meetings, lectures, in-services, and seminars; by reading journals; and by complying with National Standards of Continuing Education to maintain professional competency and proficiency. Ensuring that the quality of professional services is maintained. Maintaining the stability and reputation of the TSG brand and store by complying with all applicable PA and federal legal requirements. Providing employees and patients with a safe and clean store environment.

5. **Ron Brodbeck, RPh—Dispensary Pharmacist:** TSG’s Dispensary pharmacist is responsible for the management and supervision of the medical TSG’s medical cannabis dispensary. In doing so, TSG’s dispensary pharmacist will maintain compliance with all PA regulations, inventory management, security and record keeping procedures; he/she will process provider recommendations for medical cannabis in an accurate and timely manner; he/she will counsel, answers patient inquiries and educate patients on medical cannabis. The pharmacist is responsible for safe and efficient methods for coordination of established pharmacy policy concerning drug patient care and will provide clinical drug information to meet the needs of TSG’s patients. Duties and Responsibilities include
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6. **Ms. Tatiana Jablokov, RPh—Dispensary Pharmacist:** TSG’s Dispensary pharmacist is responsible for the management and supervision of the medical TSG’s medical cannabis dispensary. In doing so, TSG’s dispensary pharmacist will maintain compliance with all PA regulations, inventory management, security and record keeping procedures; he/she will process provider recommendations for medical cannabis in an accurate and timely manner; he/she will counsel, answers patient inquiries and educate patients on medical cannabis. The pharmacist is responsible for safe and efficient methods for coordination of established pharmacy policy concerning drug patient care and will provide clinical drug information to meet the needs of TSG’s patients. Duties and Responsibilities include maintaining operations by initiating, coordinating, and enforcing program, operational, and personnel policies and procedures. Providing outstanding patient care. Completing store operational requirements. Participating in in-service education programs. Being well versed in and executing all company standard operating procedures. Understanding and following all PA medical cannabis regulations. Managing patient flow and activity on the premises. Dispensing medication to outpatients in accordance with TSG’s policy and in conformance with regulations and laws dealing with the class of prescription; counseling patients with regards to their medications and maintaining accurate, and up-to-date patient profiles. Maintaining necessary controls with respect to audited controlled inventory. Evaluating floor stock supply and ensures appropriateness of medication storage in conformance with regulatory agency and established company policies. Requesting
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7. **Ms. Colleen Harrington Wood—Dispensary Nurse:** The Dispensary Nurse’s duties and responsibilities include ensuring that clients/patients receive quality, timely, professional services in accordance with Clinic’s mission and values; Under the supervision of Pharmacist, fill prescriptions including generating computerized labels, counting, and dispensing medications. Providing consultation to patients or their authorized agents regarding prescriptions or medical information contained in the written physician order. Managing inventories including purchasing/receiving prescription drugs and soliciting samples/donations according to internal policies and procedures. Coordinating Patient Assistance Programs (PAP) including processing applications on behalf of patients. Ensuring that the dispensary is kept organized at all time. Answering dispensary phone; forward clinical inquiries to the proper/designated clinical staff. Initiating update of pharmacy software program whenever necessary. Participating in Quality Assurance/Quality Improvement programs and serve as liaison with outside pharmacies as needed. Handling patient information with utmost respect and confidentiality according to various regulations and Clinic policies and procedures. Handling patients’ complaints or concerns in a professional manner. Refer patient to appropriate management staff for handling or resolution of issues. Maintaining a professional, friendly, and courteous attitude in the performance of the duties. Managing inventory including: ordering medications as per pharmacy guidelines and within budget allocated. Stocking medications accurately. Inventory check whenever required. Solicit samples from pharmaceutical companies. Complying with all CA State Board of Pharmacy regulations, including those specific to clinic dispensary setting. Complying with all internal pharmacy policies and procedures. Ensuring that shelves are stocked with valid medications (not expired) and supporting the Clinic’s mission of quality care and patient satisfaction.

8. **Mr. Michael W. Roye, CPA—Chief Financial Officer:** This position’s roles, duties and responsibilities include planning, developing, organizing, implementing, directing, managing, and maintaining TSG's fiscal function and performance; participating in the development of TSG's plans and programs as a strategic partner; evaluating and advising on the impact of long range planning, introduction of new programs/strategies and regulatory action; enhancing and/or developing, implementing and enforcing TSG policies and procedures by way of systems that will improve the overall operation and
effectiveness of the corporation; establishing credibility throughout TSG’s organization by
developing and implementing effective financial solutions to business challenges;
providing technical financial advice and knowledge to others within the financial
discipline; continual improvement of the budgeting process through education of staff on
financial issues impacting to company; providing strategic financial input and leadership
on decision making issues affecting the organization; optimizing the handling of bank and
deposit relationships and initiate appropriate strategies to enhance cash position;
developing a reliable cash flow projection process and reporting mechanism that includes
minimum cash threshold to meet operating needs; serving as financial advisor on any
contracts into which TSG may enter; evaluating the finance division structure and team
plan for continual improvement of the efficiency and effectiveness of the group; and
developing credibility for the finance group by providing timely and accurate analysis of
budgets, financial reports and financial trends in order to assist the CEO/President.

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

1. Mr. Russell T. Wright, MBA—Owner, President and CEO: Mr. Wright is also
currently Chairman of R&R Enterprises, LLC; and the Chairman and CEO of SENTEL
Corporation, whose annual revenues averaged $50,000,000.00 from 2010-2014, and
exceeded $100,000,000 in 2016. He also served as Former Chairman and CEO of
Dimensions International, Inc., which was acquired by Honeywell Technologies in 2007
for $230,000,000.00 (please see http://www.blackenterprise.com/mag/dimensions-
international-acquired/). Mr Wright is also current CEO of Brilliant Engineering, and
former Co-Chairman of WC Holdings, Inc.

Mr. Wright is a recognized technology leader and his experience with successful
businesses also included his inception and execution of innovative business plans while
serving as former Vice President of Honeywell Technology Solutions, Inc. (HTSI), a
wholly owned subsidiary within Honeywell Aerospace serving the space, military and
commercial aviation markets. Mr. Wright led the HTSI business that provided space,
networks and communications support, logistics and engineering services to the
Department of Defense and federal civilian customers. Mr. Wright has the demonstrated
ability and experience of creating and applying effective and efficient business plans which
have led to business success time and time again.

Mr. Wright’s additional demonstrated ability to execute successful business plans is
evident in the fact that he has managed more than $1 billion in combined revenues for his
businesses and has successfully provided direct oversite of and managed over 2,500
employees over the past 27 years.

Mr. Wright holds a B.A. in Business Management from Morehouse College in Atlanta and
a Masters in Business Administration and Project Management from the Keller Graduate
School. He also holds a Masters Certificate in Government Contracting from the George
Washington University School of Business and Public Management. In addition, Mr.
2. **Susanne Sisley, M.D.—Dispensary Medical Director, Cultivation/Processing Lead Medical Advisor:** Dr. Suzanne Sisley is a renowned researcher in the field of medical cannabis. Her experience includes currently serving as a Principal Investigator in the nation’s only FDA-Approved Investigation with regards to the safety and efficacy of medical marijuana in veterans with chronic, treatment-resistant posttraumatic stress disorder. Dr. Sisley has served in this role for the past 7 years. Dr. Sisley also has over 20 years of medical experience, has served as the Program lead for the Arizona Medical Marijuana Physician Education Program (University of Arizona Grant Funded by the Arizona Department of Health Services), and has over 15 publications related to medical cannabis research.

Dr. Sisley’s current Federal Department of Agriculture (FDA) approved clinical trial evaluating the safety and efficacy of four different varieties of cannabis in the treatment of military veterans with PTSD was evaluated and approved by the University of Pennsylvania School of Medicine and the Department of Psychology. Her clinical trial is ongoing and will not be completed for another two and a half years. Dr. Sisley’s previous engagements also included serving as Internal Medicine/Psychiatry Faculty in St. Joseph’s Hospital and Medical Center, and as a member of the Internal Medicine and Psychiatry staff at the Veteran’s Affairs Medical Center.

Dr. Sisley holds her Doctor of Medicine from the University of Arizona and her Bachelor of Science from the Northern Arizona University. Dr. Suzanne Sisley has been retained by TSG as both TSG’s PA Medical Cannabis Dispensary Medical Director and as TSG’s Lead Medical Advisor for its Cultivation/Processing facilities.

3. **Barbara Ochester, R.N., M.S.N.—Dispensary Nurse and Community Outreach Lead:** Ms. Ochester currently serves as the American Cannabis Nurse’s Association (ACNA) Director and is a PA Registered Nurse. She currently serves as the Regional Clinical Care Manager for Universal Hospital Services. She also previously served Patient Care Solutions Specialist for the Universal Hospital Services, and as a Nurse Educator, for the Vaccine Business Unit of Glaxo, Smith, and Kleine Pharmaceutical Company. She has also served as an Assistant Professor at Montgomery Community College teaching Public Health, and Medical, Surgical and Intensive Care Nursing Leadership. Ms. Ochester hold her Masters of Science in Nursing/Public Health/Community Nursing from LaSalle University and did her Undergraduate work at both Cornell University and LaSalle University. Ms. Ochester is also highly active in volunteering in with various organizations including the Metropolitan Area Neighborhood Nutrition Alliance (MANNA), providing meal and food services for terminally ill individuals in various PA communities.

4. **Dr. Cheryl Judge-Wilson PharmD—Dispensary Pharmacist:** Dr. Judge Wilson is a PA Registered Pharmacist with both hospital and retail pharmacy experience. She is also a medication compounding expert. Ms. Judge-Wilson possesses a strong clinical background and her specializations include pharmacy management, patient care and interaction, and
patient counseling. She has a broad range of pharmaceutical experience ranging from serving as a Pharmacy manager for BioScrip to serving as a Clinical Pharmacist at Geisinger during which time, she delivered high standards of pharmaceutical care to a diverse group of clients. Her experience in the field includes management of out-patient infusion and parental therapy; collaborating with other health care professionals to plan, change, monitor, review, or evaluate the quality or effectiveness of drugs or drug regimens; providing advice on drug applications or characteristics, and managing and coordinating all departments including pharmacy, nursing, reimbursement, warehouse, and delivery of medications. Dr. Judge-Wilson holds her Doctorate of Pharmacy from Wilkes University and her Bachelors in Marketing and Management from Penn. State University.

5. **Ron Brodbeck, RPh—Dispensary Pharmacist:** Mr. Brodbeck has over 30+ years of experience as a PA registered Pharmacist. His experience includes retail, long term care, institutional, mail order and wholesale. He also possesses extensive experience in hiring, training, and mentoring pharmacy personnel and in creating and enforcing pharmacy policies and procedures. He is also well versed in navigating proprietary computer applications and various pharmacy benefits management systems. His experience ranges from serving as the Pharmacist in Charge at the Value Rx Pharmacy to serving as a Pharmacy Manager at CVS to working as Pharmacist at Walmart, Express Scripts, ME Wholesale Distribution, Mayfair Drug Service, and Philidor Rx Services in various locations in PA. Mr. Brodbeck has extensive experience with all facets of pharmacy management, including recruiting, training, and managing pharmacy staff; maintaining stocks; liaising with suppliers; and implementing infection-control regulations. He also possesses significant experience dispatching prescriptions by following SOPs for receiving, filling, logging, and maintaining loss prevention controls; ensuring that policies, Federal and Pennsylvania State laws and regulations are followed in all prescription-related issues, performing trouble shooting functions for third party discrepancies and other prescription filling issues and verifies that all required pharmacy, and ensuring that pharmacist and technician licenses/registrations are current and valid as required by State, Federal, and Company guidelines. Mr. Brodbeck holds his Bachelor of Science in Pharmacy from Temple University.

6. **Ms. Tatiana Jablokov, RPh—Dispensary Pharmacist:** Ms. Jablokov’s experience includes over 26+ years of experience as registered pharmacist in PA, including extensive experience as retail pharmacist at Rite Aid. She specializes in dispensing and compounding prescriptions; pharmacy management; patient care and medical dispensing; managing ancillary staff in medication dosage, drug interactions, medical equipment, disease management; potential side effects of prescriptions; directions for use; and maintaining accurate patient records per all applicable regulations. Ms. Jablokov holds her Bachelor of Science in Pharmacy from Temple University and is fluent in English, Russian, Ukrainian, German, and French.

7. **Ms. Colleen Harrington Wood—Dispensary Nurse:** With over 33+ year of experience as a registered Nurse, Ms. Wood, a PA Registered Nurse, started her nursing career as a
Staff Nurse in 1984 at the Albert Einstein Medical Center (including working in the Adult Cardiac Stepdown/Telemetry Unit, Pediatric Unit, Pediatric ICU, NICU and Outpatient Pediatric Clinic), followed by Schnieder Children's Hospital (level I, Trauma Center). Since that time, her positions have included serving as: a Clinical Coordinator at the Inpatient Pediatric Unit at Montgomery Hospital; a Clinical Resource Nurse at Doylestown Hospital; a Regulatory Writer and Consent Form Administrator at Kelly Scientific Resources; a Sr. Drug Safety Associate at Janssen, Pharmaceutical Companies of Johnson and Johnson; as a Drug Safety Specialist at Aerotek for Gilead Sciences; and as a Utilization Review Nurse at Independence Blue Cross. As such, Ms. Wood has an extensive and broad range of nursing experience including ICU, PCU, and NICU. Ms. Wood holds her Certification of Completion and Competency, Medical Cannabis Curriculum for Nurses from TMCI Global/ The Medical Cannabis Institute, is currently a member of the American Cannabis Nurse’s Association, and the Pennsylvania State Nurses Association. She received her Bachelor of Science in Nursing from Villanova.

8. **Mr. Michael W. Royer, CPA—Chief Financial Officer:** Mr. Royer is a Certified Public Account and he will be directing and managing TSG’s cultivation and processing facilities’ financial analysis, strategy, policy and reporting. He has over 27 years of professional experience as an account and prior to working for Mr. Russell Wright, he served in senior positions including as Chief Financial Officer and Vice President for an array of large companies including L-3 Communications. Mr. Royer has extensive experience establishing, formulating and evaluating corporate financial plans, goals and strategies and in establishing SOPs for economic modeling, financial reporting, and planning. He will be using his extensive experience to provide proactive leadership in developing and utilizing resources to drive and deliver financial and business growth to TSG’s cultivating and processing facilities operations. Mr. Royer’s expertise includes financial planning and strategy, managing profitability, strategic planning, providing vision, quality management, promoting process improvement, forecasting, corporate finance, and developing budgets.

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. In order to assure that each principal and employee meets the two-hour training requirement under the department as required by Section 1141.48 of the Act, TSG has implemented the following steps:
   1. TSG and Ms. Katara Hanson, TSG’s Training Lead, have incorporated the following policy into TSG’s Training Handbook: “Employees will complete industry related training, including training relevant to the responsibilities of principals and employees including proper handling of medical marijuana, proper recordkeeping and how to prevent and detect the diversion of medical marijuana. Additional training will include best practice security and safety procedures, including responding to the following: medical emergencies, fires,
chemical spills, and/or threatening events including armed robberies, burglaries, or a criminal incidents.”

2. TSG will also require all employees to complete separate, additional training and education developed by our retained regulated marijuana industry consultant, ACC. In operation since 2013, ACC has assisted clients in over 10 US markets and Canada. The founders also owned and operated a vertically integrated medical marijuana center in Colorado prior to founding the consulting company. ACC has applied this experience in developing its training materials and SOPs. Topics that will be covered in the training developed by ACC will include the following: Current Pennsylvania Laws and Regulations; training on the BioTrackTHC inventory control system; written SOPs; Pennsylvania Regulatory Compliance; Record Keeping and Documentation; General Security/Diversion Prevention Training; Perpetual Inventory Control Systems; Transport Manifest; OSHA Compliance; Environmental Control Systems; Employee Dress Code And Personal Hygiene; Facility Entry Protocol and Good Handling Practices; Limited Access Areas; Visitors; Daily Facility Evaluation; Receipt Of Material; Weights and Measurements and Scale Calibration; Inventory Reconciliation Procedure; Transferring/Transporting and Shipments; Customer Complaints and Returns; Product Recall; Cannabis Waste Disposal; Facility Cleaning and Sanitation; Equipment Operation; Equipment Maintenance, Cleaning and Sanitation; Facility Exit Protocol; and Loss Of Personnel.

3. TSG has also incorporated into its Employee Training Handbook that all employees will complete this training prior to taking on any TSG medical cannabis cultivating/processing related duties.

4. Each employee is provided with a TSG Employee Training Handbook during orientation, and must sign a Training Handbook Form indicating that they read, understood, and are willing to abide by TSG’s training policies and that not doing so may lead to disciplinary measures and/or termination of employment.

5. Upon completion of training, each employee will be provided a closed book, onsite, proctored, and scored Training Completion Quiz. The quiz will include no less than 35 multiple choice, fill in the blank, true/false, and short answer questions.

6. Each employee must score at least an 80% on their Training Completion Quiz. If not, the employee will need to retake portions of the training and will be administered another quiz. Each employee will be given three opportunities to receive an 80% or higher on the Training Completion Quiz. Upon doing so, each employee shall receive a signed and dated TSG Training Completion Certificate.

7. TSG will provide mandatory Annual Training Refresher Courses incorporating the newest relevant and applicable state and federal guidelines, so as to ensure that all employees remain abreast and updated on all applicable regulations.
8. TSG will retain all attendance records of all principals and employees and will make them available to the Department and its authorized agents upon request.

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

<table>
<thead>
<tr>
<th>D. Licensed Medical Professionals at Facility</th>
<th>Yes</th>
<th>No</th>
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<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>
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<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>
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<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>
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PLEASE PROVIDE AN EXPLANATION OF ANY RESPONSES ABOVE THAT WERE ANSWERED AS A “NO” AND HOW YOU WILL MEET THESE REQUIREMENTS BY THE TIME THE DEPARTMENT DETERMINES YOU TO BE OPERATIONAL UNDER THE ACT AND REGULATIONS:

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/SERVICING/ALTERATION PROTOCOLS.
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application
<table>
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<tr>
<th>Question</th>
<th>Answer</th>
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<tbody>
<tr>
<td>Name of the applicant</td>
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<tr>
<td>Address</td>
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<tr>
<td>City, State, Zip</td>
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<tr>
<td>- [City] [State] [Zip]</td>
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<tr>
<td>Phone Number</td>
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<td>Email Address</td>
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<td>- [Email]</td>
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<tr>
<td>Business Name</td>
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<tr>
<td>Description of the Dispensary</td>
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<tr>
<td>- [Description]</td>
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<td>Hours of Operation</td>
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<td>- [Hours]</td>
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<td>Days of Operation</td>
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<td>Payment Methods</td>
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<td>Security Plan</td>
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<td>- [Plan]</td>
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<td>References</td>
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</table>
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application
Section 11 – Transportation of Medical Marijuana

<table>
<thead>
<tr>
<th>A. Transportation</th>
<th>Yes</th>
<th>No</th>
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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:

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

- Medical marijuana will only be delivered between 7 a.m. and 9 p.m.
<table>
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<tr>
<th>Medical marijuana will not be transported to any location outside of this Commonwealth.</th>
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<tr>
<td>A global positioning system will be used to ensure safe, efficient delivery of the medical marijuana to a medical marijuana organization.</td>
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</table>

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

- At least one delivery team member will remain with the vehicle at all times that the vehicle contains medical marijuana.
- Each delivery team member shall have access to a secure form of communication with the dispensary, such as a cellular telephone, at all times that the vehicle contains medical marijuana.
- Upon demand, each delivery team member shall produce an identification badge or card to the Department or its authorized agents, law enforcement or other Federal, State, or local government officials if necessary to perform the government officials' functions and duties.
- Each delivery team member will have a valid driver's license.
- While on duty, a delivery team member will not wear any clothing or symbols that may indicate ownership or possession of medical marijuana.
- Medical marijuana stored inside the transport vehicle may not be visible from the outside of the transport vehicle.
- A delivery team shall proceed in a transport vehicle from the dispensary, where the medical marijuana is loaded, directly to the medical marijuana organization, where the medical marijuana is unloaded, without unnecessary delays. Notwithstanding the foregoing, a transport vehicle may make stops at multiple facilities, as appropriate, to deliver medical marijuana.
- Any vehicle accidents, diversions, losses, or other reportable events that occur during transport of medical marijuana must be immediately reported to the Department either through a designated phone line established by the Department or by electronic communication with the Department in a manner prescribed by the Department.
- The Department shall be notified daily of the dispensary's delivery schedule, including routes and delivery times, either through a designated phone line.
established by the Department or by electronic communication with the Department in a manner prescribed by the Department.

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

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

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

### B. Transport Manifest

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<th>Yes</th>
<th>No</th>
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By checking “Yes” to any statement, you affirm that the transport manifest (printed or electronic) that accompanies every transport vehicle will contain the following information and meet the following requirements:

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

- The name, address and permit number of the medical marijuana organization receiving the delivery, and the name of and contact information for a representative of the medical marijuana organization.

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

- The date and approximate time of departure.

- The date and approximate time of arrival.

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

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

- When a delivery team delivers medical marijuana to multiple medical marijuana organizations, the transport manifest must correctly reflect the specific medical marijuana in transit; each recipient will also provide the dispensary with a printed receipt for the medical marijuana received.
- All medical marijuana being transported must be packaged in shipping containers and labeled in accordance with §§ 1151.34 and 1161.28 (relating to packaging and labeling of medical marijuana; and labels and safety inserts).

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

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

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

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:

DOH REDACTION
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

DOH REDACTION

DOH REDACTION

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DOH REDACTION

pennsylvania
DEPARTMENT OF HEALTH
Section 12 – Storage of Medical Marijuana

A. Storage Requirements

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

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

DOH REDACTION
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

[Redacted]

[Redacted]

[Redacted]

[Redacted]
Section 13 – Labeling of Medical Marijuana Products

A. Labeling Requirements

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

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

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Any resemblance to the trademarked, characteristic or product-specialized packaging of any commercially available food or beverage product.</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>Any statement, artwork or design that could reasonably lead an individual to believe that the package contains anything other than medical marijuana.</td>
<td>☐</td>
<td></td>
</tr>
<tr>
<td>Any seal, flag, crest, coat of arms, or other insignia that could reasonably mislead an individual to believe that the product has been endorsed, manufactured, or approved for use by any State, county or municipality or any agency thereof.</td>
<td>☒</td>
<td></td>
</tr>
<tr>
<td>Any cartoon, color scheme, image, graphic or feature that might make the package attractive to children.</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

PLEASE PROVIDE AN EXPLANATION OF ANY RESPONSES ABOVE THAT WERE ANSWERED AS A “NO” AND HOW YOU WILL MEET THESE REQUIREMENTS BY THE TIME THE DEPARTMENT DETERMINES YOU TO BE OPERATIONAL UNDER THE ACT AND REGULATIONS:
B.  PLEASE DESCRIBE YOUR PROCESS FOR CREATING AND MONITORING THE LABELING USED FOR MEDICAL MARIJUANA PRODUCTS:

DOH REDACTION
**Section 14 – Inventory Management**

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

<table>
<thead>
<tr>
<th>B. Inventory Management</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>By checking “Yes” to any statement, you affirm that each dispensary will maintain the following inventory data in its electronic tracking system:</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>
</tbody>
</table>
**Pennsylvania Department of Health**  
**Medical Marijuana Dispensary Permit Application**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>• Medical marijuana dispensed to a patient or caregiver.</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>
</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>
</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>
</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:**

**DOH REDACTION**
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 text]
Section 16 – Sanitation and Safety

A. Please provide a summary of the intended sanitation and safety measures to be implemented at each proposed facility listed in the permit application. These measures should cover, but are not be limited to, the following: a written process for contamination prevention, pest protection procedures, medical marijuana product handler restrictions, and hand-washing facilities.

As required by §1161.34, TSG will continually maintain the facility in a sanitary condition to limit the potential for contamination or adulteration of the medical marijuana products within the facility. All equipment and surfaces, including floors, counters, walls and ceilings, will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the United States Environmental Protection Agency (“EPA”), in accordance with the instructions printed on the label. Equipment and utensils will be designed and of such material and workmanship as to be capable of being adequately cleaned.

Facility Requirements:

Employee Requirements:

Principles of Receipt of Material:
Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

Receipt of Materials:

DOH REDACTION

Quarantine Area:

DOH REDACTION

Inspection:

DOH REDACTION
Contamination Mitigation:

Release:

Documentation and Record:

Sanitation Technology:
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:

Required records and documentation are noted throughout the written Standard Operating Procedures (SOPs). TSG will make recordkeeping, adherence to chain of custody and documentation part of each employee’s job responsibilities. Employees will be required to make two sets of all records and documents. One set of records and documents will be made within the BioTrackTHC inventory control system, and a second set of records and documents will be made using physical log sheets and templates. The physical records and documents will be maintained at the dispensary within a limited access area of the facility. Failure to create and maintain records and documentation will be grounds for employee disciplinary action and/or job termination.
Record keeping and documentation are noted within other SOPs where documentation is required. The SOPs will also reference which documentation records and log sheets are required to be filled out and maintained.

Secondary Records:
Inventory and Sales Recordkeeping: TSG will follow guidance defined under the HIPAA standards to ensure authentication, access control, logging, virus/malware control and security for data in transit and at the licensed premises.

Equipment Maintenance Log: TSG will keep an Equipment Maintenance Log for all routine maintenance, equipment cleaning and equipment inspections or other maintenance work.
performed. In addition additional parts for critical systems will be maintained onsite to expedite any repairs if required.
Part E – Applicant Organization, Ownership, Capital and Tax Status
(Scoring Method: 150 Points)

SECTION 18 – ORGANIZATIONAL STRUCTURE

<table>
<thead>
<tr>
<th>Applicant’s Form of Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Check One</td>
</tr>
<tr>
<td>☐ C-Corporation</td>
</tr>
<tr>
<td>☐ S-Corporation</td>
</tr>
<tr>
<td>■ Limited Liability Company</td>
</tr>
<tr>
<td>☐ Sole Proprietorship</td>
</tr>
<tr>
<td>☐ Partnership</td>
</tr>
<tr>
<td>☐ Limited Liability Partnership</td>
</tr>
<tr>
<td>☐ Non-Profit Organization</td>
</tr>
<tr>
<td>☐ Other (explain):</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Applicant’s Organization Documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>State of Incorporation or Registration: Delaware</td>
</tr>
<tr>
<td>Date of Formation: 07/09/15</td>
</tr>
<tr>
<td>Business Name on Formation Documents: The SENTEL Group</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Applicant’s Identification Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Employer ID number:</td>
</tr>
<tr>
<td>PA Unemployment Compensation Account Number:</td>
</tr>
<tr>
<td>N/A</td>
</tr>
<tr>
<td>PA Department of Revenue Tax number (if applicant is currently doing business in Pennsylvania):</td>
</tr>
<tr>
<td>N/A</td>
</tr>
<tr>
<td>PA Workers’ Compensation Policy Number (if applicant is currently doing business in Pennsylvania):</td>
</tr>
<tr>
<td>N/A</td>
</tr>
</tbody>
</table>

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:

Introduction
The Sentel Group (“TSG”) intends to be a committed partner to the Commonwealth of Pennsylvania in helping increase the wellness of those eligible for medical marijuana use. TSG’s mission is to employ best practices in providing the highest quality of medical marijuana varieties of medical marijuana products, featuring unique cannabinoid profiles to provide relief for qualifying conditions as recommended by certifying physicians.

TSG ensures business success in the implementation and operation of its Pennsylvania medical marijuana dispensary due to an array of factors, including the significant investment TSG has
already made into its medical marijuana organizational efforts within the Commonwealth of Pennsylvania. TSG’s senior management’s fully verifiable business history, capitalization, and ability to implement and maintain extremely successful businesses are some of the reasons TSG would be able to operate and maintain a successful and financially viable medical marijuana organization within the Commonwealth. They have assembled industry standard compliant business plans, processes, and practices. TSG is an extensively experienced group of highly qualified and skilled advisors and employees and has already assembled Pennsylvania regulatory compliant dispensary SOPs.

**Business History and Ability**

First, in terms of business history, TSG’s senior leadership brings to bear nearly three decades of verifiable domestic and international business leadership experience, including delivering a broad range of innovative technologies in science, research, and development. Established in 2015, TSG was initiated out of a single devotion to the advancement of health care through progressive technologies. TSG has been issued a Medical Cannabis Dispensary License Pre-Approval by the state of Maryland and is currently in the process of constructing its Maryland dispensary facility, and is ahead of schedule to open its dispensary two months prior to its deadline of December 21, 2017.

TSG’s principal objective is to partner with communities within the Commonwealth of Pennsylvania to improve patient health through increased availability of medical marijuana products. TSG will accomplish this mission in Pennsylvania by leveraging its management and staff’s combined experience and expertise in the development and implementation of state-of-the-art scientific and technological advancements to safely and effectively warrant the availability of medical marijuana products for eligible patients.

TSG is a self-funded company and is 100% owned and operated by Mr. Russell Wright, who serves as the Chairman, President and CEO. Mr. Wright comes from a long line of healthcare caregivers, including his father, Dr. Robert Wright, who is a physician and also currently on the Board of Trustees for Morehouse School of Medicine and the Columbus State University, and on The Ohio State University Alumni Advisory Council. Russell’s mother and grandmother were nurses as well, allowing the Wright family to be intimately familiar with the mission of offering quality health care and programs that set community standards, exceed patients’ expectations and are provided in a caring, convenient, cost-effective, and accessible manner.

Additionally, TSG’s success has, in part, been based on the blended business principles and business plans of five predecessor organizations where Russell Wright served as Chairman and/or CEO. These companies are comprised of Dimensions International, Inc. (Dimensions), R&R Enterprises, Flight Explorer, SENTEL Corporation (SENTEL) and Brilliant Engineering. These companies were all exceptionally successful. For instance, Dimensions (Russell Wright’s family business), which initially started out with the Wrights and two other employees, rapidly grew to provide a wide range of services including research and development, science and engineering, security and IT in over 100 locations across the United States and internationally.
over the span of 14 years. In July of 2007, Dimensions International was acquired by Honeywell, International for over $230,000,000.00 (please see http://www.blackenterprise.com/small-business/5-tips-hiring-talent-management-russell-wright-sentel-corp/.)

Additionally, SENTEL (with core competencies including research and development, integrated logistics, engineering, security and IT) averaged annual revenues of $50,000,000 from 2010-2014; and the firm’s 2016 annual revenues amounted to over $100,000,000. Additionally, the work Mr. Wright is currently managing for his firm includes a Pennsylvania Army National Guard (PAARNG) prime contract awarded to the firm in November of 2011 in the amount of $4.44M. On this contract, Mr. Wright initially had a staff of nearly 20 full time personnel providing logistics support services to the state of Pennsylvania. The company is currently providing property accountability, assistance management, and asset visibility support functions/services to assist the United States Property and Fiscal Officer for Pennsylvania and PAARNG Units with the execution of property accountability management and visibility support functions, including providing technical support and guidance for Property Book and related projects.

The TSG leadership team has extensive experience executing effective and efficient business plans and operations time and time again for separate businesses to become successful one after the other; and the fact that TSG is comprised of the same leadership implementing a similar business plan aids in ensuring TSG’s continued success. This is also re-enforced by the fact that TSG’s business plan is comprised of both industry standard and corporate specific, tried and tested methodologies.

The TSG leadership team has extensive experience executing effective and efficient business plans and operations time and time again for separate businesses to become successful one after the other. The ability to plan and maintain a successful and financially sustainable operation is also re-enforced by the fact that TSG’s business plan is comprised of both industry standard and corporate specific, tried and tested methodologies and because TSG is comprised of the same leadership implementing a similar business plan aids in ensuring TSG’s continued operational and financial success. TSG’s sole owner Mr. Russell Wright has capitalization currently valued
at approximately $35,000,000.00 as outlined in more specific detail in the capitalization portion of this application, which further ensures Mr. Wright’s ability to continue investing in TSG to ensure its continued success.

In addition, by leveraging the mainstay of some of the other successful businesses that Russell Wright currently owns, SENTEL and Brilliant Engineering, the resources and infrastructure needed to fulfill PA’s requirements as a grower, processor and dispensary of medical cannabis in the State of Pennsylvania, have already been assembled. For instance, TSG already has existing industry standard processes in place, to include International Organization for Standardization (ISO 9001) and Capability Maturity Model Integration (CMMI Level II and III) compliant infrastructure in place to include accounting and finance, human resources, IT, security, ethics, purchasing, administration and management (precautionary business measures have been put in place however to ensure that TSG remains a wholly separate and distinct organization from the other companies Russell Wright currently owns).

Thus, the fact that TSG’s senior management has and is currently successfully doing business in Pennsylvania and for the Pennsylvania state government, along with the fact that the tried and tested business processes described above have already been implemented in creating and maintaining TSG’s business practices, further leads to ensuring TSG’s continued success post PA medical cannabis license award.

Moreover, TSG’s business plan also entails provisions that upon license award, Russell Wright is to immediately and fully commit himself to TSG operations in PA so as to ensure that in addition to the already assembled management and advisory teams put in place to provide oversite, he personally provides direct oversite on all business, management, and operational aspects of the business at all times. Thereby ensuring his full commitment to the business so as to further ensure the business’ success.

In addition to TSG’s leadership and their experience putting together successful teams, a comprehensive advisory and management has already begun to be formed. This group is comprised of distinguished industry researchers, technologists, engineers, scientists, developers, analysts and planners who are extensively experienced and distinguished in the field of medical cannabis (including in-patient care and access, safety and security, training and education, and community enhancement), and who are fully committed to the successful execution of the Pennsylvania Department of Health’s mission (some of the specific subject matter experts retained for this effort, along with their credentials, are outlined in the second section of this question).

Additionally, TSG has retained the American Cannabis Company (“ACC”), a known industry leader in the field of regulated medical cannabis, not just to provide extensive application support services assistance, but also to provide oversite on the design of TSG’s dispensary, based on the site plans ACC has already provided for TSG’s facilities. ACC has also assisted TSG in creating full and complete Pennsylvania specific SOPs for TSG’s dispensary operations.
(Pennsylvania specific TSG Dispensary SOPs have been submitted as part of addendums to this application).

TSG has also retained Dr. Suzanne Sisley, a well-known subject matter expert in the field of medical cannabis, not just as its PA medical cannabis subject matter expert throughout the application process (in providing advisement by means of extensive application input and review), but has also retained Dr. Sisley as its PA Medical Cannabis Dispensary Medical Director.

TSG’s vision and mission statement includes providing medical cannabis related products to patients from all socioeconomic, ethnic, and geographic backgrounds with the best quality and variety of organic medical cannabis flowers and medical cannabis infused products and targeted cannabinoid therapy.

The Company was initiated by Russell Wright’s desire to contribute to the healthcare industry with a strong focus on patient welfare, and Mr. Wright’s hope is to develop a vertically integrated business (cultivating, processing and dispensing) that sets the standard in product development and research, providing the highest grades of medical marijuana products and employing the best practices in customer service for all eligible patients. If only awarded a dispensary license, the company will be a model for other medical marijuana dispensaries in the Commonwealth.

TSG’s dispensary will provide Pennsylvania’s qualified patients and caregivers with services in a safe, secure and personalized manner, with the highest level of expertise and compassion. The dispensary will be accessible, attractive and integrated into the surrounding community. Additionally, the dispensary, under the direction of TSG Medical Director, Dr. Sisley, will be run by experienced staff and registered agents with the following qualifications: trained and corporately certified in, but not limited to, the science behind cannabis’ efficacy, disease state models, patient symptom profiles, risks, treatment benefits, side effects, drug interactions, contraindications, indications, mechanism of action, delivery systems, dosing regimens, current clinical trials, and TSG’s cannabis product line, and who will ensure the dispensing of medical cannabis is in line with industry best practices.

TSG’s dispensary will provide a highly consultative and interactive patient experience, guiding each patient through intake (i.e., assistance with forms), and purchases to ensure that patients receive medical marijuana product therapy fitting their specific medical need as recommended by a certifying physician.

Patients will be monitored on a regular basis by TSG’s highly qualified pharmacists, nurses, and other staff members who will work with patients to identify the product line that best meets their needs, assist in adjusting dosages and varieties if they change, and provide information and referral services to other care providers as deemed appropriate (i.e., to community-based nonprofits or non-governmental organizations). Evidence has demonstrated that communication between physicians and patients has the highest rate of success in providing safe, effective and economical patient care, the business plan calls for a communication process.
that will be implemented by the dispensary to inform the prescriber that the patient has received the prescribed dose, and has extensively been educated on factors including dosing regime, safety, side effects, drug interactions, contraindications, indications, delivery modes and support group resources.

TSG will be dedicated to research in cultivation and processing, providing its dispensary with the finest medical marijuana products and continually looking for ways to improve.

TSG’s research will be led by TSG’s Medical Director and renowned medical cannabis researcher, Dr. Sisley, whose experience includes currently serving as a Principal Investigator in the nation’s only FDA-Approved Investigation with regards to the safety and efficacy of medical marijuana in veterans with chronic, treatment-resistant posttraumatic stress disorder. Dr. Sisley has served in this role for the past 7 years and has over 20 years of medical experience, including serving as the Program lead for the Arizona Medical Marijuana Physician Education Program (University of Arizona Grant Funded by the Arizona Department of Health Services), and has over 15 publications related to medical cannabis research. As such, TSG believes Dr. Sisley will further assure TSG’s success in terms of providing TSG with continued guidance to keep TSG abreast of leading research in the field.

TSG believes through providing exceptional customer service and focusing on community integration and education, we will increase our likelihood of success under the guidance of Dr. Sisley. TSG’s business plan calls for providing a variety of medical marijuana products to meet the needs of the qualifying Pennsylvania patient population with clearly labeled products packaged opaquely in child-resistant packaging according to current regulations and offering high-end, legal devices and products for dispensing medical marijuana products, allowing patients to address all of their needs in a single, safe location.

We will also provide education to patients and caregivers prior to them leaving the establishment which will further the likelihood adherence to the medical regimen to improve and/or heal patients’ current health needs and either taper them off cannabis treatment or continue to utilize the dispensary as their location of choice, contributing to the dispensary’s success. TSG does not view this business as “just” opening a dispensary, but as creating a healing environment as an extension of patient physician offices.

TSG operates as an LLC and is comprised of a management and advisory board who have been formed to bring the vision and mission of the organization to life. The management team will be responsible with the overall day-to-day operations of the business and the Advisory Board, comprised of specialists to include physicians, researchers, security specialists, educators, and quality assurance specialists, will serve to provide TSG with additional guidance.

TSG is well positioned to enter this rapidly growing market as a successful business in the Pennsylvania cannabis industry with premier medical cannabis provision in a professional manner and in accordance with the intent of the law. When initially putting together TSG’s management and advisory team, Russell Wright screened and vetted each member of the team to ensure that each clearly possessed the ability, expertise, and experience to assist TSG in
developing an effective and efficient business plan so as to render the business successful, in addition to ensuring that each expert shared his vision of contributing to Pennsylvania’s communities.

In addition to the TSG Employees referenced in Section 9 of this application, TSG’s Dispensary advisors are listed below, all of whom TSG has been in constant and continuous communications with regarding this effort.
Thus, and as outlined above, a large part of TSG’s business plan consists of maintaining an operational staff, along with a management and advisory team with the clear business ability and industry expertise and experience necessary to render TSG as an effective, efficient, and successful business in the medical cannabis industry. Additionally, this team has already put together business processes so thorough so as to even include daily business operations guidelines, including:

- The Clinical Director’s assessment of individual patients’ health needs for targeted cannabinoid therapy;
- The Dispensary Agents for Patient Consultation’s and Patient Intake educating patients regarding product varieties;
- The Dispensary Agent for Security’s ensuring the facility’s and medical inventory safety; and, (4) the use of BioTrackTHC perpetual inventory control systems to monitor inventory from seed to sale and to provide the State the necessary data for accurate accounting and reporting.

Thus, the culmination of the above factors, including TSG’s senior management’s fully verifiable business history and ability; current investment in this effort and capitalization; its already assembled, tried and tested industry standard compliant business plan and practices; its extensively experienced group of highly skilled advisors and employees; an already retained and highly experienced medical director; and TSG’s already assembled PA specific dispensary SOPs; and various business processes and policies all lead to ensuring TSG’s success, along with allowing TSG to provide:

- The highest quality medical marijuana products to patients suffering from eligible conditions;
- A welcoming and informative dispensary environment with a knowledgeable staff and agents to help meet their needs;
- Access to a convenient dispensary location, financial assistance to patients in need of transportation, and medical cannabis delivery services;
- Occupational Safety and Health Administration (OSHA) and The Health Insurance Portability and Accountability Act of 1996 (HIPAA) compliant patient privacy protection while ensuring accurate data collection for reporting purposes;
- Investment in research and development of new varieties for targeted cannabinoid therapies;
- A Commitment to ensuring that all facilities are safe, secure and environmentally friendly; and;
- Dedication of multiple resources to the continuing education of employees, patients, healthcare providers, caregivers and communities to provide comprehensive and accurate information of, but not limited to, risks, benefits, legalities, support resources, approval process, alternative and adjunctive health & wellness regimens, alternative pharmacological advances and use of cannabis for medicinal purposes.
This will be with the sole intent to provide full transparency that will allow patients, healthcare providers, caregivers and communities the information to make the most educated decision as to what is the safest and most effective medical treatment option for each individual patient’s needs.

**SECTION 20 – CURRENT OFFICERS**

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

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>First Name:</strong> Russell</td>
<td><strong>Middle Name:</strong> Talley</td>
</tr>
<tr>
<td><strong>Last Name:</strong> Wright</td>
<td><strong>Suffix:</strong></td>
</tr>
<tr>
<td><strong>Occupation:</strong> Owner</td>
<td><strong>Title in the applicant’s business:</strong> Owner, President / CEO</td>
</tr>
<tr>
<td><strong>Also known as:</strong> Russ</td>
<td><strong>Date of birth:</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name and Residential Address</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>First Name:</strong> N/A</td>
<td><strong>Middle Name:</strong> N/A</td>
</tr>
<tr>
<td><strong>Last Name:</strong> N/A</td>
<td><strong>Suffix:</strong> N/A</td>
</tr>
<tr>
<td><strong>Occupation:</strong></td>
<td><strong>Title in the applicant’s business:</strong></td>
</tr>
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<td><strong>Also known as:</strong></td>
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Pennsylvania Department of Health
Medical Marijuana Dispensary Permit Application

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IF MORE SPACE IS REQUIRED, PLEASE SUBMIT ADDITIONAL INFORMATION ON OTHER OFFICERS IN A SEPARATE DOCUMENT TITLED “CURRENT OFFICERS (CONT.)” 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

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102 pennsylvania
DEPARTMENT OF HEALTH
## Pennsylvania Department of Health
### Medical Marijuana Dispensary Permit Application

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## B. For partnerships and LLPs

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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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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:
Part F – Community Impact
(Scoring Method: 100 Points)

SECTION 23 – COMMUNITY IMPACT

PLEASE BE ADVISED, INDICATION OF SUPPORT FROM PUBLIC OFFICIALS WILL NOT BE CONSIDERED WHEN EVALUATING THIS SECTION.

PROVIDE A SUMMARY OF HOW THE APPLICANT INTENDS TO HAVE A POSITIVE IMPACT ON THE COMMUNITY WHERE ITS OPERATIONS ARE PROPOSED TO BE LOCATED:

The Sentel Group (“TSG”) community outreach and impact program is extensive and includes discount and charities measures; a community benefits program; community outreach and support measures; public relations and marketing strategies, a comprehensive Good Neighbor Policy (including security, social responsibility, and community crime deterrence measures); and an environmental impact plan so as to ensure a positive impact on the communities where TSG’s Pennsylvania operations are proposed to be located. Additionally, TSG’s senior leadership has verifiable experience successfully implementing these tried and tested community outreach measures within various business organizations time and time again, and in numerous communities, further ensuring TSG’s ability to make a positive impact in various Pennsylvania communities.

TSG Senior Leadership Community Outreach History and Ability

First, in terms of TSG’s proven community outreach abilities, TSG’s senior leadership is deeply committed to efforts to promote social, political, economic, and environmental community contributions and improvements, and has a verifiable record of effectively and efficiently doing so at the federal, state, and at the local levels. Additionally, TSG’s senior management team has done so in various forms ranging from volunteering/service to providing significant financial assistance/funding. Specifically, Dr. Robert Wright, TSG’s owner Russel Wright’s father, and
TSG’s lead business advisor will lead TSG’s Community Outreach Plan and ensure its successful execution in the PA communities where TSG is granted a medical cannabis facility license.

Dr. Robert Wright is a well-respected philanthropist, activist, and community leader. Dr. Wright’s activities in this field trace back to his involvement in the Civil Rights Movement in 1965 (including his participation in the Selma Montgomery March in 1968). Dr. Wright spent the next 45 years leading various community programs. For instance, while serving three consecutive terms as a member of the Columbus, Georgia City Council. Dr. Wright led various efforts ranging from developing and supporting legislation related to housing, recreation, employment, industrial development, and street and highway improvements in various communities including hub zones, and various other socially and economically repressed regions. He also served on the Board of Governors for the Joint Center for Political and Economic Studies, which focuses on supporting research and policy solutions for various disadvantaged communities.

Dr. Wright has also been on the board of various educational organizations, including the Morehouse School of Medicine, The Ohio State University Alumni Advisory Council, Bowie State University, Marymount University, and the Horatio Alger Association, where he has made significant impacts in improving various communities with respect to setting up numerous educational opportunities, including scholarship programs, and also contributed significant funding to these programs to enhance these opportunities.

For instance, one of Dr. Wright’s community efforts includes contributing significantly to the building of a 78,000 square foot, $26,000,000,000 facility, the Robert L. Wright Health Sciences Center (4600 River Rd, Columbus, GA 31904), for Columbus Technical College in 2010 (please see pictures below and http://stanleybeamansears.com/project/columbus-technical-college-robert-l-wright-jr-health-sciences-building/).
Robert L. Wright, Jr. Health Sciences Center
The objectives of the Robert L. Wright Health Sciences Center included providing occupational education and training programs to satisfy the increasing demand for health care workers in the community.

Dr. Wright has received numerous awards and honors for his support of various community projects, the most recent being the 2014 Congressional Black Caucus Phoenix Award, presented to him in a ceremony with then President Barack Obama as keynote speaker, for his contributions and support towards providing leadership development and scholarship opportunities in various communities.

Dr. Wright and son Russel Wright have implemented the spirit of their philanthropy and community service and outreach throughout each community they have held a business in the past and continue to do so today, at the state, and at the local level. For instance, one of Russel Wright’s companies, SENTEL, has significantly contributed to various charities each year. Additionally, SENTEL’s senior management and its staff have conducted community service consistently (some of the specific charities Russel Wright and SENTEL have contributed to and various community service efforts are listed in detail in the “charities and discounts” section below).
Additionally, the below outlines some of TSG’s specific goals to contribute to and have a positive impact on the communities where TSG’s Pennsylvania operations are proposed to be located.

**Charities and Discounts**

TSG’s senior management has extensive and verifiable experience in fundraising and community service. Specifically, TSG’s owner, Russell Wright, currently owns several companies, including SENTEL, a company that fosters a culture of social responsibility and effectively promotes this value through both leadership and example. The company’s senior leaders and employees routinely participate in local efforts. For example, some of the company’s corporate headquarters staff have volunteered at the Carpenter’s Shelter on behalf of SENTEL the last Friday of each month for the past fifteen years consecutively. The shelter works to eliminate homelessness through respect, responsibility, and results. Other charities and humanitarian organizations Russel Wright and his companies have supported over the years include Wounded Warrior (Appalachian Trail Hike fundraising event, 2012), Many Hopes (to build homes/schools in Kenya, 2012), St. Jude’s fundraising event (Warrior Dash, 2015), Toys for Tots (fundraising triathlon, 2014), and the Smithsonian in bringing the National Museum of African American History and Culture to the Nation’s Capital in 2016.

Thus TSG’s senior leadership has a successful fundraising track record, and will fundraise and also participate in community events and encourage all employees to volunteer within PA communities, including at various PA Court Appointed Special Advocates (CASA) organization programs and events, as part of TSG’s commitment to helping PA Communities.

In understanding that economic hardships can prevent patients from receiving proper medical treatment. TSG has also developed a Compassionate Needs Plan to aid patients who face financial adversity, and/or who suffer from chronic illnesses that have a negative impact on their daily lives. As TSG’s staff gets to know patients better, TSG will be able to make adjustments to its Needs Plan, catering it to the local Pennsylvania patient community.

TSG also plans to assist the following groups: Active and former military personnel, individuals affected by cancer or HIV/AIDS, terminally ill patients, and senior citizens (over the age of 65).

TSG will also place 1% - 5% of its gross annual revenue to such worthy causes as cancer, Alzheimer’s, and AIDS research, and will fundraise to provide a greater impact to the number of individuals it can help.

Additionally, if there are monies left over at the end of the fiscal year, TSG will also offer gift cards in a lottery system for its registered patients.
Additional Statewide Community Benefits Program

Veteran Community Outreach Program- TSG, in conjunction with lead medical advisor, Dr. Suzanne Sisley, has already devised a veteran community outreach program that takes advantage of TSG’s team of leading expert advisors’ unique understanding of metabolic processes to provide innovative treatment options for un-met Veterans’ medical needs as part of TSG’s Maryland Dispensary Community Outreach Plan.

If awarded a PA medical cannabis license, TSG will implement a similar program through local Pennsylvania American Legion and Veterans of Foreign Wars posts. Currently, this program consists of Dr. Sisley leading TSG’s other medical cannabis advisors, including Dr. Malik Burnett, M.D. and medical cannabis specialist, in the clinical research to develop, produce, and commercialize novel therapeutic approaches for the treatment of multiple critical ailments from cancer and infections to pain/Post Traumatic Stress Disorder (PTSD) and cancer to age-related illnesses and neurobehavioral disorders.

TSG feels that the correct way to look at the medical cannabis industry is from a bio-pharmaceutical standpoint, in a manner that allows whole plant and cannabinoid-based products to modulate the endocannabinoid system to treat multiple conditions.

While concentrating on our core activities of discovering and developing treatments that will make a meaningful difference in patients’ lives, TSG remains mindful that we have other responsibilities to the clinicians who utilize our drugs, health authorities around the world, our employees, and the communities which we currently serve. As such, we continually strive to improve our corporate responsibility standards and activities, implementing comprehensive ethical standards and undertaking patient needs. If awarded a PA cannabis medical license, will do the same for our PA community progressive unmet Veterans’ medical needs initiatives.

In addition to this program, which is currently underway in Maryland, and that TSG intends on implementing in Pennsylvania statewide, TSG has also already been in constant and continuous communications with its PA contacts within national organizations and programs that provide community outreach opportunities at the state level to PA, including:

ACNA Outreach and Education Programs – TSG is currently a member of The American Cannabis Nurse’s Association’s (ACNA) and is working with the organization’s outreach and education programs division through Ms. Barbara Ochester, RN. Ms. Ochester is a PA registered nurse who also currently serves as one of ACNA’s five Directors. Ms. Ochester’s masters degree is in Public Health and she specializes in how patients receive medical cannabis information, how to make patients aware, and options on how to receive health care. Ms. Ochester has agreed to serve in an advisory capacity for TSG’s PA grow/processing facilities, and as an employee for TSG’s current Maryland and later Pennsylvania medical cannabis facilities, should TSG be granted a medical cannabis license. Ms. Ochester is currently deeply involved in community outreach for the ACNA, including educating and informing various communities on medical cannabis. Further, she has fully committed to leading TSG’s ACNA PA community activities due to her deep connections with various organizations throughout the state.
University of Pennsylvania / Penn Medicine - TSG plans on contributing to the University of PA’s School of Medicine and the Department of Psychology, as Dr. Sisley’s (TSG’s lead medical advisor) current Federal Department of Agriculture (FDA) approved clinical trial evaluating the safety and efficacy of four different varieties of cannabis in the treatment of military veterans with PTSD was evaluated and approved by the University of Pennsylvania School of Medicine and the Department of psychology. Dr. Sisley’s clinical trial is ongoing and will not be completed for another two and a half years.

TSG has also been in communication with Penn Medicine's Office of Public Affairs and Community Outreach Office concerning volunteering at various community clinics throughout the state.

Rothman Institute Foundation- TSG has been in contact with the Rothman Institute Foundation as it supports scientific clinical research of diseases associated with the skeletal system and related activities. The foundation also directly engages in and supports other organizations which engage in research and education related to the causes, diagnosis, treatment, prevention, and control of diseases of human skeletal system. The primary objectives of TSG’s contribution to the Rothman Institute Foundation and its related organizations will be towards research programs developing new information on this subject and dissemination of this information through the publication of articles and journals, and the presentation of papers to medical and lay audiences. TSG’s discussions with the Rothman Institute Foundation also consist of making contributions towards direct research expenditures and reimbursement of costs to Thomas Jefferson University Hospital, affiliated hospitals, and patient centers for approved expenditures in general research associated with orthopedic research studies.

Pennsylvania State University – TSG’s interest in supporting Pennsylvania State University includes the fact that it is a research based University and has locations throughout the state of PA. TSG’s involvement supporting Pennsylvania State University will include supporting the organization’s Cancer Institute, the Penn State College of Medicine, and the Milton S. Hershey Medical Center. TSG has already been in communication with the Hershey Medical Center’s Associate Director of Cause Marketing & Community Fundraising concerning the organization’s Champions of Health Program, Corporate Match program, and pledges, legacy gifts, and gifts in security.

TSG’s community outreach plan also includes community outreach and the local/regional level. In doing so, below are the organizations TSG has already been in communication with and below are some of their specific programs that TSG will support.

- **PinnacleHealth West Shore Hospital**- TSG will support the hospital through a variety of special events designed to raise funds and increase health awareness in the community. TSG’s staff will also volunteer in the hospital’s various volunteer programs ranging from administrative support services, greeting, and front desk greeting support services to its patient care support program. TSG will also contribute to health screening programs, at lectures, and at community outreach programs.
• **TCV Community Services** - TSG will assist TCV with behavioral health services related to allowing individuals in leading drug and alcohol-free lifestyles and/or in reducing potential harm associated with substance abuse. TSG will also assist TCV with programs geared towards assisting individuals with intellectual and developmental disabilities; its older adult program; its residential services; and its child adolescent, and adult training programs.

• **Volunteers of America, Pennsylvania** - TSG staff will volunteer in a range of activities with this organization their programs, especially their programs geared at assisting with supporting services for veterans and their families in Cumberland County.

• **Meals on Wheels** - TSG staff will assist this organization’s efforts in Hampden Township, including volunteering for kitchen help at least once a month (TSG staff members have participated in a similar program in several other communities once a month for over a year and a half).

• **Hampden County Volunteer Fire Company** - TSG will support this organization in numerous capacities, including donating funds to the organization, participating in its annual fund drive, and volunteering for various services including driver, marketing, IT, fundraising, training, administrative, and public event support services.

• **Bethesda Mission** - TSG will support this organization’s mission in providing housing, food and access to medical support services in a structured environment for homeless men and women. TSG will do so both financial contributions and by volunteering for the organization, including volunteering in this organization’s Community Youth Center support programs.

• **YMCA Greater Harrisburg** - Specifically, TSG would assist this organization with its programs aimed at providing family outreach and education programs with aims towards family fostering bonds and communication skills.

• **West Shore Senior Center** - TSG will assist this organization with its programs geared towards helping elders in remaining active both in terms of providing donations and conducting volunteer work for the organization.

• **United Way of Carlisle and Cumberland County** - TSG’s staff will assist this organization by volunteering for them in an array of capacities, ranging from serving as front desk volunteers to campaign volunteers to special event volunteers. TSG also intends on assisting United Way’s numerous affiliated partners in the community.

Upon receiving a medical cannabis dispensary permit Cumberland County’s Hampden Township, TSG affirms it will also reach out to various other local Cumberland County, Pennsylvania organizations that it has not yet reached out to, regarding supporting various additional programs. Such organizations will include:

Organizations and programs that support education, specifically programs that:

• Work to eliminate pre-K – 12th grade achievement gap in public education through curriculum-based or school-sponsored programs, including

• Support post-secondary education

• Support booster programs for drug abuse prevention, awareness, and treatment

Organizations and programs that support health, specifically programs that:

• Support research into cures and treatments for qualifying conditions
• Support further research into effective marijuana treatments of qualifying conditions
• Support programs that will improve the health of the community

Organizations that support the improvement of low and moderate income communities through programs that:
• Create and sustain affordable housing
• Facilitate literacy
• Provide job training and workforce development
• Revitalize and stabilize community
• Education

TSG will also consider requests from organizations that work to enhance community diversity through arts and culture and provide:
• Access to and participation in cultural experiences for low and moderate income individuals
• Availability of a broad array of artistic opportunities and venues that reflect the community’s diversity

TSG will consider requests from organizations that work to enhance a community’s quality of life through projects involving civic engagement through:
• Public policy
• Community beautification
• Civic leadership
• Citizen education
• Cultural diversity

TSG is committed to building strong environmental practices through programs that:
• Conserve natural resources
• Protect endangered species
• Preserve the environment

TSG will consider requests from social and human service organizations that:
• Enable and sustain independence for individuals and families
• Ensure access to health education programs and quality health care

If organizations meet TSG’s eligibility requirements and fit in with our philanthropic goals and objectives, we will accept requests and review them throughout the year. Local decisions are made with priority.

**Community Outreach and Support**

TSG is committed to Pennsylvania residents and to improving the economy of the state. TSG is also committed to building community engagement with local PA leaders and residents in the surrounding dispensary facility neighborhoods to effectively address any community concerns. TSG will also establish a phone hotline for community members to contact its PA medical cannabis...
facility if they have any complaints, concerns or would like to report an incident, and the appropriate facility agents will respond within 12 hours of the call. The hotline number will be advertised in letters to the community, ads in local papers, and announcements at neighborhood association meetings. TSG will make every effort to address concerns with thoughtful, targeted solutions and will also work with the local zoning board, in conjunction with community groups, to address any negative impacts that may arise as the business grows.

By establishing a safe, clean, and well-managed PA medical cannabis facility, TSG will demonstrate to neighboring businesses and residents that the medical cannabis industry can make positive contributions to the local community. TSG’s outreach and support efforts will help minimize negative impacts on the surrounding community, and neighbors will know that their voices are being heard regarding concerns and complaints, thus limiting undesired activity. The feedback gathered will be disseminated to TSG’s advisory board for their review, input and possible recommendations for additional opportunities.

**Public Relations and Marketing**

**Business Plan Encompassing a Community Oriented Marketing Model**

TSG’s business plan not only entails providing one-on-one education to employees, but also to the community as TSG’s medical cannabis dispensary facility becomes established in Pennsylvania. TSG will do so with a marketing plan, led by ACNA Director and PA RN Barbara Ochester, that includes making brochures, pamphlets, and other informational materials available and our staff will work with community members to develop a public outreach campaign including providing presentations at local business organizations, nonprofits and community-based organizations, and service club meetings to provide education and address questions. An easily, accessible and frequently updated website will also be developed to include separate user-friendly portals tailored to the needs of patients, physicians, employees, and to the community.

In order to give back to the community, TSG will offer sponsorships of selected community events and organizations doing compassionate work (i.e., holiday food drives, Veteran’s Day and Memorial Day events, etc.) and will look to expand these activities as the business grows. The staff will reach out to develop relationships with local PA nonprofits and non-governmental agencies providing complementary services to the patient population in order for qualified staff members to make referrals for other services to patients and vice-versa.

**Good Neighbor Policy**

TSG has a proven history of building and maintaining good relationships with all neighbors – including local business improvement districts, building owners, small businesses, and residents alike. TSG will make every effort to respect the perspectives of our neighbors and to address their concerns. As a responsible corporate citizen committed to developing and maintaining strong community relationships, TSG has developed a Good Neighbor Policy that will discourage and minimize any behavior that may adversely impact the communities and/or businesses in the surrounding area for its Maryland dispensary facility.

If awarded a Pennsylvania medical cannabis dispensary facility permit, TSG affirms it will adapt and implement its good Neighbor Policy for its PA facilities as well. TSG’s Good Neighbor Policy outlines the steps TSG will take to ensure the safety and security of employees, patients, caregivers and members of the surrounding community. Facility security agents and employees will also be
trained to enforce the policy, which will emphasize two primary goals: (1) social responsibility and (2) community safety.

TSG’s current Good Neighbor Policy also currently includes the following steps to ensure any concerns within the community are addressed:

- Introduction meetings with all surrounding businesses, building owners, and residents.
- Educational information sessions to discuss the benefits of cannabis and the company’s overall mission and goals.
- Open feedback channels so any new concerns can be immediately addressed through our website, telephone, or mail.
- Strict compliance with all state and local ordinances.
- Non-obtrusive business practices shall ensure our business is discreet and operates like any other business.
- No blatant signage with offensive symbols or verbiage.
- Unmarked discreet transportation vehicles.

In addition, TSG will ensure that its facility are always maintained in a professional manner and consistent in appearance to the flow and nature of other businesses in the area. TSG’s chosen facility has generous designated parking available. Facility protocols will also be implemented to reduce the odor of medical cannabis, and maintain facility cleanliness.

**Social Responsibility and Medical Cannabis Facility Security**

TSG’s Good Neighbor Policy also stipulates that all TSG PA medical cannabis dispensary facility employees, registered patients and caregivers treat neighboring businesses and individuals in the surrounding facility area with respect and courtesy at all times. If a security agent observes a fellow colleague being rude, disrespectful, or threatening toward another person on TSG’s facility, the situation will be immediately addressed/diffused, and if necessary, the security agent will escort the offending individual from the dispensary facility grounds. TSG has created a standard that maintains a “No Tolerance” policy for inappropriate behavior of any kind. This will also assist in minimizing the presence of individuals whose actions may adversely impact the facility’s surrounding communities or businesses. Security protocols will also require that appropriate security agents monitor and survey the areas surrounding the dispensary facilities, so as to prevent loitering of any kind.

Before being allowed to enter the dispensary facility, a facility agent will verify that all individuals have appropriate badges accessible, demonstrating that they are permitted on the premises. If an individual does not have proper documentation demonstrating that they are permitted on the premises, they will be asked to exit the premises and a Security Agent will respectfully escort them, if necessary.

As part of the standup of TSG’s medical cannabis dispensary facility, all TSG employees will be asked to sign an agreement detailing the Good Neighbor Policy and the importance of observing and adhering to the Pennsylvania dispensary facility’s rules and regulations at all times, including attesting to the fact deviating from any medical cannabis recommendations and/or guidelines may result in disciplinary actions and/or in possible termination of employment. Further, as part of the
terms of employment, all dispensary facility employees and agents will be required to sign contractual documents during their initial orientation training, which delineate TSG’s Good Neighbor Policy and attests to their individual commitment to abide by the policies stipulated. These protocols will assist in minimizing the presence of individuals intending to disobey proper recommendations and/or guidelines, and/or individuals whose actions may adversely impact the dispensary’s surrounding communities or businesses.

**Community Crime Deterrence**

TSG has several highly skilled security system engineer advisors who will provide oversite on TSG’s PA medical cannabis facility security processes and procedures. These individuals have extensive security system development experience and have successfully designed, configured and maintained security systems for federal defense contracts. For example, they led the integration of state-of-the-art detection systems currently employed along the US Southern border and their work on the DoD perimeter surveillance program resulted in deployment of more than 400 systems to 4 installations in Afghanistan to protect against intruders and vehicle-born improvised explosive devices (VB-IED). They will use their combined knowledge and skills, in addition to working with two third-party security firms and their skilled personnel, including TechOpps and E-house Executive Security Professionals, to provide professional services in effectively implementing security protocols and standards that exceed Pennsylvania state requirements.

Crime deterrence protocols will include installing high-intensity-discharge (HID) floodlights around the premises to ensure that all building and parking areas of the facility are properly illuminated. High-resolution surveillance cameras, which will be strategically and/or discreetly placed throughout the exterior and parking areas of the dispensary facility, in accordance with all federal, state, and TSG Corporate guidelines. These cameras will include time and date stamps, and will capture video in full color.

As a part of TSG’s Good Neighbor Policy, neighboring businesses and the community will benefit from TSG’s dispensary facility security plans, which will include strategic placement of surveillance cameras, 24-hour monitoring protocols and the implementation of state-of-the-art technology. TSG’s comprehensive security plan will provide an additional layer of safety to TSG’s PA medical cannabis facility’s surrounding community.

**Environmental Impact Plan**

Conservation and the reduction of our carbon footprint within the communities we operate is also a priority for TSG’s senior management. ‘Reduce, Reuse and Recycle’ is currently implemented as part of TSG owner Russell Wright’s environmental impact plan throughout his various existing organizations. Mr. Wright believes environmental sustainability is of the highest priority to promote a sustainable community and ensures a positive and influential business impact in achieving future environmental goals. To reach this goal, Mr. Wright contracted designers, engineers and consultants who created and implemented an environmental impact plan that allowed for intelligent design, energy efficiency, and significantly reduced waste throughout Mr. Wright’s other organizations thus far. TSG will implement the same environmental impact plan to its’ PA
Employee Conservation: Management will also implement an employee conservation plan, which TSG’s senior management is already implementing in its other existing businesses. Specifically, TSG’s current employee conservation plan details actions employees can take for conservation efforts to try and reduce their carbon footprint and also includes a reward program to reward facility employees for conservation efforts. This includes encouraging team members to recycle all paper and plastic waste products. Energy efficient lights and equipment will also be utilized within the facility. We will also encourage and reward employees for their personal conservation efforts; such as carpooling and riding a bike to work. Waste products from the facility will be composted on site or mixed with biodegradable products for disposal.

Thus TSG’s Community Impact Plan is extensive and includes discount and charities measures; a community benefits program; community outreach and support measures; public relations and marketing strategies, a comprehensive Good Neighbor Policy including security protocols, social responsibility measures, and community crime deterrence measures; and an environmental impact plan, so as to ensure a positive impact on the communities where TSG’s Pennsylvania medical cannabis dispensary facility is proposed to be located. Additionally, TSG’s senior leadership’s verifiable experience successfully implementing these tried and tested community outreach measures within various business organizations time and time again, and in numerous communities further ensures TSG’s ability to make a positive impact in PA communities.
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.

| ☐ Yes | ☐ No |
---|---|

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

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

**APPLICATION:**
- ☒ Completed Application

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

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

pennsylvania
DEPARTMENT OF HEALTH
### 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>The Sentel Group_03172017_Dispensary_Additional Attachments_6-Month Timeline Contd</td>
<td>6-Month Timeline Contd</td>
<td>Not enough room on application</td>
</tr>
<tr>
<td>The Sentel Group_03172017_Dispensary_Additional Attachments_Affirmative Action Plan</td>
<td>TSG Affirmative Action Plan</td>
<td>Full version of reference TSG AAP; referenced in application</td>
</tr>
<tr>
<td>The Sentel Group_03172017_Dispensary_Additional Attachments_Dispensary Log Sheets</td>
<td>TSG Operations Log Sheets Notebook</td>
<td>To be used when in operation; Provided to demonstrate our ability to operate</td>
</tr>
<tr>
<td>The Sentel Group_03172017_Dispensary_Additional Attachments_Dispensary Standard Operating Procedures</td>
<td>TSG Dispensary Standard Operating Procedures</td>
<td>To be used when in operation; Provided to demonstrate our ability to operate</td>
</tr>
<tr>
<td>The Sentel Group_03172017_Dispensary_Additional Attachments_Employee Handbook</td>
<td>TSG Employee Handbook</td>
<td>Full version of TSG Employee Handbook; referenced in application</td>
</tr>
<tr>
<td>The Sentel Group_03172017_Dispensary_Additional Attachments_Physical Security Plan</td>
<td>TSG Physical Security Program Guide</td>
<td>Full version of TSG Physical Security Plan; referenced in application</td>
</tr>
<tr>
<td>The Sentel Group_03172017_Dispensary_Additional Attachments_Redacted Dispensary Log Sheets</td>
<td>TSG Operations Log Sheets Notebook (REDACTED)</td>
<td>Redacted version provided to protect proprietary information</td>
</tr>
<tr>
<td>The Sentel Group_03172017_Dispensary_Additional Attachments_Redacted Dispensary Standard Operating Procedures</td>
<td>TSG Dispensary Standard Operating Procedures (REDACTED)</td>
<td>Redacted version provided to protect proprietary information</td>
</tr>
<tr>
<td>The Sentel Group_03172017_Dispensary_Application_Employee Roles &amp; Qualifications Contd</td>
<td>Dispensary Application: Employee Roles &amp; Qualifications Contd</td>
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<td>The Sentel Group_03172017_Dispensary_Application_Employees Contd</td>
<td>Dispensary Application: Employees Contd</td>
<td>Not enough room provided on application</td>
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<tr>
<td>The Sentel Group_03172017_Dispensary_Application_Redacted Employees Contd</td>
<td>Dispensary Application: Redacted Employees Contd</td>
<td>Redacted version provided to protect sensitive information</td>
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</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).
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]

Owner, President/CEO

3/17/17

Signature

Title in Applicant's Business

Date

Russell T. Wright

Printed Name

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

[Signature]

Owner, President/CEO

3/17/17

Signature

Title in Applicant's Business

Date

Russell T. Wright

Printed Name

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

Instructions:
- Attach certified copies of the applicant's certificate of incorporation, partnership agreement, charter or other such documentation. If the applicant is not organized in Pennsylvania, attach 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>The SENTEL Group</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Principal Business Address: 143 Waterfront Street #203</th>
</tr>
</thead>
<tbody>
<tr>
<td>City: Oxon Hill</td>
</tr>
<tr>
<td>State: MD</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Zip Code: 20745</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phone: (571) 366-0815</td>
</tr>
<tr>
<td>----------------</td>
</tr>
<tr>
<td>Fax: (703) 342-3447</td>
</tr>
<tr>
<td>Email:</td>
</tr>
</tbody>
</table>

**DOH REDACTION**
Foreign Registration Statement

TCO170308JD0874

Name: cls-ctharrisburgfulfillment
Address: @wolterskluwer.com

Fee: $250

☐ I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. § 412 (relating to foreign registration statement), the undersigned foreign association hereby states that:

1. The type of association is (check only one):
   - ☐ Business Corporation
   - ☐ Nonprofit Corporation
   - ☑ Limited Liability Company
   - ☐ Limited Partnership
   - ☐ Limited Liability (General) Partnership
   - ☐ Limited Liability Limited Partnership
   - ☐ Business Trust
   - ☐ Professional Association

2. The full and proper name of the foreign association as registered in its jurisdiction of formation is:
   - The SENTEL Group, LLC

2A. If the name in 2 does not contain a required designator or if the name in 2 is not available for use in the Commonwealth, the alternate name under which the association is registering in this Commonwealth is:

3. The jurisdiction of formation is: Maryland

4. The street and mailing address of the association’s principal office.
   - 143 Waterfront Street #203
   - Oxon Hill, Maryland 20745

4A. The street and mailing address of the office, if any, required to be maintained by the law of the association’s jurisdiction of formation in that jurisdiction:

   - Number and street
   - City
   - State
   - Zip
5. The (a) address of the association's proposed registered office in this Commonwealth or (b) name of its Commercial Registered Office Provider and the county of venue is:

Complete part (a) OR (b) – not both:

(a) Number and street City State Zip County

OR

(b) c/o: CT Corporation System Dauphin County
Name of Commercial Registered Office Provider

6. Check one of the following:

☒ The association may not have series.
☐ The association may have one or more series.

7. Effective date of registration of foreign association (check, and if appropriate complete, one of the following):

☒ The Foreign Registration Statement shall be effective upon filing in the Department of State.
☐ The Foreign Registration Statement shall be effective on: _______ at _________ Hour (if any).

Date (MM/DD/YYYY)

8. To be completed by Limited Liability Companies only. Check, and if appropriate complete, one of the following:

☒ The association is a limited liability company which is not organized to render any of the below professional service(s).

☐ The association is a restricted professional limited liability company organized to render one or more of the following professional service(s): (If this box is checked, one or more of the fields below must be checked.)

□ Chiropractic □ Dentistry □ Law
□ Optometry □ Osteopathic medicine and surgery □ Medicine and surgery
□ Psychology □ Podiatric medicine □ Public accounting
□ Veterinary medicine

IN TESTIMONY WHEREOF, the undersigned association has caused this Foreign Registration Statement to be signed by a duly authorized representative thereof this 7th day of March, 2017.

The SENTEL Group, LLC

Name of Association

Manager

Title
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:
The SENTEL Group

Trade names and DBA (doing business as) names:
TSG

Principal Business Address: 143 Waterfront Street #203
City: Oxon Hill State: MD Zip Code: 20745
Phone: (571) 366-0815 Fax: (703) 342-4337

DOH REDACTION
March 2, 2017

Roy Brenner
Landmark Commercial Realty
20 Erford Road, Suite 215
Lemoyne, PA 17043

RE: 1241 Peters Mountain Road

Dear Roy:

On behalf of The Sentel Group ("Tenant"), EDGE Commercial is pleased to present the following proposal to Thabata Maher ("Landlord") that outlines the terms and conditions under which Tenant would enter into a lease agreement with Landlord. This proposal is subject to a fully ratified lease agreement.

Premises: Approximately 2,666 rentable square feet of space located in a retail storefront building ("Building")

Base Rental Rate: Tenant shall pay a Base Rental Rate of Eight and 33/100 Dollars ($8.33) per rentable square foot, on modified gross basis.

Term: The Term shall be Three (3) years.

Lease Commencement Date: The Lease Commencement Date is estimated to be January 1, 2018.

Escalation: At the conclusion of the first (1st) lease year, and each anniversary thereafter, the Base Rent shall increase by an amount equal to two and one half percent (2.5%) of the prior year's Base Rent.

Improvements/Condition of Premises: Landlord shall deliver the Premises in "as-is" condition. Any changes or improvements shall be subject to the requirements of the Lease, including the consent of the Landlord.

Use: Tenant shall use the Premises as a Medical Marijuana dispensary space and administrative office space to support said function.

Security Deposit: Landlord shall require a deposit in an amount to be determined based upon Landlord's review of Tenant's financials.

Assignment/Sublease: Subtenant shall have the right to assign and/or sublease the Premises, subject to the prior written approval of Landlord, which approval shall not be unreasonable withheld, conditioned or delayed.

Broker: EDGE Commercial, LLC ("Tenant's Broker") represents the

www.edgecre.com
Tenant in this proposed transaction. Landmark Commercial Realty represents the Landlord ("Landlord's Broker"). Both Tenant's Broker and Landlord's Broker shall be compensated per a separate agreement with the Landlord.

The enclosed shall provide an overview of the basic lease and sublease terms of the parties and shall not be legally binding until the full execution of a lease or sublease agreement incorporating these and other terms, to include consent by the Landlord. This proposal shall be subject to withdrawal, modification or change by either party prior to lease execution. It is expressly understood that Landlord may continue to continue to market the property.

Sincerely,

Cory J. Hoffman
EDGE Commercial, LLC

AGREED AND ACCEPTED:
Sentel Corporation, Tenant

By: [Signature]
Name: Angela Price
Title: Facilities Manager
Date: 3/9/17

Thabata Maher, Landlord

By: [Signature]
Name: Maher Thabata
Title: Owner
Date: 3/9/17
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: |
| The SENTEL Group |
| Trade names and DBA (doing business as) names: |
| TSG |
| Principal Business Address: 143 Waterfront Street #203 |
| City: Oxon Hill | State: MD | Zip Code: 20745 |
| Phone: (571) 366-0815 | Fax: (703) 342-4337 | Email: DOH REDACTION |
March 3, 2017

Thomas Posavec, SIOR
Landmark Commercial Realty Inc.
23 Erford Road, Suite 215
Lemoyne, PA 17043

RE: 3514 Trindle Road Camp Hill, PA 17011

Dear Alfred:

On behalf of The SENTEL Group ("Tenant"), EDGE Commercial is pleased to present the following proposal to the ____________________ ("Landlord"), that outlines the terms and conditions under which Tenant would enter into a lease agreement with Landlord. This proposal is subject to a fully ratified lease agreement.

Premises: Approximately 7,126 rentable square feet of space located in a industrial warehouse building ("Building") - 4100 sq. ft. for lease

Base Rental Rate: Tenant shall pay a Base Rental Rate of One Hundred and Five and 95/100 Dollars ($105.95) per rentable square foot.

Term: The Term shall be Three (3) years.

Lease Commencement Date: The Lease Commencement Date is estimated to be January 1, 2018.

Escalation: At the conclusion of the first (1st) lease year, and each anniversary thereafter, the Base Rent shall increase by an amount equal to two and one-half percent (2.5%) of the prior year's Base Rent.

Improvements/Condition of Premises: Landlord shall deliver the Premises in "as-is" condition. Any changes or improvements shall be subject to the requirements of the Lease, including the consent of the Landlord.

Use: Tenant shall use the Premises as a Medical Marijuana dispensary space and administrative office space to support said function.

Security Deposit: Landlord shall require a deposit in an amount to be determined based upon Landlord's review of Tenant's financials.

Assignment/Sublease: Subtenant shall have the right to assign and/or sublease the Premises, subject to the prior written approval of Landlord, which approval shall not be unreasonable withheld, conditioned or delayed.

Broker: EDGE Commercial, LLC ("Tenant's Broker") represents the www.edgecre.com
Tenant in this proposed transaction and shall be compensated per a separate agreement with the Landlord.

The enclosed shall provide an overview of the basic lease and sublease terms of the parties and shall not be legally binding until the full execution of a lease or sublease agreement incorporating these and other terms, to include consent by the Landlord. This proposal shall be subject to withdrawal, modification or change by either party prior to lease or sublease execution.

Sincerely,

[Signature]

Cory J. Hoffman
EDGE Commercial, LLC

AGREED AND ACCEPTED:
The SENTEL Group, Tenant

By: [Signature]
Name: Angele-Agee
Title: Facility Manager
Date: 3/11/17

Landlord

By: [Signature]
Name: [Signature]
Title: [Signature]
Date: 3/10/17
Attachment F: Affidavit of Business History

Instructions:

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

State of Virginia
County of King George

The undersigned, Russell Wright, hereby certifies the following:

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

<table>
<thead>
<tr>
<th>Name of individual</th>
<th>Role (principal, operator, financial backer or employee)</th>
<th>Business name and address</th>
<th>Position of management or ownership of a controlling interest</th>
<th>Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Russell Wright</td>
<td>Principal</td>
<td>DOH REDACTION</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I hereby certify that I am authorized to execute this affidavit on behalf of the applicant and that the information contained herein is true and correct and that there is no misrepresentation, falsification or omissions in this affidavit. I am further aware that any false or misleading statement or omitted information is punishable under the applicable provisions of 18 Pa. C.S. Ch. 49 (relating to falsification and intimidation).

Signature of Affiant and Title _2/22/17_

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

[Signature]

Notary Public

MY COMMISSION EXPIRES: 11/30/2017

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

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

State of Virginia            )
County of King George        ) ss:

The undersigned, Russell Wright, 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]
Owner, President / CEO

______________________________
Signature of Affiant and Title
Date 2/22/17

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

[Signature]
Notary Public

MY COMMISSION EXPIRES: 11/30/2017

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

Instructions:
- The applicant must submit an affidavit stating that the applicant meets the capital requirements set forth in §1141.30 (relating to capital requirements)
- Note that there are two different versions below:
  o Attachment I-1 is the affidavit for a grower/process applicant
  o Attachment I-2 is the affidavit for a dispensary applicant
- Execute the appropriate affidavit and save as a PDF file called "Attachment I," using the appropriate file name format. A cover sheet is not needed
COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH

AFFIDAVIT OF CAPITAL SUFFICIENCY

State of Virginia
County of King George

I/WE _______________ Michael Royer

DOH REDACTION

For the following applicant:
The SENTEL Group

NAME OF BUSINESS

143 Waterfront Street #203

ADDRESS _____________________________ (571) 366-0815 ________________ PHONE

Chesapeake MD 20745 Prince Georges
CITY STATE ZIP CODE COUNTY

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

I hereby certify that I am authorized to execute this affidavit on behalf of the applicant and that the information contained herein is true and correct and that there is no misrepresentation, falsification or omissions in this affidavit. I am further aware that any false or misleading statement or omitted information is punishable under the applicable provisions of 18 Pa. C.S. Ch. 49 (relating to falsification and intimidation).

[Signature]
Signature of Affiant and Title

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

[Signature]
Notary Public

MY COMMISSION EXPIRES: 11/30/2017

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>The SENTEL Group</td>
</tr>
<tr>
<td>Trade names and DBA (doing business as) names:</td>
</tr>
<tr>
<td>TSG</td>
</tr>
<tr>
<td>Principal Business Address: 143 Waterfront Street #203</td>
</tr>
<tr>
<td>City: Oxon Hill</td>
</tr>
<tr>
<td>State: MD</td>
</tr>
<tr>
<td>Zip Code: 20745</td>
</tr>
<tr>
<td>Phone: (571) 366-0815</td>
</tr>
<tr>
<td>Fax: (703) 342-4337</td>
</tr>
<tr>
<td>Email: DOH REDACTION</td>
</tr>
</tbody>
</table>
Attachment K: Release Authorization

Instructions:
- Execute the following release authorization
- Scan the completed and executed release authorization below save it as a PDF file called 'Attachment K,' using the appropriate file name format. No cover sheet is needed.
RELEASE AUTHORIZATION

TO: 

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

FROM: Russell Wright

Applicant’s Name

1. Russell Wright__________________________, 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 wilfully 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 \underline{22} day of \underline{Feb}, 2017.

\underline{\text{Signature}}

Authorized Signatory

\underline{\text{STATE OF Virginia}}
\underline{\text{COUNTY OF King George}}

\underline{\text{ss:}}

On this \underline{22nd} day of February 2017, before me, a Notary Public, personally appeared \underline{Russell Wright} (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.

\underline{\text{My Commission Expires: 11/30/2017}}

[Notary Public's Signature]

\underline{\text{Jacqueline J. Harding}}
\underline{\text{NOTARY PUBLIC}}
\underline{\text{Commonwealth of Virginia}}
\underline{\text{Reg. #359782}}
\underline{\text{My Commission Expires November 30, 2017}}
Attachment L: Applicant Priorities for Multiple Applications

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

Business Name, as it appears on the applicant’s certificate of incorporation, charter, bylaws, partnership agreement or other official documents:
The SENTEL Group

Trade names and DBA (doing business as) names:
TSG

Principal Business Address: 143 Waterfront Street
City: Oxon Hill  State: MD  Zip Code: 20745
Phone: (571) 366-0815  Fax: (703) 342-4337  Email: [REDACTED]

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 1</td>
</tr>
<tr>
<td>2- Northeast</td>
<td>Priority ___</td>
</tr>
<tr>
<td>3- Southcentral</td>
<td>Priority 2</td>
</tr>
<tr>
<td>4- Northcentral</td>
<td>Priority ___</td>
</tr>
<tr>
<td>5- Southwest</td>
<td>Priority 3</td>
</tr>
<tr>
<td>6- Northwest</td>
<td>Priority 4</td>
</tr>
</tbody>
</table>

[Signature]  [Date]
B. Priorities for Multiple Dispensary Permit Applications

Please check one of the following:

- [x] The applicant would like to make the Department aware of the applicant’s priorities as listed below
- [ ] The applicant has no preference regarding county

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

**Project Details**

<table>
<thead>
<tr>
<th>Date</th>
<th>Milestone</th>
<th>Baseline</th>
</tr>
</thead>
<tbody>
<tr>
<td>3-Jul</td>
<td>Dispensary License Issued (Project Start)</td>
<td>1</td>
</tr>
<tr>
<td>5-Jul</td>
<td>Architect and Building Design Plan Set Submitted for Permitting</td>
<td>1</td>
</tr>
<tr>
<td>14-Jul</td>
<td>Construction Permits Issued</td>
<td>1</td>
</tr>
<tr>
<td>17-Jul</td>
<td>Construction Begins</td>
<td>1</td>
</tr>
<tr>
<td>18-Nov</td>
<td>Construction Complete</td>
<td>1</td>
</tr>
<tr>
<td>19-Nov</td>
<td>Employee Screening and Hiring Process Begins</td>
<td>1</td>
</tr>
<tr>
<td>19-Nov</td>
<td>Security System Install</td>
<td>1</td>
</tr>
<tr>
<td>22-Nov</td>
<td>Employee Hiring Process Complete</td>
<td>1</td>
</tr>
<tr>
<td>23-Nov</td>
<td>American Cannabis Company begin Employee Training</td>
<td>1</td>
</tr>
<tr>
<td>23-Nov</td>
<td>Training Begin</td>
<td>1</td>
</tr>
<tr>
<td>30-Nov</td>
<td>Training Complete</td>
<td>1</td>
</tr>
<tr>
<td>2-Dec</td>
<td>DOH Operational Inspection</td>
<td>1</td>
</tr>
<tr>
<td>3-Dec</td>
<td>Begin Dispensary Operations (Project End)</td>
<td>1</td>
</tr>
</tbody>
</table>
The TSG Group (TSG)

AFFIRMATIVE ACTION PLAN
TSG CORPORATION

2015

AFFIRMATIVE ACTION PLAN
For Individuals with Disabilities and Protected Veterans
EEO Policy Statement

It is the policy of TSG Corporation (the “Company”) to not discriminate against any employee or applicant for employment because of race, color, creed, religion, national origin, gender, sexual orientation, age, gender identity, genetic information, disability, or protected veteran status, or any other status protected by state or local law, and to provide equal employment opportunity and affirmative action for qualified individuals. This policy statement is included in this Affirmative Action Program and is posted on Company bulletin boards.

The Company will endeavor to recruit, hire, train, and promote persons in all job titles in accordance with this Affirmative Action Program. All other personnel actions are administered without regard to race, color, creed, religion, national origin, gender, sexual orientation, age, gender identity, genetic information, disability, or protected veteran status, or any other status protected by state or local law, and all employment decisions are based only on valid job requirements.

The Veteran and Disabled Affirmative Action Plan shall be available to any employee or employment applicant for inspection in the Human Resources Department during normal business hours.

Russell L. Wright, Chairman & CEO fully supports this policy and has assigned The HR Division and the Compliance and Diversity Division with overall responsibility for: annually updating the Affirmative Action Plan and the implementation of affirmative action activities as required by law.

The above mentioned divisions’ responsibilities include designing and implementing an audit and reporting system that will:

- Measure the effectiveness of the Company’s Affirmative Action Program.
- Indicate any need for remedial action.
- Determine the degree to which our objectives have been attained.
- Determine whether individuals with known disabilities and protected veterans have had the opportunity to participate in all Company-sponsored educational, training, recreational, and social activities.
- Measure compliance with the Affirmative Action Program’s specific obligations.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged 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 Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, as amended, Section 4212 of the Vietnam Era Veterans Readjustment Assistance Act of 1974, the Veterans Employment Opportunities Act of 1998 or any other Federal, State or local law requiring equal opportunity for individuals regardless of race, color, creed, religion, national origin, gender, sexual orientation, age, gender identity, genetic information, disability, or protected veteran status.
- Opposing any act or practice made unlawful by Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, or its implementing regulations, Section 4212 of the Vietnam Era Veterans Readjustment Assistance Act of 1974, the Veterans Employment Opportunities Act of 1998 or any other Federal, State or local law requiring equal opportunity for individuals regardless of their race, color, creed, religion, national origin, gender, sexual orientation, age, gender identity, genetic information, disability, or protected veteran status.

Russell L. Wright, Chairman & CEO
II. 60-741.5/60-300.5 EQUAL OPPORTUNITY CLAUSE

(a) Equal Opportunity for Individuals with Disabilities and Protected Veterans. TSG Corporation will not discriminate against any employee or applicant for employment because of physical or mental disability or protected veteran status in regard to any position for which the employee or applicant for employment is qualified. TSG Corporation agrees to take affirmative action to employ, advance in employment, and otherwise treat qualified individuals with disabilities and qualified protected veterans without discrimination based on their physical or mental disability or protected veteran status in all employment practices, including the following:

(i) Recruitment, advertising, and job application procedures;

(ii) Hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff, termination, right of return from layoff and rehiring;

(iii) Rates of pay or any other form of compensation and changes in compensation;

(iv) Job assignments, job classifications, organizational structures, position descriptions, lines of progression and seniority lists;

(v) Leaves of absence, sick leave, or any other leave;

(vi) Fringe benefits available by virtue of employment, whether or not administered by TSG Corporation;

(vii) Selection and financial support for training, including apprenticeship and on the job training, professional meetings, conferences, and other related activities, and selection for leaves of absence to pursue training;
(viii) Activities sponsored by TSG Corporation including social or recreational programs; and

(ix) Any other term, condition, or privilege of employment.

TSG Corporation agrees to list all employment openings with the local employment service delivery system (ESDS) where the opening is located and by any manner and format permitted by the appropriate ESDS which will allow that system to provide priority referrals of protected veterans. All employment openings will be listed except: executive and top management positions, those positions that will be filled from within the Company’s organization, and positions lasting three days or less. The term “employment openings” includes full time employment, temporary employment of more than three days duration and part-time employment. Listings with employment services will be concurrent with the use of any other job search firm and their contact information will be provided to the ESDS. The ESDS will be advised of the company’s status as a federal contractor, contact information for the hiring official in each location in the state, and request for priority referrals of protected veterans.


In the event of the TSG Corporation’s non-compliance with the requirements of this clause, actions for non-compliance may be taken in accordance with the rules, regulations and relevant orders of the Secretary of Labor issued pursuant to the Acts.
TSG Corporation agrees to post in conspicuous places, available to employees and applicants for employment, notices in a form to be prescribed by the Deputy Assistant Secretary for Federal Contract Compliance Programs. Such notices shall state the rights of applicants and employees as well as TSG Corporation’s obligation under the law to take affirmative action to employ and advance in employment qualified individuals with disabilities and qualified protected veterans. TSG Corporation will ensure that individuals with disabilities and protected veterans are informed of the contents of the notice. For example, TSG Corporation may have the notice read to a visually disabled individual, or may lower the posted notice so that a person in a wheelchair might read it. With respect to employees who do not work at one of the TSG Corporation physical locations, TSG Corporation will satisfy its posting obligation by posting such notices in an electronic format ensuring that such employees have access to the electronic posting notice. When utilizing an electronic job posting application system, TSG Corporation, will provide an electronic notice, included in a conspicuous manner with or as part of the electronic application, informing job applicants of their rights.

There is no union representation within our establishment.

TSG will include the provisions of this clause in every subcontract in excess of $100,000 and in purchase orders so that such provisions will be binding upon each subcontractor or vendor. Exemptions may be applied in accordance with the rules, regulations, or orders of the Secretary issued pursuant to section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans Readjustment Assistant Act of 1974, and the Veterans Employment Opportunities Act of 1998, as amended. TSG Corporation will take such action with respect to any subcontract or purchase order as the Deputy Assistant Secretary for Federal Contract
Compliance Programs may direct to enforce such provisions, including action for non-compliance.

(a) **Subcontracts.** TSG Corporation will include the equal opportunity clause in each of its subcontracts subject to this part.

(b) **Adaption of Language.** Such necessary changes in language may be made to the equal opportunity clause as shall be appropriate to identify properly the parties and their undertakings.

(c) **Inclusion of the Equal Opportunity Clause (EO) in the Contract.** It is not necessary that the equal opportunity clause be quoted verbatim in any contract, subcontract, or purchase order. The EO clause will be made a part of the contract by citation to 41 CFR 60-741 and 41 CFR 60-300.5(a) and by inclusion of the prescribed language, in bold text.

(d) **Incorporation by Operation of the Act.** By operation of the Act, the equal opportunity clause shall be considered to be a part of every contract and subcontract required by the Acts and the regulations in this part to include such a clause. This applies whether or not it is physically incorporated in such contract and whether or not there is a written contract between the agency and TSG Corporation.
III. 60-741.40/60-300.40 APPLICABILITY OF THE AFFIRMATIVE ACTION PROGRAM REQUIREMENT

(a) This Affirmative Action Plan has been prepared in accordance with the provisions of Subpart C - Affirmative Action Program.

(c) This Affirmative Action Plan is reviewed and updated annually.

(d) This Plan will be submitted within 30 days of a request from the OFCCP, unless the request provides for a different timeframe. TSG Corporation will make the Affirmative Action Plan promptly available upon the OFCCP’s request.
IV. 60-741.41/60-300.41 AVAILABILITY OF AFFIRMATIVE ACTION PROGRAM

The Affirmative Action Plan, absent the data metrics, is available to any employee or applicant for employment for inspection upon request. The location and hours during which the Plan may be obtained is posted on Company bulletin boards.
V. 60-741.42/60-300.42 Invitation To Self-Identify

TSG Corporation will invite applicants to inform the contractor whether the applicant believes that he or she is an individual with a disability or a protected veteran who may be covered by the Act. This invitation may be included in the application materials for the position, but in any circumstance shall be provided to applicants prior to making an offer of employment to a job applicant.

In addition to the pre-offer invitation TSG Corporation will invite applicants to inform the contractor whether the applicant believes that he or she is an individual with a disability and whether he or she belongs to one or more of the specific categories of protected veteran for which the contractor is required to report under the regulations. Such an invitation shall be made at any time after the offer of employment but before the applicant begins his or her job duties. The invitation invites the individual to express any wishes to benefit under the Affirmative Action Program. A copy of the Invitation to Self Identify is included at the end of this section.

The invitation states that a request to benefit under the Affirmative Action Program may be made immediately and/or at any time in the future. The invitation also summarizes the relevant portions of the Act and the Affirmative Action Program.

Furthermore, the invitation states that the information is being requested on a voluntary basis, that it will be kept confidential, that refusal to provide it will not subject the applicant to any adverse treatment, and that it will not be used in a manner inconsistent with the Act. If an applicant so identifies himself or herself as an individual with a disability or a disabled veteran in the post-offer self-identification, TSG Corporation will inquire of the
applicant whether an accommodation is necessary, and if so, will engage with the applicant regarding reasonable accommodation.

TSG Corporation may also make such inquiries to the extent they are consistent with the ADA (e.g., in the context of asking applicants to describe or demonstrate how they would perform the job). The contractor will maintain a separate file of all medical examinations and inquiries on persons who have self-identified as an individual with a disability or a disabled veteran.

TSG Corporation will keep all information on self-identification confidential and provide the information to the OFCCP upon request. This information will be used only in accordance with these regulations. If an applicant identifies himself or herself as an individual with a disability or a disabled veteran in the post-offer self-identification detailed in paragraph (b) of this section, the contractor should inquire of the applicant whether an accommodation is necessary, and if so, should engage with the applicant regarding reasonable accommodation. The contractor may make such inquiries to the extent they are consistent with the Americans with Disabilities Act of 1990 (ADA), 42 U.S.C. 12101, et seq. The contractor shall maintain a separate file in accordance with § 60-741.23(d) on an individual with a disability and § 60-300.23(d) on persons who have self-identified as disabled veterans.

Nothing in this section relieves TSG Corporation of its obligation to take affirmative action with respect to those applicants or employees who are known to the contractor to be an individual with a disability or a protected veteran.

Nothing in this section relieves TSG Corporation from liability for discrimination under the Act.
TSG Corporation

INVITATION TO SELF-IDENTIFY NOTICE

This employer is a Government contractor subject to section 503 of the Rehabilitation Act of 1973, as amended, and the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002, 38 U.S.C. 4212 (VEVRAA), which requires Government contractors to take affirmative action to employ and advance in employment: (1) disabled veterans; (2) recently separated veterans; (3) active duty wartime or campaign badge veterans; and (4) Armed Forces service medal veterans under 41 CFR 61-300.

If you are an individual with a disability, a protected veteran, a pre-JVA veteran or a pre-JVA special disabled veteran and would like to be considered under the affirmative action program, please tell us. You may inform us of your desire to benefit under the program at this time and/or at any time in the future. This information will assist us in placing you in an appropriate position and in making accommodations. The affirmative action plan is available for inspection in the Human Resources Department during normal business hours.

Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment.

Information you submit related to your disability will be kept confidential, except that (i) supervisors and managers may be informed regarding job related work restrictions and any necessary accommodations; (ii) first aid and safety personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment; and (iii) Government officials engaged in enforcing laws administered by the OFCCP or the Americans with Disabilities Act, may be informed. The information provided will be used only in ways that are consistent with the laws referenced above.

1/1/2015
VI. 60-741.43/60-300.43 AFFIRMATIVE ACTION POLICY

It is the policy of TSG Corporation not to discriminate against individuals because of their physical or mental disability or veteran status and to take affirmative action to employ and advance in employment qualified individuals with disabilities and qualified protected veterans at all levels of employment, including the executive level. Such actions apply to all employment activities.
VII. 60-741.44/60-300.44 REQUIRED CONTENTS OF
AFFIRMATIVE ACTION PROGRAMS

(a) POLICY STATEMENT

It is the policy of TSG Corporation not to discriminate against individuals because of their physical or mental disabilities or protected veteran status and to provide equal employment opportunity and affirmative action for qualified individuals with disabilities and qualified protected veterans. The policy statement is included in this Affirmative Action Plan and is posted on Company bulletin boards.

TSG Corporation will provide applicants and employees who identify as individuals with a disability or a disabled veteran the notice in a form that is accessible and understandable to the individual with a disability or disabled veteran (e.g., providing Braille or large print versions of the notice, or posting the notice for visual accessibility to persons in wheelchairs).
(b) **Review of Personnel Processes**

TSG Corporation’s personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities and known protected veterans for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. When protected veterans are considered for employment, TSG Corporation relies only on that portion of the applicant’s military record, including his or her discharge papers, relevant to the requirements of the opportunity in issue. TSG Corporation’s personnel processes do not stereotype individuals with disabilities or protected veterans in a manner which limits their access to all jobs for which they are qualified. TSG Corporation will ensure that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies. TSG Corporation will provide necessary reasonable accommodation to ensure applicants and employees with disabilities and protected veterans receive equal opportunity in the operation of personnel processes. Personnel processes will be periodically reviewed and TSG Corporation will make any necessary modifications to ensure that these obligations are carried out. A description of the review and any necessary modifications to personnel processes or development of new processes will be included in the affirmative action program required under this part.

To ensure that these obligations are carried out, examples of procedures that may be developed as a result of these reviews are:

(1) The application or personnel form of each known individual with a disability or
known protected veteran should be annotated to identify each vacancy for which the applicant was considered. The forms will be retrievable for review by the Department of Labor and TSG Corporation’s officials for use in investigations and internal compliance activities.

(2) The personnel or application records of each known individual with a disability or known protected veteran should include:

(i) The identification of each promotion for which the employee with a disability or protected veteran was considered, and

(ii) The identification of each training program for which the individual with a disability or protected veteran was considered.

(3) In each case where an employee or applicant who is an individual with a disability or protected veteran is rejected for employment, promotion, or training, a statement of the reason will be appended to the personnel file or application form as well as a description of the accommodations considered. The statement of the reason for rejection (if the reason is medically related), and the description of the accommodations considered, will be treated as confidential medical records. This statement will be available to the applicant or employee concerned upon request.

(4) Where applicants or employees are selected for hire, promotion, or training and TSG Corporation undertakes any accommodation which makes it possible to place an individual with a disability or protected veteran on the job, the application form or personnel record will contain a description of that accommodation and the record will be treated as a confidential medical record.
(c) **Physical and Mental Qualifications**

(1) All physical and mental job qualification standards for positions will be reviewed to ensure that, to the extent that qualification standards tend to screen out qualified individuals with disabilities or qualified disabled veterans, they are job-related for the position in question and are consistent with business necessity.

(2) Whenever TSG Corporation applies physical or mental job qualification standards in the selection of applicants or employees for employment or other change in employment status such as promotion, demotion or training, consideration will be given to the following: to the extent that qualification standards tend to screen out qualified individuals with disabilities or qualified disabled veterans, the standards shall be related to the specific job or jobs for which the individual is being considered and are consistent with business necessity.

(3) TSG Corporation may use as a defense to an allegation of a violation of paragraph (c)(2) of this section that an individual poses a direct threat, as defined in the regulations, to the health or safety of the individual or others in the workplace. Once TSG Corporation believes that a direct threat exists, TSG Corporation shall create a statement of reasons supporting its belief, addressing each of the criteria for “direct threat” listed in the regulations. This statement shall be treated as a confidential medical record and shall be retained as an employment record subject to the recordkeeping requirements.
(d) **Reasonable Accommodation to Physical and Mental Limitations**

TSG Corporation will make reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability or qualified disabled veteran unless it can demonstrate that the accommodation would impose an undue hardship on the operation of its business. If an employee who is known to be a disabled individual or disabled veteran is having significant difficulty performing his or her job, and it is reasonable to conclude that the performance problem may be related to their known disability, TSG Corporation will confidentially notify the employee of the performance problem. Inquiry will be made as to whether the problem is related to the employee’s disability. If the employee responds affirmatively, TSG Corporation will confidentially inquire whether the employee is in need of a reasonable accommodation.
(e) **HARASSMENT**

TSG Corporation will develop and implement procedures to ensure those employees with disabilities and protected veterans are not harassed because of their disability or protected veteran status.
(f) & (g) **OUTREACH AND POSITIVE RECRUITMENT; INTERNAL & EXTERNAL DISSEMINATION OF POLICY**

(1) **Required Outreach Efforts**

TSG Corporation’s shall undertake and design appropriate outreach and positive recruitment activities, outlined in this section, to effectively recruit qualified individuals with disabilities and protected veterans.

Additionally, TSG Corporation recognizes that the success of our outreach program is dependent upon internal support from supervisory and management personnel and other employees who may have had contact with individuals with disabilities and protected veterans in the past. In order to assure greater employment cooperation and participation in our efforts, TSG Corporation will implement the internal procedures outlined in this section. These procedures will be designed to communicate and promote the Company’s obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities and qualified protected veterans. It is intended that these procedures will foster understanding, acceptance and support among executive, management, supervisory and other employees and to encourage such persons to take the necessary actions to aid us in meeting our obligations.

The scope of recruitment efforts and internal practices will be determined with consideration to all circumstances, including current resources.
(2) Examples of outreach and recruitment activities

Examples of existing and forecasted external and internal dissemination and implementation, as well as outreach and positive recruitment activities are as follows:

- Post all pertinent policies on Company bulletin boards and Company intranet. Conduct periodic audits to ensure pertinent policies and all required state and federal posters are appropriately displayed as required.
- Include the required equal employment opportunity clause mandatory language on all government contracts, as well as on all sub-contracts or purchase orders.
- Include the EEO tag line in all recruitment solicitations or employment advertisement placed by or on behalf of the contractor.
- File the VETS-4212 report annually.
- List all full-time and part-time employment openings with the local employment service office in any “manner and format” that the appropriate employment service delivery system (ESDS) permits that will allow it to provide priority referrals of protected veterans.
- EEO policy statement to include top United States executive’s support for the Affirmative Action Plan.
- Conduct an annual review of personnel processes to provide for careful, thorough and systematic consideration for equal access of all applicants and employees who are known to be disabled and/or a protected veteran for all job vacancies and training opportunities.
- Develop and adhere to a schedule for the periodic review and update of position descriptions, including all physical and mental job qualification standards, tests and other selection criteria to ensure they are consistent with job relatedness and business necessity and include only valid, job related criteria.
- Make reasonable accommodations to the known physical or mental limitations of an otherwise qualified disabled veteran, Pre-JVA special disabled veteran, or individual with a disability unless it can demonstrate that the accommodation would impose an undue hardship on the operation of its business.
• Develop and implement procedures to ensure that employees are not harassed because of their protected veteran or disability status.

• Invite voluntary self-identification of individuals with disabilities (IWD) at the pre-offer and post-offer stages of employment, using the mandatory required OFCCP form; invite voluntary self-identification of protected veteran at pre-offer and post-offer stages of employment.

• Review and revise qualification standards, tests and other selection criteria to ensure job relatedness and business necessity.

• Ensure that compensation is not reduced because of disability benefits or the actual or anticipated cost of the individual’s reasonable accommodation.

• Ensure that policy/process regarding voluntary medical examinations and activities reflects that these need not be job related and consistent with business necessity.

• Include the EEO Policy in the Company policy manual, or otherwise make the policy available to its employees.

• Inform all employees and prospective employees of the company’s commitment to engage in affirmative action to increase employment opportunities for protected veterans and individuals with disabilities.

• Document the following computations or comparisons pertaining to applicants and hires on an annual basis and maintain them for a period of three (3) years: (1) The number of applicants who self-identified as protected veteran or individuals with disabilities or who are otherwise known to be individuals with disabilities; (2) The total number of job openings and total number of jobs filled; (3) The total number of applicants for all jobs; (4) The number of protected veteran applicants hired, the number of applicants with disabilities hired; and (5) The total number of applicants hired.

• Develop and implement an Educational Assistance Program and communicate the availability to all employees.

• Develop and utilize workforce flexibility programs in order to attract and retain employees.
• Develop and utilize summer, co-op and/or internship programs that promote the employment of protected class members.
• Develop and implement an Employee Assistance Program and communicate the availability to all employees.
• Feature pictures of minority and/or female employees, accomplishments, promotions of same, and publish articles covering EEO programs in Company publications.
• Require Human Resources and/or Senior Management review and approval for all hires to ensure compliance with established Company guidelines.
• Post open positions at any of the following: web-sites, secondary schools, professional organizations, trade and association journals; and/or participate in job fairs, targeting protected class members.
• Develop and utilize an employee referral system, encouraging all employees to participate.
• Consistently post promotional and/or transfer opportunities.
• Review all pertinent employment records when making competitive promotion selections.
• Ensure that seniority practices do not have a discriminatory effect.
• Require management personnel to submit written justification when apparently qualified protected group members are passed over for advancement.
• Require Human Resources and/or Senior Management approval for review and all terminations to ensure compliance with established Company guidelines.
• Develop and utilize a progressive discipline/termination policy and/or process for the resolution of employee performance issues for all involuntary terminations.
• Conduct exit interviews on a consistent basis.
• Require Human Resources and/or Senior Management review and approval for all layoffs/reductions in force to ensure compliance with established Company guidelines.
• Develop and consistently utilize a layoff/reduction in force policy and/or process when such actions occur.
• Require Human Resources and/or Senior Management review and approval for all job offers to ensure compliance with established compensation guidelines.
• Review exempt/non-exempt designations to ensure full compliance with FLSA regulations.
• Develop and consistently utilize a formal performance evaluation and merit increase program and train management personnel on the process.

The following Action-Oriented Program(s) will be implemented in the coming year:

• Provide equal opportunity to qualified disabled veterans, Pre-JVA special disabled veterans and individuals with disabilities to online application systems by making reasonable accommodation to ensure equal access for submitting to job openings.
• Make the full Individuals with Disabilities and Protected Veterans Affirmative Action Plan, absent the data metrics, available to any employee or applicant for employment upon request.
• Enlist assistance and support of specialized recruiting sources/organizations from the OFCCP expanded list and establish meaningful contacts in recruiting and developing on-the-job training opportunities in order to provide employment opportunities for protected veterans and individuals with disabilities.
• Send written notification of Company policy related to its affirmative action efforts to all subcontractors, vendors, and suppliers, requesting appropriate action on their part.
• Incorporate special efforts to reach individuals with disabilities and protected veterans when recruiting at schools and educational institutions.
• Make available protected veterans and individuals with disabilities for participation in career days, youth motivation programs, and related activities in their communities.
• Document and annually evaluate all outreach and recruitment activities. Maintain the data collected for the current and two prior AAP years.
• Publicize in the company newsletter, magazine, annual report, and other media its commitment to engage in affirmative action to increase employment opportunities for protected veterans and individuals with disabilities.

• Conduct special meetings with executive, management, and supervisory personnel to explain the intent of the affirmative action policy and individual responsibility for effective implementation, making clear the top Chief Executive Officer’s support for the Affirmative Action Policy.

• Discuss the policy thoroughly in both employee orientation and management training programs.

• Feature pictures of protected veterans and individuals with disabilities and accomplishments of same in company publications.

• Design and implement an audit and reporting system that will measure the success of the affirmative action program and take any necessary action to address identified deficiencies.

• Train all personnel involved in recruitment, screening, selection, promotion, disciplinary and related processes to ensure the commitments in the affirmative action program are implemented.

• Conduct employee satisfaction surveys on a periodic basis.

• Establish meaningful contacts and working relationships with specialized recruiting sources, community agencies, and/or organizations for protected class members.

• Require Human Resources and/or Senior Management review and approval for all promotions to ensure compliance with established Company guidelines.

• Conduct adverse impact analyses prior to a layoff/reduction in force.

• Develop and consistently utilize salary ranges to ensure equity in position salaries.

• Conduct periodic pay equity analyses and determine salary adjustments through a process that includes measurable components.
(3) **Assessment of external outreach and recruitment efforts.**

TSG Corporation’s shall, on an annual basis, review the outreach and recruitment efforts it has taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified individuals with disabilities and qualified protected veterans. TSG Corporation shall document each evaluation, including, at a minimum, the criteria it used to evaluate the effectiveness of each effort and the contractor’s conclusion as to whether each effort was effective. Among these criteria, shall be the data collected pursuant to paragraph (k) of this section for the current year and the two most recent previous years. TSG Corporation’s conclusion as to the effectiveness of its outreach efforts must be reasonable as determined by OFCCP in light of these regulations. If TSG Corporation concludes the totality of its efforts were not effective in identifying and recruiting qualified individuals with disabilities and protected veterans, it shall identify and implement alternative efforts in order to fulfill its obligations.

(4) **Recordkeeping obligation**

TSG Corporation shall document all activities it undertakes to comply with the regulations of this section, and retain these documents for a period of three (3) years.
(h) **Audit and Reporting System**

TSG Corporation shall design and implement an audit and reporting system that will:

i. Measure the effectiveness of the Company’s Affirmative Action Program.

ii. Indicate any need for remedial action;

iii. Determine the degree to which our objectives have been attained;

iv. Determine whether individuals with disabilities and known protected veterans have had the opportunity to participate in all Company-sponsored educational, training, recreational, and social activities;

v. Measure compliance with the Affirmative Action Program’s specific obligations;

vi. Document the actions taken to comply with the obligations of paragraphs (h)(i) through (v) of this section, and retain these documents as employment records subject to the recordkeeping requirements.

Where the affirmative action program is found to be deficient, TSG Corporation shall undertake necessary action to bring the program into compliance.
(i) **RESPONSIBILITY FOR IMPLEMENTATION**

The EEO Coordinator, named in the Facility ID statement, is the Company individual assigned responsibility for implementation of TSG Corporation’s affirmative action activities. The EEO Coordinator’s identity appears on all internal and external communications regarding the Company’s Affirmative Action Program. This individual will be given necessary top management support and staff to manage the implementation of this Program.
(j) **TRAINING**

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes will be trained to ensure that the commitments in this Affirmative Action Plan are implemented.
(k) **DATA COLLECTION ANALYSIS**

TSG Corporation shall document the following computations or comparisons pertaining to applicants and hires on an annual basis and maintain them for a period of three (3) years:

1. The number of applicants who self-identified as an individual with disability or a protected veteran or who are otherwise known to be an individual with disability;
2. The total number of job openings and total number of jobs filled;
3. The total number of applicants for all jobs;
4. The number of individuals with disabilities and protected veteran applicants hired, and;
5. The total number of applicants hired.
VII. 60-741.45/60-300.45 Utilization Goals/Benchmarks

The utilization goal or benchmark, as applicable, is not a rigid and inflexible quota which must be met, nor is it to be considered either a ceiling or a floor for the employment of particular groups. Quotas are expressly forbidden.

TSG Corporation shall annually evaluate its utilization of individuals with disabilities in each job group, or in its entire workforce as provided in paragraph (d)(2)(i) of this section.

- Establish a utilization goal of 7% for the employment of qualified individuals with disabilities for each job group.

TSG Corporation shall establish a benchmark for protected veterans by adopting the OFCCP National Percentage of Veterans in the Civilian Labor Force or develop Individualized Hiring Benchmarks based on the five specified factors.

- Adopt OFCCP National benchmark for hiring Protected Veterans in the civilian labor force.
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Retail Log Sheets
DOH REDACTION

DOH REDACTION
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1.0 INTRODUCTION

1.1 ABOUT THIS HANDBOOK

The Sentel Group, LLC (herein referred to as TSG) has always believed in promoting an atmosphere of open communication and cooperation among all of our personnel. This Employee Handbook reflects that thinking. It supersedes in all respects any prior employee handbook, policy manual, benefits or practices of TSG. This handbook has been prepared to provide our employees with general information about TSG’s benefits, and the highlights of rules and policies under which we operate. The INTRANET version of this handbook is the most current. As the employee, you are advised to print a copy from the INTRANET for the purpose of convenient reference. Obviously, we could not begin to explain every TSG policy, rule or benefit in this Handbook, and its provisions can be considered as no more than general summaries of the benefits, work rules and policies they address.

TSG will make every effort to maintain policies and procedures consistent with positive employee morale and good business goals. From time to time, TSG may unilaterally, at its discretion, amend, supplement, modify, or eliminate one or more of the benefits, work rules or policies, without prior notice.

1.1a EMPLOYMENT AT-WILL

It is the policy of TSG to establish and maintain an "at-will" relationship with its entire work force. In doing so, TSG has established that this Handbook does not constitute a guarantee that your employment will continue for any specified period of time or end only under certain conditions. Nothing in this Handbook constitutes an express or implied contract of employment or warranty of any benefits. Employment at TSG is a voluntary employment-at-will relationship for no definite period of time. While we hope to have a long and mutually beneficial working relationship together, regardless of anything which may appear in this Handbook or any other TSG publication, policy, statement or practice, you have the right to terminate your employment relationship for any reason with or without cause or notice at any time, and TSG reserves the right to do the same.

Advance discussions by TSG to the employee and a notice of separation from the employee to TSG is encouraged to hopefully prevent any misunderstandings or unfortunate separations.

No one has authority to bind TSG to any agreement contrary to the foregoing except our President & CEO, in writing.
1.2  A WELCOME FROM RUSSELL WRIGHT, TSG’S PRESIDENT & CEO

On behalf of your colleagues, I welcome you to TSG and wish you much success.

I believe TSG’s most valuable asset is its employees. Our employees, who are selected based on their specialized skills and winning customer relation capabilities, come first. Daily, they help increase efficiencies and mission effectiveness by providing leading solutions to some of the most complex issues facing our customers. Therefore, I hope you will take pride in being a member of our team.

This handbook was developed to describe what TSG expects of our employees and to outline the policies, programs and benefits available to all eligible employees. Please take the time to familiarize yourself with the contents of the employee handbook as soon as possible, for it will answer many questions about your employment with TSG.

I hope that your experience here will be challenging, rewarding and enjoyable. Again, welcome!

1.3  THE HISTORY OF TSG

Founded in 2015, TSG is a wholly-owned subsidiary of R&R Enterprises, LLC (R&R). R&R (formerly known as WC Holdings, LLC) is also the parent company to two other powerhouse entities, SENTEL Corporation and Brilliant Innovations, both of which provide award-winning services in the areas of logistics, engineering, information technology, and mission support. SENTEL Corporation (SENTEL), an internationally recognized defense industry government contracting firm founded in 1987 and headquartered in Alexandria, Virginia (shown in image above), currently has over 700 employees in 30 locations throughout the U.S., to include several sites in foreign countries like Afghanistan, Southwest Asia and Korea. Brilliant Innovations (Brilliant) is an Engineering solutions firm based in Glen Allen, Virginia that was birthed from SENTEL’s phenomenal success in the Engineering sector, including its leading advancements in the Internet of Things (IoT) revolution. TSG’s success strategy has, in part, been based on the blended business plans and principles of these verifiably successful predecessor organizations, both of which have generated a combined revenue of over $100M in FY2016.

A certified Minority Business Enterprise (MBE) as registered by the Capital Region Minority Supplier Development Council (CRMSDC), TSG leverages its parent company’s ISO 9001:2008 and CMMi Level 2 certifications to implement streamlined practices and money-saving processes. In addition, with a senior leadership team that brings to bear nearly six decades of verifiable domestic and international business experience in delivering a broad range of innovative technologies in science, research, and development, TSG is positioned for impactful growth and rapid success.
The principal objective of TSG is to improve patient healthcare by developing and implementing an innovative, safe and effective system of providing medical cannabis to qualifying patients and caregivers. To this end, the State of Maryland, Department of Health and Mental Hygiene Natalie M. LaPrade Maryland Medical Cannabis Commission (MMCC) has awarded TSG a Stage One Dispensary License in Senatorial District 23, located in Prince George’s County, Maryland. Competing with over 800 applicants, TSG’s pre-approval license is one of only 102 dispensary licenses awarded by the state of Maryland, and was publicly announced by the MMCC on December 9, 2016.

1.4 OUR EQUAL EMPLOYMENT OPPORTUNITY (EEO) POLICY

It is our policy to recruit, hire, train, and promote individuals, as well as administer any and all personnel actions, without regard to race, color, religion, creed, age, sex, national origin or ancestry, marital status, status as a disabled or Vietnam era veteran, union affiliation status as a qualified individual with a disability, in accordance with applicable laws. TSG has, on many occasions, expressed support and commitment to the principle of equal employment opportunity. TSG will not tolerate any unlawful discrimination and any such conduct is prohibited.

TSG also prohibits any harassment based on the legally protected categories set forth above. Harassment is verbal or physical conduct that denigrates or shows hostility or aversion towards an individual because of these protected attributes, and that (1) has the purpose or effect of creating intimidating, hostile, or offensive working environment as defined by law; or (2) has the purpose or effect of unreasonably interfering with an individual's work performance; or (3) otherwise adversely affects an individual's employment opportunities.

Any employee, regardless of position or title, will be subject to severe discipline, up to and including discharge, should TSG determine that the employee is engaged in unlawful harassment or discrimination. TSG will promptly and thoroughly investigate the facts and circumstances of any harassment or discrimination claim.

If you feel you are being unlawfully harassed or discriminated against, report this to your Supervisor immediately, or if you prefer, report the problem to your Program Manager, Group Vice President or the Human Resources Director. No one will be subject to, and TSG prohibits, any form of discipline or retaliation for reporting incidents of unlawful harassment or discrimination or pursuing any such claim.

1.5 OUR POLICY AGAINST SEXUAL HARASSMENT

Sexual harassment is a form of sex discrimination that violates Title VII of the Civil Rights Act of 1964.
In particular, it is illegal and strictly against TSG policy for any employee, male or female, regardless of title or status, to harass another employee by: making or subjecting any person to unwelcomed sexual advances, unwelcomed requests for sexual favors, or to engage in any unwelcomed verbal or physical conduct of a sexual nature, where submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, or submission to or rejection of such conduct is used as the basis for an employment decision affecting the individual exposed or subjected to such conduct, or

1. where such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Sexual harassment can occur in a variety of circumstances, including but not limited to the following:

1. The victim as well as the harasser may be a man or a woman. The victim does not have to be of the opposite sex.

2. The harasser can be the victim's supervisor, an agent of the employer, a supervisor in another area, a co-worker or a non-employee.

3. The victim does not have to be the person harassed but could be anyone affected by the offensive conduct.

4. The harasser's conduct must be unwelcome.

TSG will not condone or tolerate the sexual harassment of its employees by their co-workers, supervisors or any individual under our control. All employees, regardless of position or title, will be subject to severe discipline, up to and including discharge, should TSG determine that an employee is engaged in the sexual harassment of another individual. TSG will promptly and thoroughly investigate the facts and circumstances of any claim of sexual harassment, and will maintain confidentiality to the extent possible given the company’s duty to investigate the complaint.

**COMPLAINT PROCESS:**

1. If you feel that you are being subjected to sexual harassment OR are aware of another employee who has been subjected to sexual harassment, you should immediately report this to the Director of Human Resources. In addition, if you have questions about the complaint process or whether your own conduct is in compliance with the policy, you should immediately contact Human Resources.

- Do not delay in reporting an incident, even if you are not the victim. In the event the Director of Human Resources is not available, you may report the
incident to your immediate supervisor, who will report it to Human Resources at the earliest opportunity.

- No individual will be subject to, and it is TSG’s policy to strictly prohibit, any form of discipline or retaliation for reporting incidents of sexual harassment, pursuing any claim of sexual harassment or assisting with the investigation of a complaint.

2. Supervisors and/or any witnesses who receive the complaint should refer it immediately to the Human Resources Director.

3. The Human Resources Manager will investigate the incident.

CONFIDENTIALITY:

Matters of sexual harassment are extremely confidential and must remain confidential for all involved (to include the victim, the harasser and any witnesses). Only those with a need to know will be involved in the investigative process. Anyone who obtains information and is not involved in the investigation must contact the Human Resources Director immediately.

DISCIPLINARY ACTION:

If a TSG employee is found in violation of this policy (following a thorough investigation), he or she will be subject to disciplinary action up to and including termination of employment.

1.6 AFFIRMATIVE ACTION

TSG has established a written Affirmative Action Plan (AAP) with respect to equal employment opportunity. This AAP has been prepared in conformity with Executive Order 11246 and the implementing regulations of OFCCP, 41 C.F.R. Part 601 et seq., including Revised Order No. 4, as amended, 41 C.F.R. Part 602. This AAP is designed to provide guidance to management with respect to TSG’s commitment to full implementation of its EEO/affirmative action policy. TSG’s official policy statement, signed by its President, is included in the Plan. TSG’s policy includes without limitation, the following commitments:

- It will be the policy of TSG, in accordance with all applicable laws, to recruit, hire, train and promote persons in all job titles without regard to race, color, religion, sex, age, disability, or national origin, or any other basis prohibited by applicable law.
- All employment decisions shall be consistent with the principle of equal employment opportunity, and only valid qualifications will be required.
• All personnel actions, such as compensation, benefits, transfers, social and recreational programs, will be administered without regard to race, color, religion, sex, age, disability, or national origin, or any other basis prohibited by applicable law.

• To assure compliance with TSG's Affirmative Action Plan, TSG's Director of Human Resources has been designated to administer and monitor the plan and make reports to Senior Management. The Plan is available through the Human Resources Department for inspection in accordance with applicable regulations.

2.0 HOW WE KEEP IN TOUCH WITH YOU

The management staff is always looking for new and improved ways to keep communication channels open on a two-way basis between the employees and Supervisors of TSG. It is essential that you tell your Supervisor about your personal recommendations for improvements, as well as any problems you may be experiencing on the job.

The following summarizes the networks of communication you can use to share your ideas and concerns with us.

2.1 YOU AND YOUR SUPERVISOR

If you have any questions concerning your job or job related activities, your Supervisor usually should be the first person you talk to. However, if you do not feel comfortable discussing a particular personal matter with your Supervisor, be assured that the other methods of communication outlined in this section are also available to you.

2.2 YOUR PROBLEM-SOLVING PROCEDURE

During the performance of your duties, questions or problems may occur that affect your work. The following formal procedure has been established for your use in resolving these matters.

Step 1. Within a week of the occurrence of the problem, you may ask for a conference to discuss the matter with your immediate Supervisor.

Step 2. In the event your Supervisor does not resolve your problem to your satisfaction within a reasonable period of time, you may request a meeting with your Program Manager for further discussion.
Step 3. In the event your Program Manager does not resolve your problem to your satisfaction within a reasonable period of time, you may present your problem to your Group's Vice President for final resolution. This procedure makes it possible for you to obtain a quick review of your problem through channels up to your Group Vice President. In an emergency situation, the "step" time periods can be accelerated by mutual agreement between TSG and you.

It is recognized that some problems may be of such a personal nature or that, for some other good reason, you may prefer not to discuss the matter with your Supervisor. In such a case, you should take the problem to the Human Resources Director immediately.

This problem-solving procedure is your "direct line" to management -- please use it! If you fail to follow this procedure in a timely manner, however, it is understood that you will not contest TSG's action further. Remember that we can't help to resolve your problem if you don't tell us about it.

2.3 THE TSG NEWSLETTER

The TSG Newsletter will be published quarterly. This publication is designed to update you on TSG business activities, to advise you of upcoming events, and to give you a chance to share with your fellow employees personal news such as births, marriages and your special achievements. The Dispensary Manager is in charge of selecting items for this newsletter, so please inform him/her of any news you would like to share. Obviously, we are not able to publish all items that may be of interest to you, but we welcome your suggestions.

2.4 YOUR BENEFITS COUNSELING SESSIONS

We believe it is important to give you an opportunity to learn more about the benefits you receive from TSG in order to help you plan for your future financial security. From time to time, therefore, the Human Resources staff will be meeting with you either individually or in group sessions to discuss TSG benefits, answer your questions, and obtain your comments.

2.5 THE PRESIDENT'S OPEN DOOR POLICY

TSG has always had a policy that the office of our President & CEO is open to all employees. So, if everything else fails, and you do not get a satisfactory answer to a problem or you do not get the answer as quickly as you think you should under other communication network channels listed herein, you are free to contact his Executive Assistant for an appointment or walk in the open door of that office and address the problem directly with our President & CEO.
3.0 ABOUT YOUR JOB

3.1 EMPLOYEE CATEGORIES

Throughout this Handbook, you will see references to the following employee categories:

a) *Introductory Employees* - Those newly-hired employees who have not yet successfully completed three (3) months of service. (Reference Section 3.2).

b) *Regular Full-Time Employees* - Those employees who are regularly scheduled to work thirty-two (32) to forty (40) hours per week and have successfully completed their introductory period. They are normally eligible for the benefits provided in this Handbook.

c) *Regular Part-Time Employees* - Those employees who are regularly scheduled to work thirty-one (31) hours or less per week and have successfully completed their introductory period.

d) *Temporary Employees* - Those employees who are employed for a specific project or for a period not to exceed ninety (90) days per calendar year, and whose employment will terminate no later than completion of that project or period of time. Temporary employees are not eligible for TSG benefits.

e) *Casual/On-Call Employees* - Those employees who work on an intermittent, irregular and/or unpredictable basis. They are compensated pro rata, at an established base salary, for the number of hours that are actually worked. Casual/On-Call employees are not eligible for TSG benefits.

f) *Exempt and Non-Exempt Employees* - All employees are also classified into "exempt" and "non-exempt" categories for purposes of establishing eligibility for overtime pay under the Federal Wage and Hour Laws. Employees paid hourly are classified as "non-exempt". An employee's exempt or non-exempt status is not determined by job title alone. An employee's status may be changed only upon written notification from the immediate supervisor and/or the Human Resources Department. To determine an employee's status under the Fair Labor Standards Act (FLSA), contact the Director of Human Resources.

3.2 YOUR INTRODUCTORY PERIOD

All employees serve an introductory period at the beginning of their employment. This is a particularly important time for you and TSG, since it allows you the opportunity to evaluate whether TSG fits into your career goals, and it also provides TSG with a period
during which it can assess whether your employment appears to satisfy our present needs.

In most cases, this introductory period will last for three (3) months from your date of hire, but may be shortened or extended at the discretion of TSG. Your employment might end at your option or ours, before the end of the introductory period, or afterwards. During this period, your Supervisor may discuss your performance with you. A decision will be made, at TSG's discretion, about granting you regular employee status, extending your introductory period, or terminating the employment relationship. Your successful completion of this introductory period does not result in any change in the employment at-will relationship described elsewhere in this Handbook.

3.3 WORKING HOURS

Hours of work are determined by TSG to meet the needs of our customers. Your Supervisor will advise you of your regular work schedule, meal periods and arrangements for personal breaks.

The "work week" begins at 12:01 a.m. on Saturday and ends at 12:00 midnight the following Friday. Our "payroll week" coincides with the workweek.

The standard both exempt and non-exempt employees is 40 hours, reduced by eight hours for each Company-observed holiday. Exempt employees may, due to contractual obligations or the highly competitive nature of a solicitation, be assigned a standard workweek with greater than 40 hours.

The assignment of a work week with hours greater than those identified above does not obligate the Company to maintain such a work week for the employee nor to adjust the salary of the employee should the employee's standard workweek be lengthened.

You are expected to be at your job location (dressed in appropriate attire and ready for work) at the time your regular workday is scheduled to begin. You should record the hours worked not more than five (5) minutes after the end of your regular workday, unless you are specifically instructed to work overtime by TSG.

If you desire to leave the jobsite or premises during working hours, you must notify and receive permission from your Supervisor in advance of your departure.

TSG's pay practices, procedures and records are the basis for establishing the number of hours worked by each employee, and govern all questions pertaining to hours worked, overtime, and all other pay issues. Nothing in this Handbook is a guarantee by TSG of hours of work per day, per week, per year, or on any specific work schedule.

3.4 TIMESHEETS
It is the policy of TSG to have every employee accurately record time worked. Federal and state laws require TSG to keep an accurate record of time worked in order to calculate employee pay and benefits.

Types of time charges include:

- **Direct Charges**
  1. All time that can be identified specifically with the onsite activity of a particular dispensary or cultivation location.

- **Indirect Charges**
  1. An overhead charge is time spent on overhead activities such as administration, business development, and other specific activities such as internal TSG management reporting functions.
  2. General and Administration (G&A) is time spent on corporate general and administrative activities such as accounting, corporate financing, corporate planning, etc.

Hard-Copy Timesheets should be completed as follows:

1. Timesheets must be recorded in black or blue ink, on a daily basis.
2. No erasures, white-outs or other modifications are allowed on timesheets. Errors should be lined out (with one diagonal line) and initialed by the employee and Supervisor. An explanation of the error must be noted at the bottom of the timesheet.
3. Employees should check with their Supervisor to ensure accuracy of the charge number(s) at the start of each pay period or new assignment.
4. Timesheets must be submitted promptly to the Payroll Department at the end of each pay period.
5. Overtime work must always be approved before it is performed.
6. Timesheets must not be signed by employees until after the timesheet is fully completed.

Electronic Timesheets (ET) should be completed as follows:

1. Access the ET by using your Internet Explorer and entering https://et.TSG.com in the address box.
2. Complete your ET on a daily basis.
3. You cannot complete the ET in advance, except for leave or holiday charges.
4. A paper timesheet must be completed if you are on travel and unable to access ET. A blank timesheet is available on TSG’s INTRANET. Further, if you are on leave or travel at the end of a pay period and cannot complete and sign your timesheet, contact your supervisor, who will complete and sign it for you. When
you return, open the timesheet and sign it. Your signature will replace your supervisor’s. You supervisor should then approve it, which will replace the previous approval.

Instructions for ET will be provided to you by your immediate supervisor, Administrator, or Payroll Department.

No employee shall work or record more hours than the assigned standard work unless overtime time has been approved in advance by the Supervisor. If the contract requirements demand that the employee work hours beyond the employee’s standard work week and TSG will bill the customer for the time worked, the Supervisor will authorize the employee to work and record the additional hours and the employee will be paid for these hours in accordance with paragraph 3.5, Overtime Work. If additional hours that have not been approved are recorded on the time sheet, the Supervisor must identify these hours as unbillable and shall counsel the employee regarding working unauthorized overtime. Altering, falsifying, tampering with timesheets, or recording time on another employee’s time record is not acceptable. It is the employees’ responsibility to sign their timesheet and to certify the accuracy of all time recorded, except where noted above. Questions regarding completion of the categories (charge types) should be addressed first to an employee’s immediate Supervisor. If additional clarification is needed, contact the Payroll department. Any exceptions to this policy will require the prior approval of the Senior Vice President or President.

3.5 **OVERTIME WORK**

If you are a non-exempt employee, you will be paid one and one half-times your regular rate for all hours worked in excess of forty (40) hours in a work week. Overtime at the premium rate (1-1/2 times regular rate) is calculated based on hours actually worked in a week. Thus, an employee who works 36 hours in a week in which he/she also receives 8 hours of holiday pay or paid sick leave, will be entitled to an additional 4 hours of pay at a straight time rate, not at the premium rate. The amount of overtime work and employee(s) assigned to work such overtime hours is established by TSG and must be approved before it is performed.

Straight time rate overtime for exempt employees is permissible on a case-by-case basis and must be approved in advance. TSG may, at its discretion, compensate exempt employees for straight time rate overtime if the contract for which the employee is working, permits such compensation. In general, if the contract requirements demand that the employee work overtime beyond the employee’s standard work week and TSG will bill the customer for the time worked, the employee will be paid straight time rate for these hours. If an exempt employee is authorized to receive straight time rate overtime for a specific period, this does not obligate TSG to pay straight time rate overtime at any time in the future without further approval.
There will be no duplication or pyramiding in the computation of overtime and other premium wages. No employee will be paid more than once for the same hours worked.

3.6 PAYROLL INFORMATION

TSG’s pay dates are bi-weekly (26 per year). All employees are paid every other Friday for their work in the two previous work weeks, unless that particular Friday happens to be a holiday. In such case, you will receive your paycheck (or pay statement) on the last work day preceding the holiday. Your paychecks (or pay statement) are delivered to you at your work location or, in some cases, mailed to your home address. TSG will not release your paycheck (or pay statement) to anyone other than you, except with your written authorization.

Remember also that deductions from your paycheck for federal and/or state withholding taxes, and for social security taxes (FICA) are required by law.

You may voluntarily authorize in writing additional deductions from your paycheck for your contribution to our benefit plans, such as our 401(k) Retirement Plan and Voluntary Long Term Disability Plan, and other items permitted by TSG. You are responsible for providing Human Resources/Payroll with the correct information on benefit and tax deductions.

Direct deposit of your pay to your designated bank is accomplished by completing TSG’s Direct Deposit authorization form and submitting a voided check to the payroll department.

3.7 EMPLOYMENT OF RELATIVES

Qualified relatives of TSG employees are eligible for employment; however, their employment assignments will be regulated for reasons of supervision, security, safety, and morale, in accordance with applicable state, federal and local laws and regulations. It is the policy of TSG not to employ relatives in the same department if one employee will be under the direct supervision of the other or, in TSG’s judgment, may cause serious conflicts and problems with employee morale.

Relatives of persons currently employed by TSG may be hired only if they will not be working directly for or supervising a relative or will not occupy a position in the same line of review within the organization. This policy applies to any relative, higher or lower in the organization, who has the authority to review employment decisions. TSG employees cannot be transferred into such a reporting relationship.

Relatives are defined as spouses, parents, children, grandparents, grandchildren, brothers, sisters, aunts, uncles, nieces, nephews, in-laws, cousins, significant others, wards, guardians or any of these in a step relationship.
A Supervisor relationship is a relationship where one has the authority to make, approve, or recommend personnel decisions affecting the other. (Relatives, as defined above, may not be employed in positions where there is a direct supervisor relationship).

If the relative relationship is established after employment, TSG, in consultation with the individuals concerned, will decide who will be transferred.

3.8 MEDICAL EXAMINATIONS

TSG reserves the right, for the health, safety, productivity and security of persons, property and facilities, when job related and necessary in our judgment, to require applicants for employment and employees to consent in writing and submit to medical or physical examinations by a physician designated by or approved by TSG, at TSG's expense, to the extent permitted by applicable law.

3.9 SECURITY CHECKS

In order to ensure that contraband, drugs, weapons and other unauthorized or illegal substances or materials, or substances or materials to be used for illegal purposes, do not enter our work locations, TSG premises and other facilities, and to further ensure that tools, files, equipment, products, materials, substances and other property of TSG are not being removed from our work locations, premises and other facilities without our authorization, TSG reserves the right, in our discretion, to question, inspect, and search any employee or other person before they enter or leave any of these facilities.

When consistent with state law, this policy also applies to any employee while on TSG business, whether or not on our job sites, premises and other facilities, along with any packages or other items that the employee may be carrying. All vehicles, lockers, containers, briefcases, handbags, and other parcels and personal belongings thus are subject to inspection and search by TSG or its designated outside investigators at any time.

These procedures are necessary for the safety, health and security of everyone at TSG and the protection of our property and facilities. Submission to and compliance with these rules is a condition of your continued employment.

3.10 FIRE PROCEDURE

In case of fire at TSG Headquarters, you should follow procedures as set forth by the building's management office. Thereafter, follow the directions of your Supervisor, Facility Security Officer, or the public address broadcast for evacuation of the premises.
when necessary. TSG employees at other dispensary and/or cultivation facility locations should follow the fire alarm and evacuation training procedures at those locations.

Our first consideration is the safety of employees and visitors. Then, attention will be given to fighting the fire and protecting the property of TSG.

3.11  **EMPLOYEE IDENTIFICATION BADGES**

At all locations, you will be issued an identification badge upon your employment with TSG. You must use this badge which contains your photograph, name, date of birth, social security number, employee number and usual work location (badge information will vary according to work location), to gain access to the designated employee entrance areas at some TSG work locations and other facilities.

Although you will keep the badge while you work here, it remains TSG property and is returnable to the Company, as is all other TSG property that you are issued. Upon termination of your employment, the badge will be submitted to your immediate Supervisor. Lost or stolen badges must be reported to your Supervisor and the Facility Security Officer immediately.

3.12  **EQUIPMENT BREAKDOWNS**

Any TSG-owned equipment or machinery that is not operating properly or is due for a maintenance check-up should be reported immediately to your Supervisor.
3.13  **HAZARDOUS WEATHER PLAN/EMERGENCY CLOSINGS**

It is the policy of TSG to acknowledge hazardous or emergency conditions at each facility and make decisions to close those facilities whenever necessary. However, employees working on customer sites will abide by the customer’s decision regarding bad weather and emergency closings.

Natural or human emergencies such as severe weather, fires, power failures, bomb threats or earthquakes can disrupt company operations. In extreme cases, these emergencies may require the closing of a work facility.

When the decision to close is made after the workday has begun, all employees who reported for work will be paid for the full day.

If the company is open for business and an employee feels that he or she cannot report to work safely due to hazardous weather conditions, he or she will be expected to use earned vacation or leave without pay. However, if an employee consults with their immediate Supervisor (in advance) and arrangements are made to work from home, he or she will not be required to use their leave. In either event, the Supervisor should be notified as early as possible when an employee feels he or she cannot report safely to work.

3.14  **EMPLOYEE LOUNGE**

In order to provide you with a comfortable area where you may have your meals, we maintain an employee lounge at all sites for the convenience of TSG personnel.

3.15  **PERSONAL PROPERTY**

TSG does not accept responsibility for your personal property. We urge all employees to take the necessary safeguards to protect their valuables on the worksite and leave unnecessary valuables at home.

3.16  **TRADE SECRETS AND INVENTIONS**

Invention and creativity enhance the ability of TSG to serve its clients and customers. During the course of his/her employment, employees may work on and become part of the development of technical or other systems for TSG. Employees’ inventions and creations and their developed information which are related to TSG's business must be transferred to TSG for its continued use. All such inventions and creations shall be, and will remain, the sole and absolute property of TSG. Employees may enter into agreement with TSG for the mutual sharing of royalties derived from inventions.
Employees must maintain the confidentiality of all trade secrets and proprietary information of TSG. Such information includes, but is not limited to, any information about TSG's inventions, discoveries, research and development data or know-how, and also any information about TSG's customers, employees, suppliers, contractors, clients, business relationships, contracts, finances, stockholders, transactions, personnel records, marketing data or contacts, and correspondence.

The unauthorized disclosure or unauthorized use by an employee of TSG's confidential information, whether during his/her employment with TSG or after its termination, is strictly prohibited.

3.17 FORMS I-9s

Federal law requires that we have properly completed I-9 forms (within 3 days of hire date) on file for every employee hired after November 6, 1986. Federal law also requires that we reverify the continued work eligibility of employees who have only a time-limited work authorization on or before the date their employment eligibility expires. The same documentation rules apply to reverification efforts as to original I-9 compliance.

3.18 TELEWORKING – Office/Executive/Administrative Employees Only

Program Description:
Teleworking is a mutually agreed upon work alternative between the teleworker and supervisor subject to final approval of the employee’s immediate supervisor and Group Vice-President/Corporate Senior Executives. Teleworking is a voluntary work alternative that may be appropriate for some employees and some jobs, as determined by TSG. It is not an entitlement; it is not a company-wide benefit; and it does not change the terms and conditions of the teleworker’s employment with TSG Corporation. TSG will actively support teleworking where it is reasonable and practical to do so and where operational needs will not be adversely affected. The teleworker, supervisor, and Group Vice-President may end the teleworking arrangement at any time.

Teleworkers work at home one or more days a week on a regular basis. Writing, reading, telephoning, data analysis, computer programming, word processing and data entry are all tasks amenable to telework.

Eligibility:
All regular full-time exempt employees who work at the corporate office location (usually Executive/Administrative roles) are eligible to apply to become a teleworker. Their work must be of a nature such that the need for face-to-face interaction with their supervisor, co-workers or TSG clients, vendors or customers is minimal or may be scheduled to permit teleworking. The need for specialized material or equipment must either be minimal or flexible.
At a minimum, teleworkers will meet the following personal characteristics:

1. Knowledgeable about their job.
2. Have a low need for social interaction.
3. Dependable and trustworthy.
4. Organized
5. Possess a demonstrated conscientiousness about work time and productivity evidenced by satisfactory or better performance reviews.
7. Ability to work well alone for long stretches of time.
8. Limited need for feedback but able to ask when necessary.
9. Have good communication skills.

Requirements Necessary to Qualify for the Teleworking Program:

1. Regular full-time exempt employees (as described above) who are past their 3 month introductory period.
2. Employee will submit a written proposal to his/her immediate supervisor which outlines the following:
   a. Why he/she would be an ideal candidate for telework,
   b. Days of the week and hours he/she plans to telework,
   c. Environment where he/she will be working (e.g. den, living room, home office, etc.) and
   d. Type of equipment he/she has at home in order to perform the job. Each proposal will be reviewed on a case-by-case basis. Submission of a proposal does not guarantee approval of a teleworking arrangement.
3. Employee's willingness to sign and abide by a telework agreement.
4. Supervisor/Program Manager/Group Vice-President’s approval
5. Supervisor's willingness to invest the necessary time to help the telework arrangement succeed.
6. Planning with co-workers how workflow issues will be addressed while teleworking (e.g. mail received at the location other than the telework location, transfer of phone calls/messages, meetings, etc).

Childcare:
If childcare is necessary, the teleworker must make or maintain childcare arrangements to permit concentration on work assignments at home during scheduled work hours. You may be required to provide proof of your childcare arrangement.

Hours of Work/Timesheet Reporting:
The teleworker will have regularly scheduled work hours agreed upon with his or her supervisor, including specific core hours of phone and email accessibility. The teleworker will record and submit work hours daily by accessing Deltek’s Electronic Timesheet (ET) or using hard-copy timesheets that are provided by TSG.
Employee/Supervisor Communication:
Teleworkers must be available by e-mail or telephone/cell phone during their scheduled work hours. If the teleworker leaves his/her worksite during scheduled work hours, he/she must notify the supervisor in advance or as soon as possible in the event of an emergency.

The teleworker will keep their supervisor informed of progress on assignments worked on at home, including any problems which they may experience while teleworking.

Methods of planning and monitoring the work of the teleworker may include the following:
1. E-mail to supervisor outlining a weekly work plan.
2. Scheduled telephone meetings with the supervisor on a regular basis.
3. Make arrangements for the teleworker to attend scheduled staff meetings, when necessary. In some cases, teleconference may be appropriate.
4. Provide monthly reports to your immediate supervisor followed by a list of accomplishments.

Equipment:

Hardware:
TSG will attempt to provide PC equipment on an as-needed basis. This equipment may consist of a PC, modem and supplies.

The employee may, with their supervisor's approval, elect to use PC equipment of their own. If this option is chosen, TSG may require the employee to bring their PC to TSG’s Corporate office for evaluation, configuration, and software loading. A minimum configuration standard will be established by TSG as a condition of support of employee PC equipment. No office furniture will be provided.

Software:
While working at home performing TSG functions, employees must conform to software standards as established by TSG. Under most circumstances employees will be allowed to run a copy of standard office software on the PC they have at home base on the specific Licensing Agreement. Please contact the Information Technology Department to ensure the software you plan to use conforms to this agreement.

Equipment Liability:
TSG will be responsible for the repair and maintenance of equipment provided by TSG. Surge protectors must be used with any TSG computer made available to the teleworker.

The employee will be responsible for the following:

1. Any intentional damage to the equipment.
2. Damage resulting from gross negligence by the employee or any member of the employee's family.
3. Damage resulting from a power surge if no surge protector is used.
4. Teleworker should check their homeowner's/renter's insurance policy for incidental office coverage.

Damage or theft of TSG equipment that occurs outside the employee's control will be covered by the TSG insurance policy. TSG is not responsible for damage or loss to employee-owned equipment.

**Work Space:**
The employee must establish and maintain a clean, safe, dedicated workspace. TSG reserves the right to inspect the teleworker’s work environment at a mutually agreed upon time.

**Injuries:**
The employee will be covered by worker's compensation for all job related injuries that occur in the designated work space at the teleworker's home during the teleworker's defined work period. Since the workplace and home will be one and the same, worker's compensation will NOT apply to non-job related injuries that might occur in the home. Home office sites will be reported to TSG's insurance carrier.

**Expenses:**
Except for local calls, TSG will reimburse the employee on a case-by-case basis for job related telephone expenses incurred by the employee at home. Other expenses that are reimbursed to the employee may include Internet usage, office/computer supplies, fax line and if needed, long distance. The employee may be added to the Qwest (long distance service) account. The employee must present an itemized copy of the telephone bill to the Accounting department for reimbursement.

### 4.0 YOUR EMPLOYEE BENEFITS

In addition to the regular pay check you receive for working at TSG, we offer numerous benefits, services, and conveniences to help provide protection and assistance for you and your family. The value you receive from these benefits and services is really a "hidden paycheck" provided by TSG.

Our insurance, retirement plan and other plan benefits are discussed in more detail in separate plan booklets, and in the formal contracts and other plan documents. In the event there is any question or conflict in language or interpretation between those booklets and documents in relation to the provisions of this Handbook, the terms of the actual contracts and other plan documents will have control over the summaries in this Handbook. It is further understood that nothing in any of the benefits plans summarized in this Section will be considered a waiver of the TSG's Standards of Attendance as stated in Section 7 of this Handbook.
Here are some of the highlights of TSG's employee benefits program, and a number of other services and conveniences TSG offers you in recognition of your value to TSG:

4.1  GROUP MEDICAL INSURANCE

All regular full-time employees are eligible for TSG's Health Plan. **Coverage becomes effective the first of month following or coincident with your start date.** Reference your Summary Plan Document for details.

4.2  SHORT-TERM AND LONG-TERM DISABILITY INSURANCE

All regular full-time employees are eligible for disability benefits due to sickness or non job-related accidents. Premiums for the Short-Term Disability (STD) Insurance Plan are fully paid by TSG. TSG makes Long-Term Disability (LTD) insurance available to employees for purchase on an individual basis through its disability insurer. Weekly benefits start immediately for any non job-related injury. If you are off from work due to sickness (or maternity leave), there is a seven (7) continuous day waiting period with benefits payable on the 8th day.

For claims due to sickness, you should seek medical attention immediately! This determines your date of disability and your 7-day elimination period will follow your date of disability. For claims due to maternity, please refer to your claim form or plan booklet. Benefits will begin on the first day of an accident. Weekly benefits start immediately following the waiting period for sickness/maternity leave. The maximum benefit period for STD is 66-2/3% of your salary for up to thirteen (13) weeks. After this 13-week period of continuous disability, the LTD plan becomes effective (if it has been purchased by the employee). This Plan is integrated with Family & Medical Leave (FMLA) Social Security and Workers' Compensation benefits. Refer to your Summary Plan Booklet (located on the INTRANET) for details.

4.3  LIFE INSURANCE (COMPANY PAID)

All regular full-time employees are eligible for TSG's Life Insurance Plan. Life Insurance is valued at two times your current salary (to a maximum of $250,000). Premiums for this insurance are fully paid by TSG.

However, premiums paid for policies in excess of $50,000 (Reference the EXLI information located on the INTRANET) will be calculated as taxable income and subject to federal income tax. This tax will be calculated and then deducted bi-weekly from your pay to fulfill all tax requirements.
4.4 CONTINUATION AND CONVERSION OF HEALTH INSURANCE BENEFITS (COBRA)

The Consolidated Omnibus Budget Reconciliation Act (COBRA) requires continuation of group health coverage for certain employees and their dependents who would otherwise lose coverage under the plan.

**Your group health coverage with TSG will terminate at midnight on The last day of the month in which your employment terminates or the last day of the month in which you experience a reduction of hours of employment.** In accordance with applicable law, if your employment terminates, or if you experience a reduction in hours of employment, you may be eligible to either continue your present level of health insurance coverage under TSG's Group Health Insurance Plan, at your own cost, for a minimum period of eighteen (18) months, or you may be able to convert your group coverage to individual coverage.

If your spouse and any dependent children are covered under TSG's Group Health Plan at the time of your termination or reduction of hours, they may also have the same right to continue their health insurance coverage. In addition, they may have the right to elect to remain covered under our Plan if they lose coverage because of: (a) your death; (b) your divorce or legal separation; (c) your entitlement to Medicare; or (d) a dependent child's ceasing to be a "dependent child" under the plan. However, if events (b) or (d) above occur, you or your spouse must notify us of the event within 60 days in order for your spouse or child to be eligible to continue coverage.

To be eligible for these continuation or conversion rights for yourself or your spouse and any dependent children, the law requires that certain conditions be met. In addition, the Plan Booklets you receive contain further details concerning your health insurance coverage and the extension of such benefit coverage that governs in the event of any conflict. Of course, because the law changes and because our health insurance benefits change periodically, the continuation and conversion of benefits described above may also change. Information regarding your COBRA rights and premium information will be mailed to your home address following your date of termination or date of reduction of hours.

4.5 401(k) RETIREMENT PLAN

All regular full-time employees and part-time employees who complete 1,000 hours of service are eligible for participation in TSG's 401(k) retirement plan. A 401(k) plan allows you to reduce your compensation by payroll deduction and have these deferrals contributed to the plan on your behalf. This tax-deferred arrangement allows you to contribute up to the current IRS deferral limit amount. Detailed information regarding catch-up contributions that began in 2002 will be provided in the Annual Plan Synopsis and Summary Plan Description. Deferrals are calculated on total
wages to include overtime (excludes bonuses). Entry dates for the 401(k) plan are quarterly: January 1, April 1, July 1 and October 1 of each year.

You may increase or decrease your contributions (or deferrals) once per quarter. You may cancel your contributions at any time during the year; however, when you do this, you may not contribute to the plan again until the next entry date.

Each plan year, TSG may elect to make a matching contribution. Information regarding plan-matching contributions can be found in your 401(k) Summary Plan Description.

Plus, your current federal taxable income is reduced by whatever you save and no federal income tax is paid on your contributions, TSG contributions, or on interest earned, until you actually withdraw the money. For more information, see your Summary Plan Description.

4.6 WORKERS’ COMPENSATION

If you are injured on the job, you may be eligible to receive insurance benefits as provided under the State Workers’ Compensation Act. TSG pays all costs of providing this insurance protection. It is important that you report immediately any accident or injury that occurs on the job or that you believe is job-related, to your Supervisor or Human Resources Manager. In most cases, you will need to complete a first report of injury within 24-48 hours of the incident's occurrence. Workers' Compensation policies vary according to the state in which you are employed.

4.7 UNEMPLOYMENT COMPENSATION

TSG contributes under the State Unemployment Compensation Act to insurance funds that may provide you with income in the event you are laid off or become unemployed through no fault of your own. As an employee, you pay no part of the fund that provides you with this benefit. The entire cost for this protection is paid by TSG.

4.8 SOCIAL SECURITY

Social Security is a benefit to all employees with responsibility of contributions shared equally by TSG and you as an employee. Your share is deducted from your wages each pay period. TSG makes an equal contribution and sends the total (employer and employee) payment to the District Director of Internal Revenue Service. Social Security payments made by TSG are not subject to Federal or State Income Tax by the employee.
4.9  **EMPLOYEE RECREATIONAL ACTIVITIES**

A variety of voluntary recreational, social, and athletic functions are supported by TSG from time to time, at its discretion, for the benefit of our employees. Significant financial support for these programs is supplied by TSG, and they are administered through our Human Resources Department or offsite. You should know, however, that TSG is not responsible for injuries or accidents resulting from your participation in any of these voluntary activities.

4.10  **PRESIDENT’S AWARDS**

All TSG employees are eligible to receive Presidential Awards. These awards are special recognitions issued by TSG’s President for outstanding performance or for ideas that save time, money or materials, that improve service or quality, or make jobs more efficient, easier, or safer. Request(s) from an employee’s supervisor/team leader, manager or group vice president should be submitted to the President. To do this, you must complete the Employee Recognition Award Request Form.

4.11  **BONUS BENEFITS**

It is the policy of TSG Corporation to acknowledge and reward exceptional performance and outstanding contributions to TSG Corporation employees. This policy defines the types of bonuses and the procedures for their Administration.

**APPLICABILITY/ELIGIBILITY:**

All Regular full-time employees who have been employed with TSG for one (1) full year unless authorized by the President or Chief Financial Officer.

**DEFINITION:**

Performance - A majority of TSG employees are expected to perform at a high enough level to merit a performance bonus, typically issued during the last quarter of TSG’s fiscal year.

Discretionary - Under extraordinary circumstances, the President, upon the recommendation of the Chief Financial officer or Group Vice Presidents may authorize the distribution of a bonus at any time during the fiscal year. Such a bonus will be made when an outstanding performance is considered to merit immediate reward.

**GENERAL:**

To be eligible for the performance bonus, the employee must exceed minimum performance level expectations (goals). These are established annually by the
employee and supervisor in unification with corporate goals and approved by the Group Vice Presidents, Chief Financial Officer and President. These goals and expectations will be in such areas as technical performance on individual projects, customer service, customer relations, quality of work, administrative achievements, and cost control.

Discretionary Bonus - Examples of achievements, which may merit a discretionary bonus, are:

- **Marketing or Sales Achievements Above Those Normally Expected of an employee in a given position.** This bonus is to reward marketing or sales accomplishments clearly above what is expected.

- **Technical Development.** This criterion rewards those employees for their technical contributions. Those technical development contributions must be significant and useful to TSG.

- **Outstanding Single Accomplishments.** This category includes those extraordinary achievements that are significant on their own merit to help TSG progress toward attainment of its goals and objectives.

Although permitted under special circumstances, as a rule, bonuses are not awarded in lieu of a fair and equitable salary.

**GUIDELINES:**

At the beginning of each year, a bonus pool will be projected for each Operating Group at an amount established by the Group Vice Presidents and Senior Executive Officers. The final amount of each bonus pool will be determined at the end of the fiscal year. At that time, TSG Executives will determine the final bonus dollars available based upon the overall profitability and performance of each Group as compared to fiscal year targets.

Once the amount of bonus money for each bonus pool is determined actual dollar amounts to be distributed to employees in each group shall be recommended by the Group Vice Presidents and approved by TSG’S Executive Officers.

**DISTRIBUTION:**

Performance Bonuses: These bonuses will be disbursed within 120 days after the end of the fiscal year. Employees designated to receive these bonuses must be employed at TSG on the bonus distribution date.

Discretionary Bonuses: This bonus may be the only bonus that an employee will receive for that fiscal year. Discretionary bonuses are paid immediately rather than within 120 days after the end of the fiscal year. Requests for discretionary bonuses must be received in writing from the Group Vice Presidents to the Senior Vice President. The
memo from the Group Vice President must cite in sufficient detail the exact reason for
and identify the criteria under which the request is made. The total of all discretionary
bonuses shall not exceed 15% of the projected divisional bonus pool.

EXCEPTIONS:

Any exceptions to this policy will require the prior approval of the President or Sr. Vice
President.

4.12 SENIORITY

Seniority for all employees will begin from the first day your actually start work for TSG.
In the event of a layoff, the employee will retain his/her seniority for a period of one year
from the effective date of the layoff but does not continue to accrue seniority during the
leave of absence.

In the event of mergers, acquisitions or new contracts involving transfer of incumbent
employees, TSG may honor your date of hire and length of service on a case-by-case
basis for the purpose of any benefit plans that will be affected by your seniority with your
previous employer.

Seniority is lost under any of the following conditions:

1. Voluntary termination
2. Involuntary termination (except in the event of layoffs as mentioned above)
3. Retirement
4. Following 12 months of separation for favorable and voluntary termination

5.0 TIME OFF FROM WORK

We hope that the provisions in this Section of our Handbook will provide periods of rest
and recreation for you and your family.

5.1 PAID LEAVE

All regular full-time employees are eligible for TSG’s paid leave plan.
We encourage you to make full use of all of the paid leave to which you are entitled
each year.

Regular full-time employees will accrue 20 days of paid leave per year for the first 5
years. It is solely the employee's discretion to use his or her paid leave as either leave
or sick leave. We request that you exhaust your paid leave prior to using any type of unpaid leave (as mentioned in Section 5.5).

Paid leave is accrued at the rate of 6.15 hours per pay period. The following paid leave eligibility applies for leave earning:

- One to five years - 6.15 hours per pay period (20 days).
- After five years - one additional day per year for each year of service up to a maximum of twenty-five days of paid leave time. (Example: 21 days = 6.46 accrual rate).

Paid leave is earned beginning with the first day of employment and is accrued every pay period at a rate commensurate with the above schedule. A maximum of thirty days or 240 hours may be carried over each year.

Employees with a break in service for more than one (1) year will accrue paid leave at the rate of a new employee.

Your paid leave must be scheduled and approved in advance by your Supervisor. Approval of paid leave at a particular time may be denied by TSG due to business needs. Where operational efficiency precludes allowing two (2) or more employees to take paid leave at the same time, the Supervisor will determine the schedule, giving preference to the most senior qualified employees (in length of TSG service) who can be spared, in the Supervisor's judgment.

An employee may borrow against his or her paid leave as follows:

- With approval from your Supervisor, an employee may borrow a total of up to 24 hours.
- Additional leave beyond 24 hours will require the approval of a Group Vice President or Corporate Office Executive.

Holidays observed during an employee's paid leave should be charged to the holiday. Paid leave will not accrue when you are on an unpaid leave of absence.

Upon termination of employment, an employee will be paid for all accrued unused paid leave at the employee’s current base rate of pay in accordance with this policy. Negative paid leave balances will have the cash value of the borrowed time, and for non-exempt employees will be withheld from the employee's final paycheck. No payment will be made in lieu of paid leave not taken except to terminating employees as described above.

Holidays observed during the employee's paid leave are charged to the holiday.
5.2 **PAID HOLIDAYS - Office/Executive/Administrative**

It is the policy of TSG to observe ten (10) paid holidays each calendar year. All regular full-time employees are eligible for eight (8) hours of holiday pay at their regular base pay for the following holidays:

- New Year's Day;
- Martin Luther King, Jr.'s Birthday (third Monday in January);
- Presidents' Day (third Monday in February);
- Memorial Day (last Monday in May);
- Independence Day (July 4);
- Labor Day (first Monday in September);
- Columbus Day (second Monday in October);
- Veteran's Day (November 11);
- Thanksgiving Day (fourth Thursday in November); and
- Christmas Day (December 25)

Employees must be in *pay status on the workday immediately preceding and following the scheduled holiday. Substitutions in the TSG holidays listed above may be made by the Director of Human Resources, President or CFO.

Unless notice to the contrary is given, when the holiday falls on a Sunday, Monday will be the paid holiday. When the holiday falls on a Saturday, Friday will be the paid holiday. If a recognized holiday falls during an eligible employee's paid absence (such as paid leave or sick leave), holiday pay will be provided instead of the paid time off benefit that would otherwise have applied.

*Pay status - An employee who worked all scheduled hours, or who received holiday or leave pay for all scheduled hours, an employee who was on an authorized leave of absence with pay for all scheduled hours, or an employee who used a combination of these for all scheduled hours.

**FLOATING HOLIDAYS:**

A national holiday which is not recognized as a holiday in some states or would be a normal workday at some sites. These holidays are identified as follows:

- Martin Luther King, Jr.'s Birthday
- President's Day
- Columbus Day and Veteran's Day

**DEFERRED HOLIDAYS:**

In situations where a TSG employee must work on a scheduled holiday, that holiday will be "deferred". If the employee works less than 8 hours on the scheduled holiday, the remaining hours of the holiday needed to total 8 hours will be deferred. Any deferred holiday hours will be taken at a later date that is pre-approved by the employee's immediate supervisor. The deferred holiday must be taken before the end of the year.
For timesheet purposes, the employee should enter the hours worked (plus any holiday hours needed to total 8 hours for the scheduled holiday). The employee should include a comment on his/her timesheet that he/she worked on the scheduled holiday. When the employee takes the deferred holiday hours at a later date, he/she should charge the hours to holiday on the timesheet and include a comment that these holiday hours represent the scheduled holiday on which the employee actually worked.

5.3 BEREAVEMENT LEAVE - Office/Executive/Administrative

All regular full-time employees are eligible for TSG’s bereavement leave benefit. Upon your first day of employment, you become eligible for a leave of absence with pay at your regular rate for a maximum of three (3) regularly scheduled work days lost due to a death in your immediate family. "Immediate family" is defined as the employee's spouse, parents, foster parents, legal guardians, grandparents, children, grandchildren, brother, sister, in-laws or "step" relatives of the same degree. Employees may, with their Supervisor's approval, use any available paid leave for additional time off for bereavement as necessary.

Employees should notify their Supervisor immediately of the need to take bereavement leave. The appropriate hours should be noted in the proper space on the employee's time sheet to document bereavement leave.

5.4 JURY DUTY - Office/Executive/Administrative

It is the policy of TSG to encourage employees to fulfill their civic responsibilities by serving jury duty when called upon. Time off for jury duty is granted to all employees, in accordance with applicable law. When you receive a notice to report for jury duty, notify your Supervisor immediately. This will allow your Supervisor adequate time to make arrangements for coverage during jury duty absence. You must provide your Supervisor with a copy of the subpoena, jury certificate, or court order before leave is granted, and again upon your return to work. You must also furnish receipts or other records provided by the court showing the amount received as juror's fees, travel expenses, or any other compensation provided by the court.

If you are not required to serve as a juror on a regularly scheduled workday, please contact your Supervisor as soon as possible to determine if you are needed by TSG to work that day.

Employees may request up to 2 weeks of paid administrative leave at their base pay rate over any one-year period. Jury duty pay will be based on the employee's base pay rate times the number of hours the employee would otherwise have worked on the day of the absence. Employees will receive the difference between their gross salary from TSG and the gross pay received from jury duty attendance. No overtime or holiday
wages will be paid. In no event will the employee be entitled to jury duty pay under this policy for more than 80 hours within any year unless so required by law. If employees are required to serve jury duty beyond the period of paid administrative leave, they may use any available paid time off (for example, leave benefits) or may request an unpaid administrative leave of absence.

Jury duty pay statements (not the actual check) should be forwarded to the Payroll department for differential pay processing. If the pay received is more than the employee's normal rate of pay, then no differential is paid. The employee does not have to pay TSG the excess.

TSG will continue to provide health insurance benefits for the full term of the jury duty absence. However, benefit accruals such as leave, sick or holiday benefits, will be suspended during unpaid jury duty leave and resume upon return to active employment.

5.5 UNPAID LEAVE OF ABSENCE - Office/Executive/Administrative

On occasion, you may need to take extended time off from work for personal reasons. Depending upon the circumstances, including but not limited to our business needs, your overall job performance, length of service (seniority), and the reason for needing the time off, leave without pay and unpaid leaves of absence for limited periods may be granted, at TSG's discretion.

Unpaid Leave of Absence (LOA)
An unpaid leave of absence may be granted, in TSG's discretion, when a full-time employee is required to be off from work for a period up to ninety (90) consecutive calendar days. If you desire such a leave of absence, you must present a written request to your Supervisor who will forward it to our Human Resources Director for further consideration. To permit advance planning, any request for a leave of absence must be submitted at the earliest time you have reason to believe you will have a future need for such leave. The written request must set forth the anticipated length of the absence, with the date of the requested leave and the circumstances that prompted the request. An approved leave of absence will not be extended beyond the date of the initial written request without further written request and approval.

Leaves of absence may be granted in two situations:

- **Medical Leave of Absence** - may be granted when a licensed physician certifies that the employee is absent from work due to a medical condition which requires hospitalization or confinement under a physician's care or where the employee's condition presents a danger to the employee or to others. An employee granted a medical leave of absence will not receive company fringe benefits but may continue to participate in TSG's health insurance plans provided the employee pays the spouse and/or dependent cost of the premiums. Coverage under the insurance plans is provided subject to the limitations of the policies. An
employee who has not met the eligibility requirements for FMLA leave is an example of someone who might request a medical leave of absence.

- **Personal Leave of Absence** - may be granted to an employee when requested by the employee for reasons such as personal hardship, family illness, educational sabbatical, or public service. An employee granted a personal leave of absence will not receive company fringe benefits but may continue to participate in TSG's health insurance plans provided the employee pays the entire cost of the premiums. Coverage under the insurance plans is provided subject to the limitations of the policies.

Unless on disability leave, you will be required to utilize the paid leave time which you have available to cover all or a portion of your absence in accordance with applicable policy, and you will receive full pay until your available paid leave is exhausted. Time in LOA status will not be considered for calculation when determining employee performance review dates.

Being granted a leave of absence does not assure you the right to return to work for TSG or to return to the job you held before you left. It simply means TSG will make an effort, but is not obligated, to place you in a job upon your return. You will not accrue any length of service (seniority) credit while you are on leave. If you fail to accept an offer of reinstatement to a position offered by TSG at the end of such leave of absence, you will be deemed to have voluntarily resigned.

This policy does not apply to leaves of absence covered by the Family and Medical Leave Act. FMLA leave is covered by a separate policy in Section 5.6.

### 5.6 FAMILY AND MEDICAL LEAVE (FMLA)

It is the policy of TSG to grant periods of unpaid leave to employees who request time off for family or medical reasons, in accordance with the Family and Medical Leave Act of 1993 ("FMLA"). The eligibility criteria and general guidelines used in administering this policy are set forth below.

#### Covered Employees

To be eligible for leave under the FMLA, you must have been employed by TSG for at least twelve months, whether consecutive or intermittent, and worked at least 1,250 hours during the twelve-month period preceding the leave. The term "covered employees" does not include an employee that is employed at a worksite which employs less than 50 employees if the total number of employees within 75 miles of that worksite is less than 50.

#### Reasons for Leave
You may request leave under the FMLA for the following reasons: (1) birth of a child; (2) placement of a child with you for adoption or foster care; (3) a serious health condition affecting your spouse, child or parent or (4) a serious health condition that makes you unable to perform at least one of the essential functions of your job. For purposes of this policy, a serious health condition is an illness, injury, impairment or physical or mental condition that involves inpatient care in a hospital, hospice or residential medical care facility, or continuing treatment by a health care provider.

**Length of Leave**
Leave under the FMLA is limited to a total of twelve (12) work weeks during a twelve-month period. In determining the amount of FMLA available to you, we will consider the twelve-month period preceding the date the leave is to be used. Leave taken to care for a sick family member or because of your own serious health condition may be taken intermittently or on a reduced work schedule when medically necessary and supported by certification from your doctor or other health care professional. In such a situation, however, you may be transferred temporarily to a position which, at the discretion of the firm, better accommodates the leave schedule, but is equivalent in pay and benefits to the position held prior to the leave. FMLA leave taken for the birth of a child, or for the placement of a child for adoption or foster care, must be taken as a single block of time, unless otherwise agreed to by the firm, and eligibility for such leave ends twelve months after the date of birth or placement.

**Pay Status During Leave**
Your pay status during a period of leave under the FMLA will depend on the reason for the leave, the length of the leave, and the amount of available (by, earned but unused) paid leave time as of the beginning of the leave. You will be required to utilize the paid leave time which you have available to cover all or a portion of your absence in accordance with applicable policy, and you will receive full pay until your available paid leave is exhausted. If appropriate, you may be paid short-term disability benefits during the leave. Once your paid leave benefits are exhausted, you will be in unpaid status during the remainder of the leave. Paid leave time will not accrue during any period for which you are receiving short-term disability benefits or are in unpaid status.

**Notice Required**
If the need for leave is foreseeable, you must notify your Supervisor and the Human Resources Director, at least thirty days prior to the date the leave is to begin. If the need is not foreseeable, you should provide as much notice as practicable. The request for leave should be made by completing TSG's "Request for FMLA Leave" Form. On this form, you can denote your reason for the leave and amount of time required. If the leave is needed because of a serious health condition, whether yours or that of a family member, you will be required to provide a health care provider's certification to Human Resources on the appropriate TSG form to support the need for the leave. In the case of leave taken because of your own serious condition, certification (fitness-for-duty certificate) of your ability to return to work may also be required.

**Effect on Benefits and Employment**
Coverage under TSG’s group health plan will continue at no additional expense to you during any period that you are on leave under the FMLA. You will, however, be required to continue paying your portion of the premium for your own and any dependent coverage, as well as any contributions to the Flexible Spending Accounts, should you wish to keep such coverage in effect. Coverage under TSG’s life and long-term disability policies will be continued in accordance with the provisions set forth in our general Leave of Absence policy. Should you fail to return to work after the expiration of your leave, you may, depending on the circumstances, be required to refund to TSG any health insurance premiums paid on your behalf during the leave.

Upon return to work from leave under the FMLA, you will be placed in the position you held prior to the leave or in one which, in TSG’s judgment, is equivalent in pay, benefits and other conditions and terms of employment to that held prior to the leave. If you are considered a key employee (among the highest-paid 10% of all the employees employed by TSG within 75 miles of the employee's work location) under the FMLA, however, we are unable to guarantee reinstatement on the grounds that such reinstatement may cause substantial and grievous economic injury to TSG’s operations.

The provisions set forth above are a brief summary of the entitlements and requirements under the FMLA. It is our intention to administer the policy in a manner consistent with regulations issued by the Secretary of Labor. Questions regarding the FMLA should be directed to your Supervisor or the Human Resources Director.

5.7 MILITARY LEAVE - Office/Executive/Administrative

It is the policy of TSG to support employees who are U.S. Military reservists and are required to spend two weeks per year on active duty. In addition, TSG supports those reservists who are required to report for longer (or special) assignments.

Military documents (copy of orders) must be provided to the employee's immediate Supervisor for verification of active military duty.

Employees may receive up to two (2) weeks of reserve duty pay over any one (1) year period. Before leaving for reserve duty, employees must forward to Accounting documents from the military showing the amount of pay they will receive from the military. For the two-week reserve duty pay period, these amounts will be deducted from their regularly scheduled paycheck so that the employee's military pay plus TSG pay will amount to the employee's regular TSG pay.

Health insurance benefits will be provided by TSG until the end of the first full month after military leave begins. At that time, employees will become responsible for the full costs of these benefits if they wish coverage to continue. When the employee returns from military leave, benefits will again be provided by TSG according to the applicable plans.
Benefit accruals, such as leave, sick leave, or holiday pay will resume for the normal two-week military assignment. However, benefits will be suspended when an employee is required to spend more than two weeks on active military duty. In the event that benefit accruals and holiday pay are suspended, they will resume upon the employee’s return to active employment.

Employees on two-week active duty training assignments or inactive duty training drills are required to return to work after the end of training, allowing reasonable travel time. Employees on longer military leave must apply for reinstatement in accordance with all applicable state and federal laws.

Every reasonable effort will be made to return eligible employees to their previous position or a comparable one. They will be treated as though they were continuously employed for purposes of determining benefits based on length of service such as the rate of leave accrual.

Employees may also use available accrued leave to perform their required military training sessions and continue to receive full pay.

6.0 YOUR CAREER DEVELOPMENT

Your professional training and development can be beneficial both to you and TSG. But you must show the initiative and desire to move ahead in your career.

6.1 EDUCATION ASSISTANCE

It is the policy of TSG to support and encourage the educational development of its employees and to increase their knowledge and professional qualifications as it relates to TSG operations.

The current program benefits (on a refundable basis for regular full-time employees) are as follows:

1. $2,500 per calendar year for undergraduate coursework.
2. $4,000 per calendar year for graduate coursework.
3. $5,000 per calendar year for graduate engineering coursework.

Employees must be in regular full-time status and employed continuously by TSG for three (3) months or more. The employee must be on TSG’s payroll the date the course begins and ends (this requirement may be waived in the event of a layoff), and who qualifies under this Section.
Your education assistance application must be approved by the Supervisor, Program Manager or Group Vice President and submitted to the Human Resources Director prior to class registration. This form will be submitted to the Group Vice President for final approval. Once approval is granted, the employee will be notified via email by a member of the Human Resources Department or a signed copy of the Education Request will be mailed to the employee.

To receive approval, the course of study must, in TSG's judgment, be of good quality, and enhance the employee's present or future job performance at TSG. The course of study must be sponsored by an accredited school, college or university. Attendance must be during non-working hours. Employees are limited to enrolling in two (2) classes per semester/quarter.

Upon completion of the course, you must submit to your Supervisor documentation from the school, college or university containing evidence of satisfactory completion of the course, and evidence of your payment for the course. Employees enrolled in undergraduate courses must receive a minimum letter grade of "C" and employees enrolled in graduate courses must receive a minimum letter grade of "B" to be eligible for reimbursement. Where there is only a pass or fail grade available, a "P" for Pass is also acceptable.

If employment terminates for any reason within twelve months following education reimbursement, you must reimburse TSG fifty percent (50%) of the funds received within the twelve (12) month period. You may reimburse TSG by payroll deduction(s) or personal check(s) payable to TSG. Additionally, by signing the application for education reimbursement, you agree that TSG may deduct funds from your paycheck(s). If the employee's paycheck, including final pay is insufficient to repay these funds, the employee agrees to reimburse TSG promptly. Any remaining amount is a debt owed to TSG that is collectible by any lawful means available.

Reimbursement will occur after successful completion of the course and completion of the Reimbursement Request Form. You must submit the Reimbursement Request Form along with copies of the following:

1. Approved Education Assistance Application,
2. cash/credit card receipt(s) (for tuition and textbooks) and
3. official grade

***Under IRS rules, education assistance is not taxable to the employee, unless it is for an advanced degree, or exceeds the maximum allowed by law (currently $5,250 per year).

6.2 PERFORMANCE APPRAISALS (CONTRIBUTION PLANNER AND EVALUATION, CP&E PROCESS)
It is the policy of TSG to review and evaluate performance through a written performance appraisal and discussion. In doing this, you and your Supervisor can discuss your performance, work-related concerns and your career goals and objectives. You and your supervisor may also want to identify and discuss your strong points as well as areas that need improvement.

Moreover, consideration is given to the results of your job performance evaluation when making decisions on merit pay increases. The receipt of a performance appraisal does not guarantee an increase in salary. Increases are awarded in an effort to truly recognize truly superior employee performance. Non-receipt of a salary increase does not mean that you are not performing well. Non-receipt can be due to other factors such as introductory status or contractual rates allowed. A salary increase, if given, may become effective at the beginning of the next full pay period following the performance review (or on or about October 1 to comply with the start of the fiscal year cycle for CP&Es).

In your first year of employment, you will receive performance appraisals by TSG after approximately your first three (3) months of employment (Introductory period). Thereafter, you will generally receive a review on an annual basis at or about the end of September. Performance reviews may be conducted more or less frequently, at any time, however, depending on performance and TSG's judgment as to its business needs.

Your performance will be rated by TSG, at its discretion, as either Exceeds Standards, Fully Achieves Standards or Improvement Required. The CP&E Employee Comments form provides ample space for you to submit your comments about your evaluation, although TSG's appraisal and evaluation is binding on you, as a condition of your employment.

Note: Employees responsible for performance appraisal of their direct reports must ensure that each employee has certified that he/she adheres to the promotion of the Ethics and Compliance Program. It is mandated that compliance must be considered prior to personnel actions and decisions including compensation.

6.3 EMPLOYEE ASSISTANCE PROGRAM (EAP)

TSG’s Employee Assistance Program (EAP) is available to all regular part-time and full-time employees and their eligible dependents. We recognize that it is sometimes difficult to cope successfully with the pressures of everyday life, and that personal problems can adversely affect your ability to perform satisfactorily on the job. We have, therefore, implemented a CONFIDENTIAL EAP (Available 24 hours per day) to provide voluntary counseling and referral services to employees who are having such problems and choose to utilize this Program.
The EAP provides employees and their families the opportunity to meet with experienced professionals. Following a thorough assessment, the counselor will either provide referrals to appropriate resources in the local community or provide short-term problem solving as appropriate. Examples of situations for which the EAP can offer help include: Marital problems, emotional distress, alcoholism, drug abuse or other personal difficulties resulting from situations such as financial, legal or health problems. For short-term problem solving, our plan offers 3 sessions per employee per issue.

You may reach this service by placing a call to LifeBalance at (800) 854-1446 or via email at www.lifebalance.net, in order to schedule an appointment. You should understand, however, that TSG has no part in the operation of this Program. LifeBalance is an independent consulting agency, and we therefore assume no responsibility or liability for any of its acts or omissions. Additional information regarding this Plan is contained in a brochure available through the Human Resources Department.

6.4 VOLUNTARY TERMINATION

Every company must plan for its future personnel needs if it is to operate efficiently. Should you decide to leave TSG, we ask that you notify your Supervisor at least two (2) weeks in advance of your final day of work.

On your last day worked, you must complete an Employee Separation Checklist with your Supervisor. At this time, you must return all TSG property charged to you to include your company badge, keys, department literature, books, equipment, and other items.

Additionally, in some cases, you may receive a Corporate Security debriefing and/or exit interview. Clearing yourself of these personal accountabilities will expedite disbursing your final paycheck. Remember also that you must continue to protect confidential and proprietary TSG information, including trade secrets and inventions, if applicable, after you leave TSG.

7.0 WHAT WE EXPECT FROM YOU

Whenever a group of people work together, there must be standards of conduct and attendance for common guidance and efficiency. It is impossible to define in detail every standard for every circumstance, and TSG tries to keep rules to a necessary minimum. We hope that your common sense will guide you as to the proper thing to do in most cases, so we have listed below only a few specifics regarding what we expect from you. This should not be regarded as an all-inclusive list of our expectations or standards.
If you have any questions about these standards of conduct and attendance, or about what to do or not to do in a situation, please contact your Supervisor.

Obviously, when employee misconduct occurs, measures must be undertaken to correct the situation and to curtail further occurrences, for the good of us all. The approach we take to discipline may vary depending, at our discretion on, among other things, the gravity of the offense, the circumstances under which it occurred, your duties, your length of service (seniority) with TSG, and your overall work record, including any prior misconduct. In order of severity, discipline can take one of the following forms:

- Verbal COUNSELING
- A written WARNING or REPRIMAND
- SUSPENSION from work with or without pay
- DISCHARGE

Keep in mind that TSG has no obligation to use any one or more of these forms of discipline prior to discharging an employee. Any or all of these steps can be omitted as TSG deems appropriate, at its discretion. Moreover, by establishing this disciplinary procedure, TSG is not relinquishing or limiting its managerial right to discharge for any or no reason at all, at any time, with or without notice.

The use of progressive discipline as a pre-condition to termination thus is discretionary, in TSG’s judgment. TSG’s decision in every case is final and binding on all concerned, including the disciplined employee and all other persons or entities involved in any way, directly or indirectly.

If you do receive the benefit of any of these methods of constructive counseling, however, be sure to take advantage of the opportunity to learn from your mistakes and improve.

Some of the standards of conduct and attendance that we expect from you include, but are not limited to, the following:

7.1 **GIVE US QUALITY WORK**

TSG prides itself on being a leader in its field. One principle has been enforced without exception: Top Quality Performance. This philosophy has motivated the continued growth and success of TSG. Your continued employment is dependent upon living up to this high standard in your job.

7.2 **BE HEALTH AND SAFETY CONSCIOUS**

TSG is vitally interested in the health and safety of each employee.
But this is your concern too. Observe and obey our safety rules. Report promptly to your Supervisor any condition which you believe is unsafe or unhealthy, and any on-the-job or work-related injury.

7.3 **BE ALERT TO SECURITY**

Our job sites, TSG premises and other facilities contain valuable machinery, equipment, furnishings, merchandise, and other property. It is important, in order to protect your job and the jobs of everyone employed by TSG, that all employees pay close attention to the security of our facilities as well as all other property of TSG. Notify your Supervisor immediately if you see any suspicious or illegal activity of any kind, including the presence of strangers on our job sites or other TSG premises.

7.4 **OBSERVE THE RULES ON WORKPLACE SMOKING**

It is the policy of TSG to provide a safe and healthful work environment for all employees and visitors. Therefore, smoking and any derivative thereof is not permitted in TSG facilities, including any workplace or at any meetings, conferences or training sessions.

7.5 **KEEP US INFORMED (HUMAN RESOURCES, PAYROLL & INFORMATION TECHNOLOGY)**

Up-to-date, personal information is necessary for a number of reasons, including ensuring the administration of your employee benefits. It is your responsibility to notify TSG’s Human Resources Director promptly of any change in your work address, e-mail address, telephone number, marital status, number of dependents, beneficiary designation, emergency contact information or anything else that would affect your employee benefits or our ability to contact you quickly. When appropriate, employees should submit this information on a TSG Payroll Action Form or by completing the appropriate benefit change form.

7.6 **REMEMBER COURTESY**

We view service to our customers and business family as one of our most important responsibilities. You are expected to help us carry out this policy by extending every courtesy and all assistance necessary, not only to customers and your fellow employees, but to any callers or business visitors to TSG. If someone asks you for assistance that you are unable to give, refer them to your Supervisor or the Human Resources Director.
7.7 **BE AWARE OF YOUR PERSONAL APPEARANCE**

Individual appearances are an important aspect of TSG's overall image, and each employee has a responsibility to be properly dressed at all times. Your common sense should lead you to practice good personal hygiene and to wear clean and neat clothing. Consult with your Supervisor or the Human Resources Department for specific guidelines regarding personal appearance in your work area (A copy of the dress code will be provided).

7.8 **RESPECT PROPRIETARY INFORMATION**

Any information concerning the business of TSG, its customers, suppliers, subcontractors, dealers, employees or personnel associated with TSG is proprietary and restricted. Such proprietary information includes, but is not limited to, customer lists, customer preferences, financial information, marketing strategies, new materials research, proposal costs and bidding strategies, technological data and pending patents and technological prototypes. You may not reveal any such information except under the direction of your Supervisor or with his approval. If you are not sure about whether particular information is subject to this proprietary duty, refer inquiries to your Supervisor. Any employee who improperly uses or discloses trade secrets or proprietary business information will be subject to disciplinary action, up to and including termination of employment and legal action, even if he or she does not actually benefit from the disclosed information.

7.9 **RESPECT OUR POLICIES ON ELECTRONIC MAIL (E-MAIL) COMPUTERS AND OTHER COMMUNICATIONS EQUIPMENT**

All electronic and telephonic communication systems, computers and other business equipment and communications, including TSG-provided phone mail, e-mail, Internet access, fax machines and similar business devices, are the sole property of TSG. Any information transmitted by, received from, or stored in such equipment is also TSG’s property. Employees should only use these systems for legitimate business purposes to advance TSG's business interests and not for their own personal use. These systems must not be used to transmit or download solicitations or offensive, vulgar or otherwise disruptive messages or materials, including, but not limited to, those that contravene TSG's policies regarding Equal Employment Opportunity and Sexual Harassment.

TSG employees supporting the FAA contract should consult the corresponding IOT&E Addendum to this handbook.

7.10 **RESTRICT PERSONAL PHONE CALLS**
While personal phone calls are permitted, they must be kept to a minimum. Calls should be made or received only when necessary, and be as brief as possible. Personal long distance calls should not be charged to TSG.

TSG employees supporting the FAA contract should consult the corresponding IOT&E Addendum to this handbook.

7.11 RESTRICT CONFLICTING OUTSIDE ACTIVITIES

In limiting employees' involvement in certain outside activities, we are not attempting to interfere in your personal life, but rather we want to protect the best interests of TSG and all of our personnel. We cannot permit you to pursue activities which, in the judgment of TSG, may be in conflict with the general welfare of TSG or have the appearance of impropriety, or which might otherwise damage TSG's reputation, or interfere with our business or the proper performance of your duties.

Certain activities which obviously are not proper for employees include but are not limited to employment with a competitor; use of TSG's time, facilities or equipment to engage in another business or occupation; holding financial interests that conflict with conscientious performance of their duties; solicitation or acceptance of any gift or anything of monetary value from any person or entity doing business with TSG; use of their position at TSG for private gains; and any outside activity which results in your losing time from work, being distracted from work, or otherwise performing unsatisfactorily, or which could result in an appearance of conflict. In addition, a conflict may arise when a TSG matter is likely to affect the financial interest of a member of an employee's household. You should consult with our Human Resources Manager before engaging in any activity which might be covered by this policy.

7.12 AVOID CONFLICTS OF INTEREST

It is important to TSG that all of our employees observe high ethical standards and treat both our customers and fellow employees fairly. You cannot allow personal or financial relationships with customers to interfere with the best interests of TSG. Similarly, personal or family relationships between employees within the same department will not be allowed to create the appearance of favoritism or otherwise affect the workplace.

7.13 AVOID PROHIBITED SOLICITATION OF CUSTOMERS

As a condition of working for TSG, you agree that all TSG customers that employees now or hereafter service during their employment, and all prospective customers from whom employees have solicited business while in TSG's employ, shall be solely TSG's customers. For a period of one year immediately following employment termination, employees shall not either directly or indirectly solicit business regarding products or
services competitive with those of TSG from any of TSG’s customers with whom employees

7.14 FOLLOW COMMON SENSE STANDARDS OF CONDUCT (TO INCLUDE TSG’S CODE OF ETHICAL BUSINESS CONDUCT) TO AVOID MAJOR OFFENSES

You should be aware that there are certain major offenses which may result in an immediate penalty of probation, or suspension subject to discharge, or discharge, without any prior counseling. In order to avoid such consequences, just follow simple common sense guides and avoid major offenses such as, but not limited to, the following:

(a) Failure or refusal to carry out orders or instructions (insubordination).

(b) Unsatisfactory work performance.

(c) Failure to fulfill the responsibilities of the job to an extent that might or does cause injury to a person or damage to or loss of product, machinery, equipment, facilities, or other property of TSG.

(d) Violation of a safety, fire prevention, health, or security rule, policy or practice.

(e) False, fraudulent, misleading or harmful statement, action or omission involving another employee, a customer, TSG or relations with TSG; or any action disloyal to TSG.

(f) False, fraudulent, misleading or harmful statement, action or omission related to an employment application or any other information provided to or requested by TSG, whether oral or written; or refusal or failure to timely provide such information.

(g) Unauthorized use of, removal of, theft of or damage to the property of TSG, an employee, an independent contractor, or a customer.

(h) Threatened or actual physical violence.

(i) Use of profane or abusive language.

(j) Carrying any weapon while on TSG business, jobsite, premises or property without authorization from TSG.

(k) Violation of any of the provisions of TSG's Drug and Alcohol Abuse Policy, as provided in this Section.
(l) Organized gambling; or disorderly or immoral conduct while on TSG premises, jobsite or business.

(m) Accepting or engaging in any outside employment with a competitor of TSG; or conducting or attempting to conduct any outside business while on TSG’s premises or business.

(n) Garnishments beyond the type and number protected by law.

(o) Chronic, habitual, or excessive lateness or absenteeism of any type, early departure from work, and/or other violation of TSG’s Standards of Attendance as provided in this Section.

(p) Harassment of another employee of a sexual nature or otherwise, including but not limited to verbal or physical misconduct, or unwelcome advances with regard to or on the basis of race, color, religion, creed, age, sex, national origin or disability.

(q) An arrest, criminal complaint, summons to answer a criminal charge, statement of charges, indictment, criminal information or any other criminal charge or conviction of an employee, depending on the particular circumstances and the offense charged, including but not limited to TSG’s judgment as to the potential risk to safety or health of employees, the security of TSG premises and property, and/or TSG’s reputation.

(r) Fraudulent timecard reporting.

(s) Personal use of the company credit card.


7.15 **COMPLY WITH OUR STANDARDS OF ATTENDANCE**

It is your obligation to notify your Supervisor, as far as possible in advance of your scheduled work day, whenever you will be late or absent, to state the reason for such lateness or absence, and to advise when you expect to return to work. The message should include a telephone number where you can be reached. If you are physically unable to make a personal call, you must have someone else call for you. A written medical excuse may be requested by TSG from the employee’s doctor, for any absence, at TSG’s discretion, and will always be requested for absences greater than two days in length. Obviously, following these steps does not excuse the absence.

No absence is automatically considered to be "excused" as such. Chronic, habitual, or excessive absenteeism or lateness, as judged by TSG in its discretion, may result in
disciplinary action, up to and including termination, in circumstances including but not limited to:

(a) Frequent short-term absences and/or tardiness in violation of TSG rules.

(b) Absence from work for two (2) consecutive scheduled work days without notifying TSG during the absence of an illness or accident preventing you from working (as evidenced by written certification of a medical doctor if requested by TSG), or other satisfactory reason for such absence, as determined by TSG.

(c) Failure to return to work within two (2) consecutive scheduled work days after being released for duty by a doctor, unless specifically requested not to do so by the Human Resources Director, or after being notified of recall from layoff status by TSG.

(d) Subject to our policy on family and medical leave, absence from work for any reason, including but not limited to illness, on or off-the job injury, layoff, or leave of absence, for a period in excess of twelve (12) consecutive months since your last day worked for TSG, or for a period exceeding the length of your continuous service with TSG, whichever is shorter.

7.16 EMPLOYEMENT OF SUSPENDED OR DEBARRED INDIVIDUALS

Federal and state agencies have the authority to exclude individuals or entities who have engaged in fraud or abuse from participation in programs they sponsor. As such, TSG Corporation is committed to exercising due diligence to prevent and detect unethical behavior and/or violations of applicable laws, regulations, and policies by its employees and independent consultants which would require exclusion from participation in Federal programs. TSG does not knowingly employ, with or without pay, an individual listed by a Federal Agency as being under indictment, convicted, or listed by a Federal Agency as debarred, suspended, or otherwise ineligible for Federal programs.

In order to carry out this policy, TSG’s Director of Human Resources will make a reasonable inquiry into the status of any potential employee or consultant. Such a reasonable inquiry is made during the hiring process and includes at a minimum, review of the General Services Administration’s (GSA) List of Parties Excluded from Federal Procurement and Nonprocurement Programs as maintained by GSA on the Internet.

In the unlikely event that a post-offer applicant is confirmed as being excluded or debarred, the individual will be ineligible to start employment. The Human Resources Director will immediately notify the Chief Ethics and Compliance Officer. Thus, the employment offer will be rescinded immediately.
In the event that an employee is indicted or is proposed for debarment (or other offenses as noted within Article 17 of the Air Force Administrative Agreement) during his/her employment, the Company, in its discretion, may make the decision to terminate employment. However, until a decision is made regarding the employee’s future status with the Company, the employee will be removed from responsibility for or involvement with U.S. Government business affairs until the resolution of the criminal case or such suspension or proposed debarment.

7.17 EMPLOYMENT OF INDIVIDUALS IN VIOLATION OF THE FOREIGN CORRUPT PRACTICES ACT

In addition, if a TSG employee is charged with a criminal offense relating to the Foreign Corrupt Practices Act, false statements, false claims, corruption, conflict of interest, unlawful business practices or anti-competitive conduct or otherwise charged with an offense relating to honesty or integrity, TSG will remove that employee immediately from responsibility or involvement with TSG business affairs.

If the employee is convicted of a criminal offense relating to the Foreign Corrupt Practices Act, false statements, false claims, corruption, conflict of interest, unlawful business practices or anti-competitive conduct or an offense relating to honesty or integrity; or debarred, TSG policy requires that the employee will be terminated and TSG will notify the proper authorities within 24 hours of the action.

7.18 MAINTAIN A DRUG AND ALCOHOL FREE ENVIRONMENT

In order to protect the safety, health, and productivity of all employees and the general welfare of TSG, the following actions are considered by TSG to be unacceptable conduct. A violation of any of these rules will be considered a major offense which, in TSG’s judgment, may result in probation, suspension subject to discharge, or discharge.

a) Bringing onto TSG’s premises, property or jobsite, having possession of, having present in the body system, being under the influence of, using, consuming, distributing or attempting to distribute, manufacturing or dispensing any form of narcotic, depressant, stimulant, hallucinogen, or any kind of perception-altering drug or controlled substance (excepting only the taking of a prescribed drug under the direction of a physician, to the extent it does not impair job performance or threaten safety, health, security or property), at any time during the hours between the beginning and end of your work day, whether or not on TSG business, premises, property or jobsite.

b) Bringing onto TSG's premises, property or jobsite, having possession of, being under the influence of, using, consuming, distributing or attempting to distribute, manufacturing or dispensing any form of alcohol at any time during the hours between the beginning and end of your workday, whether or not on TSG
business, premises, property, or jobsite, except (in moderation) for authorized TSG-sponsored social activities or business entertainment purposes.

c) Having possession of, being under the influence of, using, consuming, distributing or attempting to distribute, manufacturing or dispensing drugs, alcohol or any other mind or perception-altering substance off TSG premises, property or jobsite, and outside your working hours, that could or does adversely affect your job performance, your or other persons' safety, health, security or property, or TSG's reputation.

d) Refusing to cooperate in or submit to questioning, medical or physical tests or examination, or an inspection or search, when requested or conducted by TSG or its designee and when in accordance with applicable laws.

e) Prescription drugs are permitted as long as they are prescribed by a physician for the person in possession of them and are used as prescribed. Over-the-counter medications are permitted as long as they are used as directed for the purpose for which they are intended. Prescription drugs and over-the-counter medication must be kept in their original marked container and must not result in side-effects that, in TSG's opinion, pose a threat to the safety of the employee or others.

f) An employee who uses prescribed drugs or over-the-counter medication that may impair his or her ability to perform an essential function of his or her job or pose a threat to the employee or to others is expected to report this information to the Supervisor of the Human Resources Department.

g) Nothing in this Policy shall be construed as inconsistent with TSG's responsibility for compliance with Federal, State and Local laws regarding fair employment practices, and the implementation of this Policy shall be accomplished in accordance with such laws.

h) TSG considers any violations of the guideline above to be unacceptable conduct. Any violations of this policy will be considered a major offense, which in the judgment of TSG may lead to disciplinary action, up to and including immediate termination of employment and/or required participation in a substance abuse rehabilitation or treatment program.

i) An employee who is arrested for, or convicted of, a drug offense including but not limited to the sale, consumption, distribution, manufacture or possession of any form of narcotic, depressant, stimulant, hallucinogen, or any kind of perception-altering drug or controlled substance must promptly inform his/her Supervisor of the arrest, the nature of the charge and the ultimate disposition of the charge. Failure to do so is grounds for disciplinary action, up to and including termination. Such arrest/conviction may subject the employee to discipline, up to and including termination, depending upon the circumstances involved.
j) Overconsumption of alcohol at company social events is not acceptable.

Examinations and Searches for Drugs and Alcohol

TSG retains the right, in its discretion, to the extent permitted by law, to require all employees and applicants for positions to submit to physical examinations or tests by a person or agency designated by TSG, at TSG expense. Such examinations may include but are not necessarily limited to blood, urine, breath, or other tests for evidence of the presence of alcohol, drugs, and perception-altering drug or other controlled substances in the body. As is further set forth in Section 3.9 of this Handbook, TSG also reserves the right to search employees’ packages, vehicles, lockers, handbags and similar items while on TSG property or business.

In particular, TSG reserves the right, in its discretion, to examine or test for the presence of alcohol and drugs (as stated above) in situations such as, but not limited to, the following, in accordance with applicable law:

a) As part of a pre-employment physical examination.

b) As part of a physical examination which TSG may require employees to undergo on a regular basis, on a schedule to be determined by TSG.

c) Due to the safety or health risk or sensitive security duties of a specific job, as determined by TSG, at any time.

d) Following a safety infraction or work-related accident that does or might cause bodily injury or damage to property, in TSG's judgment.

e) Specific employee behavior on the job which TSG determines gives management reasonable suspicion that such behavior might be or is due to alcohol or drug use.

f) As otherwise required or permitted by applicable law.

7.19 EMPLOYEE ASSISTANCE PROGRAM (EAP)

As is set forth in Section 6.3 of this Handbook, TSG provides an Employee Assistance Program (EAP) as an employee benefit. Employees are encouraged to seek voluntary assistance in dealing with any drug or alcohol problem. A voluntary leave of absence may also be available, under TSG's leave of absence policy, for purposes of rehabilitation from drug and alcohol problems. If an employee is found by TSG to have committed a drug or alcohol related offense, as set forth above, under some circumstances he or she may be referred to the EAP for rehabilitation, being subject to disciplinary action then, if he/she refuses or fails rehabilitation.
8.0 OUR RESPONSIBILITIES

Notwithstanding any other provision of this Handbook, all managerial and administrative functions and prerogatives entrusted to and conferred upon employers inherently, expressly, and by law, are retained and vested exclusively with TSG, including but not limited to the right to exercise our judgment and discretion to take whatever action is necessary to operate TSG's business, protect its health, property, security, and general welfare; to reduce, contract out, sell, close down, or relocate TSG's operations or any part thereof; to hire, layoff, direct, discipline, discharge, or increase the efficiency of the workforce in the manner and to the degree TSG deems appropriate; to set the standards of productivity, maintenance, services, security, research and development; and, in general, to take whatever other actions necessary in TSG's judgement and discretion to administer TSG's operations and direct its work force.

Although TSG from time to time expects to expand the wages, benefits, work rules, services, and policies summarized in this Handbook, we reserve the right to alter, amend, reduce or discontinue any wage schedule, policy, work rule or benefit included in this Handbook. The failure of TSG to exercise any prerogative or function in a particular way shall not be considered a waiver of TSG's right to exercise such prerogative or function or preclude it from exercising that prerogative or function in some other way.
Operations Log Sheet Note Book
Retail Log Sheets
# Cash Drawer Balances

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</tbody>
</table>

**Notes:**
- Cash drawer balances are rounded to the nearest dollar.
- The cash drawer balance on 01/01/2023 is the starting balance.
- All cash drawer balances are recorded at the end of each day.
Section 9 — Employee Qualifications, Description of Duties and Training Contd. - Dispensary

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

9. Rosario Garcia—Quality Assurance / Ethics and Compliance Manager:

The QC/ Ethics and Compliance Manager role, responsibility and duties will include revising procedures, reports etc. periodically to identify hidden risks or non-conformity issues as they relate to corporate policies and plans, including TSG’s AAP and EEOC Plans. Ensuring high level of internal and external customer service. Investigating and correcting customer issues and complaints relating to quality. Supervising staff to ensure high productivity and high technical integrity. Developing and analyzing statistical data and product specifications to determine standards and to establish quality and reliability expectancy of finished products. Formulating, documenting and maintaining quality control standards and on-going quality control objectives. Interpreting quality control philosophy to TSG’s staff. Applying total quality management tools and approaches to analytical and reporting processes. Maintaining active role on internal continuous process improvement measures. Designing, developing and implementing quality control training programs.

Ms. Garcia’s compliance duties will include developing and overseeing control systems to prevent or deal with violations of legal guidelines and internal policies, drafting, modifying and implementing company policies, collaborating with corporate counsels and HR departments to monitor enforcement of standards and regulations, assessing the business’s future ventures to identify possible compliance risks, reviewing the work of colleagues when necessary to identify compliance issues and provide advice or training, keeping abreast of regulatory developments within or outside of the company as well as evolving best practices in compliance control, preparing reports for senior management and external regulatory bodies as appropriate.

10. Katara Hanson—HR Manager and Lead on Diversity Mentoring, Training, and Professional Development Programs:

The HR Manager will be responsible for developing and administering various HR plan and procedures for all company personnel. Planning, organizing and providing oversite to all HR activities. Maintaining affirmative action program; evaluating and filing applicable reports annually; maintains other records, reports and logs to conform to EEO regulations as necessary. Implementing and annually updating the compensation program; conducting annual salary surveys and developing merit pool (salary budget); and analyzing compensation. Establishing and maintaining department records and reports. Participating in administrative staff meetings and attending other meetings, such as seminars. Maintaining organizational charts and employee directory. Evaluating reports, decisions and results of HR initiatives in relation to established goals. Recommends new approaches, policies and procedures to effect continual improvements in efficiency of department and services performed. Ensuring compliance with all federal, state and local employment laws.
Ms. Hanson is formally trained in Diversity through the Society for Human Resource Management, and she will also serve as TSG’s Diversity Lead, assisting with the development of policies and programs to attract, retain and promote a diverse workforce for TSG. In this role, her duties and responsibilities include developing training schedules to educate employees and managers on how to recognize, accommodate and appreciate individual differences and how these can be bridged back to assist in meeting TSG’s business plans. Creating diversity training materials and coordinating online training. Reviewing, auditing, and updating older diversity training materials to ensure they are up to date with all applicable regulations. Developing metrics for measuring the effectiveness of TSG’s diversity initiatives; implementing and preparing quarterly reports to management on the value of the initiatives. Keeps current on diversity programs and developments by maintaining contact with others in the field (e.g., professional association and educational groups, and professional development efforts).

11. Bridget Spruill—Business Management Director and Community Outreach Program Lead:

The Business Management Director and Community Outreach Program Lead’s roles and responsibilities will include developing business management goals and objectives intended to grow TSG’s business. Designing and implementing business plans and strategies to promote the attainment of goals. Ensuring that TSG has the adequate and suitable resources to complete its activities (e.g. people, material, equipment etc.). Organizing and coordinating operations in ways that ensure maximum productivity. Maintaining relationships with vendors/suppliers. Gathering, analyzing and interpreting external and internal data and write reports. Assessing overall company performance against objectives. Representing the company in events, conferences etc. Ensuring adherence to legal rules and guidelines. Ms. Spruill has extensive community outreach experience as well and in her role as TSG’s Community Outreach Lead, she will be responsible for developing community outreach activities and programs that enhance business opportunities, including meeting with physicians to educate them on all aspects of medical cannabis, working on dispensary relations, assisting in the development, and creation of marketing material to distribute to different audiences (including physicians and patients).

12. Amina Garrett—Senior Staffing Specialist/Recruiter:

The Senior Recruiters responsibility and duties will include conducting cradle to grave recruiting, including screening, sourcing, and vetting candidates; write and place job descriptions on various subscription databases as well as on social media; conduct candidate interviews, conduct reference checks; extend job offers; conducts new-employee orientations; monitors career-path program and employee relations counseling; conducts exit interviews.

13. David McCoy: TSG’s Security Director, Mr. David McCoy, with nearly 40 years of experience as a security professional, including serving as a Security Director for a large pharmaceuticals company, will lead TSG’s corporate and physical security function. In this role, he will be responsible for developing the vision and program parameters necessary to ensure the effective implementation and execution of a world class medical cannabis facility security program. He will do so by implementing, executing, managing, and maintaining all of TSG’s
Pennsylvania Medical Cannabis facility security activities and operations, including providing oversight on TSG’s overall security strategy, security architecture development, and functional oversight. The scope of this role covers all utilized security technologies and services, including protection services, perimeter defenses, physical and logical access control, and profile management of all employees, physicians, contractors and visitors.

This role’s additional responsibilities include achieving operational excellence in: investigation procedures and governance, exposure to liability and physical risk management, protection for employees, physicians, members, patients and visitors to TSG’s medical cannabis facilities, all of TSG’s transportation activities, and asset loss and fraud prevention. Additionally, one of the most critical functions of TSG’s Security Director will be to manage TSG’s security training programs, including anti-diversion training programs, for all company employees.

14. Wilbert Whitaker Jr.—Facilities Manager: Mr. Whitaker’s duties and responsibilities in the role of facilities manager for TSG’s facilities consist of managing and maintaining the buildings and grounds of the organization, including providing oversight to the upkeep of equipment and supplies. This includes ensuring the buildings and grounds are maintained, which entails daily and weekly cleaning schedules as well as determining and scheduling repairs, renovation projects, waste reduction improvements and safety inspections. As such, Mr. Whitaker will be responsible for coordinating with the custodial and maintenance staff. He will also be in charge of a budget for supplies, repairs and other measures

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

9. Rosario Garcia: Ms. Garcia is a Quality Assurance and is an ethics and compliance Subject Matter Expert (including both ISO and CMMI) who has developed and implemented compliance training programs for the past 15 years. Ms. Garcia is a Quality Control (QC), compliance, assurance, and audit credentials include ISO 9001:2008 Lead Auditor (TPECS) Certification, ISO 9001:2015 TPECS v2.0 Certification, and CMMI Level 2 and Level 3 Appraisal Team Member status from the Software Engineering Institute. She also possesses over 13 years of consecutive experience in the field, including experience recording, auditing, and reporting on various components of corporate Quality Management Systems (QMS), including corporate diversity and AAPs. Ms. Garcia has spent the last eight years working as a full time QC Director/Diversity Management employee for TSG’s senior management, where she successfully completed both registration and surveillance ISO 9001:2008 internal and external audits with outstanding results including four audits with zero nonconformities identified. While working for TSG’s senior management, the programs she assisted TSG’s senior management with were also awarded Ethisphere’s “Best Overall Ethics Programs” including #2 Best Small Company Ethics Programs and #4 Best Private Company Ethics Programs. Ms. Garcia is a graduate of Georgetown University, and is bilingual in English and Spanish.
10. Katara Hanson: Ms. Hanson possesses a Masters of Art in HR Management from Marymount University, and a Graduate Certificate in Human Resources, Foundations of Employee Relations from Cornell University. She also possesses over 14 years’ of consecutive HR experience, and is currently working as a full time employee for TSG’s senior management. Her areas of specialization include diversity training and professional development programs. Her formal diversity training includes completing the Society for Human Resource Management (SHRM) Diversity & Inclusion Strategic Leadership Program. Ms. Hanson is also currently SHRM CP, Professional in Human Resources (PHR), SHRM HR Generalist, and SHRM Essentials of HR Management Certified. Ms. Hanson has put together a comprehensive diversity mentoring, training, and professional development program for several of Russell Wright’s businesses. Prior to working for Mr. Wright, Ms. Hanson has experience working as an HR Business Partner for large firms including Science Applications International Corporation. Ms. Hanson’s specializations include: Human Resources Management, Benefits Administration, Supporting Diversity, Performance Management, Communication Processes, Compensation and Wage Structure, Classifying Employees, Employment Law, and Laws Against Sexual Harassment. Ms. Hanson holds her Masters of Art (MA) in Human Resource Management from Marymount University, her Bachelors of Science (BS) in Therapeutic Recreation from Winston-Salem State University, and her Graduate Certificate in Human Resources, Foundations of Employee Relations, from Cornell University.

11. Bridget Spruill: A highly skilled professional with over 15 years of cumulative experience in executive and administrative management, politics and event management. Ms. Spruill served as the Director of Small Business Development and Coordination for Mr. Wright, where she developed, managed and maintained relationships with all of his firms’ small business partners. Ms. Spruill assisted division leads with identifying and prioritizing opportunities with small businesses, acted as the internal Small Business advocate on their behalf, and assisted in developing strategies to secure desired relationships with targeted partners.

Prior to working for Mr. Russell Wright, Ms. Spruill was the Senior Director of Communications for National Children’s Center (NCC), a non-profit organization headquartered in Washington, DC that provided services to children and adults with developmental disabilities. Ms. Spruill was responsible for all marketing and public relations activities that supported the short and long-term objectives of NCC and ensured that the organization’s professional image was positively maintained at all times. She organized and assisted with all marketing, outreach and communications efforts pertaining to NCC leadership, fundraising efforts, campaign initiatives and Board of Directors activities. In addition, she managed all aspects of internal and external correspondence (newsletters, blogs, social media outreach, etc.) and assisted in the development of written products that supported and advertised the programs and initiatives of the organization.

Ms. Spruill was previously the Manager of Quality Assurance for Dimensions International, and worked directly with all areas of leadership to drive the quality strategy for the organization. In this capacity, she maintained and enforced all necessary policies and procedures as it related to the corporate Quality function across the company, and was successful in ensuring continued ISO 9001 certification.
Prior to being appointed Manager of Quality Assurance, Ms. Spruill acted as a private Consultant on several significant projects, including assisting The White House Office of Public Liaison with the creation and implementation of an African American Outreach Initiative plan for President George W. Bush. In her consultant capacity, she also provided administrative, management, and strategic consultation to the African American Leadership Committee, Humphrey International, Inc., and The George Washington University, Graduate School of Education and Human Development.

12. **Amina Garrett:** Ms. Garrett is a U.S. Army Veteran and senior staffing professional and Human Resources Generalist with over 10 years of experience in corporate recruiting. Prior to working for Mr. Wright, she worked for large firms including Science Applications International Corporation as a senior recruiter and as a HR Generalist for Nonprofit organizations including the National Minority AIDS Council. Her specializations include: full-life cycle recruitment, program management, employee benefits enrollment, new hire orientation/onboarding, and timesheet administration. Additionally, her Software Proficiency include Microsoft Office Suite, Taleo, Njony, Recruitmax (Vurv), Springboard, Extensity, SETS, iCIMS, EZ Order, Deltek, Costpoint, SAP, and SharePoint.

13. **David McCoy, CPP, MBA – Security Director:** will serve as TSG’s lead security advisor. He is a security subject matter expert with nearly 30 years of consecutive security related experience. He is a Certified Protection Professional and his specialties include security management, physical security, industrial, access control, CCTV, surveillance and surveillance equipment, corporate security, vulnerability assessments, risk assessment and management. Mr. McCoy’s security experience ranges from providing security services on various federal contracts for large government contracting companies (including serving as a security supervisor for Lockheed Martin’s Missiles and Fire Control Division and as Senior Security Manager for Battelle for 16 years), to serving a security manager for banks (including Comerica bank). He has also served as a physical security subject matter expert for various government state and local organizations including the City of Austin, Texas and Wake County, North Carolina. As such, Mr. McCoy has a significant and extensive physical security experience. Mr. McCoy holds his MBA from Northcentral University and his BA in Criminology and Criminal Justice from the Ohio State University.

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.**

9. **Rosario Garcia:** TSG will require all employees to complete a 2-hour training course developed by the Department as required by §1141.48. Employees will need to complete this training course within the first 90 days of employment with the company. TSG will retain all attendance records of all principals and employees and will make them available to the Department and its authorized agents upon request. Topics that should be covered in the Department developed training course will include the following: the provisions of the act relevant to the responsibilities of principals and employees. Proper handling of medical

TSG will also require all employees to complete separate, additional training and education developed by our retained regulated marijuana industry consultant American Cannabis Company Inc. (“ACC”). In operation since 2013 the company consulting partner has assisted clients in 10 plus US markets and Canada. The founders also owned and operated a vertically integrated medical marijuana center in Colorado prior to founding the consulting company. This extensive experience has been used for the development of its training materials and SOPs. All employees will receive extensive hands-on training and education from ACC prior to beginning any operations within the facility. Topics that will be covered in our -developed training course will include the following: current Pennsylvania laws and regulations and training on the BioTrackTHC inventory control system as well as training on written standard operating procedures, including: State regulatory Compliance; General Security/Diversion Prevention Training; OSHA Compliance; Limited Access Area; Patient Confidentiality; HIPAA Compliance Training; Employee Dress Code and Personal Hygiene; Facility Entry Protocol; Opening Procedure; Visitors; Sales Procedure; Customer Complaints/Returns; Cash handling; Marijuana Products Inventory Reconciliation Procedure; Product Recall; Loss of Personnel.

Once employees have completed the additionally required training provided by TSG’s marijuana industry consultant American Cannabis Company Inc. (“ACC”), they will be evaluated on an individual basis by our consultants to ensure they have understood and retained the training information.

10. Katara Hanson: TSG will require all employees to complete a 2-hour training course developed by the Department as required by §1141.48. Employees will need to complete this training course within the first 90 days of employment with the company. TSG will retain all attendance records of all principals and employees and will make them available to the Department and its authorized agents upon request. Topics that should be covered in the Department developed training course will include the following: the provisions of the act relevant to the responsibilities of principals and employees. Proper handling of medical marijuana. Proper recordkeeping. How to prevent and detect the diversion of medical marijuana. Best practice security procedures. Best practice safety procedures, including responding to the following: a medical emergency. A fire. A chemical spill. A threatening event including: an armed robbery. A burglary. A criminal incident.

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11. **Bridget Spruill:** TSG will require all employees to complete a 2-hour training course developed by the Department as required by §1141.48. Employees will need to complete this training course within the first 90 days of employment with the company. TSG will retain all attendance records of all principals and employees and will make them available to the Department and its authorized agents upon request. Topics that should be covered in the Department developed training course will include the following: the provisions of the act relevant to the responsibilities of principals and employees. Proper handling of medical marijuana. Proper recordkeeping. How to prevent and detect the diversion of medical marijuana. Best practice security procedures. Best practice safety procedures, including responding to the following: a medical emergency. A fire. A chemical spill. A threatening event including: an armed robbery. A burglary. A criminal incident.

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12. **Amina Garrett:** TSG will require all employees to complete a 2-hour training course developed by the Department as required by §1141.48. Employees will need to complete this training course within the first 90 days of employment with the company. TSG will retain all attendance records of all principals and employees and will make them available to the Department and its authorized agents upon request. Topics that should be covered in the
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Once employees have completed the additionally required training provided by TSG’s marijuana industry consultant American Cannabis Company Inc. (“ACC”), they will be evaluated on an individual basis by our consultants to ensure they have understood and retained the training information.

**13. David McCoy:** TSG will require all employees to complete a 2-hour training course developed by the Department as required by §1141.48. Employees will need to complete this training course within the first 90 days of employment with the company. TSG will retain all attendance records of all principals and employees and will make them available to the Department and its authorized agents upon request. Topics that should be covered in the Department developed training course will include the following: the provisions of the act relevant to the responsibilities of principals and employees. Proper handling of medical marijuana. Proper recordkeeping. How to prevent and detect the diversion of medical marijuana. Best practice security procedures. Best practice safety procedures, including responding to the following: a medical emergency. A fire. A chemical spill. A threatening event including: an armed robbery. A burglary. A criminal incident.

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14. Wilbert Whitaker Jr.: Mr. Wilbert Whitaker is a facilities subject matter expert with nearly 30 years of experience in property management and disposition services. Mr. Whitaker served twenty years on active duty in the U.S. Army as a Chief Warrant Officer property accounting technician. Since his retirement from active duty, he has continued to apply his knowledge and expertise in support of U.S. Army operations both on a national level and internationally, including on contracts in Afghanistan and in Iraq. In doing so, Mr. Whitaker served as Director of Property and Logistics for large companies including DynCorp (on the Logistics Civil Augmentation Program) and Sciences Application International Corporation (MRAP Program Kuwait). Mr. Whitaker’s specialties include planning and coordinating installation services (i.e. telecommunications, heat, electricity etc.) and refurbishments, managing the upkeep of equipment and supplies to meet health and safety standards, inspecting buildings’ structures to determine the need for repairs or renovations, reviewing utilities consumption, and controlling activities such as parking space allocation. Mr. Whitaker possesses his Bachelor of Arts from Leo University, he is currently a member of the National Property Management Association (NPMA) and is PropertyBook Unit Supply Enhanced (PBUSE) certified.
B. Please List Employees (Continued)

LEASE 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.

First Name: Susan
Last Name: Sisley
Suffix: M.D.
Occupation: Physician, Medical Cannabis Subject Matter Expert, Internal Medicine, Psychiatrist
Title in Applicant’s Business: Medical Advisor

First Name: Michael
Last Name: Royer
Suffix: C.P.A.
Occupation: Chief Financial Officer (CFO)
Title in Applicant’s Business: CFO

First Name: Bridget
Last Name: Spruill
Suffix:
Occupation: Director, Disadvantaged and Small Business Outreach Specialist
Title in Applicant’s Business: Director, Business Services, and Small Business Development
First Name: Rosario
Last Name: Garcia
Suffix: TPECS (Lead Auditor)

Occupation: Quality Management, Ethics & Compliance Manager, Diversity Specialist
Title in Applicant’s Business: Manager, QM/Ethics Specialist

First Name: Katara
Last Name: Hanson
Suffix: MA, PHR, SHRM-CP

Occupation: Senior Human Resources and Diversity Specialist
Title in Applicant’s Business: Human Resources Business Partner

First Name: Amina
Last Name: Garrett

Occupation: Staffing/Recruiting Specialist
Title in Applicant’s Business: Sr. Technical Recruiter
First Name: David
Last Name: McCoy
Suffix:
Occupation: Security Specialist
Title in Applicant’s Business: Director of Security

First Name: Wilbert
Last Name: Whitaker
Suffix:
Occupation: Logistics & Facilities Specialist
Title in Applicant’s Business: Facility Manager
B. Please List Employees (Continued)

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First Name: Susan
Last Name: Sisley
Suffix: M.D.
Occupation: Physician, Medical Cannabis Subject Matter Expert, Internal Medicine, Psychiatrist
Title in Applicant’s Business: Medical Advisor
Date of Birth: DOH REDACTION

First Name: Michael
Last Name: Royer
Suffix: C.P.A.
Occupation: Chief Financial Officer (CFO)
Title in Applicant’s Business: CFO
Date of Birth: DOH REDACTION

First Name: Bridget
Last Name: Spruill
Suffix:
Date of Birth: DOH REDACTION
Occupation: Director, Disadvantaged and Small Business Outreach Specialist
Title in Applicant’s Business: Director, Business Services, and Small Business Development
First Name: Rosario  
Last Name: Garcia  
Suffix: TPECS (Lead Auditor)  
Date of Birth: [redacted]  
Occupation: Quality Management, Ethics & Compliance Manager, Diversity Specialist  
Title in Applicant’s Business: Manager, QM/Ethics Specialist

First Name: Katara  
Last Name: Hanson  
Suffix: MA, PHR, SHRM-CP  
Date of Birth: [redacted]  
Occupation: Senior Human Resources and Diversity Specialist  
Title in Applicant’s Business: Human Resources Business Partner

First Name: Amina  
Last Name: Garrett  
Suffix:  
Date of Birth: [redacted]  
Occupation: Staffing/Recruiting Specialist  
Title in Applicant’s Business: Sr. Technical Recruiter
First Name: David
Last Name: McCoy
Suffix:
Occupation: Security Specialist
Title in Applicant’s Business: Director of Security
Date of Birth: DOH REDACTION

First Name: Wilbert
Last Name: Whitaker
Suffix:
Occupation: Logistics & Facilities Specialist
Title in Applicant’s Business: Facility Manager
Date of Birth: DOH REDACTION